August 28, 2005

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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of Mangos
Docket #FV-05-304

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of $4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in finalizing the Proposed U.S. Grade Standard for Mangos. NAPAR surveyed members on the probable impact this grade standard would have on their business operations and have determined it to be mostly workable. Our members, however, feel that the following changes are necessary to ensure fairness in the marketplace and to allow for the continued use of certain package sizes.

Tolerance Percentages

As a tropical fruit, mangos are generally grown in Central and South America, the Caribbean and other equally exotic locations. As a result, they are shipped over great distances to many of the major U.S. population centers. Because of the distances involved, the Good Delivery Standard is applied to the vast majority of these shipments, driving a 2% tolerance for decay up to 5%. Because Good Delivery Standards are so

prevalent in the f.o.b. destination scenario for mangos, our members feel a 1% tolerance for decay, which is generally driven up to 3% by the Good Delivery Standard, is much more reasonable.

51.1043 U.S. Fancy
Tolerances: The tolerance for decay should be changed from 2% to 1%.

51.1044 U.S. No. 1.
Tolerances: The tolerance for decay should be changed from 2% to 1%.

51.1045 U.S. No. 2.
Tolerances: The tolerance for decay should be changed from 2% to 1%.

Size Requirements

51.1047 Size Requirements
Table #1 – Size designations
This table omits fruit sizes that some of our members often use in certain varieties, specifically these missing sizes are 10, 14 and 18. Our members would very much like to see these sizes included in the table.

The table also dictates that sizes 7, 9, 16, 20, 22 and 24 each have a weight range of only 2 ounces, while sizes 6, 8 and 12 each have a weight range of 4 ounces. We suggest that weight ranges could be more evenly distributed if sizes 10, 14 and 18 were included in the table.

Table #1 could be revised as follows:

Number of fruit per container	Weight in ounces
6	26 ounces – 28 ounces
7	24 ounces – 26 ounces
8	22 ounces – 24 ounces
9	20 ounces – 22 ounces
10	18 ounces – 20 ounces
12	16 ounces – 18 ounces
14	14 ounces – 16 ounces
16	12 ounces – 14 ounces
18	10 ounces – 12 ounces
20	8.0 ounces – 10 ounces
22	6.0 ounces – 8.0 ounces
24	4.0 ounces – 6.0 ounces

I hope these insights are helpful. Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

Patrick A. Davis
President

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