



March 27, 2006

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Cheri L. Emery
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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 Ms. Emery:

Re: United States Standards for Grades of **Sweet Cherries**
Docket # FV-06-302, Fed. Reg. 1/25/06, page 4100

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 determining if there is a need to proceed with a revision to the U.S. Grade Standard for Sweet Cherries.

NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations and we see no reason to incorporate the standard row size into the U.S. Grade Standards at this time.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick A. Davis'.

Patrick A. Davis
President

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