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Cheri L. Emery
Cheri.Emery@usda.gov
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture

Dear Cheri Emery:

Re: United States Standards for Grades of Table Grapes
Docket Number FV-06-304, Fed. Reg. 9/22/06, page 55367-55369

Gerawan Farming is a grower and shipper of table grapes. We oppose the proposed allowance for shatter in existing U.S. grades. As an alternative, if such an allowance is deemed appropriate, it should be as a new grade. For example, instead of "U.S. No. 1," it would be "U.S. No.1 High Shatter."

However, even without any changes to the grades, sellers are not currently prohibited from selling grapes with high shatter. That is, the grades are not keeping product off the market. Sellers are free to represent their grapes as "high shatter" and buyers are free to buy them. So, we do not feel it is appropriate to change the current grade standards and thereby downgrade the industry's and consumers' perception of table grapes in general.

In addition, more shatter can increase moisture in a pack and thus increase disease pressure and start the decay process quicker. So it's not as though a high-shatter pack is otherwise equivalent to a regular-shatter pack just because all the fruit will move from the store's shelves.

Sincerely,

Dan Gerawan