Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
300 12th Street, SW
Room 102 Cotton Annex
Washington, DC 20250

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01-030N 01-030N-42 Robert F. Rosa

Re: Docket number 01-030N

Industry Petition to Postpone the Effective Date of Regualtions Limiting and Requiring Labeling for Retained Water in Raw Meat and Poultry Products

These comments SUPPORT THE ABOVE REFERENCED INDUSTRY PETITION

The poultry has not had sufficient information to begin complying with the regulation because it was not until July 2001 when FSIS responded to the industry's generic protocol.

The one year compliance time is insufficient to complete the required four steps:

- protocol submission and review
- data collection to validate unavoidable moisture absorption
- data collection to obtain moisture retention for individual products
- design and printing of new packages and labels

Implementation of this regulation as scheduled would have a significant detrimental economic impact on the poultry industry, the supporting industries, and the US economy.

Cordially,

Robert F. Rosa

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