



United Egg Producers

UEP Headquarters
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DOCKET 04-034N
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UEP Officers

Mike Bynum, Chairman
Al Pope, President
Roger Deffner, First Vice Chairman
Dolph Baker, Second Vice Chairman
Bob Krouse, Treasurer
Gary West, Secretary

November 8, 2004

UEP Staff

Al Pope
President

Gene Gregory
Sr. Vice President

Linda Reickard
Vice President

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

Irving Isaacson, Esq.
UEP General Counsel

Re: Docket Number 04-034N
Food Safety and Inspection Service

Washington Office

Ken Klippen
V.P. Government Relations

Dear Sir or Madam:

Michael McLeod, Esq.
Washington Counsel

The United Egg Producers and United Egg Association are requesting an extension of the November 15, 2004, deadline for filing comments on the referenced docket. The reasons for our request are outlined in the attached November 5, 2004, letter to Dr. Barbara Masters, Acting Administrator, Food Safety and Inspection Service.

Randy Green
Sr. Government Relations Rep.

Egg Nutrition Center

Dr. Don McNamara
Executive Director

Sincerely,

Howard M. Magwire
Director of Government Relations
United Egg Producers/United Egg Association

Dr. Hilary Shallo
Director of Food Safety Programs



Official U.S. Council Representative

Attachment



ND: 4834-2154-7008, Ver 1

Washington Offices

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November 5, 2004

Dr. Barbara J. Masters
Acting Administrator
Food Safety and Inspection Service
United States Department of Agriculture
1400 independence Avenue, SW
Washington, DC 20250-3700

Dear Dr. Masters:

The United Egg Producers (UEP) and United Egg Association (UEA) Further Processor Division are requesting an extension of the comment period on Docket Number 04-034N "Salmonella Enteritidis in Shell Eggs and Salmonella spp. in Liquid Egg Products Risk Assessments."

The October 5, 2004, notice of public meeting and availability of draft risk assessments requested comments on the draft documents by November 15, 2004. We are requesting an extension of this date to provide a 90-day comment period. These risk assessments are extremely important to the egg and egg products industries. As stated in the October 5 notice, the Food Safety and Inspection Service will use the scientific information provided in them to develop pathogen reduction lethality performance standards that the Agency intends to propose for pasteurized shell eggs and pasteurized egg products. In light of our mutual desire to assure the safety of eggs and egg products, we believe sufficient time should be provided for the industry and others to perform a careful scientific review of the risk assessments.

With over 210 pages in the text of the risk assessment and an additional 382 pages in the annex section, it will take a significant amount of time and industry effort to respond to the data and estimates provided. None of these documents were available before October 18, while annexes B, C, D, E, G, H and I were only available the week of October 25 and Annex F is not yet available. Therefore, the Agency has not provided an adequate or reasonable opportunity for public comment. In addition, it would be helpful if the FSIS national baseline

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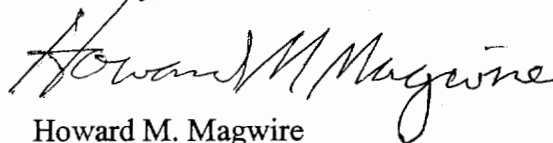
Dr. Barbara J. Masters
November 5, 2004
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survey to measure Salmonella levels in liquid egg products produced in the United States were available publicly for review during the comment period, but such is not the case.

UEP and UEA also request that FDA's comments and any outstanding comments from peer reviewers be incorporated into the documents before the end of the public comment period. We believe that it is important for the industry to review the documents again after those changes are made. Again, if this does not occur, it seems that a reasonable opportunity for public comment has not been afforded.

Thank you for your consideration of our request for an extension of the comment period.

Sincerely,



Howard M. Magwire
Director of Government Relations
United Egg Producers/United Egg Association

cc: Mr. Philip Derfler
Assistant Administrator
Office of Policy, Program, and Employee Development
U.S. Department of Agriculture