

May 22, 2002

The Honorable Philip M. Crane
Chairman, Subcommittee on Trade
Committee on Ways and Means
1104 Longworth House Office Building
Washington, D.C. 20515

The Honorable Sander M. Levin
Ranking Member, Subcommittee on Trade
Committee on Ways and Means
1106 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Crane and Ranking Member Levin:

In response to the Subcommittee's request for written comments from parties interested in technical corrections to U.S. trade laws and miscellaneous duty suspension proposals, I am writing to you in support of two very important bills; H.R. 4447 and H.R. 4448. Both of these bills would suspend temporarily the duty on certain prepared or preserved artichokes (HTS 2005.90.80.00 and HTS 2001.90.25.00 respectively), thereby helping Star Fine Foods to reduce costs incurred as a result of the high duty rates assessed on these products.

Star Fine Foods is based in Fresno, California. We recently purchased the Cara Mia brand from Artichoke Industries, Castroville, California. To our knowledge, this was the last U.S. producer of processed artichokes. We now import both the Cara Mia brand and Star brand artichokes from Spain. We are working on several new products including an artichoke salad in a jar, which combines imported artichokes with other vegetables. This product would be processed and packed in Fresno.

Currently, processed artichokes imported into the United States face between 10.2% and 14.9% in duties. Star Fine Foods imports approximately \$2 million of processed artichokes and we pay approximately \$220,000 each year. There currently are no U.S. companies manufacturing processed artichokes, and artichokes that are grown in the United States are sold in the fresh market and thus are not affected by the importation of prepared artichokes. We do not believe that there will be any significant increase in imports of artichokes with a duty reduction as artichoke consumption is primarily used as a specialty "gourmet" food for family gatherings and entertaining.

Given that the high duties faced by Star Fine Foods are not being justifiably assessed to protect a U.S. industry, we hope that the Subcommittee will favorably report these two bills as part of the miscellaneous trade package in the coming months. Also, the bills are designed as a temporary suspension should any U.S. manufacturing operation become established.

Mr. Torricelli has introduced companion legislation in the Senate, and we therefore will be working with Senate Finance on their miscellaneous tariff bill process.

Thank you very much for your consideration of this matter, and please feel free to contact me if you have any questions on these provisions or require additional information.

Sincerely,



Stan Lewczyk
President/CEO