



**TEXAS
CATTLE
FEEDERS
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October 9, 2001

1008

FSIS Docket Clerk
Docket #00-36A
U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102, Cotton Annex Bldg.
300 12th St., S.W.
Washington, D.C. 20250-3700
Fax: 202/205-3625

Dear Docket Clerk:

Texas Cattle Feeders Association (TCFA) appreciates the opportunity to comment on the need for further clarification concerning the definition of "United States cattle" and "United States fresh beef products".

TCFA strongly believes that the current labeling program of "Product of the U.S.A." has worked well. Such labeling should include any cattle that have been in the U.S. for a period of 100 days or more. This requirement would ensure that the animal was fed and processed in the U.S. -- steps which contribute the majority of the value as purchased by the consumer. The process also provides adequate time and USDA oversight to ensure proper food safety practices are followed.

Current "Product of the U.S.A." labeling standards have been applied for many years to both export and domestic beef markets and there is not an overriding need to complicate the program and increase costs that will be borne by producers, processors and consumers. We are not aware of requests from domestic or export customers to change labeling.

Thank you.

Sincerely,

Ross Wilson
Vice President