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December 4, 2001

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FSIS Docket Clerk
Docket#01-018P
Room 102 Cotton Annex
300 C Street SW
Washington DC 20250-3700

01-018P
01-018P-21
Richard Mold

Re: Proposed Rule – Elimination of the Pizza Standard

Gentlemen:

Luigino's, Inc. is a major processor of frozen entrees and related frozen foods, including several varieties of USDA-inspected frozen pizza. These are for sale in the United States, as well as several varieties that are produced for export to Australia and/or to Canada.

We wish to go on record as enthusiastically supporting the proposed rule which will eliminate the existing standards of identity for USDA-inspected pizzas.

We have no formal information or data to present, but agree the marketplace should be the ultimate arbiter of success or failure for a product. If the product fails to meet consumer expectations, they will not make a second purchase. Because of this, and because few consumers have a working knowledge of the current standards, we submit that it is not relevant to require the labeling to include the percentage of meat or poultry in the pizza. In the absence of knowledge of the present requirements (which would become the old, non-existent requirements), there is no basis of comparison. Percentage labeling would be irrelevant at best. More likely, it would be confusing.

We further agree that the current regulations represent barriers to innovation. Many "pizzas" are now available to the public that do not contain tomato sauce. It simply does not make sense to permit a meatless product to be called a pizza, and yet forbid an otherwise identical product that has meat to not be called a "pizza".

Thank you very much.

Yours truly,

Richard Mold
Manager of Technical Services

053 **Luigino's, Inc.**

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