Theo's Foods, Inc.

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To Whom It May Concern:

Theo's Foods is a small family owned business and employs approximately 25 people. Theo's Foods is a USDA Plant # 18030. We manufacture strombolis and pizza products.

We have been producing frozen pizzas since 1957 that are sold retail through grocery stores. We also market *our* frozen pizza to Fund-raisers (Schools, Sports Teams, etc. that resell them to make money).

Due to my 40-year experience with frozen pepperoni pizza I totally disagree with the 10% standard rule now in place and want this regulation dropped. The standard size frozen pizza for the retail industry is approximately 12 inch in diameter. From experience, 1 ounce of sliced pepperoni will adequately cover a 12-inch pizza.

There are several companies that produce a 1-ounce pack of sliced pepperoni with 16 slices for that reason.

It takes 4 to 5 ounces of pizza sauce and 4 to 5 ounces of cheese to cover a 12-inch pizza. If you use an 8-ounce crust you would have a minimum weight of 16 to 17 ounces. At the current rule of 10% mest you would use 1.6 to 1.7 ounces of meat which is much more than is needed to cover the pizza, as would relate to a pizzaria pizza who are not subject to this rule.

If you want to offer a thick crust pizza that weighs 12 to 14 ounces and add extra cheese your weight then becomes 12 to 14 ounces for crust 4 to 5 ounces for sauce and 5 to 6 ounces for cheese or a total of around 23 ounces. Your meet weight must now be 2.3 ounces or more. You are being forced to put over twice as much topping on a 12-inch diameter pizza than is necessary. Just because you increased the thickness of your crust and added a little more cheese.

Pizza producers forced to comply with the 10% rule start scaling back on quality (thinner crust, imitation cheese, etc.) to offset the cost of the meat topping.

In the free enterprise system the market should be consumer driven. If a company chooses to put too small an amount of pepperonion a pepperonipizzaso it lacks the coverage or has less topping than the competition the consumer will not buy that product. It would serve the USDA well to drop this regulation and let the consumer decide which product to buy.

Ted Atanasoff

President