



OK INDUSTRIES, INC.

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November 6, 2001

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

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01-030N
01-030N-142
Randall W. Goins

Re: Docket #01-030N

Dear Sir:

We support the petition filed by the National Chicken Council, the National Turkey Federation, the American Meat Institute and the National Food Processors Association requesting the agency to extend the effective date of its moisture retention regulation to August 1st, 2004. The proposed compliance date of January 9th, 2002 is not possible for our company to meet.

It was not until July, when FSIS responded to the industry's generic protocols and published its "pre-implementation procedures" that the poultry industry had sufficient information to begin complying with the regulation. Six of the twelve months compliance time was lost.

Compliance with the regulation requires the completion of four steps, which can only be done consecutively, not concurrently (i.e., protocol submission and review, data collection to validate unavoidable moisture absorption, data collection to obtain moisture retention for individual products, and the designing and printing of new packages and labels). Given the volume involved in each of these steps, as discussed in the petition, the one year compliance time frame provided in the regulation is insufficient even if the poultry industry had been able to use all twelve months.

It would be unfair to the industry and the consumer to not grant the extension. Without a reasonable extension, most, if not all, of the poultry industry would have to shut down.

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This could force many companies to go out of business. It would also deprive consumers of having access to wholesome, nutritious, and economical poultry products. Since nothing will change, from a consumer's perspective, if a postponement is granted; the only negative impact on the consumer is if a postponement is not granted.

Respectfully submitted,
O.K. Industries, Inc.,

Randall W. Goins

Randall W. Goins
Vice Chairman

cc/RWG
cc/M. Schilling/ O.K.
cc/George Watts/ NCC