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U.S. DEPARTMENT OF AGRICULTURE

November 7, 2001

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To: Docket Clerk
United States Department of Agriculture
Food Safety Inspection Service

01-030N
01-030N-143
Larry Blackstone

From: Larry Blackstone

Re: Moisture declaration on labels

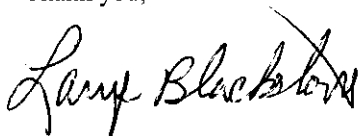
I would request a delay in implementing this rule, because many poultry plants will be going to the HIMP processing early in the coming year 2002.

If plants choose to increase line speeds the protocol that were submitted earlier will not be accurate to the events involved of changing our production from SIS or NELS because more chickens will be entering the chillier per minute: therefore causing us to have improper moisture absorption/pick-up on the labels that will be required by January 9, 2002.

This would pose an undue burden on the poultry industry to be changing labels twice within such a short period of time and will be putting an additional cost that we should not have to incur.

For over 30 years this has not been an issue but the beef industry has made it one. When will they come under scrutiny for temperature controls like the poultry industry?

Thank you,



Larry Blackstone