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To: United States Department of Agriculture, Food Safety and Inspection Service

From: Keith Lipford
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Tyson Foods, Inc.
Stilwell, OK

Subject: Support for the Citizen's Petition extending the effective date of the new Moisture Regulation.

01-030N 01-030N-150 Keith Lipford

I am hereby stating my support for the Citizen's Petition extending the effective date of the new Moisture Regulation. I give this statement for the following reasons:

1. Not all plants have laboratories sufficient to carry out this regulation.
 - a. The plant does not do Salmonella spp. Testing – this will have to be sent out to corporate laboratory, which could not complete all testing on time.
 - b. Most plant laboratories are not equipped with a drying oven. The ovens would have to be purchased. Addition and training of personnel would be required to perform dry matter determinations.
 - c. Structural changes would have to be made in order to accommodate the drying oven.
2. There is a limited amount of label making capacity to supply the vast number of plants with new labels. Some plants would almost certainly be unable to acquire a sufficient supply of new labels.
3. Failure to extend the effective date would drastically affect consumers.
 - a. It would effectively shut down the poultry industry, eliminating a healthy choice of protein the consumer can purchase.
 - b. The increased demand of other proteins would drive a price increase affecting the consumers' budget and the American economy as a whole.
 - c. All of the support industries such as trucking would likewise be affected.
 - d. Tax revenues would be cut through job reduction.
 - e. Many jobs would be lost causing increased unemployment, and a reduction in spending which would encourage economical depression.

Due to the reasons stated above, I believe it would be in the best interest of the consumer, the industry, and absolutely in the best interest of our great nation to extend the effective date of the new Moisture Regulation.

Concerned Citizen,

Keith Lipford