



April 7, 2007

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

07 APR 10 10:11:02
FOOD SAFETY AND INSPECTION SERVICE
U.S. DEPARTMENT OF AGRICULTURE

Reference: FSIS – 2006 - 0030

Dear USDA:

The following comments are in response to the proposed rule to add Chile to the list of countries eligible to export poultry products to the United States.

Case Farms is opposed to the proposed rule. Our company operates two poultry processing plants in North Carolina and one in Ohio with over 2,000 employees.

Our concerns are:

1. The rule states that the imported product will be subject to re-inspection at U.S. ports of entry:
 - Will the inspection be random or 100 %?
 - What will be the cost of re-inspection?
 - Who will bear the cost of re-inspection?


2. Bio Security:
 - If inspection is less than 100%, the danger of food borne disease and the potential for terrorism would be increased.
 - Large batches, uniform mixing and ready-to-eat foods are all elements making foods more vulnerable to terrorism.
 - In 1989 there was a threat of cyanide contaminated Chilean grapes coming into the U.S. which resulted in \$20 million in lost revenue.
 - In May of 2002 Avian Influenza was found in flocks of chickens and turkeys in Chile.

Page 2

There are many challenges facing the U. S. food industry today. We do not need to add to these challenges.

Again, Case Farms is opposed to the proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Kenneth L. Wilson". The signature is written in a cursive style with a long, sweeping underline.

Kenneth L. Wilson
Director of Public Relations and Compliance