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URGENT  
 FOR YOUR REVIEW  
 REPLY ASAP  
 PLEASE COMMENT

3

DATE: 11/17/2003

FAX: 690 0486

PAGE 1 OF 3

TO: DOCKET OFFICE

FROM: BRIE WILSON

99-017P  
99-017P-3  
Brie C. Wilson

COMMENTS:

A HARD COPY OF THESE COMMENTS WILL BE  
MAILED TODAY VIA USPS.

THANK YOU-

**MARK YOUR CALENDAR!**

**2004 Annual Convention**

**February 8-10**

**Savannah, Ga.**

**Westin Savannah Harbor Resort and Spa**



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November 17, 2003

FSIS Docket Clerk  
DOCKET 99-017P  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Room 102  
Cotton Annex, SW  
Washington, DC 20250-3700

RECEIVED  
FSIS DOCKET ROOM  
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**Re: Proposed Rule on Poultry Classifications**

The National Turkey Federation (NTF) respectfully submits these comments in response to the Food Safety and Inspection Service's (FSIS) Proposed Rule on Classes of Poultry (September 29, 2003). NTF supports the efforts of FSIS to update the definitions and standards for the official U.S. classes of poultry; however, we believe some of the changes are unnecessary and prohibitive.

NTF is the only national trade association representing the turkey industry exclusively. NTF represents nearly 100 percent of the United States turkey industry, including processors, growers, breeders, hatchery owners, and allied industry. Since our members produce innumerable turkey products for public consumption, they are concerned about any regulations that modify how they label those products.

While we completely understand and respect the agency's efforts to modernize the poultry classifications, we have serious concerns that some of the proposed changes are unnecessary. Specifically, we disagree with the agency's proposed change to the definition of young turkey reducing the processing age from under eight months to less than 6 months.

According to the Federal Register Notice, the change is proposed because the definitions do not reflect today's poultry characteristics or current industry practices. We understand that poultry class standards are used to ensure poultry products are labeled in a truthful and non-misleading manner, but this change of reducing the age of young turkeys by two months seems to reduce a company's flexibility while providing little or no benefit to the consumer.

Simply because a turkey processed as a "young" turkey is slaughtered normally at six months of age, does not in and of itself justify the proposed modification to the poultry



classifications. We would argue that the classifications for young turkeys should not be altered, and should remain defined as under eight months.

Reducing the age requirement to under six months would place an undue burden on those companies who currently process young turkeys that are either close to or older than that age. It should be noted that we have heard from several companies that would be dangerously close to exceeding or simply would not meet the proposed age requirement. We encourage you to reconsider the proposed modification to the young turkey definition.

Aside from the objection noted above, we support the additional proposed changes to the definitions of turkey classes in the proposed rule.

We applaud the FSIS initiative to update the classes of poultry in order to ensure accurate labeling and marketing of products. We respectfully submit that including the modification suggested above will prevent the revisions from being undeservedly burdensome on industry.

As always, we appreciate the opportunity to comment and look forward to working with the agency on this matter in the future.

Respectfully submitted,

A handwritten signature in cursive script that reads "Brie C. Wilson".

Brie C. Wilson  
Manager, Government Affairs