



PERDUE FARMS INCORPORATED
P.O. Box 1537, Salisbury, MD 21802-1537

Home Office: 410 543 3000

December 30, 2003

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UPS NEXT DAY AIR

FSIS Docket Clerk
USDA, FSIS
Room 102
Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

99-017P
99-017P- 5
Herbert D. Frerichs, Jr.

Re: Docket #99 – 017P

Dear Sir/Madam:

I am writing on behalf of Perdue Farms Incorporated in response to the Food Safety and Inspection Service (FSIS) proposed change to amend the definitions and standards for the official U.S. classes of poultry so that they more accurately and clearly describe the characteristics of poultry in the market today.

We request the U.S. Department of Agriculture (USDA) to delay the implementation of this rule change until a complete and thorough study of the consumer public is conducted to determine the impact of this rule change as it relates to their usage and understanding of poultry products.

The poultry industry developed the "Roaster" breed over 30 years ago as a bird specifically bred for larger size. Current poultry classification defines the Roaster as a chicken three (3) to five (5) months of age. The new proposed ruling amends this definition to a chicken less than twelve (12) weeks of age.

Both of the above definitions fail to accurately identify a "roaster" in today's marketplace. Classification based solely on age standards only leads to confusion at the wholesale and retail level; thereby weakening the positioning of the "Roaster" and undermining value.

The proposed definitional change of less than twelve (12) weeks will allow younger and therefore smaller broilers to be classified as Roasters. This merging of classifications will result in confusion as customers throughout the distribution chain may purchase smaller than expected chicken called "Roasters." It is also reasonable to conclude that this confusion in definition will mislead the consumer to think they are purchasing a product that is greater in size and value than the product they are

purchasing. Therefore, consumers purchasing "Roasters" may or may not be getting the value of the large meaty chicken they expect. We believe consumers would be better served through a more accurate definition of what is a "Roaster."

The following, proposed Roaster Classification guidelines more accurately represent the classification standards for "Roaster."

ROASTER CLASSIFICATION

- A chicken that is between nine (9) and twelve (12) weeks of age at time of process;
- A chicken that comes from an average, minimum daily flock weight of eight (8) lbs. minimum; and
- A male chicken.

This classification when provided to the consumer accurately defines a poultry product that the consumer can clearly understand in value and size unlike the definition put forth in the proposed change. In today's environment intent to provide the consumer the most accurate information available, it is only appropriate that the definitions used by the USDA accurately define a "Roaster."

Therefore, on behalf of Perdue Farms and in the interest of the American consumer we urge the USDA to develop a classification standard for "Roasters" that accurately reflects the needs and wishes of the consumer. In order to properly affect this result we urge the USDA to undertake the appropriate studies in consultation with the consumer and the industry to craft a classification standard that truly and accurately reflects a "Roaster."

In advance, thank you for your time in reviewing this submission and for your consideration of our request. If you have any questions please free to contact me.

Sincerely,

PERDUE FARMS INCORPORATED

By: 

Herbert D. Frerichs, Jr.
General Counsel

HDF:dwr

cc: Bryan Hurst