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Fibre Box Association

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July 7, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852

Subject: **Fibre Box Association (FBA) Support and Endorsement of the American Forest and Paper Association's (AF&PA) Comments Concerning FDA Docket No. 02N-0277, Proposed Regulations for Establishment and Maintenance of Food Records**

Dear Sir or Madam:

The Fibre Box Association (FBA) is the manufacturer's trade association representing and servicing and corrugated paperboard packaging industry. Our industry manufactures and markets corrugated products primarily consisting of packaging and shipping containers. FBA represents over 90% of the corrugated packaging production in the United States.

The purpose of this communication is to advise that the Fibre Box Association endorses the American Forest and Paper Association's (AF&PA) comments submitted to FDA on June 30, 2003 (copy attached) regarding the Proposed Regulations for Establishment and Maintenance of Food Records, FDA Docket No. 02N-0277.

FBA participated with AF&PA in the development of the comments concerning this proposed regulation and strongly endorses and supports AF&PA's reasoning and request that the Food and Drug Administration consider the full impact of the proposed regulations on our industry.

Rather than impose inappropriate requirements that will impact our industry at a significantly higher level than that estimated by FDA, we urge that the record keeping requirements begin with the receipt of the materials at the first logical point in the supply chain

FBA appreciates the opportunity to provide this letter of support and endorsement. Please contact me if you have any questions regarding this matter.

Sincerely,

James F. Nolan
Senior Vice President

Cc: John L. Festa, AF&PA
Sergio Galeano, Georgia-Pacific

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