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AGRICULTURAL TRANSPORTERS CONFERENCE

Fletcher R. Hall
Executive Director

September 11, 2002

Docket No. 02N-0276
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

**Public Health Security and Bioterrorism
Preparedness and Response Act of 2002**

To Whom It May Concern:

The Agricultural Transporters Conference of American Trucking Associations is a national organization, which represents the interests of the commercial transporters of agricultural commodities and farm supplies.

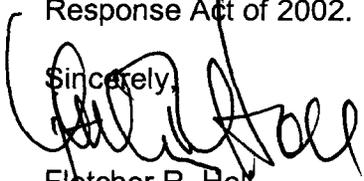
The Agricultural Transporters Conference has the following concerns regarding:

Section 305. Registration of Food Facilities (domestic and foreign). It would appear that this section, as written, applies only to a "factory, warehouse, or establishment ...that manufactures, processes, packs, or holds food."

Regulations should clarify if this section applies to commercial agricultural transporters of agricultural commodities, such as produce, livestock, grains, etc. Regulations should provide a more specific definition of "holds food." For example, when a commercial agricultural carrier holds a load of "food", such as carrots, being transported from the field to the primary processing facility, and for any number of reasons, cannot unload until the next day, does this overnight stay require the registration of the carrier (transporter) under Section 305? Should a load have to be returned to the freight yard overnight does this mean that each trucking company facility must be separately registered? It should be noted that these commercial carriers are registered with the United States Department of Transportation and have assigned USDOT numbers. More specific definition of "foods" and "holds foods", as well as a clarification that the "transporting of food" does **not** require duplicative registration under this section, is required in the regulations.

The Agricultural Transporters Conference of American Trucking Associations appreciates the opportunity to comment on The Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

Sincerely,


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