

MONTY PRODUCE CO.

P.O. Box 636 100 East 11th Street Monticello, Iowa 52310

Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

(Docket Nos. 1996P-0418, 1997P-0197 1998P-0203 and 2000N-0504)

Dear Sir or Madam:

I am writing to comment on the proposed rules on Salmonella Enteritidis in shell eggs. I am an egg processor and marketer that has production in Mankato Minnesota, Harmony Minnesota, Hopkinton Iowa, Sumner Iowa and Farmersburg Iowa.

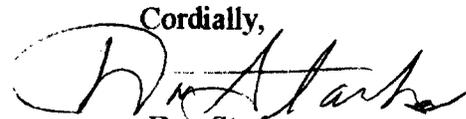
Our birds are vaccinated against SE. We feel this should be considered mandatory for all birds. Tracing a positive isn't a problem with the I.D. requirement on packaged eggs.

1. Our eggs are cooled to 55 degrees F when gathered, moved to the grading station in three to seven days, washed, candled, graded and packed. At this point they are held at 45 degrees F. And the interior temperature is approximately 55 degrees F when entering the cooler.
2. In line operations go immediately on line to washers, candling and packing. The interior temperature is approximately 90 degrees F and will be 90 degrees F when packed and placed in the 45 degree F cooler. It takes many days to reduce the interior temperature to the 55 degree F temp as in No. 1 when packed in cartons and cases. Number 1 got the temp out of the egg faster. However were we required to reduce the temp to 45degrees F before washing and packing, a large number of cracked eggs would result because of the temperature difference.

This proposed requirement would put us in an impossible position. After 90 years and 4 generations of being in the egg business, we have already notified our contract producers that we will be terminating our business relationship and selling our accounts to an in line packer, if this requirement is passed. I feel a vaccination program is the number one priority, making the house checks less important. The temperature requirement in the proposal, to say the least, needs to be reworked.

Finally, I would find it hard to believe that an egg industry person would have agreed with, or been involved with the writing of such a proposal.

00N-0504

Cordially,

 Don Starks CISI

"Four Generations of Quality"