

December 19, 2005

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852

1 2 4 6 5 DEC 27 A9 51

Re: Docket No. 2002N-0273, Substances Prohibited From Use in Animal Food  
or Feed

To Whom It May Concern:

I am a plant manager for Baker Commodities in Billerica, Massachusetts. I have been in the rendering business all my life and for the last 15 years a plant manager for Baker Commodities.

I have several questions regarding new changes to the feed ban.

1. The current feed ban of 1997 is working, is it not?
2. Who will handle dead or down cattle and at a cost to whom?
3. Who pays for setting up separate rendering facilities and what economic study has been done to make this a viable option?

I think it is obvious that the United States does not have a BSE problem, and on the unlikely hood that an infected animal is detected, it has been proven that between the renderer and packing plants that the current countermeasures work extremely well.

I feel that the new changes are a selling platform for the chicken and meat producers, but fall short on the big picture of taking care of meat by-products in the United States for which there is low risk of BSE anyway.

Sincerely,

Walter Gurschick Jr.  
Plant Manager  
Baker Commodities Inc.  
Billerica, MA Division

2002N-0273

C 503