

Law Offices
Edison W. Dick
Suite 1111
1828 L Street, N.W.
Washington, D.C. 20036-5109

March 1, 2005

Division of Dockets Management (HFA-305)
Food & Drug Administration
5630 Fisher's Lane, Room 1061
Rockville, Maryland 20852

BY FEDERAL EXPRESS

Re: Docket #2002N-0278

Dear Sirs:

Enclosed is the documentation submitted by the Canadian Ship Suppliers Association (CSSA) with respect to the final rule on prior notices (Document #2002N-00278). Please make these documents part of the final record.

The Canadian Ship Suppliers Association believes that it should be exempted from the prior notice requirements of this final rule. The shipments of these companies in question are only for export and cannot be used in any other manner. The shipments are checked at the port of entry in the United States and sealed by U.S. Customs officials. They are only unsealed by U.S. Customs personnel at the U.S. Port where they are placed on the vessel for export. These items are under U.S. Customs seal for the entire time that they are within the United States.

The attached documents constitutes proof of the foregoing and are the basis for the CSSA contention these types of shipments should not be covered by the final rule on prior notice.

02N-0278

C 367

Division of Documents Management (HFA-305)

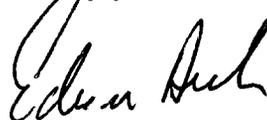
Page Two

March 1, 2005

If necessary the final rule on prior notice should be modified to take into account the extensive time and resources required by Canadian companies to complete the detailed forms for every single listing of food and other items under the prior notice requirements.

Thank you for your consideration of this submission and the attached documentation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Edison Dick". The signature is written in a cursive style with a large initial "E".

Edison W. Dick
Counsel for the
Canadian Ship Suppliers Association

cc: Robert Zeagman
Theresa Cardinal
Patrick McMahon