



FRONT RANGE SEED ANALYSTS

1111 South Mason St., Fort Collins, CO 80521-4500

April 19, 2006

Deborah J. Lionakis Meyer
Plant Pest Diagnostic Center
3294 Meadowview Road
Sacramento, CA 95832-1448

Dear Ms. Meyer,

Members of the FRSA attending our April business meeting reviewed, discussed and voted on a select number of the 2006 Rule Change Proposals. The membership in FRSA is represented by seed analysts with AOSA and SCST laboratory affiliations. Review comments are the consensus of members present, unless noted by a member's name, at the April business meeting and may not represent the views of all FRSA members.

The ten FRSA members at the April 12, 2006 business meeting discussed and voted as follows:

Proposal #1: Comments: Paired tests should be required if the analyst deviates from the rules.
Reservations: Physical capabilities of a lab to do paired tests may be limited by equipment constraints of the lab.
Votes: Seven members support the proposal, 3 did not.

Proposal #5: Reservations: Most of the large species would be very clean and the need for extra seed would not be so great. The exception is linted cotton. Linted cotton could easily have more weed seed because it is not free-flowing and cannot easily be cleaned. In the case of linted cotton, the larger amount for a noxious weed exam would be advisable. Also, it was thought that companies would be unwilling to send the extra amount for these species. The risk of missing noxious weeds in the free-flowing large seeded species (except linted cotton) is of lower importance than the expense that this proposal would have for seed producers.
Votes: One for the proposal; 9 against.

Proposal #7: Votes: All ten members supported the proposal.

Proposal #21: Votes: All ten members supported the proposal.

Proposal #24: Votes: All ten members voted against this proposal.

Proposal #25: Comments: Under Revised Section 11,j. “as determined by sender” should be added as it is the sender’s responsibility to indicate treatment. Under the revised Section 11, “I” is not necessary as all requested exams are clearly marked. It is recommended that the entire Section 11 be reviewed by the committee and submitted next year.
Votes: 1 member supported the proposal: 9 voted against the proposal.

Proposal #29: Votes: All ten members supported the proposal.

Thank you for the opportunity to express the FRSA opinions on the proposed 2006 rule changes.

Sincerely,

Diedra Peck
FRSA secretary