

Mr. Roger Hinkle, Chief
Licensing Authority Branch
Warehouse and Inventory Division
Commodity Operations - USDA
Mail Stop-0553 - Room 5968-S
1400 Independence Avenue, SW
Washington, DC 20250-0553

Dear Roger,

Congratulations on the USWA rewrite and proposed Licensing Agreements. They are well thought out and well written.

There is one provision in the grain licensing agreement that I would like to comment on. Item IV, H. Excess Storage and Transferring Grain. The proposed requirements on forwarding grain have changed considerably. As you are well aware, the current regulations allow basically unrestricted forwarding of open storage grain. The proposed agreement requires written permission and non negotiable receipts for all forwarded grain, including open storage.

I appreciate the effort to strengthen accountability of forwarding. However, I foresee a number of instances these requirements will put an onerous burden on warehouse operators that routinely forward and on some that store the forwarded grain. I believe accountability can be insured through strengthened examination procedures without additional regulation.

I would personally prefer regulations that mirror those currently in effect. The proposed requirements for forwarded grain that is warehouse receipted, but not for open storage grain.

Sincerely,


Robert Brown
USWA warehouse examiner

