

Oklahoma Texas Panhandle Compress, Inc.

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Mr. Roger Hinkle, Chief
Licensing Authority Branch
Warehouse and Inventory Division, FSA
USDA, STOP 0553
1400 Independence Avenue, SW
Washington, DC 20250-0553

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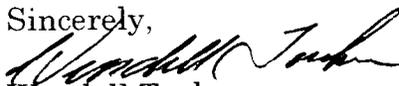
Dear Roger,

In regard to the proposed rules for the U. S. Warehouse Act, I would like to make the following comments. I am the General Manager for Oklahoma & Texas Panhandle Compress, Inc. We operate six warehouse locations in the West Texas & Northern Rolling Plains of Texas. We are active members of the Cotton Warehouse Association of America, as well as the National Cotton Council of America.

Currently, each warehouse can have only one Provider. The proposed rules do not include this requirement. I strongly oppose allowing a warehouse to have more than one provider at any time. I believe the rules need to be very specific in stating that restriction. If, for whatever reason, one of the six warehouses that I manage had to have two Providers simultaneously, then we would experience a tremendous problem trying to keep proper records of receipts issued for a single bale. Our warehouse system does not allow us the use of multiple providers for the same code, and we would have to re-write software also. All this can be prevented by restricting each warehouse to a single Provider as it is currently.

I also have a concern about Providers who offer other services in the industry and seem to "create" problems for other Electronic Receipt Providers. I think the rules (not just the agreement) needs to include a statement of some kind which states that a Provider will operate without conflict of interest which might prevent that Provider from always putting the needs of its customers first. An entity that provides Electronic Receipts should provide the necessary means for any entity using their receipts to operate smoothly. If you would like further comments, please give me a call. Thanks for all the effort you have given the re-write of the U. S. Warehouse Act.

Sincerely,


Wendell Tucker

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