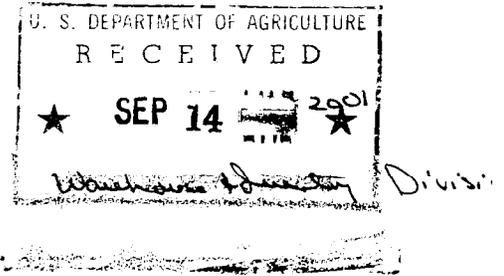




Suite 210, 1110 N. Glebe Road, Arlington, VA 22201 USA  
Phone: +1 (703) 516-4346 Fax: +1 (703) 516-4350 www.nfpa.org



September 12, 2001

United States Department of Agriculture,  
STOP 0553,  
1400 Independence Avenue, SW.,  
Washington, DC 20250-0553

Attn.: Roger Hinkle, Chief, Licensing Authority Branch, Warehouse and Inventory  
Division, Farm Service Agency (FSA)  
Subject: Federal Register  
66 FR 46310  
Proposed Rule  
7CFR Chapter 700  
Part 735-Regulations for the United States Warehouse Act

Dear Mr. Hinkle,

Please consider the following comment on Exhibit A Draft:  
IV Duties of the Warehouse Operator

C. Records To Be Kept in a Safe Place

The warehouse operator agrees to:

1. Provide records protection equipment such as a fire rated safe, vault or compartment, in accordance with NFPA 232-2000 "Standard for the Protection of Records" (enclosed) ~~a fireproof safe, a fireproof vault, or a fireproof compartment~~ in which to keep, when not in use, all records, books, and papers pertaining to the licensed warehouse, including a current warehouse receipt book, copies of warehouse receipts issued, and canceled warehouse receipts or microfilm copies of canceled receipts, except that, with the written consent of the Farm Service Agency, upon a showing by the warehouse operator that it is not practicable to provide such records protection equipment ~~fireproof safe, vault, or compartment~~, may keep such records, books, and papers in some other place of safety, in accordance with NFPA 232-2000 "Standard for the Protection of Records" or as approved by the Farm Service Agency.

Reference to this standard provides several protection options to the user, based on the defined importance of the records involved. The standard also provides the flexibility for other protection mechanisms based on the requirements of the Authority Having Jurisdiction or Farm Service Agency in this case.

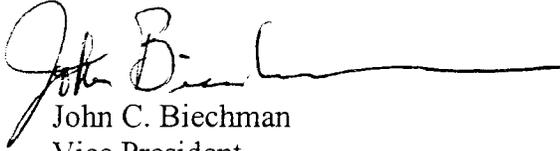
NFPA standards are consensus based, offering the opportunity for input from all sectors of the population. The American National Standards Institute on August 18, 2000 approved this edition of NFPA 232, as an American National Standard.

Washington Office

W-1

On behalf of NFPA International (National Fire Protection Association), I want to thank you for your time and consideration of our comments. If I, or the technical staff at NFPA can provide assistance to you or the Department, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John Biechman", with a long horizontal flourish extending to the right.

John C. Biechman  
Vice President  
Government Affairs  
NFPA International

enclosure