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September 24, 2001

Mr. Roger Hinkle, Chief
Licensing Authority Branch
Warehouse and Inventory Division
Farm Service Agency
U.S. Department of Agriculture
Stop 0553
1400 Independence Avenue, SW
Washington, DC 20250-0553

ROUND SEP 27 2001

Dear Mr. Hinkle:

I would like to share with you my comments on the proposed rules for the U.S. Warehouse Act. Those rules were published in the "Federal Register" on September 4, 2001. I operate a warehouse in Selma, Alabama, and have served in different positions with the Cotton Warehouse Association of America and with the National Cotton Council.

In various cotton industry association meetings I had heard that the rules might contain a statement which required the electronic warehouse receipt and document Providers to operate without any bias toward any user and in an independent manner. I was disappointed to not find such language in the proposed rules. I believe that each Provider should be impartial and I think it should be stated as part of the regulations. I would like to see the final rules contain wording which reflects this. This language should not be burdensome or pose severe constraints. I do not believe any honest Provider would object to this.

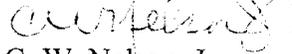
Also, I do not see any restriction in the rules which requires a warehouse to use a single Provider. I do not know whether this omission was an oversight or intentional. As a warehouse operator I do not want the burden of having to deal with multiple Providers for whatever reason. Multiple Providers would likely cause mistakes to occur in warehouse record keeping. I want the rules to say that a warehouse can only have one Provider at any time and that a warehouse can only change Providers once every twelve months.

Finally, I believe that crop year needs to be a required field when creating an electronic cotton warehouse receipt. It is not any burden for me to collect and provide this data. With the New York Board of Trade set to require this information in 2003 I believe that every receipt should have this data associated with it. I would like to see this requirement reflected in the Agreement that the Provider must sign with USDA.

Thank you for considering my comments.

Sincerely,

DALLAS COMPRESS COMPANY



C. W. Nelson, Jr.