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Uncle Ben's, Inc.

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COMMENT

19 November 1999

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OFFICE OF THE SECRETARIAT

Ms. Jean A. Webb, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 Street N.W.
Washington, D.C.

Dear Ms. Webb,

Uncle Ben's, Inc. wishes to inform the CFTC that we are in agreement with the CBOT's position on the proposal which significantly tightens the standards for Stained and Heat Damaged Rice for futures delivery.

Generally, stain and heat damaged rice is a result of improper drying and storage practices within a drying facility. Limited volumes of rice are affected in any given year. This quality change will not materially impact the deliverable supply of rough rice.

A majority of commercial buyers, both domestic and international, for rough and milled rice markets, refuse to purchase stained or heat damaged rice. By tightening the standards for heat and stain, there will be improved correlation between the CBOT price and cash prices, and the futures market will be a more useful hedging and pricing tool.

Uncle Ben's, Inc. supports this necessary change and therefore asks that the CFTC approve the proposal modification.

With kindest regards,

John V. Dornak

John V. Dornak
Commodity Manager
Uncle Ben's, Inc.

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