

March 19, 2010

To Whom It May Concern:

Re: AOSA Rule Change Proposal-No 12

We have reviewed the above referenced proposal with our seed laboratory and a major producer of tall fescue. As a result, we have come to the conclusion that adding blowing points to tall fescue seed and moving the pure seed definition from 21 to 23 is unnecessary and will result in lower quality lots of tall fescue seed. Our reasons for opposing the rule change are:

1. Establishing a firm blowing point does not allow for varying weights of lots of seed from season to season. There is no flexibility. Keeping the current rules allows for manual elimination of double florets and awns under any lot conditions and ensures consistency of product quality through light and heavy years.
2. The establishment of a blowing point will cause awns and double florets to be included in the pure seed analysis as they are heavier and will not blow out. Double florets are considered not viable. As a result, seed conditioners will be able to clean seed to lower than existing standards and still be able to achieve certified or sod quality lots.

Stover Seed services many sod farms in California where tall fescue is the number one grass crop. Sod growers demand and pay a premium for high quality tall fescue seed. Changing AOSA rules on tall fescue will only result in a lower quality product. While the adoption of the new rules would speed up the testing process the sacrifice in product quality is not worth the change. A similar proposal on Creeping Red Fescue was floated years ago and was not passed. Our position is that the current rules are adequate for tall fescue testing and labeling and that there should be no changes.

In view of the above facts we urge that the proposal be rejected. Please feel free to contact me if you have any questions on this issue.

Respectfully,

John McShane
President