

Appendix I

Association of American Seed Control Officials (AASCO)

Letter on Seed Count Rule for Agricultural Seeds

(Letter dated September 11, 2009)

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AASCO

Association of American Seed Control Officials

September 11, 2009

Vicky L. Dempsey, Secretary-Treasurer
Central Weights and Measures Association
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Dayton, OH 45422

Jonelle Brent, Chair of Executive Committee
Central Weights and Measures Association
c/o IL Department of Agriculture
PO Box 19281
Springfield, Illinois 62794-9281

RE: Seed Count Rule for Agricultural Seeds

Dear Vicky and Jonelle:

The Association of American Seed Control Officials (AASCO) supports the methods and acceptable variances to determine seed counts as established in the Association of Official Seed Analyst (AOSA) "Rules for Testing Seed". The Recommended Uniform State Seed Law (RUSL) establishes that the methods used to sample, analyze and test seed shall be those as established by the Association of Official Seed Analysts Rules for Testing Seed.

Seed is a biological unit and as such, it is subject to environmental influences that introduce variation in size and density. Seed cannot be produced utilizing a standardized manufacturing process that controls size and density. Utilizing a process of referee testing and scientific review, The Association of Official Seed Analyst, has established in the Rules for Testing Seed, acceptable testing methods and variances for Corn, Soybeans, Field Beans, and Wheat that are recognized and utilized by state seed control officials in the administration of their respective state seed laws. These standards are also acceptable to the regulated seed industry as a fair and valid means for determining that their products are in compliance with the respective state seed laws.

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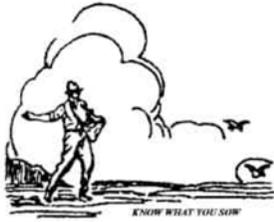
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AASCO

Association of American Seed Control Officials

The Association of American Seed Control Officials is a professional organization of state seed control officials organized in 1945 for purposes of maintenance and amendment of the Recommended Uniform State Seed Law, promotion of uniformity in state seed laws and regulations, and promotion of cooperation between the administrators of the seed laws of the US States, the Dominion of Canada and the Federal Seed Act.

The Association of American Seed Control Officials respectfully requests that NIST adopt the methods and variances used to establish seed counts for Soybeans, Corn, Field Beans and Wheat as established in the Association of Official Seed Analyst Rules for Testing Seed.

Best Regards,

Ronald R. Pence
President – AASCO

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