DIS-TRAN Wood Products, LLC

Sales Office: 4725 Hwy 28 E • Pineville, LA 71360 • Phone: (318) 448-0274 • Fax: (318) 487-8234

Mailing Address: P.O. Box 5109 • Alexandria, LA 71307-5109

12/04/08

Ms. Michele Brooks, Director
Program Development and Regulatory Analysis
USDA Rural Development
1400 Independence Avenue
STOP 1522, Room 5818-S
Washington, DC 20250-1522

RE: Docket No. RUS-07-Electric-0010

Dear Director Brooks,

Please accept these comments as part of your continued review of the referenced docket noted above related to 7 CFR Parts 1728 and 1755. Specifically we reference Bulletin 1728H-701 dealing with Wood Crossarms (Solid and Laminated), Transmission Timbers and Pole Keys.

As with most specification addendums there appears to be several changes to the overall text in order to make this document more concise and clarify several points for the users. This is appreciated by all and we compliment the efforts of those involved. We would however like to request reasoning behind a couple of points and at the same time suggest alternates to the same.

The first point of interest is relative to part "O" Destination inspection, page 56521. The current specification noted that "***when cross sectional tolerances were measured at destination, normal shrinkage allowance shall be considered using the arm's current moisture content and actual size".*** There was then a reference to the average allowances for Douglas-fir and Southern Yellow Pine allowing one percent size change for each four point moisture content change below the fiber saturation point. We find that this method, which has been acceptable within the bounds of all other general wood specifications here in the US and Canada in establishing sizing is proven and has been understood by all of the components of this industry from the mill level down to the final user.

The new specification notes that "***All crossarms shall meet or exceed their minimum dimensions for at least 1 year after date of delivery."*** We are concerned that not only is this change one that will likely prove cost prohibitive, it may prove quite difficult to manage and enforce. Our specific concerns are listed as follows.

1. This product is purchased from US and Canadian mills developing goods for many other types of users as part of a global market. The crossarm product we purchase is a very small portion of these goods that they produce generally

making up less than 10% of their end products. In a few instances, crossarms may make up 35% of the product, but the remaining material still consists of other industry standard sizes. In order to guarantee that a crossarm remains "full sized", regardless of size selected for a period of one year, that wood section would have to be "over-sized" to some dimension that would not readily fit into that mill's current run practices. Therefore, the mills would either be required to cease producing crossarms, or they could look at crossarms as a special product and generate production runs around it instead of developing crossarms as part of their normal operations. Any of this spells increased costs and less availability for our products at best, with a greater possibility that several of the few mills we have today producing arms may elect to simply stop doing so.

In today's economy with mills are already suffering from higher costs of all components such as logs, fuels, labor and overhead items we would prefer to not put an additional strain on them by requesting some "special" products production such as this new requirement would create. Also, as we are faced with more and more competition from alternate products of these wood arms we would prefer to look for methods to keep our industry more competitive and not allow a specification change to push us in the opposite direction.

2. We would also be concerned that this "Exceeding dimensions for at least one year" would suggest that this period could be more than one year. This could also be stretched to be thought to be relevant length of pieces or general grading rules. Therefore, a seasoning check that opened up more than allowable at one year after delivery could be expected to be a cause for failure. In that case, we could spend hours in litigation determining if the material was properly stored by the end user or did they expose this product to some element that hastened the process which caused it to "exceed" some dimension or tolerance within the specification.

3. How would we account for material stored in various climates across the US? We could have material on the ground in Washington state that might remain fairly consistent in size and that same material stored in Phoenix, AZ could change more over the same period.

Suggestion:

Revert to the wording found in the current specification as it has provided effective service to all involved and is most practical in dealing with this product of nature allowing for the already known changes over time. We are not aware of any recorded arm failures or product short comings attributed directly to arm shrinkage, due to continued drying, in this industry.

The second point of interest is relative to the Distribution Crossarm Drilling Guide shown as Appendix B on page 56523. That guide proposed references only two types of arms; a Type 04 and a Type 05M. We have two comments relative to this sheet listed below.

1. Is it the intent of the RUS to eliminate Types 01, 02, 03 and 05 from the current specification?
2. We see note #3 on that drawing is consistent with the current specification is giving a tolerance of any cross section as +1/8" and -0" at time of manufacture. "At time of manufacture" is normal and customary, but would be in direct conflict with my questions in the first point listed in the previous section which requires full size arms one year after delivery. We do not suggest eliminating this note, rather, leave this note in place and remedy the issue questioned in the first point by changing wording as mentioned in part "O" page .

We hope you will take both of these points into consideration as you review other comments on this specification. DIS-TRAN has been a viable supplier to this industry for over forty-four years and I have been a part of its growth for more than thirty years as well. Though we may not fully understand all of the technical reasoning for specifying change in these two areas, we feel that we do represent the practical and commercial side of this industry both from a manufacture and customer alike. Therefore, we would heartily recommend revising this specification maintaining both its technical merits as well as keeping it a commercially viable specification for all involved.

If you have any questions you may contact me by phone at 318-767-5585 or via email at pat.bordelon@distran.com.

Sincerely,

Patrick A. Bordelon
President