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November 19, 2012

Lathrop Smith  
Forest Management Service Center  
2150 Centre Ave. Bldg. A  
Fort Collins, CO 80526-1891

Dear Mr. Smith:

RE: FR Vol 77, No. 202 Notice "Information Collection; Advertised Timber for Sale"

Pyramid Mountain Lumber, Inc., an SBA family-owned forest products company in Seeley Lake, Montana submits the following comments on FR Vol 77, No. 202 Notice "Information Collection; Advertised Timber for Sale".

The proposed Section 16 c states "Timber Sale Volume Disposition – Non-manufacturers: The bidder must estimate that \_\_\_\_\_ percentage of the advertised saw timber from this sale will be sold and/or exchanged to a small business manufacturer". Those of us in small business who depend upon fair markets to survive through the SBA Set-Aside Program cannot accept a simple purchaser's estimate as a due diligence effort by the U.S. Forest Service to implement the Set-Aside Program in conjunction with the Small Business Administration.

All U.S. Forest Service contracts contain specific language in B and C clauses pertaining to Accountability for volume removed. Therefore, all tickets, weights, volumes, and destinations are tracked, accounted for and displayed by load receipt for proper billing on TSA. Therefore, the U.S. Forest Service needs to provide the actual data to SBA and for their own compliance under the 30/70 Rule.

We encourage the U.S. Forest Service to utilize and require mandatory reporting under the Annual Certification of Receipt and Disposition of Timber Originating from National Forest System Lands Form FS-2400-59. The necessary actual data would once again become readily available.

Pyramid Mountain Lumber, Inc. appreciates the opportunity to comment on the proposed changes to Forest Service Bid Forms and reiterates that a simple percentage estimate on disposition to small business manufacturers is not acceptable. Should you have any questions or comments, please contact me at your convenience at 406-677-2201 ext. 27.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. Sanders", written in a cursive style.

Gordon Sanders  
Resource Manager