



3759 Highway 6 P.O. Box 130 Princeton, ID 83857

Phone: (208) 875-1121

Fax: (208) 875-0191

December 3, 2012

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

RE: FR Vol. 77, No. 202, Advertised Timber for Sale
16c Timber Sale Contract Disposition - Nonmanufacturers

Dear Mr. Smith,

Please accept the following comments from Bennett Lumber Products Inc. on the proposed changes to Bid Forms for Advertised Timber for Sale.

Bennett Lumber Products is a family owned company with operations in Princeton, Idaho and Clarkston, Washington. The Princeton mill currently employs 160 workers and is an important contributor to the local economy. The Clarkston mill has been closed since 2008 and will remain so until lumber markets and log supply issues improve. Even when the Clarkston mill is operating at full capacity Bennett Lumber is still classified as a Small Business.

While it has drastically decreased over the recent years, Federal timber is still an important contributor to our supply of logs. We currently have six USFS Sales under contract and another one that has been under appeal since 2008. Our most recent sale purchased was an SBA Set Aside.

Bennett Lumber has some strong concerns over the reporting by nonmanufacturers of volume to be sold/exchanged to a small business manufacturer (16c). We feel this volume should be tracked and based on actual deliveries not an estimate made potentially two to three years prior to delivery that will have no accountability. On one hand the bid instructions state that they want "to **properly** credit the disposition of timber from this sale" while on the other stating the purchaser will " not be bound by this estimated if plans change." All purchasers of Federal timber whether they be big or small business have to much at stake to rely on this type of voluntary on the spot guessing/ reporting.

As purchasers of Federal timber we are contractually required to account for each load of logs removed from a sale, this includes time, date, weights and destinations. The Forest Service does a good job enforcing this accountability and we find no reason why this cannot translate to tracking and recording volume from deliveries by nonmanufacturers.

Thank you for the opportunity to comment on this issue and would welcome the chance to further clarify our position if required.

Sincerely,

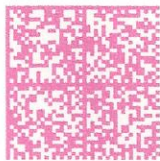
Tom Biltonen
Resource Manager



Box 130 — Princeton, Idaho 83857



LATHROP SMITH
FOREST MANAGEMENT SERVICE CENTER
2150 CENTRE AVE, Bldg A
FORT COLLINS, CO 80526-1891



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