



December 13, 2012

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

Dear Mr. Smith,

This is in regard to the Federal Register Notice Volume 77 "Information Collection; Advertised Timber for Sale"

Sun Mountain Lumber Inc. is very opposed to the proposal to include 16c "Timber Sale Contract Volume Disposition-Nonmanufacturers" on any timber sale bid form.

Paragraph 92.12 of FSH 2409.18 requires the Forest Service to "Use the historic procedure to complete 6-month analysis and as the basis for assigning nonmanufacturer volume for the recomputation procedure." The historic procedure in Region 1 has been to determine, as much as possible, the actual volume of Forest Service timber delivered by nonmanufacturers to large or small manufacturers. In the past, form 2400-46 was used and was required to be submitted by each manufacturer. More recently Contracting Officers have used information from Sale Administrators and manufacturers on the destinations of FS timber. Clearly, Region 1 has a historic practice of using "actual" volume deliveries to determine nonmanufacturer volumes for use in the Small Business Set-Aside Program calculations.

This information is readily available within your accountability system. Load tickets are assigned by sale and are required to be put into lockbox at the receiving manufacturer. These are then collected by the Sale Administrator and entered into your data system. It would take very little effort to include a size class in this entry.

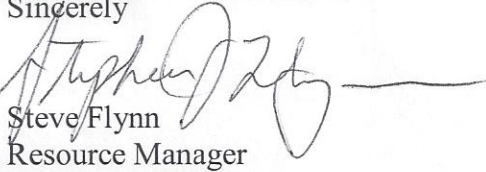
It is critical to both Small and Large business that nonmanufacturer volume be reported accurately, in order for the Set-Aside Program to reflect a correct distribution of delivered volume. This is even more important during this time when the Forest Service is offering such meager timber sale volumes. A mis-reporting of delivered volume can easily cause an error in the triggering, or not triggering, of a Set-Aside Program. And it can also cause significant errors in the five year re-computation.

Sun Mountain Lumber
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It is disturbing to us that the Forest Service, especially at the Washington Office, appears to "have it in for" for the Small Business Set Aside Program. Your reluctance to address issues that are very important to the Small Business Community-such as the inclusion of Stewardship Volume in the Set-Aside Program and appraising Set-Aside Volume to Small Business Manufacturers-along with your willingness to introduce inaccuracies and weaken the Program with proposals such as the one currently under discussion, lead us to conclude that the commitment to the SBA Set-Aside Program is sorely lacking. It is fortunate for Small Business Manufacturers that the Small Business Set-Aside Program is backed by the force of law or, given the Forest Service's apparent attitude; it would have ceased to exist by now.

We strongly urge you to improve upon your historic method of tracking the "actual" delivered volume to manufacturers by size class, by using information existing in your accountability system and to not rely on the inaccurate reporting procedure proposed in this Federal Register Notice.

Sincerely



Steve Flynn
Resource Manager

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