



October 15, 2018

Nicole Budzius
Chief, Retailer Administration Branch
Supplemental Nutrition Assistance Program
Retailer Policy and Management Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 422
Alexandria, VA 22302

**RE: Agency Information Collection Activities: Proposed Collection; Comment Request-
Supplemental Nutrition Assistance Program (SNAP), Store Applications, Forms FNS-252,
FNS-252-E, FNS-252-FE, FNS-252-R, FNS-252-2 and FNS-252-C**

Dear Chief Budzius:

On behalf of Sprint Food Stores, Inc., I want to thank the U.S. Department of Agriculture's Food and Nutrition Service (FNS) for working with convenience store operators and retailers to update the application form used by retailers that wish to participate in the Supplemental Nutrition Assistance Program (SNAP or the Program). We are pleased that FNS is looking to revise the application. Sprint Food Stores, Inc., however, continues to have concerns about the proposed SNAP retailer application and our ability to continue as a SNAP retailer.

Sprint Food Stores, Inc. is a chain of 20 stores located in and around Augusta, Georgia. 18 of our sites participate in the SNAP program. Our locations are located in both Georgia and South Carolina. The locations are in both metro areas as well as rural parts of the states.

Sprint Food Stores sells legal products that people want to buy. In general, convenience stores frequently operate in areas underserved by larger format retailers and during hours of the day in which other stores might not be open. This allows us to serve individuals and families that participate in SNAP at a time and location that is convenient to them. We are committed to the communities in which we operate and are often the only retailer in the community that redeems SNAP benefits. To that end, small format retailers are critical to the success of the Program. As long as a retailer meets the legal requirements for participating in SNAP, FNS should support a retailer's participation in the Program—even if the retailer also sells items that are ineligible for purchase with SNAP benefits.

As we have said previously, our company proudly participates in SNAP. Unfortunately, Sprint Food Stores, Inc. is concerned that the FNS proposed retailer application is written in a way that would make it difficult for us to continue to participate in SNAP.

For instance, Sprint Food Stores, Inc. finds the proposed Question #21, referencing total retail sales, to be confusing. In previous iterations of the application, FNS only requested retailers disclose a percentage of sales that combines all ineligible items. FNS' request for the percentage of sales that are

from gasoline leads us to assume FNS may reject applications from retailers whose total sales of gasoline are above a certain threshold. Furthermore, although we understand FNS must gather information on the percentage of hot foods sold, we sell cold foods – such as sandwiches, salads, fruit– that are eligible for purchase with SNAP and are for home consumption. The FNS regulations do not support the request for this sales information.

Furthermore, Sprint Food Stores, Inc. finds the proposed Question #18, referencing varieties of food, to be misleading. While the law requires that we have seven varieties of each of the four staple food groups in stock, FNS requests that our company indicate the precise variety of items we have in each staple food group or check the box to indicate we have 10 or more varieties of each staple food. As the question is currently written, Sprint Food Stores, Inc. assumes FNS gives preferential treatment to applications that display more than the required number of varieties in each staple food category. While we always meet the statutory requirements, the types and numbers of each item in our stock often changes based on our suppliers, our customers' preferences, etc. It should be sufficient for FNS that we certify that we meet the minimum requirements, as it is with Questions #19 and #20 in the proposed application.

Sprint Food Stores, Inc. wants to reiterate its appreciation of FNS' willingness to work with small format retailers to revise the SNAP retail application. Thank you for your consideration of these concerns, and please let me know if I can provide any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anderson B. Jones', with a stylized flourish at the end.

Anderson B. Jones
President/CEO