



September 28, 2007

Mr. John C. Giler
Acting Director
Field Management Division
Federal Grain Inspection Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear John:

I write to share with you AAGIWA's impressions of the "Grain Car Inspection Pole" device which FGIS has developed to potentially aid in conducting stowage examinations of rail cars.

AAGIWA's Board of Directors met September 10-11 during which time we took the opportunity to look at and experiment with the device. We believe that while device has a number of positive attributes, that ultimately it is so unwieldy as to be unusable. On the positive side, Board members observed that:

1. The device appears well-designed from an engineering perspective.
2. The camera resolution is excellent – the image detail provided is very good.
3. The camera is light weight.

However, despite these positive attributes, the overall concern is that the device is so top heavy as to be very unstable in the best of circumstances and terrain. This instability would appear to make the device not practical for field use. The only approach that would seem workable to us would be if the camera were permanently attached to some platform that rail cars would pass by.

Having said this, we appreciate FGIS' interest in addressing concerns we all share with employee safety surrounding the performance of stowage examinations on rail cars. If some such device as FGIS is experimenting with could be developed that would minimize the need for personnel to be atop rail cars, that would hold the potential for significantly reducing the safety issues attendant to providing stowage examinations.

Grain Car Inspection Pole

September 28, 2007

Page 2

We hope these comments are constructive and would welcome the opportunity to provide input to FGIS on an ongoing basis as it develops equipment ideas and prototypes for use in the inspection process.

Respectfully,

A handwritten signature in black ink that reads "Larry Kitchen". The signature is written in a cursive, flowing style.

Larry Kitchen

President

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