



Mr. David Witherell
Mr. Simon Kineen, Chariman
North Pacific Fisheries Management Council
1007 West Third Street, Suite 400
Anchorage, AK 99501

Re: Eastern Aleutian Islands Golden King Crab Facility Use Cap

Dear Council Members;

I am writing you today to request that that Council tasks Staff to initiate action that would lead to the removal of the Eastern Aleutian Islands Golden King Crab Facility Use Cap. This action has shown to constrain competition for those PQS holders who do not operate a processing facility and must rely on a custom processing arrangement with an eligible processor. I believe the original intent of the cap to encourage processor competition now does the opposite. Up to 25% of the EAG GKC PQS is now held by independent entities whose processing options are limited to processors who may or may not produce the highest valued product form thereby limited marketing options for the independent PQS holder.

Recently Royal Aleutian Seafoods (RAS), who is the sole processor limited by Facility Use Cap, has partnered with Independent IPQ holders in the development of a live crab market program. The success of the program will mean higher market value for the crab creating a higher ex-vessel value and greater value to the State. As the program "scales-up" to demand, the market will be constrained because of the Facility Cap, limiting the amount of crab that can enter the market and inhibiting the PQS holder from extracting maximum value for their crab and the harvesters that they are match-shared with.

UniSea/RAS respectfully request that the action to remove the caps be initiated, which will make the EAG GKC fisher consistent with the regulatory requirements established in the other Crab Program fisheries.

Sincerely,

A handwritten signature in blue ink, appearing to read "T Enlow", is shown within a light blue rectangular box.

Tom Enlow

President and CEO

UniSea, Inc.