

Paul Zullo
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June 22, 2011

Gourmet Boutique, LLC
144-02 158th St.
Jamaica, NY 11434
USDA EST. 18799

Docket Clerk, U.S Department of Agriculture, FSIS
Room 8-163A Mailstop 3782
Patriots Plaza 3
1400 Independence Ave SW
Washington, DC 20250-370

RE: Petition for the Issuance of a Rule Regarding the use of the Term “Grilled” for Poultry Products

I. Background

As manufacturers of grilled chicken, Gourmet Boutique respectfully submits that a true standard for “grilled” be established. A standard does not currently exist but the term has been permitted on products that appear to be “grilled” but are in that sense only, appear to be grilled. Grilling is more than some “lines” placed on a piece of chicken for example. There are more attributes to “grilled” than just a “grill mark”. True grilling is explained below and is far from the economical “informal permitted use” that is put forth directly below. In addition, testimonials from renowned chefs are included.

Current “Informal” Standard

There is not a standard of identity for "grilled." However, we have permitted its use on labeling if it is used in a manner that is not false or misleading. For example, a product cooked on a flat surface such as a griddle using various sources of heat or on a grated surface using open flames traditionally result in grilled products. More recently, industry has modernized traditional cooking procedures, e.g., by utilizing ovens with gas or electric heating coils as the primary source of heat supplemented by steam. We believe that processing in such ovens result in products that can reasonably be characterized as "grilled."

Companies also sometimes add grill marks to cooked product by exposing the cooked product to a heat source such as fine, heated wires. This is acceptable as well. A product name qualifier, e.g., "grill marks added" is only needed if the grill marks are added by an artificial means, e.g., using caramel color instead of a heat source. “

Jeff Canavan LPPD Staff – email response to inquiry on standard for grilling from September 21, 2009

II. Argument

There are many products on the market that claim to be grilled. In fact these food products are not grilled at all but are either colored or essentially branded to mimic grill marks. A grill is the only cooking method that can impart a true grill mark. In addition, the combination of other cooking techniques which are not true “grilling” at all and use moisture or some other means to complete the cooking process is not truly a grilled product. Other cooking methods that introduce moisture or lack of high heat are not conducive to true grilling and will inhibit the Maillard reaction which is the process of sugars and proteins chemically bonding to form the caramelized taste and look of true grilled foods. These foods while at a quick glance appear to be “grilled” are not representative of what the true grilled product tastes like. This is misleading to the consumer in how the product was cooked and the consumer’s expectation of the flavor profile that is created when a product is truly grilled. Grilling is a cooking technique that utilizes dry heat, a bottom heat source and is cooked on the grill. “The real secret to the flavor of grilled food is not the fuel but the drippings. Dribbles of juice laden with natural sugars, proteins, and oils fall onto the hot coals and burst into smoke and flame. By catalyzing myriad chemical reactions, the intense heat forges these charred juices into molecules that convey the aromas of grilling food. These new molecules literally go up in smoke, coating the food with the unmistakable flavor of grilled food.”¹ To exemplify this argument of true grilled meat and poultry products versus, for arguments sake “grill marked”, one can compare the USDA standard for barbecued meats.

The standard of identity for barbecued meats requires that barbecued meats be cooked by the direct action of dry heat resulting from the burning of hard wood or the hot coals there from for a sufficient period to assume the usual characteristics of a barbecued article, which include the formation of a brown crust on the surface and the rendering of surface fat (9 CFR 319.80).

This standard of identity for barbecued meats specifies exactly how the product must be prepared and also includes a description of the defining characteristics of products that meet the standard.

The advent of new ways to create the appearance of a grilled meat or poultry product by means other than described above is false and misleading.

¹ Myhrvold, Nathan, Young, Chris, Bilet, Maxime. Modernist Cuisine, The Art and Science of Cooking. Bellevue: The Cooking Lab, 2011

In addition, grilling has become larger than the backyard event with hot dogs and hamburgers. It is prolific on menus, cook books and televised cooking shows. This cooking method has branched out and the items that are now grilled have grown substantially. The consumer expects the classic characteristics of a product that is cooked over high heat.

- burnt, acrid, acerbic, toast, carbon, fire-cooked, charred protein, flame seared, ashy, charcoal, earthy, hearty, pyrolyzed, smoky, scorched, caramelized, chemical, bitter.

III. Action Requested

For the same reason that standards of identities were created as to not mislead or mischaracterize a meat or poultry product, a standard of identity should be instated.

The USDA Standard of Identity for grilled poultry products should be as follows:

GRILLED POULTRY PRODUCTS

Poultry products that have been exposed on a grill-bar type surface, where heat is applied from below as dry, radiant heat and by combustion of gas or charcoal or the like and is cooked on the grill itself to at least 70 % of final cooking temperature may be labeled as “grilled” e.g. grilled chicken breast. Poultry products that are “grill marked” by heated wires or bars or the like and are subject to being cooked by an additional cooking method must be labeled “grill-style” or “grilled style” or “grill marks added”, “grill branded”, e.g., grilled style chicken or “chicken with grill marks added”. Poultry products to which grilled flavors (natural or artificial) are added must be labeled as such, e.g. “chicken with grill marks and grilled flavors added”.

NOTES Grilling is a cooking technique that involves dry heat from below. Food to be grilled is cooked on an open wire grid with a heat source from below. Heat transfer to the food when using a grill is primarily via thermal radiation.

Direct heat grilling can expose food to temperatures often in excess of 260°C (500°F). Grilled meat acquires a distinctive roast aroma from a chemical process called the Maillard reaction. The Maillard reaction only occurs when foods reach temperatures in excess of 155°C (310°F).

High temperature, low moisture levels, and alkaline conditions all promote the Maillard reaction.^[3] Low moisture levels are mainly necessary because water boils into steam at 212 Fahrenheit (100 Celsius), whereas the Maillard reaction happens noticeably around 310 Fahrenheit (155 Celsius): by the time something is in fact browning, all the water is vaporized.

Note that the browning of food, as when bread is toasted, can only be achieved through dry-heat cooking. This browning in turn leads to the development of complex flavors and aromas that can't be attained through moist-heat cooking techniques.

IV. Supporting Documentation

From: Vanessa Lindsay
Sent: Tuesday, September 22, 2009 2:33 PM
To: Jason Sussman; Robert Liberto; Paul Zullo
Subject: FW: labeling standard of identity [Incident: 090921-000039]
Read from bottom up

Subject

labeling standard of identity

Discussion Thread

Response (Jeff Canavan)

09/21/2009 01:08 PM

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If you would like to create a regulatory standard, you would need to petition to the Agency to conduct rulemaking. Petitions may be mailed to:

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

Auto-Response

09/21/2009 12:14 PM

Your question has been received by the Labeling and Program Delivery Division. The reference number for your question is 090921-000039. You should receive a response from us within 5 business days.

You may update your incident at http://askfsis.custhelp.com/cgi-bin/askfsis.cfm/php/enduser/acct_login.php?p_userid=vlindsay@gourmetboutique.com&p_next_page=myq_upd.php&p_iid=57507&p_created=1253549674

Thank you,
LPDD Staff

Customer (vanessa lindsay)

09/21/2009 12:14 PM

i would like to know how to go about getting a standard of identity created. for example...is there a standard of identity for "grilled chicken". More specifically, is there a standard for using the term "grilled". What exactly does grilled mean? And is there a difference between grilled and grill marked? can someone use the term grilled if the product is merely marked, then cooked in an oven and not really "grilled" at all?

Where There's Smoke, There's Flavor

Two distinct groups swear by charcoal grills: briquette devotees and those who favor hardwood charcoal. Advocates of the pillow-shaped lumps of charcoal cite their ease of use and consistent, steady heat. Grilling purists, on the other hand, point out that honest-to-goodness blackened chunks of hardwood burn hotter, faster, and cleaner. These are all fair points.

Some evangelists for hardwood fuels also claim that charcoal made from hickory, mesquite, or other fragrant-burning woods imparts flavor that is the secret to grilling nirvana. They scoff at briquettes and claim that the only flavor they impart is the taste of lighter fluid. But science tells us that this can be nothing more than zealotry. Once the flames of ignition have died and the coals are glowing hot, neither briquettes nor hardwood charcoals have any flavor left to impart. Any aromatic compounds the fuel once harbored were vaporized and destroyed long before the food was laid on the grill.

The composition of the charcoal does affect its ash content. Briquettes contain more incombustible minerals and thus

leave behind a lot of ash. The blanket of ash insulates the embers somewhat but also diffuses their heat, so they burn cooler but also slow and steady. Hardwood charcoal leaves less ash, so it burns hotter but usually faster and less predictably.

Neither of these effects matters to the flavor, however. Carbon is carbon; as it burns, it imparts no flavor of its own to the food being grilled.

The real secret to the flavor of grilled food is not the fuel but the drippings. Dribbles of juice laden with natural sugars, proteins, and oils fall onto the hot coals and burst into smoke and flame. By catalyzing myriad chemical reactions, the intense heat forges these charred juices into molecules that convey the aromas of grilling food. These new molecules literally go up in smoke, coating the food with the unmistakable flavor of grilled food.

The real debate among the faithful, then, shouldn't be about which charcoal is best. It should be about whether charcoal is necessary at all.



A setup that can quickly raise the grill is the best way to handle flare-ups. Dodging the flames works better than dousing them with a spritz of water from a spray bottle. However, raising the grill doesn't reduce the intensity of the radiant heat. To make an appreciable difference in the intensity of the heat, you must raise the grill surprisingly high above the coals. This is explained in *The Sweet Spot of a Grill*, on page 14.

July 7, 2011

Michael Anthony
Chef
Gramercy Tavern
42 East 20th Street
New York, NY 10003

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

To Whom It May Concern:

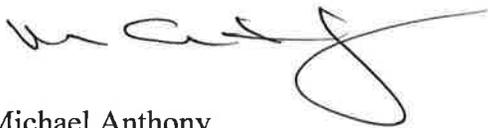
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Based upon my many years of experience in the food industry I agree with their argument regarding grilled food and their proposed change. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Anthony". The signature is fluid and cursive, with a large loop at the end.

Michael Anthony

Chef Michael Anthony

Gramercy Tavern | New York

Biography

Michael Anthony grew up in Cincinnati, Ohio, and graduated from Indiana University with degrees in Business, French, and Japanese. After graduating, he moved to Tokyo to hone his language skills, but ended up developing an interest in the local culinary scene. He worked in a bakery and a farm and eventually a restaurant: *Bistro Shima*, a small French bistro in Tokyo, with chef Shizuyo Shima.

Heeding Shima's advice, Anthony moved to Paris in 1992, enrolled in culinary school at Le Ferrandi, and began a rigorous apprenticeship with Chef Jean Delaveyne at *Le Camélia* in Bougival. By the time he had completed his training, he had a job waiting for him in the kitchen of *Jacques Cagna*. Anthony would later return to Paris to work in the kitchens of both *L'Arpege* and Pascal Barbot's *L'Astrance*.

After his *Jacques Cagna* stint, Anthony left Paris for New York, working first at *Daniel* and then as chef de cuisine at *March*, where he also played an integral role in the restaurant's redesign. After *March*, Anthony returned to Paris for a summer to work for Chef Michel Guérard at *Le Prés d'Eugénie*. Upon returning to New York, he joined the team of *Blue Hill*, first as co-chef of the Manhattan outpost and later as the opening executive chef at *Blue Hill Stone Barns*, located on a farm in upstate New York. There Mike and chef/owner Dan Barber had the opportunity to build a restaurant that embodied the "farm to table" concept, thanks to the abundance of farm-fresh ingredients they had at their disposal.

After four years at *Blue Hill Stone Barns*, Anthony returned to New York in September 2006 as executive chef of *Gramercy Tavern*. From this base, he's an active part of the local community, giving tours to students from nearby elementary schools, trying to start a greenhouse project at Washington Irving High, and arranging visits to local farms for his staff, teaching them first-hand how and where the food they serve each day is grown.

'Nightline' Platelist: Michael Anthony

By SARAH ROSENBERG and JULIA HOPPOCK

March 28, 2008

Unlike many other award-winning chefs, Michael Anthony, the executive chef of New York's Gramercy Tavern, didn't grow up loving food. He developed his appreciation for food when he least expected it: when he was living in Japan.

"If you look in the kitchen, I think that most of that inspiration comes from my early experience working in Japan, where I was enamored with how connected they are to the seasons around them, how focused they stayed from month to month on what grows in each one of their regions, as well as the chefs that I worked for early in France that gave me a sense of technical training," Anthony said.

Anthony left home for Japan the day after he graduated from Indiana University, where he earned degrees in Japanese and business. He ventured to Japan to immerse himself in the country's industry, language and culture.

After a number of odd jobs in Japan, he was hired to work in a restaurant with "an incredibly inspiring chef."

Anthony's love for cooking blossomed while working with that inspiring chef, Shizuyo Shima, at Bistro Shima, a French-Japanese fusion restaurant in Tokyo.

"I found myself in love with the idea of working in this small restaurant with the chef, myself and two servers," Anthony said. "In about a year I learned the foundation of most of the cooking that we [at Gramercy Tavern] practice."

His attempt to learn Japanese and seek out adventure led him into the culinary world. Simply put, he got "hooked."

Following Shima's advice, Anthony moved to Paris, enrolled in culinary school at Le Ferrandi and began a year-long apprenticeship with chef Jean Delaveyne at Le Camelia in the Paris suburb of Bougival.

"It was a great way to get into the business," Anthony

said. "It introduced me to a culinary tradition and a culture that I didn't grow up with."

His Grandparents' Garlic

Anthony grew up in the Midwest in an Italian family that cooked simple, traditional meals.

"We were proud of a lot of grandma's dishes. But that was simple cooking," he said. "These were people that had adopted recipes from their parents and adapted them with ingredients that more or less came from their gardens, simple things, not sophisticated food but great food."

As a child, Anthony helped garden with his grandparents, picking out ingredients for their meals.

"All great ingredients came out of that garden during summertime," Anthony said. "It was my grandfather that happened to be very good at really everything he touched. We ate really simple food: salads and peppers, and they were very proud of their garlic."

That garlic was passed down from Anthony's great grandfather and is still growing today. In fact, Anthony had a grower set aside a plot of land in upstate New York to continue growing this same garlic crop for the restaurant.



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"So in a sense, we're using garlic that hasn't been crossed with any other varieties, that's come straight from the family," he said.

Making a Dish More 'Powerful'

While Anthony admits that he didn't always enjoy helping out in the garden as a child, he believes "there's nothing more luxurious than eating right from nature."

"We didn't look at it like that when we were kids," he said. "That was a heavy task to get out in the summer and help in the garden."

That experience, however, helped form the approach he now uses at Gramercy Tavern of using local seasonal ingredients.

Anthony took over as executive chef there in 2006 and in 2007 was named "best new chef" by Time Out New York.

"It was incredibly inspiring to join a team at Gramercy Tavern," he said. "It's one of the longest standing culinary traditions in the country."

Gramercy Tavern has been one of the nation's most popular restaurants, and the recipient of numerous awards over the past decade. In 2005, Gourmet magazine ranked Gramercy Tavern as one of the top 50 restaurants in the world, and it has consistently been named in Zagat as New York City's most popular restaurant.

Just this past month, both Anthony and Gramercy Tavern were nominated for James Beard Awards, a highly competitive culinary recognition. Anthony was nominated for the "Best Chef: New York City" and Gramercy Tavern for "Outstanding Restaurant." The winners will be announced in June.

Anthony's style at Gramercy Tavern blends the techniques he learned in France and Japan.

He makes a concerted effort to buy locally. Seventy percent of the ingredients used at Gramercy Tavern come from local sources and greenmarkets.

"The restaurant is based on seasonal ingredients and celebrating local producers, mostly because those are flavors that we've fallen in love with and want to reproduce. If we do our jobs well, we don't get in the way of that flavor," Anthony said. "There's a simple gesture of cooking foods -- combining flavors in a way that you would want to lean over to your friend and say 'taste this!'"

Even though he is now a veteran of the food

business, Anthony admits its still "a bit of surprise and awe when you hit a great flavor combination."

While food might not have always been a passion for Anthony, it is now a central part of his life, embodying what he enjoys the most.

"It's adventure; it's excitement; it's our interest in connecting with people. Ultimately, food is a great connector."



ADVERTISEMENT

July 7, 2011

Kerry Heffernan
Executive Chef
South Gate
154 Central Park South
New York, NY 10019

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

To Whom It May Concern:

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Based upon my many years of experience in the food industry I agree with their argument regarding grilled food and their proposed change. Thank you.

Sincerely,



Kerry Heffernan

bio



Executive Chef Kerry Heffernan brings 20 years of culinary excellence, experience and leadership to the kitchen of South Gate (154 Central Park South, 212.484.5120). This welcome addition to the Central Park South dining landscape features the outstanding seasonal American fare for which he has become known.

Born in Pennsylvania and raised in Connecticut, Kerry developed an interest in the culinary arts at a very young age. At 14, he took a job in a local restaurant, laying the foundation for the stellar career that lay ahead. Following high school, Kerry bicycled through Europe for four months, spending a good portion of that time exploring the goût de terroir in the South of France. There, he set up camp – literally, living in a tent – and found a job baking croissants. He returned home to attend the Culinary Institute of America, graduating second in his class.

After spending a year cooking and traveling throughout Europe, Kerry returned to New York City, honing his skills at such highly regarded restaurants as Montrachet, Le Régence, Restaurant Bouley and served as Sous Chef, working with Chef Tom Colicchio at Mondrian before landing his first job as Chef de Cuisine at One Fifth Avenue. Under the direction of Chef Alfred Portale, Kerry designed the restaurant's signature fish menu. Kerry later became the Executive Chef of the Westbury Hotel's famed Polo Restaurant, training ground of such extraordinary talents as Thomas Keller and Daniel Boulud.

In 1998, Kerry became the opening Executive Chef and eventually partner at Union Square Hospitality Group's Eleven Madison Park. While at Eleven Madison, Kerry introduced New Yorkers to his elegant signature seasonal cuisine. Under his leadership, the restaurant received accolades from a wide variety of sources, including a tie with Per Se on Zagat Survey's "Top 20 Most Popular Restaurants in New York," The James Beard Foundation's Award for Outstanding Service in America, Wine Spectator's Award of Excellence and Esquire Magazine's "Best New Restaurant."

Over the course of his career, Kerry has remained active outside the kitchen with numerous volunteer services, such as cooking for Share Our Strength, Project by Project, City Meals on Wheels, Kids for Kids and both the Central Park and Madison Square Park Conservancies.

An avid saltwater fly fisherman and snowboarder, Kerry is thrilled to have found a new home on Central Park South. He will look to the park to serve as both seasonal inspiration and the ideal backdrop for his graceful cuisine.

July 7, 2011

Greg Lauletta
Executive Chef
Prime Restaurant
117 New York Avenue
Huntington, NY 11743

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

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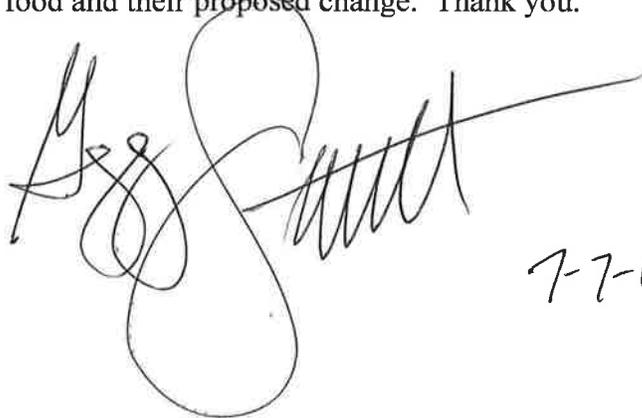
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Based upon my many years of experience in the food industry I agree with their argument regarding grilled food and their proposed change. Thank you.

Sincerely,

Greg Lauletta

A handwritten signature in black ink, appearing to read 'Greg Lauletta', with a long horizontal line extending to the right.

7-7-11

Gregg Lauletta Appointed Executive Chef At Prime - An American Kitchen & Bar

Prime an American Kitchen and Bar(April 4, 2008) - Prime - An American Kitchen and Bar (117 New York Avenue, Huntington, NY [631] 385-1515 or www.restaurantprime.com) announces Gregg Lauletta as its new Executive Chef.

Lauletta, a Long Island native from Floral Park, joined Prime from Shelly Fireman's Fireman Hospitality Group where he was corporate chef. There he oversaw culinary operations for seven diverse Manhattan restaurants including Trattoria dell'Arte. Throughout the group, he oversaw kitchens that ranged from Italian and American seafood to a Tuscan-style steakhouse. As a member of the executive team that built and opened Shelly's La Tradizionale and Brooklyn Diner Times Square, Lauletta created menus for all the group's cuisine concepts.

Lauletta's culinary arts career was forged under the tutelage of Chef Larry Forgione, the 'Godfather' of American cuisine and chef-owner of An American Place and The Beekman 1766 Tavern. In 1994, the fellow Long Islander recruited the then-student of biology to assist in a celebrity-studded Miami culinary fundraiser. Lauletta was smitten. Creating and serving dishes savored by the good and the great and in an exclusive setting fired him up. Opting to exchange life with mortar and pestle in a pharmacy, for one in a fine dining establishment, Lauletta graduated first in his class from The New York Restaurant School at the Art Institute of New York City.

Since his first steps in a professional kitchen, Lauletta has worked alongside noted chefs in top spots. His formative cooking years were spent with Forgione at An American Place and Tom Colicchio at Gramercy Tavern. Honing his skills further, he became tournant to Todd English at Olives Restaurant; chef de p?rtie to Gabriel Kreuther at The Ritz-Carlton's Atelier; and sous chef to Alfred Portale at New York's legendary Gotham Bar & Grill. After a stint as executive chef at Millie's at the Americana Manhasset, Lauletta joined Fireman Hospitality Group.

Now at Prime, working with the Bohlsen family at what the New York Times' Joanne Starkey calls, "a waterfront palace with a menu to match," Lauletta is applying his know-how. His passion for fine dining is paired with dynamic kitchen management skills for assorted menus at the bar, on the deck, in the lounge and in the elegant dining room. He takes pride in cooking but also in teaching. Lauletta espouses the use of all the senses. He believes tasting is important but also is listening to the sound of a searing pan, trusting one's nose and evaluating presentation. He also teaches the importance of seasonality and of supporting local growers from New York's North Fork and Hudson Valley.

At Prime, Lauletta is the noted chef in a top spot. His talented and disciplined hand is integral to the restaurant's presentation of the latest trends in cuisine and design. The most insatiable and fashionable of diners are given a first-choice dining destination whatever their mood. Under one roof, diverse menus combine classic favorites with modern twists. The Prime experience elegantly juxtaposes the best of new and old worlds. Its dining and d?cor is underscored by excellent service and topped off by a spectacular view of Huntington Harbor. Prime is the third fine dining establishment from the Bohlsen family who own and operate the highly distinguished, top Zagat-rated Tellers Chophouse in Islip, NY and Long Island favorite, H2O Seafood Grill in Smithtown, NY.

July 7, 2011

Josh Lawler
The Farm & The Fisherman
1120 Pine Street
New York, NY 19107

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

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Sincerely,

Josh Lawler

A handwritten signature in black ink, appearing to read "JL Lawler", written over the printed name "Josh Lawler".

At 31, **Chef Joshua Lawler** is one of the nation's brightest rising star chefs. Most recently, he served as chef de cuisine at Blue Hill at Stone Barns, the acclaimed Pocantico Hills, New York restaurant owned by James Beard award-winning "Chef of the Year" Dan Barber that *Food & Wine* magazine named among their "10 Life-Changing Restaurants." Chef Lawler developed the restaurant's daily five- and eight-course tasting menus, focusing on local, sustainably raised ingredients, and earned a host of accolades.

During his tenure there, the restaurant was featured in *Esquire*, *Savour*, *O* magazine, *Bon Appetit*, *Time*, *The New York Times* and *The Washington Post*. Chef Lawler's dishes have been highlighted in *Time Out New York's* "100 Best Things We Ate and Drank This Year," as well as a glowing "Four Stars" review from *Bloomberg*. Mother Nature Network named Chef Lawler one of their "40 Chefs Under 40," and Serious Eats named Blue Hill at Stone Barns "The Most Important Restaurant in America" in 2008.

Prior to his extraordinary work at Blue Hill at Stone Barns, Chef Lawler served as opening chef de cuisine at Bill Telepan's eponymous Manhattan restaurant, Telepan, where they earned an enthusiastic "Two Stars" review from *The New York Times*: "[Telepan] shuns trickery and puts its faith in fundamental virtues: its freshness; the pureness or punch of its flavors; the skill with which it's been cooked."

Before his success at Telepan, Chef Lawler was a sous chef at Laurent Tourondel's original BLT Steak, and helped to open BLT Prime. He also spent time learning to source produce and meats from Hudson Valley Farmers alongside his mentor and future employer Bill Telepan. Chef Lawler is a 2001 graduate of Drexel University, where he received a B.S. in Hotel and Restaurant Management. During his years at Drexel, he worked in some of Philadelphia's most prestigious kitchens, including The Fountain at The Four Seasons, Striped Bass and Buddakan.

Chef Lawler began cooking when he was just fourteen, and could frequently be found in the kitchen beside his grandfather, a butcher, or tending to a quarter-acre farm in his backyard.

July 7, 2011

Aki Moroto
Chef
Zuzu Ramen
173 4th Avenue
Brooklyn, NY 11217

Docket Clerk, U.S. Department of Agriculture (USDA), FSIS
Room 2-2127 George Washington Carver Center
5601 Sunnyside Avenue
Beltsville, MD 20705.

To Whom It May Concern:

I have read the petition to establish a standard of identity of grilled food as submitted by Gourmet Boutique and their proposed standard of identity as shown below.

GRILLED POULTRY PRODUCTS

Poultry products that have been exposed on a grill-bar type surface, where heat is applied from below as dry, radiant heat and by combustion of gas or charcoal or the like and is cooked on the grill to at least 70% of final cooking temperature may be labeled as "grilled" e.g. grilled chicken breast. Poultry products that are "grill marked" by heated wires or bars or the like and are subject to being cooked by an additional cooking method must be labeled "grill-style" or "grilled style" or "grill marks added", "grill branded", e.g., grilled style chicken or "chicken with grill marks added". Poultry products to which grilled flavors (natural or artificial) are added must be labeled as such, e.g. "chicken with grill marks and grilled flavors added".

Based upon my many years of experience in the food industry I agree with their argument regarding grilled food and their proposed change. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aki Moroto', with a long horizontal line extending to the right.

Aki Moroto

Aki Moroto

Zuzu Ramen

Profile

ZuZu has brought ramen to Park Slope, which alone is cause for celebration among brownstone-dwelling noodle-heads. But on top of that, classically trained chef Akihiro Moroto, late of Lespinasse and Jean Georges, has taken several liberties with tradition, at the risk of infuriating some devotees and titillating others. Consider us thoroughly titillated, especially by the Thai-inspired green-curry-miso ramen (\$10), a moderately spicy bowl of soup garnished with fragrant sprigs of Thai basil and stocked with the same springy noodles, runny egg, and blowtorched char shu (long strips of braised pork) that populate the classic smoky house “ZuZu” ramen (\$14). Moroto also makes a comforting beef curry, available over rice or noodles, and a version of the increasingly ubiquitous pork buns—his stuffed with sticky, caramelized bits of pork shoulder, thick cucumber slices, and a sweet chile sauce (\$8). There’s Japanese beer and sake, the traditional ramen quaffs, and bar seats that look directly into the glass-walled kitchen. — Rob Patronite and Robin Raisfeld NY Magazine