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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
PROBATION OFFICE

February 28, 1994

Reply to: Kansas City

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Mr. William W. Wilkins, Jr.
Chairman, United States Sentencing Commission
Federal Judiciary Building
One Columbus Circle, N.E.
Suite 2-500, South Lobby
Washington, D. C. 20002-8002

Re: §2D1.1(c) -- Drug Quantity Table

Dear Chairman Wilkins:

Reference is made to Guidelines Manual §2D1.1(c), Drug Quantity Table, and Appendix C, Amendment 487.

The definition of "cocaine base" as defined in §2D1.1(c) seems to be vague and misleading. I would recommend that the explanation about forms of cocaine base other than crack, as clarified in Amendment 487, be included in the definition of crack. In other words, I am suggesting the following statement:

"Cocaine base," for purposes of this guideline, means "Crack." "Crack" is the street name for a form of cocaine base usually prepared by processing cocaine hydrochloride and sodium bicarbonate and usually appearing in a lumpy, rock like form. Forms of cocaine base other than crack (e.g., coca paste, an intermediate step in the processing of coca leaves into cocaine hydrochloride, scientifically is a base form of cocaine, but it is not crack) will be treated as cocaine."

I believe that including the clarifying statement about cocaine base with the definition of crack will help alleviate confusion.

Respectfully,


Christopher R. Buckman
U. S. Probation Officer

CRB:br

cc: Probation Officer's Advisory Group
426 U. S. Courthouse
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Attention: Mr. Jay F. Meyer
U. S. Probation Officer