



NATIONAL CATTLEMEN'S BEEF ASSOCIATION

1301 Pennsylvania Ave., NW, Suite #300 • Washington, DC 20004 • 202-347-0228 • Fax 202-638-0607

July 8, 2010

Mr. J. Dudley Butler
Administrator
USDA Grain Inspection, Packers and Stockyards Administration
Stop 3601, Room 2055 – South Building
1400 Independence Ave, SW
Washington, DC 20250-3601

Dear Mr. Butler:

The National Cattlemen's Beef Association (NCBA) requests that the comment period on the proposed rule titled "Implementation of Regulations Required Under Title XI of the Food, Conservation and Energy Act of 2008; Conduct in Violation of the Act" be extended 120 days for a total comment period of 180 days. The Secretary of Agriculture referred to this as one of the most sweeping reforms of the Packers and Stockyards Act. As such, it is extremely important that we thoroughly understand the rule and both its intended, and unintended, consequences on the U.S. cattle community.

In looking at the 2008 Farm Bill, we believe that Congress' intent was very clear on the language that prompted this rule. After our initial reading, however, we believe that this rule goes beyond the scope intended by Congress, with results that could have a huge impact on the marketing of cattle in the United States. American cattle producers are innovators and have worked hard over the past several years to develop alternative marketing arrangements and marketing alliances to get paid for the value they add to their cattle. Whether intended or not, we believe that this rule jeopardizes these long-standing marketing arrangements that compensate producers for providing higher quality cattle. Therefore, we need additional time to adequately perform a full legal and economic analysis on the impacts of this rule.

To complete these tasks and make sure that all producers are treated fairly, we ask that you grant a 120 day extension to the comment period. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Foglesong", with a long horizontal flourish extending to the right.

Steve Foglesong
President

AMERICA'S CATTLE INDUSTRY

Denver

Washington D.C.

Chicago