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September 16, 2013

Mr. Stan Harkey,
Product Analysis & Accounting Division
U.S. Department of Agriculture Risk Management Agency
Beacon Facility-Mail Stop 0811
P.O. Box 419205
Kansas City, MO 64141-6205

Re: Federal Register, Vol. 78, No. 158 Docket ID No. RMA-2013-0001

Dear Mr. Harkey:

Regarding the proposed Cost of Delivery study published in the Federal Register, National Crop Insurance Services ("NCIS") has submitted comments. Producers Agriculture Insurance Company ("ProAg") agrees with the positions communicated by NCIS in its comments and adopts those as if submitted by ProAg. ProAg appreciates efforts to analyze and assess the economics of private delivery of federally reinsured crop insure, and we are hopeful that the issues addressed in NCIS will be given due consideration so as to improve the proposed study.

ProAg appreciates the opportunity to communicate its views with respect to the proposed Cost of Delivery study. Please feel free to contact, at the address listed above, Mike Connealy, Kendall Jones, or me with any questions or comments regarding ProAg's views.

Sincerely,

Russell Klein
Chief Financial Officer

www.ProAg.com

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OF AGRICULTURAL RISK MANAGEMENTSM**

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