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**Donald Preusser** 

President

19 September 2011

Ms. Julie Hetrick United States Department of Agriculture Office of Budget and Program Analysis, USDA Jamie L. Whitten Building, Room 101-A 1400 Independence Avenue, SW Washington, D.C. 20250

Re: Farm and Foreign Agricultural Services Request for Information

Ms. Hetrick:

This letter is in regard to the Farm and Foreign Agricultural Services ("FFAS" request for information as published in the Federal Register, Vol. 76, No. 138, dated July 19, 2011. John Deere Insurance Company ("JDIC"), an Approved Insurance Provider under the Federal Crop Insurance Program ("Program"), and a subsidiary of John Deere Financial Services, Inc., respectfully submits the comments contained in this letter.

As JDIC mentioned in its previous letter in response to the FFAS' request for information published in the Federal Register, Vol. 76, dated April 20, 2011, JDIC supports efforts to consolidate information required to participate in Farm Service Agency programs and the Program administered by the Risk Management Agency. JDIC reiterates that consideration should be given to the special role Approved Insurance Providers and other participants in the Program (i.e., agents and adjusters) play, particularly with respect to assisting producers with appropriate risk mitigation strategies.

With respect to the request for comments for ACRSI and overall goals to reduce duplication of information collection, JDIC appreciates the opportunity to submit comments about this project.

This is an expansive project with many intricate and highly technical components. Given the scope including the unique and fluid nature of the USDA programs, JDIC is carefully reviewing all elements of electronic data capture and reporting to ensure a comprehensive set of recommendations are provided. While we understand the necessity for a limited response time to the present RFI, JDIC has not yet completed its research and analysis. Our intent is to complete our internal work and share our recommendations with FFAS within the next 60 days.

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We appreciate your understanding and believe the FFAS will find JDIC's submission helpful to FFAS' stated goals, in particular, providing producers with the option to leverage existing GIS technology to create more accurate and efficient reporting of planting and production information for various USDA supported programs.

Sincerely,

Don Preusser

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