



## National Milk Producers Federation

2101 Wilson Blvd., Suite 400, Arlington, VA 22201  
703.243.6111 • [www.nmpf.org](http://www.nmpf.org)

*"Connecting Cows, Cooperatives, Capitol Hill, and Consumers"*

July 15, 2011

Agri-Mark, Inc.  
Arkansas Dairy  
Cooperative Association  
Associated Milk  
Producers Inc.  
Continental Dairy  
Products, Inc.  
Cooperative Milk  
Producers Association  
Dairy Farmers of  
America, Inc.  
Dairylea Cooperative Inc.  
Dairymen's Marketing  
Cooperative, Inc.  
Ellsworth Cooperative  
Creamery  
Farmers Cooperative  
Creamery  
First District  
Association  
Foremost Farms USA  
Just Jersey  
Cooperative, Inc.  
Land O'Lakes, Inc.  
Lone Star Milk Producers  
Manitowoc Milk  
Producers Cooperative  
Maryland & Virginia Milk  
Producers Cooperative  
Association  
Michigan Milk  
Producers Association  
Mid-West Dairymen's  
Company  
Northwest Dairy  
Association  
Prairie Farms  
Dairy, Inc.  
Premier Milk Inc.  
St. Albans Cooperative  
Creamery, Inc.  
Scioto County Cooperative  
Milk Producers' Association  
Select Milk Producers  
Southeast Milk, Inc.  
Swiss Valley Farms  
Company  
Tillamook County  
Creamery Association  
United Dairymen of Arizona  
Upstate Niagara  
Cooperative, Inc.  
Zia Milk Producers, Inc.

Joe Gaynor, Chief  
Market Information Branch  
USDA/AMS/Dairy Programs  
STOP-0232  
1400 Independence Ave., S.W.  
Washington, DC 20250-0232

***RE: Proposed rule on Dairy Product Mandatory Reporting; Dockets AMS-DA-10-0089, AMS-DA-11-01; 76 FR 34004***

Dear Joe,

The National Milk Producers Federation (NMPF) represents 60% of the nation's 55,000 commercial dairy farmers through their membership in NMPF's 31 constituent dairy farmer cooperative associations. We are the national voice of America's dairy farmers and pursue action that advances their well-being and the success of the cooperatives they own, including the operators of many of the manufacturing plants that are now responsible for reporting to USDA under the present and proposed mandatory reporting program.

As a supporter of the Mandatory Price Reporting Act of 2010, NMPF appreciates AMS' timely progress toward implementing the Act by the statutory deadline of September 27, 2011, and supports the proposed rule, as published. (76 FR 34004) The program you have proposed will provide for newly invigorated and accelerated electronic dairy product price reporting of the benchmark dairy product prices.

NMPF has long advocated the transfer of the dairy product prices program from the National Agricultural Statistics Service to the Agricultural Marketing Service. This will improve reporting and verification by putting both into the same hands: with greater familiarity of the dairy manufacturers' operations, processes, and people, AMS staff will be more effective at both collection and audit.

Establishing a standard electronic reporting format will facilitate AMS' data collection and tabulation. Moving the reporting deadline to Tuesday at noon, and moving the publication time to Wednesday at 3:00 p.m. will give this key data to the

**Jerry Kozak, President/Chief Executive Officer**

**Randy Mooney, Chairman**

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industry two days earlier. Perhaps more crucially, this will allow Federal order prices to incorporate one more current week of prices in 2 months out of every 7 months (or 3 to 4 months of each year) and one less week of older prices in the following month, just as frequently.

We appreciate that the first order of business for this docket is to make a clean transition from joint NASS/AMS program responsibility to sole ownership by AMS, and that only closing this docket will complete that process. We further appreciate that the statutory deadline leaves little time to fully revise all of the program's detailed specifications. So, although we have some concerns about particular program specifications, we understand that these could be more effectively handled in a subsequent docket under the sole direction of AMS.

**Therefore, we offer our full support for the rule, as proposed. We ask AMS to complete the rule and put into effect as quickly as practicable. However, we also urge AMS to initiate a new docket on other elements of the program, including product specifications, so that they may also be addressed as soon as practicable.**

If you have any questions about these comments, or seek additional input, please contact me at your convenience.

Sincerely,



Roger Cryan,  
Vice President  
Milk Marketing & Economics