



Dairy Farmers of America

**Corporate Headquarters**

*Northpointe Tower*  
*10220 N. Ambassador Dr.*  
*Kansas City, MO 64153*

Phone: 816-801-6422

Fax: 816-801-6423

E-mail: [ehollon@dfamilk.com](mailto:ehollon@dfamilk.com)

**FAX COVER SHEET**

DATE: 7/28/11

TO: John R. Mengel 202-720-2454

FROM: Elvin Hollon

RE: Proposed Rule on Dairy Product Mandatory Reporting

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This FAX message has 2 pages, including this cover sheet. If you have any questions or if all pages are not received, call the person who sent you this FAX from DFA at the number listed above.

**COMMENTS:**



Dairy Farmers of America

John R. Mengel, Chief Economist  
USDA/AMS/Dairy Programs  
STOP 0229 - Room 2753  
1400 Independence Ave, SW.,  
Washington, DC 20250-0229

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

Dear John:

Dairy Farmers of America, Inc. (DFA) has been a strong advocate of allowing the weekly dairy product price information to move back under the Agriculture Marketing Service's (AMS) operations where data collection, verification and publication can be housed within the same Agency. We feel this will allow the best combination of data collection and oversight.

We have also been a strong advocate of moving the process to electronic data collection as we expect data can be made available to the industry through that vehicle on a timelier basis. This will improve the transition of price information from dairy markets to dairy farmers, milk processors and the entire dairy marketing chain sooner and reduce some of the effects that lagged price information currently has on our industry.

We understand that in order to meet the statutory deadlines imposed by the Mandatory Reporting Act of 2010, there must be a transition of the reporting process from the National Agricultural Statistics Service to AMS. The actions called for under this docket cause that change, and we support them being made promptly. However, we also understand that the time limits established by the Act do not allow for additional input and review by the industry and notification to AMS of suggested changes to program details. Clearly this subsequent review can best be made under the singular jurisdiction of AMS. So, as soon as is practical we request AMS initiate a second Rule and Comment docket so that the industry can provide more detailed input on issues that may affect the product prices data collection and publication.

Sincerely,

Elvin Hollon  
Director of Fluid Marketing and Economic Analysis