

August 24, 2012

Peter W. Burr
Branch Chief, Export Sales Reporting Branch
Import Policies and Export Reporting Division
Office of Trade Programs
Foreign Agricultural Service
1400 Independence Avenue, S.W.
Washington, D.C. 20250-1021

RE: Export Sales Reporting Requirements

Dear Sir or Madam:

National Corn Growers Association (NCGA) appreciates the opportunity to respond to the Federal Register (FR) notice soliciting comment on the proposed rule to add reporting for pork (fresh, chilled and frozen box/primal cuts) and distillers dried grain (DDG) to the Export Sales Reporting Requirements. Founded in 1957, NCGA represents approximately 36,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA and its 48 affiliated state associations and checkoff organizations work together to help protect and advance corn growers' interests.

Growth of the dry grind ethanol industry has resulted in larger supplies of DDGs. Each bushel of processed corn produces 2.8 gallons of ethanol and 17 pounds of DDGs. Through this process, an additional 38.6 million metric tons of high quality distillers grains enter the livestock feed supply from the production of 14 billion gallons of ethanol. The combination of new technology and improved quality control procedures are creating high-quality and nutritional DDGs.

The relationship between corn growers and livestock producers has grown with the increase in distillers grains for livestock feed. According to the Renewable Fuels Association, the amount of distillers grains produced by the ethanol industry in 2009/2010 was more than the total amount of grain consumed by all the beef cattle in this nation's feedlots. Increasingly, important export markets for U.S. corn are interested in the availability of DDGs.

NCGA supports the addition of reporting of DDGs to the export sales reporting requirements. We believe it would facilitate market transparency and allow our industry and our corn marketing partners with the ability to conduct accurate and timely analysis of U.S. market conditions.

Sincerely,

A handwritten signature in cursive script, reading "Garry Niemeyer".

Garry Niemeyer
President, NCGA