



David Hancock, NASS
Clearance Officer, U.S. Department of Agriculture
Room 5336 South Building
1400 Independence Avenue SW
Washington, DC 20250-2024

Subject: Cotton Ginning Survey – Docket Number 0535-0220

Dear Mr. Hancock:

The National Cotton Council, the American Cotton Producers and the National Cotton Ginners' Association fully supports the Cotton Ginning Survey and USDA's intent to revise and extend the collection of the data found therein for a period of three years.

The Cotton Ginning Survey provides important cotton ginning statistics and serves as an aid in forecasting cotton production. In addition, the report provides the industry with an indication of the pace of the cotton harvest. The data collected, consisting of bales ginned, lint cotton pounds produced, number of gins by state and county, and other data, is important not only to the ginners, but to the other industry segments as well. With the recent inclusion of the marketing year average cottonseed price as one of the key components in the price and revenue calculations for the Seed Cotton ARC/PLC programs, it is imperative that all gins report cottonseed prices, and the reported price reflect only the value of the cottonseed to the producer.

The industry supports changes that will enhance the Cotton Ginning Survey and allow for better coordination of this data with NASS production reports. We would suggest that the use of 'asterisks' early in the season, or when insufficient number of gins are reporting, be eliminated. The industry is aware of gins that are operating in these states or counties, so to not show their ginning data is a hindrance in creating necessary industry reports. We suggest that NASS report this data or, if necessary, develop a waiver that would allow all data to be reported. The ginning industry has had great success in survey participation using electronic reporting and suggests that this be made an option for gins.

In summary, we commend NASS for providing the Cotton Ginning Survey and look forward to future reports. Thank you for the opportunity to comment on this important matter and the industry stands ready to partner with NASS to continue to improve the response rate and accuracy of this report.

Sincerely,

National Cotton Council
National Cotton Ginners Association
American Cotton Producers