



Minnesota State Cattlemen's Association

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July 21, 2010

Mr. J. Dudley Butler, Administrator
USDA Grain Inspection, Packers and Stockyards Administration
Stop 3601, Room 2055 – South Building
1400 Independence Ave, SW
Washington, DC 20250-3601

Dear Mr. Butler:

Re: Grain Inspection, Packers & Stockyards Administration Proposed Rule on Implementation of Regulations Required Under Title XI of the Food, Conservation and Energy Act of 2008, Conduct in Violation of the Act – Federal Register Volume 75 No. 119 pages 35338–35354 Dated June 22, 2010

The Minnesota State Cattlemen's Association (MSCA) respectfully requests the comment period on the proposed rule titled "Implementation of Regulations Required Under Title XI of the Food, Conservation and Energy Act of 2008; Conduct in Violation of the Act" be extended through December 21, 2010 to allow for a total comment period of 180 days.

Secretary of Agriculture Vilsack describes the proposed changes as one of the most sweeping reforms of the Packers and Stockyards Act ever. We agree with the Secretary and without careful analysis the magnitude of proposed changes have a high probability of creating many untended consequences that could greatly harm Minnesota's livestock industry and in particular our beef industry.

Livestock production is a complex business that depends on an open and free market in which livestock producers are afforded a wide variety of choices with respect to marketing their products. The complexity of our marketing system dictates a thoughtful and detailed analysis of the economic impact of the proposed rule.

That critical undertaking can not be properly completed in the brief comment period the rule currently affords. Thus on behalf of Minnesota's beef producers MSCA strongly urges the Grain Inspection, Packers & Stockyards Administration to extend the comment period to a full 180 days that would end on December 21, 2010.

MSCA looks forward to working with the Administration in continuing to improve our industry's ability to market the safest, healthiest and most nutritious beef products in the world.

Sincerely Yours,

Ted Reichmann, MSCA President

Copy to: Minnesota's Federal Legislators