

July 19, 2010

J. Dudley Butler
Administrator
U.S. Department of Agriculture
Grain Inspection, Packers and Stockyards Administration
Stop 3601, Room 2055 – South Building
1400 Independence Ave, SW
Washington, DC 20250-3601

Sent Via E-mail and Facsimile: comments.gipsa@usda.gov; 202-690-2173

Re: Joint Request Urging No Extension of Public Comment Period in GIPSA Rulemaking

Dear Administrator Butler:

We, the 56 undersigned organizations, request that the U.S. Department of Agriculture, Grain Inspection, Packers and Stockyards Administration (GIPSA), deny any requests for an extension of time beyond the original 60-day public comment period established in the proposed rule, *“Implementation of Regulations Required Under Title XI of the Food, Conservation and Energy Act of 2008; Conduct in Violation of the Act”* (Proposed Rule) that was published 75 Fed. Reg., 35338-354 (June 22, 2010).

It is our understanding that you have received requests from the National Cattlemen’s Beef Association (NCBA), the American Meat Institute (AMI) and the National Pork Producers Council for a 120-day extension of the public comment period scheduled to close August 23, 2010. If granted, such an extension of the public comment period would unduly delay implementation of the specific reforms mandated by Congress in the 2008 Farm Bill. In addition, any delay would facilitate the continuation of inappropriate market behavior by dominant market participants in the cattle, swine, sheep and poultry industries. It is our strong conviction that GIPSA must continue to work expeditiously, and without delay, to timely promulgate a final rule after the August 23 public comment deadline for the Proposed Rule. This, we believe, is critical so that we can begin the process of returning to independent livestock and poultry producers a properly functioning, competitive marketplace.

We firmly believe the 60-day public comment period established in the 17-page Proposed Rule provides ample time to fully assess and evaluate the succinct provisions contained therein. We further believe the provisions contained in the Proposed Rule are tremendously important to the goal of reestablishing equity between disaggregated U.S. livestock and poultry producers and the highly concentrated meatpacking industries.

The Honorable J. Dudley Butler

July 19, 2010

Page 2

For the foregoing reasons, we respectfully request that GIPSA hold firm its original 60-day public comment period for the Proposed Rule.

Sincerely,

Alaska Farmers Union
American Agriculture Movement
American Grassfed Association
BueLingo Beef Cattle Society
California Farmers Union
Campaign for Contract Agriculture Reform
Campaign for Family Farms and the Environment
Cattle Producers of Washington
Center for Rural Affairs
Citizens for Private Property Rights
Colorado Independent CattleGrowers Association
Contract Poultry Growers Association of the Virginias
Dakota Resource Council
Dakota Rural Action
Family Farm Defenders
Farm & Ranch Freedom Alliance
Farm Aid
Food & Water Watch
Food First
Freedom21, Inc.
Independent Beef Association of North Dakota (I-BAND)
Independent Cattlemen of Nebraska
Independent Cattlemen of Wyoming
International Texas Longhorn Assn
Intertribal Agricultural Council
Iowa Citizens for Community Improvement
Iowa Citizens For Community Improvement
Iowa Farmers Union
JOLT, CRI
Justice from Farm to Plate
Kansas Cattlemen's Association
Land Stewardship Project
Mississippi Livestock Markets Association
Missouri Farmers Union
Missouri Rural Crisis Center
National Association of Farm Animal Welfare
National Farmers Organization
National Sustainable Agriculture Coalition
Nebraska Farmers Union

The Honorable J. Dudley Butler

July 19, 2010

Page 3

Nevada Live Stock Association

Oregon Livestock Producers Association

Oregon Rural Action

Organization for Competitive Markets (OCM)

Peach Bottom Concerned Citizens Group

Pennsylvania Farmers Union

Pennsylvania Independent Farmers and Consumers Association Inc. (PICFA Inc.)

Powder River Basin Resource Council

R-CALF USA

Rural Advancement Foundation International - USA

Slow Food USA

SmallHolders of Massachusetts

South Dakota Livestock Markets Assoc.

South Dakota Stockgrowers Association

Sovereignty International, Inc.

Texas Longhorn Marketing Alliance

Western Organization of Resource Councils

Cc: The Honorable Collin Peterson

The Honorable Edward Avalos

The Honorable John Ferrell