

Congress of the United States

Washington, DC 20515

October 1, 2010

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Secretary Vilsack,

We are writing to express our concerns regarding the economic analysis for the proposed rule, published in the *Federal Register* by the Grain Inspection, Packers and Stockyards Administration (GIPSA) on June 22, 2010, on the marketing of livestock and poultry under the Packers and Stockyards Act.

In the 2008 Farm Bill, Congress directed the Department to promulgate a discrete set of regulations under the Packers and Stockyards Act. However, in doing so, GIPSA also included additional proposed regulations that greatly exceed the mandate of the Farm Bill. Such a broad rule that extends so far beyond Congress' direction in the Farm Bill and that would precipitate major changes in livestock and poultry marketing requires a vigorous economic analysis. The analysis contained in the proposed rule fails to demonstrate the need for the rule, assess the impact of its implementation on the marketplace, or establish how the implementation of the rule would address the demonstrated need.

This proposed rule is sweeping in its scope and would have major consequences in the marketing of livestock and poultry for producers and processors of all sizes. In order for Congress and the public to evaluate this rule and its implications with full transparency, a thorough economic analysis is necessary. Our constituents need this analysis in order to participate in the rulemaking process in a meaningful way. We are asking USDA's Office of the Chief Economist to provide such an analysis, specifically addressing the above concerns.

Your prompt response to this request will be appreciated.

Sincerely,


Collin C. Peterson


Frank D. Lucas


David Scott


Randy Neugebauer

Mark Inglis

Paul Simpson

Pat Trill

Bob

Hyman Jenkins

Fawn P. Hill

Gregg Harper

Henry Auller

John H. Case

John R. ...

Phil Kane

John Hummel

Michael T. McCall

Wally Harger

Ron Paul

Carlson

R. Brown

John T. ...

John ...

Jean Schmidt

Dwight P. Roe

Thomas ...

Scott Murphy

Ammon

Ed A. Lutz

Amos

Brett Guthrie

Larry Kissell

Pete Olson

Boehly

Sam Farr

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Allen Boyd

Arthur P. Carg

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Adrian Smith

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Louis Lehman

Brad Ellsworth

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Bill Owens

Max Baucus

Kevin McCarty

Alan Thulby

Armando Bump

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Sam Cole

Shirley Blum

John Hoekstra

Al SX

Paul Rys

John Tut

Hanny Teague

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