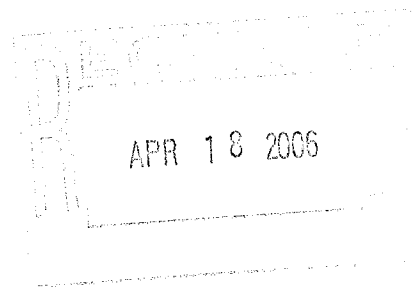


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Whitney A. Rick, Chief
Promotion and Research Branch
USDA/AMS/Dairy Programs
Stop 0233 Room 2958-S
1400 Independence Avenue, SW
Washington, D.C. 20250-0233



RE: Docket No. DA-06-04
Federal Register Page (Feb. 28,2006, page 9978)

Dear Whitney,

Please allow me to preface this communication with the disclaimer that I have been fortunate to have served the dairy producers of Wisconsin for two (three- year) terms as an appointed director on the National Dairy Board which made me a member of DMI. My appointments were made by two different administrations - President Clinton and President G.W. Bush. It was a commitment to Wisconsin dairy producers that I always did with them as my "whispered voice". I firmly believe in the Act and Order that state our check-off investment is for the promotion of, education about and research for dairy in order to benefit the producer and the industry.

With that said I wish to convey some of my concerns after having served for those six years and been intimately acquainted with the operations of the partnership of NDB/UDIA and the formation of DMI.. First of all there is an inequity of funding between the NDB and the UDIA. All funds reside with the NDB and UDIA is supposed to provide funding or "in-kind" contribution to match. The formula is complicated and difficult to equalize when the states/regions have existing programs valuable to them and there are duplication of some programs for which they do not receive credits. Another complication is the non-participation of California which is not always compatible with DMI and the limited participation of Wisconsin in DMI programming. Both of these states have effective programming which is beneficial to the industry and operate their programs efficiently and effectively.

The NDB has two term limits on service while the UDIA side of DMI has no limits on terms. As a result of that many of the directors on the UDIA side are "entrenched" while the NDB members revolve often without a second term and the organization suffers by losing the experience they have gained. An adjunct to that is often when NDB directors finish their allotted terms they switch to the UDIA side with a different emphasis on their goals. Or when UDIA directors are not re-elected they are nominated to sit on NDB. This year NDB lost some very effective directors who were eligible for second terms. Additionally, NDB directors receive per diem only when they are fortunate enough for their nominating organization to provide it. Some NDB members receive no compensation for leaving their operations to serve on the board. There should be a NDB per diem equal to that which the UDIA members are receiving.

My nomination by the Wisconsin Milk Marketing Board was supported by multiple cooperatives and agriculture groups and my background was in promotion and related areas of the checkoff. That is not the case when the political pressure applied by one very large cooperative nominates NDB directors who not only sit on their boards but have absolutely no relative experience in their dairy community with promotion and all it entails. They are there only to promote the issues that their nominating organization perceives are important. No member of NDB should be appointed unless they have local or specific promotion experience regardless of the pressure that can be exerted. The incestuous relationship between officers of a cooperative who serve on the NDB and are also officers in NMPF creates, without a doubt, a conflict of interest. On more than one occasion members of that cooperative said they were told how to handle or vote on an issue that came before the NDB/UDIA/DMI board. Promotion of United States dairy should be the priority and not the goals of any other organization.

I have no problem with appointment of NDB members by the U.S. Secretary of Agriculture but I do have strenuous objections to block voting by cooperatives. Voting on an issue of importance that impacts each producer should be voted on by each producer individually and that voting should occur every three years. That is the only way possible for USDA to judge the perceived effectiveness of the program to the producer.

I believe in the partnering of NDB/UDIA/DMI programs with domestic opportunities to elevate consumer awareness, education and consumption. Also school programming, nutrition programming with professionals and the utilization of the Research Centers to develop new and innovative products that will move the dairy marketplace. I have issues with partnerships that use domestic dairy checkoff funds for foreign investment in any area. Producers are not comfortable with that expenditure. The partnering occurring in the area of Crisis Management is particularly good.

Finally, after serving on the Wisconsin Milk Marketing Board and evaluating their programs and efficiencies, their staffing and producer communication it seems to me that there is a dichotomy between the staffing at DMI and the amount of outside consulting they deem necessary. That is a issue that should be resolved. Much of the funding of NDB could better be directed into the development and implementation of programming.

I apologize for the length of this letter and the enumeration of issues. But, even with all the issues there is no doubt in my mind of the value of the checkoff. It just needs to be re-evaluated, adjusted and streamlined for the producers to feel it is valuable and equitable to all producers across the country and not just those who can wield perceived political clout.

Thank you for calling for comments. I appreciate your consideration of my opinions.

Regards,

A handwritten signature in black ink, appearing to read "Patricia M. Boettcher". The signature is written in a cursive, flowing style with a large initial "P".

Patricia M. Boettcher