

National Family Farm Coalition

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May 1, 2006

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

By Fax to: 202-720-0285

Dear Ms. Rick,

These comments are submitted on behalf of the Dairy Subcommittee of the National Family Farm Coalition (NFFC). We are responding to: Title: **National Dairy Promotion and Research Program; Section 610 Review**; Federal Register Number: 06-01854; Vol. 71, No. 39; Date Published: 02/28/2006 with a comment deadline of 5/01/2006.

It is the position of the Dairy Subcommittee of the National Family Farm Coalition that the National Dairy Promotion and Research Program, funded by a mandatory assessment of 15 cents per hundredweight on all milk produced in the 48 contiguous states and marketed commercially, be rescinded. Our dairy family farmers ask that you reconsider the need and purpose for the Order as originally intended 22 years ago on May 1, 1984, when the program became effective.

This program has been touted as a promotion program geared towards increasing consumption of milk products. It is based on the assumption that we have an excess supply of milk products and therefore farmers should be taxed/assessed to promote increased consumption. In fact, for the past ten years, we have become a net importer of dairy products and those products that are being imported are displacing domestic consumption. We are seeing the lowest dairy prices in real terms in decades, and then farmers are being asked to contribute a sizable amount of their milk check to the promotion program.

The mandatory checkoff was imposed without a producer vote and is not subject to a periodic review referendum by those who fund it. The checkoff program allows dairy cooperatives to "bloc vote" for their members. We specifically request the following:

- 1) **One-farmer/one-vote referendum on a regular basis.** Dairy farmers should have the opportunity, every three years, for a one farmer/one-vote national

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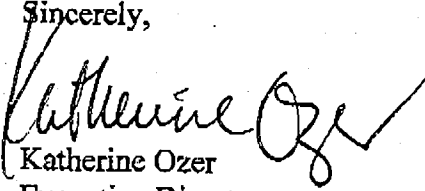
referendum on continuing dairy promotion. U.S. dairy farmers are currently paying \$260 million annually in dairy promotion programs and they've never had a democratic voice in the process. We support a voluntary program and one that is run democratically both at the board and election process.

- 2) **Farmers directly elect National Dairy Board Directors.** The current 36 members of the National Dairy Board are nominated by various cooperatives and farm groups, and then must be approved by the White House. If there is to be a promotion board supported by a checkoff, then dairy farmers should individually vote for NDB directors in their states/regions.

We appreciate the opportunity to submit these comments on behalf of dairy farm families who are striving to earn a living from their dairy farming operations. We request that USDA extend the timeframe for receipt of these comments as we found out late today that the online submission process was not working for these comments. We would urge a re-noticing of the request for public input and an additional 15 days for public input.

Thank you for considering these comments.

Sincerely,



Katherine Ozer
Executive Director

The National Family Farm Coalition (NFFC), founded in 1986, provides a voice for grassroots groups on farm, food, trade and rural economic issues to ensure fair prices for family farmers, safe and healthy food, and vibrant, environmentally sound rural communities here and around the world. NFFC represents family farm and rural groups in 30 states whose members' face the challenge of the deepening economic recession in rural communities caused primarily by low farm prices and the increasing corporate control of agriculture. For further information about the organization, call 1-800-639-3276 or visit www.nffc.net.