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July 28, 2006

Mr. Martin E. O'Connor
Chief, Standardization Branch
Livestock & Seed Program, AMS, USDA
Room 2607-S
1400 Independence Avenue S.W.
Washington, DC 20250

RE: Docket No. LS-05-09 US Standard for Livestock and Meat Marketing Claim,
Grass (Forage) Fed Claim

Dear Mr. O'Connor,

As more and more production claims are made about livestock, it's important to keep them as clear as possible. We believe that the Grass Fed definition of 99% grasses, forbs, etc..... is acceptable. However, we do not feel the definition should allow the feeding of grain silage.

We also believe that Grass Fed is synonymous with Free Range. "Grass Fed" cattle should be pasture-raised while having free access to either natural or manmade shelter during inclement winter weather. Also, from our experience, consumers tend to relate Grass Fed with Free Range. It is likely to cause confusion to try to separate these claims from one another. We recommend that the Grass Fed definition should include language that cattle have not been confined.

If the Grass Fed definition includes the above points, we feel it would communicate a clear message to consumers. Thus, it would not be necessary to include the definition of Grass Fed or Free Range on a retail label. The claim itself could stand alone.

Thank you your time and consideration,

Stephanie Schara

Stephanie Schara
Marketing & Regulatory Compliance

Roy R. Moore Jr.

Roy Moore
CEO & Founder

