



June 12, 2017

M. Irene Omade
Grain Inspection, Packers and Stockyards Administration
U.S. Department of Agriculture
1400 Independence Avenue SW.
Room 2542A-S,
Washington, DC 20250-3613

Dear M. Irene Omade,

On behalf of the United States Cattlemen's Association (USCA) and our nationwide membership of cow-calf operators, backgrounders and feedlot operators, we'd like to express our appreciation of the opportunity to comment on the Farmer Fair Practices Rules.

The USCA strongly supports the allowance of the Interim Final Rule to become effective immediately (Option (1)). The USCA and its members have continued to communicate their overwhelming support of the GIPSA Final Rule and urge the advancement of the implementation of the Farmer Fair Practices Rules. This amendment to the Stockyards & Packers Act would establish needed clarity and prohibit the engagement in the use of any unfair, unjustly discriminatory, deceptive practice, or give any undue or unreasonable preference or advantage to any particular person or locality in any regard.

USCA heavily supports the interim final rule that clarifies what conduct or action may violate Sections 202(a) and (b) of the P&S Act without the requirement to reveal the harmful effect on competition. These rules are practical and we hope they will be embraced by the industry.

The purpose of this proposed rule and interim rules are prudent and desperately needed. USCA urges the USDA Grain Inspection, Packers and Stockyards Administration to carry out its goal of advancing "fair and competitive trading practices for the overall benefit of consumers and American agriculture." The clarification of the P&S Act and the recognition of infractions of the Act are a crucial and imperative change to assist the USDA GIPSA in carrying out its mission.

Thank you for the opportunity to comment. If you have any questions or need additional information, please contact the USCA Washington, DC office at (202) 546-4064.

A handwritten signature in black ink that reads "Kenny Graner".

Kenny Graner
President
United States Cattlemen's Association

A handwritten signature in black ink that reads "Allan Sents".

Allan Sents
Chair, Marketing & Competition Committee
United States Cattlemen's Association