



**TEXAS
CATTLE
FEEDERS
ASSOCIATION**

5501 I-40 W.
Amarillo, TX 79106-4617
(806) 358-3681
FAX (806) 352-6026
info@tcfa.org
www.tcfa.org

Mike Engler
Chairman

Bo Kizziar
Chairman-Elect

James M. Peters
Vice Chairman

Ross Wilson
President & CEO

DIRECTORS

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Robby Kirkland
Walter E. Lasley
Bill Roser
Patrick Schwab
Dale A. Smith
Mike Thoren
Monty Wheeler
Warren White
Richard A. Winter

July 13, 2010

Via email comments.gipsa@usda.gov

Via fax (202) 690-2173

Mr. J. Dudley Butler
Administrator
USDA Grain Inspection, Packers and Stockyards Administration
Room 1643-S
1400 Independence Ave, SW
Washington, DC 20250-3604

Dear Mr. Butler:

Texas Cattle Feeders Association (TCFA) requests that the comment period on the proposed rule titled, "Implementation of Regulations Required under Title XI of the Food, Conservation and Energy Act of 2008; Conduct in Violation of the Act," be extended 120 days for a total comment period of 180 days. Secretary Vilsack has referred to this as one of the most sweeping reforms of the Packers and Stockyards Act. TCFA agrees and urges that additional time is needed to thoroughly review and understand the intended and unintended consequences this rule will have on U.S. beef producers.

We believe that Congressional intent in the 2008 Farm Bill was very clear on the language that prompted this proposed rule, and the rule goes beyond the scope intended by Congress. American cattle producers are innovators and have worked hard over the past several years to develop alternative marketing arrangements and marketing alliances so they can be better paid for the genetic, production and marketing improvements reflected in their cattle. Whether intended or not, we believe that this rule puts these marketing opportunities in jeopardy. Producers need added time to adequately conduct legal and economic analysis of the proposed rule and educate our members and policy makers regarding its impact.

To complete these tasks and make sure that all producers are treated fairly, we ask that you grant a 120-day extension to the comment period.

Thank you for your consideration.

Sincerely,

Ross Wilson
President & CEO