

# Land O'Lakes, Inc.



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Dairy Foods

September 4, 2007

John R. Mengel, Chief Economist  
USDA/AMS Dairy Programs, Office of the Chief Economist  
STOP 0229—Room 2753  
1400 Independence Ave., SW  
Washington, DC 20250—0229

RE: Dairy Product Mandatory Reporting  
Doc. # AMS—07—0047; DA—06—07  
Federal Register pages 36341-36345

Dear Mr. Mengel:

These comments, regarding the interim final rule establishing a Dairy Product Mandatory Reporting Program (Program), are filed on behalf of Land O'Lakes, Inc. Land O'Lakes is a dairy cooperative with more than 3,000 dairy farmer member-owners. The cooperative has a national membership base, whose members are pooled on six different Federal orders. Land O'Lakes owns three cheese plants and a butter/powder plant that are regulated by the Federal orders.

Land O'Lakes, Inc., fully supports the comments filed by the National Milk Producers Federation (NMPF) regarding the Program.

We urge the USDA to consider one additional comment regarding the Program:

1. Expand the specifications for nonfat dry milk prices to include nonfat dry milk manufactured using a high heat process. The costs and pricing arrangements of nonfat dry milk manufactured using a high heat process closely resemble the costs and pricing arrangements of nonfat dry milk manufactured using a low or medium heat process. Additionally, we encourage the USDA to make every effort to align the nonfat dry milk product specifications with the nonfat dry milk specifications of the California Weighted Average Prices series for nonfat dry milk that currently includes high heat powder.

#### § 1170.8 Price reporting specifications

(d) Specifications for the Nonfat Dry Milk Prices:

- (3) Include: Nonfat dry milk manufactured using low or medium or high heat process, CCC purchases...
- (4) Exclude: Sales of nonfat dry milk more than 180 days old, ~~nonfat dry milk manufactured using high heat process~~, sales of instant nonfat dry milk...

Thank you for your consideration of our comments.

Sincerely,

Thomas Wegner  
Director of Economics and Dairy Policy  
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