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William T. Sessions, Chief  
Standardization Branch  
Livestock and Seed Program  
AMS, USDA, Room 2603-S, STOP 0254,  
1400 Independence Ave, SW  
Washington, DC 20250-0254

Dear Mr. Sessions,

I was bewildered when I read the proposed language regarding antibiotic labeling on livestock and meat. If you were trying to confuse the public, you could not have done a better job. Please consider the following points:

1. Consumers cannot be expected to know that there is a distinction between "not fed antibiotics" and "raised without antibiotics." Hidden in the distinction is a loophole that allows subtherapeutic antibiotics under the claim "not fed antibiotics." This does not serve the interests of consumers and is downright misleading.
2. Along the same lines, to the average Joe, the claim "grass fed" implies the animal is 100% grass fed, not 80% grass fed which is what is allowed under this rule. The rule also makes it difficult for those producers who truly feed their animals only grass to convey that distinction to consumers.
3. Last, eliminate the "no antibiotic residue" claim. This claim essentially has no meaning since producers already withdraw antibiotics from animals before slaughter specifically to avoid antibiotic residue.

Your mission statement says "AMS constantly works to develop new marketing services to increase customer satisfaction." These new marketing claims will not increase customer satisfaction, only customer cynicism.

Thank you.

Sincerely,



Gail R. Gilbert