

March 28, 2003

Chief, Standardization Branch, Livestock & Seed Program
AMS, USDA Room 2603-S, Stop 0254
1400 Independence Ave. SW
Washington, DC 20250-0254

To Whom It May Concern:

I am writing with respect to Docket No. LS-02-02 posted to the Federal Register of Monday, December 30th, 2002 regarding the proposed United States Standards for Livestock Marketing Claims.

Of the four grain-fed standards proposed for cattle, I object to only No. 3 (Dry Matter Intake). I believe this is an unnecessary and arbitrary standard that would needlessly disqualify otherwise eligible cattle. The proposed DMI standard, for example, for a 750-pound steer would equate to 20.5 pounds. However, the same standard applied to a 500-pound heifer would be 17 pounds. Since most such heifers will not consume 17 pounds, they would be made ineligible even though they met the other three standards. We contend that as long as animals are raised a minimum 100 days on a ration that is 50 percent or more grain and averages 60 Mcal per 100 pounds of dry matter, there is no need for a Dry Matter Intake standard.

Thank you for the opportunity to provide comment on your ruling. I would welcome your feedback or questions.

Sincerely,

