

Innovative Livestock Services is grateful for the opportunity to provide written comments on the Cattle Contracts Library Pilot Program. While we understand the sentiment behind this program we are highly skeptical of reporting that could reveal trade secrets and therefore we encourage the AMS to not only follow but exceed the required confidentiality standards in this pilot program.

Specifically, we wish for components of the contract to not be identifiably linked to each other in a way that allows entire contracts to be reconstructed and that individual premium and discount schedules not be revealed. We believe a complete list of the contract components available will allow the majority of potentially helpful information to be shared while minimizing confidentiality concerns. We also request that in this pilot program, information not be sorted by reporting region, so that identities of contract parties remain confidential.

We would like to point out that as this is a pilot program, it remains possible to share more information in a full program if authorized later, however it is impossible to reclaim the confidentiality of any information shared in this pilot. Therefore we urge AMS to err on the side of releasing less detailed information in this pilot, allowing the industry to process this information and have an informed discussion of the merits and costs of providing it in a more detailed form.