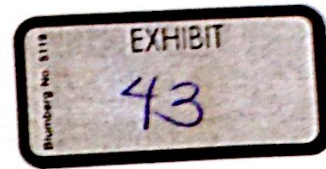


**TESTIMONY OF
LOTSEE SPRADLING**



Pecan Federal Marketing Order Hearing

Docket No. AMS-FV-15-0023; FV15-986-1

Central Region - Dallas, Texas - July 23 and 24, 2015

My name is Lotsee Spradling. It is spelled L-O-T-S-E-E S-P-R-A-D-L-I-N-G. I live near Sand Springs, Oklahoma, just west of Tulsa, Oklahoma. My family is Comanche and lived in Anadarko, Indian Territory until statehood. My parents began to assemble the Flying 'G' Ranch in the early 1920's. Flying 'G' Ranch has a pecan orchard located near the Vertigris River, Oklahoma, which we purchased in 1986. We have over 950 acres of pecans currently in production. On our farm we grow 50% improved variety pecans and 50% native pecans. We also own a retail shop that is open during harvest time November through December where we sell pecans retail as a cash crop. I was born and reared on the Flying 'G' Ranch and I went to Oklahoma State University. A copy of my resume is attached.

Under the Small Business Administration guidelines, we are classified as a small pecan grower (less than \$750,000 in gross pecan revenue).

In recent years, I have seen wide variation in the prices I have received from my pecan crop, especially our native/seedling crop. Such wide variation in pricing makes it extremely difficult to plan for the future operation of my farm. While

prices for pecans go up and down dramatically from year to year, my costs continue to increase. Cost of fertilizer, insecticides and equipment have all increased in recent years regardless of the price I receive for my crop. Some years we can barely sell our native/seedling crop.

The lack of accurate market information or any crop forecasts on the anticipated size of the pecan crop in any given year also makes it difficult for me to negotiate a fair price for my crop and to make reasonable business decisions about investments in my farm. Most of the crop estimates I see are "guesses" and they are always wrong. Increased price stability and more accurate market information would greatly benefit my small family operation.

I think my farm and the industry would also benefit in the future from grade, size, quality, packaging, shipping protocols, and other handling requirements as we compete with other tree nuts for shelf space and consumer attention.

I have reviewed the economic analysis summary prepared by Dr. Marco Palma, specifically, the projected average price increase from promotion of 6.3¢ per in shell pound for improved varieties and 3.6¢ per in shell pound for native/seedlings versus the average 2.5¢ and 1.5¢ per in shell pound cost, respectively. Overall, I am aware of the costs that the proposed federal marketing order may impose on my farm and I do not believe those costs are unduly

burdensome. I do believe that the benefits of the federal marketing order to my farm will greatly outweigh any costs associated with the federal marketing order.

I understand that under the proposed order, only growers with more than thirty acres of pecans or more than 50,000 pounds of average production per year over the last four years will be allowed to vote on the proposed order. In my opinion, this threshold is reasonable because a grower that does not meet this threshold is not a commercial grower. Any grower that is smaller than the proposed threshold could not justify the cost inherent in such a small production and is most probably merely a seller of pecans from older trees that happen to be on his or her property, a hobby farmer or one that does not plan to put all commercial inputs (fertilizer, water, etc.) on his farm.

I have been a member of the Oklahoma Pecan Growers Association since 1970. The American Pecan Board has kept our organization informed about its efforts to propose a federal marketing order. I feel like I have been informed about the process and I have been given an opportunity to participate.

In conclusion, I fully support the proposed federal marketing order for pecans and encourage the Secretary to implement the order as proposed by the American Pecan Board.

I would be glad to answer any questions anyone may have.

Lotsee Resume

Comanche Tribe: 1/2 degree

Graduated: Charles Page High School, May 1966

Graduated: Oklahoma State University, December 1970

Degree: Animal Science

Born and reared on the Flying 'G' Ranch, Sand Springs, Oklahoma

Worked on the Flying 'G' Ranch my entire life.

We raise Registered Herefords.

Started raising pecans commercially in 1970.

Bought an 800 acre pecan orchard in 1984.

Have held various positions in PTA, serving as president several times.(1980-1996)

Member of Farm Bureau from 1972 to present. Served as Tulsa County Women's chairman from 1998 to present. Served on the State Women's Committee from 2001-2006.

Sand Springs School District, School Board member for 18 years, serving as President twice.

Lifetime member of Oklahoma Cattleman's Association

Oklahoma Pecan Growers Association, member, from 1970 to present. Grower of the year in 1990.

Lifetime member of the American Quarter Horse Association.

Lifetime member of the Arabian Horse Association.

Member of the Texas and Southwestern Cattle Raisers Association.

Member American Hereford Association.

Sand Springs Hall of Fame recipient 2009.