

CONFIDENTIALMEMORANDUM

TO: Official Processor Representatives
Growout Committee
FROM: Richard L. Lobb, Communications Director
RE: Comments on GIPSA Rule
DATE: August 4, 2010

The deadline for comments on the GIPSA proposed rule is November 22. NCC will complete a legal and economic analysis well in advance of that date. In the meantime, however, we urge you to facilitate comments by your growers, particularly those whose interests would be harmed by the regulations.

Each company should contact its growers to educate them about the impact of the proposed rule and encourage them to file comments with GIPSA. We should have at least 500 (five hundred) unique comments from growers industry-wide expressing an anti-rule point of view. NCC will establish a target for each company to meet in terms of getting comments filed. Growers should also be encouraged to contact their members of Congress to express their concerns about the rule.

Attached please find two versions of "Information for Growers on the GIPSA Proposed Rules." The content is the same, but one version is on NCC letterhead and the other is on plain paper so that you can customize it as you choose. Please use as needed. A model cover letter is provided also.

We assume that the above-average or more successful growers will be more likely than others to submit comments against the rule. We leave it to your judgment which growers you should contact.

In the next few days, we will also distribute material that companies themselves can use in discussing this issue with members of Congress and other individuals and organizations. Given the time involved, however, we urge you to focus first on educating your growers and urging them to contact members of Congress and to file comments with GIPSA.

ATTACHMENTS

"Information for Growers on the GIPSA Proposed Rules." PDF, on NCC letterhead
"Information for Growers on the GIPSA Proposed Rules." MS Word, on plain paper
Model cover letter

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