



Michael Kelsey
Executive Vice President

P.O. Box 82395
Oklahoma City, OK 73148
405/235-4391 or
235-3607
FAX 405/235-3608

December 9, 2014

The Honorable Thomas J. Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

RE: Notice of Inquiry; Request for Comments on a New Beef Promotion, Research, and Information Order. Docket Number AMS-LPS-14-0081 as found on pages 66684-66686 of the *Federal Register* Vol. 79, No. 217, as published on Monday, November 10, 2014

Dear Mr. Secretary:

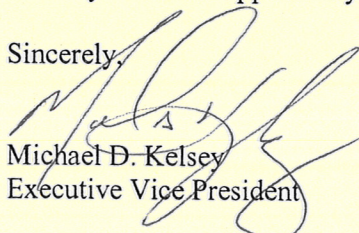
On behalf of the Oklahoma Cattlemen's Association (OCA), I appreciate the opportunity to submit these comments on the Notice of Inquiry; Request for Comments on a New Beef Promotion, Research, and Information Order, dated November 10, 2014. OCA is strongly opposed to the proposal for a new Order under the Commodity Promotion, Research and Information Act of 1996.

Representing the largest segment of Oklahoma agriculture, OCA is a trade association of cattle farmers and ranchers dedicated to the production of high quality beef with a strong commitment of stewardship for Oklahoma's precious natural resources. Our members overwhelmingly support the 1985 Beef Checkoff program and its strong demand building programs. Indeed, the most recent study about return on investment (ROI) of the Beef Checkoff led by Dr. Harry Kaiser of Cornell University concludes that each dollar invested in the Beef Checkoff between 2006 and 2013 returned \$11.20 to the beef industry. OCA believes the success of the programs of the Beef Checkoff, as evidenced by the ROI, is strongly linked to the 1985 Act. Nationally, cattle producers would seem to agree as the approval rating of the Checkoff has consistently held over 70% for many years. Your suggestion for a new Order under the 1996 Act would create inefficiencies and complicate, by adding confusion, a highly successful program.

Further, there are specific attributes of the 1996 Act that to which OCA is opposed. For instance, the 1996 Act fails to assure a coordinated state/national partnership concept. Additionally, it is too open-ended and subject to government, not producer, direction. Unlike the 1985 Act, it does not measure up to the high standards of expectation for a beef checkoff program. Therefore, OCA requests that you not issue a proposed rule for an additional beef checkoff program under the 1996 Act.

Thank you for the opportunity to provide comments.

Sincerely,


Michael D. Kelsey
Executive Vice President

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