Friday, November 30, 2007

Deputy Administrator USDA/AMS/Dairy Programs STOP - 0255 Room 2968-S 1400 Independence Avenue SW Washington, DC 20250-0225

Dear Sirs,

This is not a proposal. I would recommend that the Deputy Administrator not amend the Northwest order or conduct a hearing for the same. In the current order, the order language provides for 25% of in route class 1 distribution for the pool. From the evidence I have gathered from single months reported in the month of January of every year from 2000-2004 for order 135, the class 1 utilization ranges from 6% to 27.4%. The 124 order has a class 1 utilization of 27.4% to 43.2% from the monthly January report from 2000-2007. The average for the 135 order is 19.36% for five years of the January monthly report whereas the 124 order average class utilization is 33.15% from 2000-2007. It would seem to me that the order 124 producers would lose a lot of class 1 utilization and those class 1 revenues paid to producers if the market were expanded to include the former 135 order.

Sincerely.

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