



December 12, 2007

Ms. Dana Coale, Deputy Administrator  
Dairy Programs, AMS, USDA  
USDA-AMS-Dairy Programs  
Stop-0225, Room 2968-s  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0225  
Administrator, NW Order 124

Re: Federal Milk Marketing Order 124 expansion proposal.

Dear Deputy Administrator:

Winder Farms is a home delivery dairy located in West Valley City, Utah -- our business began in 1880, and we are the oldest dairy in the state and the 10<sup>th</sup> oldest company in Utah. We have over 30,000 customers in Utah and Nevada and are primarily a Class I plant processing 2,500,000 lbs of milk per month.


This letter is to communicate the following concerns regarding the Federal Milk Marketing Order 124 expansion proposal:

- Not being part of an order the last few years has enabled us to contract with our producers at a fixed price for six months at a time. This has been very beneficial to both sides as we now both have more predictability in our business models. If we are put back into an order we would lose the benefit of setting a fixed contract price and this would hurt both parties, and would subject end consumers to much greater price volatility.
- Having to compete within an order gives the small independents a disadvantage over our larger competitors that are owned in part by, or have special relationships with the large powerful milk co-ops.
- We are concerned that we have received no information concerning the proposal. We have only learned of the proposal by speaking to our dairy producers.

We are very much opposed to being put back into a federal milk order and fear the financial burden that will be placed upon our company if this takes place.

Thank you for considering our concerns and we would be pleased to answer any questions you may have.

Sincerely,



Mike Dutton  
CEO  
Winder Farms

