

Docket No. AO-14-A69, et al.; DA-00-03

Mr. Kenneth C. Clayton  
Hearing Clerk  
Room 1083  
South Building  
United States Department of Agriculture  
Washington, DC 20250

USDA  
2012 JUN 25 P 12:46

Dear Administrator Clayton:

RECEIVED

The milk market order system is a mess. As usual, the recent efforts to improve the system caused more problems than they solved. Butterfat prices last summer and the wild ride for the "regulated" system are a textbook example of the unexpected consequences that usually accompany bureaucratic changes in large complex systems. My suggestions are:

- Keep it simple st...d!
- Make a few small, well understood, changes that the markets can digest quickly.
- Make changes that will provide for more orderly markets with less price fluctuation than we now have.
- Make the changes that would reduce the opportunity for the manipulation of markets and apply penalties to anyone who tries to manipulate a market.
- Be careful that the changes do not "over correct" for past mistakes.
- Do something quickly, review it in 60 days, adjust it, modify it, look at it again in 60 days and keep making the small changes needed until you're satisfied you have it right.
- Change the comment period from a few months to a few weeks. This latest round of discussions should have been completed by the end of November. Initially your staff and those they deal with will say they can't move that fast. I think if you shorten your lead times by about 75% you will find that 99% of the interested parties will make your new schedule. I doubt if there has been one new idea considered since the first day you asked for comments. Most observers knew their positions before you even asked!
- Once the comments have been made, make a decision promptly.

I look forward to hearing your decision in early February.

Sincerely,

Steve Turner  
Turner Holdings, LLC