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CONFIDENTIAL

DAIRY INSTITUTE

Honorable Dan Glickman, Secretary
United States Department of Agriculture
200-A Whitten Building
1400 Independence Ave. SW
Washington, DC 20250

February 25, 1998



Dear Secretary Glickman:

On behalf of Dairy Institute of California, I am writing to request a 30 day extension to the deadline for filing of comments on the proposed rule pertaining to reform of the federal milk marketing orders (7 CFR Parts 1000 - 1139, Docket No. DA-97-12, Milk in the New England and Other Marketing Areas, Proposed Rule and Opportunity to File Comments). The current deadline for filing comments on the proposed rule is March 31, 1998. We are requesting that the deadline be extended to April 30, 1998. Dairy Institute is a trade association of dairy product processors and manufacturers. Member companies account for about 80% fluid milk, cheese, and cultured and frozen dairy products processed in California.

Federal order reform is one of the most significant changes in dairy industry regulation to occur in the past 25 years. The sheer size of the proposed rule necessitates extensive and time-consuming analysis of potential impacts. California's dairy industry does not currently operate under a federal order; however, federal order policies significantly impact competitive relationships with processors in nearby markets where federal orders are in effect. Also, at least one California producer trade organization has filed a petition for the creation of a California federal order and others are currently considering similar actions.

If a proposed rule for the creation of a California federal order is issued, the importance of having adequate time to consider all potential impacts of federal order reform is magnified. The additional 30 days for filing comments that we are requesting will give our organization time to fully examine the impacts of the proposed rule and meet with other industry participants to share information and establish a position that is in the best long-run interest of our industry. Thank you for your consideration of our request to extend the deadline for filing comments to April 30, 1998.

Sincerely yours,

Rachel Kaldor
Executive Director

cc Dan Benedetti, President, Dairy Institute of California
Linwood Tipton, IDFA
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