

RECEIVED VIA EMAIL MARCH 15, 2009

SEVEN DOVES DAIRY AND CREAMERY
18310 HEATH CREEK ROAD
MENA, ARKANSAS 71953

March 15, 2009

TO: Deputy Administrator, USDA/AMS/DAIRY programs

FROM: Terri Graves, Owner, Seven Doves Dairy / Creamery

SUBJECT: Proposal not to eliminate the producer-handler provision in all Federal milk marketing orders, and not to eliminate the exempt plant provision in all Federal milk marketing orders.

In February 2009 the International Dairy Foods Association (DFA) submitted a proposal for a public hearing to eliminate the producer-handler provision in all Federal milk marketing orders and to eliminate the exempt plant provision in all Federal milk marketing orders. I propose that neither of these proposals need to happen because;

1, (a) the producer- handler is a distinct class of dairy producers, It defines a class of local dairies that produce and bottle only their own family milk that they stand behind and sell to their neighbors and local communities. This sets them apart from the rest of the dairies that pool their milk, and the handlers that get their milk from multiple sources. The producer –handler provision needs to remain in order to identify these small family dairies.

(b) The small family owned milk plants need the exemption in order to survive in the market. The small creameries operate on very small economies of scale as compared to the huge plants that dominate the markets. Our creamery's gross sales are under \$50000 a year and the pricing and pooling charge would average over \$1200 a month forcing us to close the business.

2. In our local grocery stores there are four (4) choices of milk brands to choose from. The first three(3) are all bottle from the same plant and the raw milk is supplied by the same huge milk co-op, (DFA) only the label is changed to confuse the consumer. The forth is our local milk. The impact on eliminating the local producer-handler exemption and forcing them out of business would leave the market with only one true selection.

In summery, the elimination of the producer-handler provision, and the exempt plant provision, would at the least threaten and more likely force most of the small family owned local creameries like ours out of business. This would only allow the large milk co-op's and nation-wide milk plants to monopolize the dairy markets even more than they are now. It would remove a needed market product and give the consumers less of a choice when they shop.

Terri Graves

Owner/Operator