



**WISCONSIN
CHEESE MAKERS
ASSOCIATION**

EST. 1891

May 8, 2023

Mr. Bruce Summers
Administrator
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Administrator Summers:

I am writing in response to your April 28, 2023 letter. That letter addressed the March 30, 2023, request of the Wisconsin Cheese Makers Association (WCMA), that the U.S. Department of Agriculture (USDA) hold a hearing to update the 11 Federal Milk Marketing Orders (FMMO) so that the manufacturing (make) allowances contained in the Class III and IV price formulas be amended to reflect the most recently available industry cost data. WCMA submitted to USDA on April 14, 2023 a letter supplementing its request.

WCMA's petition indicated that its proposed amendment will be based on record evidence that WCMA anticipates will include the most current studies of Dr. Mark Stephenson published by AMS in 2022, a new study that Dr. Stephenson is undertaking to update that study to take into consideration 2022–2023 data, and a study by Dr. William Schiek of the Dairy Institute of California.

In your April 28, 2023 letter, you indicated that USDA needs additional information regarding the specific make allowance values that WCMA is requesting that the Secretary consider for adoption.

WCMA is writing to let you know that it will comply with your request fully. We understand that Dr. Stephenson will soon complete his updated cost study. With that information in hand, WCMA will have the data sets necessary to provide the requested "specific make allowance values" that WCMA is asking the Secretary to consider for adoption. We intend to do so this month.

As indicated in our April 14, 2023 letter, assuming that USDA preliminarily concludes that a hearing may be warranted (as we trust it will, given its past decisions to hold hearings to update make allowances to reflect more current manufacturing cost information), WCMA understands that USDA will, as it always has in the past, solicit additional proposals for consideration. USDA will assess whether each such proposal meets USDA's criteria for inclusion in an order hearing, and how best to structure the consideration of various proposals.

Please let me know if you have any questions.

Sincerely,

John Umhoefer, Executive Director
Wisconsin Cheese Makers Association

cc: Dana Coale, Administrator, Dairy Programs, AMS/USDA
Erin Taylor, Director, Order Formulation and Enforcement Division, AMS/USDA