The Honorable Tom Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20250  

Dear Secretary Vilsack,  

We are writing to express our concerns regarding the economic analysis for the proposed rule, published in the Federal Register by the Grain Inspection, Packers and Stockyards Administration (GIPSA) on June 22, 2010, on the marketing of livestock and poultry under the Packers and Stockyards Act.  

In the 2008 Farm Bill, Congress directed the Department to promulgate a discrete set of regulations under the Packers and Stockyards Act. However, in doing so, GIPSA also included additional proposed regulations that greatly exceed the mandate of the Farm Bill. Such a broad rule that extends so far beyond Congress’ direction in the Farm Bill and that would precipitate major changes in livestock and poultry marketing requires a vigorous economic analysis. The analysis contained in the proposed rule fails to demonstrate the need for the rule, assess the impact of its implementation on the marketplace, or establish how the implementation of the rule would address the demonstrated need.  

This proposed rule is sweeping in its scope and would have major consequences in the marketing of livestock and poultry for producers and processors of all sizes. In order for Congress and the public to evaluate this rule and its implications with full transparency, a thorough economic analysis is necessary. Our constituents need this analysis in order to participate in the rulemaking process in a meaningful way. We are asking USDA’s Office of the Chief Economist to provide such an analysis, specifically addressing the above concerns.  

Your prompt response to this request will be appreciated.  

Sincerely,  

Colin C. Peterson  
Frank D. Lucas  
David Scott  
Randy Neugebauer
Scott Murphy

Anna

Cara A. Peter

Judy Nathan

Long K. Binh

Pete Olson

Sam Farr

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Carrie Smith

Peter Roskam

Louis Schmunk

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Jim Jenk

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Jim King

John Kline

Jerry Moran