

12/23/2003 Entry: "R-CALF USA Request for Extension of Time"

FYI

December 23, 2003

Regulatory Analysis & Development

PPD, APHIS

Station 3C71

4700 River Road Unit 118

Riverdale MD 207-1238

Sent via email: regulations@aphis.usda.gov,

RE: Request for Extension of Time: Docket No. 03-080-1: Animal & Health Inspection Service, 9 CFR Parts 93, 94, and 95 Bovine Spongiform Encephalopathy; Minimal Risk Regions & Importation of Commodities Federal Register: November 4, 2003 (Volume 68, Number 213)

Dear Sir or Madam:

On behalf of the nearly 9000 voluntary members of R-CALF United Stockgrowers of America (R-CALF USA) and its 54 affiliated county and state cattle associations, representing thousands more producers, thank you for the opportunity to comment on the above referenced proposed rule. Given the significant impact this proposed rule will likely have on the United States live cattle industry, combined with the complexity of the issue itself, we respectfully request a 60-day extension to the comment period set forth in the Federal Register.

Our specific reasons for requesting the extension are as follows:

- 1) Following the November 4, 2003, notice of proposed rule in the Federal Register, R-CALF USA convened a group of livestock veterinarians and prion researchers at the earliest available date, December 11, 2003, to review the science APHIS relied on in its proposed rule. The current January 5, 2003, comment deadline provides insufficient time for R-CALF USA to properly evaluate for itself and to subsequently disseminate the information generated at this meeting to its affiliates and grassroots membership so the industry may prepare appropriate comments.

2) R-CALF USA participated in the APHIS-sponsored visit to the OIE in Paris, France, on December 15-16, 2003, which purpose was to provide U.S. cattle and beef industry representatives with first-hand information from the international disease experts at the World Organization for Animal Health (OIE) to assist the U.S. cattle and beef industries in their evaluation of the proposed rule. Again, the current January 5, 2003, comment deadline provides insufficient time for R-CALF USA to properly evaluate for itself and to subsequently disseminate the information gathered at this meeting to its affiliates and grassroots membership so the industry may prepare appropriate comments.

3) To exacerbate the challenge of reviewing such a complex and significant proposal within the allotted time-frame, the initial comment period overlays the November-January holiday season making it difficult to timely disseminate information; engage in essential communications; and to schedule meetings necessary for the industry to prepare appropriate comments.

We would respectfully request a decision on this request for extension by December 29, 2003. Thank you for your consideration of our request.

Sincerely,

Bill Bullard

CEO

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