

Mr. Bruce Summers  
Office of The AMS Administrator  
Via email: [amsadministratoroffice@usda.gov](mailto:amsadministratoroffice@usda.gov)

March 22, 2024

Dear Administrator Summers,

Thank you for your letter of March 20, 2024.

I strongly agree with your statement, "Federal Milk Marketing Orders (FMMO) issues are complex and small changes can create unintended consequences if not carefully and thoroughly considered". I also agree that the Class I Mover is of great importance to the dairy industry. However, while recognizing the truth and wisdom of those statements I fail to understand the logic used in replacing a functioning component of vital importance, with something unfounded, which ultimately compromised the entire system.

Understanding the situation leads first to recognizing the facts and getting answers to a few questions. The most obvious is that a meeting was to be convened two years after implementing the "Average Of " pricing formula to assess its' capability and overall performance in addressing specified needs, why was that meeting not held ?

During 2020 more than \$ 700 Million dollars went missing from the farmer's milkchecks, the obvious problem, large volumes of milk were being de pooled due to the new pricing formula; Class III milk was paying over \$ 9.00 more per hundredweight (cwt) than Class I milk. Why was such a strong signal ignored, that elusive meeting was originally intended for a purpose such as this, yet no meeting was held, why ?

When the "Average Of " pricing formula was rolled out, it was touted to be revenue neutral to the farmer. Where did that information originate ? Presently, U.S. Dairy Farmers have been denied over \$1.2 Billion dollars that should have been in their milkchecks, by the end of this year that total will exceed \$ 1.6 Billion dollars.

One of the more difficult situations we face today is finding reliable information to the many unanswered questions that result during situations such as this. Farmers tend to look for a bright spot on the horizon, a sign of hope is always encouraging. Last question, is the importance of the farmers role in the equation of team effort being properly recognized ?

Thank you for your attention.

Sincerely,  
Willard (Bill) Rowell