



National Grain and Feed
Association



North American Export
Grain Association

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NGFA: (202) 289-0873 NAEGA: (202) 682-4030

March 13, 2012

Mr. Randall Jones
Deputy Director
Grain, Inspection, Packers and Stockyards Administration
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250-3604

RE: Implementation of New Moisture Meter Technology

In response to the letters sent to the National Grain and Feed Association's (NGFA) Chairman Hal Reed and the North American Export Grain Association's (NAEGA) President and Chief Executive Officer Gary C. Martin on February 8 and follow-up e-mails received on March 2, the NGFA and NAEGA have additional questions regarding the Grain Inspection, Packers and Stockyards plan to transition to a new official moisture meter by September 2012.

Established in 1896, the NGFA comprises more than 1,000 member companies that operate more than 7,000 facilities and handle more than 70 percent of the U.S. grain and oilseed crop. The NGFA's membership encompasses all sectors of the industry, including country, terminal and export grain elevators; commercial feed and feed ingredient manufacturers; biofuels producers; cash grain and feed merchants; end-users of grain and grain products, including processors, flour millers, and livestock and poultry integrators; commodity futures brokers and commission merchants; and allied industries.

A not for profit trade association, NAEGA was established in 1912 and includes membership from private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA member's exports from the U.S. total approximately \$70 billion, well over 60% of total U.S. agricultural exports. NAEGA's mission is to promote and sustain the development of commercial export of grain and oilseed and their primary products. Through a reliance on member action and support, NAEGA acts to accomplish this mission from its office in Washington D.C., and in markets throughout the world.

The NGFA and NAEGA are co-located and have a joint operating agreement.

So we can provide further clarification to our members on the new moisture meter technology, we would appreciate GIPSA answering the following questions:

1. How many types of moisture meters is GIPSA planning to purchase? Will the meters used be from one vendor or multiple vendors?
2. How will the transition to the new technology be implemented?
3. Can GIPSA provide assurances that every field office and facility will be equipped with the new moisture meters, and have them functioning, by September 2012?
4. What will happen if you do not have the new moisture meter by September 2012?
5. What specific crops are being designated by GIPSA as being major fall 2012 harvested crops for which use of the new moisture meters will be required?
6. Will state agencies also be required to implement the new technology for the same crops by September 2012?
7. Will GIPSA stop using the GAC 2100 moisture meter as the official reference meter altogether? If so, when?
8. Does GIPSA have any information comparing performance, accuracy, reliability and pros/cons of each machine that has been officially approved?
9. Will facilities be directed to operate two different types of meters simultaneously during the transition? If so, how will the calibration of these devices be maintained?

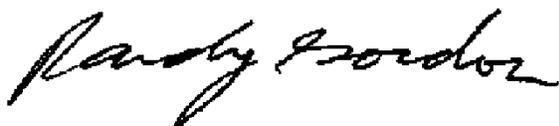
Based upon the uncertainty regarding how the new technology transfer will be administered, the length of time it will take to do so, and the time and learning curve required to inform and educate stakeholders of the upcoming change, the NGFA and NAEGA recommend that GIPSA delay implementation of new moisture meters until April 2013, at the earliest. Similar to the GAC2100 transition that occurred more than 10 years ago, we recommend that implementation of the new equipment transfer be done prior to the start of the crop marketing year; for example, April for winter wheat; July for spring wheat; and September for corn and soybeans.

The NGFA and NAEGA respectfully request an expedited response from GIPSA to this letter so that the industry can gain clarity on this matter, as it will affect industry decision making and budgets on what types of meters and equipment to purchase in the very near future.

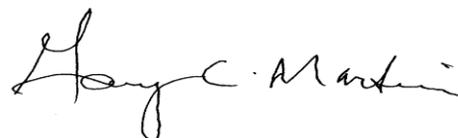
Please contact, NGFA Director of Safety and Regulatory Affairs Jess McCluer at 202-289-0873 or jmcccluer@ngfa.org, if you have any further questions or additional information.

We look forward to your response.

Sincerely,



Randall Gordon
Acting President
National Grain and Feed Association



Gary C. Martin
President and Chief Executive Officer
North American Export Grain Association