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July 17, 2006

Ms. Dana Coale, Deputy Administrator
Stop 9200, Room 1031
U.S. Department of Agriculture
1400 Independence Avenue S.W.
Washington, D.C. 20250-9200

Re: Docket No. AO-14-A73, et al; DA-03-10
USDA – Recommended Decision
Published May 17, 2006

Comments and Written Exceptions Filed On Behalf Of Grande Cheese Company

Dear Deputy Administrator Coale:

I am writing on behalf of Grande Cheese Company in support of IDFA's letter opposing changes in the current fluid milk product definition. Grande Cheese Company is a proprietary cheese processor manufacturing ... "*The finest Italian cheeses money can buy!*"® We are located in Wisconsin, employing more than 600 Associates and buying milk direct from the farm daily. We purchase more than 1.5 billion pounds annually from one of the finest milk supplies in the country. Our cheeses are sold nationally and our whey products are sold globally. All of our plants are, or can be, regulated by Federal Milk Marketing Orders. Grande Cheese is a member of the National Cheese Institute, which in turn is one of the three constituent organizations of the International Dairy Foods Association (IDFA) whose combined members represent more than 85% of the milk, cultured products, cheese and frozen desserts produced and marketed in the United States.

IDFA has addressed five major shortcomings of this recommended decision. Based on the hearing record, IDFA finds the data and analysis lacking to support the recommended changes in the current fluid milk product definition. Further, the recommended changes lack clearly defined requirements for regulatory action; going so far as to vest USDA officials with authority to make ad hoc classification decisions providing no guidance to the industry. Substitution of subjective criteria can only confuse, creating potential for disorderly marketing that can arise from decisions reached at different times or by different agency personnel. An orderly marketing criteria of the Order system is clearly violated.

Grande agrees with and supports IDFA's comments that the hearing record supports leaving the fluid milk definition as it is.

Sincerely,

A handwritten signature in black ink, appearing to read "John Fridirici".

John Fridirici
Vice President
Milk Marketing and Procurement

JIF/slr

c: IDFA