

Comments Concerning The Proposed Distributing Plant Delivery Credits Dennis Tonak for Prairie Farms

As proposed, the Distributing Plant Delivery Credits alleviates a portion of the delivery cost when supplying in-area milk (and milk from a privileged few out of area counties) to pool distributing plants. The relief granted to the specified areas will be welcome. Our particular concern is that not all out of area milk receives the same privilege as the milk from a few counties in Georgia, Virginia, and West Virginia. This treatment of these privileged counties is not fair and equitable, especially when considering the volume of milk necessary to meet the needs of the Order 5, 6, and 7 distributing plants as shown in Exhibit 8, page 9 (Order 5), page 10 (Order 6), and page 11 (Order 7).

The producer milk originating from states and parts of states that are adjacent to the Marketing Area and that delivered to pool distributing plants is shown in Exhibit 9, page 1 (Order 5), page 3 (Order 6), and page 5 (Order 7). As an example, in Order 7 for March 2022 there were 3,823,107 pounds from Kentucky that was not part of the Order 7 Marketing, 58,432,326 pounds from Texas, and 64,409,180 pounds from the restricted states. The sum of these pounds is 126,664,613. The sum is found in Exhibit _____. Also incorporated into these exhibits is the milk receipts at pool plants from Exhibit 9, page 7 (Order 5), page 8 (Order 6), and page 9 (Order 7). The last column in Exhibit _____ is the per cent of deliveries to pool plant that came from the defined areas adjacent to the Order 7 Marketing Area. There were 296,832,200 pounds received at Order 7 pool plants in March 2022. The outside milk from the specified areas accounted for 42.7% of the pool plant deliveries.

Similar information is compiled for Order 5, Exhibit ____ and Order 6, Exhibit ____.

If the proposed Distributing Plant Delivery Credits were expanded to include the additional areas listed in Exhibit _____ and also eliminate the possibility that milk receiving Distributing Plant Delivery Credits could also receive Transportation Credits, the result would be a fair and equitable solution for all.

