

April 28, 2022

Mr. Michael Sheats, Director
Livestock, Poultry, and Grain Market News Division
USDA Agricultural Marketing Service
1400 Independence Avenue, SW STOP 0249
Washington, DC 20250-0249



Director Sheats;

On behalf of our nationwide membership of independent U.S. cattle producers, the U.S. Cattlemen's Association (USCA) offers the following recommendations to help inform the design and implementation of a Cattle Contract Library (CCL) pilot project that will be managed and administered by the USDA AMS Livestock, Poultry, and Grain Market News Division.

First implemented in April 2001, the Livestock Mandatory Reporting (LMR) program requires meatpackers to report primarily prices, but also other relevant information, on purchases of cattle, swine, and boxed beef to the U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS). However, cattle producers still are unable to access to most market price information due to restrictive confidentiality guidelines restricting the publishing of that information.

A cattle contract library would certainly provide producers with additional data that could help inform their marketing decisions, and USCA wholly supports its development. But, to be useful, it must be implemented appropriately and transparently. To that end, USCA offers the following recommendations for the pilot program:

- The library should be constructed as a searchable database of individual contracts, not just as a static PDF document like the swine contract library, and not presented as aggregated summaries.
- Transaction-level data must be available and accessible. It should be simple enough that all individuals are able to read it and make sense of it. The data should also be comprehensive enough to understand what is really taking place in the marketplace. For example, current MPR combines program cattle with conventional cattle, which results in wide price swings and changes.
- The hosting technology should be all under one "roof" so that data can efficiently analyzed.
- USDA AMS should actively conduct producer outreach and education efforts, in coordination with industry groups, to provide instruction on utilizing the cattle contract library.

Obstructing or limiting access to complete data sets puts a veil on true price discovery. Thank you for the opportunity to provide these comments.

Sincerely,

Dr. Brooke Miller, M.D.
President, U.S. Cattlemen's Association