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January 12, 2017

**VIA EMAIL AND FEDERAL EXPRESS**

Ms. Elanor Starmer, Administrator  
Agricultural Marketing Service  
United States Department of Agriculture  
Room 3071-S; Stop 0201  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

**Re: Withdrawal of Proposal to Amend All Federal Milk Marketing Orders to Include a Modified Wichita Option for Organic Milk**

Dear Ms. Starmer:

The Organic Trade Association (“OTA”), on behalf of its dairy farmer and dairy processor members, hereby formally withdraws its proposal submission to amend all Federal Milk Marketing Orders (“FMMO”) to include a Modified Wichita Option for organic milk. The proposal was originally submitted on September 29, 2015 and subsequently modified on November 30, 2015.

OTA for itself and its numerous dairy farmer members and dairy processors appreciates the opportunity to submit and discuss its proposal. OTA reserves the right to resubmit its proposal, and would like to emphasize that its withdrawal of this proposal in no way reflects OTA’s acceptance of the delay this proposal faced in the pre-hearing process.

OTA continues to maintain that USDA must abide by the statutory and regulatory timelines mandated by Congress in 2008 regarding FMMO amendatory proceedings. 7 U.S.C. §608c(17) and 7 C.F.R. §§900.23 and 900.27-900.30. The public record lacks any explanation as to why OTA has received no action from USDA for over 15 months. The FMMO program depends and relies heavily on the industry trusting that the system is managed fairly and is equally applied to

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all parties. Going forward, OTA may consider resubmission, particularly if future proposals submitted by other dairy farmer or processor groups fail to receive the same level of pre-hearing scrutiny that delayed the consideration of OTA's proposal for over 15 months.

Respectfully submitted,



Chip English  
Ashley Vulin

cc: Ms. Dana Coale  
Ms. Laura Batcha