

**Preliminary Regulatory Impact Analysis
Of Proposals to Establish
A California Federal Milk Marketing Order**

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Preliminary Regulatory Impact Analysis Of Proposals to Establish A California Federal Milk Marketing Order

I. THE PURPOSE OF THIS ANALYSIS

On February 5, 2015, the Agricultural Marketing Service (AMS) received a proposal to establish a Federal Milk Marketing Order (FMMO) for the state of California on behalf of California Dairies, Inc.; Dairy Farmers of America, Inc.; and Land O' Lakes, Inc. (Cooperatives). In response to an AMS invitation, three additional proposals were submitted by the dairy industry as alternatives to the Cooperatives' proposal. In order to assess the impact of all four proposals, AMS has conducted a preliminary economic impact analysis. While the proposed California FMMO would regulate and impact the California dairy industry primarily, the analysis predicts that a California FMMO would also have an impact on the milk supply, product demand, product prices, and milk allocation throughout the United States.

A. Scope of Analysis

The estimated impacts of promulgation of a California FMMO are measured as deviations from the baseline of AMS Dairy Program's Regional Econometric Model, which is aligned with the USDA Agricultural Baseline Projections to 2024.¹ The USDA baseline and the model baseline assume: (1) the Dairy Product Price Support Program and the Dairy Export Incentive Program ended on February 7, 2014; (2) the Milk Income Loss Contract program ended on September 1, 2014; (3) the Margin Protection Program – Dairy began on September 1, 2014; and (4) the FMMO program would continue unchanged. National assumptions for the cost of feed are provided by the USDA Baseline Projections.

The regional econometric model used in this preliminary analysis simultaneously forecasts annual regional milk production, regional fluid milk and national manufactured dairy product consumption, regional dairy class utilization, national dairy product prices, and regional farm milk prices sequentially from 2014 through 2024. The explanation of the operation of the AMS Dairy Program's Regional Econometric Model specifications is available on the AMS Dairy Program website.²

The model operates under the following basic assumptions:

- Regional cow numbers are functions of the producer milk price, feed costs, slaughter prices, non-farm earnings, and/or other variables.
- Milk production per cow is estimated as a function of milk prices, feed costs, and other variables.
- All-milk price estimates that drive milk production for each region are a function of the effective blend price of the order that draws primarily from the milk supply region.
- Milk movements from the regional supplies are functions of relative blend prices between orders.
- Milk movements are summed to create pools for all markets regulated under FMMOs, California, and markets not regulated under FMMOs.
- Regional demands for fluid milk per capita consumption are functions of Class I price, income, and population under five years of age.

¹ U. S. Department of Agriculture, Office of the Chief Economist, World Agricultural Outlook Board, Interagency Agricultural Projections Committee, 2015. Long-term Projections Report OCE -2015-1.

http://www.usda.gov/oce/commodity/projections/USDA_Agricultural_Projections_to_2024.pdf

² www.ams.usda.gov/Dairy

- Milk supplies for manufactured milk products are based on total pool milk available minus volumes demanded for Class I products.
- Classifications of manufactured milk within the pools are functions of ratios of the wholesale prices to their respective class prices and other variables.
- The unregulated pool is assumed to have the same classified utilization as the sum of FMMO and California Department of Food and Agriculture (CDFA) classified utilizations, except that Class I utilization in the unregulated pool is estimated.
- National demands for manufactured dairy per capita consumption are functions of respective prices, per capita income, and other factors.
- A two-step process is used to estimate ending stocks. First, average stock values of the monthly ending stocks from the last half or last quarter of each year are estimated as functions of the product price. Second, year-end stocks are estimated from average stocks.
- Imports above the tariff rate quota and commercial exports for American cheese, other cheese, butter, non-fat dry milk and dry whey are estimated as a function of the difference between the domestic product price and the free-on-board international price.

The regional econometric model generates long term supply, demand, and price baseline projections consistent with USDA’s official baseline projections for the dairy sector. The model’s baseline projections for 2014 are updated to reflect actual data for the year. Composite actual results of analyses for butterfat and other milk components (“at test”) are used where such data is available. Otherwise, default standards are used for comparisons. The model is not able to consider intra-order movements of milk. Also, the effects of seasonal changes in production, consumption, and price cannot be analyzed on an annual basis.

B. Methods of Analysis

Baseline estimates are constructed assuming the current CDFA marketing regulations remain in place. If FMMO regulation is adopted for California, it is assumed for modelling purposes that the FMMO regulations would supersede the CDFA milk marketing regulations, beginning January 1, 2017.

This analysis estimates the expected impacts resulting from adoption of the four proposals under the following subject areas: FMMO Pricing, FMMO Classification, Fortification Allowances, Transportation Credits and Allowances, Out-of-State Milk, Producer-Handlers, Quota, and Pooling.

For each proposal, deviations from the current CDFA marketing regulations are identified and modeled. All analyses assume that all model parameters, except those that would change under each proposal, would remain unchanged during the comparison period. The impacts of the proposed regulations are then compared to the model’s baseline projections for the period 2017 through 2024. The results of this comparison are found in the tables in Appendix B.

The following indicators were selected to measure the potential impacts of the proposals:

- Changes in the uniform price, all-milk price, and producer revenues, which indicate farmers’ ability and willingness to produce milk; and
- Changes in milk marketings, Class I use, and other class prices, which measure the adequacy of milk supplies to meet fluid needs and the effect on consumer expenditures for fluid and manufactured dairy products.

II. AN EXAMINATION OF THE PROPOSALS

A. Cooperative Proposal

The Cooperatives propose a FMMO to replace the current State order operated by CDFA. The proposed FMMO includes a combination of current CDFA and standard FMMO regulations. Notable features of the Cooperatives' proposal include:

- FMMO end-product pricing formulas and product classification provisions.
- FMMO definitions and regulations for producer-handlers.
- Similar treatment of out-of-state milk as under other FMMOs.
- Transportation credits to incentivize movement of farm milk from supply areas to demand areas.
- Allowances for fluid milk fortification determined on a sliding scale.
- California's quota program would continue to be administered by CDFA, but the quota premiums would be deducted from the FMMO pool before a blend price is calculated.
- Pooling standards.

FMMO Pricing

The Cooperatives' proposal would replace current CDFA class price formulas with the end-product pricing formulas currently used in other FMMOs. FMMO pricing formulas would be used to calculate the Class I-IV prices. Current Federal order Class I differentials already in place for the State of California would be used. The principle pricing point for calculating the Class I price would be Los Angeles County, California.

FMMO Classification

The Cooperatives' proposal would alter the classification of certain dairy products to align with the FMMO product classification scheme. Affected products include half and half, buttermilk, eggnog, and aseptically packaged fluid milk.

Adjustments in classification are also made to account for fortifying Class I products as required under CDFA regulations. The table below compares CDFA classes and the proposed FMMO classes.

CDFA Class	Equivalent FMMO Class
Class 1	Class I
Class 2 & 3	Class II
Class 4b	Class III
Class 4a	Class IV

Producer-Handlers

The Cooperatives' proposal would adopt definitions and pooling regulations for producer-handlers similar to those in other FMMOs. Under FMMOs, producer-handlers are exempt from pooling and pricing as long as their Class I sales do not exceed 3 million pounds per month and they do not take delivery of more than 150,000 pounds of milk from other regulated handlers. Some who qualify as producer-handlers under current CDFA regulations would likely be ineligible for regulatory exemption under the proposed FMMO.

Additionally, under current CDFA regulations, a portion of certain producer-handlers' Class 1 sales are fully exempt from pooling. This is referred to as "exempt" quota. There are no provisions for the maintenance of "exempt" quota under the Cooperatives' proposal. These producer-handlers would have their "exempt" quota converted to regular quota as pooled producers.

Out-of-State Milk

Under the Cooperatives' proposal, milk produced outside of California and delivered to handlers in the regulated marketing area would receive at least the California uniform "blend" price (determined after quota payments). Currently, the CDFA system does not allow out-of-state milk to be pooled. Instead, handlers pay out-of-state producers a "plant blend" price based on the utilization of the receiving plant.

Fortification Allowances

Fortification allowances currently in place in California would change under the proposed FMMO.

Currently, handlers pooled under the California order receive a credit against pooling obligations for fortifying fluid milk of \$0.0987 per pound of condensed skim milk used to fortify Class 1 products. Handlers fortifying with nonfat dry milk can receive a credit of between \$0 and \$0.1985 per pound of nonfat dry milk used, depending on the difference between CDFA Class 1 Nonfat Solids and Class 4a Nonfat Solids prices.

Under the Cooperatives' proposal, handlers fortifying with condensed skim milk would receive a credit of between \$0 and \$0.0987 per pound of condensed milk used, depending on the difference between the Class I Nonfat Solids³ and Class II Nonfat Solids prices. The sliding scale related to fortification with nonfat dry milk would continue to range between \$0 and \$0.1985 per pound of nonfat dry milk used, depending on the difference between the Class I Nonfat Solids and the Nonfat Solids prices.

Transportation Credits

Under the current CDFA regulations, both producers and handlers receive credits to move milk from farms to plants and between plants. Under the Cooperatives' proposal, handlers would receive transportation credits on farm-to-plant movements between supply zones and demand zones. There would be no credit for plant-to-plant movements. The proposed transportation credit calculations can be seen below:

Transportation Credit = Mileage Rate x Eligible Milk Pounds

The mileage rate is calculated by transportation zone:

Transportation Zone 1: Mileage Rate = 0.04497 + (Mileage x (0.00318 + Fuel Adjustor Rate))

Transportation Zone 2: Mileage Rate = 0.00485 + (Mileage x (0.00546 + Fuel Adjustor Rate))

Transportation Zone 3: Mileage Rate = 0.05441 + (Mileage x (0.00571 + Fuel Adjustor Rate))

Where the Fuel Adjustor Rate = ((8 week Simple Average Number 2 Diesel Retail Price – 4.099) ÷ 5.8) ÷ 520

³ Under the Cooperatives' proposal, the Class I Nonfat Solids price would be the Class I skim milk price in the southern California zone with the highest concentration of distributing plants, divided by 9.

And,

Mileage = the shortest hard-surface highway mileage between the shipping farm and the receiving plant, up to 225 miles.

The pounds are eligible if more than 50 percent of the pool plant's utilization is Class I and/or II.

The transportation zones are defined in the Cooperatives' proposal as:

Transportation Zone 1: deliveries to plants located in the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura originating from dairy farms located in the counties of Riverside, San Diego, and San Bernardino.

Transportation Zone 2: deliveries to plants located in the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura originating from dairy farms located in all counties within the marketing area except Riverside, San Diego, and San Bernardino.

Transportation Zone 3: deliveries to plants located in the counties of Alameda, Contra Costa, Marin, Napa, Santa Clara, San Francisco, Santa Cruz, San Mateo Sacramento, Solano, and Sonoma originating from dairy farms located in all counties within the marketing area.

Quota

The Cooperatives' proposal retains the state's current quota system, with joint administration under USDA and CDFA. Quota premiums would be paid before determining the remaining marketwide pool value and the uniform minimum price paid to producers.

Under the current CDFA system and the Cooperatives' proposed FMMO, the "non-quota" blend price would be:

Non-Quota Blend at 3.5 percent Butterfat = $2.9915 \times (\text{Producer Protein Price}) + 5.6935 \times (\text{Producer Other Solids Price}) + 3.5 \times (\text{Producer Butterfat Price})$

Where the,

Producer Protein Price = $\text{Protein Price} + ((\text{PPD} \times \text{Percent of the Class III price the Protein Value Contributed from the previous year}) \div 2.9915)$,

Producer Other Solids Price = $\text{Other Solids Price} + ((\text{PPD} \times \text{Percent of the Class III price the Other Solids Value Contributed from the previous year}) \div 5.6935)$, and

Producer Butterfat Price = $\text{Butterfat Price} + ((\text{PPD} \times \text{Percent of the Class III price the Butterfat Value Contributed from the previous year}) \div 3.5)$.

The Quota Blend price is calculated as:

Quota Blend at 3.5 percent Butterfat = $\text{Non-Quota Blend at 3.5 percent Butterfat} + (0.195 \times 8.685)$.

Pooling

The Cooperatives' proposal retains current CDFA pooling provisions requiring all milk received at a California plant to be pooled. Currently, FMMOs require only handlers of primarily Class I milk to be pooled; other handlers have the option to not pool.

B. California Producer-Handler Association Proposal

The California Producer-Handler Association (CPHA) proposal was submitted in response to the Cooperatives' proposal and is addressed in this analysis as a proposed modification to the Cooperatives' proposal.

Exempt Quota for Producer-Handlers

Under current CDFA provisions, producer-handlers do not participate in the marketwide pool on the volume of "exempt" quota held. The CPHA proposal would maintain "exempt" quota for certain California producer-handlers. The CPHA proposal supports the proposed treatment of producer-handlers under the Cooperatives' proposal, but would "grandfather in" certain California producer-handlers who own "exempt" quota and would continue to recognize the exemptions.

Family Consanguinity

The CPHA proposal would revise the family consanguinity requirements stipulated in current CDFA regulations to allow more flexibility regarding inheritance of exempt quota.

C. Ponderosa Dairy Proposal

The Ponderosa Dairy Proposal was submitted in response to the Cooperatives' proposal and is addressed in this analysis as a proposed modification of the Cooperatives' proposal.

Out-of-State Milk

Under current CDFA regulations, out-of-state milk cannot be pooled and out-of-state milk producers cannot own California quota. Under the Cooperatives' proposal, out-of-state milk could be pooled and would receive the non-quota blend price. Under the Ponderosa Dairy proposal, milk produced outside of California and received at an in-state plant with fluid milk sales in the regulated marketing area would be subject to FMMO minimum pricing requirements at a level equal to or greater than the plant blend price.

D. Dairy Institute of California Proposal

The Dairy Institute of California (Institute) submitted a complete alternative to the Cooperatives' proposal. The Institute proposes a multiple component FMMO that would use modified FMMO end-product pricing formulas and current FMMO product classification. The Institute's proposal would adopt standard FMMO regulations for producer-handlers, pooling provisions, and the treatment of out-of-state milk. The Institute's proposed transportation credits, fortification allowances, and quota program would be somewhat similar to current CDFA regulations.

FMMO Pricing and Classification

The Institute's proposal would adopt the current FMMO product classification scheme as described under the Cooperatives' proposal in Section A, above. All of the CDFA class price formulas would be revised to reflect modified FMMO class price formulas using Western dairy product prices and Western manufacturing costs instead of national prices and costs. If Western dairy product prices and Western manufacturing costs are not available, the Institute proposal provides default values. For the purpose of this analysis, the default values are used in the following proposed price formulas. Additionally, the Class III price is proposed to be calculated based solely on block cheddar cheese prices.

Class I Price

Class I Price = (0.965 x Class I Skim Price) + (3.5 x Class I Butterfat Price)

1. Class I Skim = Class I Differential + Higher of Advanced Class III or Class IV Skim Price
2. Class I Butterfat = (Class I Differential ÷ 100) + Advanced Butterfat Price
3. Class I Fluid Carrier = (Class I Skim Price x 0.24) ÷ 91
4. Class I Nonfat Solids Price = (Class I Skim Price x 0.76) ÷ 9

Class II Price

Class II Price = (0.965 x Class II Skim Price) + (3.5 x Class II Butterfat Price)

1. Class II Skim = Advanced Class IV skim + 0.70
2. Class II Nonfat solids = Class II Skim ÷ 9
3. Class II butterfat = Butterfat Price + 0.007

Class III Price

Class III Price = (0.965 x Class III Skim Price) + (3.5 x Butterfat Price)

1. Class III Skim = (3.1 x Protein Price) + (5.9 x Other Solids Price)

Class IV Price

Class IV Price = (0.965 x Class IV Skim Price) + (3.5 x Butterfat Price)

1. Class IV Skim Price = Nonfat Solids Price x 9

Component Price Calculations

Butterfat Price = (Butter Price – 0.1932) x 1.211

Nonfat Solids Price = (Nonfat Dry Milk Price – 0.2254) x 0.99

Protein Price = ((40 Pound Cheddar Cheese Block Price – 0.2631) x 1.383) + (((40 Pound Cheddar Cheese Block Price - 0.2631) x 1.572) - (0.9 x Butterfat Price)) x 1.17)

Other Solids Price = (Dry Whey Price - 0.2394) x 1.03

Somatic Cell Adjuster = 0.0005 x (350 - Somatic Cell Count)

Advanced Price Calculations

Advanced Class III Skim Price = (3.1 x Advanced Protein Price) + (5.9 x Advanced Other Solids Price)

Advanced Class IV Skim Price = Advanced Nonfat Solids Price x 9

Advanced Butterfat Price = (Advanced Butter Price - 0.1715) x 1.211
Advanced Protein Price = ((Advanced 40 Pound Cheddar Cheese Block Price - 0.2631) x 1.383) +
(((Advanced 40 Pound Cheddar Cheese Block Price - 0.2631) x 1.572) - (0.9 x Advanced Butterfat Price))
x 1.17)
Advanced Other Solids Price = (Advanced Whey Price - 0.2394) x 1.03
Advanced Nonfat Solids Price = (Advanced Nonfat Dry Milk Price - 0.2254) x 0.99

Producer-Handlers

Under the Institute's proposal, producer-handler provisions would align with definitions adopted by other existing FMMOs.

Pooling

Pooling under the Institute's proposal would be optional except for distributing plants, similar to current FMMOs. The Institute's proposed order would also provide manufacturing plant shipping standards that are adjusted depending on milk utilization across the state.

The proposal also attempts to deter milk from leaving the marketwide pool by establishing re-pooling standards similar to those in some other FMMOs. For the months of April through February, handlers who had previously de-pooled milk could not re-pool more than 125 percent of the producer milk receipts they pooled during the previous month. For March, the re-pooling limit would be 135 percent.

Quota milk would also be subject to certain shipping requirements.

Out-of-State Milk

The current CDFA system does not permit out-of-state milk to be pooled. Under the Institute's proposal, out-of-state milk could be pooled, and qualifying out-of-state producers would receive a non-quota blend price.

Transportation Credits and Allowances

The Institute's proposal would provide transportation credits and allowances similar to those currently provided under the CDFA program. Transportation credits for plant-to-plant movement of bulk milk, skim milk, or condensed skim milk would be available to handlers. Transportation allowances for producers would continue for ranch-to-plant movement of milk to plants with Class I and/or II utilization greater than 50 percent. The transportation credit calculations would be the same as under current CDFA regulations, with two exceptions: there would no longer be a transportation credit for milk moving from Sonoma to Alameda, San Francisco, or Santa Clara Counties; and there would be a one cent increase in the transportation credit for milk moving from Merced and Stanislaus Counties to Solano and Sonoma Counties. The differences in transportation allowances under the current CDFA regulations and the Institute's proposal are shown in Table 1.

Fortification Allowances

The fortification allowances in California would change slightly under the Institute's proposal. The payment (per pound of product used) for condensed skim fortification would be between \$0 and \$0.0987, and the payment for nonfat dry milk fortification would continue to be between \$0 and \$0.1985, with the

two rates dependent on the differences between the Class I Nonfat Solids Price and the Class II Nonfat Solids or the nonfat solids price, respectively.

Quota

One significant difference between the current CDFA system and the Institute's proposal is the operation of the quota program. Under the Institute's proposal, producers would have the ability to opt out of the quota program and instead receive a traditional FMMO blend price. This is a one-time decision that could be made prior to any month; once a producer opts out, he or she could not opt back in. Producers who opt out of the quota program would receive the California FMMO blend price for all their pooled milk. Funds remaining in the marketwide pool after payment of the FMMO blend price would then be turned over to CDFA for re-blending to determine quota value.

Table 1. Comparison of Transportation Credits Under Current CDFA Regulations and the Institute’s Proposed Regulations.

CDFA Regulations				Institute Regulations			
Supply County	Deficit County	Miles	Dollars Per CWT	Supply County	Deficit County	Miles	Dollars Per CWT
All CA Counties	Alameda, Contra Costa, Santa Clara, Santa Cruz, San Francisco, and San Mateo	0 through 78	0.41	All CA Counties	Alameda, Contra Costa, Santa Clara, Santa Cruz, San Francisco, and San Mateo	0 through 78	0.31
		Over 78 through 199	0.47			Over 78 through 199	0.37
		Over 199	0.65			Over 199	0.45
All CA Counties	Sacramento	0 through 59	0.17	All CA Counties	Sacramento	0 through 59	0.17
		Over 59	0.23			Over 59	0.23
All CA Counties	Shasta	0 through 29	0.13				
		Over 29 through 49	0.16				
		Over 49	0.19				
All CA Counties	Marin, Napa, Solano, and Sonoma	0 through 45	0.23	All CA Counties	Marin, Napa, Solano, and Sonoma	0 through 45	0.23
		Over 45 through 96	0.37			Over 45 through 96	0.27
		Over 96	0.46			Over 96	0.36
Riverside and San Bernardino	Los Angeles, Orange, Riverside, San Bernardino, and Ventura	0 through 93	0.15	Riverside	Los Angeles, Orange, Riverside, San Bernardino, Ventura and San Diego		
		Over 93	0.46			Over 93	0.36
				San Bernardino	Los Angeles, Orange, Riverside, San Bernardino, Ventura and San Diego	Over 93	0.16
All Other CA Counties than Riverside and San Bernardino	Los Angeles, Orange, Riverside, San Bernardino, and Ventura	0 through 79	0.15	All Other CA Counties than Riverside and San Bernardino	Los Angeles, Orange, Riverside, San Bernardino, Ventura and San Diego		
		Over 79 through 99	0.46			Over 79 through 99	0.16
		Over 99 through 119	0.67			Over 99 through 119	0.37
		Over 119 through 155	0.84			Over 119	0.54
		Over 155	0.91				
All CA Counties	San Diego	0 through 79	0.15	San Bernardino			
		Over 79 through 119	0.46				
		Over 119	0.84				

III. ANALYSIS OF BENEFITS AND COSTS

A. Introduction

This section describes the methodology of determining potential benefits and costs resulting from abandoning current CDFA regulations and adopting each of the four proposals described herein. Instances where features of a proposal could not be modeled are noted. The forecasted impacts of adoption of each proposal are described as deviations from the model baseline as adapted from the USDA dairy baseline projections.

B. Cooperative Proposal

For the purpose of this analysis, USDA has identified key areas where the Cooperatives' proposed FMMO differs significantly from current CDFA regulations. The Cooperatives' proposal would establish fundamentally different methods to address milk pricing, classification, treatment of out-of-state milk, treatment of producer-handlers, transportation allowances and credits, and fluid milk fortification. The Cooperatives' proposal would maintain both the quota program and "inclusive" pooling as they currently operate under CDFA regulations, so no deviation from the baseline is measured for those features.

FMMO Pricing

The current FMMO pricing equations are used in the model to calculate CA FMMO classified prices. The CA FMMO prices are then used to calculate quota and non-quota blend prices at 3.5 percent butterfat. Quota, non-quota, and statewide blend prices at test are also calculated.

FMMO Classification

The Cooperatives' proposal would align the California milk classification system with the equivalent FMMO classes as outlined below:

CDFA Class	Equivalent FMMO Class
Class 1	Class I
Class 2 & 3	Class II
Class 4b	Class III
Class 4a	Class IV

Additional classification changes would include:

- Reassigning buttermilk from CDFA Class 2 to FMMO Class I;
- Reassigning nonfat solids used to fortify fluid milk products from CDFA Class 1 to FMMO Class IV;
- Reassigning condensed solids used in fortifying fluid milk products from CDFA Class 1 to FMMO Class IV;
- Reassigning the Class I skim volume increase due to fortifying fluid milk products from CDFA Class 4a to FMMO Class I;

Changes in classification for eggnog and aseptically packaged fluid milk are not accounted for due to lack of available data.

Quota and Pooling

The Cooperatives' proposal would maintain the current CDFA quota system along with the "inclusive" pooling provisions. There are no changes from the baseline for quota or inclusive pooling.

Out-of-State Milk

Under the Cooperatives' proposal, out-of-state milk, currently unregulated under the CDFA order, would become regulated under the California FMMO and receive the "non-quota blend price." For the purpose of this analysis, volumes of out-of-state milk entering California are expected to remain at current levels.

The model makes the following assumptions:

- A three-year average of out-of-state milk movements is used for the forecast period.
- In the baseline, California Class I sales from out-of-state handlers are accounted for in the California regional fluid milk demand estimate. To account for the proposed regulation of those sales, that volume is instead accounted for as unregulated Class I sales.
- Under the Cooperatives' proposal, out-of-state milk movements into California are removed from the unregulated region and are pooled on the California FMMO.
- A significant volume of out-of-state milk coming into California is used for fluid milk.
- Under the Cooperatives' proposal, out-of-state Class I sales are added back into the CA Class I utilization.

Producer-Handlers

In this analysis, "exempt" quota owned by producer-handlers is considered to be pooled and priced. "Exempt" quota milk is addressed similarly under the baseline to out-of-state milk, where estimated Class I fluid demand is reduced by the amount of exempt quota milk to calculate the CA Class I utilization. In this analysis, "exempt" quota is converted to regular quota, and consequently the quota nonfat solids volume increases.

Transportation Allowances and Credits

The Cooperatives' proposal includes a system of transportation credits that are similar to the current CDFA regulations. The proposal would partially reimburse transportation costs for delivery of milk from supply areas to deficit areas, commonly referred to as "ranch to plant" shipments. These credits are funded through deductions from the marketwide pool.

This analysis compares actual payments for transportation allowances under the current California order to expected payments, had the Cooperative proposal been in place for 2014. Results indicate a 2.234 percent increase in payments under the Cooperatives' proposal. The actual yearly average CDFA transportation credit payments for 2011-2013, increased by 2.234 percent, are then used to project transportation credits for the forecast years of 2017-2024.

The Cooperatives' proposal does not provide for credits on plant-to-plant milk movements; that volume is reduced to zero in the analysis.

Fortification Allowances

The condensed skim and nonfat dry milk fortification allowances outlined in the Cooperatives' proposal are calculated using the FMMO Class I SNF, Class II SNF, and nonfat solids prices. The calculated allowances are multiplied by 2011 - 2013 CDFA three-year average of nonfat solids in condensed skim and nonfat dry milk. The total fortification allowance value is then removed from the total pool value to calculate the producer butterfat, protein, and other solids prices.

1. Impacts on Dairy Farmers

To evaluate the impact of the Cooperatives' proposal on dairy farmers, changes in the California and ten existing FMMOs' statistical uniform blend prices at 3.5 percent butterfat (3.5 BF) (Table B1) and at test (Table B2) are considered. Also, changes in dairy product prices (Table B3), all-milk prices (Table B4), milk production (Table B5), total milk marketings (Table B6), and producer revenue (Table B7) in the 14 regions are considered.

This analysis forecasts that adoption of the Cooperatives' proposal would increase total California producer revenue by an average of \$700 million per year across the 2017 to 2024 forecast period (Table B7). The proposal would also increase the CA all milk price by \$1.03 per cwt. (Table B4) and increase CA milk production by 540 million pounds (Table B5). Adoption of the Cooperatives' proposal would also increase the statistical uniform California FMMO price by \$0.94 per cwt (Table B1). Given the current volume of milk production in California (in excess of 20 percent of total U.S. production), this increase would likely lead to lower uniform prices, lower milk production, lower all-milk prices, and lower producer revenues across most of the rest of the United States. An exception is observed in the currently unregulated areas of the former Western (FW) FMMO, covering parts of Utah, Idaho, and Nevada, where modest increases in producer revenue and increases to the all-milk price would be similar to those observed in California.

2. Impacts on Fluid Milk Processors and Dairy Product Manufacturers

To evaluate the impact of the Cooperatives' proposal on fluid milk processors and dairy product manufacturers, Dairy Product Prices (Table B3), FMMO Component Prices (Table B8), FMMO Class Prices at 3.5 BF (Table B9), CA to FMMO Class Prices at 3.5 BF (Table B10), FMMO Class Prices at Test (Table B11), and National Class Utilization (Table B13) are considered.

This analysis forecasts that adoption of the Cooperatives' proposal would decrease national prices for cheddar cheese, butter, nonfat dry milk, and dry whey for the analysis period of 2017-2024 (Table B3). The analysis observes modest increases in the protein price (Table B8) stemming from sharp declines in the butter price. There are also slight declines in the nonfat solids and other solids prices, but the changes round to zero.

The observed declines in dairy product and component prices lead to lower FMMO Class Prices, except in the Class III skim milk price (Table B9). The Class III skim price is driven upward by the higher protein price, and leads to a slightly higher Class I skim price than otherwise expected during those months when the Class III skim price is above (higher than) the Class IV skim price (and used as the basis of the Class I skim price). The majority of fluid milk bottlers and dairy product manufacturers already regulated by an existing FMMO may experience slightly lower raw milk costs (Table B11).

Impacts on California fluid milk processors and dairy product manufacturers that may fall subject to FMMO regulation as proposed by the Cooperatives are mixed. Overall, observed impacts on California FMMO prices across the observation period of 2017-2024 point to a decrease in the CA Class I price

(-\$0.81), and increases in the Class II (\$.78), III (\$1.84), and IV (\$0.35) prices (Table B11). The California Class I price decreases even though the California Class II, III, and IV prices increase because of the change from CDFA pricing formulas to FMMO pricing formulas.

Since the baseline in this analysis uses current CDFA price formulas, the Class I price changes to FMMO at 3.5 BF (Table B10) are useful for comparison. However, minimum class prices “at test” are the regulated prices fluid milk processors and dairy product manufacturers must pay and are referenced for the best assessment of handler impacts (Table B11).

This analysis compares the California Class 1 price to the FMMO Class I price, a weighted average of the CDFA Class 2 and 3 prices to the FMMO Class II price, the CDFA Class 4b price to the FMMO Class III price, and the CDFA Class 4a price to the FMMO Class IV price.

CDFA Class	Equivalent FMMO Class
Class 1	Class I
Class 2 & 3	Class II
Class 4b	Class III
Class 4a	Class IV

3. Effects on Consumer Retail Prices

This analysis is unable to estimate the potential impacts of the Cooperatives’ proposal on retail prices, and thus consumers. In general, changes in all-milk and wholesale product prices are passed through to consumers, but how fast those changes occur is undetermined. This analysis assumes that any increases or decreases in raw milk costs to fluid processors or dairy product manufacturers would rapidly pass through wholesale and retail sales chains with little impact on margins.

4. International Trade Impacts

Because of the bulky and perishable nature of packaged fluid milk, most international trading of dairy products is in manufactured products. The analysis suggests that a decrease in domestic national dairy product prices (Table B3) could suppress imports of dairy products into the United States (Table B15) and stimulate exports of U.S. dairy products abroad (Table B16).

C. California Producer-Handler Association Proposal

The CPHA Proposal was submitted as a partial alternative to the Cooperatives’ proposal. The CPHA proposal is modeled similarly to the Cooperatives’ proposal, with one exception: “exempt” quota milk is excluded from the California FMMO pooling and pricing regulations. As a result, less Class I milk is pooled than would be under the Cooperatives’ proposal, and the volume of California nonfat solids quota participating in the marketwide pool reverts back to that assumed under current CDFA regulations (baseline). Since the results of the analysis for the CPHA proposal are similar to those observed for the Cooperatives’ proposal, this section highlights differences between the results under the two proposals.

The proposed change by the CPHA to the definition of family consanguinity is not modeled.

1. Impacts on Dairy Farmers

The analysis for the CPHA proposal relies on the same type of tables (Tables B17-B32) as discussed for the Cooperatives' proposal. Results of the CPHA analysis are similar to the Cooperatives' proposal, and show increases in the CA statistical uniform price (Table B17), CA effective blend price at test (Table B18), CA all-milk price (Table B20), CA production (Table B21), and CA producer revenues (Table B23).

A few modest differences in observed results for the CPHA proposal compared to the Cooperatives' proposal that would affect dairy farmers, other than producer-handlers, include the following:

- The Southeast blend price at test rounds to one cent less than under the Cooperatives' proposal.
- The California all-milk price rounds to one cent less than under the Cooperatives' proposal.
- The Florida all-milk price rounds, on average, to one cent more than under the Cooperatives' proposal.
- On average, the U.S. producer revenues round to 10 million dollars less than under the Cooperatives' proposal.

2. Impacts on Fluid Milk Processors and Dairy Product Manufacturers

As under the Cooperatives' proposal, fluid processors and dairy product manufacturers would be affected by lower dairy product prices (Table B19), lower minimum FMMO butterfat prices, (Table B24), lower FMMO Class prices (except for Class III skim) (Table B25). CA Class prices (except for Class I and IV) at 3.5 BF (Table B26) are higher. National dairy product prices and FMMO class prices at 3.5 BF are nearly identical under the CPHA and Cooperatives' proposals.

While Class prices at 3.5 BF are useful for comparison, the prices at test impact the minimum prices fluid milk processors and dairy product manufacturers must pay. Under the CPHA proposal, most class prices at test (Table B27) round to the same as under the Cooperatives' proposal. The largest difference is in the CA Class I price, which is 13 cents lower under the CPHA proposal because less Class I milk is pooled under that proposal. The Florida (FL) Class I price is one cent lower, and the Upper Midwest (UM) Class IV price is one cent higher under the CPHA proposal. Class II prices are one cent higher in the Southeast (SE), Mideast (ME), Pacific Northwest (PN), and Southwest (SW) FMMOs under the CPHA proposal. The pooled CA Class I, II, and IV utilizations (Table B29) decrease more in the CPHA proposal than under the Cooperatives' proposal. CA Class I revenues are \$46.8 million less than under the Cooperatives' proposal.

The analysis reveals that the volume of Class I milk available nationally under the CPHA proposal is the same as under the Cooperatives' proposal. The volume of milk available nationally for manufacturing is 555 million pounds more per year on average (Table B29), 6 million pounds less than under the Cooperatives' proposal.

3. Effects on Consumer Retail Prices

This analysis cannot estimate the potential impacts of the CPHA proposal on retail prices, and thus consumers. In general, changes in all-milk and wholesale product prices are passed through to consumers, but how fast those changes occur is undetermined. This analysis assumes that any increases or decreases in raw milk costs to fluid processors or dairy product manufacturers would rapidly pass through wholesale and retail sales chains with little impact on margins.

4. International Trade Impacts

Because of the bulky and perishable nature of packaged fluid milk, most international trading of dairy products is in manufactured products. As under the Cooperatives' proposal, the decrease in the domestic national dairy product prices (Table B19) is projected to suppress imports of dairy products into the United States (Table B31) and stimulate United States exports of dairy products abroad (Table B32). Under the CPHA proposal, imports of other than American cheese would be slightly less than under the Cooperatives' proposal, while butter imports would be slightly more. Exports of all products except butter would be greater under the CPHA proposal than under the Cooperatives' proposal.

D. Ponderosa Dairy Proposal

The Ponderosa Dairy proposal was submitted in response to the Cooperatives' proposal. The Ponderosa Dairy proposal is modeled similarly to the Cooperatives' proposal, with one exception: milk produced outside of California and received at an in-state plant with fluid milk sales in the regulated marketing area would be subject to FMMO minimum pricing requirements at a level equal to or greater than the plant blend price, and would not be pooled. As a result, handlers would not contribute into the marketwide pool for that milk received from out-of-state producers, thus lowering the total value of the marketwide pool.

Most of the results for the Ponderosa proposal are very similar to those for the Cooperatives' proposal because the analysis assumes the same provisions, except for those addressing the pooling of out-of-state milk. In general, the forecasted impact from adoption of the Ponderosa proposal is smaller than the impact from the complete Cooperatives' proposal because the treatment of out-of-state milk would be similar to that under current CDFA regulations. Since the results of the analysis for the Ponderosa proposal are similar to those observed for the Cooperatives' proposal, this section highlights differences between the results under the two proposals

1. Impacts on Dairy Farmers

Results of the analysis for the Ponderosa proposal can be found in Tables B33-B48. Results of the Ponderosa analysis are similar to those under the Cooperatives' proposal, and find increases in statistical uniform (Table B33), CA effective blend price at test (Table B34), CA all-milk price (Table B36), CA production (Table B37), and CA producer revenues (Table B39).

A few differences in observed results include:

- The CA statistical uniform price, CA blend price at test, CA all-milk price, and Former Western all-milk price round, on average, to one cent less than prices under the Cooperatives' proposal.
- The CA quota and non-quota prices at 3.5 BF and at test also round, on average, to one cent less than under the Cooperatives' proposal.
- The Northeast (NE) and Appalachian (AP) statistical uniform prices round to an average one cent more than under the Cooperatives' proposal.
- The Florida, Southeast, Central (CE), and Southwest blend prices round, on average, to one cent more than under the Cooperatives' proposal.
- The all-milk prices in the Northeast and in Florida also round, on average, to one cent more than under the Cooperatives' proposal.
- The Upper Midwest milk production is 10 million pounds less than under the Cooperatives' proposal.

The decreases in cheddar cheese, nonfat dry milk, butter, and dry whey prices (Table B35), on average, are similar to those under the Cooperatives' proposal.

Overall, the expected effects of adopting the Ponderosa proposal on dairy farmers are similar to those under the Cooperatives' proposal, with slightly smaller impacts.

2. Impacts on Fluid Milk Processors and Dairy Product Manufacturers

Under the Ponderosa proposal, fluid processors and dairy manufacturers would be affected by lower dairy product prices (Table B35); a lower minimum FMMO butterfat price (Table B40); lower FMMO Class prices at 3.5 BF (Table B41), except for the Class III skim price; and a lower CA Class I price at 3.5 BF (Table B42). After rounding, adoption of the Ponderosa proposal results in the same prices for all dairy products except butter, which is one cent higher than under the Cooperatives' proposal. FMMO class prices at 3.5 BF would be the same as under the Cooperatives' proposal, except for the Class I skim and Class III skim, which would be one cent lower, and Class II and IV prices, which would each be one cent higher.

While the Class prices at 3.5 are useful for comparison, the prices at test impact the minimum prices fluid milk processors and dairy product manufacturers must pay. Under the Ponderosa proposal, all classified prices at test (Table B43) round to the same as under the Cooperatives' proposal except for:

- The decrease in CA Class I price is \$0.34 greater;
- Increases in CA Class II and IV prices are one cent greater;
- Decreases in Appalachia (AP), Florida, and Arizona (AZ) Class I prices are one cent greater;
- Class II prices in all the FMMOs are one to two cents more; and
- Class IV prices in all the FMMOs are one to two cents more.

The volume of Class I milk available nationally remains unchanged from the Cooperatives' proposal, but less Class I milk would be pooled in California. The volume of milk available nationally for manufacturing would average 556 million pounds (Table B45) more per year on average, 5 million pounds less than under the Cooperatives' proposal. This decrease is due to slightly less overall U.S. milk production.

3. Effects on Consumer Retail Prices

This analysis cannot estimate the potential impacts of the proposal on retail prices, and thus consumers. In general, changes in all-milk and wholesale product prices are passed through to consumers, but how fast those changes occur is undetermined. This analysis assumes that any increases or decreases in raw milk costs to fluid processors or dairy product manufacturers would rapidly pass through wholesale and retail sales chains with little impact on margins.

4. International Trade Impacts

Because of the bulky and perishable nature of packaged fluid milk, most international trading of dairy products is in manufactured products. This analysis observes similar impacts to those expected under adoption of the Cooperatives' proposal, including decreasing domestic national dairy product prices (Table B35), decreasing imports of dairy products into the United States (Table B47), and increasing exports of United States dairy products abroad (Table B48).

Under the Ponderosa proposal, imports of other than American cheese would be slightly less than under the Cooperatives' proposal, while butter imports would be slightly more. Exports of cheese and dry whey would be greater, while exports of butter and nonfat dry milk would be slightly less than under the Cooperatives' proposal.

E. Dairy Institute of California Proposal

This analysis estimates the expected impacts resulting from adoption of the Institute's proposal for the following: FMMO pricing, FMMO Classification, Fortification Allowances, Transportation Credits and Allowances, Out-of-State Milk, Producer-Handlers, Quota, and Pooling.

FMMO Pricing

The Institute's proposal would adopt the current FMMO product classification scheme as described in Section A, above. The proposal would adopt current FMMO end product price formulas, with some modifications. First, the proposal seeks to utilize FMMO pricing formulas that are established using western dairy product prices and western manufacturing costs instead of national prices and costs. If western dairy product prices and western manufacturing costs are not available, the Institute's proposal provides for relying on default values. For the purpose of this analysis, the default values are used. Use of the default values results in CA FMMO component prices used in this analysis that are below component prices used in analyzing the impacts to other FMMOs.⁴

The proposal also relies on the block cheddar price to establish the California protein price, as opposed to a block/barrel price as currently used in FMMO price formulas. Additionally, the Class I price would include a Class I nonfat solids price and Class I "fluid carrier" price. The fluid carrier is described in the proposal as the portion of skim milk that is not nonfat solids.

To estimate the impact of the Institute's price formula alternatives, block/barrel prices⁵ and cheddar block prices⁶ from 2000-2014 were compared. The block price was observed to be on average, one cent lower than the block/barrel price. Therefore, to analyze the Institute's pricing formulas, the model's block/barrel price is reduced by one cent to represent the proposal's suggested pure block price in the CA FMMO protein price formula.

FMMO Classification

The Institute's proposal would classify dairy products in the same manner as in the Cooperatives' proposal. In turn, this analysis makes the same assumptions for both proposals.

⁴ CA FMMO butterfat price is 2.63 cents lower than the FMMO butterfat price.
CA FMMO nonfat solids price is 5.70 cents lower than the FMMO nonfat solids price.
CA FMMO protein price is 20.69 cents lower than the FMMO protein price.
CA FMMO other solids prices is 4.15 cents lower than the FMMO other solids price.

⁵ AMS Announcement of Class and Component Prices Report. Prior to April 2012, this data was published by the National Agricultural Statistics Service in *Dairy Products Prices*.

⁶ National Dairy Product Sales Report average monthly cheddar block price, weighted by weekly sales.

Fortification Allowance

The fortification allowances currently in place in California would change slightly under the Institute's proposal. The payment (per pound of product used) for condensed skim fortification would be between \$0 and \$0.0987, and the payment for nonfat dry milk fortification would continue to be between \$0 and \$0.1985, with the two rates dependent on the differences between the Class I Nonfat Solids Price and the Class II Nonfat Solids or the nonfat solids price, respectively.

This analysis determines the total value of fortification allowances provided to fluid milk bottlers under the Institute's proposal by computing a three-year average using 2011 - 2013 CDFA data on the nonfat solids content in condensed skim milk and nonfat dry milk. This figure is then used to estimate impacts to the overall value of the marketwide pool.

Transportation Credits and Allowances

The Institute's proposal would provide transportation credits and allowances similar to those currently provided under the CDFA program. Transportation credits for plant-to-plant movement of bulk milk, skim milk, or condensed skim milk would be available to handlers. The transportation credit calculations would be the same as under current CDFA regulations, with two exceptions: there would no longer be a transportation credit for milk moving from Sonoma to Alameda, San Francisco, or Santa Clara Counties; and there would be a one-cent increase in the transportation credit for milk moving from Merced and Stanislaus Counties to Solano and Sonoma Counties.

Transportation allowances for producers would continue for ranch-to-plant movement of milk to plants with Class I and/or II utilization greater than 50 percent. Relying on the same methods of analysis as with the Cooperatives' proposal, the transportation allowances and credits under the Institute's proposal are calculated using 2014 CDFA data. Results indicate the Institute's proposal would result in a 38.52 percent decrease in total deductions from the pool for the payment of transportation allowances and credits than what was actually paid in 2014. In turn, the analysis then relies on the actual yearly average CDFA transportation credit payments for 2011-2013, decreased by 38.52 percent. The result is estimated to be the future outlays for the payment of transportation credits and allowances for the forecast years of 2017-2024.

The differences in transportation allowances under the current CDFA regulations and the Institute's proposal are shown in Table 1 above.

Out-of-State Milk

The current CDFA system does not permit out-of-state milk to be pooled. Under the Institute's proposal, and in this analysis, out-of-state milk could be pooled by meeting certain performance requirements, and qualifying out-of-state producers would receive the non-quota blend price.

Producer Handlers

Producer-handlers with exempt quota milk are similarly addressed as in the analysis for the Cooperative proposal. The Institutes' proposal would establish the same producer handler provisions as the Cooperatives' proposal. In turn, this analysis makes the same assumptions for both proposals.

Quota

Under the Institutes' proposal, the CDFA administered quota program would continue to exist, although participation would be optional.

In order to determine the potential impact of optional quota program participation under the Institute's proposal, the volume of milk that would potentially not participate in the California quota program, and the point at which the decision would be made to participate, had to be determined. To do so, this analysis relies on current CDFA quota ownership data, CA FMMO blend prices forecasted starting in 2017, the CA quota price and the CA overbase price.⁷ The analysis assumes that quota holders will compare their weighted quota blend price⁸ against the CA FMMO blend price and will choose to receive whichever is higher.

Since the CA FMMO blend price would be higher than the weighted quota blend price, if a producer only owns small amounts of quota, they would most likely choose to not participate in the quota pool. Under the proposal, the decision would be irrevocable. As more quota holders permanently exit, the value of the quota pool decreases leading to larger quota holders choosing the CA FMMO blend price over their weighted quota blend price.

The analysis observed that after the 1st decision point (which could be considered one month), quota holders with less than or equal to 25 percent of their production under quota will choose the California FMMO blend. After the 2nd decision point, quota holders with less than or equal to 85 percent of their production under quota will choose the California FMMO blend. After the 3rd decision point, the analysis predicts that all California producers would choose the California FMMO blend price over the weighted quota blend price.

Pooling

Current CDFA regulations require all non-exempt California plants to participate in milk pooling. The Institute's proposal would give handlers that do not bottle milk the option to participate in the marketwide pool. Since there is no historical data on milk not pooled in California, a way to analyze the impact of these pooling decisions was developed.

The pooling provisions proposed by the Institute are similar to those in the Upper Midwest FMMO, which, like California, has a high share of manufacturing milk. The methodology uses 2000 through April 2015 data on Upper Midwest manufacturers' monthly milk pooling decisions to show how those decisions change with the difference between their Class price and the uniform producer blend price.⁹ This analysis shows that manufacturers in the Upper Midwest choose to pool less milk when their Class II, III, or IV price is high relative to the uniform price; and this analysis assumes that California manufacturers will respond to the same incentives in the same way.

⁷ All are computed 3.5 percent butterfat and at test.

⁸ Weighted quota blend price is what an individual producer receives based on their quota (which receives the quota price) and non-quota holdings (which would receive the overbase price).

⁹ The following econometric relationships were found between milk not pooled and the monthly Class-uniform price difference in the Upper Midwest FMMO ('milk not pooled' includes only milk that is 'normally' pooled):

$$\text{Cl. II milk not pooled/Cl. II milk pooled} = 0.957161 - (0.59094 \times (\text{Uniform Price} - \text{Cl. II Price}))$$

$$\text{Cl. III milk not pooled/Cl. III milk pooled} = 0.260105 - (0.51657 \times (\text{Uniform Price} - \text{Cl. III Price}))$$

$$\text{Cl. IV milk not pooled/Cl. IV milk pooled} = 1.325558 - (0.62078 \times (\text{Uniform Price} - \text{Cl. IV Price}))$$

There is greater than 99.99 percent statistical confidence that there is a positive relationship between the price difference and the amount of milk pooled, for each Class. The 'R-squared' of the equations are 0.6515, 0.5344, and 0.3771 for the Class II, III, and IV equations, respectively.

The analysis used to evaluate the proposals is based on an annual model. Pooling decisions are made monthly based on Class-to-uniform price relationships. Therefore, the methodology developed took observed monthly pooling decisions, historical monthly variations, and annual prices to estimate how much milk of each Class is pooled and not pooled over the course of a year.

The analysis found that on average, approximately 32 percent of milk normally pooled per year was not pooled because of price. On a classified use basis, 44 percent of Class II, 26 percent of Class III, and 32 percent of Class IV milk normally pooled per year was not pooled because of price.

1. Impacts on Dairy Farmers

Results of the analysis for the Institute's proposal can be found in Tables B49-B64. To evaluate the impact of the Institute's proposal on dairy farmers in the ten FMMOs and California, statistical uniform blend prices at 3.5 BF (Table B49) and at test (Table B50) are considered. Also, the changes in the dairy product prices (Table B51), the all-milk prices (Table B52), milk production (Table B53), milk marketings (Table B54), and producer revenue (Table B55) in the 14 regions are considered.

The analysis forecasts that adoption of the Institute's proposal would, on average, increase annual CA producer revenue by \$70 million (Table B55). The proposal would also increase the CA all-milk price by \$0.10 per cwt (Table B52), and increase CA milk production (Table B53) and milk marketings (Table B54) by 60 million pounds, due to a slight increase of \$0.11 in the CA blend price at test (Table B50).

Given the volume of milk production in California (in excess of 20 percent of total U.S. production), changes in California milk production can be expected to have an impact on the rest of the country. At a national level, the U.S. all-milk price (Table B52) is predicted to increase by \$0.07 per cwt. Milk production (Table B53) increases by 450 million pounds in response to changes in the all-milk price, (Table B54) which increases U.S. producer revenue (Table B55) by \$230 million.

The impact varies largely by region. The largest increases in producer revenue are seen in the Upper Midwest (UM) region, followed by California and the Southwest. The FMMOs with the greatest decrease in producer revenue is the Northeast, followed by the Mideast, Arizona, and the Southeast.

2. Impacts on Fluid Milk Processors and Dairy Product Manufacturers

The analysis predicts that fluid milk processors and dairy product manufacturers in California and throughout the United States would be affected by adoption of the Institute's proposal.

California fluid milk processors and dairy product manufacturers that may fall subject to FMMO regulations as proposed by the Institute may experience different impacts depending on their use of milk. The analysis predicts that California Class I utilization increases by 865 million pounds because out-of-state milk and "exempt" quota milk is pooled.¹⁰ The analysis predicts that the California Class I price at 3.5 BF decreases by \$0.94 per cwt (Table B58) compared to the baseline because of the proposed default values included in the product price formulas that lower the component prices. The increase in CA Class I utilization (Table B60) causes an increase in the CA Class I revenue (Table B62) despite the decrease in the Class I price at test (Table B59).

¹⁰ Out-of-state milk and exempt quota milk is not currently pooled in California, and therefore its use value is not included in current California utilization data.

California Class II, III, and IV utilization decreases (Table B60) in part because handlers can elect to not pool manufacturing milk. The analysis predicts that utilization decreases by the following:

- CA Class II: 1.270 billion pounds
- CA Class III: 8.846 billion pounds
- CA Class IV: 8.090 billion pounds

The decrease in cheese production and the U.S. Class III utilization increases the cheddar cheese prices. The dry whey production decreases with declining cheese production and increases the dry whey price. The decreases in Class III utilization shifts more milk into Class II and IV utilization. The greater utilization in Class II and IV reflect increased butter and nonfat dry milk production. The increase in production lowers the butter and nonfat dry milk price, which then leads to decreases in Class II and Class IV prices at test (Table B59) in all regions.

Throughout the United States, dairy manufacturers are affected by the changes in dairy product prices and FMMO class prices. Nationally, Class I and III utilization decreases, while Class II and IV utilization increases (Table B61). This lowers FMMO butterfat and nonfat solids prices and raises protein and other solids prices (Table B56), which then impact FMMO Class Prices at 3.5 BF (Table B57). While the Class prices at 3.5 BF are useful for comparison, the prices at test are the minimum prices paid by fluid milk processors and dairy product manufactures. FMMO class prices at test (Table B59) vary by order. The analysis predicts decreases in the Class II and IV prices at test and increases in the Class III prices at test, across all FMMOs.

3. Effects on Consumer Retail Prices

This analysis cannot estimate the potential impacts of the Institute's proposal on retail prices, and thus consumers. In general, changes in all-milk and wholesale product prices are passed through to consumers, but how fast those changes occur is undetermined. This analysis assumes that any increases or decreases in raw milk costs to fluid processors or dairy product manufacturers would rapidly pass through wholesale and retail sales chains with little impact on margins.

4. International Trade Impacts

Because of the bulky and perishable nature of packaged fluid milk, most international trading of dairy products is in manufactured products. Decreases in the domestic national dairy product prices (Table B51) for butter and nonfat dry milk are projected to suppress imports into the United States (Table B63) and stimulate exports from the United States (Table B64) of those respective products.¹¹ The opposite is predicted for American cheese and other than American cheese where the results show increasing imports and decreasing exports of those products due to domestic price increases. Lastly, increasing national dry whey prices are expected to decrease dry whey exports.¹²

¹¹ Nonfat dry milk imports are not forecasted in the model because the U.S. imports a negligible amount.

¹² Dry whey imports are not forecasted in the model because the U.S. imports a negligible amount.

F. Summary

This analysis finds that throughout 2017-2024, the Cooperative proposal will increase the California blend prices at test, increasing the California all-milk price and California milk production, in turn increasing California producer revenues. The increase in California production causes an increase in U.S. milk production, which decreases dairy product prices in all current FMMOs and across the rest of the United States. This analysis also finds that the Ponderosa and CPHA proposals result in impacts to the dairy industry that are very similar to the Cooperatives' proposal.

This analysis finds that the Institute's proposal has mixed effects in California. Adoption of the proposal would lead to increases in California all milk price, California milk production, and California producer revenue. While the U.S. all milk price and milk production overall increase, impacts to individual orders vary.

IV. APPENDIX A: ABBREVIATIONS

AP: Appalachian
AMS: Agricultural Marketing Service
AZ: Arizona
CA: California
CDFA: California Department of Food and Agriculture
CE: Central
CPHA: California Producer Handler Association
CPPD: Class Producer Price Differential
FL: Florida
FMMO: Federal Milk Marketing Order
FW: Former Western
HIAK: Hawaii and Alaska
ME: Mideast
NE: Northeast
PPD: Producer Price Differential
SE: Southeast
SW: Southwest
UM: Upper Midwest
UW: Unregulated West
U.S.: United States

V. APPENDIX B: TABLES

TABLE B1: Statistical Uniform Prices at 3.5 BF Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.13	-0.13	-0.12	-0.13	-0.09
AP Statistical Uniform Price	\$/CWT	-0.09	-0.13	-0.13	-0.13	-0.13	-0.12	-0.15	-0.14	-0.13	-0.15	-0.09
FL Statistical Uniform Price	\$/CWT	-0.08	-0.10	-0.09	-0.08	-0.08	-0.07	-0.10	-0.10	-0.09	-0.10	-0.07
SE Statistical Uniform Price	\$/CWT	-0.07	-0.08	-0.06	-0.04	-0.04	-0.04	-0.06	-0.06	-0.06	-0.08	-0.04
UM Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.10	-0.10	-0.10	-0.12	-0.08
CE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.09
ME Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.08
PN Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
SW Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.08
AZ Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
CA Statistical Uniform Price	\$/CWT	0.92	0.88	0.89	0.91	0.94	0.97	1.01	1.03	0.94	0.88	1.03
CA Non-Quota Blend Price	\$/CWT	0.95	0.90	0.91	0.91	0.93	0.95	0.98	1.01	0.94	0.90	1.01
CA Quota Blend Price	\$/CWT	0.95	0.90	0.91	0.91	0.93	0.95	0.98	1.01	0.94	0.90	1.01

TABLE B2: Blend Prices at Test Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Blend Price	\$/CWT	-0.10	-0.13	-0.13	-0.12	-0.12	-0.12	-0.14	-0.14	-0.12	-0.14	-0.10
AP Blend Price	\$/CWT	-0.09	-0.14	-0.14	-0.14	-0.13	-0.13	-0.15	-0.15	-0.13	-0.15	-0.09
FL Blend Price	\$/CWT	-0.10	-0.18	-0.21	-0.21	-0.22	-0.24	-0.29	-0.31	-0.22	-0.31	-0.10
SE Blend Price	\$/CWT	-0.13	-0.22	-0.25	-0.26	-0.27	-0.28	-0.32	-0.34	-0.26	-0.34	-0.13
UM Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.09
CE Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.12	-0.12	-0.12	-0.13	-0.09
ME Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
PN Blend Price	\$/CWT	-0.10	-0.14	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.14	-0.10
SW Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.11	-0.11	-0.12	-0.12	-0.12	-0.13	-0.09
AZ Blend Price	\$/CWT	-0.05	-0.07	-0.07	-0.06	-0.05	-0.05	-0.06	-0.06	-0.06	-0.07	-0.05
CA Blend Price	\$/CWT	1.11	1.06	1.07	1.09	1.12	1.14	1.19	1.20	1.12	1.06	1.20
CA Non-Quota Blend Price	\$/CWT	1.03	0.98	1.00	1.01	1.05	1.07	1.12	1.14	1.05	0.98	1.14
CA Quota Blend Price	\$/CWT	1.03	0.98	1.00	1.01	1.05	1.07	1.12	1.14	1.05	0.98	1.14

TABLE B3: Dairy Product Prices Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Cheddar Cheese	\$/LBS	-0.0053	-0.0087	-0.0085	-0.0083	-0.0079	-0.0076	-0.0070	-0.0069	-0.0075	-0.0087	-0.0053
Butter	\$/LBS	-0.0229	-0.0289	-0.0277	-0.0239	-0.0235	-0.0243	-0.0260	-0.0265	-0.0255	-0.0289	-0.0229
Nonfat Dry Milk	\$/LBS	-0.0019	-0.0018	-0.0020	-0.0022	-0.0026	-0.0029	-0.0032	-0.0030	-0.0025	-0.0032	-0.0018
Dry Whey	\$/LBS	-0.0024	-0.0036	-0.0033	-0.0032	-0.0030	-0.0028	-0.0025	-0.0025	-0.0029	-0.0036	-0.0024

TABLE B4: All-Milk Price Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. All-Milk Price	\$/CWT	0.26	0.23	0.24	0.26	0.28	0.30	0.32	0.33	0.28	0.23	0.33
NE All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.11	-0.11	-0.11	-0.13	-0.13	-0.12	-0.13	-0.09
AP All-Milk Price	\$/CWT	-0.09	-0.14	-0.14	-0.13	-0.13	-0.13	-0.15	-0.15	-0.13	-0.15	-0.09
FL All-Milk Price	\$/CWT	-0.09	-0.17	-0.20	-0.21	-0.22	-0.23	-0.29	-0.31	-0.22	-0.31	-0.09
SE All-Milk Price	\$/CWT	-0.12	-0.21	-0.23	-0.24	-0.25	-0.26	-0.30	-0.32	-0.24	-0.32	-0.12
UM All-Milk Price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.08
CE All-Milk Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.09
ME All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
PN All-Milk Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
SW All-Milk Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.09
AZ All-Milk Price	\$/CWT	-0.05	-0.07	-0.07	-0.06	-0.05	-0.05	-0.06	-0.06	-0.06	-0.07	-0.05
CA All-Milk Price	\$/CWT	1.02	0.97	0.98	0.99	1.02	1.04	1.09	1.10	1.03	0.97	1.10
FW All-Milk Price	\$/CWT	0.99	0.94	0.96	0.97	0.99	1.02	1.06	1.06	1.00	0.94	1.06
UW All-Milk Price	\$/CWT	-0.07	-0.10	-0.10	-0.09	-0.09	-0.09	-0.09	-0.09	-0.09	-0.10	-0.07
HIAK All-Milk Price	\$/CWT	-0.02	-0.04	-0.05	-0.06	-0.07	-0.07	-0.07	-0.07	-0.06	-0.07	-0.02

TABLE B5: Milk Production Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Milk Production	Bil. LBS	0.41	0.60	0.60	0.61	0.62	0.62	0.62	0.60	0.58	0.41	0.62
NE Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Milk Production	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Milk Production	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.08	-0.15	0.00
CE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Milk Production	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.04	-0.03	-0.04	-0.02
PN Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Milk Production	Bil. LBS	0.00	-0.02	-0.05	-0.07	-0.10	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Milk Production	Bil. LBS	0.32	0.41	0.49	0.54	0.59	0.62	0.66	0.69	0.54	0.32	0.69
FW Milk Production	Bil. LBS	0.12	0.29	0.31	0.33	0.36	0.38	0.41	0.44	0.33	0.12	0.44
UW Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B6: Milk Marketings Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Marketings	Bil. LBS	0.41	0.60	0.60	0.61	0.62	0.62	0.62	0.60	0.58	0.41	0.62
NE Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Marketings	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Marketings	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.08	-0.15	0.00
CE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Marketings	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.03	-0.04	-0.02
PN Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Marketings	Bil. LBS	0.00	-0.02	-0.04	-0.07	-0.10	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Marketings	Bil. LBS	0.32	0.41	0.49	0.54	0.59	0.62	0.66	0.69	0.54	0.32	0.69
FW Marketings	Bil. LBS	0.12	0.29	0.31	0.33	0.36	0.38	0.41	0.44	0.33	0.12	0.44
UW Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B7: Producer Revenue Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Producer Revenue	Bil. \$	0.66	0.62	0.67	0.72	0.78	0.83	0.90	0.95	0.77	0.62	0.95
NE Producer Revenue	Bil. \$	-0.03	-0.04	-0.04	-0.04	-0.03	-0.03	-0.04	-0.04	-0.04	-0.04	-0.03
AP Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01
FL Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.01	-0.02	0.00
SE Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.03	-0.01	-0.03	0.00
UM Producer Revenue	Bil. \$	-0.04	-0.06	-0.06	-0.06	-0.07	-0.07	-0.07	-0.07	-0.06	-0.07	-0.04
CE Producer Revenue	Bil. \$	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01
ME Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.02
PN Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.01	-0.02	-0.01
SW Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.04	-0.04	-0.05	-0.05	-0.06	-0.04	-0.06	-0.02
AZ Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	-0.01	0.00	-0.01	0.00
CA Producer Revenue	Bil. \$	0.59	0.59	0.63	0.67	0.72	0.76	0.81	0.85	0.70	0.59	0.85
FW Producer Revenue	Bil. \$	0.21	0.24	0.26	0.28	0.30	0.33	0.36	0.39	0.30	0.21	0.39
UW Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B8: FMMO Component Prices Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Butterfat Price	\$/CWT	-0.03	-0.04	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.03
Nonfat Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Protein Price	\$/CWT	0.01	0.01	0.01	0.00	0.00	0.01	0.01	0.01	0.01	0.00	0.01
Other Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Somatic Cell Adjuster	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B9: FMMO Class Prices at 3.5 BF Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I Price	\$/CWT	-0.07	-0.12	-0.11	-0.11	-0.10	-0.10	-0.14	-0.14	-0.11	-0.14	-0.07
Class I Fat Price	\$/CWT	-0.03	-0.04	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.03
Class I Skim Price	\$/CWT	0.02	0.01	0.00	-0.01	0.00	0.00	-0.03	-0.03	0.00	-0.03	0.02
Class II Price	\$/CWT	-0.11	-0.14	-0.14	-0.12	-0.12	-0.13	-0.14	-0.14	-0.13	-0.14	-0.11
Class II Skim Price	\$/CWT	-0.02	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.03	-0.02	-0.03	-0.02
Class III Price	\$/CWT	-0.07	-0.12	-0.11	-0.11	-0.10	-0.10	-0.09	-0.09	-0.10	-0.12	-0.07
Class III Skim Price	\$/CWT	0.02	0.01	0.00	-0.01	0.00	0.00	0.02	0.02	0.01	-0.01	0.02
Class IV Price	\$/CWT	-0.11	-0.14	-0.14	-0.12	-0.12	-0.13	-0.14	-0.14	-0.13	-0.14	-0.11
Class IV Skim Price	\$/CWT	-0.02	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.03	-0.02	-0.03	-0.02

TABLE B10: CA to FMMO Class Prices at 3.5 BF Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.42	-0.47	-0.46	-0.46	-0.46	-0.45	-0.38	-0.41	-0.44	-0.47	-0.38
CA Class II price	\$/CWT	0.24	0.22	0.22	0.23	0.22	0.22	0.21	0.21	0.22	0.21	0.24
CA Class III price	\$/CWT	1.42	1.36	1.40	1.38	1.47	1.50	1.58	1.59	1.46	1.36	1.59
CA Class IV price	\$/CWT	0.01	-0.01	-0.01	0.00	-0.01	-0.01	-0.03	-0.03	-0.01	-0.03	0.01

TABLE B11: FMMO Class Prices at Test Changes under the Cooperative Proposal

Order 1:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
NE Class II price	\$/CWT	-0.18	-0.22	-0.21	-0.18	-0.19	-0.19	-0.21	-0.21	-0.20	-0.22	-0.18
NE Class III price	\$/CWT	-0.09	-0.14	-0.14	-0.13	-0.12	-0.12	-0.11	-0.12	-0.12	-0.14	-0.09
NE Class IV price	\$/CWT	-0.11	-0.13	-0.13	-0.11	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.11
Order 5:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AP Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
AP Class II price	\$/CWT	-0.28	-0.34	-0.33	-0.29	-0.29	-0.30	-0.32	-0.33	-0.31	-0.34	-0.28
AP Class III price	\$/CWT	-0.14	-0.20	-0.19	-0.18	-0.17	-0.17	-0.17	-0.17	-0.17	-0.20	-0.14
AP Class IV price	\$/CWT	-0.11	-0.30	-0.35	-0.43	-0.47	-0.42	-0.39	-0.35	-0.35	-0.47	-0.11
Order 6:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
FL Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.07	-0.06	-0.06	-0.09	-0.09	-0.06	-0.09	-0.03
FL Class II price	\$/CWT	-0.42	-0.53	-0.51	-0.44	-0.44	-0.46	-0.49	-0.50	-0.47	-0.53	-0.42
FL Class III price	\$/CWT	-0.16	-0.22	-0.21	-0.19	-0.19	-0.19	-0.19	-0.19	-0.19	-0.22	-0.16
FL Class IV price	\$/CWT	-0.39	-0.48	-0.47	-0.40	-0.40	-0.42	-0.45	-0.45	-0.43	-0.48	-0.39
Order 7:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SE Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.03
SE Class II price	\$/CWT	-0.29	-0.36	-0.35	-0.30	-0.30	-0.32	-0.34	-0.34	-0.33	-0.36	-0.29
SE Class III price	\$/CWT	-0.10	-0.15	-0.14	-0.14	-0.13	-0.13	-0.12	-0.12	-0.13	-0.15	-0.10
SE Class IV price	\$/CWT	-0.26	-0.33	-0.32	-0.27	-0.28	-0.29	-0.31	-0.31	-0.29	-0.33	-0.26
Order 30:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
UM Class I price	\$/CWT	-0.02	-0.04	-0.04	-0.05	-0.04	-0.04	-0.07	-0.07	-0.05	-0.07	-0.02
UM Class II price	\$/CWT	-0.27	-0.34	-0.32	-0.28	-0.28	-0.29	-0.32	-0.32	-0.30	-0.34	-0.27
UM Class III price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.11	-0.10	-0.09	-0.09	-0.10	-0.12	-0.08
UM Class IV price	\$/CWT	-0.34	-0.39	-0.35	-0.35	-0.28	-0.30	-0.33	-0.30	-0.33	-0.39	-0.28
Order 32:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CE Class I price	\$/CWT	-0.02	-0.05	-0.05	-0.06	-0.05	-0.05	-0.08	-0.08	-0.06	-0.08	-0.02
CE Class II price	\$/CWT	-0.22	-0.27	-0.27	-0.23	-0.23	-0.24	-0.26	-0.26	-0.25	-0.27	-0.22
CE Class III price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.10	-0.10	-0.11	-0.12	-0.08
CE Class IV price	\$/CWT	-0.14	-0.08	-0.07	-0.06	-0.07	-0.07	-0.08	-0.06	-0.08	-0.14	-0.06
Order 33:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
ME Class I price	\$/CWT	-0.03	-0.06	-0.05	-0.06	-0.05	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
ME Class II price	\$/CWT	-0.20	-0.25	-0.24	-0.21	-0.21	-0.22	-0.24	-0.24	-0.23	-0.25	-0.20
ME Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
ME Class IV price	\$/CWT	-0.03	-0.06	-0.07	-0.06	-0.07	-0.07	-0.08	-0.09	-0.07	-0.09	-0.03
Order 124:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
PN Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.05	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
PN Class II price	\$/CWT	-0.27	-0.33	-0.32	-0.28	-0.28	-0.29	-0.31	-0.31	-0.30	-0.33	-0.27
PN Class III price	\$/CWT	-0.08	-0.13	-0.13	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
PN Class IV price	\$/CWT	-0.12	-0.15	-0.15	-0.13	-0.13	-0.14	-0.15	-0.15	-0.14	-0.15	-0.12
Order 126:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SW Class I price	\$/CWT	-0.04	-0.07	-0.07	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.04
SW Class II price	\$/CWT	-0.26	-0.32	-0.31	-0.27	-0.27	-0.28	-0.30	-0.30	-0.29	-0.32	-0.26
SW Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
SW Class IV price	\$/CWT	-0.11	-0.12	-0.12	-0.10	-0.10	-0.11	-0.11	-0.10	-0.11	-0.12	-0.10

TABLE B11: FMMO Class Prices at Test Changes under the Cooperative Proposal

Order 131:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AZ Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
AZ Class II price	\$/CWT	-0.35	-0.44	-0.42	-0.37	-0.37	-0.38	-0.41	-0.42	-0.39	-0.44	-0.35
AZ Class III price	\$/CWT	-0.14	-0.20	-0.19	-0.18	-0.17	-0.17	-0.17	-0.17	-0.17	-0.20	-0.14
AZ Class IV price	\$/CWT	0.03	0.03	0.03	0.04	0.04	0.03	0.03	0.03	0.03	0.03	0.04
Order 50:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.80	-0.83	-0.82	-0.83	-0.83	-0.83	-0.76	-0.80	-0.81	-0.83	-0.76
CA Class II price	\$/CWT	0.86	0.79	0.77	0.79	0.78	0.76	0.73	0.72	0.78	0.72	0.86
CA Class III price	\$/CWT	1.79	1.73	1.78	1.76	1.85	1.88	1.97	1.99	1.84	1.73	1.99
CA Class IV price	\$/CWT	0.44	0.39	0.33	0.42	0.36	0.33	0.29	0.27	0.35	0.27	0.44

TABLE B12: CA Class Utilization Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	837	842	845	849	851	853	854	855	848	837	855
Class II	Mil. LBS	34	37	44	48	51	55	60	66	49	34	66
Class III	Mil. LBS	229	257	289	317	343	365	381	380	320	229	381
Class IV	Mil. LBS	223	287	321	342	359	372	391	420	339	223	420

TABLE B13: National Class Utilization Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	9	19	23	26	28	29	35	35	26	9	35
Class II	Mil. LBS	-17	-38	-60	-82	-86	-95	-112	-140	-79	-140	-17
Class III	Mil. LBS	251	384	383	393	385	388	382	394	370	251	394
Class IV	Mil. LBS	166	235	260	279	293	297	312	317	270	166	317

TABLE B14: FMMO Class I Revenue Changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I Revenue	Mil. \$	-2.3	-4.6	-4.5	-4.8	-4.4	-3.9	-6.5	-6.4	-4.7	-6.5	-2.3
AP Class I Revenue	Mil. \$	-0.9	-1.8	-1.7	-1.9	-1.7	-1.5	-2.5	-2.5	-1.8	-2.5	-0.9
FL Class I Revenue	Mil. \$	-0.7	-1.3	-1.3	-1.3	-1.2	-1.1	-1.8	-1.8	-1.3	-1.8	-0.7
SE Class I Revenue	Mil. \$	-1.1	-2.1	-2.0	-2.1	-2.0	-1.8	-2.9	-2.8	-2.1	-2.9	-1.1
UM Class I Revenue	Mil. \$	-0.5	-1.2	-1.2	-1.4	-1.3	-1.1	-2.1	-1.7	-1.3	-2.1	-0.5
CE Class I Revenue	Mil. \$	-0.9	-2.0	-1.9	-2.0	-1.8	-1.6	-2.9	-2.8	-2.0	-2.9	-0.9
ME Class I Revenue	Mil. \$	-1.3	-2.8	-2.7	-2.9	-2.6	-2.4	-4.0	-3.9	-2.8	-4.0	-1.3
PN Class I Revenue	Mil. \$	-0.5	-0.9	-0.9	-1.0	-0.9	-0.8	-1.4	-1.4	-1.0	-1.4	-0.5
SW Class I Revenue	Mil. \$	-1.3	-2.4	-2.3	-2.5	-2.3	-2.1	-3.4	-3.3	-2.5	-3.4	-1.3
AZ Class I Revenue	Mil. \$	-0.3	-0.5	-0.5	-0.6	-0.5	-0.5	-0.8	-0.7	-0.5	-0.8	-0.3
CA Class I Revenue	Mil. \$	77.1	75.5	76.3	76.8	78.5	80.2	86.3	86.4	79.6	75.5	86.4

TABLE B15: U.S. Import changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Imports	Mil. LBS	0.000	-0.001	-0.003	-0.004	-0.005	-0.005	-0.004	-0.002	-0.003	-0.005	0.000
Other than American Cheese Imports	Mil. LBS	-0.304	-0.680	-0.879	-1.019	-1.148	-1.217	-1.280	-1.450	-0.997	-1.450	-0.304
Butter Imports	Mil. LBS	-0.002	-0.001	-0.002	-0.010	-0.008	-0.008	-0.004	-0.001	-0.005	-0.010	-0.001

TABLE B16: U.S. Export changes under the Cooperative Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Exports	Mil. LBS	1.300	2.258	2.290	2.271	2.180	2.074	1.850	1.769	1.999	1.300	2.290
Other than American Cheese Exports	Mil. LBS	4.051	6.462	8.481	6.013	5.478	5.116	4.706	4.663	5.621	4.051	8.481
Dry Whey Exports	Mil. LBS	2.079	3.092	2.899	2.815	2.592	2.414	2.127	2.101	2.515	2.079	3.092
Butter Exports	Mil. LBS	5.977	8.907	8.804	8.699	8.249	8.333	8.342	7.754	8.133	5.977	8.907
Nonfat Dry Milk Exports	Mil. LBS	12.801	12.831	13.607	15.473	17.478	18.344	19.286	17.922	15.968	12.801	19.286

TABLE B17: Statistical Uniform Prices at 3.5 BF Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.13	-0.13	-0.12	-0.13	-0.09
AP Statistical Uniform Price	\$/CWT	-0.09	-0.13	-0.13	-0.13	-0.13	-0.12	-0.14	-0.14	-0.13	-0.14	-0.09
FL Statistical Uniform Price	\$/CWT	-0.08	-0.10	-0.09	-0.08	-0.08	-0.07	-0.10	-0.10	-0.09	-0.10	-0.07
SE Statistical Uniform Price	\$/CWT	-0.07	-0.08	-0.06	-0.04	-0.04	-0.04	-0.06	-0.06	-0.06	-0.08	-0.04
UM Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.10	-0.10	-0.10	-0.12	-0.08
CE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.09
ME Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.08
PN Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
SW Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.08
AZ Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.11	-0.10	-0.10	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
CA Statistical Uniform Price	\$/CWT	0.91	0.87	0.88	0.90	0.94	0.97	1.00	1.03	0.94	0.87	1.03
CA Non-Quota Blend Price	\$/CWT	0.95	0.90	0.91	0.91	0.93	0.95	0.98	1.01	0.94	0.90	1.01
CA Quota Blend Price	\$/CWT	0.95	0.90	0.91	0.91	0.93	0.95	0.98	1.01	0.94	0.90	1.01

TABLE B18: Blend Prices at Test Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Blend Price	\$/CWT	-0.10	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
AP Blend Price	\$/CWT	-0.09	-0.14	-0.14	-0.13	-0.13	-0.13	-0.15	-0.15	-0.13	-0.15	-0.09
FL Blend Price	\$/CWT	-0.10	-0.18	-0.21	-0.21	-0.22	-0.23	-0.29	-0.30	-0.22	-0.30	-0.10
SE Blend Price	\$/CWT	-0.13	-0.22	-0.24	-0.26	-0.27	-0.28	-0.32	-0.34	-0.25	-0.34	-0.13
UM Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.09
CE Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.12	-0.12	-0.12	-0.13	-0.09
ME Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
PN Blend Price	\$/CWT	-0.10	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
SW Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.11	-0.11	-0.12	-0.12	-0.12	-0.13	-0.09
AZ Blend Price	\$/CWT	-0.05	-0.07	-0.07	-0.06	-0.05	-0.05	-0.06	-0.06	-0.06	-0.07	-0.05
CA Blend Price	\$/CWT	1.10	1.05	1.07	1.08	1.12	1.14	1.18	1.19	1.12	1.05	1.19
CA Non-Quota Blend Price	\$/CWT	1.03	0.98	1.00	1.01	1.05	1.07	1.12	1.14	1.05	0.98	1.14
CA Quota Blend Price	\$/CWT	1.03	0.98	1.00	1.01	1.05	1.07	1.12	1.14	1.05	0.98	1.14

TABLE B19: Dairy Product Prices Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Cheddar Cheese	\$/LBS	-0.0053	-0.0087	-0.0085	-0.0083	-0.0079	-0.0076	-0.0070	-0.0070	-0.0075	-0.0087	-0.0053
Butter	\$/LBS	-0.0224	-0.0284	-0.0273	-0.0235	-0.0232	-0.0240	-0.0257	-0.0262	-0.0251	-0.0284	-0.0224
Nonfat Dry Milk	\$/LBS	-0.0019	-0.0018	-0.0021	-0.0022	-0.0026	-0.0029	-0.0033	-0.0030	-0.0025	-0.0033	-0.0018
Dry Whey	\$/LBS	-0.0024	-0.0036	-0.0033	-0.0032	-0.0030	-0.0028	-0.0025	-0.0025	-0.0029	-0.0036	-0.0024

TABLE B20: All-Milk Price Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. All-Milk Price	\$/CWT	0.26	0.23	0.24	0.26	0.28	0.30	0.32	0.33	0.28	0.23	0.33
NE All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.11	-0.11	-0.11	-0.13	-0.13	-0.12	-0.13	-0.09
AP All-Milk Price	\$/CWT	-0.09	-0.14	-0.13	-0.13	-0.13	-0.12	-0.15	-0.15	-0.13	-0.15	-0.09
FL All-Milk Price	\$/CWT	-0.09	-0.17	-0.20	-0.20	-0.22	-0.23	-0.29	-0.31	-0.21	-0.31	-0.09
SE All-Milk Price	\$/CWT	-0.12	-0.21	-0.23	-0.24	-0.25	-0.26	-0.30	-0.32	-0.24	-0.32	-0.12
UM All-Milk Price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.08
CE All-Milk Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.09
ME All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
PN All-Milk Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.09
SW All-Milk Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.08
AZ All-Milk Price	\$/CWT	-0.05	-0.07	-0.07	-0.06	-0.05	-0.05	-0.06	-0.06	-0.06	-0.07	-0.05
CA All-Milk Price	\$/CWT	1.01	0.96	0.98	0.99	1.02	1.04	1.08	1.09	1.02	0.96	1.09
FW All-Milk Price	\$/CWT	0.98	0.93	0.95	0.96	0.99	1.01	1.05	1.06	0.99	0.93	1.06
UW All-Milk Price	\$/CWT	-0.07	-0.10	-0.10	-0.09	-0.09	-0.09	-0.09	-0.09	-0.09	-0.10	-0.07
HIAK All-Milk Price	\$/CWT	-0.02	-0.04	-0.05	-0.06	-0.07	-0.07	-0.07	-0.07	-0.06	-0.07	-0.02

TABLE B21: Milk Production Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Milk Production	Bil. LBS	0.40	0.59	0.60	0.61	0.61	0.61	0.61	0.60	0.58	0.40	0.61
NE Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Milk Production	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Milk Production	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.08	-0.15	0.00
CE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Milk Production	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.03	-0.04	-0.02
PN Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Milk Production	Bil. LBS	0.00	-0.02	-0.05	-0.07	-0.10	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Milk Production	Bil. LBS	0.32	0.41	0.48	0.54	0.59	0.62	0.66	0.69	0.54	0.32	0.69
FW Milk Production	Bil. LBS	0.12	0.29	0.31	0.33	0.35	0.38	0.41	0.44	0.33	0.12	0.44
UW Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B22: Milk Marketings Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Marketings	Bil. LBS	0.40	0.59	0.60	0.61	0.61	0.61	0.61	0.60	0.58	0.40	0.61
NE Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Marketings	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Marketings	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.08	-0.15	0.00
CE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Marketings	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.04	-0.03	-0.04	-0.02
PN Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Marketings	Bil. LBS	0.00	-0.02	-0.04	-0.07	-0.09	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Marketings	Bil. LBS	0.32	0.41	0.48	0.54	0.58	0.62	0.66	0.69	0.54	0.32	0.69
FW Marketings	Bil. LBS	0.12	0.29	0.31	0.33	0.35	0.38	0.41	0.44	0.33	0.12	0.44
UW Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B23: Producer Revenue Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Producer Revenue	Bil. \$	0.66	0.62	0.66	0.72	0.78	0.83	0.89	0.95	0.76	0.62	0.95
NE Producer Revenue	Bil. \$	-0.03	-0.04	-0.04	-0.04	-0.03	-0.03	-0.04	-0.04	-0.04	-0.04	-0.03
AP Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01
FL Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.01	-0.02	0.00
SE Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.03	-0.01	-0.03	0.00
UM Producer Revenue	Bil. \$	-0.04	-0.06	-0.06	-0.06	-0.07	-0.07	-0.07	-0.07	-0.06	-0.07	-0.04
CE Producer Revenue	Bil. \$	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01
ME Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.02
PN Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.01	-0.02	-0.01
SW Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.04	-0.04	-0.05	-0.05	-0.06	-0.04	-0.06	-0.02
AZ Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	-0.01	0.00	-0.01	0.00
CA Producer Revenue	Bil. \$	0.58	0.59	0.63	0.67	0.71	0.75	0.81	0.85	0.70	0.58	0.85
FW Producer Revenue	Bil. \$	0.21	0.24	0.26	0.28	0.30	0.33	0.36	0.39	0.30	0.21	0.39
UW Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B24: FMMO Component Prices Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Butterfat Price	\$/CWT	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03
Nonfat Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Protein Price	\$/CWT	0.01	0.01	0.01	0.00	0.00	0.01	0.01	0.01	0.01	0.00	0.01
Other Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Somatic Cell Adjuster	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B25: FMMO Class Prices at 3.5 BF Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.14	-0.14	-0.11	-0.14	-0.08
Class I Fat Price	\$/CWT	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03
Class I Skim Price	\$/CWT	0.02	0.00	0.00	-0.01	-0.01	0.00	-0.03	-0.03	-0.01	-0.03	0.02
Class II Price	\$/CWT	-0.11	-0.14	-0.13	-0.12	-0.12	-0.13	-0.14	-0.14	-0.13	-0.14	-0.11
Class II Skim Price	\$/CWT	-0.02	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.03	-0.02	-0.03	-0.02
Class III Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.09	-0.09	-0.10	-0.12	-0.08
Class III Skim Price	\$/CWT	0.02	0.00	0.00	-0.01	-0.01	0.00	0.02	0.02	0.01	-0.01	0.02
Class IV Price	\$/CWT	-0.11	-0.14	-0.13	-0.12	-0.12	-0.13	-0.14	-0.14	-0.13	-0.14	-0.11
Class IV Skim Price	\$/CWT	-0.02	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.03	-0.02	-0.03	-0.02

TABLE B26: CA to FMMO Class Prices at 3.5 BF Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.42	-0.47	-0.46	-0.46	-0.46	-0.45	-0.38	-0.41	-0.44	-0.47	-0.38
CA Class II price	\$/CWT	0.24	0.22	0.22	0.23	0.23	0.22	0.21	0.21	0.22	0.21	0.24
CA Class III price	\$/CWT	1.42	1.36	1.40	1.38	1.47	1.50	1.58	1.59	1.46	1.36	1.59
CA Class IV price	\$/CWT	0.01	-0.01	-0.01	0.00	-0.01	-0.01	-0.03	-0.03	-0.01	-0.03	0.01

TABLE B27: FMMO Class Prices at Test Changes under the CPHA Proposal

Order 1:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
NE Class II price	\$/CWT	-0.17	-0.21	-0.21	-0.18	-0.18	-0.19	-0.21	-0.21	-0.20	-0.21	-0.17
NE Class III price	\$/CWT	-0.09	-0.14	-0.14	-0.13	-0.12	-0.12	-0.11	-0.11	-0.12	-0.14	-0.09
NE Class IV price	\$/CWT	-0.11	-0.13	-0.13	-0.11	-0.11	-0.12	-0.13	-0.13	-0.12	-0.13	-0.11
Order 5:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AP Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
AP Class II price	\$/CWT	-0.27	-0.34	-0.33	-0.29	-0.29	-0.30	-0.32	-0.32	-0.31	-0.34	-0.27
AP Class III price	\$/CWT	-0.14	-0.20	-0.19	-0.17	-0.17	-0.17	-0.17	-0.17	-0.17	-0.20	-0.14
AP Class IV price	\$/CWT	-0.11	-0.29	-0.35	-0.42	-0.46	-0.41	-0.38	-0.34	-0.35	-0.46	-0.11
Order 6:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
FL Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.03
FL Class II price	\$/CWT	-0.41	-0.52	-0.50	-0.43	-0.43	-0.45	-0.48	-0.49	-0.47	-0.52	-0.41
FL Class III price	\$/CWT	-0.16	-0.22	-0.21	-0.19	-0.19	-0.19	-0.18	-0.19	-0.19	-0.22	-0.16
FL Class IV price	\$/CWT	-0.38	-0.48	-0.46	-0.40	-0.40	-0.41	-0.44	-0.45	-0.43	-0.48	-0.38
Order 7:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SE Class I price	\$/CWT	-0.03	-0.07	-0.06	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.03
SE Class II price	\$/CWT	-0.29	-0.36	-0.34	-0.30	-0.30	-0.31	-0.34	-0.34	-0.32	-0.36	-0.29
SE Class III price	\$/CWT	-0.10	-0.15	-0.14	-0.14	-0.13	-0.13	-0.12	-0.12	-0.13	-0.15	-0.10
SE Class IV price	\$/CWT	-0.26	-0.32	-0.31	-0.27	-0.27	-0.28	-0.30	-0.31	-0.29	-0.32	-0.26
Order 30:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
UM Class I price	\$/CWT	-0.02	-0.05	-0.05	-0.05	-0.05	-0.04	-0.07	-0.07	-0.05	-0.07	-0.02
UM Class II price	\$/CWT	-0.26	-0.33	-0.32	-0.28	-0.28	-0.29	-0.31	-0.32	-0.30	-0.33	-0.26
UM Class III price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.11	-0.10	-0.09	-0.09	-0.10	-0.12	-0.08
UM Class IV price	\$/CWT	-0.33	-0.39	-0.34	-0.34	-0.27	-0.29	-0.32	-0.29	-0.32	-0.39	-0.27
Order 32:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CE Class I price	\$/CWT	-0.03	-0.06	-0.05	-0.06	-0.05	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
CE Class II price	\$/CWT	-0.22	-0.27	-0.26	-0.23	-0.23	-0.24	-0.26	-0.26	-0.25	-0.27	-0.22
CE Class III price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.10	-0.10	-0.11	-0.12	-0.08
CE Class IV price	\$/CWT	-0.14	-0.08	-0.07	-0.06	-0.07	-0.07	-0.08	-0.06	-0.08	-0.14	-0.06
Order 33:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
ME Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.05	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
ME Class II price	\$/CWT	-0.20	-0.25	-0.24	-0.21	-0.21	-0.22	-0.24	-0.24	-0.22	-0.25	-0.20
ME Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
ME Class IV price	\$/CWT	-0.03	-0.06	-0.07	-0.06	-0.07	-0.07	-0.08	-0.09	-0.07	-0.09	-0.03
Order 124:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
PN Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
PN Class II price	\$/CWT	-0.26	-0.33	-0.32	-0.27	-0.28	-0.29	-0.31	-0.31	-0.29	-0.33	-0.26
PN Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
PN Class IV price	\$/CWT	-0.12	-0.15	-0.14	-0.13	-0.13	-0.14	-0.15	-0.15	-0.14	-0.15	-0.12
Order 126:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SW Class I price	\$/CWT	-0.04	-0.07	-0.07	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.04
SW Class II price	\$/CWT	-0.25	-0.31	-0.30	-0.27	-0.27	-0.28	-0.30	-0.30	-0.28	-0.31	-0.25
SW Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
SW Class IV price	\$/CWT	-0.11	-0.12	-0.12	-0.10	-0.10	-0.10	-0.11	-0.10	-0.11	-0.12	-0.10

TABLE B27: FMMO Class Prices at Test Changes under the CPHA Proposal

Order 131:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AZ Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.09	-0.09	-0.06	-0.09	-0.03
AZ Class II price	\$/CWT	-0.35	-0.43	-0.42	-0.36	-0.36	-0.38	-0.41	-0.41	-0.39	-0.43	-0.35
AZ Class III price	\$/CWT	-0.14	-0.20	-0.19	-0.18	-0.17	-0.17	-0.17	-0.17	-0.17	-0.20	-0.14
AZ Class IV price	\$/CWT	0.03	0.03	0.03	0.04	0.04	0.03	0.03	0.03	0.03	0.03	0.04
Order 50:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.93	-0.95	-0.95	-0.95	-0.95	-0.96	-0.89	-0.93	-0.94	-0.96	-0.89
CA Class II price	\$/CWT	0.86	0.80	0.78	0.79	0.78	0.76	0.74	0.72	0.78	0.72	0.86
CA Class III price	\$/CWT	1.79	1.73	1.78	1.76	1.85	1.88	1.97	1.99	1.84	1.73	1.99
CA Class IV price	\$/CWT	0.44	0.39	0.33	0.42	0.36	0.33	0.29	0.27	0.35	0.27	0.44

TABLE B28: CA Class Utilization Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	593	597	601	604	607	609	610	611	604	593	611
Class II	Mil. LBS	34	37	43	47	50	54	59	65	49	34	65
Class III	Mil. LBS	225	254	286	314	340	362	379	378	317	225	379
Class IV	Mil. LBS	223	286	319	340	357	370	389	418	337	223	418

TABLE B29: National Class Utilization Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	10	19	23	27	28	29	35	35	26	10	35
Class II	Mil. LBS	-18	-38	-60	-82	-85	-94	-111	-138	-78	-138	-18
Class III	Mil. LBS	247	378	378	387	379	382	376	388	364	247	388
Class IV	Mil. LBS	165	234	259	279	292	297	312	316	269	165	316

TABLE B30: FMMO Class I Revenue Changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I Revenue	Mil. \$	-2.4	-4.7	-4.5	-4.9	-4.4	-4.0	-6.5	-6.3	-4.7	-6.5	-2.4
AP Class I Revenue	Mil. \$	-0.9	-1.8	-1.8	-1.9	-1.7	-1.6	-2.5	-2.5	-1.8	-2.5	-0.9
FL Class I Revenue	Mil. \$	-0.7	-1.3	-1.3	-1.3	-1.2	-1.1	-1.8	-1.8	-1.3	-1.8	-0.7
SE Class I Revenue	Mil. \$	-1.1	-2.1	-2.1	-2.2	-2.0	-1.8	-2.9	-2.8	-2.1	-2.9	-1.1
UM Class I Revenue	Mil. \$	-0.5	-1.2	-1.2	-1.4	-1.3	-1.1	-2.1	-1.7	-1.3	-2.1	-0.5
CE Class I Revenue	Mil. \$	-1.0	-2.0	-1.9	-2.1	-1.9	-1.7	-2.8	-2.8	-2.0	-2.8	-1.0
ME Class I Revenue	Mil. \$	-1.4	-2.9	-2.8	-3.0	-2.7	-2.4	-4.0	-3.9	-2.9	-4.0	-1.4
PN Class I Revenue	Mil. \$	-0.5	-1.0	-0.9	-1.0	-0.9	-0.8	-1.4	-1.4	-1.0	-1.4	-0.5
SW Class I Revenue	Mil. \$	-1.3	-2.4	-2.4	-2.6	-2.3	-2.2	-3.4	-3.3	-2.5	-3.4	-1.3
AZ Class I Revenue	Mil. \$	-0.3	-0.6	-0.5	-0.6	-0.5	-0.5	-0.7	-0.7	-0.5	-0.7	-0.3
CA Class I Revenue	Mil. \$	30.3	29.4	30.2	30.9	32.2	33.3	38.4	37.8	32.8	29.4	38.4

TABLE B31: U.S. Import changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Imports	Mil. LBS	0.000	-0.001	-0.003	-0.004	-0.005	-0.005	-0.004	-0.002	-0.003	-0.005	0.000
Other than American Cheese Imports	Mil. LBS	-0.308	-0.683	-0.882	-1.022	-1.151	-1.219	-1.284	-1.454	-1.000	-1.454	-0.308
Butter Imports	Mil. LBS	-0.002	-0.001	-0.002	-0.010	-0.008	-0.008	-0.004	-0.001	-0.004	-0.010	-0.001

TABLE B32: U.S. Export changes under the CPHA Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Exports	Mil. LBS	1.313	2.266	2.294	2.275	2.183	2.078	1.857	1.775	2.005	1.313	2.294
Other than American Cheese Exports	Mil. LBS	4.092	6.482	8.496	6.024	5.487	5.126	4.726	4.680	5.639	4.092	8.496
Dry Whey Exports	Mil. LBS	2.100	3.100	2.904	2.820	2.597	2.419	2.137	2.108	2.523	2.100	3.100
Butter Exports	Mil. LBS	5.849	8.741	8.654	8.556	8.127	8.216	8.228	7.654	8.003	5.849	8.741
Nonfat Dry Milk Exports	Mil. LBS	12.838	13.002	13.788	15.655	17.651	18.498	19.434	18.106	16.121	12.838	19.434

TABLE B33: Statistical Uniform Prices at 3.5 BF Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
AP Statistical Uniform Price	\$/CWT	-0.09	-0.13	-0.13	-0.13	-0.12	-0.12	-0.14	-0.14	-0.12	-0.14	-0.09
FL Statistical Uniform Price	\$/CWT	-0.08	-0.10	-0.09	-0.08	-0.08	-0.07	-0.10	-0.09	-0.09	-0.10	-0.07
SE Statistical Uniform Price	\$/CWT	-0.07	-0.08	-0.06	-0.04	-0.04	-0.04	-0.06	-0.06	-0.06	-0.08	-0.04
UM Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.10	-0.10	-0.10	-0.10	-0.10	-0.12	-0.08
CE Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.11	-0.11	-0.12	-0.09
ME Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.08
PN Statistical Uniform Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
SW Statistical Uniform Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.10	-0.11	-0.11	-0.11	-0.12	-0.08
AZ Statistical Uniform Price	\$/CWT	-0.08	-0.11	-0.11	-0.10	-0.10	-0.10	-0.11	-0.11	-0.11	-0.11	-0.08
CA Statistical Uniform Price	\$/CWT	0.90	0.86	0.88	0.90	0.93	0.96	1.00	1.02	0.93	0.86	1.02
CA Non-Quota Blend Price	\$/CWT	0.93	0.89	0.89	0.90	0.91	0.94	0.97	1.00	0.93	0.89	1.00
CA Quota Blend Price	\$/CWT	0.93	0.89	0.89	0.90	0.91	0.94	0.97	1.00	0.93	0.89	1.00

TABLE B34: Blend Prices at Test Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Blend Price	\$/CWT	-0.10	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
AP Blend Price	\$/CWT	-0.09	-0.14	-0.14	-0.13	-0.13	-0.13	-0.15	-0.15	-0.13	-0.15	-0.09
FL Blend Price	\$/CWT	-0.10	-0.18	-0.20	-0.20	-0.22	-0.23	-0.28	-0.29	-0.21	-0.29	-0.10
SE Blend Price	\$/CWT	-0.13	-0.21	-0.24	-0.25	-0.26	-0.27	-0.31	-0.32	-0.25	-0.32	-0.13
UM Blend Price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.09
CE Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.13	-0.09
ME Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.13	-0.13	-0.12	-0.13	-0.09
PN Blend Price	\$/CWT	-0.10	-0.13	-0.13	-0.12	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
SW Blend Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.12	-0.12	-0.11	-0.13	-0.09
AZ Blend Price	\$/CWT	-0.05	-0.07	-0.06	-0.05	-0.05	-0.05	-0.06	-0.05	-0.06	-0.07	-0.05
CA Blend Price	\$/CWT	1.10	1.04	1.06	1.08	1.11	1.13	1.18	1.19	1.11	1.04	1.19
CA Non-Quota Blend Price	\$/CWT	1.01	0.96	0.98	1.00	1.04	1.06	1.11	1.12	1.04	0.96	1.12
CA Quota Blend Price	\$/CWT	1.01	0.96	0.98	1.00	1.04	1.06	1.11	1.12	1.04	0.96	1.12

TABLE B35: Dairy Product Prices Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Cheddar Cheese	\$/LBS	-0.0056	-0.0089	-0.0087	-0.0084	-0.0080	-0.0077	-0.0071	-0.0070	-0.0077	-0.0089	-0.0056
Butter	\$/LBS	-0.0209	-0.0268	-0.0259	-0.0224	-0.0223	-0.0231	-0.0248	-0.0254	-0.0239	-0.0268	-0.0209
Nonfat Dry Milk	\$/LBS	-0.0017	-0.0017	-0.0019	-0.0020	-0.0025	-0.0027	-0.0031	-0.0029	-0.0023	-0.0031	-0.0017
Dry Whey	\$/LBS	-0.0026	-0.0036	-0.0034	-0.0032	-0.0030	-0.0028	-0.0025	-0.0025	-0.0030	-0.0036	-0.0025

TABLE B36: All-Milk Price Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. All-Milk Price	\$/CWT	0.26	0.23	0.24	0.26	0.28	0.30	0.32	0.33	0.28	0.23	0.33
NE All-Milk Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.09
AP All-Milk Price	\$/CWT	-0.09	-0.13	-0.13	-0.13	-0.12	-0.12	-0.14	-0.14	-0.13	-0.14	-0.09
FL All-Milk Price	\$/CWT	-0.10	-0.17	-0.20	-0.20	-0.21	-0.23	-0.28	-0.30	-0.21	-0.30	-0.10
SE All-Milk Price	\$/CWT	-0.12	-0.20	-0.23	-0.24	-0.25	-0.26	-0.29	-0.31	-0.24	-0.31	-0.12
UM All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.13	-0.09
CE All-Milk Price	\$/CWT	-0.09	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.11	-0.11	-0.12	-0.09
ME All-Milk Price	\$/CWT	-0.09	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.13	-0.12	-0.13	-0.09
PN All-Milk Price	\$/CWT	-0.09	-0.13	-0.12	-0.12	-0.11	-0.11	-0.12	-0.12	-0.12	-0.13	-0.09
SW All-Milk Price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.11	-0.11	-0.11	-0.12	-0.08
AZ All-Milk Price	\$/CWT	-0.05	-0.07	-0.06	-0.05	-0.05	-0.05	-0.06	-0.05	-0.06	-0.07	-0.05
CA All-Milk Price	\$/CWT	1.00	0.95	0.97	0.98	1.01	1.04	1.08	1.09	1.02	0.95	1.09
FW All-Milk Price	\$/CWT	0.98	0.93	0.95	0.96	0.99	1.01	1.05	1.06	0.99	0.93	1.06
UW All-Milk Price	\$/CWT	-0.07	-0.10	-0.09	-0.09	-0.09	-0.09	-0.09	-0.09	-0.09	-0.10	-0.07
HIAK All-Milk Price	\$/CWT	-0.02	-0.04	-0.05	-0.06	-0.07	-0.07	-0.07	-0.08	-0.06	-0.08	-0.02

TABLE B37: Milk Production Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Milk Production	Bil. LBS	0.40	0.59	0.60	0.61	0.61	0.61	0.61	0.60	0.58	0.40	0.61
NE Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Milk Production	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Milk Production	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.09	-0.15	0.00
CE Milk Production	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Milk Production	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.02
PN Milk Production	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Milk Production	Bil. LBS	0.00	-0.02	-0.05	-0.07	-0.09	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Milk Production	Bil. LBS	0.00	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Milk Production	Bil. LBS	0.32	0.41	0.48	0.54	0.58	0.62	0.66	0.69	0.54	0.32	0.69
FW Milk Production	Bil. LBS	0.12	0.29	0.30	0.33	0.35	0.38	0.41	0.44	0.33	0.12	0.44
UW Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B38: Milk Marketings Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Marketings	Bil. LBS	0.40	0.59	0.60	0.61	0.61	0.61	0.61	0.60	0.58	0.40	0.61
NE Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
AP Marketings	Bil. LBS	0.00	-0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.01	0.00
FL Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.01	-0.02	-0.02	-0.02	-0.01	-0.02	0.00
SE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.01	-0.02	-0.03	-0.05	-0.07	-0.02	-0.07	0.00
UM Marketings	Bil. LBS	0.00	-0.02	-0.06	-0.08	-0.10	-0.12	-0.14	-0.15	-0.08	-0.15	0.00
CE Marketings	Bil. LBS	0.00	0.00	-0.01	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	0.00
ME Marketings	Bil. LBS	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.02
PN Marketings	Bil. LBS	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
SW Marketings	Bil. LBS	0.00	-0.02	-0.04	-0.07	-0.09	-0.12	-0.14	-0.17	-0.08	-0.17	0.00
AZ Marketings	Bil. LBS	0.00	0.00	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	0.00
CA Marketings	Bil. LBS	0.32	0.41	0.48	0.54	0.58	0.62	0.65	0.68	0.53	0.32	0.68
FW Marketings	Bil. LBS	0.12	0.29	0.30	0.33	0.35	0.38	0.41	0.44	0.33	0.12	0.44
UW Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B39: Producer Revenue Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Producer Revenue	Bil. \$	0.65	0.62	0.66	0.71	0.78	0.83	0.90	0.95	0.76	0.62	0.95
NE Producer Revenue	Bil. \$	-0.03	-0.04	-0.04	-0.03	-0.03	-0.03	-0.04	-0.04	-0.03	-0.04	-0.03
AP Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01
FL Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.01	-0.02	0.00
SE Producer Revenue	Bil. \$	0.00	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.01	-0.02	0.00
UM Producer Revenue	Bil. \$	-0.04	-0.06	-0.06	-0.06	-0.07	-0.07	-0.07	-0.07	-0.06	-0.07	-0.04
CE Producer Revenue	Bil. \$	-0.01	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.02	-0.01
ME Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.02
PN Producer Revenue	Bil. \$	-0.01	-0.01	-0.01	-0.01	-0.01	-0.01	-0.02	-0.02	-0.01	-0.02	-0.01
SW Producer Revenue	Bil. \$	-0.02	-0.03	-0.03	-0.04	-0.04	-0.05	-0.05	-0.06	-0.04	-0.06	-0.02
AZ Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CA Producer Revenue	Bil. \$	0.58	0.59	0.63	0.66	0.71	0.75	0.81	0.85	0.70	0.58	0.85
FW Producer Revenue	Bil. \$	0.21	0.24	0.26	0.28	0.30	0.33	0.36	0.39	0.29	0.21	0.39
UW Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B40: FMMO Component Prices Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Butterfat Price	\$/CWT	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03
Nonfat Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Protein Price	\$/CWT	0.01	0.01	0.01	0.00	0.00	0.00	0.01	0.01	0.01	0.00	0.01
Other Solids Price	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Somatic Cell Adjuster	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B41: FMMO Class Prices at 3.5 BF Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.13	-0.13	-0.11	-0.13	-0.08
Class I Fat Price	\$/CWT	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03	-0.03
Class I Skim Price	\$/CWT	0.01	-0.01	0.00	-0.02	-0.01	0.00	-0.03	-0.03	-0.01	-0.03	0.01
Class II Price	\$/CWT	-0.10	-0.13	-0.13	-0.11	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
Class II Skim Price	\$/CWT	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	-0.01
Class III Price	\$/CWT	-0.08	-0.12	-0.11	-0.11	-0.10	-0.10	-0.09	-0.09	-0.10	-0.12	-0.08
Class III Skim Price	\$/CWT	0.01	-0.01	0.00	-0.02	-0.01	0.00	0.01	0.01	0.00	-0.02	0.01
Class IV Price	\$/CWT	-0.10	-0.13	-0.13	-0.11	-0.12	-0.12	-0.13	-0.13	-0.12	-0.13	-0.10
Class IV Skim Price	\$/CWT	-0.01	-0.01	-0.02	-0.02	-0.02	-0.02	-0.03	-0.03	-0.02	-0.03	-0.01

TABLE B42: CA to FMMO Class Prices at 3.5 BF Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.43	-0.47	-0.46	-0.46	-0.46	-0.45	-0.37	-0.40	-0.44	-0.47	-0.37
CA Class II price	\$/CWT	0.25	0.23	0.23	0.24	0.23	0.23	0.21	0.21	0.23	0.21	0.25
CA Class III price	\$/CWT	1.42	1.35	1.40	1.38	1.47	1.49	1.58	1.59	1.46	1.35	1.59
CA Class IV price	\$/CWT	0.02	0.00	0.00	0.01	0.00	-0.01	-0.02	-0.02	0.00	-0.02	0.02

TABLE B43: FMMO Class Prices at Test Changes under the Ponderosa Dairy Proposal

Order 1:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I price	\$/CWT	-0.04	-0.07	-0.06	-0.07	-0.06	-0.06	-0.08	-0.08	-0.06	-0.08	-0.04
NE Class II price	\$/CWT	-0.16	-0.20	-0.20	-0.17	-0.18	-0.18	-0.20	-0.20	-0.19	-0.20	-0.16
NE Class III price	\$/CWT	-0.10	-0.14	-0.14	-0.13	-0.12	-0.12	-0.12	-0.11	-0.12	-0.14	-0.10
NE Class IV price	\$/CWT	-0.10	-0.12	-0.12	-0.11	-0.11	-0.11	-0.12	-0.12	-0.11	-0.12	-0.10
Order 5:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AP Class I price	\$/CWT	-0.04	-0.07	-0.06	-0.07	-0.06	-0.06	-0.08	-0.08	-0.07	-0.08	-0.04
AP Class II price	\$/CWT	-0.25	-0.32	-0.31	-0.27	-0.27	-0.29	-0.31	-0.31	-0.29	-0.32	-0.25
AP Class III price	\$/CWT	-0.14	-0.19	-0.19	-0.17	-0.17	-0.16	-0.16	-0.16	-0.17	-0.19	-0.14
AP Class IV price	\$/CWT	-0.10	-0.28	-0.33	-0.40	-0.44	-0.39	-0.37	-0.33	-0.33	-0.44	-0.10
Order 6:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
FL Class I price	\$/CWT	-0.04	-0.07	-0.07	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.04
FL Class II price	\$/CWT	-0.38	-0.49	-0.47	-0.41	-0.42	-0.43	-0.47	-0.47	-0.44	-0.49	-0.38
FL Class III price	\$/CWT	-0.15	-0.21	-0.21	-0.19	-0.18	-0.18	-0.18	-0.18	-0.19	-0.21	-0.15
FL Class IV price	\$/CWT	-0.35	-0.45	-0.44	-0.38	-0.38	-0.40	-0.43	-0.44	-0.41	-0.45	-0.35
Order 7:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SE Class I price	\$/CWT	-0.04	-0.07	-0.07	-0.07	-0.06	-0.06	-0.09	-0.09	-0.07	-0.09	-0.04
SE Class II price	\$/CWT	-0.26	-0.33	-0.33	-0.29	-0.29	-0.30	-0.32	-0.33	-0.31	-0.33	-0.26
SE Class III price	\$/CWT	-0.10	-0.15	-0.14	-0.13	-0.13	-0.13	-0.12	-0.12	-0.13	-0.15	-0.10
SE Class IV price	\$/CWT	-0.24	-0.30	-0.29	-0.26	-0.26	-0.27	-0.29	-0.30	-0.28	-0.30	-0.24
Order 30:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
UM Class I price	\$/CWT	-0.03	-0.05	-0.05	-0.05	-0.05	-0.04	-0.07	-0.07	-0.05	-0.07	-0.03
UM Class II price	\$/CWT	-0.25	-0.31	-0.30	-0.27	-0.27	-0.28	-0.30	-0.31	-0.28	-0.31	-0.25
UM Class III price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.09	-0.10	-0.12	-0.08
UM Class IV price	\$/CWT	-0.30	-0.35	-0.31	-0.31	-0.25	-0.26	-0.29	-0.26	-0.29	-0.35	-0.25
Order 32:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CE Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
CE Class II price	\$/CWT	-0.20	-0.25	-0.25	-0.22	-0.22	-0.23	-0.25	-0.25	-0.23	-0.25	-0.20
CE Class III price	\$/CWT	-0.08	-0.12	-0.12	-0.11	-0.11	-0.11	-0.10	-0.10	-0.11	-0.12	-0.08
CE Class IV price	\$/CWT	-0.12	-0.07	-0.07	-0.06	-0.07	-0.07	-0.07	-0.06	-0.07	-0.12	-0.06
Order 33:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
ME Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
ME Class II price	\$/CWT	-0.18	-0.23	-0.23	-0.20	-0.20	-0.21	-0.23	-0.23	-0.21	-0.23	-0.18
ME Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
ME Class IV price	\$/CWT	-0.02	-0.05	-0.06	-0.05	-0.06	-0.07	-0.08	-0.08	-0.06	-0.08	-0.02
Order 124:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
PN Class I price	\$/CWT	-0.03	-0.06	-0.06	-0.06	-0.06	-0.05	-0.08	-0.08	-0.06	-0.08	-0.03
PN Class II price	\$/CWT	-0.24	-0.31	-0.30	-0.26	-0.26	-0.28	-0.30	-0.30	-0.28	-0.31	-0.24
PN Class III price	\$/CWT	-0.09	-0.13	-0.13	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.09
PN Class IV price	\$/CWT	-0.11	-0.14	-0.14	-0.12	-0.12	-0.13	-0.14	-0.14	-0.13	-0.14	-0.11
Order 126:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SW Class I price	\$/CWT	-0.04	-0.07	-0.07	-0.07	-0.07	-0.06	-0.09	-0.09	-0.07	-0.09	-0.04
SW Class II price	\$/CWT	-0.23	-0.30	-0.29	-0.25	-0.25	-0.27	-0.29	-0.29	-0.27	-0.30	-0.23
SW Class III price	\$/CWT	-0.08	-0.13	-0.12	-0.12	-0.11	-0.11	-0.10	-0.10	-0.11	-0.13	-0.08
SW Class IV price	\$/CWT	-0.10	-0.11	-0.11	-0.10	-0.10	-0.10	-0.10	-0.10	-0.10	-0.11	-0.10

TABLE B43: FMMO Class Prices at Test Changes under the Ponderosa Dairy Proposal

Order 131:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AZ Class I price	\$/CWT	-0.04	-0.07	-0.06	-0.07	-0.06	-0.06	-0.08	-0.08	-0.07	-0.08	-0.04
AZ Class II price	\$/CWT	-0.32	-0.41	-0.40	-0.35	-0.35	-0.36	-0.39	-0.40	-0.37	-0.41	-0.32
AZ Class III price	\$/CWT	-0.14	-0.19	-0.19	-0.17	-0.17	-0.17	-0.16	-0.17	-0.17	-0.19	-0.14
AZ Class IV price	\$/CWT	0.03	0.03	0.04	0.04	0.04	0.04	0.03	0.03	0.03	0.03	0.04
Order 50:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-1.15	-1.16	-1.15	-1.15	-1.16	-1.17	-1.10	-1.15	-1.15	-1.17	-1.10
CA Class II price	\$/CWT	0.88	0.81	0.79	0.81	0.79	0.77	0.75	0.73	0.79	0.73	0.88
CA Class III price	\$/CWT	1.79	1.73	1.77	1.76	1.84	1.88	1.97	1.99	1.84	1.73	1.99
CA Class IV price	\$/CWT	0.45	0.40	0.34	0.43	0.37	0.34	0.30	0.28	0.36	0.28	0.45

TABLE B44: CA Class Utilization Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	249	254	258	261	263	265	266	267	260	249	267
Class II	Mil. LBS	27	30	36	40	43	47	51	57	41	27	57
Class III	Mil. LBS	179	210	244	273	301	323	341	343	277	179	343
Class IV	Mil. LBS	186	246	278	297	313	326	344	371	295	186	371

TABLE B45: National Class Utilization Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	11	20	24	27	29	30	35	35	26	11	35
Class II	Mil. LBS	-14	-32	-51	-70	-73	-80	-96	-120	-67	-120	-14
Class III	Mil. LBS	260	388	385	392	384	386	381	392	371	260	392
Class IV	Mil. LBS	147	216	241	261	275	280	295	301	252	147	301

TABLE B46: FMMO Class I Revenue Changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I Revenue	Mil. \$	-2.9	-5.1	-4.9	-5.1	-4.6	-4.1	-6.2	-6.1	-4.9	-6.2	-2.9
AP Class I Revenue	Mil. \$	-1.1	-1.9	-1.9	-2.0	-1.8	-1.6	-2.4	-2.4	-1.9	-2.4	-1.1
FL Class I Revenue	Mil. \$	-0.8	-1.4	-1.4	-1.4	-1.3	-1.2	-1.7	-1.7	-1.4	-1.7	-0.8
SE Class I Revenue	Mil. \$	-1.3	-2.3	-2.2	-2.2	-2.1	-1.9	-2.7	-2.7	-2.2	-2.7	-1.3
UM Class I Revenue	Mil. \$	-0.7	-1.4	-1.4	-1.5	-1.4	-1.2	-2.0	-1.6	-1.4	-2.0	-0.7
CE Class I Revenue	Mil. \$	-1.2	-2.2	-2.1	-2.2	-1.9	-1.7	-2.7	-2.6	-2.1	-2.7	-1.2
ME Class I Revenue	Mil. \$	-1.7	-3.1	-3.0	-3.1	-2.8	-2.5	-3.8	-3.7	-3.0	-3.8	-1.7
PN Class I Revenue	Mil. \$	-0.6	-1.1	-1.0	-1.1	-1.0	-0.9	-1.3	-1.3	-1.0	-1.3	-0.6
SW Class I Revenue	Mil. \$	-1.5	-2.6	-2.5	-2.6	-2.4	-2.2	-3.2	-3.2	-2.5	-3.2	-1.5
AZ Class I Revenue	Mil. \$	-0.3	-0.6	-0.6	-0.6	-0.5	-0.5	-0.7	-0.6	-0.6	-0.7	-0.3
CA Class I Revenue	Mil. \$	-36.4	-36.3	-35.2	-34.4	-33.6	-33.3	-29.4	-31.2	-33.7	-36.4	-29.4

TABLE B47: U.S. Import changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Imports	Mil. LBS	0.000	-0.001	-0.003	-0.004	-0.005	-0.005	-0.004	-0.002	-0.003	-0.005	0.000
Other than American Cheese Imports	Mil. LBS	-0.324	-0.706	-0.904	-1.041	-1.167	-1.233	-1.300	-1.472	-1.018	-1.472	-0.324
Butter Imports	Mil. LBS	-0.002	-0.001	-0.001	-0.010	-0.007	-0.008	-0.004	-0.001	-0.004	-0.010	-0.001

TABLE B48: U.S. Export changes under the Ponderosa Dairy Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Exports	Mil. LBS	1.383	2.327	2.340	2.302	2.201	2.093	1.885	1.794	2.041	1.383	3.340
Other than American Cheese Exports	Mil. LBS	4.311	6.649	8.660	6.088	5.530	5.161	4.799	4.729	5.741	4.311	8.660
Dry Whey Exports	Mil. LBS	2.212	3.172	2.957	2.847	2.616	2.435	2.173	2.129	2.568	2.129	3.172
Butter Exports	Mil. LBS	5.432	8.212	8.189	8.150	7.792	7.901	7.923	7.405	7.625	5.432	8.212
Nonfat Dry Milk Exports	Mil. LBS	11.138	11.859	12.745	14.553	16.495	17.332	18.262	17.073	14.932	11.138	18.262

TABLE B49: Statistical Uniform Prices at 3.5 BF Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Statistical Uniform Price	\$/CWT	0.15	0.11	0.01	-0.04	-0.12	-0.15	-0.21	-0.23	-0.06	-0.23	0.15
AP Statistical Uniform Price	\$/CWT	0.25	0.20	0.09	0.01	-0.08	-0.12	-0.21	-0.23	-0.01	-0.23	0.25
FL Statistical Uniform Price	\$/CWT	0.35	0.28	0.19	0.16	0.11	0.07	-0.02	-0.06	0.14	-0.06	0.35
SE Statistical Uniform Price	\$/CWT	0.22	0.17	0.11	0.11	0.08	0.07	0.02	0.00	0.10	0.00	0.22
UM Statistical Uniform Price	\$/CWT	0.43	0.39	0.31	0.25	0.21	0.19	0.18	0.14	0.26	0.14	0.43
CE Statistical Uniform Price	\$/CWT	0.24	0.20	0.10	0.04	-0.04	-0.06	-0.11	-0.13	0.03	-0.13	0.24
ME Statistical Uniform Price	\$/CWT	0.17	0.14	0.04	-0.02	-0.11	-0.14	-0.20	-0.23	-0.05	-0.23	0.17
PN Statistical Uniform Price	\$/CWT	0.18	0.14	0.04	-0.02	-0.09	-0.12	-0.17	-0.20	-0.03	-0.20	0.18
SW Statistical Uniform Price	\$/CWT	0.29	0.25	0.15	0.10	0.05	0.02	-0.02	-0.05	0.10	-0.05	0.29
AZ Statistical Uniform Price	\$/CWT	0.06	0.01	-0.10	-0.17	-0.27	-0.31	-0.38	-0.43	-0.20	-0.43	0.06
CA Statistical Uniform Price	\$/CWT	0.11	0.07	-0.02	-0.07	-0.11	-0.10	-0.09	-0.09	-0.04	-0.11	0.11
CA Non-Quota Blend Price	\$/CWT	-0.04	-0.08	-0.17	-0.21	-0.25	-0.24	-0.23	-0.22	-0.18	-0.25	-0.04
CA Quota Blend Price	\$/CWT	-0.04	-0.08	-0.17	-0.21	-0.25	-0.24	-0.23	-0.22	-0.18	-0.25	-0.04

TABLE B50: Blend Prices at Test Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Blend Price	\$/CWT	0.15	0.11	0.00	-0.05	-0.14	-0.17	-0.23	-0.26	-0.07	-0.26	0.15
AP Blend Price	\$/CWT	0.23	0.18	0.06	-0.02	-0.11	-0.15	-0.24	-0.27	-0.04	-0.27	0.23
FL Blend Price	\$/CWT	0.41	0.33	0.15	0.07	-0.09	-0.18	-0.37	-0.44	-0.01	-0.44	0.41
SE Blend Price	\$/CWT	0.33	0.21	-0.03	-0.20	-0.37	-0.48	-0.66	-0.75	-0.24	-0.75	0.33
UM Blend Price	\$/CWT	0.44	0.39	0.30	0.24	0.19	0.17	0.16	0.11	0.25	0.11	0.44
CE Blend Price	\$/CWT	0.25	0.21	0.10	0.03	-0.05	-0.08	-0.13	-0.16	0.02	-0.16	0.25
ME Blend Price	\$/CWT	0.18	0.14	0.03	-0.03	-0.12	-0.15	-0.22	-0.25	-0.05	-0.25	0.18
PN Blend Price	\$/CWT	0.19	0.15	0.04	-0.02	-0.10	-0.13	-0.18	-0.22	-0.03	-0.22	0.19
SW Blend Price	\$/CWT	0.31	0.26	0.16	0.10	0.04	0.02	-0.02	-0.06	0.10	-0.06	0.31
AZ Blend Price	\$/CWT	0.07	0.03	-0.09	-0.15	-0.25	-0.29	-0.36	-0.40	-0.18	-0.40	0.07
CA Blend Price	\$/CWT	0.28	0.23	0.14	0.08	0.03	0.04	0.06	0.05	0.11	0.03	0.28
CA Non-Quota Blend Price	\$/CWT	0.14	0.09	0.00	-0.05	-0.10	-0.09	-0.07	-0.07	-0.02	-0.10	0.14
CA Quota Blend Price	\$/CWT	0.14	0.09	0.00	-0.05	-0.10	-0.09	-0.07	-0.07	-0.02	-0.10	0.14

TABLE B51: Dairy Product Prices Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Cheddar Cheese	\$/LBS	0.0422	0.0413	0.0354	0.0311	0.0304	0.0291	0.0299	0.0264	0.0332	0.0264	0.0422
Butter	\$/LBS	-0.0429	-0.0577	-0.0785	-0.0868	-0.1084	-0.1126	-0.1205	-0.1225	-0.0912	-0.1225	-0.0429
Nonfat Dry Milk	\$/LBS	-0.0156	-0.0129	-0.0180	-0.0210	-0.0278	-0.0296	-0.0332	-0.0337	-0.0240	-0.0337	-0.0129
Dry Whey	\$/LBS	0.0190	0.0154	0.0133	0.0116	0.0115	0.0106	0.0108	0.0090	0.0127	0.0090	0.0190

TABLE B52: All-Milk Price Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. All-Milk Price	\$/CWT	0.26	0.22	0.12	0.06	0.00	-0.02	-0.04	-0.06	0.07	-0.06	0.26
NE All-Milk Price	\$/CWT	0.14	0.10	0.00	-0.05	-0.13	-0.16	-0.22	-0.24	-0.07	-0.24	0.14
AP All-Milk Price	\$/CWT	0.22	0.18	0.06	-0.02	-0.11	-0.14	-0.24	-0.26	-0.04	-0.26	0.22
FL All-Milk Price	\$/CWT	0.40	0.32	0.15	0.07	-0.09	-0.18	-0.37	-0.44	-0.02	-0.44	0.40
SE All-Milk Price	\$/CWT	0.32	0.20	-0.03	-0.19	-0.36	-0.46	-0.63	-0.71	-0.23	-0.71	0.32
UM All-Milk Price	\$/CWT	0.43	0.38	0.29	0.23	0.19	0.17	0.15	0.11	0.24	0.11	0.43
CE All-Milk Price	\$/CWT	0.23	0.20	0.09	0.03	-0.05	-0.07	-0.12	-0.15	0.02	-0.15	0.23
ME All-Milk Price	\$/CWT	0.18	0.14	0.03	-0.03	-0.12	-0.15	-0.22	-0.25	-0.05	-0.25	0.18
PN All-Milk Price	\$/CWT	0.19	0.14	0.03	-0.02	-0.10	-0.13	-0.18	-0.21	-0.03	-0.21	0.19
SW All-Milk Price	\$/CWT	0.29	0.24	0.15	0.10	0.04	0.01	-0.02	-0.06	0.09	-0.06	0.29
AZ All-Milk Price	\$/CWT	0.07	0.03	-0.09	-0.15	-0.25	-0.29	-0.35	-0.39	-0.18	-0.39	0.07
CA All-Milk Price	\$/CWT	0.26	0.21	0.12	0.07	0.03	0.03	0.05	0.05	0.10	0.03	0.26
FW All-Milk Price	\$/CWT	0.25	0.20	0.11	0.06	0.01	0.02	0.04	0.03	0.09	0.01	0.25
UW All-Milk Price	\$/CWT	0.19	0.16	0.07	0.03	-0.04	-0.06	-0.10	-0.12	0.02	-0.12	0.19
HIAK All-Milk Price	\$/CWT	0.12	0.21	0.25	0.28	0.29	0.30	0.30	0.30	0.26	0.12	0.30

TABLE B53: Milk Production Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Milk Production	Bil. LBS	0.19	0.44	0.53	0.54	0.52	0.49	0.46	0.42	0.45	0.19	0.54
NE Milk Production	Bil. LBS	0.00	0.01	0.01	0.01	0.00	-0.01	-0.02	-0.02	0.00	-0.02	0.01
AP Milk Production	Bil. LBS	0.01	0.01	0.00	0.00	0.00	0.00	-0.01	-0.01	0.00	-0.01	0.01
FL Milk Production	Bil. LBS	0.00	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.01	0.00	0.01
SE Milk Production	Bil. LBS	0.00	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.01
UM Milk Production	Bil. LBS	0.00	0.12	0.20	0.25	0.29	0.31	0.32	0.33	0.23	0.00	0.33
CE Milk Production	Bil. LBS	0.00	0.01	0.02	0.02	0.02	0.02	0.02	0.01	0.02	0.00	0.02
ME Milk Production	Bil. LBS	0.04	0.04	0.01	-0.01	-0.03	-0.04	-0.06	-0.07	-0.01	-0.07	0.04
PN Milk Production	Bil. LBS	0.01	0.01	0.01	0.00	0.00	-0.01	-0.01	-0.01	0.00	-0.01	0.01
SW Milk Production	Bil. LBS	0.01	0.06	0.11	0.14	0.16	0.17	0.18	0.17	0.13	0.01	0.18
AZ Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	-0.01	-0.02	-0.03	-0.04	-0.01	-0.04	0.00
CA Milk Production	Bil. LBS	0.08	0.10	0.08	0.06	0.04	0.03	0.04	0.03	0.06	0.03	0.10
FW Milk Production	Bil. LBS	0.03	0.07	0.05	0.03	0.02	0.01	0.01	0.01	0.03	0.01	0.07
UW Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Milk Production	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B54: Milk Marketings Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Marketings	Bil. LBS	0.19	0.44	0.53	0.54	0.52	0.49	0.46	0.42	0.45	0.19	0.54
NE Marketings	Bil. LBS	0.00	0.01	0.01	0.01	0.00	-0.01	-0.02	-0.02	0.00	-0.02	0.01
AP Marketings	Bil. LBS	0.01	0.01	0.00	0.00	0.00	0.00	-0.01	-0.01	0.00	-0.01	0.01
FL Marketings	Bil. LBS	0.00	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.01	0.00	0.01
SE Marketings	Bil. LBS	0.00	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.01
UM Marketings	Bil. LBS	0.00	0.12	0.20	0.25	0.29	0.31	0.32	0.33	0.23	0.00	0.33
CE Marketings	Bil. LBS	0.00	0.01	0.02	0.02	0.02	0.02	0.02	0.01	0.02	0.00	0.02
ME Marketings	Bil. LBS	0.04	0.04	0.01	-0.01	-0.03	-0.04	-0.06	-0.07	-0.01	-0.07	0.04
PN Marketings	Bil. LBS	0.01	0.01	0.01	0.00	0.00	-0.01	-0.01	-0.01	0.00	-0.01	0.01
SW Marketings	Bil. LBS	0.01	0.06	0.11	0.14	0.16	0.17	0.18	0.17	0.13	0.01	0.18
AZ Marketings	Bil. LBS	0.00	0.00	0.00	0.00	-0.01	-0.02	-0.03	-0.04	-0.01	-0.04	0.00
CA Marketings	Bil. LBS	0.08	0.10	0.08	0.06	0.04	0.03	0.04	0.03	0.06	0.03	0.10
FW Marketings	Bil. LBS	0.03	0.07	0.05	0.03	0.02	0.01	0.01	0.01	0.03	0.01	0.07
UW Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Marketings	Bil. LBS	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B55: Producer Revenue Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
U.S. Producer Revenue	Bil. \$	0.61	0.57	0.37	0.25	0.10	0.05	-0.01	-0.08	0.23	-0.08	0.61
NE Producer Revenue	Bil. \$	0.04	0.03	0.00	-0.01	-0.04	-0.05	-0.06	-0.07	-0.02	-0.07	0.04
AP Producer Revenue	Bil. \$	0.01	0.01	0.00	0.00	-0.01	-0.01	-0.01	-0.01	0.00	-0.01	0.01
FL Producer Revenue	Bil. \$	0.01	0.01	0.01	0.01	0.00	0.00	-0.01	-0.01	0.00	-0.01	0.01
SE Producer Revenue	Bil. \$	0.01	0.01	0.00	0.00	-0.01	-0.01	-0.02	-0.02	-0.01	-0.02	0.01
UM Producer Revenue	Bil. \$	0.18	0.18	0.16	0.15	0.13	0.13	0.12	0.11	0.15	0.11	0.18
CE Producer Revenue	Bil. \$	0.04	0.03	0.02	0.01	0.00	-0.01	-0.02	-0.02	0.01	-0.02	0.04
ME Producer Revenue	Bil. \$	0.04	0.03	0.01	-0.01	-0.03	-0.04	-0.05	-0.06	-0.01	-0.06	0.04
PN Producer Revenue	Bil. \$	0.02	0.02	0.00	0.00	-0.01	-0.01	-0.02	-0.02	0.00	-0.02	0.02
SW Producer Revenue	Bil. \$	0.06	0.06	0.05	0.05	0.04	0.04	0.03	0.02	0.04	0.02	0.06
AZ Producer Revenue	Bil. \$	0.00	0.00	0.00	-0.01	-0.01	-0.02	-0.02	-0.03	-0.01	-0.03	0.00
CA Producer Revenue	Bil. \$	0.15	0.13	0.08	0.05	0.02	0.03	0.04	0.04	0.07	0.02	0.15
FW Producer Revenue	Bil. \$	0.05	0.05	0.03	0.02	0.01	0.01	0.01	0.01	0.02	0.01	0.05
UW Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HIAK Producer Revenue	Bil. \$	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B56: FMMO Component Prices Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Butterfat Price	\$/CWT	-0.05	-0.07	-0.10	-0.11	-0.13	-0.14	-0.15	-0.15	-0.11	-0.15	-0.05
Nonfat Solids Price	\$/CWT	-0.02	-0.01	-0.02	-0.02	-0.03	-0.03	-0.03	-0.03	-0.02	-0.03	-0.01
Protein Price	\$/CWT	0.19	0.21	0.21	0.21	0.24	0.24	0.25	0.24	0.22	0.19	0.25
Other Solids Price	\$/CWT	0.02	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02
Somatic Cell Adjuster	\$/CWT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

TABLE B57: FMMO Class Prices at 3.5 BF Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I Price	\$/CWT	0.50	0.46	0.39	0.33	0.31	0.30	0.19	0.17	0.33	0.17	0.50
Class I Fat Price	\$/CWT	-0.05	-0.07	-0.10	-0.11	-0.13	-0.14	-0.15	-0.15	-0.11	-0.15	-0.05
Class I Skim Price	\$/CWT	0.71	0.73	0.74	0.72	0.80	0.80	0.73	0.72	0.74	0.71	0.80
Class II Price	\$/CWT	-0.32	-0.36	-0.49	-0.55	-0.70	-0.73	-0.80	-0.81	-0.59	-0.81	-0.32
Class II Skim Price	\$/CWT	-0.14	-0.12	-0.16	-0.19	-0.25	-0.26	-0.30	-0.30	-0.21	-0.30	-0.12
Class III Price	\$/CWT	0.50	0.46	0.39	0.33	0.31	0.30	0.30	0.26	0.36	0.26	0.50
Class III Skim Price	\$/CWT	0.71	0.73	0.74	0.72	0.80	0.80	0.84	0.80	0.77	0.71	0.84
Class IV Price	\$/CWT	-0.32	-0.36	-0.49	-0.55	-0.70	-0.73	-0.80	-0.81	-0.59	-0.81	-0.32
Class IV Skim Price	\$/CWT	-0.14	-0.12	-0.16	-0.19	-0.25	-0.26	-0.30	-0.30	-0.21	-0.30	-0.12

TABLE B58: CA to FMMO Class Prices at 3.5 BF Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-0.79	-0.83	-0.91	-0.97	-0.98	-1.00	-1.00	-1.04	-0.94	-1.04	-0.79
CA Class II price	\$/CWT	-0.55	-0.59	-0.72	-0.79	-0.94	-0.97	-1.04	-1.05	-0.83	-1.05	-0.55
CA Class III price	\$/CWT	1.05	0.99	0.95	0.87	0.94	0.94	1.03	0.99	0.97	0.87	1.05
CA Class IV price	\$/CWT	-0.78	-0.82	-0.95	-1.02	-1.17	-1.20	-1.27	-1.29	-1.06	-1.29	-0.78

TABLE B59: FMMO Class Prices at Test Changes under the Dairy Institute Proposal

Order 1:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I price	\$/CWT	0.59	0.59	0.55	0.51	0.54	0.53	0.44	0.42	0.52	0.42	0.59
NE Class II price	\$/CWT	-0.43	-0.51	-0.70	-0.78	-0.99	-1.04	-1.12	-1.14	-0.84	-1.14	-0.43
NE Class III price	\$/CWT	0.48	0.43	0.33	0.27	0.24	0.21	0.21	0.16	0.29	0.16	0.48
NE Class IV price	\$/CWT	-0.33	-0.36	-0.50	-0.59	-0.74	-0.77	-0.83	-0.83	-0.62	-0.83	-0.33
Order 5:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AP Class I price	\$/CWT	0.59	0.59	0.55	0.51	0.54	0.52	0.43	0.42	0.52	0.42	0.59
AP Class II price	\$/CWT	-0.62	-0.77	-1.05	-1.17	-1.47	-1.53	-1.66	-1.68	-1.24	-1.68	-0.62
AP Class III price	\$/CWT	0.36	0.29	0.15	0.07	-0.01	-0.04	-0.06	-0.11	0.08	-0.11	0.36
AP Class IV price	\$/CWT	-0.46	-0.65	-1.13	-1.58	-2.18	-2.26	-2.47	-2.44	-1.65	-2.47	-0.46
Order 6:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
FL Class I price	\$/CWT	0.59	0.58	0.54	0.50	0.53	0.51	0.42	0.41	0.51	0.41	0.59
FL Class II price	\$/CWT	-0.89	-1.13	-1.55	-1.72	-2.16	-2.25	-2.42	-2.46	-1.82	-2.46	-0.89
FL Class III price	\$/CWT	0.33	0.24	0.09	0.00	-0.09	-0.13	-0.15	-0.20	0.01	-0.20	0.33
FL Class IV price	\$/CWT	-0.82	-1.04	-1.42	-1.57	-1.98	-2.06	-2.22	-2.25	-1.67	-2.25	-0.82
Order 7:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SE Class I price	\$/CWT	0.59	0.58	0.54	0.50	0.52	0.51	0.42	0.41	0.51	0.41	0.59
SE Class II price	\$/CWT	-0.65	-0.80	-1.10	-1.22	-1.54	-1.60	-1.73	-1.76	-1.30	-1.76	-0.65
SE Class III price	\$/CWT	0.45	0.39	0.29	0.23	0.19	0.16	0.16	0.11	0.25	0.11	0.45
SE Class IV price	\$/CWT	-0.59	-0.73	-0.99	-1.11	-1.39	-1.46	-1.57	-1.59	-1.18	-1.59	-0.59
Order 30:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
UM Class I price	\$/CWT	0.62	0.62	0.60	0.56	0.60	0.59	0.51	0.49	0.57	0.49	0.62
UM Class II price	\$/CWT	-0.60	-0.75	-1.02	-1.14	-1.43	-1.49	-1.61	-1.64	-1.21	-1.64	-0.60
UM Class III price	\$/CWT	0.52	0.48	0.40	0.34	0.33	0.31	0.32	0.27	0.37	0.27	0.52
UM Class IV price	\$/CWT	-1.18	-1.55	-1.92	-2.93	-2.81	-3.23	-3.66	-3.02	-2.54	-3.66	-1.18
Order 32:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CE Class I price	\$/CWT	0.61	0.60	0.57	0.53	0.56	0.55	0.46	0.45	0.54	0.45	0.61
CE Class II price	\$/CWT	-0.51	-0.63	-0.85	-0.95	-1.20	-1.26	-1.36	-1.38	-1.02	-1.38	-0.51
CE Class III price	\$/CWT	0.51	0.47	0.39	0.34	0.32	0.30	0.30	0.26	0.36	0.26	0.51
CE Class IV price	\$/CWT	-0.32	-0.23	-0.33	-0.32	-0.46	-0.40	-0.39	-0.32	-0.35	-0.46	-0.23
Order 33:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
ME Class I price	\$/CWT	0.60	0.60	0.56	0.53	0.56	0.55	0.46	0.44	0.54	0.44	0.60
ME Class II price	\$/CWT	-0.48	-0.58	-0.79	-0.88	-1.11	-1.16	-1.26	-1.28	-0.94	-1.28	-0.48
ME Class III price	\$/CWT	0.51	0.47	0.38	0.32	0.30	0.28	0.28	0.24	0.35	0.24	0.51
ME Class IV price	\$/CWT	-0.35	-0.32	-0.44	-0.50	-0.62	-0.64	-0.70	-0.70	-0.53	-0.70	-0.32
Order 124:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
PN Class I price	\$/CWT	0.60	0.60	0.56	0.52	0.55	0.54	0.45	0.44	0.53	0.44	0.60
PN Class II price	\$/CWT	-0.60	-0.74	-1.01	-1.12	-1.42	-1.48	-1.59	-1.62	-1.20	-1.62	-0.60
PN Class III price	\$/CWT	0.53	0.49	0.40	0.34	0.32	0.30	0.31	0.26	0.37	0.26	0.53
PN Class IV price	\$/CWT	-0.29	-0.34	-0.48	-0.55	-0.71	-0.74	-0.81	-0.82	-0.59	-0.82	-0.29
Order 126:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
SW Class I price	\$/CWT	0.58	0.57	0.53	0.49	0.51	0.50	0.40	0.39	0.50	0.39	0.58
SW Class II price	\$/CWT	-0.58	-0.71	-0.97	-1.09	-1.37	-1.43	-1.54	-1.57	-1.16	-1.57	-0.58
SW Class III price	\$/CWT	0.51	0.47	0.39	0.33	0.31	0.29	0.29	0.25	0.36	0.25	0.51
SW Class IV price	\$/CWT	-0.38	-0.41	-0.55	-0.64	-0.80	-0.84	-0.88	-0.89	-0.67	-0.89	-0.38

TABLE B59: FMMO Class Prices at Test Changes under the Dairy Institute Proposal

Order 131:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
AZ Class I price	\$/CWT	0.59	0.59	0.55	0.51	0.54	0.53	0.43	0.42	0.52	0.42	0.59
AZ Class II price	\$/CWT	-0.76	-0.96	-1.31	-1.46	-1.83	-1.91	-2.06	-2.09	-1.55	-2.09	-0.76
AZ Class III price	\$/CWT	0.36	0.28	0.15	0.07	-0.01	-0.04	-0.06	-0.11	0.08	-0.11	0.36
AZ Class IV price	\$/CWT	-0.22	-0.25	-0.34	-0.39	-0.51	-0.55	-0.60	-0.61	-0.43	-0.61	-0.22
Order 50:												
	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
CA Class I price	\$/CWT	-2.28	-2.24	-2.14	-2.00	-1.82	-1.84	-1.77	-1.82	-1.99	-2.28	-1.77
CA Class II price	\$/CWT	0.15	0.02	-0.26	-0.40	-0.67	-0.75	-0.86	-0.90	-0.46	-0.90	0.15
CA Class III price	\$/CWT	1.43	1.38	1.35	1.28	1.36	1.37	1.46	1.44	1.38	1.28	1.46
CA Class IV price	\$/CWT	0.56	0.40	0.11	0.03	-0.26	-0.33	-0.43	-0.50	-0.05	-0.50	0.56

TABLE B60: CA Class Utilization Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	841	850	857	864	870	876	880	883	865	841	883
Class II	Mil. LBS	-1209	-1190	-1239	-1232	-1262	-1296	-1346	-1384	-1270	-1384	-1190
Class III	Mil. LBS	-7200	-7540	-8072	-8709	-9184	-9571	-10034	-10455	-8846	-10455	-7200
Class IV	Mil. LBS	-7366	-7622	-7879	-7867	-8228	-8306	-8654	-8795	-8090	-8795	-7366

TABLE B61: National Class Utilization Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
Class I	Mil. LBS	-85	-78	-66	-53	-50	-42	-22	-13	-51	-85	-13
Class II	Mil. LBS	1787	1740	1532	1273	1038	972	929	855	1266	855	1787
Class III	Mil. LBS	-2717	-2571	-2724	-2912	-3243	-3325	-3491	-3627	-3076	-3627	-2571
Class IV	Mil. LBS	1207	1358	1786	2238	2774	2890	3052	3205	2314	1207	3205

TABLE B62: FMMO Class I Revenue Changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
NE Class I Revenue	Mil. \$	46.2	44.9	41.8	39.4	40.8	39.3	32.3	31.0	39.5	31.0	46.2
AP Class I Revenue	Mil. \$	16.9	16.8	15.9	14.9	15.5	15.0	12.4	12.0	14.9	12.0	16.9
FL Class I Revenue	Mil. \$	12.1	11.9	11.0	10.2	10.6	10.3	8.4	8.1	10.3	8.1	12.1
SE Class I Revenue	Mil. \$	19.1	18.6	17.3	16.0	16.7	16.3	13.1	12.6	16.2	12.6	19.1
UM Class I Revenue	Mil. \$	16.7	16.9	16.4	15.6	16.8	16.8	14.4	11.6	15.6	11.6	16.9
CE Class I Revenue	Mil. \$	22.5	21.6	20.1	18.6	19.6	19.1	15.8	15.2	19.1	15.2	22.5
ME Class I Revenue	Mil. \$	30.5	30.0	28.1	25.9	27.2	26.4	21.8	20.9	26.3	20.9	30.5
PN Class I Revenue	Mil. \$	10.1	9.9	9.3	8.7	9.2	9.0	7.5	7.2	8.9	7.2	10.1
SW Class I Revenue	Mil. \$	20.8	20.3	18.8	17.9	18.6	18.0	14.5	13.8	17.8	13.8	20.8
AZ Class I Revenue	Mil. \$	5.4	5.3	4.9	4.5	4.7	4.5	3.7	3.2	4.5	3.2	5.4
CA Class I Revenue	Mil. \$	-4.3	-2.0	4.9	14.0	26.8	28.4	34.9	35.1	17.2	-4.3	35.1

TABLE B63: U.S. Import changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Imports	Mil. LBS	0.003	0.001	0.006	0.008	0.013	0.012	0.010	0.004	0.007	0.001	0.013
Other than American Cheese Imports	Mil. LBS	2.427	3.799	4.271	4.444	4.813	4.976	5.396	5.961	4.511	2.427	5.961
Butter Imports	Mil. LBS	-0.003	-0.006	-0.020	-0.081	-0.105	-0.114	-0.093	-0.052	-0.059	-0.114	-0.003

TABLE B64: U.S. Export changes under the Dairy Institute Proposal

	Units	2017	2018	2019	2020	2021	2022	2023	2024	Average	Min	Max
American Cheese Exports	Mil. LBS	-9.952	-10.330	-9.213	-8.221	-8.148	-7.705	-7.706	-6.564	-8.480	-10.330	-6.564
Other than American Cheese Exports	Mil. LBS	-31.133	-28.788	-33.745	-21.528	-20.513	-18.982	-19.834	-17.111	-23.954	-33.745	-17.111
Dry Whey Exports	Mil. LBS	-16.108	-13.110	-11.424	-10.041	-9.886	-9.053	-9.212	-7.653	-10.811	-16.108	-7.653
Butter Exports	Mil. LBS	11.553	18.635	27.121	35.095	43.638	44.437	44.904	41.737	33.390	11.553	44.904
Nonfat Dry Milk Exports	Mil. LBS	107.128	95.464	124.512	156.749	198.559	201.684	212.419	215.326	163.980	95.464	215.326