



National Grain and Feed  
Association



North American Export  
Grain Association

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December 16, 2010

Grain Inspection, Packers and Stockyards Administration  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Room 1643-S  
Washington, D.C., 20250-3604

**RE: Comments on U.S. Standards for Corn Advance Notice of Proposed  
Rulemaking (ANPRM)**

To Whom It May Concern:

The National Grain and Feed Association (NGFA) and the North American Export Grain Association (NAEGA) appreciate the opportunity to submit this statement in response to the advance notice of proposed rulemaking (ANPRM) published in the September 17, 2010 edition of the *Federal Register* by the U.S. Department of Agriculture's Grain Inspection, Packers and Stockyards Administration (GIPSA). The ANPRM requests comments on whether the current official U.S. corn standards and grading practices need to be changed.

The NGFA, established in 1896, is a U.S.-based nonprofit trade association that consists of approximately 1,000 grain, feed, processing and grain-related firms comprising more than 7,000 facilities that handle more than 70 percent of U.S. grains and oilseeds. Affiliated with the NGFA are 26 state and regional grain and feed trade associations. The NGFA also has strategic alliances with the NAEGA and Pet Food Institute.

NAEGA, a not for profit trade association established in 1912, consists of private and publicly owned companies and farmer-owned cooperatives that are involved in and provide services to the bulk grain and oilseed exporting industry. NAEGA's mission is to promote and sustain the development of commercial export of grain and oilseed trade from the United States. NAEGA acts to accomplish this mission from its office in Washington D.C., and in markets throughout the world.

In the past, adjustments to the official U.S. grain standards and agency grading practices have been implemented to accommodate such developments as variety, class and industry

operational changes. But before such changes to the standards are made, they are evaluated carefully for (at least) two very good reasons: 1) to make certain that such changes are truly necessary to facilitate the marketing of U.S. grains, oilseeds and grain products; and 2) to maintain reasonable stability in the U.S. grain standards given their widespread recognition in U.S. and world markets. The fact that our domestic and international customers, as well as farmers and grain marketers, can count on well-known and widely recognized grade standards tends to draw customers to the U.S. grain production/marketing system, and reduces trading risks for market participants.

Changes to the U.S. grain standards create confusion and uncertainty for market participants, and should be avoided unless they can be shown to demonstrably improve or correct significant flaws in the existing standards. Unless changes are justified based upon these criteria, they are counterproductive – creating a lack of understanding, more uncertainty and increased risk among international buyers, which may tend to encourage some of our customers to seek out alternative suppliers in other countries whose grading standards are more stable and predictable.

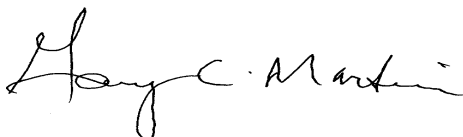
Based upon these principles, the NGFA and NAEGA believe the current U.S. Standards for Corn are meeting their stated purpose and should be retained without change. We are concerned that changes to the standards could create additional uncertainty for everyone, including domestic and international customers, as well as farmers and grain marketers.

Thank you for your consideration of our views. We would be pleased to respond to any questions you may have.

Sincerely,



Kendell Keith  
NGFA, President



Gary C. Martin  
NAEGA, President and CEO