



**National Grain
and Feed Association**

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November 1, 2017

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VIA E-FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ENTERED
Office of Proceedings
November 1, 2017
Part of
Public Record

Re: Docket No. EP 739, *Ex Parte Communications in Informal Rulemaking Proceedings*

Dear Ms. Brown:

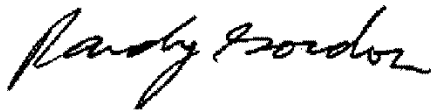
This letter is provided to the docket to inform the Surface Transportation Board (“Board”) that the national agricultural producer and agribusiness organizations¹ listed in Exhibit 1 below have notified the National Grain and Feed Association (NGFA) that they support the NGFA’s Opening Comments filed in this docket.

These parties have authorized NGFA to state to the Board that they support the agency’s proposal to modify its regulations to permit, subject to disclosure requirements, *ex parte* communications in informal rulemaking proceedings. Further, these organizations support the changes proposed by the Board to its *ex parte* rules that would clarify and update when and how interested persons may communicate with the agency in pending proceedings other than

¹ The identity and descriptions of each organization are summarized in Exhibit 1,

rulemakings. Finally, these listed organizations support the recommendations offered in the NGFA's Opening Comments designed to further improve the Board's proposal.

Respectfully submitted,



Randall C. Gordon
President
National Grain and Feed Association

Exhibit 1

National Producer and Agribusiness Organizations:

National Association of State Departments of Agriculture

National Council of Farmer Cooperatives

National Farmers Union

National Oilseed Processors Association

North American Millers' Association

National Association of State Departments of Agriculture (NASDA) is a nonpartisan, nonprofit association that represents the elected and appointed commissioners, secretaries and directors of the departments of agriculture in all 50 states and four U.S. territories. NASDA grows and enhances agriculture by forging partnerships and creating consensus to achieve sound policy outcomes between state departments of agriculture, the federal government and stakeholders.

National Council of Farmer Cooperatives (NCFC), established in 1929, is the voice of America's farmer-owned cooperatives. Its members are regional and national farmer cooperatives, which in turn consist of more than 2,500 local farmer cooperatives across the country. The majority of America's 2 million farmers and ranchers belong to one or more farmer cooperatives. NCFC members also include 21 state and regional councils of cooperatives. Farmer cooperatives handle, process and market almost every type of agricultural commodity; furnish farm supplies; and provide credit and related financial services, including export financing. Farmer-owned cooperatives also provide more than 250,000 jobs, with a total payroll exceeding \$8 billion, and contribute significantly to the economic well-being of rural America.

National Farmers Union (NFU), founded in 1902, represents family farmers, fishers and ranchers across the country, with formally [organized divisions in 33 states](#). NFU works to advocate grassroots-driven policy positions adopted by its membership to protect and enhance the economic well-being and quality of life for family farmers, ranchers and rural communities.

National Oilseed Processors Association (NOPA) organized in 1930, is a national trade association representing the U.S. soybean, canola, flaxseed, safflower seed and sunflower seed crushing industries. NOPA's membership also includes associate members that are consumers of vegetable oil or oilseed meal, including oil refiners, mixed feed manufacturers, and meat and poultry customers. NOPA represents 13 companies that are engaged in the production of food, feed, and renewable fuels from oilseeds. NOPA's member companies process more than 1.8 billion bushels of soybeans annually at 65 plants located in 21 states throughout the country – including 59 plants that process soybeans, accounting for approximately 95 percent of all soybeans that are processed (crushed) in the United States.

North American Millers' Association (NAMA) represents millers of wheat, corn, oats and rye in the United States and Canada. Its members take the raw grain and, through grinding and crushing, create flour and other products that are used to make such favorite foods as bread, pasta, cookies, cakes and snack foods. NAMA also plays a vital role in delivering nutrition to American consumers, as well as providing nutritious grain-based products to help feed those around the world. NAMA-member companies also play a vital role in delivering nutrition to American consumers, as well as providing nutritious grain-based products to help feed those around the world.