

**Comments on the Proposed Rule for
the Dairy Import Licensing Program**

No.	Name	Date
1	Bill Stephenson, DPI Specialty Foods	10/05/2007
2	Al Raffa, Seafrigo USA	10/05/2007
3	Silvia Galarza, Walker Foods, Inc.	10/12/2007
4	Marzena Silpe, Argentine Cheese Corporation	10/14/2007
5	Barry B. Elkins, World Import Distributors, Inc.	10/15/2007
6	Marilyn Levinsohn, DCI Cheese Company	10/15/2007
7	Kenneth Olsson, A.V. Olsson Trading Co., Inc.	10/16/2007
8	Janine Freed, Cheeseworks Inc.	10/17/2007

Updated 10/19/2007



Ronald Lord/Fas
10/05/2007 09:59 AM

To Jorge Martinez/Fas@Fas
cc GonzalesB@FAS
bcc
Subject Fw: temporary suspension of the historical license reduction provisions of the dairy import licensing program 7 CFR part 6

Add to list of comments

Ron Lord
Branch Chief, Sugar & Dairy Branch
ITSPD/OTP/FAS
(202) 720-6939

----- Forwarded by Ronald Lord/Fas on 10/05/2007 09:59 AM -----



<Bill.Stephenson@dpispecialtyfoods.com>@inter2@FASN
JAU
10/04/2007 05:47 PM

To Ronald Lord/Fas@Fas
cc
Subject temporary suspension of the historical license reduction provisions of the dairy import licensing program 7 CFR part 6

Hello,

We support the temporary suspension and applaud the USDA for staying abreast of the current market conditions that warrant the suspension.

Regards,

Bill Stephenson
Purchasing

Please note my new email address effective 9/17/07 is
Bill.Stephenson@dpispecialtyfoods.com

DPI Specialty Foods
12360 SW Leveton Dr, Tualatin, OR 97062
phone: 503/612-8062 fax: 503/612-8081
www.dpi-northwest.com



Ronald Lord/Fas
10/05/2007 03:38 PM

To Jorge Martinez/Fas@Fas
cc
bcc
Subject Fw: SUSPENSION OF LICENSE SURRENDER PENALTY
PROPOSED BY USDA

another comment for the list

Ron Lord
Branch Chief, Sugar & Dairy Branch
ITSPD/OTP/FAS
(202) 720-6939

----- Forwarded by Ronald Lord/Fas on 10/05/2007 03:38 PM -----



<a.raffa@seafrigo.com>@int
er2@FASNJAU
10/05/2007 03:24 PM

To Ronald Lord/Fas@Fas
cc
Subject SUSPENSION OF LICENSE SURRENDER PENALTY
PROPOSED BY USDA

Good day Ronald,

Seafrigo is a freight forwarder/NVOCC/CHB based in NJ. We are firm supporters (and member) of the Cheese Importers Association.

We are in favor of suspending this law through 5 five years in order for USDA to re-write a more palpable set of rules to accommodate the cheese importers based on market trend.

Best Rgds,
Al Raffa
Managing Director Seafrigo USA
Tel# 201-770-1143 Ext. 10
Fax# 201-867-9320

Do you know you can check the status of your containers on our website?
Goto-
www.seafrigo.com <<http://www.seafrigo.com/>>

Contact Al Raffa for more details.



Ronald Lord/Fas
10/12/2007 06:03 PM

To Jorge Martinez/Fas@Fas
cc
bcc
Subject comment

Walker Foods, Inc.

20 Theodore Conrad Drive, Jersey City, NJ 07305 - P.O. Box 2000, Jersey City, NJ 07303-2000

Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

This letter is in response to the Department's request for public comments concerning the proposed five year suspension of the historical license reduction provisions of the Dairy Tariff-Rate Quota Licensing regulation. The business of Walker Foods, Inc. is built on dairy product imports and we have made a substantial investment in reliance upon a fair and even handed regulation of the dairy import licensing program.

Since the implementation of the historical license reduction provisions of 7 CFR §6.25(b)(1) in 2004, many, if not most, historical licensees have needed to surrender more than fifty percent of a historical license amount before the annual October 1st deadline as prescribed by the Department's regulation. These recent decisions to surrender historical license amounts have more often than not been based solely on prevailing market conditions, specifically, unavailability of the product or that prices were too high to be competitive.

The adverse market conditions which our company, as well as the rest of the dairy importing community, has been struggling with are not temporary obstacles, rather they are the long term consequence of well documented major economic and production trends. Most notably, there has been a sharp rise in world dairy prices due to strong growth in world demand while at the same time production growth has been constrained in the major exporting countries, including the European Union. During this same time period, our competitive position has been further weakened by the fact that the U.S. dollar has continued to drop precipitously in value against the currencies of our trading partners.

We believe that for the foreseeable future market conditions will continue to be unfavorable for U.S. dairy importers. We also support the Department's statement expressed in the proposed rule that historical licenses provide for orderly marketing of a wide variety of cheeses and permit dairy importers to invest in market development, including brand building, with some assurance of future availability of supply.

For all of these reasons, Walker Foods, Inc. strongly supports the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1). The five year suspension period will give the Foreign Agricultural Service sufficient time to evaluate the changes in the market for our products and let the industry adjust to those changes.

Thank you for considering our views on this matter of the highest importance to Walker Foods, Inc. and our entire industry.

Very truly yours,

Silvia Galarza

Import Manager

---- Forwarded by Ronald Lord/Fas on 10/12/2007 06:02 PM ----



<Galarza.Silvia@metrony.syc
sco.com>@inter2@FASNJA
U

10/12/2007 05:27 PM

To Ronald Lord/Fas@Fas

cc

Subject

Argentine Cheese Corporation
21 Cobtail Way
Simsbury, CT 06070
(860) 559-7259

October 14, 2007

By E-mail (Ronald.Lord@usda.gov)

Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

We strongly support the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1).

Sincerely,
Marzena Silpe

WORLD IMPORT DISTRIBUTORS, INC.

427 BLOOMFIELD AVENUE, SUITE 408 MONTCLAIR, NJ 07042 TEL: (973)-746-7707 FAX: (973)-746-7577
EMAIL: SUE@WIDCHEESE.COM

October 15, 2007

By E-mail (Ronald.Lord@usda.gov)

Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

This letter is in response to the Department's request for public comments concerning the proposed five year suspension of the historical license reduction provisions of the Dairy Tariff-Rate Quota Licensing regulation.

The business of World Import Distributors is built on dairy product imports and we have made a substantial investment in reliance upon a fair and even handed regulation of the dairy import licensing program.

Since the implementation of the historical license reduction provisions of 7 CFR §6.25(b)(1) in 2004, many, if not most, historical licensees have needed to surrender more than fifty percent of a historical license amount before the annual October 1st deadline as prescribed by the Department's regulation. These recent decisions to surrender historical license amounts have more often than not been based solely on prevailing market conditions, specifically, unavailability of the product or that prices were too high to be competitive.

The adverse market conditions which our company, as well as the rest of the dairy importing community, has been struggling with are not temporary obstacles, rather they are the long term consequence of well documented major economic and production trends. Most notably, there has been a sharp rise in world dairy prices due to strong growth in world demand while at the same time production growth has been constrained in the major exporting countries,

including the European Union. During this same time period, our competitive position has been further weakened by the fact that the U.S. dollar has continued to drop precipitously in value against the currencies of our trading partners.

We believe that for the foreseeable future market conditions will continue to be unfavorable for U.S. dairy importers. We also support the Department's statement expressed in the proposed rule that historical licenses provide for orderly marketing of a wide variety of cheeses and permit dairy importers to invest in market development, including brand building, with some assurance of future availability of supply.

For all of these reasons, World Import Distributors strongly supports the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1). The five year suspension period will give the Foreign Agricultural Service sufficient time to evaluate the changes in the market for our products and let the industry adjust to those changes.

Thank you for considering our views on this matter of the highest importance to World Import Distributors and our entire industry.

Very truly yours,

Barry B. Elkins
Owner

Gary S. Ross
Owner

Susan Ibrahim
Import Manager



Innovation ~ Solutions ~ Results

October 15, 2007

By email (Ronald.Lord@usda.gov)
Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

This letter is in response to the Department's request for public comments concerning the proposed five year suspension of the historical license reduction provisions of the Dairy Tariff-Rate Quota Licensing regulation.

The business of DCI Cheese Co- Swissrose at 14 Empire Blvd, Moonachie, NJ 07074 is built on dairy product imports and we have made a substantial investment in reliance upon a fair and even handed regulation of the dairy import licensing program.

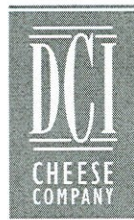
Since the implementation of the historical license reduction provisions of 7 CFR §6.25(b)(1) in 2004, many, if not most, historical licensees have needed to surrender more than fifty percent of a historical license amount before the annual October 1st deadline as prescribed by the Department's regulation. These recent decisions to surrender historical license amounts have more often than not been based solely on prevailing market conditions, specifically, unavailability of the product or that prices were too high to be competitive. For example, this year our company surrendered a considerable amount of EU Swiss Emmenthaler, EU Processed Gruyere and Argentina IOL historical licenses due to explosive increase in product prices for dairy products to a convergence of several events in 2007. First, the decline of the EU global dairy markets due to the suspension of all dairy subsidies. The lack of milk and export restrictions imposed by Argentina is another factor. The devaluation of the U.S. dollar has pushed the price of dairy products higher. Current high prices of milk suggest that more milk will be allocated for domestic production by exporters with less being used for butter, cheese and other dairy products.

DCI Richfield
3018 Helsan Drive
PO Box 282
Richfield, WI 53076
Phone (262) 677-3407
Fax: (262) 677-3806

DCI Swissrose
14 Empire Boulevard
Moonachie, NJ 07074
Phone (201) 807-0999
Fax: 201-807-9509

DCI Green Bay
13190 Velp Avenue
PO Box 11766
Green Bay, WI 54313
Phone (920) 434-3233
Fax: (920) 434-3262

DCI G&G
322 Bellevue Avenue
Santa Rosa, CA 95407
Phone (707) 542-6300
Fax: (707) 542-6370



Innovation ~ Solutions ~ Results

The adverse market conditions which our company, as well as the rest of the dairy importing community, has been struggling with are not temporary obstacles, rather they are the long term consequence of well documented major economic and production trends. Most notably, there has been a sharp rise in world dairy prices due to strong growth in world demand while at the same time production growth has been constrained in the major exporting countries, including the European Union. During this same time period, our competitive position has been further weakened by the fact that the U.S. dollar has continued to drop precipitously in value against the currencies of our trading partners.

We believe that for the foreseeable future market conditions will continue to be unfavorable for U.S. dairy importers. We also support the Department's statement expressed in the proposed rule that historical licenses provide for orderly marketing of a wide variety of cheeses and permit dairy importers to invest in market development, including brand building, with some assurance of future availability of supply.

For all of these reasons, DCI Cheese Co- Swissrose strongly supports the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1). The five year suspension period will give the Foreign Agricultural Service sufficient time to evaluate the changes in the market for our products and let the industry adjust to those changes.

Thank you for considering our views on this matter of the highest importance to DCI Cheese Co - Swissrose and our entire industry.

Very truly yours,

Marilyn Levinsohn
Manager, Int'l Logistics and Reg
Compliance

Cc: Dominique Delugeau- DCI Cheese Co

DCI Richfield
3018 Helsan Drive
PO Box 282
Richfield, WI 53076
Phone (262) 677-3407
Fax: (262) 677-3806

DCI Swissrose
14 Empire Boulevard
Moonachie, NJ 07074
Phone (201) 807-0999
Fax: 201-807-9509

DCI Green Bay
13190 Velp Avenue
PO Box 11766
Green Bay, WI 54313
Phone (920) 434-3233
Fax: (920) 434-3262

DCI G&G
322 Bellevue Avenue
Santa Rosa, CA 95407
Phone (707) 542-6300
Fax: (707) 542-6370

A.V. OLSSON TRADING CO., INC.

Importers of Quality Food Products

2001 WEST MAIN ST
SUITE 215
STAMFORD, CT 06902

(203) 969-2090

TOLL FREE (877) 929-3999 (US)

FAX (203) 969-2098

October 16, 2007

By E-mail (Ronald.Lord@usda.gov)

Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

This letter is in response to the Department's request for public comments concerning the proposed five year suspension of the historical license reduction provisions of the Dairy Tariff-Rate Quota Licensing regulation.

The business of A. V. Olsson Trading Co., Inc. is built on dairy product imports and we have made a substantial investment in reliance upon a fair and even handed regulation of the dairy import licensing program.

Since the implementation of the historical license reduction provisions of 7 CFR §6.25(b)(1) in 2004, many, if not most, historical licensees have needed to surrender more than fifty percent of a historical license amount before the annual October 1st deadline as prescribed by the Department's regulation. These recent decisions to surrender historical license amounts have more often than not been based solely on prevailing market conditions, specifically, unavailability of the product or that prices were too high to be competitive.

The adverse market conditions which our company, as well as the rest of the dairy importing community, has been struggling with are not temporary obstacles, rather they are the long term consequence of well documented major economic and production trends. Most notably, there

Mr. Ronald Lord

October 16, 2007

Page 2

has been a sharp rise in world dairy prices due to strong growth in world demand while at the same time production growth has been constrained in the major exporting countries, including the European Union. During this same time period, our competitive position has been further weakened by the fact that the U.S. dollar has continued to drop precipitously in value against the currencies of our trading partners.

We believe that for the foreseeable future market conditions will continue to be unfavorable for U.S. dairy importers. We also support the Department's statement expressed in the proposed rule that historical licenses provide for orderly marketing of a wide variety of cheeses and permit dairy importers to invest in market development, including brand building, with some assurance of future availability of supply.

For all of these reasons, A. V. Olsson Trading Co., Inc. strongly supports the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1). The five year suspension period will give the Foreign Agricultural Service sufficient time to evaluate the changes in the market for our products and let the industry adjust to those changes.

Thank you for considering our views on this matter of the highest importance to A. V. Olsson Trading Co., Inc. and our entire industry.

Very truly yours,

A. V. OLSSON TRADING CO., INC.



Kenneth Olsson

President

**CHEESE WORKS INC
247 MARGARET KING AVENUE
RINGWOOD, NEW JERSEY 07456
(973)962-1413**

October 17, 2007

By E-mail (Ronald.Lord@usda.gov)

Mr. Ronald Lord
Branch Chief, Sugar and Dairy Branch
Import and Trade Support Programs Division
Foreign Agricultural Service
Room 5531-S
STOP 1021
1400 Independence Avenue, S.W.
Washington, DC 20250

Re: Comments to Proposed Rule (72
Fed. Reg. 56677) published October 4, 2007

Dear Mr. Lord:

This letter is in response to the Department's request for public comments concerning the proposed five year suspension of the historical license reduction provisions of the Dairy Tariff-Rate Quota Licensing regulation.

The business of Cheeseworks Inc. is built on dairy product imports and we have made a substantial investment in reliance upon a fair and even handed regulation of the dairy import licensing program.

Since the implementation of the historical license reduction provisions of 7 CFR §6.25(b)(1) in 2004, many, if not most, historical licensees have needed to surrender more than fifty percent of a historical license amount before the annual October 1st deadline as prescribed by the Department's regulation. These recent decisions to surrender historical license amounts have more often than not been based solely on prevailing market conditions, specifically, unavailability of the product or that prices were too high to be competitive.

The adverse market conditions which our company, as well as the rest of the dairy importing community, has been struggling with are not temporary obstacles, rather they are the long term consequence of well documented major economic and production trends. Most

Mr. Ronald Lord
[Date]
Page 2

notably, there has been a sharp rise in world dairy prices due to strong growth in world demand while at the same time production growth has been constrained in the major exporting countries, including the European Union. During this same time period, our competitive position has been further weakened by the fact that the U.S. dollar has continued to drop precipitously in value against the currencies of our trading partners.

We believe that for the foreseeable future market conditions will continue to be unfavorable for U.S. dairy importers. We also support the Department's statement expressed in the proposed rule that historical licenses provide for orderly marketing of a wide variety of cheeses and permit dairy importers to invest in market development, including brand building, with some assurance of future availability of supply.

For all of these reasons, Cheeseworks, Inc strongly supports the adoption of the five year temporary suspension of the provisions of Section 6.25(b)(1). The five year suspension period will give the Foreign Agricultural Service sufficient time to evaluate the changes in the market for our products and let the industry adjust to those changes.

Thank you for considering our views on this matter of the highest importance to Cheeseworks Inc. and our entire industry.

Very truly yours,



Janine Freed
Cheeseworks Inc
Purchasing