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National Bison Association

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FSIS Docket Clerk, Docket #98-052P
Room 102-Cotton Annex Building
FSIS, USDA
Washington, DC 20250-3700

98-052P
98-052P-17
Samuel W. Albrecht

April 1, 1999

The National Bison Association opposes the proposed increase in voluntary meat inspection fees. Bison producers are already at an economic disadvantage when competing with meat which receives free inspection. As the public becomes increasingly concerned regarding safe food, meat inspection is important to the acceptance of our product.

The proposed increase is a 12% increase in the base rate whereas the justification for the increase is tied to the 3.1% pay increase for federal employees and a 1.9% rate of inflation. Those numbers do not add up to 12%.

We disagree with the proposed rule statement that "small establishments would not be affected adversely by the proposed fee increases." Our industry is comprised of "small establishments" when compared to the size of beef, pork or chicken. This rule will have a direct, negative impact on our producers and our industry.

The National Bison Association represents over 2,300 bison producers who raise 250,000 head of bison in all 50 states.

Sincerely,

Samuel W. Albrecht
Executive Director