

April 14, 2009

Division of Dockets Management (HFA305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Re: Docket FDA-2002-N-0031

To Whom It May Concern:

Thank you for the opportunity to comment on FDA's intended delay of 60 days in the effective date of the rule to ban the use of certain materials from 30-month or older cattle in animal feed (the feed rule). The delay in implementation of the feed rule is very much needed and I strongly support FDA's intentions to proceed with an extension of its effective date.

The encroaching implementation date for the feed rule has already resulted in... ***(INSERT HERE YOUR OWN COMMENTS AND EXPERIENCES, such as loss of disposal/rendering services, cost to your operation, delivery of dead stock over long distances to renderers or landfills, your problems with other means of disposal, i.e. burial, incineration, landfill, etc.)***

For the reasons stated above and others, I however do not believe that a 60 day extension of implementation of the feed rule is sufficient. Implementing the feed rule in the midst of the summer months, when there is always greater numbers of dead stock due to heat and drought and when alternative proper means of disposal still may not be readily available, could be potentially disastrous. Thus, I strongly urge FDA to consider extending the effective date by at least 180 days to give livestock producers, auction markets and others more time over the critical summer months to seek out or establish alternative means of disposing of their 30-month or older cattle dead stock.

I also request that FDA consider re-opening the final rule for comment on whether the rule should be withdrawn in its entirety. I do not believe that sufficient consideration was given by the agency of the enormous disposal problems that we are now seeing and will continue to see in many parts of the country as a result of this rule versus the very minimal risk of spreading a cattle disease that has not been conclusively shown to be present in our country and that is already mitigated by previous measures taken by FDA, U.S. Department of Agriculture, the feed industry and livestock producers.

Thank you for your consideration of my comments.

Sincerely,