

December 21, 2020

FCIC Board of Directors
USDA/RMA/Stop 0801
Room 6092-South
1400 Independence Ave. SW
Washington, DC 20250



Dear Chairman Johansson and Board Members,

On behalf of the Rural & Agriculture Council of America (RACA), I would like to express our strong disagreement to the Risk Management Agency's (RMA) 'Alternative Recommendations' and 'Contractor Recommendations' for Pasture, Rangeland and Forage (PRF) released September 21, 2020. The suggested changes would neuter the PRF policy's function and severely decrease its utility as a risk management tool for livestock and forage operations.

Our organization remains grateful for your decision this summer to make improvements to Livestock Risk Protection and at the time noted our appreciation for RMA's willingness to listen. The recommendations released on September 21st now force us to wonder what may have changed since summer. The unusual, unattributed 'Alternative Recommendations' along with out-of-touch 'Contractor Recommendations' both showcase severe knowledge deficits relating to livestock production, plant physiology, rangeland ecosystems and more.

We humbly ask the Board block implementation of any 'recommendations' related to PRF – regardless of the source – until RMA and the livestock industry can establish proper dialogue as to the importance and function of PRF to our business. Education, transparency, and collaboration should not be viewed as negatives.

Our organization would greatly appreciate the Board reviewing the proposed Program Maintenance items for PRF and taking such action as necessary to ensure the producers whom the policy was designed to protect are heard.

Sincerely,

Jack Alexander
President, Rural & Agriculture Council of America

Encl: Comments Concerning 'Alternative Recommendations' & Comments Concerning 'Contractor Recommendations'