

Dairy Farmers of America
1405 N. 98th St.
Kansas City, KS 66111

January 14, 2020

Don Onwiler
1135 M Street, Suite 110
Lincoln, NE 68508

Dear Mr. Onwiler,

I am writing on behalf of Dairy Farmers of America, Inc. (DFA) to address agenda Item VTM 20.2 to widen tolerances for vehicle mounted milk meters.

DFA is opposed to the proposal on the grounds that broadening tolerances introduces more uncertainty into the transaction between the buyer and seller of milk. Uncertainty around the price of milk will have consequences for the dairy industry as a whole and the livelihoods of the producers we represent.

The practice in the U.S. dairy industry is that milk is usually measured when collected at the farm (meter or farm bulk tank). Producers are generally paid using this measurement. This measurement is then compared against a measuring device (meter or scale) at the plant. Differences between these measurements when compared are called “variance” or “shrink”. Variance can lead to disputes between vendors and purchasers of milk which cost the industry in terms of time, resources and efficiency. The effect of increasing tolerances for vehicle mounted milk meters would be to allow greater meter error. This would mean that a meter could have a greater allowable difference from the plant scale or meter. We see this as introducing further unwanted variance, with the potential to undermine confidence in the integrity of the transaction.

In addition, we believe that technological advances should bring improvements in their field, or at least equal the existing standards. New measuring devices/systems should be at least as accurate as existing methods (farm bulk tanks, scales or meters).

We believe that tolerances should be set according to the needs of the industry as a whole and not to accommodate one specific measuring system. Given that there is an existing certificate in place for a vehicle mounted milk meter (NTEP CC 19-121) there is no need to change the existing tolerances to allow the use of this technology.

Thank you for your time and that of the Committee in addressing this important matter.

Sincerely,



Brandon Meiwes
Director, Industry and Regulatory Affairs
Dairy Farmers of America

