

**North American Millers' Association**

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March 6, 2006

Director  
Commodity Procurement Policy & Analysis Division  
Farm Service Agency  
United States Department of Agriculture (USDA)  
1400 Independence Avenue, SW, Rm. 5755-S  
Washington, DC 20250-0512

On the matter of: Proposed Rule on Procurement of Commodities for Foreign Donation

Dear Sirs:

The North American Millers' Association is pleased that an extension of the comment period permits us to offer this input on the notice regarding freight bids on export food aid programs. NAMA is the trade association of the wheat, corn, oat and rye milling industry. It is comprised of milling member companies operating mills in the United States and Canada and associate member companies representing the industries providing products and services to the mills. The aggregate production capacity of NAMA milling members is more than 160 million pounds of product daily, which is about 95% of the total U.S. capacity. In addition, many of our members are vendors of value-added grain products to the US overseas food aid programs. They provide a large portion of the processed and fortified food products under those programs.

NAMA supports the move to a one-bid freight system and has looked forward with great anticipation to the technological ability to implement this alternative. From our understanding of the proposal, it will streamline the process of evaluating freight bids and the marrying of freight and commodity offers to achieve lowest landed cost objectives. We anticipate fewer incidents of non-economic placement of cargo for the purposes of freight bid idiosyncrasies. This should simplify bid analysis dramatically.

From our conversations with implementing partners, this streamlining could result in more timely deliveries, which can pay important dividends to the programs and improve effectiveness to the beneficiaries. Any process improvements that can assist in eliminating delays will make the program more effective and lower costs.

NAMA fully supports the single bid freight changes and encourages their expedited implementation.

Sincerely,

Betsy Faga  
President