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From: DellBrothers [mailto:dellbrothers@yahoo.com]

Sent: Tuesday, December 22, 2009 11:00 AM

To: ATR-Agricultural Workshops

Subject:

December 15, 2009

Legal Policy Section
Antitrust Division
U.S. Department of Justice
450 5th Street, NW. Suite 11700
Washington, DC 20001

To Whom It May Concern:

I am a corn, soybean, popcorn and barley farmer of nearly 2700 acres in the Westminster, Maryland area. My great-grandfather began farming 80 years ago and the tradition has been passed on down to me, and I expect it to continue for future generations of my family. I am also a local seed dealer in the area.

The issues and changes in the farming community are very important to me and I'd like to take the opportunity to voice my opinion before the USDA and Department of Justice begin the public workshops on the agriculture sector.

I think the most important thing to point out is that I believe that there is plenty of competition between seed brands and seed choices in my area. In the past ten years, there has been a significant increase in varieties of seed choices available to farmers, all at different prices. I would estimate a minimum of ten brands of seeds available to farmers, while each one grows three to four brands on his farm. Most of which have different biotech traits in them.

The biotech trait options are important to the grower because of multitude of advantages they offer. Most of the time these seeds produce a higher yield, which is obviously important to the overall financial output of the farm, but the other advantages of these seed traits are in the weed, insect and disease control. Farmers are using less and less chemicals and pesticides with biotech seeds, and spraying less, which is friendlier to the environment, the consumer and beyond.

Farmers have many decisions to make, and seed choice is likely the most important. With the many seed varieties and prices to choose from, the farmer can make a fair decision based on performance and yield. Price is important to everybody, but the return on investment can sometimes compensate for a more expensive seed. In many cases, the price is more important to a farmer's decision as it can outweigh the different varieties of seeds. But the important thing to remember is that the farmer has the option.

Another thing to understand in some of the price increases these days is that it isn't only seeds that are more expensive, but that everything else has gone up as well. Fuel prices have gone up, as well as labor cost and fertilizer prices. The difference is that diesel fuel

is still diesel fuel, and fertilizer is the same fertilizer. It still takes the same amount of time for laborers to work at a higher pay, but seeds are performing at much higher rates and are producing better crops, yields and return on investment. It is worth the increase to have higher production output. Not to mention the private investors are putting money back into research, which in turn continues to develop newer, better varieties of seeds and helps farmers compete in the global market, which is what determines the over-all equation of supply and demand.

Thank you for taking the time to read my thoughts and opinions in this matter. I sincerely hope you consider my views during the public comment period.

Sincerely,

Tommy Dell
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