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To: ATR-Agricultural Workshops <agriculturalworkshops@usdoj.gov>
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December 15, 2009

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

Dear Sir or Madam:

Biotech seed has caused many farming innovations. I've seen this on my own farm. My wife and I, along with some hired help, farm around 900 acres of corn and soybeans. I've been in farming for forty years, and my father was a farmer before that. He started in the early 1940s.

I've also been around the seed business for thirty years. I sold Pioneer seed for over twenty years, and now Kruger for about nine years, and I find it interesting that the competition amongst seed always seems to come down to money eventually.

There are probably fifty seed choices available in my area, many more than there were only ten years ago. Since I'm a farmer-dealer, I only plant what I sell. I only used Pioneer when I sold that brand, and now I plant Kruger. But performance is the main factor in my choice of seeds. It's probably initiated by marketing and advertising, but if it doesn't perform, we don't use it again. I also consider price and service when buying seed.

When I started selling Pioneer, I sold seed. And now I'm selling a rootworm trait, a herbicide trait, a corn borer trait, and we're dangerously very close to a drought trait. I'm not just selling seed today. And as you talk to the fertilizer and chemical people, they realize a portion of their income used to come from insecticide. Now they're selling little or no insecticide. Seed dealers are doing that part of that for them.

Depending on the traits, a bag of seed can range from \$125 to \$400. I've paid more for seed because it was supposed to perform better, but it didn't always work out that way.

Now that I've been on the other side of the fence as a dealer, I think that people buy into an idea or a system or a hat with a logo. "Dad did it, so that's the way I'm still going to do it." Sometimes we as farmers find that products from other companies are very good also, and in some cases better. In these times we have to be willing to change.

All of the seed companies spend a lot of time with weigh wagons, selling the idea that their product is yielding more or drier than another. But it seems like when push comes to shove, they end up competing on price.

I've also been involved with the management system for which I custom farm. For instance, they plant some non-GMO products and I've personally been buying into the new technologies as they come along. They seem to make money and do that the next year, so I'm looking at their yields and my yields, and I know they pay less for their seed.

I also review hybrid and variety trials from neighboring farms and universities. In fact, I spent a couple of hours just last night looking through the first trials on the Internet. I mainly look to make sure that I'm not going down the wrong road. I have a yield monitor as well, and we map the results.

Farms have gotten bigger since biotech was introduced. I'm an old enough person to remember when dad was cultivating and he had weeds in his corn. A neighbor had just moved into the neighborhood and he had sprayed his corn. So his corn was clean, but it was kind of like he cheated.

Yields have definitely gotten better with biotech. If we didn't have the herbicides to take care of the weeds today, we couldn't have 10,000 acre farmers. We probably wouldn't have many thousand acre farmers. Fuel use has dropped. I'm basically a no-till farmer. We have better soil conservation.

Private investment gets ideas started, and the public sector makes it a trend. The companies couldn't do that without the intellectual property rights to their products. I believe that they will pour money into it and make a better product if it's to their advantage. In doing so, they've made farmers more competitive.

Thank you for taking the time to consider my opinions before the public workshops.

Yours truly,

Allen Oltmanns
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