

Dairylea

Cooperative Inc. ☘

December 31, 2009

Legal Policy Section
Antitrust Division
U.S. Depart. of Justice

To Whom It May Concern:

Dairylea Cooperative Inc. represents more than 2,500 dairy farms located throughout the Northeast. We recently celebrated our 100th anniversary in 2007, which is a testament to the dedication and commitment of our farmer-members, and to the value that a cooperative provides to its farms.

As you know, farmers can work together for the betterment of their livelihoods through the Capper Volstead Act, which has been in place since 1922. In fact, a long-time Dairylea employee was part of the group that drafted the original language of the Capper Volstead Act.

The value and importance of Cooperatives continues to be very relevant. In addition to delivering competitive market premiums, cooperatives also bring efficiencies regarding the logistics of moving milk and the interaction with dairy processing customers. For an individual farm to negotiate its deliveries of milk and price with large processing customers would be impractical and difficult. Also, it is important to note that a member of a cooperative is provided a guaranteed market for their milk. Having just been through one of the longest over-supply periods for milk, Dairylea Cooperative was able to place all of its members' milk while maintaining the premiums it paid to farms over the Federal Order minimum price.

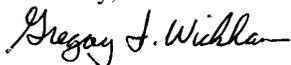
In addition to ensuring efficient transportation of milk at a competitive price, cooperatives also act as advocates for their farmer-members. Legislative policy has significant impact on farms and cooperatives provide both leadership and a strong voice for members at the regional, state, national and international levels on legislative policy.

Dairylea Cooperative is unique, in that it offers seven additional services to its members to help them run their business and improve their net profit. These services include health insurance programs, financing options for on-farm needs, input purchasing programs, risk management programs and assistance with business planning. Dairylea helps create economic value above and beyond a milk check.

Cooperatives, by definition, are owned by their members and grassroots organizations. Our farmer-owners take great pride in that ownership and actively participate in Cooperative activities in many ways. Some serve as Delegates, Resolution Committee Members or Board Members. Others serve on work groups or other committees such as the Legislative Advisory Committee. The Cooperative's management group receives strong direction from all of its members and the Board. We operate in a very transparent manner, as four of our twelve monthly board meetings are "open", and we typically get more than 150 additional farms participating in these meetings.

As you begin your listening tour on cooperatives and evaluating the relevance of the Capper Volstead Act, I urge you to take a look at all that cooperatives offer and their importance to the farms that choose to be members. Members elect leaders who are involved in directing the cooperative – it is truly the grassroots process at work. I encourage you to contact us if more information is needed regarding the positive work cooperatives do for their members.

Sincerely,



Gregory I. Wickham
Chief Executive Officer
Dairylea Cooperative Inc.