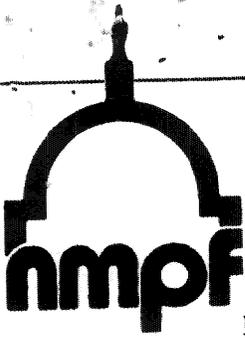


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# National Milk Producers Federation

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National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 FAX 703-841-9328

- Agri-Mark, Inc.
- Associated Milk Producers, Inc.
- Black Hills Milk Producers
- Cass-Clay Creamery, Inc.
- Continental Dairy Products, Inc.
- Cooperative Milk Producers Assn.
- Country Classic Dairies, Inc.
- Dairy Farmers of America, Inc.
- Dairylea Cooperative Inc.
- Elite Milk Producers, Inc.
- Ellsworth Cooperative Creamery
- Farmers Cooperative Creamery
- First District Association
- Foremost Farms USA
- Land O'Lakes, Inc.
- Manitowoc Milk Producers Coop.
- MD & VA Milk Producers Cooperative Association, Inc.
- Michigan Milk Producers Assn.
- Mid-West Dairymen's Company
- Milwaukee Cooperative Milk Producers
- Niagara Milk Cooperative, Inc.
- Northwest Dairy Association
- Prairie Farms Dairy, Inc.
- St. Albans Cooperative Creamery, Inc.
- Scioto County Co-op Milk Producers' Assn.
- Select Milk Producers, Inc.
- Southeast Milk, Inc.
- Swiss Valley Farms, Co.
- Tillamook County Creamery Assn.
- United Dairymen of Arizona
- Upstate Farms Cooperative Inc.

October 19, 2001

Christine J. Lewis, Ph.D.  
 Director, Office of Nutritional Products, Labeling, and Dietary Supplements  
 Food and Drug Administration  
 Room 1832  
 HFS-800  
 200 C Street, SW  
 Washington, DC 20204

Dear Dr. Lewis:

This letter is submitted on behalf of the National Milk Producers Federation (NMPF). The National Milk Producers Federation, headquartered in Arlington, VA, develops and carries out policies that advance the well-being of U.S. dairy producers and the cooperatives they collectively own. The members of NMPF's 30 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of 60,000 dairy producers on Capitol Hill and with government agencies. NMPF represents a large segment of the dairy producers and processors who would be impacted by any change to the standards of identity for dairy products.

On September 6, 2001, NMPF sent a letter to FDA to endorse a Citizen Petition, dated December 2, 1999 and submitted to FDA by the American Dairy Products Institute (ADPI). In this petition, ADPI seeks to allow for the use of liquid ultrafiltered (UF) milk in cheese making. Since that time, the National Cheese Institute (NCI) has also sent a letter to FDA indicating their support for the ADPI petition to only allow the use of liquid UF milk for cheese making.

While NMPF fully endorses the ADPI petition to allow only liquid UF milk to be used in cheese making, we believe it is essential that a definition of "liquid" be established as a reference point. NMPF requests that a limitation of 45% total solids be included in any change that will allow for liquid UF milk to be used for cheese making. This value of 45% total solids will allow for ultrafiltration technologies to be used to concentrate milk, thus preserving the liquid state of the product. A product with greater than 45% total solids has more than likely undergone a subsequent treatment for concentration beyond ultrafiltration.

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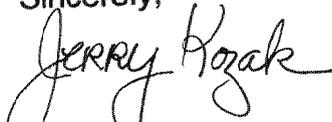
Jerry Kozak, President/Chief Executive Officer

James P. (Tom) Camerlo, Chairman

NMPF believes that this value is necessary to explicitly define what "liquid" means in liquid UF milk for cheese making. Setting a demarcation point will serve to mitigate potential misinterpretations and provide clarity for enforcement. We believe that agreement by NMPF, ADPI, and NCI on the ADPI petition with a 45% total solids definition for liquid would provide substantial industry consensus toward resolving this issue.

In conclusion, NMPF fully endorses the ADPI petition and feels a limitation of total solids is necessary. Thank you for the opportunity to provide these comments. We would be pleased to answer any questions or provide additional information, upon request.

Sincerely,



Jerry Kozak

Jerry Kozak  
President and CEO