

Utah Dairymen's Association  
P.O. Box 359  
Lehi, Utah 84043

December 27, 2005

Rita Nalubola  
Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852  
Docket No. 2003-0132

Dear Ms.Nalubola

The Utah Dairymen's Association oppose the proposed changes by FDA that would allow for the use of any safe and suitable "milk derived" ingredient in the manufacture of frozen desserts.

Without a defined list of milk-derived ingredients, consumers will not have knowledge of what products are used in the making of their ice cream.

Weakening the definition of milk could hurt Utah dairy farmers. Imported dry ultra-filtered milk and milk protein concentrates have flooded the U. S. market, displacing domestic fluid milk and nonfat dry milk due to a substantial price advantage.

It is our view that the above concerns and that of sanitary regulations for ingredients outside the U.S. far out weigh the need to streamline the labeling of frozen desserts. The consumer should be able to know the origin of dairy products used to make the ice cream they choose to purchase.

Thank you for your consideration.

Sincerely,

Greg Radmall, Executive Director