



October 30, 2016

FSA Administrator Val Dolcini
Farm Service Agency
United State Department of Agriculture
Washington, DC 20250

Dear Administrator Dolcini and Deputy Administrator Pfaff,

First, we would like to thank you for the opportunities we had this past year to visit with your office about matters important to FSA functions and service to our nation's producers. There are some very real and challenging concerns on the horizon. At this time, we understand that some states may be requesting waivers of late filing fees for fall reporting deadlines for fall seeded crops. We are hearing from producers that because this is a new deadline in their state, and combined with the additional MAL and LDP workload in many areas, the wait time to schedule an appointment is well beyond the November deadlines in many cases. NAFEC asks that you consider extending similar waivers of late filing acreage reporting fees that producers in other states have been afforded in recent years due to these new acreage reporting deadlines.

On a similar note, NAFEC would like to re-address a topic we brought to your attention the past two years. FSA should seriously consider the compliance procedure with regard to permanently establishing July 15th as the acreage reporting deadline for non-NAP and non-PRF perennial grass crops, whether grazed or mechanically harvested, for which producers would be receiving no benefit. With the 2014 Farm Bill now being fully implemented and administered, NAFEC believes that this would help both producers and county office staff administer crop reporting much more effectively and efficiently. Certainly, if a producer were to be reporting the fall seeded or spring seeded crops by an earlier deadline, a full farm report to capture the perennials should be encouraged. However, on farms with no other crops but perennials to report that have no NAP or RMA requirements, a significant workload problem would be addressed by having such acreage reported by July 15th. Please note that with the current LFP signup, new farms and new producers have, and will continue to be, established. This is creating a tremendous amount of new and permanent compliance workload, and much of it is specifically farms, tracts, and fields with no base acreage, and do not participate in NAP or PRF. Given our staffing limitations, our need to take accurate acreage reports, and the additional, permanent workload that LDAP implementation has brought about, we would hope you will continue working to influence this change if possible. We appreciate working with you and striving to make the FSA the best it can be for our nation's farmers and ranchers.

Sincerely,

Craig Turner, NAFEC President