



# R-CALF

## R-CALF United Stockgrowers of America

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August 1, 2006

Dr. Chuanfa Guo, Senior Risk Analyst  
 Risk Assessment Division  
 Office of Public Health Science  
 U.S. Department of Agriculture  
 1400 Independence Avenue, SW, Room 344  
 Aerospace Center, Washington, DC 20250-3700

### Re: Request for Extension of Time in Docket Number FSIS-2006-0011

Dear Dr. Guo,

The Ranchers-Cattlemen Action Legal Fund, United Stockgrowers of America (R-CALF USA) requests an extension of time to file comments on the most recent Harvard Risk Assessment, which was discussed at a technical briefing in Washington, D.C., on July 25, 2006. R-CALF USA represents thousands of independent U.S. cattle producers directly affected by United States Department of Agriculture (USDA) decisions pertaining to the evaluation and acceptance of risks associated with bovine spongiform encephalopathy (BSE).

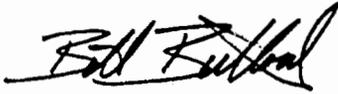
Although USDA had had the revised Harvard Risk Assessment for more than seven months, the agency gave the public only 30 days for comment on this very complex report. Thirty days is insufficient time to evaluate the new assumptions and analyses in the revised Harvard Risk Assessment, which is the primary basis for USDA's conclusion that the U.S. cattle herd and U.S. consumers are not exposed to unacceptable risks from importing cattle and beef from Canada.

Additionally, while R-CALF USA had a representative in attendance during the July 25 meeting, presenters there provided technical details too numerous to capture in notes. R-CALF USA subsequently contacted the Food Safety Inspection Service's office to request a transcript of the proceedings so we would have an accurate basis from which to formulate our public comments. However, we were told the transcript would not be posted for at least three to four weeks after the event – well after the deadline of Aug. 11, 2006, to submit comments.

Dr. Chuanfa Guo, Senior Risk Analyst  
August 1, 2006  
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For the reasons set forth above, R-CALF USA respectfully requests an extension of time to file public comments in Docket Number FSIS -2006-0011 until 45 days after the FSIS publishes the transcript of the July 25, 2006, meeting on its website. Please let us know as soon as possible if you will accommodate our request.

Sincerely,



Bill Bullard  
R-CALF USA CEO

cc: Secretary of Agriculture Mike Johanns