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November 6, 2015

The Honorable Sid Miller
Commissioner, Texas Department of Agriculture
P.O. Box 12847
Austin, Texas 78711-2847

Dear Commissioner Miller:

We are writing to you regarding the fee increases that the Texas Department of Agriculture has proposed to go into effect December 1, 2015.

We believe the proposed fee increases will negatively impact many of our members. Further we believe the increases will not only impact their pocketbooks, but will also affect them through their respective agricultural industries. Due to the significance of these fee increases we feel it is important that TDA provide an analysis demonstrating that the increases will not negatively impact the Texas Agricultural economy.

The September 2015 Cost Recovery Rate Document distributed by TDA states that "early discussions with stakeholders" took place; however in communicating with other stakeholder groups, the impacts to users is not completely understood. To ensure that there are no severe economic impacts to Texas farmers and ranchers as well as the Texas economy, we are requesting an extension of the comment period until the impacts have been considered.

We question the need for these increases in fees. TDA has not demonstrated that the increases will result in an increase in services provided. An increase in fees with no increase in service or benefits is difficult to justify. It is also unclear if the increased fees will fund additional functions or activities. We believe the fees should only apply to the charged service and not to other activities in TDA.

We respectfully request that you extend the comment period by an additional 30 days to allow stakeholders within the industry to examine the proposed fee increases to the fullest extent possible. An extended comment period will also allow proper time for TDA to analyze the impacts the proposed fees will have on the agricultural economy.

Sincerely,

Russell Boening
President

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