



February 25, 2011

Docket No. APHIS-2010-0041
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: Pioneer Hi-Bred International, Inc. Seed Production Technology (SPT) Process; DP-32138-1 Corn, Docket No. APHIS-2010-0041

Dear Sir/Madam:

The National Corn Growers Association (NCGA) appreciates the opportunity to comment to the Federal Register (FR) notice requesting comment on the proposed determination of nonregulated status by the United States Department of Agriculture, Animal Plant Health Inspections Service (APHIS) on Pioneer Hi-Bred International's Seed Production Technology (SPT) process petition.


Founded in 1957, NCGA represents approximately 36,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA and its 48 affiliated state associations and checkoff organizations work together to help protect and advance corn growers' interests.

NCGA recognizes this unique application of biotechnology and are aware of the potential for this technology to increase the efficiency of seed production. NCGA views this as a positive step forward for the technology platform and for seed production. It is our understanding that the application of Pioneer's SPT process can decrease the cost and area of seed production. All of this can be accomplished without introducing a new trait into grain production, or impacting domestic or international markets for corn. Due to these factors and USDA's safety assessment, NCGA supports Pioneer Hi-Bred International's petition for non-regulated status for SPT (event DP-32138-1).

Thank you for the opportunity to provide these comments.

Sincerely,

National Corn Growers Association


Barton Schott, President

WWW.NCGA.COM

NATIONAL OFFICE
632 Cepi Dr.
Chesterfield, MO 63005
(636) 733-9004
Fax: (636) 733-9005

WASHINGTON, DC OFFICE
122 C Street NW, Suite 510
Washington, DC 20001-2109
(202) 628-7001
Fax: (202) 628-1933