



SOUTH DAKOTA FARM BUREAU[®]

December 11, 2020

Administrator Barbre
Product Administration and Standards Division, USDA-RMA
P.O. Box 419205
Kansas City, MO 64133

Administrator Barbre,

Thank you for the opportunity to provide comments on USDA-RMA's evaluation of the Pasture, Rangeland, Forage Rainfall Index Crop Insurance (PRF) Program. South Dakota Farm Bureau (SDFB) represents livestock producers and those that provide feed for livestock across the substantial geographic area that is South Dakota. Those producers use the PRF program to offset losses in feed or forage.

In general, SDFB requests that as RMA considers changes to the PRF program, you look for ways to increase flexibility and options for producers using this product. South Dakota's climate, grasses, and agricultural operations are diverse. Providing maximum flexibility allows producers to find an insurance product that fits their unique needs. Recommendations such as blocking out intervals or lengthening intervals removes options for producers, limiting their ability to build a product that will provide the best insurance for their operation.

SDFB also has concerns about the proposal to utilize smaller grid sizes. South Dakota has limited weather reporting stations. In many cases, shrinking grid sizes will not actually provide better data since there is such limited data currently. One solution to this problem would be to add more weather stations.

SDFB supports moving the sales closing date to December 1st. This would allow for greater time for producers to make their selection during what could be a busy harvest season.

Thank you again for the opportunity to provide feedback on these recommendations. Feel free to reach out to SDFB's Director of Public Policy, Dani Hanson at dani@sdfbf.org should you have any questions.

Sincerely,



Scott VanderWal, President
South Dakota Farm Bureau



Krystil Smit, Executive Director
South Dakota Farm Bureau