

As a taxpayer (and a farmer) I expect my government to collect farmers' reports of acres not only efficiently, but most importantly, effectively. Allowing Crop Insurance Agents to take acreage reports on FSA's behalf will only create a multitude of problems that will result in a waste of taxpayer dollars to correct them. FSA already has EVERYTHING (personnel, equipment, software, GIS, etc.) in place to accept the most accurate acreage report, while at the same time ensuring compliance with all the provisions in any Farm Bill legislation. Crop insurance would require an additional and duplicative system of training, technology, and guidelines to be established ... again, a waste of taxpayer dollars.

The multitude of problems could result in inaccurate or improper updating including, but is not limited to:

- Changes in field boundaries and resulting acreage changes
- Noncompliance with a multitude of USDA required provisions including HELC/WC (sod/swampbuster)
- Changes in the farm operating plan
- Changes in farm owners
- Changes in current contracts on file
- Farms being constituted and resulting in erroneous tracts and units

Most Agents do not realize that if a producer reports his acres and changes the shares on the crops, this in-turn, can create a change in several different program contracts in the FSA office.

Even allowing a producer the choice to either report to FSA or to crop insurance is a huge waste of the Agent's time and the producer's time. The producer will still need to visit the FSA office to update changes that the Agent is unable to handle. Where is the time savings in that?

Agents need to spend their time administering sales, claims, and settlements.

How can anyone face the American public and explain to them that although there is a perfect FSA system in place for producers to report their acres, the Federal government is going to use taxpayer dollars for startup costs for another agency to collect the data that is already being collected?

In addition, FSA deals with a broader clientele than crop insurance. There are, by far, more producers enrolled in FSA programs than those who simply have crop insurance. FSA could easily add and meet the needs of crop insurance the same as the needs of a multitude of other USDA programs and benefits. The old excuse that FSA has a land "tracts" system as compared to crop insurance land "units" system is no longer a problem with the advent of modern technology of computers and software programming. FSA can take acreage and production reports for all USDA purposes to be applied to tracts,

units, or any other measure of land. An example of FSA implementation of modern computing technology already exists with FSA administering the SURE disaster program and with the inclusion of uploading crop insurance settlement data.

I implore you to do the right thing and permit FSA to continue accepting acreage reports for ALL land uses or, better yet, as the only agency to take acreage reports for ALL USDA purposes. That would include the uploading of the data to the Crop Insurance Agents in a timely manner.

Thank you for your time.