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February 13, 2017

USDA/AMS Promotion and Economics Division  
1400 Independence Avenue, SW, Room 0632-0244  
Washington, DC 20250-0244

**RE: AMS-SC-16-0112 PR-A1; AMS-SC-16-0112 PR-B  
Proposed Organic Research, Promotion and Information Order**

To Whom It May Concern:

The [Iowa Organic Association \(IOA\)](http://www.iowaorganic.org) is a non-profit 501(c)3 organization dedicated to the advancement of Iowa's organic food and farming system. IOA was founded in 2006 and serves as an umbrella association to represent all of Iowa's organic farmers, gardeners, food and farm businesses and consumers in building a more sustainable Iowa. Our mission is to advance organic opportunities by fostering education, research, promotion and market development and policy.

In addition, IOA represents the over 900 organic operations certified in the state of Iowa. Iowa ranks sixth nationwide for number of organic farmers. As a commodity state, we are working hard to educate conventional farmers about organic transition so that we may contribute to the domestic demand for organic grain with domestic supply.

**IOA requests that the comment periods for both the Proposed Order and the Referendum Procedures (referenced above), scheduled to close on March 20, 2017, be extended for an additional 90 days, to June 20, 2017.** The Proposed Order and its accompanying referendum procedures are complex, and our board requires more time to thoroughly vet the proposed order as well as educate and poll our stakeholders about the proposed Organic Research, Promotion and Information Order. Because this order will increase the USDA paperwork required from all certified organic entities with the annual documentation of gross receipts, as well as potentially paying into the Order, we request more time to be able to fully analyze, education, and recommend comments on this proposal.

Thank you for your consideration of this extension request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Ausborn", written over a light blue horizontal line.

Scott Ausborn  
Board President