



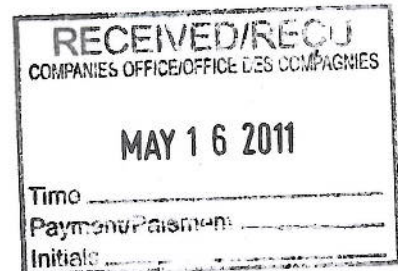
United States
Department of
Agriculture

Grain Inspection,
Packers and Stockyards
Administration

Stop 3601
1400 Independence Ave., SW
Washington, DC 20250-3601

MAY - 9 2011

Mr. Myron Pawlowsky, President
International Association of Commercial Administrators
1010-405 Broadway
Winnipeg, Manitoba
Canada R3C 3L6



Dear Mr. Pawlowsky:

This letter responds to your letter dated April 19, 2011, describing difficulties members of the International Association of Commercial Administrators (IACA) have faced in complying with certain aspects of regulations related to statutory provisions for Clear Title Protection for Purchasers of Farm Products. As you note, use of approved unique identifiers on Effective Financing Statements [EFS] in your central filing data bank and on master lists was introduced in 2006 as an alternative to use of Social Security numbers, to reduce potential identity theft. You report that some states have had difficulty implementing the alternative, and methods adapted by other states vary in format, creating difficulties for users of the system. You also state you believe that most states' master lists support flexible name searches, making use of an identifier number unnecessary. You request that the Department of Agriculture (USDA) recommend to Congress complete removal of the Social Security number or approved unique identifier requirements.

We appreciate this expression of interest on the part of your organization and its members in maintaining and improving this important system. We will take your recommendation under consideration within USDA, but please understand that the current identification method is mandated by statute. Your members may wish to consider making their Congressional representatives aware of their position, since Congress would have to amend the current law.

Sincerely,


J. Dudley Butler
Administrator