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BY:.....

15 July 2005
117 The Parkway
Ithaca, New York 14850-2244

Antitrust Modernization Commission
Attn: Public Comments
1120 G Street, NW Suite 810
Washington, D.C. 20005

Dear Ms. Gaza and Mr. Yarowsky:

My name is Bruce Anderson. I am Emeritus Professor of Business Management and Marketing in the Department of Applied Economics and Management at Cornell University I will attach my vita in my FedEx letter. I have taught a course on cooperatives for over 25 years, and consulted with well over a thousand cooperatives, both in the U.S. and internationally.

First let me say that the Capper-Volstead Act is the envy of the world. I was in China last year, and expect the country may adopting a similar law, depending on political conditions. Also, I was in the Philippines two weeks ago, and met with one of the Congressmen. He mentioned trying to get a similar law there.

Sometimes, I look back and ask myself what is right for humanity and progress in the world. It is my conviction we want people working together. That is what Capper-Volstead stands for. It would be a grave international signal that any thing be changed concerning the Act.

Second, all the Capper-Volstead does is let producers "to work together". My experience is that usually they that do that too well financially, but we keep working on that. (Note the bankruptcies of Farmland Industries and Agway.) So, from an antitrust view I consider cooperatives absolutely no threat to general commerce. Also, look at their market share and business volume. I assure you that you will find no monopolization.

Third, if anything, I would like to see your committee include all cooperatives, producer and buyer-consumer groups under Capper-Volstead, i.e. all marketing, food, housing, health care, day care cooperatives etc, as long as they are truly cooperative - managed by members.

I have went back, and looked at Representative Andrew Volstead's, (U.S. House - Chair of the Judiciary Committee) comments, who was supposedly the real author (1919), of the Capper-Volstead Act. It was not enacted until 1922. The issues still ring true today, but for

more than farmers/producers.

In the entire food and agribusiness industries we are seeing major mergers. Cooperatives provide some level of competition, which was their original purpose.

Also, I hear from all segments of the economy. Cooperatives are the savior of many people.

Here is the bottom line and the reason you do not touch the Capper-Volstead Act: Cooperatives are usually the alternative of last resort for agricultural producers. Often there are no other marketers or they are charging high commissions.

Respectfully,

A handwritten signature in cursive script that reads "Bruce L. Anderson". The signature is written in black ink and is positioned to the right of the word "Respectfully,".

Bruce L. Anderson
Emeritus Professor of
Business Management and Marketing
Department of Applied Economics and Management
Cornell University