

# Regulatory Analysis Form

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REGULATORY  
REVIEW COMMISSION

(1) Agency

Pennsylvania Milk Marketing Board

(2) I.D. Number (Governor's Office Use)

47-11

IRRC Number: 2466

(3) Short Title

Transactions between dealers and customers; Dealer inducements

(4) PA Code Cite

7 Pa. Code Chapter 145

(5) Agency Contacts & Telephone Numbers

Primary Contact: **Keith Bierly, Secretary**  
787-4194

Secondary Contact: **Douglas L. Eberly, Chief Counsel**  
787-4194

(6) Type of Rulemaking (check one)

☒ XX Proposed Rulemaking

☐ Final Order Adopting Regulation

☐ Final Order, Proposed Rulemaking Omitted

(7) Is a 120-Day Emergency Certification Attached?

☒ XX No

☐ Yes: By the Attorney General

☐ Yes: By the Governor

(8) Briefly explain the regulation in clear and nontechnical language.

The principal purpose of the amendments is to prohibit loans made by Board licensed milk dealers to their customers. Section 807 of the Pennsylvania Milk Marketing Law (Law) (31 P.S. § 700j-807) provides that "[n]o method or device shall be lawful whereby milk is bought or received . . . , or sold . . . or delivered . . . , or offered to be bought or received . . . , or sold . . . or delivered . . . , at a price less than the minimum price applicable to the particular transaction . . . ." Milk dealers, in the course of acquiring new customers, sometimes make loans to those customers. Examining those loans to determine if they have the effect of bringing any particular transaction below the minimum price applicable for that transaction raises a myriad of valuation and enforcement issues. Widespread use of loans also has the potential to cause market disruption in some areas of Pennsylvania. In addition, the Board believes that the majority of milk dealers do not want to provide loans to customers, but in many cases the dealers feel that they must make a loan to retain or acquire a customer. The Board believes that prohibiting loans will tend to reduce the potential for market disruption and will lead to improved compliance with the Law's minimum pricing provisions.

(9) State the statutory authority for the regulation and any relevant state or federal court decisions.

**Section 307 of the Law (31 P.S. § 700j-307) provides the Board with the authority to adopt and enforce regulations necessary or appropriate to carry out the provisions of the Law.**

**Section 807 of the Pennsylvania Milk Marketing Law (Law) (31 P.S. § 700j-807) provides that "[n]o method or device shall be lawful whereby milk is bought or received . . . , or sold . . . or delivered . . . , or offered to be bought or received . . . , or sold . . . or delivered . . . , at a price less than the minimum price applicable to the particular transaction . . . ." The Board has found that dealer loans to customers have at least the potential to provide a means for milk to be bought or sold at prices less than Board-established minimums.**

## Regulatory Analysis Form

(10) Is the regulation mandated by any federal or state law or court order, or federal regulation? If yes, cite the specific law, case or regulation, and any deadlines for action.

No

(11) Explain the compelling public interest that justifies the regulation. What is the problem it addresses?

**Section 807 of the Pennsylvania Milk Marketing Law (Law) (31 P.S. § 700j-807) provides that "[n]o method or device shall be lawful whereby milk is bought or received . . . , or sold . . . or delivered . . . , or offered to be bought or received . . . , or sold . . . or delivered . . . , at a price less than the minimum price applicable to the particular transaction . . . ." Milk dealers, in the course of acquiring new customers, sometimes make loans to those customers. Such loans have at least the potential to result in milk being bought and sold at prices below the applicable Board-mandated minimum price. Widespread use of loans also has the potential to cause market disruption and destructive competition and in some areas of Pennsylvania. In addition, the Board believes that the majority of milk dealers do not want to provide loans to customers, but in many cases the dealers feel that they must make a loan to retain or acquire a customer. The Board believes that prohibiting loans will tend to reduce the potential for market disruption and will lead to improved compliance with the Law's minimum pricing provisions. The Board believes that it is in the public interest to ensure the greatest compliance possible with the Law's minimum pricing provisions.**

(12) State the public health, safety, environmental or general welfare risks associated with nonregulation.

**Increasing use of loans from dealers to customers to secure or retain business has the potential to cause market disruption and destructive competition, particularly as those loans are used to make sales below the applicable Board-established minimums. One benefit that results from the Law's minimum pricing provisions is an unparalleled diversity of milk processors, providing a wide range of choices for Pennsylvania milk consumers. The large number of processors in Pennsylvania also ensures Pennsylvania consumers of the highest quality and freshest milk available. The use of loans to circumvent the minimum pricing provisions has the potential to cause market disruption and destructive competition, eventually to the detriment of Pennsylvania's milk consumers.**

(13) Describe who will benefit from the regulation. (Quantify the benefits as completely as possible and approximate the number of people who will benefit.)

**All of Pennsylvania's milk consumers will benefit from this regulation, as noted in item 12 above. The regulation will also eliminate a source of potential market disruption and destructive competition, benefiting milk dealers doing business in Pennsylvania and their customers.**

Regulatory Analysis Form

(14) Describe who will be adversely affected by the regulation. (Quantify the adverse effects as completely as possible and approximate the number of people who will be adversely affected.)

The only persons who will be adversely affected by the regulation are those customers of milk dealers who have been receiving below market value loans. The number of these customers varies widely month-to-month based on a number of factors, including the wholesale price of milk and business decisions of milk dealers and their customers.

(15) List the persons, groups or entities that will be required to comply with the regulation. (Approximate the number of people who will be required to comply.)

There are approximately 64 fluid milk processors and former fluid milk processors licensed by the Board as milk dealers who will be required to comply with the regulation.

(16) Describe the communications with and input from the public in the development and drafting of the regulation. List the persons and/or groups who were involved, if applicable.

The Board conducted a roundtable meeting on June 29, 2004, to generally discuss the issues surrounding loans made by milk dealers to their customers. Among the attendees were the Pennsylvania Association of Milk Dealers, Pennsylvania Food Merchants' Association, Pennsylvania Farm Bureau, Dean Foods Company, Lehigh Valley Dairies, Rutter's Dairy, Pocono Mountain Dairy, Ritchey's Dairy, Galliker's Dairy, Vale Wood Farms, Crowley Foods, Upstate Farms Cooperative, and Land O' Lakes. The Board learned at this roundtable meeting that the general consensus in the industry was that loans by dealers to their customers should be prohibited. A first draft of the regulation was completed following the roundtable meeting. Various drafts were circulated among the interested parties and revised over the course of the next five months.

On December 15, 2004, the Board conducted a public hearing to receive comments on the proposed regulation. The attendees at the public hearing included representatives of the Pennsylvania Association of Milk Dealers, Pennsylvania Food Merchants' Association, Pennsylvania Farm Bureau, Dean Foods Company, Dairy Marketing Services, Lehigh Valley Dairies, Schneider's Dairy, Pennsylvania Department of Agriculture, United Dairy Company, and Land O' Lakes. The Pennsylvania Food Merchants' Association raised the issue of grocery wholesalers making loans to customers in conjunction with the full line of grocery sales to those customers. The proposed amendments address that issue by clarifying that loans made by grocery wholesalers in conjunction with transactions that may include milk sales are not prohibited if the loans are only incidentally related to the milk sales and are not made as an inducement to secure or retain the milk business of the customer.

**Regulatory Analysis Form**

(17) Provide a specific estimate of the costs and/or savings to the regulated community associated with compliance, including any legal, accounting or consulting procedures which may be required.

**The regulated community will incur no costs associated with compliance with the regulation.**

**The regulated community may incur some savings, which cannot be specifically estimated, as a result of being prohibited from making loans, which in some cases would be below market value or non-performing.**

(18) Provide a specific estimate of the costs and/or savings to local governments associated with compliance, including any legal, accounting or consulting procedures which may be required.

**There will be no additional costs and/or savings to local governments associated with compliance, including legal, accounting, or consulting procedures, with this regulation.**

(19) Provide a specific estimate of the costs and/or savings to state government associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required.

**There will be no costs and/or savings to state government associated with implementation of the regulation. The Board's enforcement staff will merely re-direct enforcement efforts to other issues.**

## Regulatory Analysis Form

(20) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY	FY +1	FY +2	FY +3	FY +4	FY +5
<b>SAVINGS:</b>	\$	\$	\$	\$	\$	\$
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Savings</b>	\$0	\$0	\$0	\$0	\$0	\$0
<b>COSTS:</b>						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Costs</b>	\$0	\$0	\$0	\$0	\$0	\$0
<b>REVENUE LOSSES:</b>						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Revenue Losses</b>	\$0	\$0	\$0	\$0	\$0	\$0

(20a) Explain how the cost estimates listed above were derived.

The Board believes that that there will be no costs or revenue losses by the regulated community, local government, or state government by prohibiting loans from milk dealers to their customers. The Board also believes that no savings will be incurred by the regulated community, local government, or state government by prohibiting loans from milk dealers to their customers.

### Regulatory Analysis Form

(20b) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
	\$0	\$0	\$0	\$0

(21) Using the cost-benefit information provided above, explain how the benefits of the regulation outweigh the adverse effects and costs.

**The benefits of the regulation lie in the elimination of the potential for market disruption and destructive competition by ensuring compliance with Board-established minimum prices. The minimum price provisions of the Law ultimately benefit Pennsylvania milk consumers by assuring them access to the greatest possible variety of the freshest possible fluid milk at more reasonable prices than what might otherwise occur. The Board believes that the regulation will result in no adverse effects or costs; rather, the adverse effects and costs will result from non-regulation of dealer loans to their customers.**

(22) Describe the nonregulatory alternatives considered and the costs associated with those alternatives. Provide the reasons for their dismissal.

**There are no non-regulatory alternatives available to prevent the market disruption and destructive competition that could result from increasing use of loans by milk dealers to secure or retain milk business.**

(23) Describe alternative regulatory schemes considered and the costs associated with those schemes. Provide the reasons for their dismissal.

**There are no alternative regulatory schemes to prohibit dealer loans to their customers to prevent the market disruption and destructive competition that could result from increasing use of such loans.**

### Regulatory Analysis Form

(24) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulation.

No.

(25) How does this regulation compare with those of other states? Will the regulation put Pennsylvania at a competitive disadvantage with other states?

**Pennsylvania's Milk Marketing Law is somewhat unique. The Board has not identified any other states that prohibit loans from milk dealers to their customers; however, only two other states have a milk regulatory program as comprehensive as Pennsylvania's.**

**The regulation will not put Pennsylvania at a competitive disadvantage with other states, as the regulation will only be enforced on transactions that take place in Pennsylvania.**

(26) Will the regulation affect existing or proposed regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No.

(27) Will any public hearings or informational meetings be scheduled? Please provide the dates, times, and locations, if available.

**The Board held an informal roundtable discussion on June 29, 2004. The Board also held a public hearing on December 15, 2004. No further public hearings or further informational meetings with the industry are contemplated.**



### Regulatory Analysis Form

(28) Will the regulation change existing reporting, record keeping, or other paperwork requirements? Describe the changes and attach copies of forms or reports which will be required as a result of implementation, if available.

No.

(29) Please list any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, elderly, small businesses, and farmers.

**The regulation does take into account the particular needs of grocery wholesalers who are also licensed by the Board as milk dealers. Grocery wholesalers sometimes make loans to their customers in conjunction with transactions involving the full range of items sold by grocery wholesalers, including milk. To the extent those loans are only incidentally related to milk sales and are not made to secure or retain the milk business of a customer, the proposed regulation does not prohibit them.**

(30) What is the anticipated effective date of the regulation; the date by which compliance with the regulation will be required; and the date by which any required permits, licenses or other approvals must be obtained?

**The anticipated effective date of the regulation is no later than September 1, 2005. Compliance with the regulation will be required as of the effective date. No additional permits or licenses will be required.**

(31) Provide the schedule for continual review of the regulation.

**This regulation will be reviewed on an ongoing basis to ensure that the intent of the regulation is being met.**

**FACE SHEET  
FOR FILING DOCUMENTS  
WITH THE LEGISLATIVE REFERENCE BUREAU**  
(Pursuant to Commonwealth Documents Law)

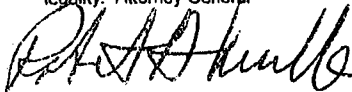
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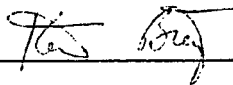
Copy below is hereby approved as to form and  
legality: Attorney GeneralBy: \_\_\_\_\_  
(Deputy Attorney General)

FEB 22 2005

DATE OF APPROVAL

☐ Check if applicable  
Copy not approved. Objections attached.Copy below is hereby certified to be true and correct copy of  
a document issued, prescribed or promulgated by:PA Milk Marketing Board  
(AGENCY)DOCUMENT/FISCAL NOTE NO. 47-11DATE OF ADOPTION February 2, 2005

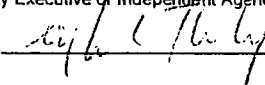
BY

TITLE Secretary

EXECUTIVE OFFICER CHAIRMAN OR SECRETARY

Copy below is hereby approved as to form and  
legality Executive of Independent Agencies

BY

February 2, 2005

DATE OF APPROVAL

~~(Deputy General Counsel)~~  
(Chief Counsel - Independent Agency)  
(Strike inapplicable title)☐ Check if applicable. No Attorney General  
Approval or objection within 30 days after  
submission.2005/03/04 15:08  
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## **PENNSYLVANIA MILK MARKETING BOARD**

### **(7 Pa. Code Chapter 145)**

#### **Transactions between dealers and customers; Dealer inducements**

The Pennsylvania Milk Marketing Board (Board) proposes to amend 7 Pa. Code §§ 145.11, 145.21, 145.25, and 145.26 (relating to transactions between dealers and customers and dealer inducements) to read as set forth in Annex A.

#### ***Purpose of proposed amendments***

The principal purpose of the amendments is to prohibit loans made by Board licensed milk dealers to their customers. Section 807 of the Pennsylvania Milk Marketing Law (Law) (31 P.S. § 700j-807) provides that "[n]o method or device shall be lawful whereby milk is bought or received . . . , or sold . . . or delivered . . . , or offered to be bought or received . . . , or sold . . . or delivered . . . , at a price less than the minimum price applicable to the particular transaction . . . ." Milk dealers, in the course of acquiring new customers, sometimes make loans to those customers. Examining those loans to determine if they have the effect of bringing any particular transaction below the minimum price applicable for that transaction raises a myriad of valuation and enforcement issues. Widespread use of loans also has the potential to cause market disruption in some areas of Pennsylvania. In addition, the Board believes that the majority of milk dealers do not want to provide loans to customers, but in many cases the dealers feel that they must make a loan to retain or acquire a customer. The Board believes that prohibiting loans will tend to reduce the potential for market disruption and will lead to improved compliance with the Law's minimum pricing provisions.

#### ***Summary of proposed amendments***

The Board currently enforces regulations regarding transactions between milk dealers and their customers and regulations regarding dealer inducements to customers and potential customers.

Section 145.11 (7 Pa. Code § 145.11) of the Board's regulations currently prohibits dealers from providing "financial accommodations" to wholesale customers by, in general, guaranteeing the payment of any obligation of the customer. The amendment would also prohibit milk dealers from providing "financial accommodations" to customers by lending the customers money or by paying any obligation of the customer.

Section 145.21 (7 Pa. Code § 145.21) of the Board's regulations currently prohibits milk dealers from giving money, among other items, to a customer or prospective customer as an inducement for soliciting or securing the business of that customer or prospective customer. The amendment would also prohibit milk dealers from lending money to a customer or prospective customer as an inducement to solicit or secure the business.

Section 145.25 (7 Pa. Code § 145.25) of the Board's regulations currently provides that loans will be deemed an "extension of credit" as that term is used in Section 807 of the Law. The amendment would repeal this section of the regulations. As noted above, examining loans to determine if they result in sales below the minimum price applicable to a particular transaction raises issues regarding the value and legitimacy of the loan. In addition, the Board is becoming increasingly concerned that widespread use of loans by milk dealers has the potential to cause market disruption in some areas of Pennsylvania. Repealing this section is also necessary for consistency with the other amendments, as they would prohibit loans; if loans are prohibited, there is no reason to deem them extensions of credit.

Section 145.26 (7 Pa. Code § 145.26) of the Board's regulations prohibits extensions of credit to most wholesale customers beyond 30 days from the date of invoice. This section also provides that after 30 days, dealers must place such customers on a cash basis. At a public meeting dealing with the loan issue, some dealers expressed concern over not being able to secure payment from these cash customers if loans were prohibited. To clarify that dealers may make arrangements to secure those payments, the amendment provides that dealers with customers on a cash payment schedule pursuant to the terms of section 145.26 may secure those payments with a promissory note, a lien, or by some other method.

During preliminary discussions and the public meeting regarding these proposed amendments, the Pennsylvania Food Merchants' Association raised the issue of grocery wholesalers. The Board does license some grocery wholesalers as milk dealers. Some of the grocery wholesalers, in conjunction with supplying customers with the complete line of groceries including milk, do make loans to those customers, whether they be wholly-owned subsidiaries, franchisees, affiliates, or non-affiliated customers. Language was added to sections 145.11, 145.21, and 145.26 to clarify that loans made by grocery wholesalers, to the extent such loans are not inducements related to acquiring or retaining the milk business of any customers, are not prohibited.

Dean Foods Company also expressed some concern during the preliminary discussions that the prohibition on dealer loans could cause competitive issues outside Pennsylvania if the Board enforced the prohibition on transactions that take place outside Pennsylvania. The Board recognizes that it may not enforce the Law or regulations on transactions that take place outside Pennsylvania and has no intention or desire to enforce its regulations on transactions that take outside Pennsylvania.

#### ***Statutory authority***

Section 307 of the Law (31 P.S. § 700j-307) provides the Board with the authority to adopt and enforce regulations necessary or appropriate to carry out the provisions of the Law.

#### ***Public hearing***

On December 15, 2004, the Board, after due notice, conducted a public hearing to receive comments on the proposed amendments. Among the attendees were representatives of the Pennsylvania Association of Milk Dealers, Pennsylvania Food Merchants' Association, Pennsylvania Farm Bureau, Dean Foods Company, Dairy Marketing Services, Lehigh Valley Dairies, Schneider's Dairy, Pennsylvania Department of Agriculture, United Dairy Company, and Land O' Lakes. The Pennsylvania Food Merchants' Association raised the issue of grocery wholesalers making loans to customers in conjunction with the full line of grocery sales to those customers. The proposed amendments address that issue by clarifying that loans made by grocery wholesalers in conjunction with transactions that may include milk sales are not prohibited if the loans are only incidentally related to the milk sales and are not made as an inducement to secure or retain the milk business of the customer.

The Board also held a public meeting on June 29, 2004, to generally discuss the issues surrounding loans made by dealers to customers. Among the attendees were the Pennsylvania Association of Milk Dealers, Pennsylvania Food Merchants' Association, Pennsylvania Farm Bureau, Dean Foods Company, Lehigh Valley Dairies, Rutter's Dairy, Pocono Mountain Dairy, Ritchey's Dairy, Galliker's Dairy, Vale Wood Farms, Crowley Foods, Upstate Farms Cooperative, and Land O' Lakes. The first draft of the proposed amendments was written as a result of the discussion and comments at that public meeting.

#### ***Fiscal impact***

The Board believes that adoption of these amendments will eliminate the potential for market disruption, and hence the potential for negative fiscal impact on at least some dealers and their customers.

The amendments should also have a positive fiscal impact on the Board in that resources spent examining and valuing loans made by dealers to customers will be spent on other enforcement priorities.

#### ***Paperwork requirements***

None.

#### ***Effective date; sunset date***

The amendments will become effective upon publication in the *Pennsylvania Bulletin* as final rulemaking. There is no sunset date.

#### ***Regulatory review***

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), a copy of this proposal was submitted on \_\_\_\_\_ to the Independent Regulatory Review Commission (IRRC) and to the chairpeople of the House and Senate Committees on Agriculture and Rural Affairs. In addition to submitting the proposed amendments, the Board has provided IRRC and the committees with a copy of a detailed regulatory analysis form. A copy of this material is available to the public upon request.

If IRRC has objections to any portion of the proposed amendment, it will notify the Board within 30 days of the close of the public comment period. The notification shall specify the regulatory review criteria which have not been met by that portion. The Regulatory Review Act specifies detailed procedures for review by the Board, the General Assembly, and the Governor of objections raised before final publication of the regulations.

***Public Comment***

Interested persons are invited to submit written comments, suggestions, or objections concerning the proposed amendments to Chief Counsel, Pennsylvania Milk Marketing Board, 2301 North Cameron Street, Harrisburg, PA 17110, within 30 days following publication in the *Pennsylvania Bulletin*.

Boyd E. Wolff  
*Chairman*

## ANNEX A

### § 145.11. Financing.

Milk Dealers and their affiliates, subsidiaries, or representatives thereof shall not provide financial accommodations for a wholesale customer by lending money to the customer, or by paying or guaranteeing the payment of any obligation of the customer, or by acting as a cosigner on a promissory note or other obligation of said the customer, or by depositing money or collateral with a third party, person or organization which will lend money or extend credit to a wholesale the customer. The provisions of this section shall not apply to transactions between grocery wholesalers and their subsidiaries, affiliates, franchisees, or wholesale customers to the extent such transactions occur in the normal course of the grocery wholesaler's business and are only incidentally related to acquisition or retention of the fluid milk business of the subsidiary, affiliate, franchisee, or wholesale customer.

### § 145.21. Giveaways.

(a) Milk dealers and their affiliates, subsidiaries, or representatives thereof shall not give or lend any milk, milk products, money, article, prize, award, or any other item to a customer or a prospective customer, as an inducement for the purpose of soliciting or securing business or making collections for said dealer, unless such person is a regular employee of the dealer. The provisions of this section shall not apply to transactions between grocery wholesalers and their subsidiaries, affiliates, franchisees, or wholesale customers to the extent such transactions occur in the normal course of the grocery wholesaler's business and are only incidentally related to acquisition or retention of the fluid milk business of the subsidiary, affiliate, franchisee, or wholesale customer.

(b) Subsection (a) of this section shall not apply to persons employed by "Welcome Wagon Service," any similar organization, any accredited collection agency, or attorneys retained for collection purposes.

### § 145.25. ~~Loans and credit; wholesale customers.~~

Loans by a dealer, or an affiliate, subsidiary, or representative thereof to wholesale customers of fluid milk shall be deemed an extension of credit as that term is used under section 807 of the act (31 P. S. § 700j-807), and are prohibited insofar as an extension of credit is prohibited under such section.

### § 145.26. Extension of credit to wholesale customers.

(a) Extension of credit to a wholesale customer, excluding a hospital, school or government agency, beyond 30 days from the date of invoice is prohibited.

(1) The invoice from dealers to customers must be rendered no less frequently than once a month.

(2) If a customer fails to pay an invoice within 30 days, the dealer must then place that customer on a cash basis.

(b) For the purpose of this section, cash payment basis may, at the option of the dealer, be interpreted to mean weekly payments for the delivery of the past weeks plus not less than 4% of the past due account to be received by the dealer, on a regular and continuing weekly basis until the customer has reduced the past due balance below the maximum 30-day credit limitation. A dealer who has placed a customer on a cash payment basis under the provisions of this section may, with approval of the Board, require such customer to execute a promissory note in favor of the dealer, or to grant the dealer a lien on assets of the customer, or to otherwise secure payment of the past due balance to the dealer. Such dealer shall immediately notify the Board of the full details of any such action taken to secure the payment of a past due balance under this section.

(c) The provisions of this section shall not apply to transactions between grocery wholesalers and their subsidiaries, affiliates, franchisees, or wholesale customers to the extent such transactions occur in the normal course of the grocery wholesaler's business and are only incidentally related to acquisition or retention of the fluid milk business of the subsidiary, affiliate, franchisee, or wholesale customer.



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TRANSMITTAL SHEET FOR REGULATIONS SUBJECT TO THE REGULATORY REVIEW ACT

I. D. NUMBER: 47-11  
SUBJECT: 7 Pa. Code Chapter 145 – Transactions between dealers and customers  
AGENCY: Milk Marketing Board

# 2466

TYPE OF REGULATION

XX Proposed Regulation  
\_\_\_\_\_ Final Regulation with Notice of Proposed Rulemaking Omitted  
\_\_\_\_\_ Final Regulation  
\_\_\_\_\_ 120-day Emergency Certification of the Attorney General  
\_\_\_\_\_ 120-day Emergency Certification of the Governor

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FILING OF REGULATION

<u>DATE</u>	<u>SIGNATURE</u>	<u>DESIGNATION</u>
3-4-05	<u><del>Cecilia</del> Sandy Attland</u>	<u>HOUSE COMMITTEE</u>
3/4/05	<u>[Signature]</u>	Agriculture & Rural Affairs
3-4-05	<u>Cecilia Boyer</u>	<u>SENATE COMMITTEE</u>
03/04/05	<u>Judy Metz Eagle</u>	Agriculture & Rural Affairs
3/4/05	<u>[Signature]</u>	INDEPENDENT REGULATORY REVIEW COMMISSION
2-7-05	<u>Mary Mummert</u>	ATTORNEY GENERAL
3/4/05	<u>C. Lee [Signature]</u>	LEGISLATIVE REFERENCE BUREAU