Testimony

on behalf of the

National Cattlemen's Beef Association

with regard to

Reviewing Current Issues in Food Safety

submitted to the

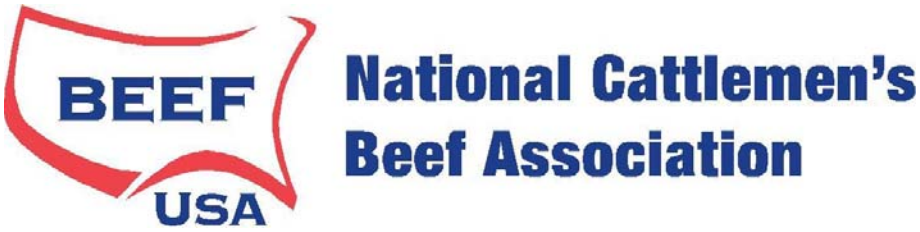
United States House of Representatives – House Committee on Agriculture

The Honorable Collin Peterson, Chairman

submitted by

Dr. Sam Ives, DVM, Ph.D.
Director of Veterinary Services and Associate Director of Research
Cactus Feeders, Ltd.

July 16, 2009
Washington, DC



Chairman Peterson, Ranking Member Lucas and Members of the Committee, I'm Sam Ives and I am the Director of Veterinary Services and Associate Director of Research for Cactus Feeders. Cactus Feeders is headquartered in Amarillo, Texas and we have nine large-scale cattle feedyards across the Texas High Plains and Southwest Kansas where we produce 1,000,000 head of cattle for slaughter annually. A subsidiary to our feeding operations includes three ranches in Texas and New Mexico. The ranches produce 30,000 stocker calves annually and maintain 2,000 mother cows. My responsibilities are focused on animal health and well-being of the cattle in our operations. These responsibilities include advising the feeding and ranching operations on best practices for preventing, controlling, and treating diseases that occur in the cattle during the feeding period. Much time is spent training employees and evaluating our health programs to assure that we are providing cattle that will become a safe and wholesome meat product for our consuming public. Many of the recommendations used in our operations are supported by studies conducted at Cactus Research which I manage along with Dr. Spencer Swingle. Cactus Research is managed as a 12,000 head research feedlot in the Texas panhandle. Together Dr. Swingle and I are responsible for investigating and coordinating sponsored and internal research studies including diet formulation, growth promoting technologies, direct-fed microbials, feed additives, the incidence and control of important food safety pathogens, and medications for control and treatment of cattle diseases.

I appreciate the opportunity to represent the National Cattlemen's Beef Association (NCBA) at today's hearing to discuss the beef industry's commitment to beef safety. NCBA is the oldest and largest national trade association for cattle producers and represents over 230,000 cattle producers through direct membership and state and breed affiliates. Cattlemen are committed to producing the safest, most wholesome, nutritious and affordable beef products in the world. There is no question that the United States has the safest food supply in the world and other countries consider the U.S. the "gold standard." Science is a critical component of the beef industry and through science-based improvements in animal genetics, management practices, nutrition and health, beef production per cow has increased from 400 pounds of beef in the mid-1960s to 585 pounds of beef in 2005[1]. As beef producers we have our work cut out for us in order to feed our ever growing population. In 1960 there were 3.9 million farms feeding a U.S. population of 183 million and in 2005 there were 2.1 million farms feeding an estimated population of 296 million – a population increase of 61 percent[2]. In 1960 the average farmer fed 25.8 people. Today's American farmer feeds about 144 people worldwide[3]. Cattlemen will continue to increase efficiencies based on science in order to produce high-quality beef with fewer resources being consumed. In addition, our industry continues to focus on our long-term efforts to improve our knowledge and ability to produce healthy cattle, which are the foundation of a safe food supply.

Since 1993, cattle producers have invested more than $27 million in beef safety research and the beef industry as a whole spends approximately $350 million every year on beef safety. It is important to note that **everyone** plays an important role in the safety of beef. It starts with producers raising healthy cattle, and everyone who plays a role in the production chain is committed to producing safe beef products. Consumers also play a critical role to ensure the safety of their meat products by using safe storage, handling and preparation techniques.

1. Cattle-Fax: http://www.beefusa.org/uDocs/cattlenumbersandbeefproduction347.pdf
2. NASS: http://www.nass.usda.gov:8080/QuickStats/PullData_US.jsp
3. ACA: http://www.agday.org/media/agfactsheet.htm

All beef is subject to strict government oversight by the U.S. Department of Agriculture (USDA) and every meat processing facility undergoes on-going USDA inspection. The inspection process includes review of their Hazard Analysis Critical Control Point plans also known as HACCP plans. HACCP plans were pro-actively developed by the food industry as a method to identify potential hazards and prevent them. In 1996, USDA's Food Safety and Inspection Service (FSIS) enacted a rule requiring HACCP plans for all beef processing plants.

In 1997, the Beef Industry Food Safety Council (BIFSCo) was formed to coordinate a broad effort to solve pathogen issues, and to focus on research and consumer education. Representatives from all segments of the beef industry belong to BIFSCo and work together under the founding principles that safety is a non-competitive issue to develop industry-wide, science-based strategies to address safety challenges, particularly *E. coli* O157:H7. Cattlemen and the entire beef industry have dedicated significant time and resources to a variety of research areas including building our knowledge of *E. coli* O157:H7 by identifying where, why and how it survives from pre- to post- harvest; the relationship between the live animal and the pathogen in order to develop pre-harvest interventions; and the impact that production practices, processing systems and interventions have on the pathogens.

NCBA continues to evaluate how to optimize food safety systems not only for the current safety challenges but also for any potential future ones. Cattle producers and our partners will continue to dedicate time and resources to reduce the incidence of pathogens and other food safety issues. The beef industry and our government share the common goal of producing safe beef products. With the current budget and economic situation there has never been a more important time for our government and the industry to work together to achieve this goal.

NCBA supports the establishment of realistic food safety objectives designed to protect public health to the maximum extent possible. It is vital that the objectives be based on sound science with the realistic understanding that even under the best science-based operating procedures achieving zero risk is not possible. However, utilizing science-based principles and validating interventions used throughout the process will effectively control the associated risks of pathogens like *E. coli* O157:H7. In addition, it is more important to focus resources on the validation of process controls rather than testing as a means to protect public health. Beef packing plants and processors vary in size and design, and their safety plans must be tailored to their set-up. Nearly 100 percent of beef establishments use one or more of the post-harvest safety interventions the beef industry has helped research, implement and validate.

NCBA's members remain committed to beef safety, we take a lot of pride in the amount of time and resources we have dedicated to making beef an even safer product. As Congress continues to debate food safety legislation we encourage you to continue working with all relevant stakeholders to increase efficiencies and the effectiveness of our food safety system. There are several food safety bills being discussed that would result in unintended consequences for cattlemen as well as other livestock and poultry producers.

As legislation is developed, it is important to understand the Food and Drug Administration's (FDA) role in food safety and how their role differs from USDA's Food Safety Inspection Service (FSIS). H.R. 2749 passed the House Energy and Commerce Committee on June 17, 2009. There are several sections of this bill of concern to cattle producers and we appreciate the Energy and Commerce Committee's willingness to discuss and learn more about how the meat and poultry industries are regulated. We understand the intent of the Committee is to exempt livestock and poultry from this bill as meat and poultry products are already regulated by USDA with the authority granted to them by Congress in the Federal Meat Inspection Act, the Poultry Inspection Act and the Egg Products Inspection Act.

However, we are concerned the current bill language does not go far enough to ensure Congressional intent. The bill must contain clear legislative language ensuring that FDA is not granted the authority to regulate livestock on-farm by mandating production standards for cattlemen across the country. Live animals are not "food" until the point of processing, which is why this bill needs to clarify that the FDA does not have regulatory authority on our farms, ranches or feedlots. Cattle producers support language that explicitly excludes livestock and poultry from the definition of "food" under this bill and the Federal Food Drug and Cosmetic Act (FFDCA). This important change is essential to resolve the ambiguity to keep the more than century old and successful animal health and meat, poultry, and egg inspection a functioning partnership between USDA and State authorities.

The exemption of livestock and poultry from "food" would also clarify the recordkeeping requirements and their application to "food". Under the FFDCA recordkeeping requirements apply to "food," the FFDCA also exempts "farms" but this legislation eliminates that exemption. It is our concern the "livestock" exemption from the definition of "farm" in this bill is not clear. The exemption of "livestock" should also apply to "food" as the recordkeeping requirements of this bill are applicable to "food". We urge the Committee to exclude livestock from the definition of "food" under the FFDCA and modify the facility requirements of this bill to ensure "preventative controls" and "inspections" requirements of this bill are not applicable to USDA regulated facilities. In addition, cattle producers are concerned with the definition of "facility" as the "preventative controls" and "inspections" requirements of this bill will apply to USDA facilities with FDA operations. For example, a beef slaughter facility with a rendering operation would be subject to FDA preventative controls and inspections for all aspects of their operations. This is unnecessary and duplicative as USDA has regulatory authority now. We ask the Committee to modify the definition of "food" and to modify the facility requirements of this bill to ensure "preventative controls" and "inspections" requirements of this bill are not applicable to USDA regulated facilities. H.R. 2749 raises concerns about the treatment of state inspected facilities as the bill only exempts "official establishments" as defined by this legislation. This definition refers to the "regulations promulgated under this subchapter" and does not include state inspected facilities. Many beef producers, especially in rural areas, rely on state inspected facilities when processing their cattle. State inspected facilities are not "official establishments" and the definition needs to be expanded to include these facilities in the exemption.

Section 133 of the bill grants FDA with another redundant authority regarding quarantine of a geographical area where food presents serious adverse health consequences. This new responsibility of FDA is unnecessary, confusing and will disrupt the decades of cooperative efforts between USDA and state authorities. Currently, under the authorities of the Animal Health Protection Act (AHPA), USDA can impose a federal quarantine for animal health reasons when they deem necessary and USDA works very closely with State agencies. Additionally, under AHPA statute USDA must provide indemnity to affected producers when the federal government "takes" an animal. In this bill FDA would not be required to pay indemnity or even have a qualified reason to extend the quarantine to the live animal area. USDA has the expertise, resources and current regulatory authority to impose an animal health quarantine, and granting this authority to FDA is unnecessary. As pointed out in the full committee markup this provision would extend to retailers and there is no indication in the bill as to how the quarantine would be removed once put into place. As written this provision creates confusion between the roles of USDA and FDA and needs to be thought through carefully so there are not any unintended consequences created by this bill. Again, specifically exempting livestock and poultry in these new regulations would eliminate duplication into current USDA authority.

We appreciate the Energy and Commerce Committee working with the livestock groups to address some of the duplicative and unnecessary regulatory authority this bill grants the FDA. We look forward to working with both the Energy and Commerce and Agriculture Committees to add clarifying language to ensure there is not any confusion as to Congress' intent of this bill.

While I have this opportunity to address the Committee on food safety, I would like to discuss several topics that are being linked to the food safety debates. First is the misconception that an animal identification system is a necessary component for food safety. Animal identification programs are tools to help monitor and trace disease in the event of an animal health emergency. Animal identification systems do not enhance food safety, nor were they ever intended to. In addition, animal identification systems do not prevent animal disease; they are only a tool to help trace and contain them. Producers currently utilize animal identification for herd management, genetic improvement and as a positive tool for their operations' marketing program.

Another topic that is receiving a lot of interest from the media and activist groups is the use of antibiotics in the beef industry. Animal health and well-being are top priorities for cattle producers across the country. Without healthy animals, we do not have healthy food for American families, so we judiciously utilize important tools like vaccines, antimicrobials, and other drugs to control disease, treat disease, and provide a higher quality of life for our cattle while keeping the food supply safe. Additionally, all products approved by FDA for use in food producing animals must first pass significant human food safety benchmarks. It is also important to recognize that animal drugs go through a rigorous, science-based testing process before they are approved for use. FDA, USDA, veterinarians, animal health companies, producer organizations, and other stakeholders have implemented several layers of human health protections. The issue of antimicrobial resistance is very concerning to cattle producers. To date extensive international research on the topic of antimicrobial resistance shows no link between antimicrobial use in

livestock and antimicrobial resistance in humans. NCBA producers and The Beef Checkoff proactively work to increase our knowledge of antimicrobial resistance in both animals and humans. We encourage and advocate for judicious use of all medications. In fact, NCBA producer-made policy supports the *Producer Guidelines for Judicious Use of Antimicrobials* which have been in place since 1987. In addition, NCBA participates in the Codex Alimentarius Task Force on Antimicrobial Resistance.

Antimicrobial resistance is not a black and white issue. It is a multi-faceted and extremely complex issue that cannot be solely focused on the use of drugs in animal agriculture. Unfortunately, animal agriculture has been a primary target in this fight, with little or no consideration given by the public to the use, misuse, and mishandling of human drugs by the general population. To ensure that the issue of antimicrobial resistance is properly addressed, it is imperative that we gather accurate, appropriate, and complete data to identify any problems and all contributing factors. To date, only limited data exists. These data need to be gathered and scientifically evaluated without bias or a pre-determined agenda before any further action is taken by Congress.

Cattle producers have a long history of proactively providing solutions to issues when science-based evidence shows there is an issue that needs to be addressed. Again, to date there is no scientific evidence linking the judicious use of antimicrobials in the beef industry to antimicrobial resistance in humans. The international scientific community continues to actively research and discuss this issue. It is important that we have strong conclusive science-based information before any legislative actions are taken that could impact the health of our animals and food supply.

In closing, I would like state again, that the U.S. has the safest food supply in the world, which is an achievement worth noting. The beef industry will continue to dedicate time and resources to address food safety issues to ensure the U.S. maintains the safest food supply in the world. It is imperative for our government to use sound science when evaluating the effectiveness of our food safety systems, and to realize the differences between FDA's and USDA's regulatory authority of food safety. Science-based intervention and management strategies coupled with safe food handling techniques, will help our industry maintain its goal of providing a safe, high-quality product for the consumer. Everyone plays an important role in food safety and our industry will continue our research and educational outreach efforts to consumers.

I appreciate the opportunity to testify today about the beef industry's role in food safety and some of our areas of concern with H.R. 2749. Cattle producers are concerned that unnecessary duplication of USDA's regulatory authorities will undermine our common goal of creating a more effective and efficient food safety system. We are happy to provide additional information and look forward to working with both the Energy and Commerce and Agriculture Committees to clarify some of the provisions so there is not any misunderstanding of Congressional Intent.

Curriculum Vitae

Samuel E. Ives, D.V.M., Ph.D.

Cactus Feeders, Ltd.
Cactus Research, Ltd.

EDUCATION

Kansas State University:

- **Doctor of Philosophy** – Ruminant nutrition: Dissertation: Ruminal metabolic orders and disorders of feedlot cattle – 2002
- **Doctor of Veterinary Medicine** – 1990
- **Bachelor of Science in Agriculture** – 1988

EXPERIENCE

Cactus Feeders, Ltd.:

- **Associate Director of Research,** September 2005 to present
  - ❖ Manage a 12,000 head cattle research feedlot
  - ❖ Investigator/coordinator for sponsored and internal research studies
    - o Medications for treatment or control of BRD
    - o Growth promoting technologies
    - o Direct fed microbials
    - o Cattle growth investigations
    - o Antimicrobial resistance related to feed additive usage
    - o Incidence of important food safety pathogens

- **Director of Veterinary Services,** October 2004 to present
  - ❖ Oversee the animal health and welfare programs for 10 feedyards and over 1,000,000 head annually

Pfizer Animal Health:

- **Senior Technical Services Veterinarian**, Feedlot Veterinary Operations – April 2003 to October 2004
  - ❖ Customer support around the use of Pfizer products in the cattle feedlot and stocker sectors.
- **Managing Technical Services Veterinarian**, Consultant Manager, US Drug Safety – April 2002 to April 2003
  - ❖ Managed a group of 3 veterinarians that reported adverse event complaints received from customers around the use of Pfizer cattle product portfolio
- **Research Scientist III**; Clinical Development, Lee's Summit – May 2001 to March 2002
  - ❖ Developing and assisting in phase IIIb and IV study protocols, monitoring, and reporting duties
- **Cattle Pharmoco-vaccinovigilance consultant** - 1997 to 2001

Kansas State University:

- **Assistant Professor (College of Veterinary Medicine) Nov. 2000 – May 2001**
  - ❖ Food animal ambulatory responsibilities – Stocker and Feedlot cattle
    - o Provided instruction to senior veterinary students in comprehensive herd health management of stocker and feedlot clients.
  - ❖ Clinical Nutrition – Course coordinator and lectured for ruminant nutrition section
- **Graduate Assistant (Research)** 1997 – 2000
  - ❖ Research projects completed:
    - o In vitro evaluation of semduramicin, virginiamycin, or oxytetracycline alone or in combination on lactic acid and VFA production in ruminal fluid.
    - o Comparative potency of two virginiamycin premixes for altering in vitro ruminal fermentation and a comparison with the potency of mycelial semduramicin.
    - o Effects of dietary fat and ciliate protozoa defaunation on subacute acidosis in steers.

Symbion, Inc.: Abilene, KS 1999-2000

- Canine reproductive services
  - ❖ Canine semen collection and freezing services
  - ❖ Surgical artificial insemination services
    - o Timing of estrous using progesterone and vaginal cytology
- General small animal medicine and surgery

Samuel E. Ives, DVM: 1996 - 2000

- Private cattle consultant

Professional Veterinary Services, Inc.: Scott City, KS. 1995 – 1996

- Associate veterinarian

Bear Paw Veterinary Service: Havre, MT. 1992 - 1995

- Owner/manager of practice

All Creatures Veterinary Service: Big Timber, MT. 1991 – 1992

Veterinary Clinic, Inc.: Mexico, MO. Associate Veterinarian 1990 - 1991

- Associate veterinarian

PUBLICATIONS

Alam, J.M., D.G. Renter, S.E. Ives, D.U. Thomson, M.W. Sanderson, L.C. Hollis, T.G. Nagaraja. 2009. Fecal shedding of Salmonella in feedlot cattle treated for apparent respiratory disease. Vet.Res. 39:04.

Platt, T.M. G.H. Loneragan, H.M. Scott, B. Norby, D.U. Thomson, M.S. Brown, S.E. Ives, M.M. Brashears. 2008. Antimicrobial drug susceptibility of enteric bacteria recovered from feedlot cattle in response to chlortetracycline administration. Am J Vet Res. 69:988-96.

Ives, S.E., T.A. Yazwinski, C.A. Tucker. 2007. Fecal egg count reductions and performance as seen with feedlot steers treated with Dectomax, Cydectin and Cydectin plus Synanthic. Vet Therp. 8:311-7.

Lowrance T.C., G.H. Loneragan, D.J. Kunze, T.M. Platt, S.E. Ives, H.M. Morgan, B. Norby, A. Echeverry, M.M. Brashears. 2007. Changes in antimicrobial susceptibility in a population of E. coli isolated from feedlot cattle administered ceftiofur crystalline-free acid. Am J Vet Res. 68:501-7.

Edrington, T.S., T.R. Callaway, S.E. Ives, M.J. Engler, M.L. Looper, R.C. Anderson, and D.J. Nisbet. 2006. Seasonal shedding of E. coli O157:H7 in ruminants: a new hypothesis. Foodborne Pathog Dis. 3(4):413-21.

Edrington, T.S., T.R. Callaway, S.E. Ives, M.J. Engler, T.H. Welsch, D.M. Hallford, K.J. Genovese, R.C. Anderson, D.J. Nisbet. 2006. Effect of ractopamine HCl supplementation on fecal shedding of E. coli O157:H7 and Salmonella in feedlot cattle. Curr Microbiol. 53:340-5.

Loughin, T.M., D.E. Johnson, S.E. Ives, and T.G. Nagaraja. 2002. Methods for selecting crossover designs with applications to an experiment with two factors in a split plot. J. of Agric., Biol., and Environ. Statistics. 7:143-156.

Ives, S.E., E.C. Titgemeyer, T.G. Nagaraja, A. del Barrio, D.J. Bindel, and L.C. Hollis. 2002. Effects of virginiamycin and monensin plus tylosin on ruminal protein metabolism in steers fed corn-based finishing diets with or without wet corn gluten feed. J. Anim. Sci. 80:3005-3015.

Ives, S.E., E.C. Titgemeyer, T.G. Nagaraja, A. del Barrio, and D.J. Bindel. 1999. Effects of virginiamycin or monensin plus tylosin on ruminal fermentation characteristics in steers fed dry-rolled corn with or without wet corn gluten feed. 1999 Cattleman's Day Report. KSU Report of Progress 831. Pages 106-107.

Drouillard, J.S., S.E. Ives, D.W. Anderson, and R.H. Wessels. 1999. Comparative value of dry-rolled corn, distiller's dried grains, and wheat middlings for receiving diets. 1999 Cattleman's Day Report. KSU Report of Progress 831. Pages 81-83.

Ives, S, J. Drouillard, D. Anderson, G. Stokka, and G. Kuhl. 1999. Comparison of morbidity and performance among stressed feeder calves following vaccination with Pyramid 4+Presponse SQ. 1999. Cattleman's Day Report. KSU Report of Progress 831. Pages 126-129.

Corah, L.R. and S.E. Ives. 1991. The Effects of Essential Trace Minerals on Reproduction in Beef Cattle. Vet. Clin. N. Amer.:Food Anim. Prac. 7:1, 41.

ABSTRACTS/PRESENTATIONS

Renter, D.G., M.J. Alam, S.E. Ives, L.C. Hollis, D.U. Thomson, M.W. Sanderson, T.G. Nagaraja. 2006. Fecal shedding of Salmonella in feedlot calves that were treated for apparent respiratory disease. Conference of Research Workers in Animal Disease.

Ives, S.E. 2006. Practical application of the post treatment interval. Academy of Veterinary Consultants. Summer meeting.

Ives, S.E., T.G. Nagaraja, A.F. Park, and J.E. Shirley. 2001. Subacute ruminal acidosis in dairy cows, and experimental model. J. Dairy Sci. Vol 84 (Supp. 1). Pp 83.

Park, A.F., J.E. Shirley, J.M. DeFrain, E.C. Titgemeyer, E.E. Ferdinand, R.C. Cochran, D.G.Schmidt, S.E. Ives, and T.G. Nagaraja. 2001. Changes in rumen capacity during the peri-parturient period in dairy cows. J. Dairy Sci. Vol 84 (Supp. 1). Pp 82.

Ives, S.E. From acidosis to abscesses – Why are those cattle not performing? 1999. 61st Annual Conference for Veterinarians, Kansas State University College of Veterinary Medicine. June 6-9. Pages 77-88.

Loughin, T.M., D.E. Johnson, S.E. Ives, T.G. Nagaraja. 1999. Crossover designs for two factors in a split plot. Kansas State University Conference on Applied Statistics in Agriculture. April 25-27, 1999.

Bindel, D.J., J.S. Drouillard, E.C. Titgemeyer, S.E. Ives, and R.H. Wessels. 1998. Effects of ruminally protected choline and dietary fat on blood metabolites. J. Anim. Sci. Vol 77 (Supp. 1). Pp 76.

Ives, S.E., E.C. Titgemeyer, T.G. Nagaraja, A. del Barrio, and D.J. Bindel. 1998. Effects of virginiamycin or monensin and tylosin on ruminal fermentation characteristics in steers fed diets based on dry-rolled corn with or without wet corn gluten feed. J. Anim. Sci. Vol 77 (Supp. 1). Pp 77.

Ives, S.E., E.C. Titgemeyer, T.G. Nagaraja, A. del Barrio, and D.J. Bindel. 1998. Effects of virginiamycin or monensin plus tylosin on ruminal nitrogen metabolism in steers fed corn based finishing diets corn with or without wet corn gluten feed. J. Anim. Sci. Vol. 77 (Supp. 1). Pp. 247.

PROFESSIONAL AFFILIATIONS

American Veterinary Medical Association
Academy of Veterinary Consultants

Committee on Agriculture
U.S. House of Representatives
Required Witness Disclosure Form

House Rules* require nongovernmental witnesses to disclose the amount and source of Federal grants received since October 1, 2006.

Name: Samuel E. Ives

Address: P.O. Box 3050 Amarillo, TX 79116

Telephone: 806 373-2333

Organization you represent (if any): NCBA

---

1. **Please list any federal grants or contracts (including subgrants and subcontracts) you have received since October 1, 2006, as well as the source and the amount of each grant or contract. House Rules do NOT require disclosure of federal payments to individuals, such as Social Security or Medicare benefits, farm program payments, or assistance to agricultural producers:**

Source: _____ **Amount:** _____

Source: _____ **Amount:** _____

2. **If you are appearing on behalf of an organization, please list any federal grants or contracts (including subgrants and subcontracts) the organization has received since October 1, 2006, as well as the source and the amount of each grant or contract:**

Source: _____ **Amount:** _____

Source: _____ **Amount:** _____

Please check here if this form is NOT applicable to you: ✓

Signature: Samuel E Ives

* Rule XI, clause 2(g)(4) of the U.S. House of Representatives provides: *Each committee shall, to the greatest extent practicable, require witnesses who appear before it to submit in advance written statements of proposed testimony and to limit their initial presentations to the committee to brief summaries thereof. In the case of a witness appearing in a nongovernmental capacity, a written statement of proposed testimony shall include a curriculum vitae and a disclosure of the amount and source (by agency and program) of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) received during the current fiscal year or either of the two previous fiscal years by the witness or by any entity represented by the witness.*

PLEASE ATTACH DISCLOSURE FORM TO EACH COPY OF TESTIMONY.