

Seed Cotton Program Frequently Asked Questions (FAQ)

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Responses are based on NCC's interpretation of the legislative language. Final answers are subject to change based on USDA's implementation of the provisions.

Please review the Seed Cotton Summary document located on the NCC website for specific program details.

Generic Base Conversion

- **Why was it necessary to establish a Seed Cotton program in advance of the 2018 Farm Bill and convert generic base acres in 2018 instead of 2019?**

Cotton producers needed an improved safety net as soon as possible. The Supplemental Disaster Bill was the latest legislative vehicle to accomplish that outcome. The bill provided an opportunity to add additional baseline funding for dairy and cotton prior to the 2018 Farm Bill. Adding new money in the 2018 Farm Bill process would not have been possible. Addressing the cotton and dairy programs now should allow the upcoming farm bill debate to be less difficult.

Generic base acres are cotton base acres from the previous farm bill and were intended as a temporary measure to keep some support on those acres until a new cotton policy was implemented in Title I. The conversion of generic base in the 2018 crop year, one year ahead of the new farm bill, helped ensure that the budget resources currently associated with generic base acres would remain within the new cotton program and with other crops that establish base acres by converting generic base to crop specific bases.

- **What is the default option for assigning base acres?**
The default is Option 1. Seed cotton base equals the higher of 2009-2012 average cotton plantings or 80% of generic base. If average 2009-2012 plantings exceed generic base, there are no unassigned acres, but a producer is also not allowed to establish seed cotton base in excess of generic base.
- **If a farm has generic base acres but did not plant a covered commodity from 2009-2016, what happens to the generic base acres?**
The generic base acres become unassigned base and will not be eligible for PLC/ARC payments for the 2018 crop year.
- **What happens to unassigned base acres? Is there risk of losing cotton base acreage if shifted to unassigned base in future farm bills?**
Unassigned base is not eligible for PLC/ARC payments. The legislation directs FSA to maintain records for unassigned base acres. The treatment of unassigned base in future farm bills will likely be based on budget availability.

- **Can the generic base be reallocated to other crop bases if cotton had not been produced on those acres from 2009-12?**
 Yes. The generic base acreage could also be converted to seed cotton base. Under Option 1, seed cotton base equals the higher of 2009-2012 average cotton plantings and 80% of generic base. Under Option 2, generic base is allocated based on the proportion of covered commodities, including cotton, planted from 2009-2012.
- **If there was no covered commodity planted on a farm in 2009-2016, will the generic base acres be lost?**
 If at least 1 acre of 1 covered commodity was not planted in any single year from 2009-2016, generic base would be converted to unassigned base.
- **If you have generic base but no cotton planting history in 2009-2012, is generic base eligible to be converted to seed cotton base?**
 Under Option 1, 80% of generic base would be converted to seed cotton base. Under Option 2, the farm could allocate generic base acres to covered commodities planted from 2009-2012.
- **If your average planted acres of cotton from 2009-2012 is less than 80% of generic base, will you lose cotton base acres?**
 Under Option 1, 80% of generic base would be converted to seed cotton base. The remaining 20% would be unassigned base. Under Option 2, the farm could allocate all generic base acres to covered commodities, including cotton, in proportion to acres planted from 2009-2012.
- **If a farm has 60 acres of generic base and planted an average of 60 acres of cotton in 2009-2012, is the seed cotton base now 60 acres?**
 Under option 1, 60 acres of generic base would be converted to seed cotton base. Under option 2, generic base would be allocated to cotton and any other covered commodities planted from 2009-2012. If cotton was the only covered commodity planted in 2009-2012, 60 acres of generic base would be converted to seed cotton base under option 2.
- **What happens to generic base if a loan commodity, but not a covered farm commodity, was planted between 2009-2016?**
 The generic base will become unassigned base.
- **If a producer with generic base has not planted any covered commodities on the farm since 2009, will they still be eligible to convert 80% of generic base to seed cotton?**
 No, the farm must plant a least 1 acre of 1 covered commodity in any single year from 2009 to 2016 to be eligible for seed cotton base. Generic base would become unassigned base.
- **If a farmer planted sugarcane on generic acres between 2009-2016, would all generic acres become unassigned?**
 Yes. Sugarcane is not a covered commodity.

- **On 500 acres of generic base, a farmer has planted an average of 250 acres of corn and 250 acres of soybeans during 2009-2012, would the grower still be able to convert 80% to seed cotton?**
 Yes. The grower could choose Option 1 and convert 80% of generic base (400 acres) to seed cotton base. The grower could also choose Option 2 and allocate generic base to 250 acres of corn and 250 acres of soybeans.
- **Will peanut base acreage remain on the farm if you haven't planted peanuts in recent years?**
 Yes. Existing peanut base acreage or any other covered commodity base acreage will remain unchanged. If the farm planted peanuts during 2009-2012, the farm could also gain additional peanut and other covered commodity base acreage by allocating generic base under Option 2.
- **Can a farmer with multiple FSA farm numbers choose option 1 for one farm and option 2 for another farm?**
 Yes, the generic base conversion is on a farm-by-farm basis.
- **Since these choices only apply to the 2018/19 crop year, is there a choice that could lock the farm out of one covered crop or another down the road?**
 Once the farm chooses the generic base conversion option, it is not likely that producers will have any base update options in the 2018 farm bill.
- **Will there be any updates for farms without generic base?**
 No, not under this program. The update only applies to farms with generic base acres and converting the generic base to seed cotton base and other covered commodity bases.

 A broader base update would have to be covered in the next farm bill, but budget constraints make that very unlikely in the 2018 farm bill.
- **How will skip-row planted acres on generic base be treated under the '09-12 option to convert only to seed cotton base or '09-12 cotton and other crop generic base conversion? Can you convert up to generic base total the land area planted or only the crop area planted, accounting for the skip-row pattern?**
 Generic bases did not exist in 2009-12. FSA will use the net upland cotton acreage that was recorded on acreage reports. Skip-row cotton should have been reported by producers as actual cotton acreage planted. As an example, 2x1 skip-row pattern results in 2/3 of the field being planted to cotton assuming the row widths are the same. In this example for a 100-acre field, 66.67 acres of cotton would be planted.
- **How will the combining of farms under the same FSA number affect generic bases?**
 A combination of land on tracts into a farm has no effect on generic base acres. The resulting farm (or child farm) will have to perform all the actions that the parent farm had to perform in the same time period. Only farms that made similar crop election decisions can be combined.

- **Can total annual planted acres exceed total generic base acres for purposes of calculating the 2009-2012 average as long as the average cannot/does not exceed the total generic base? Similarly, to determine the average plantings for '09-12, can the farm use a year when cotton planting acres were higher than generic base acres for that one year, with the understanding that the average plantings cannot exceed generic base acres for the purpose of determining seed cotton base?**

Yes, if acres in a given year exceeds generic base, the full planted area will be used in the average. However, the allocation will be based on the 4-year average planted and considered planted acres of each covered commodity for the 2009 through 2012 crop years.

- **Is there any flexibility on crops that are considered covered commodities for purposes of the 2009-2016 unplanted generic acres, i.e. ELS cotton, sugarcane, other loan commodities?**

Covered commodities are defined in the farm bill and only include barley, canola, large and small chickpeas, corn, crambe, flaxseed, grain sorghum, lentils, mustard, oats, peanuts, dry peas, rape seed, long and medium grain rice, safflower, sesame, soybeans, sunflower seed, wheat, and seed cotton.

- **If a farm chooses to reallocate all generic base acres according to the 2009-2012 planting ratios, (i.e. Option 2) and only planted cotton on that farm in 2009-2012, will all generic base acres be converted to seed cotton base since cotton was 100% of covered commodity acreage?**

Yes, if the cotton that was planted was upland cotton.

- **What if cotton was NOT planted on a farm from 2009-2016 but wheat was planted on the farm for harvest during the same year?**

The farm could choose Option 1 or 2. Under Option 2, 80% of generic base would be converted to seed cotton base. Under Option 2, generic base would be allocated to covered commodities planted during 2009-2012. Generic acres would be allocated to wheat if wheat was the only covered commodity planted during 2009-2012.

Yield Update

- **How will the yield update work?**

Land owners will have a one-time opportunity to update the upland cotton payment yield using 90% of the farm's 2008-2012 simple average yield per planted acre, excluding any year when cotton was not planted. If any individual yield for any of the 2008-2012 years is less than 75% of the average county yield over the years 2008-2012, 75% of the average county yield will be substituted. If the updated yield is lower than the CCP yield, the CCP yield will be used. Program payment yields are used to determine payment amounts for the PLC program and are not used for the ARC program. However, all farm owners have the option of updating yields regardless of the PLC/ARC election.

- **Why are we using data from 2008-2012?**

This is consistent with the yield update for other covered commodities in the 2014 farm bill.

- **Will payment yields be updated even if selecting ARC?**

All owners will be allowed to update the PLC yield, regardless of program elected.

- **Are the yield updates dependent on 2008-2012 production or current years' APH?**
For the yield update, actual yields per planted acre from 2008-2012 will be used.
- **If I update my yields using irrigated and non-irrigated yields on the same FSA farm number, will the average be a simple average or a weighted average?**
A weighted average will be used to determine the farm payment yield for an individual year using irrigated and dryland production. A simple average of the combined irrigated/non-irrigated payment yields for 2008-2012 will be used to determine the farm payment yield for the yield update.
- **If generic base is allocated to other covered commodities, such as rice or soybeans, what payment yield would apply to the new rice or soybean base acres?**
If a farm already has rice or soybean base acres on a farm, the farm will use the existing payment yield for new rice and soybean base acres. During the 2014 Farm Bill implementation, farm owners had the option to update yields for rice, soybeans, and other covered commodities.

Yield and Planting History

- **What yield data are acceptable for updating lint payment yields?**
Owners of farms will certify to pounds of cotton. If required for spot-checking purposes, RMA data including appraisal records, gin bale listing, warehouse ledger sheets, CMA ledger sheets, etc. will be acceptable documentation.
- **Does FSA have the historical yield data and planted area data for farms if ownership/control has changed in recent years relative to the years used for yield update?**
FSA maintains historical acreage data. FSA does not typically have yield records.
- **How will yield updates on farms with both irrigated and non-irrigated production be calculated?**
The PLC yield will be a yield per planted acre without regard to irrigation practice.
- **Can county yield data or yields from similarly situated farms be used for updating payment yields on farms with no cotton planting history between 2008-2012 that choose the 80% conversion option?**
The PLC yield will be the CCP yield times 2.4 or the updated yield based on the yield per planted acre from 2008-2012 (not counting zero planted years) times 2.4. In this example, since cotton was not planted between 2008-12, the farm would receive the CCP yield times 2.4.
- **What information and production records may be used to prove 2008-2012 yields?**
The same information used in the 2014 Farm Bill implementation can be used. FSA records, crop insurance records, and producer-provided records (as long as they can be verified) may be used.

- **When the 2014 Farm Bill was implemented, were payment yields established for all crops on farms with generic base or only those crops where PLC option was elected?**
 Yields were established on farms with covered commodities. Also yields were established for covered commodities on farms with generic base acres when that covered commodity was attributed base acres.
- **What decisions were made following the 2014 farm bill on crops other than cotton on farms with only generic base acres? Was cotton data already provided in this process but not utilized, or is this process starting from the beginning on obtaining cotton yield data?**
 Cotton acreage was not provided to producers in 2014. If a farm had generic bases acres the owners on the farm made an ARC and/or PLC election for 21 covered commodities. No yields were established unless that covered commodity was attributed base acres.
- **Will FSA be providing yield and planting history information to producers?**
 It is our understanding that FSA will provide planting history data to producers, but not yield data.
- **Will they take crop insurance records for the yield update?**
 Yes.
- **For tenants adding farms after 2012, will they be allowed to use the previous tenants yield records?**
 Previous yield history can be used but it will be the responsibility of the current tenant to get the data from the previous tenant or landowner.
- **How do young/beginning farmers or other producers who weren't farming a particular farm number in 2009-2012 obtain production history?**
 The current tenant will need to obtain the production/yield history from either the previous tenant or the landowner. FSA cannot provide this data, if it has the data, unless the landowner or previous tenant gives permission.
- **If generic base is converted into other base acres, i.e rice and beans, will the current yield that is already associated with those commodities be used?**
 Yes. The payment yield for other covered commodities will not be updated under this program.
- **What about new producers with no cotton history renting farm land that had no cotton on it since 2000?**
 In this case, if the farm has generic base acres and at least 1 acre of 1 covered commodity was planted from 2009-2016, the farm could be updated with Option 1 or 2. Under Option 2, 80% of generic base would be converted to seed cotton base. Under Option 2, generic base would be allocated to covered commodities planted during 2009-2012.
- **Are the yield updates based on data provided by the producer or RMA data?**
 For the yield update in the 2014 Farm Bill, FSA accepted producer data and RMA data.

- **Is the CTAP Yield on FSA form 156EZ a seed cotton or lint yield?**

The CTAP yield is the upland cotton lint DP yield. Farms did not have a seed cotton payment yield prior to this legislation. The yield used for the PLC program is the CCP yield.

ELS Cotton

- **Is ELS cotton eligible for the Seed Cotton program?**

No. ELS cotton is not eligible for the Seed Cotton program. ELS cotton is not considered a covered commodity.

CRP Land

- **How will farms enrolled in CRP during 2009-2012 crop years, but with generic base acres on the farm, be allowed to convert generic base to seed cotton and other crop bases? If the farm was in CRP for the entire period of 2009-2016, will generic acres on that farm become unassigned base?**
To be determined.

PLC/ARC Election

- **Will this be a one-time sign up decision or will this be on a year to year basis?**

The current program only applies to the 2018 crop year. While we do anticipate that the PLC/ARC enrollment will be made each year, details will be included in the 2018 Farm Bill.

- **What if a farm sells after the PLC/ARC election is made?**

Once the decision is made, it is final and remains with the farm number.

- **If farm has a new renter is that renter bound by the decisions of the previous renter?**

Yes.

- **Can a producer choose between PLC or ARC for seed cotton?**

Yes, producers will have the choice between PLC or ARC for seed cotton. For the 5-year Olympic average price, the seed cotton reference price is substituted for any year if the seed cotton MYA price is below the reference price. This could make the price guarantee attractive. However, the ARC program only provides a payment if the actual county revenue is below 86% of the benchmark county revenue. In addition, the payment band is from 76% - 86% of benchmark revenue. The ARC guarantee cannot increase or decrease by more than 10% from year-to-year. The maximum ARC payment will likely be lower than the maximum PLC payment.

- **After 2018, can a producer grow cotton and not participate in PLC if PLC was elected in 2018?**

We assume that the same procedures used during the 2014 Farm Bill implementation will be used for the Seed Cotton Program. Under the 2014 Farm Bill, the PLC/ARC election was a one-time decision for each crop on each farm. However, the producer must enroll each farm in PLC/ARC each year to be eligible for PLC/ARC payments. Since 2018 is the last year of coverage under the 2014 Farm Bill (unless an extension occurs), the 2018 Farm Bill provisions will apply to the 2019 crop year.

- **If a farm elected in ARC or PLC for grain in 2014, can the election for other covered commodities be changed when a farm elects ARC or PLC for seed cotton?**
It is our understanding that the ARC/PLC election for other covered commodities cannot be changed under this program.
- **If a farm is currently in ARC-IC, and now will have seed cotton base acres on the farm, can the producers make a new election by crop between ARC-CO and PLC?**
No. The farm made a one-time decision to elect ARC-IC for all base acres on the farm.

Lint Marketing Year Average (MYA) Price

- **What price is used for the Lint price?**
The lint price is the NASS MYA price which is a national farmgate price. The NASS price is not the world price or the futures price. The 2018 marketing year for cotton is from August 1, 2018 – July 31, 2019. NASS does publish monthly estimates. The monthly MYA price is weighted by the average number of bales marketed. The basis between the NY futures and the NASS MYA price changes but an average range is typically between 6 to 8 cents per lb. If the NY futures price is trading at 75 cents per lb, the NASS MYA price would generally be around 67-69 cents per lb.
- **Are prices quoted rule 5, base grade, 41-4-34 with premium mic?**
No. This price does not reflect a specific quality. The NASS MYA price is the average price received by farmers across all qualities of cotton.

Cottonseed MYA Price

- **Can you please give a breakdown of how the cottonseed price is calculated?**
The Cotton Ginnings survey program collects data used to measure monthly cottonseed prices. All active gins for a given crop season are included in the survey. This includes gins in all 17 cotton producing states. The 17 states do not include Kentucky or Maryland, who produce a very minimal amount of cotton and are not generally considered as cotton producing states.

The cotton ginning survey is conducted 13 times throughout each season. This includes August 1 (TX only) and September 1 (TX only), semi-monthly from September 15 through February 1, and an end-of-season questionnaire administered as each firm finishes ginning for the season.

Monthly prices received for cottonseed are collected on the first of the month ginning surveys, October through March. Texas collects these data beginning with the August 1 survey (cottonseed prices collected 8 times throughout the season).

The cotton ginnings program is a census of about 900 active gins. Prior to the beginning of each ginning season, NASS supplements its list of gins from the previous season with a list supplied from each of the USDA's Agricultural Marketing Service (AMS) classing offices.

The survey reference dates for the 13 ginning surveys are August 1 (TX only), September 1 (TX only), September 15, October 1, October 15, November 1, November 15, December 1, December 15, January 1, January 15, February 1, and the end-of-season (March 1).

The cottonseed price is the average price the gin paid for all cotton seed that may be used for seed, feed, export, etc. Usually, a gin will give credit to the producer at an agreed upon price, and at a later date, the gin will settle with the producer. The price that is credited is an acceptable price but does not include prices that were credited in earlier months with the current month's average price. The price refers to an all cottonseed price and is collected separately for price paid to producers for Upland and American-Pima cottonseed. Below are examples of the questions asked on the NASS cotton ginnings questionnaire.

- **Is the cottonseed price a weighted average based on production nationwide?**
Prices are weighted by monthly production and pounds marketed. The NASS MYA cottonseed price used for the seed cotton PLC/ARC program is a national price.
- **What if cotton seed prices are equal to this year... at \$115 per ton?**
The matrix on the NCC website starts at \$140/ton, but cottonseed prices below \$140/ton would be used in the seed cotton price calculation. The seed cotton MYA price floor is \$0.25. The PLC payment would max out with a seed cotton MYA price of \$0.25. Price floor at \$.0.50 and \$125/ton.
- **Why did you use a 2017/18 MYA cottonseed price of \$150/ton in the examples?**
The current range for the 2017/18 MYA cottonseed price in the USDA ERS Oilseeds Monthly Outlook is \$130 - \$180/ton, so the average of \$150/ton was used. The NASS monthly prices for 2017/18 have ranged from \$130 - \$150/ton.

Seed Cotton MYA Price

- **What is the NASS MYA price for lint, cottonseed, and seed cotton from 2012 to 2017?**
NASS publishes lint and cottonseed prices, but not seed cotton prices. The following table presents the NASS estimates for lint and cottonseed, but the seed cotton prices are NCC estimates based on actual NASS lint and cottonseed production and prices.

Marketing Year	Lint MYA Price (\$/lb)	Cottonseed MYA Price (\$/ton)	Seed Cotton MYA Price (\$/lb)
2012/13	\$0.725	\$252	\$0.373
2013/14	\$0.779	\$246	\$0.393
2014/15	\$0.613	\$194	\$0.316
2015/16	\$0.612	\$227	\$0.325
2016/17	\$0.680	\$195	\$0.346
2017/18 estimate	\$0.680	\$140	\$0.328

ARC Prices and Yields

- **Will there be irrigated and non-irrigated ARC county yields?**
This will depend on data availability for each county.

- **For ARC, if the MYA price for a year is less than the Reference Price do you substitute the reference price when calculating the 5-year Olympic average price?**

Yes. If the seed cotton MYA price in any of the 5 years is below the reference price of \$0.367, \$0.367 is substituted. The reference price would be substituted for the seed cotton MYA price in 2014/15, 2015/16, and 2016/17.

PLC/ARC Payments

- **Will the PLC program provide coverage up to the 2018 cotton loan rate or will there be a gap between loan and the maximum payment?**

It is hard to provide a definitive answer. The price matrix on the NCC website provides estimated seed cotton prices for combinations of cotton lint and cottonseed. When the lint price was \$0.51 and the cottonseed price was \$140, the price for seed cotton was \$0.26 per lb. The price floor of \$0.25 per lb implies a maximum payment rate of \$0.11 per lb. By the time you max out the PLC payment, the lint price may be a cent or two below the loan rate for \$0.52.

- **Is the 85% factor applied to both payment base acres and the per acre payment?**

No. It is only applied once to the payment base acres. In the payment matrix on the NCC website, the 85% factor has already been applied to get the per acre payment across all base acres.

- **What would have been the PLC payment per acre in 2016/17?**

We have provided some historical calculations for PLC and ARC on the NCC website. For 2016/17, the lint MYA price was \$0.68, the cottonseed MYA price was \$195/ton, resulting in a seed cotton MYA price of \$0.346. For the 2017/18 example in the NCC summary document and webinar, we used a lint MYA price of \$0.69 and a cottonseed MYA price of \$150/ton, resulting in a seed cotton MYA price of \$0.335. Using a seed cotton payment yield of 1,920 lbs/acre, the seed cotton PLC payment be \$35/acre for 2016/17 and \$52/acre for 2017/18.

- **Are these payments decoupled from production, so payments will be issued irrelevant of planted acres?**

Yes. The seed cotton payments will be paid on decoupled seed cotton base, which is consistent with the 2014 Farm Bill PLC and ARC County programs for other covered commodities.

Payment Date

- **When will payments be made for the 2018/19 crop?**

The timing of seed cotton payments will be the same as the ARC/PLC payments for other covered commodities. Payments will be made in October 2019.

STAX

- **Will PLC/ARC replace STAX or will it still be available after 2018?**

STAX will continue to be available. After the 2018/19 crop year, the intent of the legislation is that producers can choose between PLC/ARC and STAX on a farm.

- **Going forward after 2018, will growers have the choice between STAX and seed cotton PLC/ARC on a yearly basis or do you choose for the life of the Farm Bill?**

The intent of the legislation is for the decision to be made on an annual basis. There is a one-time election between PLC and ARC. Enrollment in PLC/ARC is an annual decision and producers could choose between PLC/ARC and STAX for each crop year.

- **Since the 2018 insurance enrollment period has already passed, will there be an extension or grace period given to make adjustments?**

No. For the 2018/19 crop year, producers can purchase STAX and be enrolled in PLC or ARC.

- **In the 2019/20 crop year, can a producer purchase STAX on one farm number and enroll another farm number in the seed cotton PLC or ARC program?**

Yes. The STAX policy would be purchased for all cotton acres not enrolled in the seed cotton PLC or ARC program.

- **If cotton is planted on unassigned base acres in the 2019/20 crop year, can the producer purchase STAX on those acres?**

It is a farm number by farm number decision. If an FSA farm number is enrolled in the seed cotton PLC/ARC program, any acreage on that farm number would be ineligible for STAX. The STAX requirement is that all farm numbers in the county not enrolled in the seed cotton PLC/ARC program would be enrolled in STAX.

SCO

- **If a farm is enrolled in the seed cotton PLC or ARC program, can SCO be purchased for cotton?**

Yes.

Landowner Signatures/Power of Attorney

- **Does the producer or landowner select the base update option, decide on the yield update, and make the PLC/ARC election?**

For the yield update and base update, the landowner makes the decision. For the PLC/ARC election, all producers on a farm make the election.

- **Which power of attorney (POA) forms at FSA are applicable for making these decisions on behalf of landowners?**

An FSA-211 that has selected “All Current Programs” and “All Actions” may be used during the yield update, base acre allocation, and election of program on seed cotton acres. Producers may also complete an FSA-211 and limit the POA to seed cotton decisions.

- **What happens to the generic base if you fail to get all landowner signatures?**

The default is Option 1. Seed cotton base would be the higher of the 2009-2012 average cotton plantings and 80% of generic base.

Payment Limits

- **How will payment limits work during times of low prices where growers would likely receive a PLC payment as well as a potential POP or LDP payment?**
Seed cotton ARC/PLC payments will be applied to the \$125,000 payment limit. Seed cotton payments and LDP or POP payments would both be applied to the same \$125,000 payment limit. If cotton is put into the loan and redeemed with commodity certificates, any marketing loan gains through the use of certificates would not be applied to the \$125,000 limit.
- **What is the payment limit per person?**
\$125,000 per person or legal entity. Additional information can be found on the USDA website: <https://www.fsa.usda.gov/programs-and-services/payment-eligibility/index>.
- **Does this legislation include changes to the rules for entities?**
No.
- **Does any part of this go against your direct payment limitation?**
Yes. Seed cotton PLC or ARC payments will be applied to the \$125,000 payment limitation.

Sequestration

- **Will the 2018/19 Seed cotton PLC Payment be subject to sequestration?**
Yes.

Marketing Loan Program

- **Does LDP program end with this program?**
No. The non-recourse marketing assistance loan for upland cotton lint remains unchanged in the 2014 Farm Bill with an upland cotton loan rate of \$0.52/lb for the 2018 crop.
- **Are commodity certificates still in effect for the 2018/19 crop year?**
Yes. This program does not affect the availability of commodity certificates.

USDA Farm Service Agency (FSA) Implementation

- **What is the expected implementation timeline and how soon will FSA provide information to landowners and producers? When will program decisions and sign-up begin?**
To be determined.
- **Will FSA offer any similar decision tools on base reallocation and yield update options?**
FSA will provide a tool to calculate a PLC yield and a tool to calculate the base acre allocation based on option selected.