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Vincent P. Reusing
Senior Vice-President

January 8, 2001

Docket No. 00-037-2
Regulatory Analysis and Development, PPD, APHIS
Suite 3C03
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Comment regarding Docket No. 00-037-2 - Secured Lender Concerns

To Whom It May Concern:

Metropolitan Life Insurance Company (MetLife) appreciates the opportunity to comment on your proposed amendment to citrus canker regulations. Metropolitan Life Insurance Company, a subsidiary of MetLife, Inc. (NYSE: MET), is a leading provider of insurance and other financial services to individual and group customers. MetLife is the largest insurance company lender to American agriculture and has approximately five billion dollars invested in farm, ranch and agribusiness loans.

We understand that the amendment would establish provisions under which eligible owners of commercial citrus groves could, subject to the availability of appropriated funds, receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker. These regulations and related payments would complement your October 16, 2000, interim rule (Docket No. 00-037-1) that provides for the payment of tree replacement funds to eligible owners of commercial citrus groves and help to reduce the economic effects of the citrus canker quarantine on affected commercial citrus growers.

Agriculture lenders to these commercial citrus growers (MetLife among them) have loaned funds to these growers secured by mortgages on the citrus groves. Condemnation and insurance payments related to government takings or damage to improvements are routinely made payable jointly to the parties in interest to ensure that the loan is paid down appropriately or satisfactory repairs made. Lenders to the agricultural industry should be entitled to the same protection on payments related to the severe diminution of the value of its security by the forced removal of infected trees.

We strongly support the amendment to the citrus canker regulations to establish provisions under which eligible owners of commercial citrus groves could receive payments to recover production income lost as a result of the removal of commercial citrus trees to control citrus canker. We further strongly recommend inclusion of

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