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ANALYSIS OF THE ORGANIC FOOD
INDUSTRY, 1990-2011

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SHIFTING LEGITIMATING ACCOUNTS IN A CHANGING INSTITUTIONAL FIELD: AN
ANALYSIS OF THE ORGANIC FOOD INDUSTRY, 1990-2011

by

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A Dissertation
Submitted in Partial Fulfillment of the Requirements for the
Doctor of Philosophy in Business Administration

Department of Business Administration
in the College of Business
Southern Illinois University Carbondale
May 2013

DISSERTATION APPROVAL

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Michael Joseph Sheridan

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Fulfillment of the Requirements

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in the field of Business Administration

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AN ABSTRACT OF THE DISSERTATION OF

Michael Joseph Sheridan, for the Doctor of Philosophy degree in Business Administration, presented on March 29, 2013, at Southern Illinois University Carbondale.

TITLE: SHIFTING LEGITIMATING ACCOUNTS IN A CHANGING INSTITUTIONAL FIELD: AN ANALYSIS OF THE ORGANIC FOOD INDUSTRY, 1990-2011

MAJOR PROFESSORS: Dr. John M. Pearson, Dr. Jonathon Mote

In this study, we argue the organic industry's move towards a more legal definition of organic production indicated a shift in the legitimating criteria in the organic agriculture institutional field, which can be observed through the analysis of the legitimating accounts of various actors. Prior to USDA certification, institutional actors in the organic food field largely relied upon the norms and values of its participants to maintain order. Legitimacy was based on the perception that a firm embodied a certain value set, which typically included opposition to large-scale commercial operations (DeLind, 2000; Drinkwater, 2009). To some, the introduction of federal standards signaled a replacement of the personal trust between consumer and producer, and an increased reliance on external policies mandated by federal certification (Guthman, 2000; 2004a; 2004b).

This study explores the intricacies of the various actors' legitimating accounts during this time of a shifting institutional field. Central questions include: how do these actors adapt their legitimating accounts to the changing context? Is there a discernible pattern to their rhetoric, not only over time, but also in relation to the other contemporary legitimating accounts? And finally, if patterns are evident, can they provide insight into the dynamics of legitimating sources in this institutional field?

ACKNOWLEDGEMENTS

I would like to thank my co-chairs, John Pearson and Jon Mote for their support, wisdom, guidance, and (most importantly) trust that I would finish this project in a timely manner.

I am eternally indebted to my wife, Robyn. Without her resolve and sacrifice, I would still be working to finish my degree.

Last, but not least, I would like to thank my mother, father, and sister. Their patient support provided me with the confidence and strength to endure twenty-something years of school.

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CHAPTER 1

INTRODUCTION

Legitimacy is not a commodity to be possessed or exchanged, but rather a condition reflecting perceived consonance with relevant rules and laws, normative support, or alignment with cultural-cognitive frameworks – Richard Scott, Institutions and Organizations: Ideas and Interests, 3rd ed., p. 59-60.

In 2000, under the direction of the United States Department of Agriculture (USDA), the National Organic Program (NOP) released the National List; a document which specified the production and handling procedures required for organic products. Prior to the passage of these regulations, numerous states had established their own standards, which resulted in a wide spectrum of rules for organic food products. The various criteria allowed for a diverse set of practices, with instances of multiple, and potentially conflicting, interpretations of organic production existing in the same market (Constance, 2010; DeLind, 2000). Thus, the USDA devised standards with the intent to reduce consumer fraud and provide a coherent set of standards to facilitate interstate commerce (Ingram & Ingram, 2005). After a five year process, in 2002, the Federal Register (62 FR 65850) activated the technical specifications required for a food product in the United States to legally display the USDA organic label. Many agree that the federal organic standards facilitated interstate trade and reduced instances of fraud (c.f. Greene, et al., 2009). However, it has been argued the federal mandates stripped the organic label of its philosophical foundation, and created industry conditions that attracted the entrance of large conventional food companies (Constance, 2010; Ingram & Ingram, 2005).

Researchers have yet to reach consensus regarding the full economic impacts of the legal definition of organic food, but most agree the USDA standards dramatically altered the institutional field of organic agriculture, particularly in the ownership patterns of the processors, which increased consolidation and corporate ownership (Howard, 2009). Specifically, the federal regulations lowered entry barriers for many larger firms, allowed them to capture greater economies of scale, and to expand their operations to a national level (Guthman, 2004a; 2004b; Howard, 2009).

In this study, we argue the organic industry's move towards a more legal definition of organic production indicated a shift in the legitimating criteria in the organic agriculture institutional field, observable through the analysis of the legitimating accounts of various actors. Prior to USDA certification, institutional actors in the organic food industry largely relied upon the norms and values of its participants to maintain order. Legitimacy was based on the perception that a firm embodied a certain value set, which typically included opposition to large-scale commercial operations (DeLind, 2000; Drinkwater, 2009). To some, the introduction of federal standards signaled a replacement of the personal trust between consumer and producer, and an increased reliance on external policies mandated by federal certification (Guthman, 2002; 2004a; 2004b). Thus, regulations became a surrogate for trust, a mediator between the consumer and producer, and increased the potential for opportunistic behavior and fraud. Furthermore, by explicitly defining allowable inputs into organic production, the new organic standards reduced organic agriculture to a technical measure; an approach that long-time organic advocates contend was incommensurable with the industry's original focus (DeLind, 2000).

Regulations also intensified a developing tension in organic agriculture between lifestyle and commercial growers.¹ Some authors have portrayed the tension as a rift between these two interests. On one side of the debate are the vestiges of the organic pioneers, those producers and consumers dedicated to the philosophical foundations upon which organic agriculture was founded. On the other side, are growers who were initially drawn to the growth opportunities in organic food and who meet the minimum requirements of certification (Allen & Kovach, 2000; Buck, Getz, & Guthman, 1997; DeLind, 2000; Friedmann, 1993; 2005; Hess, 2004; Lockie & Halpin, 2005; MacRae, Henning, & Hill, 1993; Michelsen, 2001). The new federal regulations not only blurred the distinctions between the types of growers, it also represented a foundational shift in the institutional field; transforming its competitive dynamics and potentially recasting the conception of legitimacy (Fligstein 1991; Hoffman, 1991; Meyer, 1982; Lorange, Scott, Morton, & Ghoshal, 1986; Scott, 2001).

To inform our analysis of legitimacy in the organic food industry, we draw upon institutional theory (DiMaggio & Powell, 1983; Meyer & Rowan, 1977; Scott 2001; Sillince & Suddaby, 2008; Suddaby & Greenwood, 2005). One aspect of institutional theory that is of interest to our study is Suchman's (1995) conception of the various types of legitimacy potentially present in an institutional field. Suchman (1995) identified three types; pragmatic, moral, and cognitive; each of which corresponded with Scott's (2001) institutional pillars; regulative, moral, and cultural-cognitive. While each type of legitimacy shares the requirement that the audience's perception of the organization's actions is deemed appropriate within a socially-constructed framework, each has a different behavioral dynamic. Pragmatic legitimacy,

¹ Although the terms are not always distinct, we consider the term "lifestyle growers" to consist of smaller producers who are primarily drawn to the moral and ethics elements of organic agriculture. We consider commercial growers to be larger producers geared towards a greater market orientation.

which occurs under Scott's regulatory pillar, is granted by the audience through an exchange transaction in which the audience bestows legitimacy only when they determine it is in their best interests to do so. Moral legitimacy, in contrast, is associated with the normative pillar. Here, the audience does not derive legitimacy judgments from self-interest; rather moral legitimacy results when the actions of the organization are congruent with the established normative order. Finally, cognitive legitimacy is evident when there is an absence of alternatives; the actor/action achieves a taken-for-granted status.²

When institutional fields are stable or have distinct boundaries, the sources of legitimacy - those entities that deem certain actions appropriate (Reuf & Scott, 1998) - can be categorized into at least two groups; those with sovereignty over the firm, such as government regulatory agencies, and those that have "collective authority over what is acceptable theory" (Deephouse & Suchman, 2008; p. 55). Each group corresponds with Suchman's (1998) first two types of legitimacy. When an institutional field values pragmatic legitimacy, the source of legitimacy is easily identifiable as the regulatory body. However, the problem arises when one seeks to identify the source of legitimacy in an institutional field characterized by collective authority, as no group has an inherent claim over determining what is legitimate. Therefore, a central issue in the research of legitimacy has become the identification of those sources of legitimacy that exist when collective authority or ambiguity is present (Deephouse & Suchman, 2008). We suspect that a close analysis of the rhetoric employed by organizational actors to establish credibility can potentially identify the sources of legitimacy in an institutional field characterized by collective authority, such as the organic food industry.

² We argue in Chapter 2 that the institutional field in organic food has not yet developed a cognitive element of legitimacy, thus we currently omit it from our analysis.

We use the term rhetoric to denote the use of persuasive language that is crafted for a specific audience and is used by an actor to establish an identity (Hartelius & Browning, 2008; Sillince, 2005). The systematic analysis of rhetoric considers the context in which the text occurs and assumes a link between language and action / cognition. Our study follows the “new rhetoric” tradition which seeks to understand the manner in which meanings shift during times of social change (Suddaby & Greenwood, 2005).

While some scholars consider rhetoric to be non-essential to human interaction and disconnected from action or intent (Golberg & Markóczy, 2000; Hunt, 1994), there has been a recent trend in the literature to approach rhetoric as a “symbolic inducement” (Hartelius & Browning, 2008, p. 19) performed by all actors. This view considers rhetoric to be a “core form of communication that coordinates social action” (Silince & Suddaby, 2008; p. 6). Taking this perspective, when actors employ rhetoric, they draw from available tropes, argument, and imagery in order to meet the organization’s needs or goals (Emrich, 2001; Gardner & Arolio, 1998; Hartelius & Browning, 2008; Pinder & Bourgeois, 1982). Further, it has been shown that rhetorical analyses can provide insight into both the actor’s interpretations of events and their attempts to influence those events (Hartelius & Browning, 2008).

Rhetorical analyses have been applied to a wide range of organization phenomenon, as the ambiguity surrounding organizations provides actors ample opportunity to strategically construct meaning (Hartelius & Browning, 2008). Some studies that have used rhetorical analyses in an organizational context include an analysis of the role that language plays in promoting business process re-engineering (Grint & Case, 1998); a comparison of the rhetoric and reality associated with the implementation of Total Quality Management programs

(Zbaracki, 1998); and an investigation into the role rhetorical practice plays in facilitating the moral development of managers (Holt, 2006).³

Rhetoric has also been used in studies of legitimacy. For example, Suddaby and Greenwood (2005) used rhetoric to examine judgments of legitimacy of new organization forms in the accounting industry. Through an analysis of the rhetoric of various actors they found that shifts in institutional fields corresponded with shifts in the institutional logic, which created new criteria for legitimacy. They also found that when the criteria for legitimacy shifted, opportunities surfaced for new organizations to emerge. These findings are consistent with the work of Green, Babb, and Alpaslan (2008), whose work illustrated the manner in which shifts in rhetoric correspond with changes in the institutional field. Vaara, Tienari, and Laurila (2006) also examined legitimacy using a method resembling rhetorical analysis. Through a critical lens, these scholars identified a number of legitimation strategies used to validate a large-scale merger in Finland. Finally, Golant and Sillince (2007) contend that rhetorical analysis has the ability to consider both the actors' efforts to create a plausible argument, as well as to uncover the "taken for granted" nature of the narrative structure.

Researchers have investigated legitimating accounts to gain insight into an actor's social identity and infer the criteria upon which different actors base their conceptions of legitimacy (Greenwood & Hinings, 2005). W.E. Douglas Creed and associates (2009) used the textual analysis technique known as "framing" to examine discriminatory company policies against gay, lesbian, bisexual, and transgender employees. Previous work (c.f. Vaara, Tienari, & Laurila, 2006). that has adopted a similar micro-level discursive approach unveiled complex, contradictory, and ambiguous elements of rhetoric and we expect these characteristics will be

³ See Hartelius and Browning (2008) for a review of this literature.

visible in the rhetoric of the legitimating accounts surrounding the organic food institutional field (Whittle, Mueller and Mangan, 2008).

We utilized two main themes to guide our analysis of these phenomena. The first concerns the construction of the USDA definition of organic food in the context of a shifting institutional field. The second theme explored the intricacies of the various actors' legitimating accounts during this time. Central questions here include: how do these actors adapt their legitimating accounts to the changing context? Is there a discernible pattern to their rhetoric, not only over time, but also in relation to the other contemporary legitimating accounts? And finally, if patterns are evident, can they provide insight into the dynamics of legitimating sources in this institutional field?

1.1 Empirical Context

To conduct our analysis, we examined change in the organic food industry from 1990 to 2011, a period of time which encompasses a number of events that were critical in shaping the contemporary organic market in the United States. This analysis focused on a collection of manuscripts that detail how the term “organic” was contested among industry participants.

These include:

- minutes from the 1990 Joint Hearing of Congress regarding the proposed organic certification program;
- letters written by concerned citizens and groups to the United States Department Agriculture between 1997 and 1998 in response to the release of a draft of the certification criteria;

- selections from the National Organic Standards Board minutes from 2001 to 2011;
- transcripts from a 2011 listening session hosted by the National Organic Program.⁴

Outside of media accounts and advertising, these sources represent the extent of the public forum debates over national organic standards.

The organic food institutional field has at least two characteristics that make it an interesting topic for academic inquiry. First, the organic food industry has experienced a healthy rate of growth over the past two decades, evolving from a segment on the fringe of the American food market to a viable niche serviced by mainstream retailers such as Wal-Mart (Greene, et al., 2009). This growth has been driven, at least partially, by increasing consumer concern with the manner in which products are manufactured (Peterson & Janke, 2009). Second, while organic food sales still constitute a small part (approximately four percent) of overall food sales in the United States (Peterson & Janke, 2009), the influence of organic foods extends beyond sales figures and has arguably transformed organic food into accepted component of American society. Thus organic foods' influence carries beyond its four percent of market share and, at least indirectly, influences a large number of Americans.

Another interesting characteristic of organic food, in general, is that it has traditionally represented a challenge to the prevailing scientific norms (Guthman, 2004). As we will show in Chapter Two, many of the original organic producers question the value of conventional scientific knowledge. Organic practices and ideas tend to be legitimized through practical experience, or what Hoffman (2001) terms "external determinants," that are not necessarily based upon traditional scientific empiricism. However, as organic agriculture enters into

⁴ Our study does not include the period from 1991 to 1996 as, to our knowledge, no appropriate governmental documents exist. The NOSB began meeting in 1992, however full transcripts of their meetings were not provided for any meetings prior to 2001.

mainstream society, the rhetoric of rational and scientific logic are gaining traction (Drinkwater, 2009). By conceptualizing this study from the perspective of an institutional field, we have a mechanism to witness the dynamic interplay between mainstream science and other knowledge traditions.

1.2 Methodology

We employed content analysis software to assist in performing a rhetorical analysis of the various actors' legitimating accounts from 1990 to 2011. The dictionary used in this analysis was generated through both deductive and inductive strategies, following a similar process utilized by Doucet and Jehn (1997), as well as Kabanoff, Waldensee, and Cohen (1995). First, we constructed the deductive word list for pragmatic and moral legitimacy, starting with the terms used in Suchman's (1995) research. We then generated a list of synonyms of these words from the Oxford Thesaurus: An A-Z Dictionary of Synonyms (1991). After which, we constructed an inductive word list from a sample of our data. The inductive process was repeated until we adequately captured all the terms used by the actors to construct their legitimating accounts.

Content analyses have been employed in a wide range of studies within organizational studies in the past. For example, Mezas and Scarselletta (1994) used minutes from the National Accounting Standards Board to better understand the decision making processes in that organization. Andrew Hoffman (1999; 2001) also highlighted the utility of content analysis in his study of chemical trade publications, demonstrating that certain speech acts can uncover

organizational narratives that frame an event, issue, or belief in the organization in a particular way.

To conduct this analysis, we employed NVivo 9.0, data mining software to construct detailed classification systems from the texts. Once the analysis was complete, we performed additional post hoc quantitative analyses to assess the significance of these trends. Finally, because of both the qualitative and quantitative elements of this analysis, we employed a number of techniques to assess the validity of our study. For the quantitative measures, we calculated reliability, reproducibility, and discriminant validities (Krippendorff, 1980; Short et al., 2010). To determine the validity of our qualitative components, we drew from Tompkins' (1994) baseline measures for qualitative analysis; representativeness and consistency. We feel that our dataset adequately represents the discourse surrounding the creation and maintenance of a national organic standard because it contains samples from the entirety of the publicly-available transcripts concerning this topic. Related to the first point, we assert that the consistency, or the ability of other researchers to verify that we have accurately represented the text, is adequate, as the majority of these documents are still publicly available. We have provided copies of those letters that are no longer easily accessible in Appendix D.

1.3 Expected Findings

Our study is interested in the impact of regulations in this institutional field, particularly its influence on the way in which different actors frame their legitimating accounts; the rhetoric utilized by actors to construct a common meaning regarding the organization's legitimacy in an institutional setting (Creed, Scully, & Austin, 2008). We expected to find contradictions and

shifts in rhetoric of the various actors over time, however we expected each actor to offer a fairly-coherent narrative for short periods. We also expected the rhetoric of legitimating accounts to fluctuate along a continuum bracketed by strictly commercial appeals and deeply held philosophical beliefs. In the period leading to the public comment period regarding the proposed standards, we expect the rhetoric of the conventional food companies and the more mainstream element of the organic movement to converge around pragmatic issues. We believed this would occur for two reasons. One, as we shall see in Chapter 2, at this time both an element of the organic movement as well as the conventional food firms, were lobbying for federal standards, albeit for different reasons. During this time, the interests of these two camps were aligned. We expected the rhetoric to reflect this convergence of goals. And two, the organic movement was traditionally excluded from USDA policy formation. As these actors became more embedded in the federal certification process, we expected they would increasingly adopt the predominant language patterns of the system, thus signaling at least a partial integration into the world of agricultural policy formation (Nestle, 2005). Figure 1 provides a visual depiction of this process.

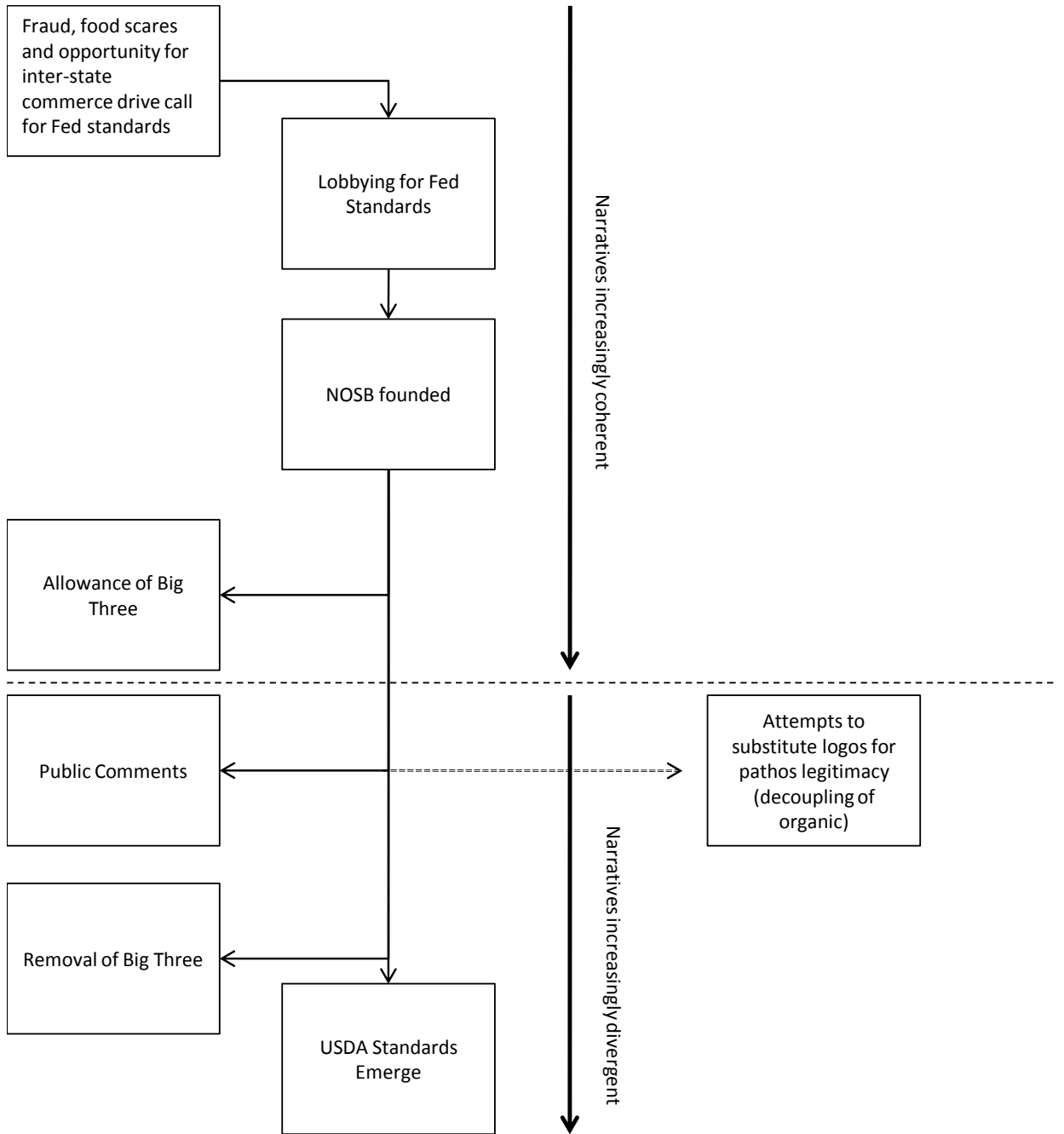


Figure 1. Illustration of Expected Findings

Thus, we anticipated the various legitimating accounts will not only be dynamic, but they will also assist the actors in avoiding potentially de-legitimizing situations. Our analysis will provide a greater understanding of both the criteria for legitimacy in an evolving institution and may also represent a mechanism for identifying the shifting sources of legitimacy in this field. Elements of our findings should be consistent with Ingram and Ingram (2005) who demonstrated that the passage of the USDA organic standards was due, in part, to a convergence of the interests of small farmers and larger organic producers. However, after the passage of USDA certification, we expected these arguments to diverge, as the organic movement attempted to differentiate itself from conventional and organic corporate producers. We suspected a significant element in the organic movement to continue to define legitimacy through moral and normative criteria, which would confirm Greenwood and Hinning's (2005) finding that opponents of change were more likely to evoke traditional values of the institutional field. We also suspected that conventional firms to continue to employ pragmatic legitimacy arguments, particularly employing themes of cost reduction and free trade. There is a possibility, however, that the conventional food companies will co-opt the moral legitimating accounts of the organic movement, as previous research has illustrated the manner in which large corporations employ pastoral images to sell organic products (Howard, 2009). Yet, we are unsure if such marketing strategies will appear in our dataset, as it is characterized by a higher level of accountability than most marketing campaigns.

It is our hope that, through this analysis, we will come to a greater understanding of not only the prevailing perceptions of legitimacy during times of institutional upheaval, but to also shed light on the manner in which legitimating accounts shift and transform during such times.

And as such, gain an indirect perspective into the changes in authority that occurs when institutional pillars shift.

1.4 Expected Contributions

This study offers a potential contribution to institutional theory, as we suspect this is the first effort to use legitimating accounts as a mechanism to identify legitimating sources. Furthermore, we expect the research to contribute additional richness to institutional theory by tracing the complexities in constructing legitimating accounts when actors are presented with shifting institutional pillars. For practitioners, we feel this research can assist managers in identifying successful strategies to create and sustain legitimacy in a value-laden institutional field such as organic food.

1.5 Guide to Dissertation

The remainder of the dissertation is organized as follows. Chapter 2 provides the historical context of the study and presents a review of the relevant literature. Chapter 3 outlines the details of the methodology used in this study. Chapter 4 recounts the findings of the analysis. Finally, in Chapter 5 we discuss the implications, limitations, and potential future avenues for this research.

CHAPTER 2

LITERATURE REVIEW AND EMPIRICAL CONTEXT

“Can the tenets of organic food and farming be stretched (without ripping) to include organic, instant, single-serving, cups-of-soup, organic frozen dinners and organic junk foods?”

(DeLind, 2000, p. 2003)

At the broadest level, we approached this study from an economic-sociological perspective. As such, we are concerned with the behavior of economic actors in relation to social norms (Dobbin, 2004). Particularly, we draw from the work of Neil Fligstein (1991) in order to analyze markets as institutional fields. Hoffman (2001) characterized an institutional field as a pluralistic landscape that coalesces around the negotiation of the interpretation of a particular issue. When applying the theory of fields to markets, it is necessary to consider the rules and norms required to stabilize the exchange relationship between the economic actors in the field. The theory of fields assumes that actors are continuously engaged in the creation of local meanings that provide dominant actors the opportunity to reproduce their power (Fligstein, 1991). Scott offers a distinction between the field and the population. A field consists of “those organizations that, in aggregate, constitute a recognized area of institutional life: key suppliers, resource and product consumers, regulatory agencies, and other organizations that produce similar services or products” (Scott, 2001; p. 86).

In contrast, populations, or occupational communities, are a coalition of actors from various organizations that have a shared understanding of the central issues and employ a common language (Schein, 1996; Scott, 2001). For the current study, an institutional field represents a space in which certain practices are legitimized and/or delegitimized (Hoffman,

2001). We view the organizations involved in establishing the federal definition of organic food to comprise an institutional field; characterized by rules and structures that guide the exchange of goods and simultaneously enable certain actions while constraining others (Green, Babb, & Alpaslan, 2008). The current study focuses upon the behavior of the actors involved in the production and distribution of the goods. We paid particular interest to the manner in which different actors forward their legitimating accounts. In our study, we recognize five populations: movement farmers, commercial organic growers, governmental representatives, conventional food companies, and inspectors.

Legitimation plays a key role in institutional fields and the process of institutionalization. In institutional fields, legitimacy provides an organization access to critical resources (Meyer & Rowan, 1977). In the process of institutionalization, legitimacy serves as a “prerequisite” for the diffusion of ideas or practices (Vaara, et al., 2006). In the following section, we discuss previous work regarding legitimacy and organizations that are germane to our study.

2.1 Legitimacy

The current research is concerned the social dynamics of the organic industry and, like Fligstein (1991), we draw from institutional theory to inform our work. Of particular interest is the concept of legitimacy. The work of Max Weber is most often credited with the introduction of legitimacy into sociological inquiry (Deephouse & Suchman, 2008). Since then, the acquisition and maintenance of legitimacy has remained as a critical issue for organizations (Gollant & Sillince, 2007).

Scott (2001) proposed the analogy of three pillars to denote related, but distinct, forces that contribute to the institutionalization process and thus, legitimacy; regulative, normative, and

cultural-cognitive. The regulatory pillar consists of explicit regulations, rules, and laws. The normative pillar prescribes the appropriate values dominant in particular contexts. Finally, the cultural-cognitive pillar is defined as the “shared conceptions that constitute the nature of social reality and the frames through which meaning is made” (Scott, 1991, p. 57).

Following the guidelines of Scott (2001), Suchman (1995) identified three types of organizational legitimacy associated with those pillars, pragmatic, moral, and cognitive. In order to gain pragmatic legitimacy, an organization must be perceived as a representation of the prevailing archetype in a given context (Golant & Sillince, 2007). Suchman (1995) further distinguished three particular types of pragmatic legitimacy: exchange, influence, and dispositional. An organization achieves exchange legitimacy when the actors that maintain sovereignty over the organization determine that bestowing of legitimacy serves those actors' best interests. In other words, the actors with sovereignty (i.e. the legitimating source) legitimize the actions of the firm in exchange for something of value. In situations of influence legitimacy, the source of legitimacy perceives the organization as a representative of their interests and therefore legitimizes the organization's actions. Oftentimes, the source of legitimacy co-opts the organization by persuading the organization to adopt its performance standards in exchange for a positive assessment of legitimacy. Finally, with dispositional legitimacy, the legitimating source anthropomorphizes the organizations, endowing them with desirable traits and values. In this context, organizations gain legitimacy by exhibiting desirable human traits such as trustworthiness and decency (Suchman, 1995).

Moral or sociotropic legitimacy, the second type of organizational legitimacy corresponding with Scott's (2001) pillars, rests on the degree of congruence between an organization's actions and the established normative order. This type of legitimacy differs from

other types of legitimacy because these assessments of legitimacy are not based on transactions; rather the organization derives legitimacy through an assessment of its perceived morals. Suchman (1995) identified three bases for the evaluation of moral legitimacy; outputs and consequences, techniques and procedures; and categories and structures. Consequential legitimacy refers to the quality and value of an organization's product or service. While at first glance, one may assume this type of legitimacy is more closely aligned with pragmatic legitimacy; however because the legitimacy judgments of the technical properties of the organization rely more upon a subjective and socially-constructed conception, it inhibits the ability of the legitimating sources to empirically observe the necessary criteria (Meyer & Rowan, 1991; Suchman, 1995). Lacking substantial assessment criteria, legitimating sources tend to turn to evaluations of morality (Suchman, 1995; Thompson, 1967). Thus, when ambiguity is high, the likelihood of moral assessment increases. When the criteria upon which the organization's outcomes are ambiguous, legitimating sources may also turn to procedural legitimacy, as oftentimes the procedures employed by the organization demonstrate that the organization is making an effort to conform to existing norms and values. This form of legitimacy is especially prevalent in professional activities that accept variable results, where methodologies are often ritual enactments representing the core principles of the legitimating source (Meyer & Rowan, 1977; Suchman, 1995).

The final form of moral legitimacy, structural legitimacy,⁵ depends on the organization's capacity to perform certain actions that will locate it within a favorable taxonomic category and signal to its constituents that it is committed to engage in socially acceptable practices.

Procedural and structural legitimacies may blend together, but one can distinguish procedural by

⁵ Otherwise known as *categorical* legitimacy (Zucker, 1986).

its focus on routines, whereas structural looks more towards general organizational features (Suchman, 1995).

All three types of legitimacy share the perspective that the activities of the organization are appropriate within a socially-constructed, normative framework, but each has a different behavioral dynamic. Pragmatic and moral legitimacy "rest on discursive evaluation...Audiences arrive at cost-benefit appraisals and ethical judgments largely through explicit public discussion, and organizations can often win pragmatic and moral legitimacy by participating vigorously in such dialogues" (Suchman 1995; p. 585).

Although other authors have categorized legitimacy in different ways (see for example, Aldrich, 1999; Dobrev, 2001), each conceptualization including Suchman's, contain a number of common elements. Each arises from socially constructed processes that require a modicum of perceived consensus and a cognitive, as well as, a normative component. Additionally the cognitive component of legitimacy for each conception of legitimacy imbues a sense of validity, whereas the normative component contains the prescriptive nature of the object or process (Johnson, Dowd, & Ridgeway, 2006). In this study, we utilized Suchman's conception of legitimacy for its emphasis on the moral and pragmatic elements, as well as its recognition of the central role of rhetoric in judgments of legitimacy.

2.2 Benefits of Legitimacy

We argue that the production of organic agriculture has not reached a taken-for-granted status in American society, an indication that organics have yet to develop cultural-cognitive legitimacy (Rowan & Meyer, 1977; Suchman, 1995). Therefore, we omit cultural-cognitive

legitimacy from our analysis, and instead focus on pragmatic and moral legitimacy. We focused on these types of legitimacy for two additional reasons. First, organizations tend to promote their pragmatic and moral legitimacies upon founding in order to secure critical resources. When an organization is founded, pragmatic and moral legitimacy can mobilize resources by emphasizing the value of the organization's processes and products to resource holders. At the time of founding, organizations also tend to emphasize their ethical validity, the degree to which their firm fits with the current institution (Golant & Sillince, 2007; Meyer & Rowan, 1977). The extent to which an organization receives an allocation of resources is a function of the extent to which the resource holders accept the firm's claims. The second reason our study is concerned with pragmatic and moral legitimacy is that new organizations tend to suffer from a cognitive legitimacy deficiency, as resource holders without a history of the organization's past performance are unable to assess its reliability (Golant & Sillince, 2007).

While legitimacy may bestow certain benefits upon the organization, it is also important to recognize what Suchman (1995) claimed was the dual nature of legitimacy. Legitimacy assessments may enable certain activities, but they can also constrain others. The origins of this idea can be traced back to Giddens's structuration theory (1984), which claims that the rules or routines of social action are the same rules that reproduce the structure of society.

2.3 Legitimacy and Evolving Institutional Fields

When an institutional field is stable or contains clearly-identifiable boundaries, Scott's (2001) conceptualization of the three types of legitimacy provides a useful tool in the identification of legitimating sources. Organizations derive *regulative* legitimacy from actors

exercising sovereignty over the organization. Actors that consider the organization to embrace the norms and beliefs bestow *normative* legitimacy upon the organization. Finally, *cognitive* legitimacy occurs when the organization reaches a taken-for-granted state. In other words, when an organization reaches perfect cognitive legitimacy, alternatives are inconceivable (Meyer & Scott, 1983).

However, institutional fields eventually evolve and the criteria for legitimacy invariably shifts. Jepperson (1991) noted this phenomenon when he argued that the degree of institutionalization of actions varies over time. Jepperson recognized the importance of context as well, asserting that particular actions may be considered legitimate by one audience and not another. Thus, the criteria for legitimacy are not only dynamic, but they also vary from audience to audience. Reuf and Scott's (1998) study of the hospital industry provided empirical support for Jepperson's assertion and demonstrated how the salience of legitimating sources shifted as the industry experienced changes in the dominant values of the environment. For example, they show how during an era of increased federal involvement, the salience of technical legitimacy increased. They suggested that future research devote greater attention to the varying sources of legitimacy, such as the influence of context (Reuf & Scott, 1998).

Changes in legitimacy criteria can occur for a number of reasons, such as when an institution conflicts with its environment or another institution (Jepperson, 1991), lacks definition (Suchman, 1995) or experiences exogenous shocks (Jepperson, 1991). Jepperson (1991) also suggests institutions may change through procedural rationality. Related to this concept is the local interpretation of sanctions from a centralized authority.

Max Weber was one of the first to recognize the discrepancy between centralized authority and localized adoption by making the distinction between sanctions and norms (Reuf &

Scott, 1983). This observation is in line with Meyer and Scott's (1983) argument that universal standards often clash with local, autonomous actors when they are applied to local settings. Thus, the original intent of an edict from a centralized authority is subjected to a process of local interpretation which results in an outcome that may not always be congruent with the original intent. In the next section, we trace the evolution of organic agriculture in order to illustrate the shifts in norms that influence the perceptions of legitimacy at different times.

2.4 Legitimacy and the Organic Food Industry

In order to understand the criteria for legitimating judgments prevalent in the organic agriculture movement in the United States, it is important to understand the context from which it evolved. We use the creation of the USDA organic standards to bracket three periods in the evolution of the US organic food system: the period prior to federal standards (pre-1997), the period between the release of the original USDA proposals and the start of their enforcement (1997-2002), and the period after the standards went into effect (post-2002).

2.4.1 The Pre-certification Era (pre-1997)

The earliest proponents of organic agriculture considered it to be an alternative to the modern, industrial agriculture system (i.e. conventional agriculture) which can be traced back to the mid-1800s (Drinkwater, 2009). Conventional agriculture practices developed in conjunction with the emergence of the USDA, Land Grant Universities, Agricultural Experiment Stations, and the Cooperative Extension Service. Together, these organizations provided an effective knowledge diffusion strategy for modernized conventional agricultural practices. The Experiment Stations developed the new techniques; the Land Grant Universities taught those

techniques to agriculture students; and the Extension Service disseminated the techniques to farmers. The New Deal's Agricultural Adjustment Act of 1933 further fortified conventional agriculture in the US by instituting a number of agricultural programs that provided government support to large, specialized farms (Constance, 2010).

The majority of the research conducted by the conventional agricultural system utilized a reductionist approach. Researchers attempted to isolate and control variables in order to develop larger-scale, specialized approaches that separated animal and crop operations and focused on a narrow range of commoditized products (Constance, 2010). This resulted in a displacement of smaller, diversified farms and pushed the average farm size higher. By the 1950's, the industrial manufacturing approach to agriculture had become entrenched in the conventional U.S. food system (Constance, 2010; Guthman, 1998; Ingram & Ingram 2005).

The modern interpretation of organic agriculture, often traced back to the 1940s and the teachings of Sir Albert Howard of Great Britain, evolved out of a form of resistance to the rapid industrialization of the agriculture system in places like the United Kingdom and the United States. Organic advocates tended to adopt a broader philosophical approach that questioned the ecological and social impacts of conventional agriculture (Drinkwater, 2009; Guthman, 1998; Ingram & Ingram, 2005). Of particular concern to early organic proponents were conventional agriculture's tendencies to reduce soil health, consume natural resources at an unsustainable rate, and substitute oil consumption for ecological health (Kirshenmann, 2009).

Organic agriculture: 1960-1979.

The "Back to the Landers" and the Baby Boomer's growing interest in health foods provided demand for the first growth phase of the organic movement between 1960 and 1970

(Greene, 2000; Guthman, 1998). At this time, the primary outlets for organics were the food cooperatives and collectives (Guthman, 1998).

JJ Rodale, the publisher of *Organic Farming* was possibly the earliest U.S. advocate of organic farming (Greene, 2000). He was also the driving force behind an early effort of organic certification. In 1971, he launched a certification entitled “Rodale’s Organic Gardening and Farming” program in California. It eventually grew to encompass groups in 20 states, but was phased out after two years because Rodale felt that certification programs were best left to local producers and consumers (Lee, 2009).

Around the same time as the Rodale certification program was ending, new state laws regarding the production of organic food emerged. The first state sponsored certification program began in Oregon in 1973. Title 616 of the Oregon Revised Statutes provided key definitions and outlined procedures for organic production, while also providing punitive measures for producers who failed to meet these standards (Lee, 2009). The California Certified Organic Farmers (CCOF) followed later in 1973 with the purpose of combating fraud (Marshall & Standifird, 2005; Greene, 2000; Guthman, 1998). The label also served as a legitimizing vehicle for the farmers who were able to meet the CCOF’s criteria, thus representing some of the earliest institutionalizing effects upon the organic food industry (Marshall & Standifird, 2005). Massachusetts followed with their own standards in 1978. In 1979, Maine, California, and Connecticut all adopted laws specifying the standards of organic food production (Lee, 2009).

Also around this time, in states such as California and Oregon, consumers began to consider organic agriculture as a viable alternative to the conventional industrial agricultural model (Ingram & Ingram, 2005). While organic farming techniques had made some inroads into the collective conscious of the industrial agriculture system at this time, USDA Secretary Earl

Butz allayed any doubt that mainstream America still considered organic techniques to be a relic of the past (Ingram & Ingram, 2005; Nestle 2005). In a series of disparaging remarks in 1971, Butz insinuated that organic practices were incapable of feeding a growing national population stating, “before we go back to organic agriculture in this country, somebody must decide which 50 million Americans we are going to let starve or go hungry” (Butz, 1971, quoted in Lockeretz, 2007; p. 3).

The organic agriculture movement also faced opposition from mainstream science at this time. In 1974, a panel of experts from the American Association for the Advancement of Science denigrated organic food as “scientific nonsense” and a myth. Media outlets also joined the chorus against organic food, claiming that organic food advocates relied upon “scare tactics to dupe consumers into over-paying for food” (Washington Post, 1974, quoted in Lockeretz 2007; p. 3).

Organic agriculture: the 1980’s.

The 1980s represented an era of transition in the organic food industry. The events that transpired during this time set the foundations for the dramatic changes that beset the industry a decade later. This time period was witness to an expansion of market demand, the emergence of federal support, shifts in the supply chain, and a revision of terminology. Organic food experts attribute the rapid growth in the demand for organic food during this time to well-publicized food scares, the opening of a number of upscale organic restaurants, and the emergence of large scale organic food retailers (Greene, 2000; Guthman, 1998; Peterson & Janke, 2009).

This time period was also characterized by increased polarization over the incipient commercialization of organic products. On one side of the issue were those dedicated to the

moral foundations of organic agriculture and decried the gentrification of the organic food industry. While on the other side resided those parties willing to de-emphasize the tenets in order to realize the full market potential of these products (Guthman, 1998; Marshall & Standifird, 2005).

The 1980 USDA's "Report and Recommendations on Organic Farming" validated organic agriculture to an extent. The report outlined the principles of organic agriculture and provided scientific evidence of the viability of sustainable techniques. One of the most striking findings in this report was that government scientists, using organic practices, were able to generate crop yields similar to those produced by conventional techniques. To further validate organic methods, the report concluded with the recommendation that the USDA needed to develop education programs and policies to promote organic agriculture and assist farmers looking to transition into organic production (Lockeretz, 2007). While stated support for organic agriculture may have been growing in the United States federal government, monetary support was minimal and early efforts to introduce federal legislation in favor of organic techniques were largely unsuccessful (Ingram & Ingram, 2005).

The 1980s also witnessed organic farmers increasingly moving away from direct consumer sales and towards conventional marketing outlets; foreshadowing the formation of a global organic market in the 1990s (Peterson & Janke, 2009; Schmid, 2007). The expansion of the organic market increased the importance of the certification agencies. Initially the impact of the certifying agencies was minimal, as most growers were part of small, local communities that relied upon cooperation rather than regulation to ensure standards (Schmid, 2007). During that time, growers primarily utilized direct sales channels or cooperative buying clubs such as

Community Supported Agriculture shares (CSA),⁶ farmers' markets, restaurants, and co-operative markets (Peterson & Janke, 2009). However, as the industry grew, new market participants, along with rising demand, required significant changes to the supply chain. As a result of these trends, a network of packers, wholesalers, processors, and retailers evolved from the direct sales system of the past (Peterson & Janke, 2009). One of the earliest to form was the Organic Crops Improvement Association.

In 1986, the Organic Crops Improvement Association (OCIA) was formed featuring a federated structure with chapters in U.S. states and other countries. As a federated structure, the national organization created the standards which the local chapters would carry out via certifications and inspections. In addition to the OCIA, there was an increase in the number of state sponsored certifying agencies. In total 35 states had passed vastly different guidelines relating to the production and definition of organic food (Lee 2009). Adding to the number of interests in this industry, numerous trade associations formed to represent the industry in the political arena. The largest one, the Organic Trade Association (OTA)⁷ was founded in 1985. The OTA was a member of the Organic Food Alliance (OFA), a group whose purpose was to establish guidelines regarding the use of the term organic. One of the Alliance's main tasks was to prevent the term organic from being diluted to point of meaninglessness, a fate befallen by the term "natural," a similar designation from a previous generation (Peterson & Janke, 2009).

While the new certifying agencies moved the industry towards greater clarification regarding the organic label, the "patchwork of standards" created numerous problems as well

⁶Community supported agriculture shares function as a "subscription" to a farm's output over the course of the growing season that is generally paid at the beginning of the season. This arrangement is advantageous for the farmer as they are able to receive some or all of the payment before harvest, allowing them to devote the capital to in-season operating expenses. CSAs also provide guaranteed sales for the farmer (Peterson & Janke, 2009).

⁷ Originally known as Organic Foods Production Association of North America.

(Greene, 2000; Greene et al. 2009; p. 21988; Ingram & Ingram, 2005). Particularly, the inconsistencies between the various state standards caused disagreements among certifying agencies regarding the applicable standards for products that were comprised of more than one ingredient. Multiple standards caused problems with interstate shipping as well, as each destination required its own certification process (Greene, 2000).

The OFA sought to reform the organic food industry, but preferred to do it from within this “system.” This approach generated criticism from the movement farmers who claimed the OFA supported and were engaged in a corrupt system. The OFA also tended to downplay the social justice issues associated with the alternative agriculture movement, instead choosing to focus on governmental oversight and safety, which further incensed the movement farmers (Peterson & Janke, 2009).

By the end of the 1980s, the organic food industry had grown to the point that federal government oversight was needed (Marshall & Standifird, 2005). Three main factors emerged that increased the need for oversight and spurred the passage of the 1990 Organic Food Production Act. They included industry group preferences to develop standards to facilitate trade, increasing incidents of fraud, and growing consumer demand for organic goods (Greene, 2000; Marshall & Standifird, 2005).

Organic agriculture: the 1990’s.

The 1990 Organic Foods Production Act (OFPA) was intended to address the problems encountered in the earlier years of organic food such as consumer fraud and difficulties with interstate trade (Greene, 2000). The act called for the establishment of the National Organic Standards Board (NOSB), a group designated with the task of developing national standards.

Many hoped these new standards would enforce quality standards for organic food products, encourage inter-state commerce, boost consumer confidence and prevent smaller organic producers being acquired by large agribusiness corporations (Greene, 2000; Marshall & Standifird, 2005). Support of the federal legislation was broad and included various certifying agencies, organic farmers, state governments, sponsors of previous organic bills,⁸ and the Center for Science in the Public Interest (Greene, 2000). However, while the bill passed, political wrangling delayed the creation of the NOSB for another two years (Guthman, 1998).

Throughout the 1990s, most consumers purchased organic goods because they were seen to be healthy, nutritious, and environmentally-responsible (Guthman, 1998; Hartman Group, 2002; Ingram & Ingram, 2005; Lockeretz, 2007). The popularity of organic foods was further bolstered by the success of organic advocates in promoting their perspectives and policies to the public (Lockeretz, 2007). Moreover, after a few well-publicized scares involving pesticides in food, a new segment of consumers driven by safety issues began seeking out organic products (Peterson & Janke, 2009).

At this time, the prototypical organic consumer was well-educated, upper income and Caucasian (Peterson & Janke, 2009). Yet, one result of this broader appeal of organic products was the emergence of a new consumer segment. These new consumers tended to emphasize the ecological and safety elements of organic foods while glossing over the counter-culture foundations. The emergence of this new organic consumer provided greater credence to those in the organic camp looking to broaden the commercial appeal, while simultaneously widening the rift within the institutional field (Lockeretz, 2007).

Alternative certification programs also surfaced around the same time the OFPA was passed. These generally were non-accredited agencies that provided standards that were either

⁸ Including Peter DeFazio (OR), Gary Condit (CA), Wyche Fowler (GA), and Richard Lugar (IN).

more stringent than federal standards, or addressed issues not present in the USDA proposed definition of organic. Some of the more well-known ones included the Food Alliance (FA) and Certified Naturally Grown. For many, the allure of these alternative certifying programs rested in the fact that they were not federal standards (Marshall & Standifird, 2005).

During the 1990s the organic food industry began to take shape as rising demand, a shifting consumer base, and new federal legislation helped transform an industry from a traditionally local focus, into an economic sector that featured a global supply chain and an increasingly corporate presence. Consumer demand for organic products continued to grow in the 1990s, as consumers remained willing to pay premiums for these organic products (Greene, 2000). These events occurred within the context of more calls, as well as concerns, for federal oversight of the organic food industry beyond the provisions provided by the 1990 OFPA. As the probability of federal standards increased, so too did the opposition to governmental oversight of the organic industry. In the next section, we explore the concerns revolving around federal standards prior to the passage of the Final Rule.

2.4.2 The Era of Uncertainty (1997-2002)

By the time federal regulations were introduced, the term organic had come to represent a broad range of agricultural management strategies including those rooted in the early conceptions of organic farms, techniques that substituted natural ingredients for conventional inputs, as well as more narrowly-defined strategies such as bio-dynamic (Drinkwater, 2009). In 1997, based on the National Organic Standards Board recommendations, the United States Department of Agriculture drafted Federal Register (62 FR 65850), which sought to clarify the meaning of organic and outlined the rules regarding organic production. The stated intent of the

standards was to promote organic agriculture, support its economic aspects, and adhere to the social and ecological dimensions (Buck, et al. 1997; DeLind, 2000; Gibbon, 2008). However, the controversial inclusion in the list of approved substances - genetically modified organisms, sewage sludge, and irradiated products - prompted over 275,000 comments to be posted on the USDA website; the largest public response in history to a USDA announcement (DeLind, 2000; Greene, 2000). Most of these comments came from consumers concerned that the term had become co-opted by large, conventional agricultural companies.

Much of the criticisms levied upon federal oversight of the organic food industry drew at least indirectly from the works of Harriet Friedman (1980) and Henry Bernstein (1981). Both authors contended that the introduction of capitalism to an agricultural production system commoditized the means of production and distribution; separating the farmers from their land and providing opportunities to introduce industrial methods and synthetic inputs such as fertilizers and pesticides (DeLind, 2000; Goodman, 2000; Guthman, 1998; Gibbon, 2008). These practices stood in stark contrast to the foundational values of early organic agriculture which included environmental preservation, worker rights, equal access to the means of production, safe food, respect for local knowledge, and democracy (DeLind, 2000; Sligh & Cierpka, 2007). Many in the movement considered any federal mandate was inevitably an oversimplification and therefore, ill-equipped to properly reflect the values of the organic agriculture community (DeLind, 2000; Guthman, 1998).

Buck and his associates (Buck, Getz, & Guthman, 1997) coined the term “conventionalization” to describe the expected impact of governmental regulations on organic food production⁹ and many of the arguments in these studies appeared later in the opposition to

⁹ Although the original studies were conducted in California, subsequent research attempted to increase the generalization of the findings to a national level.

USDA proposals. The conventionalization argument consists of two related components. The first stated that once government defines the standard criteria for organic food, larger agribusiness firms would be attracted by the industry's rapid growth and high margins. The second maintained that these new organic agribusiness firms would focus on the "most-lucrative" aspects of organic production stripping the practices of its ethical foundations (Buck, et al., 1997, Guthman, 1998; 2000; 2002; 2004; 2004b; Howard, 2009).

Guthman (2004) argued that the conventionalization of organic farming detached the social and ecological imperatives from the production processes, eventually leading to a loss of biodiversity and the eventual demise of the small farmer (Guthman, 1998). Conventionalization would essentially render organic agriculture another "resource dependent" industry. Corporations would use natural imagery as a marketing tool and drop the standards of production. As such, these trends would remove barriers that previously discouraged large scale investments and potentially drive small farmers out of business (DeLind, 2000; Gibbon, 2008; Guthman, 1998; Klintman & Bosman, 2004).

Critics felt this trend would perpetuate the same inequitable system as conventional food products; wealth would be concentrated, natural resources would be commoditized, and labor would be exploited (DeLind, 2000). Those on the movement side argued that conventionalization would also force farmers to reduce labor costs, centralize their operations, and focus on volume. In other words, organic farmers would have no choice but to adopt the conventional farming model or exit the industry (Peterson & Janke, 2009). Federal standards were also feared to disproportionately tax smaller growers, as farms with annual sales greater than \$5000 would be required to pay for certification (Greene, 2000).

Many in the organic movement became suspicious of the USDA's role in the regulation of organic food. A representative response from this perspective argued the USDA was attempting to "highjack organic agriculture" (Ingram & Ingram 2005; p. 121). However, others in the organic community felt the most pragmatic solution would be to continue working with the USDA (DeLind, 2000). In fact, many organic advocates felt USDA standards marked an important phase in the evolution of the organic agriculture movement and viewed them as a "major policy achievement" (Ingram & Ingram, 2005; p. 122). For this side, the USDA standards and the labeling guidelines were "necessary steps" to advance the organic industry and these standards proved to significantly alter the organic food industry (Francis, 2009).

The proposals further divided the organic agriculture community and the presumed inevitability provoked an existential crisis within the movement. As one author stated "as conventionalization proceeds in organics, sustainability recedes" (Constance 2010; p. 54). Organic advocates argued that with USDA certification, a "lowest common denominator set of requirements" (Howard, 2009; p. 14) had been enacted, divorcing the original meaning of organic from many, if not all, grassroots efforts.¹⁰ Another quote that captured the spirit of the organic movement at this time came from a representative from the Organic Crop Improvement Association. Universal standards, he maintained, would "take the religion out of certification and make it just like getting a driver's license" (quoted in Guthman 1998; p. 144).

As evidenced by the backlash to the federal standards, organic food production represented more than a technique for growing food. For many, the potential for governmental mandates stirred deeper concerns, such as the nature of governmental oversight in general.

¹⁰ Gibbon (2008) questions this interpretation on the basis that effective standards provide differentiation for organic products.

2.4.3 The Impact of Certification (post 2002)

Federal standards legitimized organic production and signaled mainstream acceptance for an approach that, only twenty years prior, solely existed on the periphery of agriculture (Howard, 2009; Ingram & Ingram, 2005). In this section we will explore the impact of regulations upon sales, organic consumers, industry structure, food policy, and the certifying agencies.

Sales.

Although federal standards had no discernible impact on overall sales figures for organic foods, the industry continued to grow after the passage of the regulations (Howard, 2009; Greene et al., 2009). From 1997 to 2005, the industry has maintained a rapid 20% annual growth rate, with processed foods leading the way (Howard, 2009). Moreover, organic acreage has doubled and organic production occurs in every state in the U.S. Yet the potential for growth persists, as there is less than one percent of total crop land in the U.S. has been certified (Greene et al., 2009).

In the first years after federal regulation, the demand of organic products was so great that resources could not match demand, inhibiting the growth of the sector. In 2004, 44 percent of U.S. handlers were unable to source enough ingredients or products. As a result of the inability of the domestic supply to meet demand, the United States increased its number of organic imports (Greene et al., 2009). By 2007, there were 11,000 USDA certified producers and handlers in over 100 countries; nearly matching the number of domestic producers (16,000) (Greene et al., 2009).

Organic consumers.

The economic downturn in 2008 had a nominal effect on the industry as a whole, as many regular purchasers of organic food products continued their purchasing behavior. Yet, the economic conditions may have resulted in a loss of some of the less frequent consumers and may have discouraged new consumers from purchasing organic goods. Both groups were likely deterred by the premiums associated with these products (Greene et al., 2009; Peterson & Janke, 2009).

While the reasons for not buying organic products have been relatively apparent, it has become increasingly difficult to determine why the typical consumer purchases organic products, or to even characterize the typical organic consumer. Traditional indicators, such as income or ethnicity, are no longer accurate (Peterson & Janke, 2009). Recent surveys have found that consumers who regularly purchased organic foods were willing to pay a premium to support environmentally-benign agricultural practices and to know their food was free of pesticides and genetically-modified ingredients. Additional factors driving organic food purchases mostly revolve around food safety issues, such as concern over antibiotics and growth hormones in milk, meat, and eggs. Researchers have argued this finding demonstrates a shift towards personal, rather than societal, benefits (Peterson & Janke, 2009).

Industry Structure.

Federal standards have also facilitated significant structural change in this industry. In their study of organic farming in California during the 1990s, Buck and associates (1997) predicted that consolidation in the organic food industry was more likely to occur in “near- and off-farm” processes, including processing, retail, and distribution, rather than the actual

production of organic goods. Buck et al. (1997) suspected that a number of barriers existed for large firms to enter organic production. These included the costs to acquire land, extensive time commitments, and the risk associated with biological factors, such as pests and inclement weather. And while these barriers have prevented entry in the past, today there is a burgeoning trend towards organic production consolidation, particularly in California (Howard, 2002). While the two barriers identified by Buck and associates (1997) remain, another barrier identified in their study has already eroded; the social movement character of organic agriculture (Howard, 2009).

The retail sector of organic foods, which has arguably experienced the greatest changes, provides a clear example of horizontal integration. Natural food stores were almost the exclusive outlet for organic foods up until the late 1990s. However by the late 2000s, market share for these retailers began to decline as new entrants such as Safeway, Kroeger, and Wal-Mart drove down margins (Howard, 2009; Peterson & Janke, 2009). However, the percentage of market share has not been the only major change to the organic food retail sector; it has also experienced a period of increased consolidation. In the 1990s, 13 major natural food retailers existed in the market; however by 2008, only three remained (Peterson & Janke, 2009).

As such, consumers seeking alternatives to conventional agricultural practices now have fewer options from which to choose. This is also due to a trend over the past 15 years of consolidation with conventional firms acquiring smaller organic producers. After the purchase, the corporate parent often obscure its ownership; a tactic known as stealth ownership (Howard, 2009; Greene et al., 2009). Examples of stealth ownership include Danone (Stonyfield Farm and Brown Cow yogurts), J.M. Smucker (After the Fall Juice), and a collaborative investment

between the state of Iowa, Pioneer, DuPont, and Archer Daniel Midland (Rudi's Organic Bakery) (Howard, 2009).

Moreover, the appearance of alternative "environmental" food labels and seemingly-organic labels has increased the level of competition for the organic market share. Labels such as Fair Trade, Ecologically-Grown, Local, as well as private organic brands, have been able to thrive in the space created by the federal standards (Gibbon, 2008; Greene et al., 2009; Howard, 2009). The "local" designation is another example of the new challenges to the organic market. Because this type of designation is still fairly new, the definition has yet to be standardized. Sometimes it relates to a physical distance, sometimes to political boundaries (Howard, 2009; Peterson & Janke, 2009). Moreover, the market distinctions between organic and local are still not fully understood, as experts are still uncertain how consumers perceive the trade-offs between the two claims (Peterson & Janke, 2009).

Adding to the competition in the organic market has been the consumer trend to place certification above brand (Howie, 2004). This has encouraged larger food processors to engage in concentric diversification; a process in which firms develop a private organic label for large retailers (Peterson & Janke, 2009). Although some of the private labels are entirely organic, other conventional products attempt to create a halo effect around products that do not qualify as organic by employing names that suggest pastoral or natural images (Howard, 2009). Oftentimes the private label products are co-packed with their conventional counterparts. One indication of the prevalence of this practice surfaced during the 2006 *E.coli* outbreak in packaged spinach. As the bags were traced back to their point of production, it became clear that organic brands such as Natural Selection/Earthbound Farm were being packaged in the same facilities as conventional Dole brands (Greene et al., 2009).

Another type of concentric diversification is the introduction of organic versions of existing brands. Part of this push originated from Wal-Mart's encouragement of Kellogg to develop Organic Rice Krispies and Keebler Organic Crackers. Other examples include well-known products such as Nabisco Oreos and Kraft Macaroni and Cheese. However, these are not typical examples; concentric diversification in the organic food industry usually involves products already established in the organic markets such as bagged greens, tomato products, juice, and ice cream (Howard, 2009).

Certifying agencies.

Another element of the organic food industry impacted by federal regulations has been the certifying agencies. The federal standards mandated by the National Organic Program to utilize existing third-party certifying agents created a system in which private and state certification agencies could coexist. This arrangement allowed for certifying agencies to establish standards that exceed national guidelines or address issues omitted by the USDA, such as social or environmental criteria. A recent study by Marshall and Standifird (2005) looked at three different certifying agencies and concluded that national standards could either enhance or inhibit the competitiveness of these agencies, depending on their existing resource bundles. Organizations that incorporate the standards into their existing resource bundle can improve their performance. One example of this was Quality Assurance International (QAI). Certifying agencies could also enhance their competitive position by resisting isomorphic pressures and occupying niches created by the emergence of federal standards. The Food Alliance, which enhanced their competitive position by exceeding the current standards, is one example of this strategy.

Finally, the certifying agencies face a decrease in their competitive advantage if the federal standards displaced the need for their existing standards. In this situation, the federal standards become a substitute for the certifying agency, effectively rendering their services irrelevant (Marshall & Standifird, 2005). An example of this can be found in the history of Oregon Tilth, Inc. (OTCO). Its competitiveness was compromised because the national standards displaced their unique position in the industry. In order to maintain their competitiveness, OTCO expanded their resource base beyond certification services to include educational activities.

2.4.4 Co-optation?

Ten years after the enactment of federal regulations, the question remains: Did the USDA co-opt the organic food movement? Constance (2010) argues that agribusiness firms were able to take advantage of the contested nature of the sustainability concept by framing sustainable agriculture in a manner that is beneficial to their business. Ingram and Ingram (2005) advanced another perspective. They argued that the organic movement strategically made concessions with the federal government in order to pursue their greater goal of a wider acceptance of organic practices. Taking both arguments into consideration, perhaps there is no clear answer at this point. Rather, the organic industry and its corresponding institutional field continues to evolve and the relevance of particular influences may ebb and flow depending on the context. In the next section, we will trace the evolving influences in the organic industry; paying particular attention to changes in the criteria for legitimacy judgments. In order to do so, we must weave the various theoretical perspectives regarding legitimacy into specific events in the history of the US organic food industry.

2.5 Sources of Legitimacy

Because legitimacy, by its very nature, relies upon consensus, its source transcends the boundaries of individual actors. Therefore, the question as to which is the most salient legitimacy assessment in a given institutional field is “always a question” in institutional studies (Johnson, Dowd & Ridgeway, 2006; Scott, 2001; p. 60; Suchman, 1995). Deephouse and Suchman (2008) echoed this sentiment, identifying the central question for legitimacy research as the ability to determine the actors who hold the authority of legitimation. Complicating this matter, organizations receive legitimacy judgments from both within the organization and from a broader audience outside the organization. Each stakeholder of the organization participates in assessing the legitimacy of the organization. While knowledge levels and influence varies, these stakeholders construct a “generalized perception” of the organization’s legitimacy. This perception may be viewed objectively by the organization, but its construction relies upon a subjective process (Reuf & Scott, 1998).

Various sources of legitimacy have been identified in the literature. They include external sources such as funding agencies, professional associations, unions, public opinion, and the media (Deephouse & Suchman; 2008). Legitimizing sources can appear within the organization as well, and include actors such as employees, board members, and managers (for a complete list, see Reuf & Scott, 1998). Jepperson (1991), citing the example organized crime, highlighted the importance of audience in identifying the legitimating source; asserting that a practice or object can be legitimate within a particular population, while not necessarily being accepted by broader society. Reuf and Meyer (1998) also cite the possibility of an organization that is judged to be legitimate upon one set of standards but illegitimate upon another.

Another issue adding to the complexity of this process is that identification of the legitimating source is largely dependent upon the researcher's focus. To illustrate this point, Deephouse and Suchman (2008) refer to two studies. The first, Suddaby and Greenwood's (2005) analysis of competing legitimacies in the legal and accounting professions, had a specialized and narrow focus which facilitated identifying the sources of legitimacy. The second study, however, shows the difficulties researchers face when dealing when adopting a broader perspective. In their analysis of the legitimacy of the global energy industry after the Exxon Valdez spill, Adler and Hass (1992) had to consider a wide range of sources including, but not limited to, government regulators, environmental activists, and industry analysts.

In their analysis of local governments' problems of legitimacy, Meyer and Scott (1983) provide insight into identifying potential sources of legitimacy. They identify two groups with the ability to threaten the legitimacy of an organization. One group is the actors that have sovereignty over the organization; whose mandate originates in the legitimating accounts of the organization. The second group are those actors that construct the appropriateness of the foundational elements of the organization. In other words, those actors that determine the degree of congruence between the organization's actions and culturally-acceptable practices (Meyer & Scott, 1983).

In an attempt to identify legitimacy sources in these broader contexts, some researchers have tended to consider the "society-at-large" as a potential source for legitimacy. This approach is common in studies of diffusion (c.f. Rogers, 1995) as well as population ecology (c.f. Carroll & Hannan, 1992; Hannan & Carroll, 1995). Other sources of legitimacy that have been employed in previous research include media accounts and the support of peer organizations (Deephouse & Suchman, 2008). Problems also arise in identifying legitimacy

sources when the institutional field experiences significant shifts or when different legitimating criteria conflict (Scott, 2001).

Federal mandates represent a situation in which, almost inevitably, a conflict in legitimating criteria arises. The growing strength of corporations in the recent past has compromised the autonomy of the state regulators, thereby decreasing the government's coercive power (Cawson, 1985). This has resulted in a struggle between regulators and corporations, as the government often does not yield enough power, nor has the specialized knowledge required, to coerce corporations into compliance. Therefore, the corporate/government relationship is characterized by a power dependency, with both parties exercising some autonomy, but not enough not to be constrained by the other (Cawson, 1985). This power dependency relationship creates an unstable and dynamic situation in which legitimacy judgments continuously shift.

The power dependency relationship between corporations and the government is similar to Meyer and Scott's (1983) "mixed system" that occurs when political exchanges become institutionalized within a political system. Mixed systems tend to incorporate a wide range of interests into an institutional field that is neither completely centralized nor decentralized (Meyer & Scott, 1983). In these situations, legitimacy problems are likely to occur because different legitimacy criteria will be relevant at various points in time. Legitimacy conflicts can arise over a host of issues; those identified by Meyer and Scott (1983) that are germane to our discussion include goals, technologies and material resources. Moreover, social changes, such as those that brought about federal organic legislation, often "maximize legitimacy problems," as they are structured to oppose other legitimacy sources (Meyer & Scott, 1983).

Within the context of the organic food industry, the ability to identify legitimacy sources is no less complicated. As we have presented, the tension in the organic industry may be

portrayed as a struggle between advocates of sustainable agriculture practices and proponents of the federal organic designation. To our knowledge, only one previous study has explored the issue of legitimacy within the context of the organic food industry. Rather than claiming organic agriculture had completely succumbed to the pressures of conventionalization, Ingram and Ingram (2005) sought to analyze the tradeoffs made by the organic movement in order to achieve their goals, such as the wider acceptance of organic practices. Their study "examine[d] the policy process as it illuminates how social movements strategize and frame their arguments in order to achieve political victory and wider appeal and how this process influences the choice of policy tools and, ultimately, the makeup of the social movement itself" (Ingram & Ingram, 2005; p. 125). The authors illustrated the process in which the alternative agriculture movement took advantage of a small opportunity provided by the passage of the Organic Food Production Act of 1990. The debate surrounding the bill facilitated the movement's efforts to mobilize resources and generate support for organic food production. To illustrate this process, Ingram and Ingram (2005) traced the multi-pointed connections between the organic movement and parties responsible for policy formation. Furthermore, they recounted the particular field conditions that provided constraints and opportunities for the organic food movement.

As we have demonstrated earlier, there are some who argue that there is little to distinguish between organic and conventional foods. While the purpose of our study is not to determine the validity of such a claim, we assert that the very prevalence of this argument provides merit to our argument that the institutional field surrounding organic foods lacks a dominant legitimacy source. The public mobilization to oppose the acceptance of controversial ingredients such as genetically-modified organisms illustrates the "politics of meaning struggle" that characterizes the definition of organic within the United States. Moreover, groups opposing

USDA standards saw their struggle as part of a larger resistance to emerging hegemony in the industrial food network and attempted to link with international movements that supported their ideals (Goodman, 2000). This struggle over legitimacy can be examined on at least two levels. One consists of the local level, which pits opposing opinions on the production of organic food. However, because the opponents of federal standards often framed their resistance in broader terms, we can also consider these events at a second level which challenges the broader industrial food system.

2.5.1 Normative Legitimacy in the Organic Food Industry

As we have shown, some authors characterized the organic food industry prior to the implementation of federal mandates as an industry reliant upon non-market oversight and trust, characteristics that are generally an indication of a normative foundation of institutional pressure (Goodman, 2000). This is also consistent with symbolic systems in Scott's (2001) framework of institutional pillars. An institution resting on normative pillars tends to draw upon values and expectations as vehicles to disseminate ideas. In this section, we will summarize some of those values.

Early conceptions of organic farming had a broader perspective than conventional agriculture. With a desire to build ecological health and to revitalize communities organic farming stood in stark contrast to conventional agriculture's market-based approach and overriding concern for production levels and return on investment (Altieri, 1995; Francis, 2009). Moreover, early organic advocates considered organic production to be consistent with an ecological conscious, recognizing that agriculture is embedded in a larger system of global ecology (Kirshenmann, 2009).

However, the federal certification of organic production facilitated the shift in regulatory institutional pillars. With regulatory legitimacy, institutions rely upon symbolic systems comprised of rules and laws (Scott, 2001). This shift in organic food production is evidenced by the introduction of federal governance systems, prescribed routines, and standard operating procedures outlined by USDA regulations. Goodman (2000) recognized the trend toward regulation early on in the shift of organic food and coined the term “technocentric legitimation” to describe the new legitimacy criteria. For Goodman (2000), technocentric legitimacy was based on the credibility of scientific knowledge; a distinct departure from previous legitimacy criteria in this field.

For certain actors in the organic institutional field, federal certification represented a greater reliance on a reductionist approach to agriculture. The reductionist approach is utilitarian and technical; defining organic only as a list of allowable inputs and practices (Goodman, 2000). The technical definition also failed to address issues of sustainability and social justice, particularly the utilization of mono-cropping, migrant labor, and vertical integration (Guthman, 1998). Federal certification and the increasing prevalence of the reductionist approach “represent[ed] a politically significant shift in the legitimation of organic agriculture, threatening its foundations in public trust established by the transparency of its material and ethical relations with nature” (Goodman, 2000; p. 217).

Federal standards also provided the opportunity to substitute market governance and a reductionist approach to agriculture for non-market oversight, or in other words, trust. As demonstrated by the Gibbon (2008) study of the European Union organic standards, technical knowledge became more prevalent when regulations were established or revised. The trend

towards technocentric legitimation dismissed the development of trusting relationships based on shared ethical values between producer and consumer.

Saddled with the task of navigating between two opposing sources of legitimacy, some authors have drawn attention to the seemingly inherent contradiction of organic agriculture. It is often pursued by individuals with normative goals who must operate within a market system that relies upon the instrumental rationality of the reductionist approach (Goodman, 2000; Marshall & Standifird, 2005). Further contradictions emerged during debate over the USDA definition of organic, as some actors from the movement agreed to negotiate the technicalities of organic production while striving to maintain their philosophical ideals (Goodman, 2000).

In fact, one can argue that the federal organic program is itself inherently ironic. Once the federal government began its support of organic agriculture, it was essentially forced to adopt a position in which it simultaneously supported both conventional and organic agriculture (Ingram & Ingram, 2005). Moreover, as organic practices are further defined by federal standards, “they are increasingly threatened by the disintegration of the very principles upon which they depend” (DeLind 2000; p. 199). Early researchers feared the tension may cause the system to collapse, and while early predictions of the demise of the organic industry failed to develop, the organic food system may still face a crisis of de-legitimation (DeLind, 2000). The number of sovereign groups active in the institutional field and the degree to which their perspectives contradict one another are harbingers of legitimacy loss (Meyer and Scott, 1983). And as we have seen, the organic industry contains a number of sovereign groups with strongly conflicting perspectives.

2.5.2 Salience of Legitimacy Arguments

Jepperson's (1991) argument concerning the relativity of institutionalization can also be applied to the relevance of differing legitimating authorities over time. The relevancy of various legitimacy assessments do not remain constant over time, rather it depends upon context in which they occur (Dacin, 1997; Reuf & Scott, 1998). Research analyzing the passage of the European Union organic standards provides an illustration of the shifting salience of legitimacy criteria over time (Gibbons, 2008). Over the course of developing organic regulations in the EU, a distinct cycle of standards emerged. Gibbons (2008) described the phases of this cycle as elaboration, tightening, deviation, and a return to fundamentals. At each stage of the process, different types of expertise rose to prominence. Technical knowledge was predominant during phases of elaboration and tightening (regulatory cycles). Whereas, political knowledge became more relevant during phases that returned to fundamentals. During the latter, actors attempted to (re)establish credibility or consistency, and politically-adept actors gained prominence (Gibbon, 2008).

Although identifying the various sources of legitimacy in a given context is interesting, perhaps a more relevant question to ask is which assessment is the most salient to the organization? We suggest that an analysis of the actors' legitimating accounts may provide assistance in answering this question. Moreover, legitimating accounts may provide a mechanism to identify the dominance of various legitimacy sources in competition during institutional shifts.

2.6 Legitimizing Accounts

We define legitimating accounts as a discursive strategy that actors employ to create common meanings that sustain or challenge an institution (Creed, et al., 2006). Traditional usage of this concept in literature focused on efforts to create meanings and identities (see for example, Creed et al., 2006). However, we assert that legitimating accounts are also related to the organization's response as identified by Hoffman (2001), who considered them as indicative of the firm's capabilities and cultural frames.

Early studies of legitimating accounts considered them to be a direct reflection of prevalent social norms. For example, Strang and Meyer (1983) used the “diffusion perspective” to focus on isomorphism to the spread of identical structures or logics (DiMaggio & Powell, 1983; 1991). Meyer & Scott (1983) conception of legitimating accounts as “ready to wear” identities also reflect early theorists idea of legitimating accounts as a complete internalization of institutional forces.

Czarniawska and Joerges’ (1996) approached legitimating accounts as a translation, rather than a reflection, represented a significant departure from earlier studies on the topic (Creed, et al., 2006). In their view, legitimating accounts represented individual interpretations of “translocal” ideas that can be similar, but not necessarily identical, to one another and are spread by “idea merchants” to promote new ideas. This is a requirement of the “interpretation” phase of translation which provides substance to ideas. Interpretation requires a familiarity with the ideas, where the efficiency of the process is related to the extent to which the receiver identifies with the sender’s message (Czarniawska & Joerges, 1996).

Creed and associates (2002) recognized that legitimating accounts may have a mobilizing component. They argued that existing conceptualizations of legitimating accounts could not

account for the political aspect of diffusion; how some ideas are chosen over others. Previous studies also failed to account for the agency of institutional entrepreneurs. To remedy these limitations, Creed and his colleagues recommended a modified perspective that recognized legitimating accounts can at times create a connection between the speaker and the listener. Further, the authors suggest legitimating accounts serve to legitimate both the actor's presence as well as the inclusion of a particular audience.

We maintain these cultural logics and institutional settings can also provide clues into the sources of legitimation. Weber (1991), in his discussion of legitimate behavior, asserted that individuals tend to conform their behavior with those rules/norms they presume to be dominant in that context, regardless if the individual personally agrees with them. Meyer and Scott (1983) also mention that legitimating accounts reflect those actors who possess authority over the firm.

2.6.1 Using Legitimacy Accounts to Identify Sources of Legitimacy.

Because each of the legitimating sources may consider different criteria (Reuf & Scott, 1998), legitimating accounts may provide us with a means to trace the ebb and flow of salient legitimacy sources in the context of significant institutional change. Legitimating accounts may also provide insight into a number of issues identified by Reuf and Scott (1998), such as determining the elements of interest within institutions, identifying the sources and the relevant dimensions of legitimacy, and identifying the level of assessment whether it is the population, organization, or subunit, as well as their associated salience.

Past research identified the salience of legitimating arguments through a fields' survival rates (Reuf & Scott, 1998). While a dichotomous variable may be an effective strategy to capture the dominant salient source in a given context, we argue that a discursive approach to

this topic may provide a more nuanced perspective on the process, particularly during times of institutional shifts. We contend that such an approach is in line with Reuf and Scott's (1998) recommendation to carefully examine the varying sources of legitimacy in order to uncover the diversity inherent in the legitimation processes.

Discursive strategies have been used to provide insight into the “processes of legitimation by examining the concrete discursive practices and strategies used” (Vaara, et al. 2006, p. 793). They also have been found to reflect particular ideologies (Van Dijk, 1998). Previous research has also demonstrated that particular narratives are offered in different contexts in an effort to legitimize favorable practices (Brown, 1998). Legitimizing accounts represent one type of discursive strategy available to actors. In the next section, we recount previous studies that have adopted similar approaches and we will discuss how we will use the discursive strategy of rhetorical analysis to trace the development of these legitimating accounts.

2.7 Discourse Analysis

Broadly considered, our study employs discourse analysis to analyze legitimating accounts of actors in the institutional field. The term discourse refers to a collection of related texts, whereas discourse analysis is the study of those texts (Phillips & Hardy, 2002). In organizational studies, the term discourse analysis can refer to the study of the written or spoken word. The term is used as an umbrella term for communication and, as such has been employed in a wide array of manners over the years; oftentimes without explicit definition (Hartelius & Browning, 2008). In fact, by the late 1990's, use of the term had reached a point where some suggested it could mean virtually anything (Alvesson & Kärreman, 2000). To avoid the

ambiguity surrounding this term, our study specifically undertakes a rhetorical analysis; an approach which we will outline in the following paragraphs.

The entirety of a discourse rarely appears in a single text, therefore it is the job of the researcher to trace the discourse over the course of numerous, related texts (Phillips & Hardy, 2002). Texts are seen as the arena in which actors imbue objects with complex social meanings by drawing on specific past events and institutional knowledge (Kress, 1995; Phillips & Hardy, 2002). Specifically, we approach texts as a vehicle for organizational actors to pursue a goal, as well as a mechanism through which scholars can trace the dynamics of symbol use in human interaction (Conrad & Malphers, 2008; Heracleous & Barrett, 2008).

Although discourse analysis is particularly interested in the manner in which ideas are created and maintained, perhaps the most important contribution of discourse analysis is its ability to illustrate the manner in which language constructs reality (Berger & Luckman, 1967; Phillips & Hardy, 2002). Therefore, discourse analysts are concerned with the dynamics between the texts, the broader discourse, and the social context in order to understand not only the visible phenomena, but also how those activities link to a broader conception of reality in which those phenomena belong (Phillips & Hardy, 2002).

For our study, rhetorical analysis was determined to be the most appropriate form of discourse analysis for two reasons. One, unlike narrative accounts (Gollant & Sillince, 2007; Czarniawska, 1998) or organization accounts (Elsbach, 1994), rhetorical analysis permits the researcher to look beyond the text itself to the broader social context. The development of the USDA definition of the term “organic” is ultimately a political process and thus we deemed it necessary to consider the influence of the politics upon the construction of the legitimating

accounts. Rhetorical analysis is well-suited to this task. Second, actors in the organic certification process employed various texts to present their legitimating accounts. Rhetorical analysis can trace the commonalities in these texts over time. In the following section, we will briefly discuss the main tenets of rhetorical analysis.

2.7.1 Rhetorical Analysis, Organizations, and Institutionalization

Rhetorical analyses have been useful in the study of organizational legitimacy. Elsbach (1994) analyzed the manner in which representatives from the California cattle industry sought to influence public perception of the legitimacy of their companies during times of controversy. She found that companies were more likely to retain their legitimacy if they acknowledged, rather than denied, the controversy. Moreover, she found appeals to institutional elements - normatively endorsed practices such as TQM - tended to be more effective than evocations of technical merits. Finally, the effectiveness of the representatives' arguments depended upon the audience's level of expertise, as well as their initial opinion of the controversy.

In their analysis of various discursive legitimating practices, Van Leeuwen and Wodak (1999) identified four themes employed by Austrian immigration agents to justify their decisions regarding the citizen status of family members of legal immigrants. These included authorization, rationalization, moral evaluation, and mythopoesis. Authorization tactics consisted of appeals to the actors which have authority over the speaker. Rationalization tactics evoked themes of utility and pragmatism; whereas, moral evaluation strategies employed references to a particular value system. Finally, mythopoesis referred to the process of conveying legitimation accounts through stories (Van Leeuwen & Wodak, 1999). Finally, Creed's (2006) study of

workplace discrimination against gays and bisexuals illustrated how actors link legitimating accounts to higher order cultural accounts.

A number of researchers have examined rhetoric in the context of changing institutional fields. One common element of these studies is that they argue that rhetoric is not only a reflection of the values and thoughts of the actors, but also influences the trajectory in which the fields evolve. One of the hallmark studies concerning this topic is Barley and Kunda's (1992) examination of American managerial rhetoric from 1870 to 1990. Using the pendulum theory from economics as well as the concept of long waves, they demonstrated that, rather than a steady progression towards rationality, managers' rhetoric had alternated between normative and rational over time. Moreover, the particular phase in the wave oftentimes determined the dominant rhetoric. For example, in times of great innovation managers tended to deploy rational rhetoric, however as the initial surge diminished, normative rhetoric tended to rise to the fore.

Barley and Kunda (1992) traced the ebb and flow of five managerial ideologies; were industrial betterment (1870-1900); scientific management (1900-1923); welfare capitalism / human resources (1923-1955); systems rationalism (1955-1980); and organizational culture (1980-1990). They categorized the first two ideologies as rational control; while the latter three drew from the normative control paradigm. Interestingly, Barley and Kunda found the different rhetorics never completely disappeared, leading them to suggest that each type of rhetoric was eventually institutionalized. Similar to their study, our research attempts to identify the underlying logic of the rhetoric surrounding organic certification and to explain its dynamics.

Abrahamson (1997) extended the work of Barley and Kunda by statistically comparing the pendulum theory and the performance gap theory. The performance gap theory, included in

the original study but subsequently dismissed by Barley and Kunda, states that managers tend to use the rhetorics that can help them address differences between desired and actual performance levels. When changes in the environment reduce this difference, interest in those rhetorics recedes. Abrahamson's study statistically tested the two theories and attempted to explain the persistence and re-emergence of rhetorics in later periods. Abrahamson concluded that the data required a more complex explanation than originally provided by Barley and Kunda (1992). Shifts in rhetoric are not just influenced by changes in the environment; rather Abrahamson argued that rhetoric may also influence shifts in the environment. Moreover, Abrahamson demonstrated how the pendulum theory could adequately account for the emergence of new rhetorics; however the performance-gap theory provided insights into the re-emergence and persistence of other rhetorics.

Another example of research analyzing rhetoric during institutional shifts was Green and colleagues (2009) study of the rhetoric surrounding the struggle between investors and managers over corporate control. Their research represents one of the few studies that consider the way that institutional entrepreneurs (DiMaggio, 1988) deploy rhetoric to actively shape the institutional field. Green et al. (2009) demonstrated that changes in rhetoric surrounding corporate control corresponded with actual changes in the authority within the firm.

2.7.2 Enthymemes in Rhetorical Analysis

One feature of rhetorical analysis is its ability to uncover the implicit elements of an argument. Rhetoricians coined the term enthymeme to describe an argument in which a major

premise is absent (Green, et al., 2009).¹¹ The second characteristic of an enthymeme is that the conclusion does not necessarily need to be logical (Feldman & Skölberg, 2002). Enthymemes create a collaborative opportunity for the rhetor and the audience to arrive at judgments regarding the plausibility of the argument. Since enthymemes are not required to be universally true, their premise can be contested, however since it is traditionally omitted, it is often difficult to do so (Green et al., 2009).

The actor uses the enthymeme to identify with a particular audience without explicitly stating all the assumptions inherent in their argument. When actors employ an enthymeme, they seek to draw in and persuade their intended audience through an appeal to the audience's particular attitudes and beliefs. Enthymemes prove to be a powerful persuasion tactic, as they call upon the existing beliefs of the audience (Green, et al., 2009). To our knowledge, two studies have used enthymeme analysis in an organizational context, Feldman and Skölberg's (2002) analysis of change in the administration of two cities and Green et al.'s (2009) study of the evolution of rhetoric surrounding TQM in American management.

Following the argument set forth by Aristotle, Feldman and Skölberg (2002) assert the enthymeme contains fewer components than traditional arguments because the familiar components are provided by the audience. Feldman and Skölberg (2002) demonstrated how the identification of the enthymeme in a story enabled the researchers to bring to light the implicit meanings of the rhetor and contest the major premise of the argument. For example, the authors deconstruct a story regarding the policies of the previous administration. Implicit in the story

¹¹ Rhetoricians acknowledge enthymemes may lack other components, such as the minor premise or the conclusion.

was the premise that formalized rules and procedures impede customer service. Once this premise is surfaced, the argument can be critiqued more easily.

Green followed his previous analysis of corporate control rhetoric with a study of the changes in the argument structure surrounding TQM implementation (Green, Li, & Nohria, 2009). In this study, the authors use rhetorical theory to demonstrate the institutionalization of TQM in American corporations. Specifically, they demonstrated that as material activity gains legitimacy, the symbolic activity supporting it becomes increasingly simple. They explain this process by arguing that the taken-for-granted nature of the material activity no longer requires justification.

2.8 Expected Findings

In our study, we omitted the final category identified by Van Leeuwen and Wodak (1998) based on the findings of Vaara and associates (2006) that mythopoeic strategies are generally the vehicle for the other types of legitimacy and thus do not constitute a distinct category of rhetoric. Thus, our study will analyze the grammars of legitimation dedicated to utility, morality, and appeals to authority. The first two themes integrate into Suchman's (1995) legitimation strategies of pragmatic and moral legitimacy. In the context of our study, we feel that the final theme, authorization, will consist of either moral or pragmatic appeals and will depend upon the perceived salience of these legitimacy arguments. This approach is also consistent with the three rhetorical strategies (pathos, logos, and ethos) first proposed by Aristotle, and later identified by Green and associates (2009), as important elements of the rhetoric associated with shifting institutional fields. Pathos refers to arguments that contain an emotional appeal, whereas logos

contain logical appeals. Finally, rhetorical ethos evokes the credibility of the speaker or tradition (Green, et al. 2009; Green, 2004; Nohria & Harrington, 1994). Green and associates (2009) demonstrated that pathos and logos reflected an effort to establish pragmatic legitimacy and generally appeal to the audience's self-interest. Ethos, on the other hand, is associated with moral legitimacy as it generally addresses normative approval. Therefore we feel these grammars hold the potential to identify legitimation sources when actors in the organic food industry engage in authorization tactics.

Like Barley and Kunda (1992), we expect culture and ideology to bind the characteristics of the rhetoric, but the external economic and regulative forces to account for the shifts in the content of the rhetoric. Thus the shifts in the legitimating accounts can provide insight into the dominant group at a given time. Like their study, we expect to witness elements of the groups' rhetoric to become institutionalized over time.

We consider the word legitimating accounts to be a product of a rhetorical process in which actors struggle to imbue an object with a particular meaning that reflects their interests (Conrad & Haynes, 2001). This struggle was part of the political process that determined the definition for the USDA's organic food designation. We expect the rhetoric surrounding organic certification to shift – particularly the strategies actors use to present their legitimacy - as a different influences rise and fall, as the federally-mandated definition is created, introduced, revised, and enforced.

We also expect to witness the same resonant themes found in the studies of Barley and Kunda (1992) and Abrahamson (1997). The rhetoric associated with rational control emphasized mechanical systems which could be reduced to component parts and reassembled into a more-

efficient whole (Barley & Kunda, 1992). In other words, this perspective asserts that processes can be analyzed in order to reach optimal productivity (Abrahamson, 1997). This perspective dovetails with the reductionist perspective, as well as the rhetorical strategy of *logos*.

Conversely, Barley and Kunda (1992) found the rhetoric surrounding normative control tended to emphasize a sense of community and shared values. These themes approximate those that we expect to find from the movement farmers in our study.

The rational and normative perspectives contain incommensurable root metaphors. The rational perspective deploys a mechanistic, non-human metaphor, whereas the normative perspective subscribes to the ideas of humanity, culture, and community (Abrahamson, 1997). Therefore, we suspected inconsistencies or shifts in the legitimating accounts in our study would provide clues into the sources of legitimacy over time. We argue that the legitimacy accounts in our study can be seen as a type of enthymeme and that the missing premise contained in them can identify those dominant parties (the legitimating sources) to which the actors are tailoring their arguments.

Furthermore, we expect this dynamic to be especially evident in actors who are not heavily invested in one side or the other. In other words, we expect the “middle path” actors, those who are not particularly wedded to either ideology, to strategically deploy legitimating accounts to gain favorable judgments from the dominant sovereign group at the time. We expected to find instances of rhetoric as a vehicle for manipulation as well as a stylistic resource in our study. Those actors with significant resources committed to a particular agricultural method are more likely to engage in the persuasive element of rhetoric. Likewise, those actors that have more flexibility or less commitment, may employ the more decoupled rhetorical strategy, as they attempt to align their legitimating accounts with the most salient authority.

CHAPTER 3

METHODOLOGY

“The limits of my language mean the limits of my world.” - Wittgenstein

Theoretically, when positioned along a continuum of approaches that is bracketed by positivism on one end, and post-modernism on the other, our research falls between “quasi-positivistic” and “interpretivist” (Taylor & Trujillo, 2001). A quasi-positivistic approach requires research to adhere to pre-established protocols in an effort to establish reliable and generalizable findings and test existing theories. On the other hand, an interpretivist technique utilizes an inductive approach to the data, employs exemplar examples to uncover common patterns and considers validity to be a function of providing sufficient evidence from the data of the researcher’s claims. Furthermore, interpretivist accounts demonstrate evidence of an iterative and reflexive evolution of the researcher’s approach to the data and explanations (Taylor & Trujillo, 2001). The goal of the interpretivistic approach is to develop theory without the need for reductionism that is a requirement of a positivistic approach.

3.1 Description of Data Set

Our study draws from the following four data sources;

- the 1990 Joint Hearing of Congress regarding the proposed organic certification program,

- letters written by concerned citizens and groups to the United States Department of Agriculture between 1997 and 1998 in response to the release of a draft of the certification criteria,
- samples of the National Organic Standards Board minutes from 2001 to 2011,
- transcripts from a 2011 listening session hosted by the National Organic Program.

These sources were chosen because they incorporate primary sites of “official” policy rhetoric.

The sources of our data, like Hoffman’s (2001) law cases, represent a number of formal systems in which actors continuously influenced and responded to one another, such as the NOSB meetings. Although this approach does not completely capture the dynamics of the organizational field, it has the potential to trace fundamental shifts in the field and can draw attention to the less visible field constituents. Furthermore, the various texts surrounding the USDA designation allow researchers to observe the manner in which the organizational actors deploy rhetoric. Adopting a longitudinal approach, we can further observe how the rhetoric within, and between, organizations change.

Moreover, we consider this data to constitute a theoretical sample of the overall discourse on federal organic standards as it is “particularly suitable for illuminating and extending relationships and logic among constructs” (Eisenhardt & Graebner, 2007, p. 27; Yin, 2003). We contend that there are at least four reasons to see our data as a theoretical sample. First, the timeframe of the sample contains the formation, launch, and modification of the United States Department of Agriculture’s legal definition of organic products. Thus, the sample contains the entire time period in which organic standards were developed. Second, the transcripts contain illustrative instances in which different actors argue that their particular agriculture practices are

legitimate. Third, much like Khaire and Wadhvani's (2010) auction house literature on contemporary Indian art, our sample contains explicit discussion regarding the meaning of a central term. Finally, the activities comprising organic certification provide a clear example of a discursive struggle. As each actor attempted to pursue standards that represented their best interests, the landscape shifted in regards to the various conceptions of the meaning of organic (Ingram & Ingram, 2005; Phillips & Hardy, 2002).

The type of rhetorical analysis we performed requires a familiarity with the historical context of the phenomena of interest. Going into the study, we had some understanding of the organic industry, as the lead author worked in the industry for several years. However, to further our knowledge, we engaged in an extensive review of the existing research surrounding the United States Department of Agriculture's determination of organic standards. In the following paragraphs, we recount some of the more specific events surrounding the production of the texts we will analyze.

The first document is the transcript from the Joint Hearing before the House Committee on Agriculture, June, 19, 1990. To our knowledge, this meeting was the first held to review the proposed organic certification program and included the Subcommittee on Domestic Marketing, Consumer Relations, and Nutrition; and the Subcommittee on Department Operations, Research, and Foreign Agriculture. The document contains 262 pages of text, representing prepared statements by various House Representatives, as well as submitted material from other interested parties, such as individuals from the Organic Crop Improvement Association, the Organic Food Alliance, the Iowa Organic Growers and Buyers Association, as well as others. Appendix B contains a complete list of the attendees for this event.

The second source of material comes from letters submitted to the National Organic Program (NOP) in response to the release of the proposed organic standards in 1997. At this time, the USDA published the proposed organic certification standards in the Federal Register (62 FR 65850) which specified the inclusion of genetically-modified organisms, the use of sewer sludge fertilizer, and irradiation. Once the proposed rules were published, the USDA solicited public responses on their website. During the next year almost 250,000 comments were posted to the website (Ingram & Ingram, 2005). Unfortunately, all the comments were not made available to the public; however the National Organic Program did select numerous representative letters to post on their website during this time. It is these representative letters that we use for our data for this period. These can be found in Appendix D.

The third source of material consists of the National Organic Standards Board (NOSB) meeting transcripts taken from 2001 to 2011. The NOSB serves as an advisory group to the Secretary of the United States Department of Agriculture (USDA) and is composed of fifteen members consisting of farmers, environmentalists, consumer and/or public interest groups, handlers and/or processors, a retailer, a scientist specializing in toxicology, ecology, biochemistry, and a certifying agent. The Secretary of the USDA appoints volunteer applicants to five year terms. Appendix C provides a list of current and former board members. The time period of analysis also contains a change in the NOSB's mission. Prior to the passage of organic standards, the NOSB's primary goal was to establish a set of criteria that would specify the organic standards. However, once the USDA passed the Final Rule in December of 2000, the NOSB's function shifted to primarily an advisory board, providing recommendations regarding the acceptance of permissible inputs (Marshall & Standifird, 2005).

The final source of data comes from transcripts of a public listening session hosted by the USDA on September 20th, 2011 in Washington, DC. The purpose of the meeting was to solicit public response to the USDA's activities supporting organic agriculture. Specifically, the USDA sought comments on the actions of the NOP that did not concern the NOSB, as well as comments on other agencies and governmental groups working on organic agriculture issues. The meeting was free and open to the public and all attendees were able to speak. The USDA also allowed the submission of written comments by email. Participants are listed in Table XX and the manuscript consisted of 269 pages.

3.2 Operationalization of variables

3.2.1 Word Lists

In order to capture the greatest number of terms for each type of legitimating accounts, we employed both a deductive and an inductive approach to the construction of our word lists. Since we are concerned with legitimating accounts, we only considered rhetoric that is self-referential. Although actors may invoke various types of legitimacy in other contexts, we are not concerned with these actions unless they reveal insights into the manner in which the actors perceive their own legitimacy.

To construct our deductive word list, we drew from Suddaby and Greenwood's (2005) exploration of the rhetoric used to support and contest significant changes in the accounting industry. We also considered phrases associated with pathos and logos as identified by Barley and Kunda (1992) as well as Abrahamson (1997). Therefore we expect legitimating accounts to draw upon a pragmatic foundation to invoke themes of economic benefits and/or making choices

that benefit the common good. Other expected themes included appeals to consumer protection against fraud, claims for a decreased cost of production, and appeals to the facilitation of trade. Our initial word list will include the phrases found in Table 1.

We employed Suddaby and Greenwood's (2005) study to develop our deductive word list for moral legitimacy as well. In their study, they found that opponents of the proposed changes to the accounting industry relied upon arguments that invoked traditional values and highlighted the moral and normative conflicts potentially arising from the proposed changes. We, too, expected common refrains of opponents to include appeals to tradition, values, and ethics and expected arguments for community benefits and soil health to be prevalent. Once we established both deductive word lists, we used the Oxford Thesaurus to further populate our word lists.

The second approach to populate our word lists was inductive, so that we may uncover words that may have been overlooked by the deductive method (Short et al., 2010). A similar strategy was employed by Doucet and Jehn (1997), Kabanoff, Waldersee, and Cohen (1995) and Kenneth Burke (e.g. 1941). Conrad and Haynes (2001) summarized Burke's approach and suggested that once the key constructs have been identified, the researcher must iteratively re-examine the texts to uncover constructs that were not readily apparent in the initial analysis. The goal of this process is to summarize the core principles in the texts. Through the use of both approaches we likely to uncovered the majority of terms used by the actors to construct their legitimating accounts.

3.2.2 Affiliation of Participants

The second measure in our study tracked the participation of affiliates over the timeframe of the study (1990–2011). To do this, we coded the participants along three dimensions: affiliation to the NOSB, organizational type, and the position the individual holds in the organization. An individual's affiliation with the NOSB will consist of four levels: individuals with no affiliation received a zero, current members of the NOSB received a one, past members a two, and future members a three, when applicable. The second actor code, organization type, contained six groups; the organic movement, corporate organic entities, conventional food firms, consumer groups, governmental representatives, and certifying agents. These categories were coded one through six. The third dimension was the position held by the individual in the organization. Executives were assigned a one, non-executive employees were assigned a two, lobbyists or other individuals representing the firm received a three. For those individuals whose relationship to the organization was unknown, we assigned a zero.

3.3 Data Analysis

We employed both qualitative and quantitative approaches to analyze the data. The ability to utilize both types of analysis is one of the advantages to discourse analysis and has been used by researchers such as Green, Li, and Nohria (2009) and Prasad (2002). Furthermore, like Taylor and Trujillo (2001), we maintain that the different methodologies can uncover distinct dimensions of the organization.

3.3.1 Qualitative Analysis

We began our analysis by performing a content analysis of the texts using the software NVivo 9.0 to extract phrases and terms that indicate the various legitimating accounts. Following Krippendorff (1980), we considered each event to comprise a single recording unit. Thus, both the House proceedings, the letters received during the comment period, and the listening session were considered individual units. Additionally, each NOSB meeting was considered a single unit. In order to assure that each source is represented equally in the data, we weighted each unit. For example, if there are 28 separate NOSB meetings, a single meeting will comprise 0.893% of the overall dataset.¹² Once we analyzed each recording unit and populated our inductive word list, we focused on assessing patterns in the data.

To uncover these patterns we alternated focus between the rhetoric (particularly legitimating accounts) and an increasingly broader social context. The particular levels are driven by our research questions and the unit of analyses corresponds with the level under consideration (Prasad, 2002). We employed an iterative, intertextual analysis that draws from the hermeneutic circle, which was recommended by Prasad (2002) and employed by Khaire and Wadhvani (2010). Using this approach pushed the context of the study to the fore and demonstrated the often-times implicit boundaries drawn by researchers around the phenomena of interest. This approach also provided a more holistic understanding by defining the context and text at different levels of comprehensiveness; as the levels became broader, the level of comprehensiveness increased (Prasad, 2002).

¹² Similar to the approach used by Abrahamson (1997) this figure is calculated by dividing the weight of the source relative to the overall dataset (1/4) by the total number of units of that source (in this example, 1/28).

In the first iteration, the researchers focused on the rhetoric as it related to inter-organizational legitimacy and will employ the individual actor level of analysis. Here we looked for rhetoric that connects the legitimating accounts of the actors to other actors' accounts. Particular emphasis was given to arguments that compare and contrast one organization with another.

The second iteration adopted a broader unit of analysis; the market level (Heracleous & Barrett, 2001). In each of the subsequent levels of analysis, data collection occurred at the individual level, but we used this data to infer the presence of particular phenomena at higher levels of analysis (Heracleous & Barrett, 2001). At the market level, we were interested in the changes in the legitimating accounts and the food production system in the United States. As we have shown in Chapter 2, organic food production continues to be practiced by a minority of farmers in the United States, despite the recent surge. For example, we searched for rhetoric related to organic food's role in the "feeding America," the rise of corporate organic operations, and the application of industrial production techniques to agriculture.

The third iteration centered on the actors' legitimating accounts in relation to the broader economic system. Examples of this type of rhetoric included questioning the application of capitalistic economic models to food production systems. Finally, the last iteration examined these legitimating accounts juxtaposed with the predominant Western knowledge system. Here the researchers looked for evidence of support of, or challenges to, positivism and the scientific method of inquiry. We expected this analysis to yield common themes across the various contexts.

A similar approach can be found in some other examples of rhetorical analysis. Alvesson and Kärreman (2000b) identify four versions (or levels). They are, listed from specific to universal; micro, meso, Grand, and Mega. The more specific, or local, levels such as micro and meso, correspond to the analysis of the changes in the individual rhetorics and the interaction of the different actors' rhetorics. At the micro level, researchers are looking at the complexities of social interaction and local variation. A meso level approach is also concerned with rhetoric in specific contexts, but attempts to uncover patterns in similar contexts (Alvesson & Kärreman, 2000b). The broader levels, referred to as Grand- and Mega- discourses in Alvesson and Kärreman look beyond local variations to recognize "over-arching themes in specific situations" (2000; p. 1134). These differing foci do not preclude analysis of other levels; rather it is a matter of emphasis. In our study, we were concerned with the micro processes of rhetoric; however, we also attempted to link these to a broader social context.

3.3.2 Quantitative Analysis

Once the rhetorical analysis is complete, we planned to perform post hoc quantitative analyses to assess the trends in the data. First, we will use SPSS 17 to create scatterplots for each actor and legitimating account over time. Time will be plotted on the x axis with a positive comment ratio on the y axis (ranging from 0 to 1 and calculated by dividing number of positive and neutral statements regarding the particular legitimacy divided by the total number of statements). Results from this test should give an indication if further analysis may be warranted. If so, we will run a repeated measures 2-way ANOVA in SPSS 17. Our first test will seek to uncover the difference between organic movement and conventional food firms to

determine if there is any significance difference in the types of legitimating accounts each side is employing. Based on these results, additional groups may be compared.

3.3.3 Determining validities

Because the current study employed both quantitative and qualitative analyses, we took two different approaches to assess the validity of this research. For the quantitative measures, we calculated reliability, reproducibility, discriminant, and external validities. For a measure of reliability, we followed the calculations for stability as suggested by Krippendorff (1980). Stability refers to the degree to which the analysis remains constant over time. We used the test/retest method to measure this in that we will choose recording units from the holdout sample that most closely match the dates of the analyzed recording units. We then assessed the similarity of the results using Cohen's Kappa coefficient (Krippendorff, 1980). Cohen's kappa was calculated by subtracting the chance agreement percentage by the actual percentage and then dividing by one minus the chance agreement percentage. Recording units that exhibit kappa values greater or equal to .90 were considered stable.

The next validity measure was the reproducibility of the findings; the ability to recreate similar findings under changing conditions (Krippendorff, 1980). We utilized a test/test design in which two researchers use the same instrument on a sample from the analyzed data (Schnurr et al., 1986). Findings from recording units equal to or greater than, .90 were retained.

Next we assessed the discriminant, or single category, validity of our findings; the extent to which a phrase appears only in a single category. We used NVivo 9.0 to calculate the discriminant analysis of the various categories. However we also visually inspected the

correlation matrix, looking for phrases exhibiting strong correlations with phrases outside of their category (Short et al., 2010). If the data appeared to contain a high degree of cross-loadings, we would perform an exploratory factor analysis (EFA) using SPSS 17. If the EFA reveals poor loadings, we would consider reexamining the categories. Finally, external validity was achieved through the analysis of three different texts produced in different contexts for different audiences.

The validity criteria for qualitative analyses draw from a different conceptual base than quantitative analyses. At the front end of the linguistic turn, scholars rarely specified the criterion upon which their research could be evaluated (Tompkins, 1994). Since that time, a number of researchers have set out to establish methodological rigor for the qualitative analysis of discourse (cf. Krippendorff, 1980; Tompkins, 1994). For example, Tompkins (1994) establishes baseline measures for qualitative analysis. The first characteristic, representativeness, refers to the extent the text selected for analysis accurately reflects the broader population from which it was drawn. The second characteristic, consistency, refers to the ability of a third party to verify the researcher is accurately representing the text. The goal for most qualitative research is to further develop existing theories (or construct new ones) through the use of exemplars to denote common patterns. In order for qualitative and inductive research to be considered valid, it must accurately portray the “consensual and contested meanings” offered within the discourse among the various actors and adequately provide the historical and cultural contexts. Inductive research must demonstrate evidence of researcher reflexivity; showing that the researcher alternated between the findings and the data to revise initial categories (Taylor & Trujillo, 2001).

CHAPTER 4

DATA ANALYSIS

4.1 Construction of Word Lists and the Legitimizing Accounts Typology

We began the analysis by assembling a word list to identify the various legitimating accounts summarized in Chapter 3. We based the list on previous studies that analyzed the language of legitimacy. We focused on the works of Abrahamson (1997) and Barley and Kunda (1992), as both of these studies specifically examine the dynamics of the different legitimacy types over time. Furthermore, because Abrahamson (1997) serves as a response to Barley and Kunda (1992), there is a degree of continuity with these word lists that would not be gained if we drew from unrelated studies. This deductive list provided initial insight into the way actors presented their legitimating accounts in our study. Moreover, we used this list to build a preliminary categorization of the legitimating accounts, differentiating between pathos (moral) and logos (pragmatic).

Table 1

Deductive Word List

Word	Type of legitimacy	Source
beliefs	pathos	Barley & Kunda 1992
flexibility	pathos	Barley & Kunda 1992
pathos	pathos	Barley & Kunda 1992
principles	pathos	Barley & Kunda 1992
quality	pathos	Barley & Kunda 1992
values	pathos	Barley & Kunda 1992
economic	logos	Barley & Kunda 1992
efficiency	logos	Barley & Kunda 1992
optimize	logos	Abrahamson 1997
practical	logos	Barley & Kunda 1992
productivity	logos	Abrahamson 1997
rational	logos	Barley & Kunda 1992
rationalism	logos	Barley & Kunda 1992
reasoning	logos	Barley & Kunda 1992
scientific	logos	Barley & Kunda 1992
evidence		

As we analyzed the text, additional words and themes emerged. As expected, these included additional words that represented the pragmatic and moral legitimating accounts. Table 2 contains the words we identified during our inductive analysis. In addition to the pragmatic and moral legitimating accounts, legitimating accounts drawing upon ethos also surfaced. Specifically, we considered ethos legitimating accounts to contain references to other organizations or entities and assurances of an actor’s knowledge, effort expended on a task, or inclusion of public input. Figure 2 provides the totals for these three types of legitimating accounts.

Table 2

Inductive Word List

Word	Type of legitimacy	Word	Type of legitimacy
dissemination	information	sustainability	pathos
information	information	synthetic	pathos
biodiversity	pathos	tradition	pathos
bio-dynamic	pathos	traditional values	pathos
community	pathos	traditions	pathos
ecological	pathos	values	pathos
emotion	pathos	wholesome	pathos
environmental	pathos	balance	logos
environmental stewardship	pathos	burdensome	logos
ethics	pathos	commodity	logos
family	pathos	complexity	logos
farmer	pathos	confusion	logos
farmer focus	pathos	consistent standard	logos
grassroots	pathos	consumer	logos
grower	pathos	control	logos
history	pathos	cost	logos
integrity	pathos	economic benefits	logos
inter-relatedness	pathos	feasible	logos
long term viability	pathos	fraud protection	logos
pathosity	pathos	internal control systems	logos
pathoss	pathos	maximize	logos
natural	pathos	production costs	logos
norms	pathos	profit	logos
oldest	pathos	regulatory	logos
principles	pathos	safety	logos
responsible	pathos	technology	logos
soil fertility	pathos	trade	logos
soil health	pathos	trade facilitation	logos
standard of living	pathos	unwieldy	logos

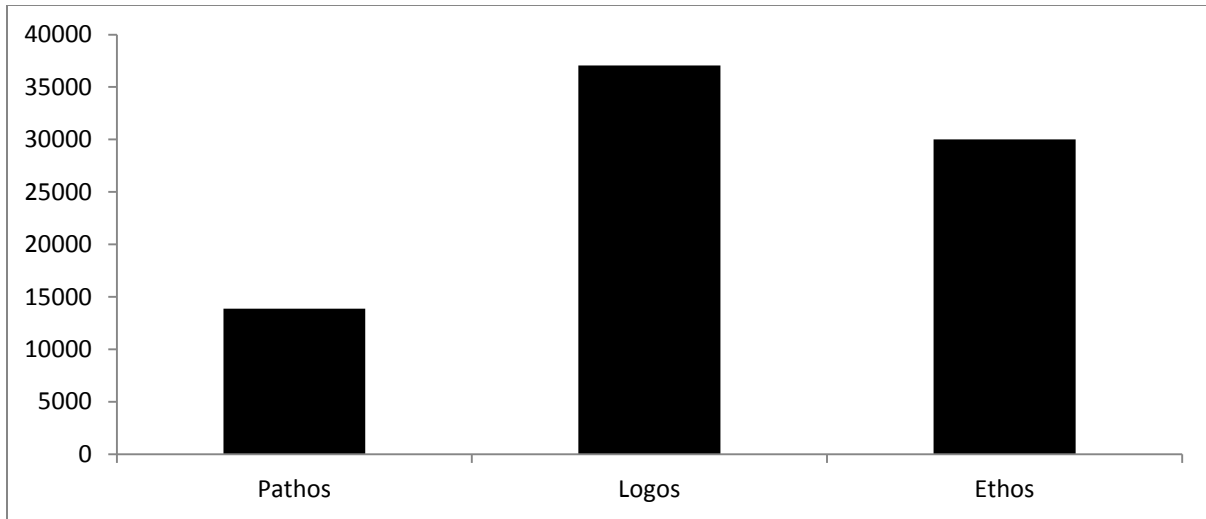


Figure 2. Total Legitimizing Accounts by Type (by Word Count)

We also further identified arguments within the pathos, ethos, logos typology that were specific to the organic food institutional field. These totals can be seen in Figure 3.

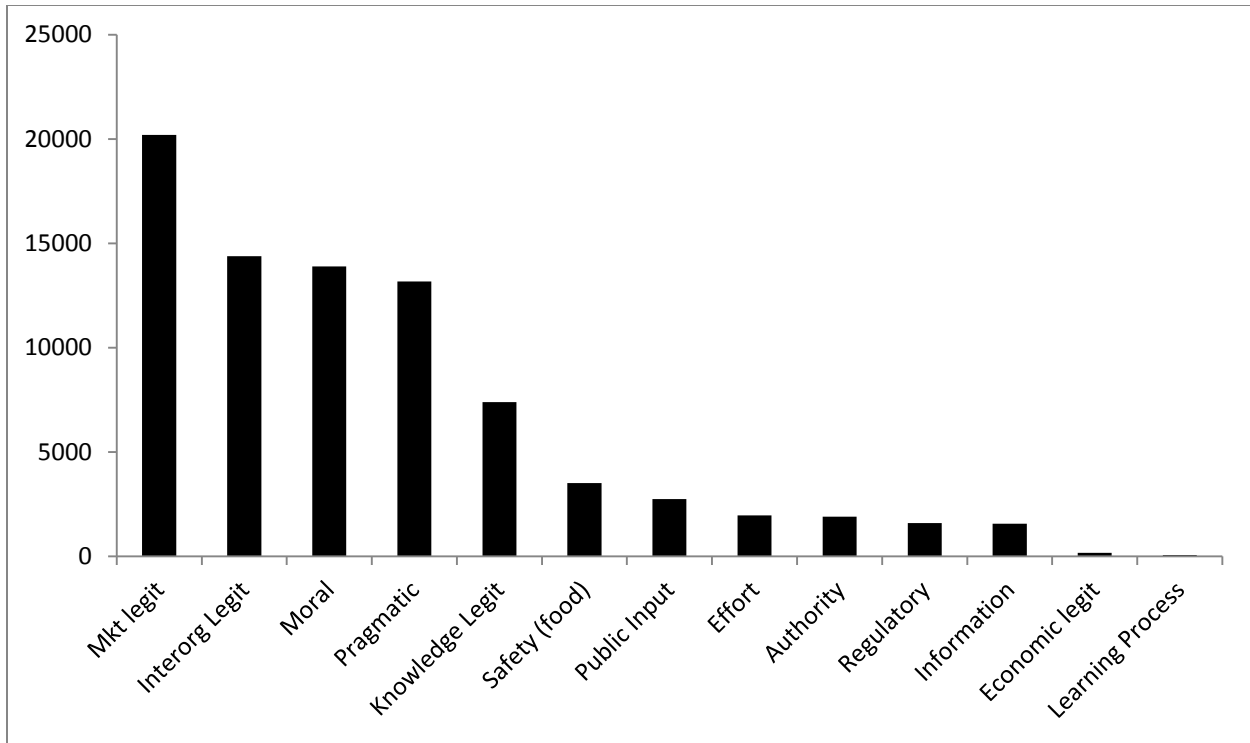


Figure 3. Total Legitimizing Accounts by Specific Type: Main Sample (by Word Count)

We considered the other types of legitimating accounts distinct from either moral or pragmatic legitimacy accounts as they did not directly address economic benefits (pragmatic) nor drew upon traditional values (moral). We will further discuss these legitimating accounts later in the chapter.

4.2 Quantitative Analysis

Once the word lists were completed and the various legitimating accounts identified, we turned to the quantitative analysis of the texts. Our analysis moved from the most general trends

in the data to greater degrees of specificity. Overall, we identified 2177 actor dates and 82,581 words of legitimating accounts. Descriptive statistics of the main dataset are listed in Table 3.

Table 3

Descriptive Statistics of the Sources

	Total	Main Sample	Holdout	Adjusted Weight
NOSB	481779	361334	120445	0.0000005189
1990	2851	2138	713	0.0000876885
2011	6061	4546	1515	0.0000412473
Comment				
Period	304	228	76	0.0008223684
Total	490995	368246	122749	

Over the course of the study, legitimating accounts drawing upon logos rationale were the most common. The top five totals for those legitimating accounts specific to the organic food institutional field were (in descending order) market, inter-organizational, moral, pragmatic, and knowledge. Figure 3 provides word totals for all the legitimating accounts identified in the study. We also tracked the total number of legitimating accounts over the timeframe of the study. As can be seen in Figure 5, the instances of all legitimating accounts experienced two distinct spikes in 1990 and 2007.

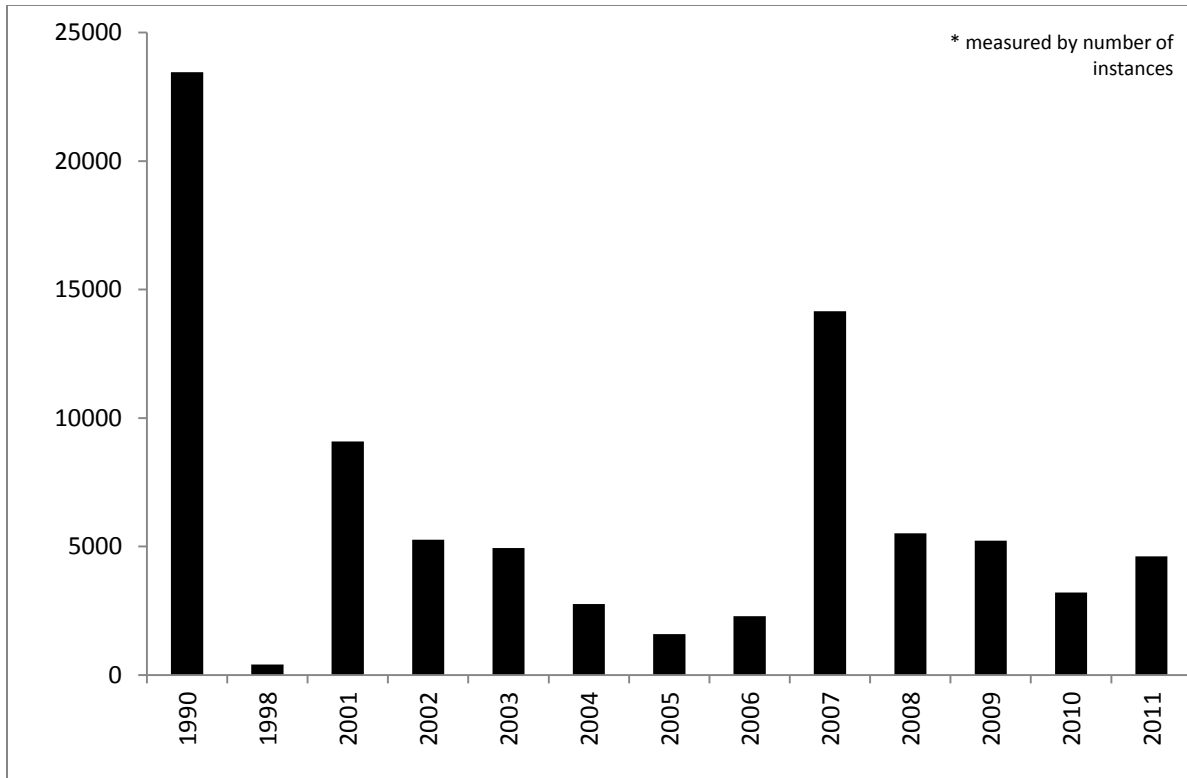


Figure 4. Number of Legitimizing Accounts over Time by word count: Main Sample

The overall number of legitimating accounts also experienced a dramatic drop in 1998. We attribute this trend to the amount of data available during that time period. Also of note was another drop from 2004-2006. We will provide interpretation of these findings in Chapter 5.

Concerned that the significant differences in the size of each text may be skewing the results, we weighted each line of text relative to the overall size of its source. To do this, we divided the relative weight of each source (.25) by the total number of lines in that source. This process is similar to the one used by Abrahamson (1997) to adjust for the size increase in his data set over time. For example, the letters submitted during the comment period comprised the smallest source of data in our study (304 lines). Therefore, to calculate the relative weight of

each phrase within that source we divided $\frac{1}{4}$ by 304. This resulted in a relative weight for each phrase in this source of 0.0008223.¹³ We then used this weight to compare the use of legitimating accounts across the various sources.

Although this transformation gave us a better indication of the likelihood of legitimating account usage in each source, some trends from the original data remained. For example the rate of legitimating accounts is still pronounced in 1990.

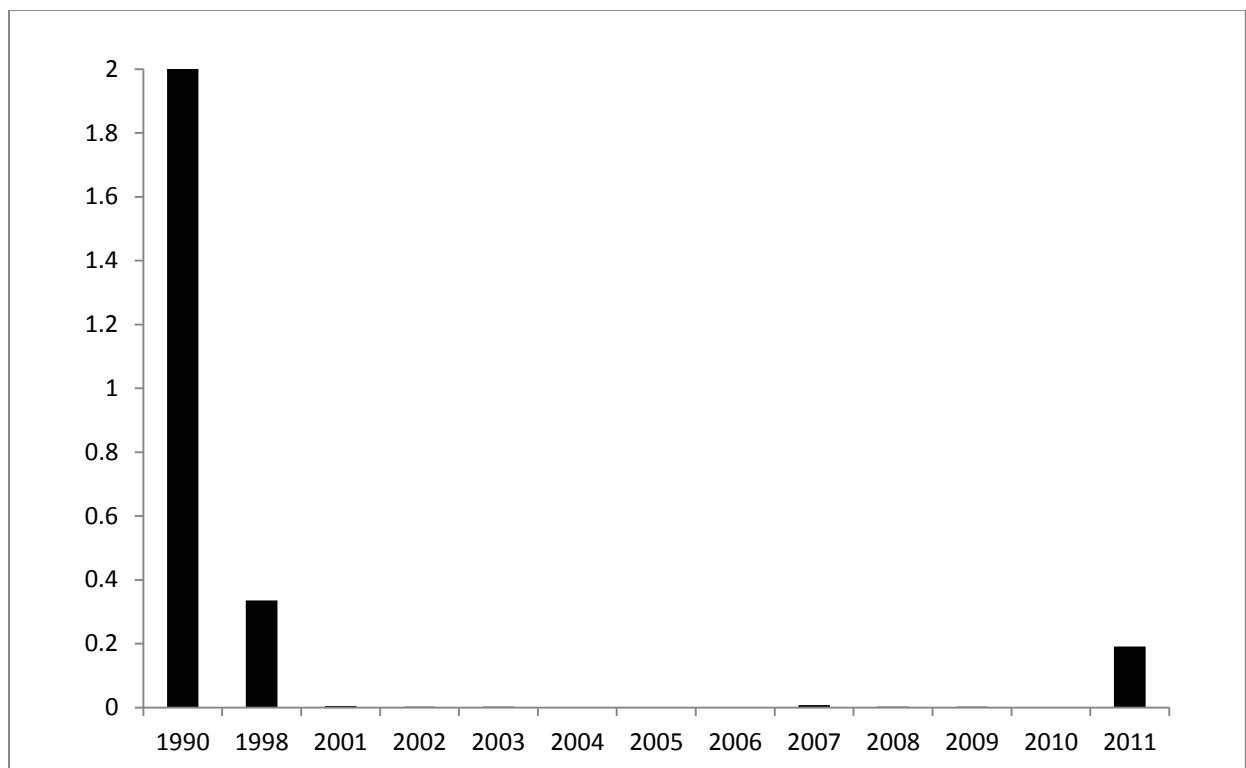


Figure 5. Rate of Legitimizing Accounts over Time Weighted by Source: Main Sample

¹³ The line totals and weight adjustments are listed in Table 3.

On the other hand, the weighted tally of legitimating accounts also brought to light some new trends. For example, the small increase shown in the untransformed data is more pronounced in 2011.

Next, we will discuss the various methods through which we established the validity of our study.

4.3 Validities

4.3.1 Quantitative Measures

As this study drew upon both quantitative and qualitative methods, we needed to assess the reliability and validity of the analysis from both perspectives. In order to assess the validity of the coding scheme from a quantitative perspective, we analyzed the stability of the coding scheme, the reproducibility of the findings, and the discriminant validity of the constructs.

To measure the stability of the analysis, rather than employing Cohen's Kappa as first proposed,¹⁴ we employed a test-retest model in which we held out 25% of the total data for later analysis. Once the initial coding was complete, we coded the hold-out sample. We then assessed the similarity of the patterns in each sample. When comparing the most common legitimating accounts in the main and holdout samples (see Figures 3 and 4), one can see similarities between the two.

¹⁴ Cohen's Kappa measures the agreement of two separate actors upon the same sample (Krippendorff, 1980). Although we calculate Cohen's Kappa when assessing the reproducibility of the coding scheme, we felt the test-retests approach on a hold-out sample (Hair, et al. 1995) represented a better measure of stability in our study.

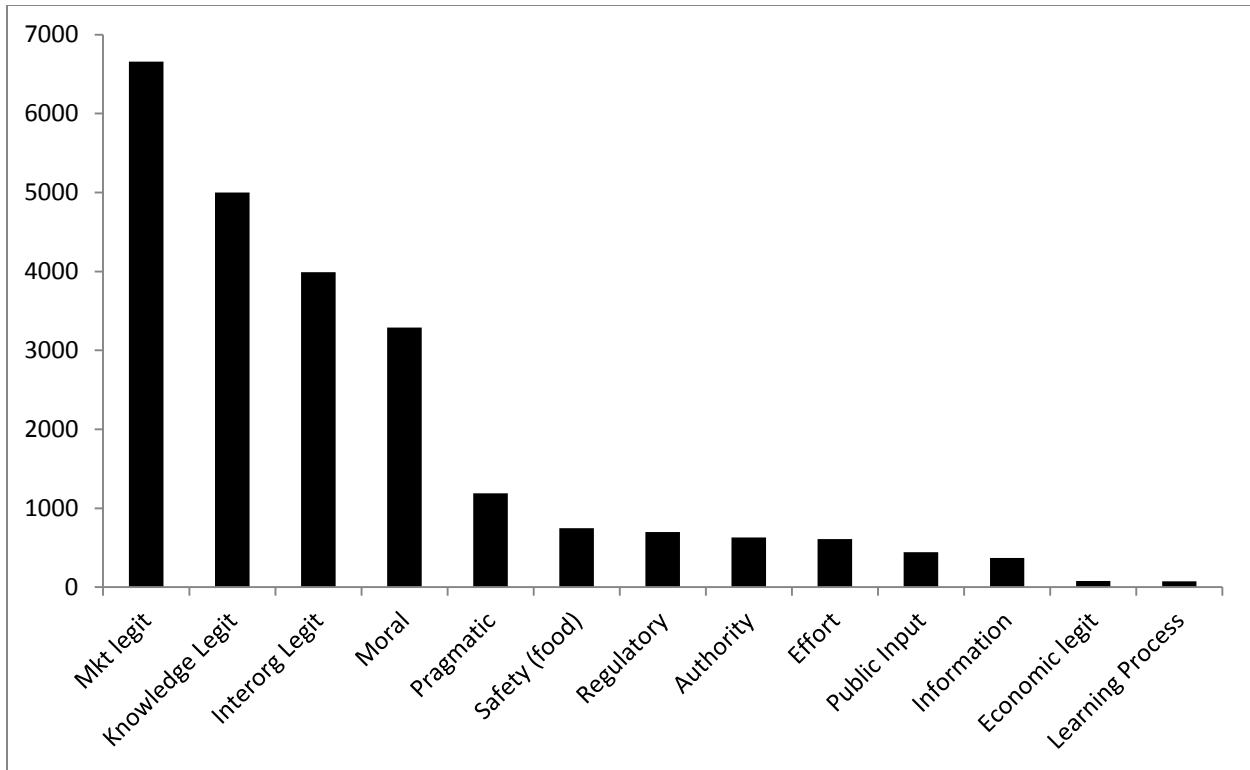


Figure 6. Total Legitimizing Accounts by Specific Type: Holdout Sample (by Word Count)

For example, the top five legitimating accounts are market, inter-organizational, moral, pragmatic, and knowledge in both samples. The stability of the analysis is also evident when comparing Figures 3 and 4. In both graphs, we see that the number of legitimating accounts was greatest during the Joint Congressional Hearing. Both graphs also exhibit marked increases in legitimating accounts in approximately 2001 and 2007. From this analysis, we can conclude that the coding scheme remained stable through the main and holdout samples, thus contributing to the reliability of the analysis.

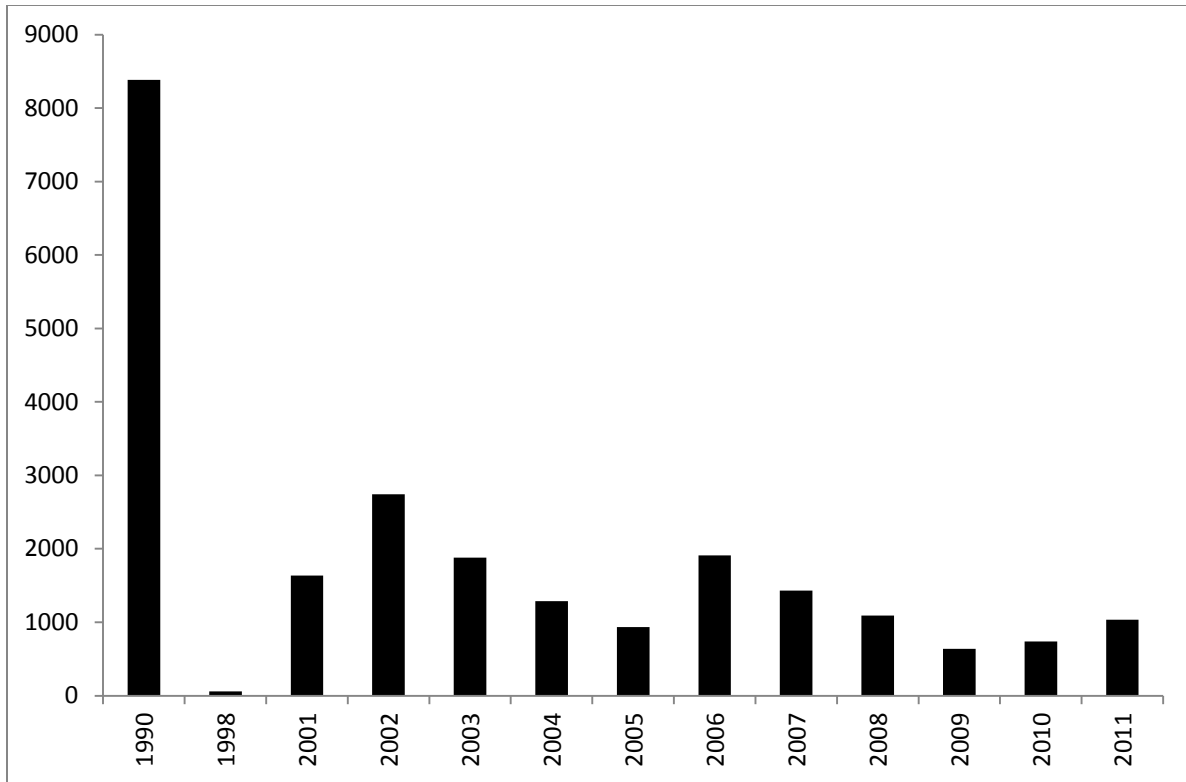


Figure 7. Number of Legitimizing Accounts over Time (by word count): Holdout Sample

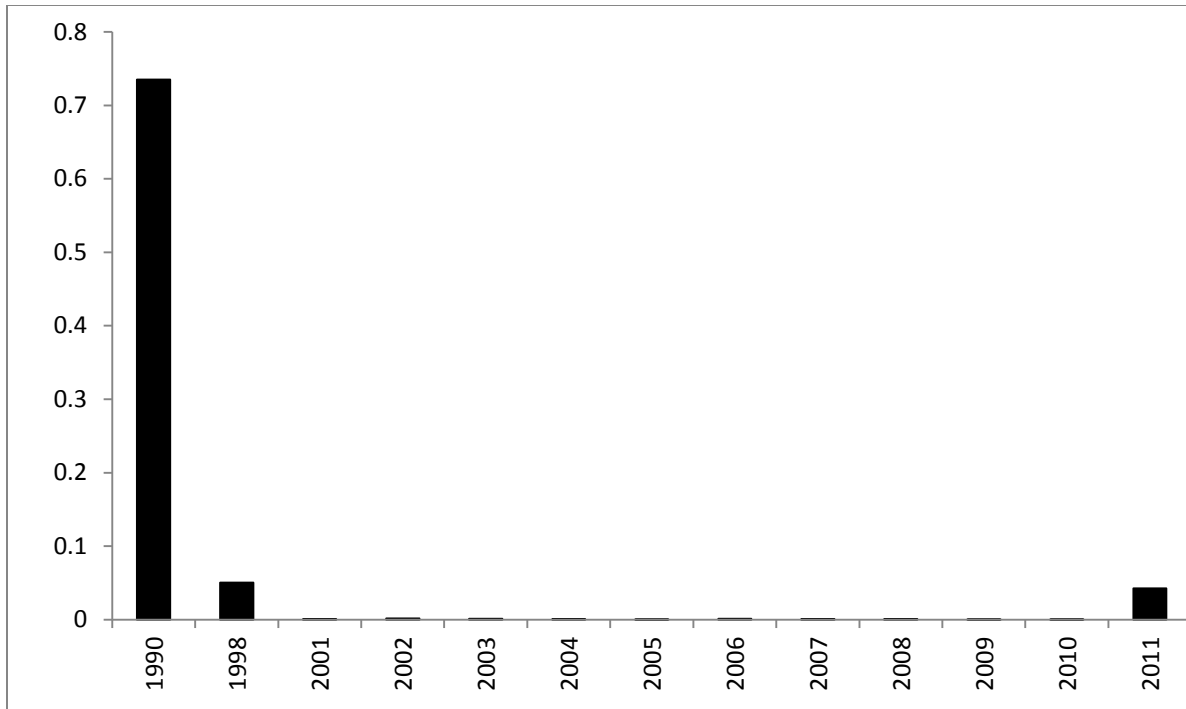


Figure 8. Rate of Legitimizing Accounts over Time Weighted by Source: Holdout Sample

To assess the reproducibility of the findings, an additional researcher was asked to code a randomly-selected 20% of the main sample. We then compared the coding of the two researchers by calculating Cohen's Kappa coefficient (Krippendorff, 1980).

Table 4

Cohen's Kappa by Legitimizing Accounts and Source

Legitimizing Accounts	Source	Kappa	Agreement	P(e) = 0.077
Legit Accts	Comment Period	0.9930	99.35%	
Authority	NOSB	0.9981	99.83%	
Economic legit	NOSB	0.9997	99.97%	
Effort	NOSB	0.9985	99.86%	
Information	NOSB	0.9989	99.90%	
Information	Listening Session	0.9993	99.94%	
Ethos Legit	1990 Congressional Hearing	0.9481	95.21%	
Ethos Legit	Comment Period	0.9515	95.52%	
Ethos Legit	Listening Session	0.9601	96.32%	
Ethos Legit	NOSB	0.9943	99.47%	
Knowledge	NOSB	0.9945	99.49%	
Knowledge	Listening Session	0.9913	99.20%	
Pathos	Comment Period	0.9427	94.71%	
Pathos	1990 Congressional Hearing	0.9517	95.54%	
Pathos	Listening Session	0.9557	95.91%	
Pathos	NOSB	0.9938	99.43%	
Public Input	Listening Session	0.9872	98.82%	
Public Input	NOSB	0.9984	99.85%	
Logos	1990 Congressional Hearing	0.9385	94.32%	
Logos	NOSB	0.9944	99.48%	
Market	1990 Congressional Hearing	0.8425	85.46%	
Market	Listening Session	0.9405	94.51%	
Market	Comment Period	0.9547	95.82%	
Market	NOSB	0.9940	99.45%	
Regulatory	NOSB	0.9982	99.83%	
Regulatory	Listening Session	0.9922	99.28%	
Food Safety	1990 Congressional Hearing	0.9641	96.69%	
Food Safety	Listening Session	0.9931	99.36%	
Food Safety	NOSB	0.9982	99.83%	
None	NOSB	0.9995	99.95%	

As can be seen in this table, all but one of the coding schemes exceeds the .90 threshold recommended by Krippendorff (1980). Thus we can conclude that these results meet the criterion of reproducibility.

To test the single discriminant validity of the analysis, we used the clusters function in NVivo 9.0. This function performs a cluster analysis based on the furthest neighbor calculation (Hair, et al., 1995). This analysis revealed a number of highly correlated categories. These results will be discussed in the next chapter.

Table 5

Correlation Matrix of Selected Constructs

Construct A	Construct B	R
Mkt legit	Ethos Legit	0.816109
Regulatory	Ethos Legit	0.719391
Authority	Ethos Legit	0.710821
Safety (food)	Mkt legit	0.69641
Regulatory	Mkt legit	0.676614
Authority	Mkt legit	0.557
Ethos Legit	Information	0.520389
Regulatory	Authority	0.50689
Safety (food)	Ethos Legit	0.494302
Mkt legit	Information	0.473166
Regulatory	Information	0.41342
Safety (food)	Regulatory	0.384552
Information	Authority	0.345894
Ethos Legit	Effort	0.338913
Safety (food)	Authority	0.32978

4.3.2 Qualitative Measures

To assess the validity of our study from a qualitative perspective, we consider the data's representativeness and consistency (Tompkins, 1994). We also considered the degree to which researcher exhibited reflexivity, contemplated the historical context of the data, and reflected the contested nature of definitions (Taylor & Trujillo, 2001).

Representativeness refers to the extent to which the text reflects the universe of material from which it was drawn (Tompkins, 1994). To our knowledge, this data represents the entirety of the public discussion regarding organic standards occurring in the federal government. Thus, this data meets the criterion of representativeness.

In this study, consistency (Tompkins, 1994) is the second qualitative measure of validity. Consistency refers to the ability to verify the accuracy of the data. With the exception of the Comment period letters¹⁵, this dataset is available to the public. Therefore, we contend that our data meets this criterion of validity.

Taylor & Trujillo (2001) identify other qualitative characteristics that lend to the validity of the study including reflexivity, historical context, and ability to portray contested meanings. One of the strengths of this study is the careful consideration of the historical context of this data. We provided the historical background of the organic food industry in Chapter 2. Moreover, the interpretation of the findings (Chapter 5) considers the particular topics being discussed at certain times in the study. Thus we contend that this study meets the historical context criterion.

Our study also exhibits reflexivity, another validity criterion of Taylor and Trujillo (2001). As recounted earlier, we made a number of revisions to our initial legitimating accounts typology after uncovering them in our analysis.

The last measure of Taylor and Trujillo's (2001) validity considers the ability of the study to highlight the contested and consensual meanings appearing in the text. Unfortunately, this represents one of the weaknesses of this study. Although the purpose of the meetings from which the data was drawn was to craft a federally-mandated definition of organic, it was not a focus of this study. Overall, however this study met all but one of the validity criteria, leading us to the conclusion that this study is valid.

¹⁵ Located in Appendix D.

4.4 Pathos Legitimizing Accounts

Pathos (moral) legitimating accounts drew upon the beliefs, values, and principles of the actor in order to evoke an emotional response from the audience. In the following quote, we see a prototypical moral legitimating account from a representative of the National Organic Program quoting Wendell Berry, a renowned farmer philosopher:

This is from 1982, one of my favorite quotes about an organic farm. And he says, "An organic farm, properly speaking, is not one that uses certain methods and substances and avoids others. It is a farm whose structure is formed in imitation of the structure of a natural system that has the integrity, the independence, and the benign dependence of an organism.

In this quote the actor is conveying his moral beliefs regarding organic agriculture. Furthermore, the quote contains two fundamental elements of moral legitimating accounts in the organic food institutional field. First, it eschews a technical definition of organic; refusing to adhere to a definition based on substances or methods. Rather, this actor is arguing for a particular approach or morals. This perspective stands in stark contrast to the pragmatic view of organic agriculture, which is based on the type of input present in production. Second, the actor is articulating a common tenet of the moral element of organic agriculture. The Wendell Berry quote emphasizes the importance of the harmony between agricultural practices and nature.

However, the preceding quote does not capture all the main themes evident in pathos (moral) legitimating accounts of organic food production. The next quote illustrates other important topics, such as the intrinsic value of organic methods and its contribution to humanity:

Every now and then you wake up in the morning and you have a feeling of satisfaction that perhaps you've done something or [sic] in the middle of a process of doing something very good and that's what's happened to me. I think that we're on the brink of doing something good for humanity and for the planet in what we're doing here today.

When looking at the general trend of moral legitimating accounts over the timeframe of the study, they seem to follow the overall trend of legitimating accounts, but peaked above the average in 2007.

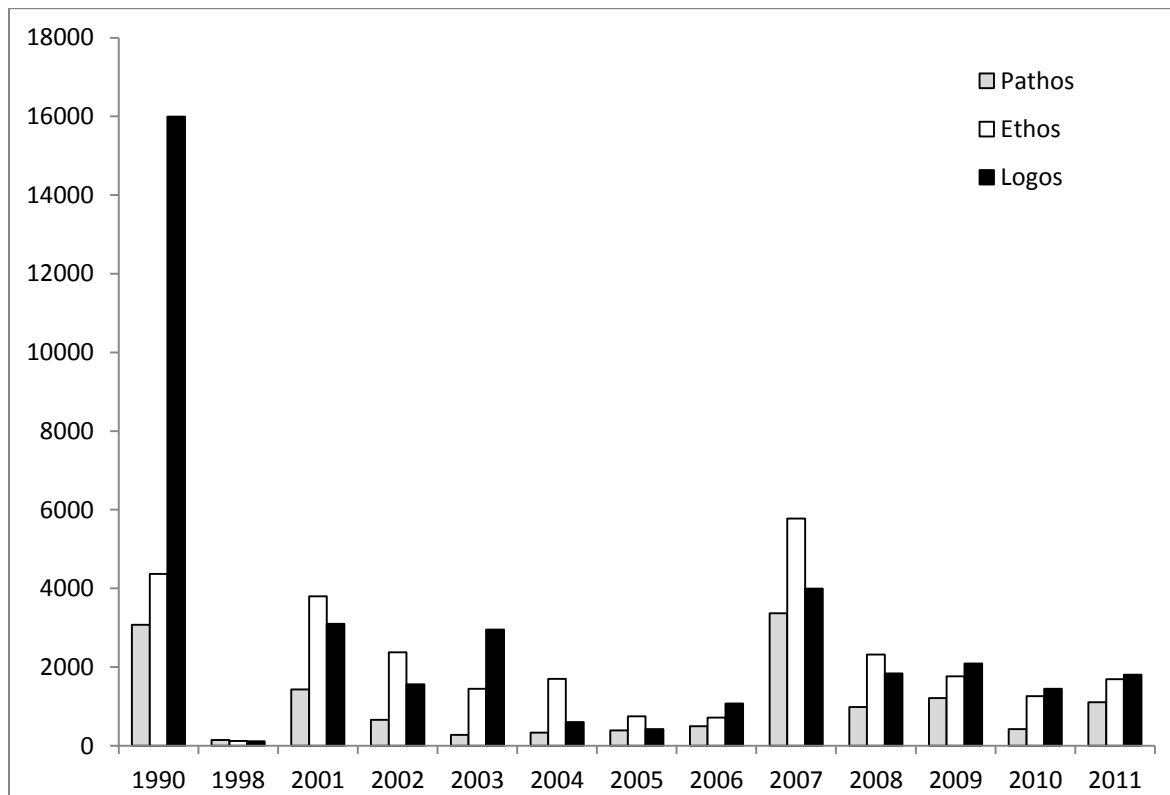


Figure 9. Legitimizing Accounts over time: Main Sample

4.5 Logos Legitimizing Accounts

As a contrast to pathos legitimating accounts, logos (pragmatic) legitimating accounts tended to feature rational arguments based on efficiency, scientific evidence, food safety, and productivity. The following quote by an organic inspector and NOSB member provides insight into the conflict between organic methods and pragmatism. “Logic's a wonderful, wonderful scientific tool, and organic isn't necessarily always logical, but that doesn't mean it's wrong.”

This quote raises a number of interesting points. This actor – an individual who is tasked with shaping, as well as enforcing, federal organic policy – recognizes that organic methods and logic are sometimes at odds. Such a statement should come as no surprise to anyone familiar with the organic industry, as a number of organic techniques are not necessarily supported by conventional scientific methodologies. However, the more interesting point is that this committee member feels as if organic methods may still be valid even if they are not perceived to be logical. Such a statement represents only one NOSB’s members’ opinion, yet it exists in stark contrast to the standard logos (pragmatic) legitimating accounts.

The following quote from a representative from the Agricultural Marketing Service illustrates some of the traditional topics within this type of legitimating account. “We have a quality system in place in our branch. We have our own quality manual. We have our training set up. We control all our documents.” The preceding quote, with its reference to strong internal controls and dedication to quality – an important concept in manufacturing strategy (Deming, 2000) – includes typical topics found in pragmatic legitimating accounts.

Like ethos (moral) legitimating accounts, pragmatic legitimating accounts peaked in 1990, comprising 1600 words of the Congressional Hearing. After the fall-off of all legitimating

accounts that occurred in 1998, the logos legitimating accounts experienced three additional peaks (2001, 2003, and 2007) (Figure 9).

4.5.1 Marketing Legitimizing Accounts

Market legitimating accounts comprised the largest subset of logos (pragmatic) legitimating accounts. These arguments often referenced economic gains or consumer behavior. A representative example follows:

I started the organic egg business in this country, and I was pleased to do so before the legislation came out on organic stuff.... So -- but I'd like to talk on size of the -- of operations. I think if -- people kind of throw rocks at me because I am 67,000 hens and about 20,000 pullets, but I think the law of the supermarkets is dictating, and if you don't go along with the supermarket -- as they increase in size, you have to increase in size or you lose your business. And I'm not going to increase anymore; I'm going to increase about 10 percent, one barn, and that's it. I'm calling an end and I'm going to diversify. But I just thought I'd make that statement, because a lot of people do throw rocks at people that are bigger, and I think the opportunity is to get bigger.

Here we see the actor employ a great deal of terminology associated with market legitimacy. He takes credit for launching the organic egg business in the United States and discusses the pressures to increase his business.

Market legitimating accounts were the most prevalent type of legitimating account during the 1990 Congressional Hearing, comprising almost 10,000 words and more than doubling the next most common legitimating account (see Figure 10). After the 1990 hearings, market legitimating accounts followed a similar trend as the general legitimating accounts.

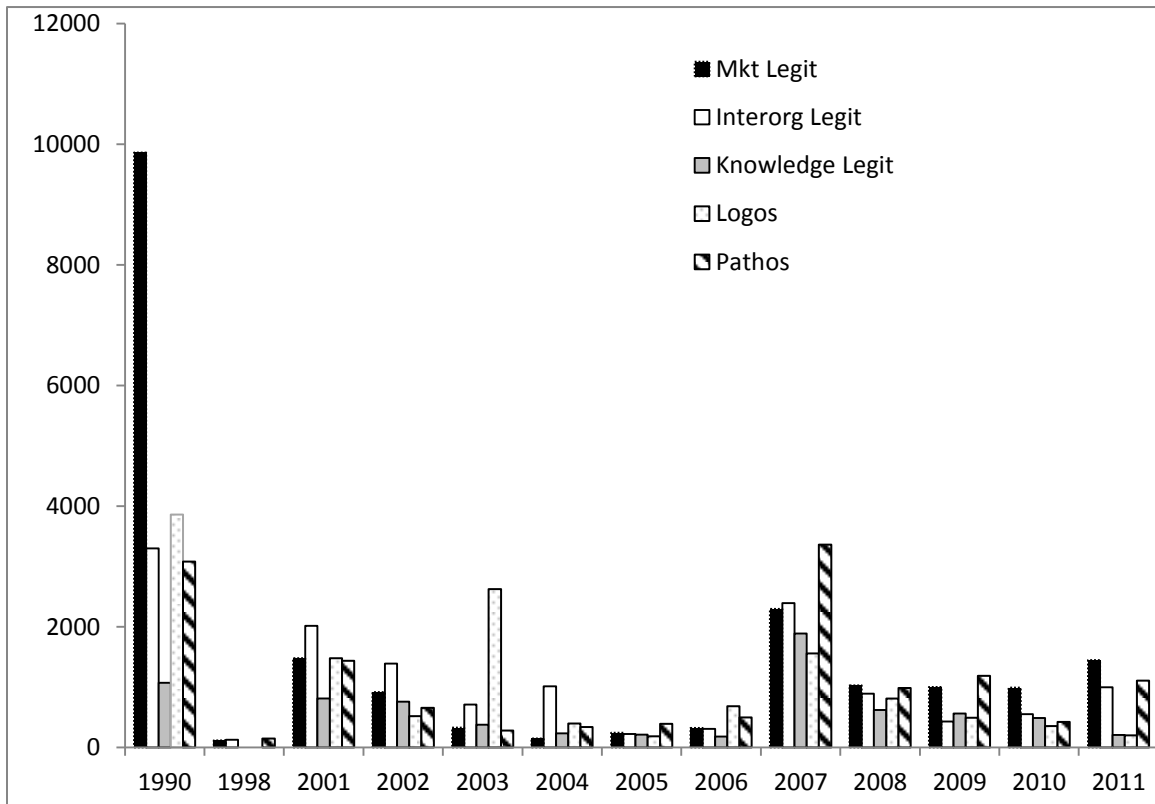


Figure 10. Legitimizing Accounts with Market-based Legitimacy over Time (by word count)

4.5.2 Food Safety

Legitimizing accounts referencing food safety often occurred when an individual approached the National Organic Standards Board (NOSB) to tout the benefits of a product or process. In the following example the actor is housing his justification of the use of vaccinations in poultry in the language of safety. “I do rely heavily on the protection that vaccinations

provide. I am a believer in that. We have the tools, and given the time we can adequately prevent the birds from getting the diseases that they're challenged with.”

4.6 Ethos Legitimizing Accounts

The most common type of ethos legitimating accounts during our period of analysis involved actors referencing other actors, organizations, or institutions in order to provide credibility to their statements; a phenomenon we referred to as inter-organizational legitimacy. This term is attributable to Galaskiewicz, who identified a number of strategies organizations employ to secure legitimacy. Inter-organizational strategies seek to create a connection between the organization and “cultural symbols and/or legitimate power figures in the environment” (1985: 296).

This type of legitimacy is similar to normative legitimacy or normative isomorphism (DiMaggio and Powell, 1983), as it signals the actor’s congruence with the referenced entity. It is also similar to Van Leewan’s (1999) “authorization,” a process in which the actor draws upon the legitimacy of another actor or organization. Inter-organizational legitimacy differs from Van Leewan’s authorization though, as the actor or organization referenced by the actor does not necessarily have to be recognized as legitimate by institutional forces. We contend it is a different concept as it includes references to both named and unnamed associations. Consider the following two examples:

I've been involved in the industry through [the] OTA [Organic Trade Association]. I chaired the MPPL [Manufacturing, Processing, Packaging, and Labeling] Committee to the American Organic Standards. I've also served on the California Organic Advisory

Board and, as you know, I was on the NOSB for five years from 2000 to 2005. I chaired the materials committee and also acted as board secretary.

In this quote we see the authorization tactic, as the actor is evoking three well-known organizations in the organic industry in order to lend legitimacy to her argument. The mention of these prominent associations signals to the audience that the actor is a prominent figure in the industry and the legitimacy of those organizations can be transferred to her. However, actors can reference inter-organizational legitimacy without naming a particular association as evidenced in the following quote: “I’m speaking on behalf of 400 certified producers more than half of whom are dairy and livestock producers...”

Although the actor does not mention a well-known, or even official, organization, this speech act intends to establish the actor’s legitimacy because the dairy and livestock producers referenced are willing to be represented by the actor. Such an act denotes an overlap in the interests of the actor and the parties represented. Moreover, it signals a “strength in numbers” form of legitimacy. Although this particular legitimating account contains elements of morality we argue the emphasis here is upon the number of producers represented by the actor.¹⁶

Finally, the following selection of text demonstrates the full extent to which this strategy can be utilized:

In 1972 I first helped form a co-op to provide a way to obtain organic foods while growing organically on small scale. In 1976 with Bellevue Gardens Organic Farm we

¹⁶ This quote, like many found in this study contains elements of other legitimacies. In those cases, the quotes were counted more than once. In this case, we coded this statement as pathos, ethos, and logos, specifically inter-organizational and regulatory legitimating arguments.

started farming several hundred acres and I still own approximately 150 acres myself and my sister some other land. In 1987 I helped form Florida Certified Organic Growers and Consumers and later became executive director of a growing consumer organization. I've been an accredited inspector and have done inspections internationally and nationally. I serve and will make statements at times representing the seven sustainable agriculture working group among the board. I've served as the past chair of the Organic Certifiers Council for the OTA for two terms. I serve on the National Campaign for State Agriculture Organic Steering Committee and since 2001 and though currently I serve on the board of directors of the Organic Trade Association although my comments should never be interpreted as the official position of the Organic Trade Association. And I currently serve on the board of directors of the Accredited Certifiers Association.

Although the previous statement contains other legitimating strategies, such as the actor's reference to his experience farming organically, the majority of the statement intends to situate the actor within a network of credible organizations (Organic Trade Association, Florida Certified Organic Growers and Consumers, etc.) and thereby signally the legitimacy of his claims. Inter-organizational legitimating accounts followed the overall trend of legitimating accounts over the timeframe of the study, experiencing peaks in 1990, 2001, and 2007.

4.6.1 Knowledge legitimacy

Another type of ethos legitimating account was characterized by references to the actor's knowledge. These legitimating accounts often referenced the actor's level of expertise, academic credentials, or first-hand knowledge. The first quote is illustrative of the expertise argument:

Being a nutritionist, I know that there are alternatives.

The second quote illustrates the way an actor uses their academic credential to appear legitimate:

I say that as someone who actually at one time got a Ph.D in ecology.

The last quote shows is representative of those knowledge legitimating accounts that reference the actor's first-hand knowledge: "I have worked in organic vegetable farming for 12 or 13 years from California. I'm an agronomist and pest control advisor by trade, and I'm looking forward to sharing this experience." Knowledge based legitimating accounts were the least likely of the top five specific legitimating accounts to appear in the dataset. However, they followed the general trend of legitimating accounts over time.

4.6.2 Public Input

Legitimating accounts concerning public input also surfaced during our analysis. These arguments claimed their legitimacy because the actor had carefully considered public opinion. An example from an NOSB member is indicative of the tenor of many of these statements.

We received a lot of comments on this and I went through all the comments and I can't read all of them but there was a consistent strain in the comments that opposed removal.

There was a lot of comments as everybody's heard from people who supported the

motion to remove. A lot of comments. Some of them were very short and others were more lengthy. There was a lot of short ones. And so that's good and we looked at all of those but we also looked very carefully at the ones who did oppose their removal.

4.6.3 Effort

Another specific theme occurring in within ethos legitimating accounts were to reference the amount of work or effort expended by that the actor. In other words, the validity of the actor's position was buttressed by the degree of effort exerted by him or her. One example came from a representative of a major organic retailer, speaking to the issue of certification. "...these auditors will spend about 10,000 hours auditing our stores for organic compliance, three to four hours per month, in each of our 270 stores." While this particular example of the effort legitimating account quantified the effort of the actors or their organization, other statements were less exacting: "The tremendous efforts that have gone into all of these discussions of late. We have made enormous progress, I think."

4.6.4 Information dissemination

Finally, the last legitimating account to emerge during the analysis was a tendency of certain actors to reference their own efforts to disseminate information. A representative legitimating account comes from one of the major certifying agencies.

[*Organization's Name*] offers itself as a technical resource, institutional memory, and vehicle for information collection and dissemination on materials decisions made in

organic production and handling. People need consistent and timely answers in a way that is broadly supported by all stakeholders.

This statement is useful because it not only provides the particularities of the information that the organization disseminates, but it also contains the rationale for why the actor feels that service is important.

4.7 Legitimizing accounts by source

We also analyzed the weighted appearance of the different types of legitimating accounts within each source. The Joint Session of Congress (1990) text demonstrated a markedly higher rate of specific legitimating accounts than other sources. Also noticeable in this analysis is that logos legitimating accounts comprise the majority of legitimating accounts in 1990. Lastly, the NOSB minutes feature very few legitimating accounts of any kind.

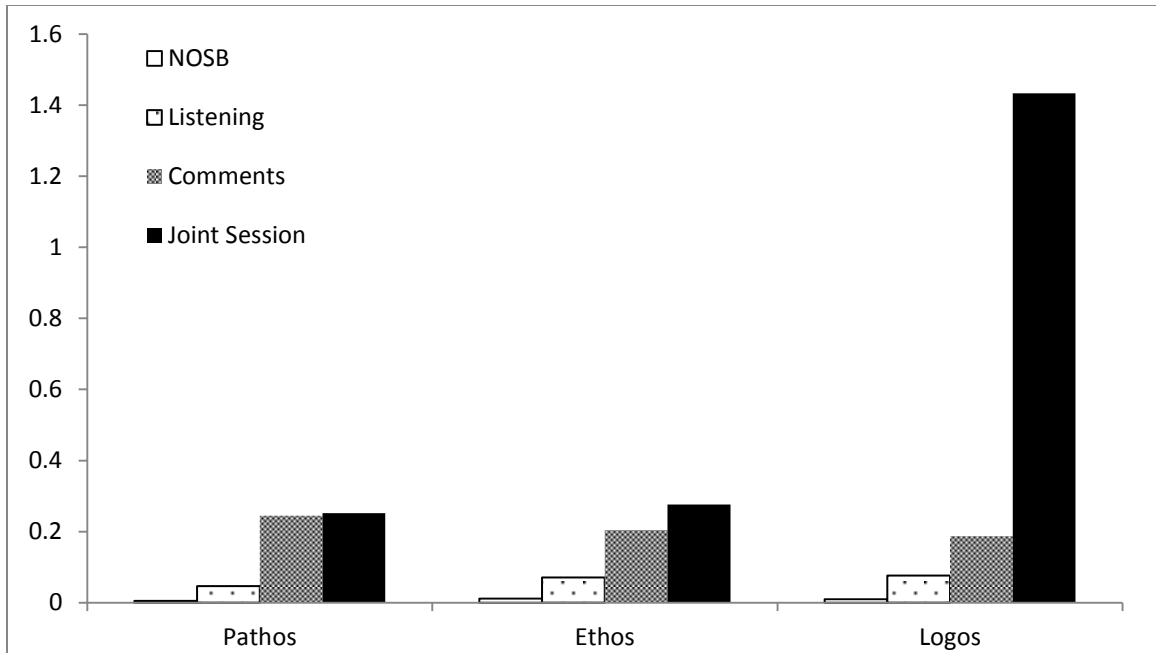


Figure 11. Weighted Legitimizing Accounts Types by Source

The breakdown of specific legitimating account types during this time generally reflects the overall trend in the data, with market legitimating accounts being the most common type. However, there are some differences between the 1990 meetings and the overall pattern. Most noticeable is the predominance of safety, knowledge, and pragmatic legitimating accounts.

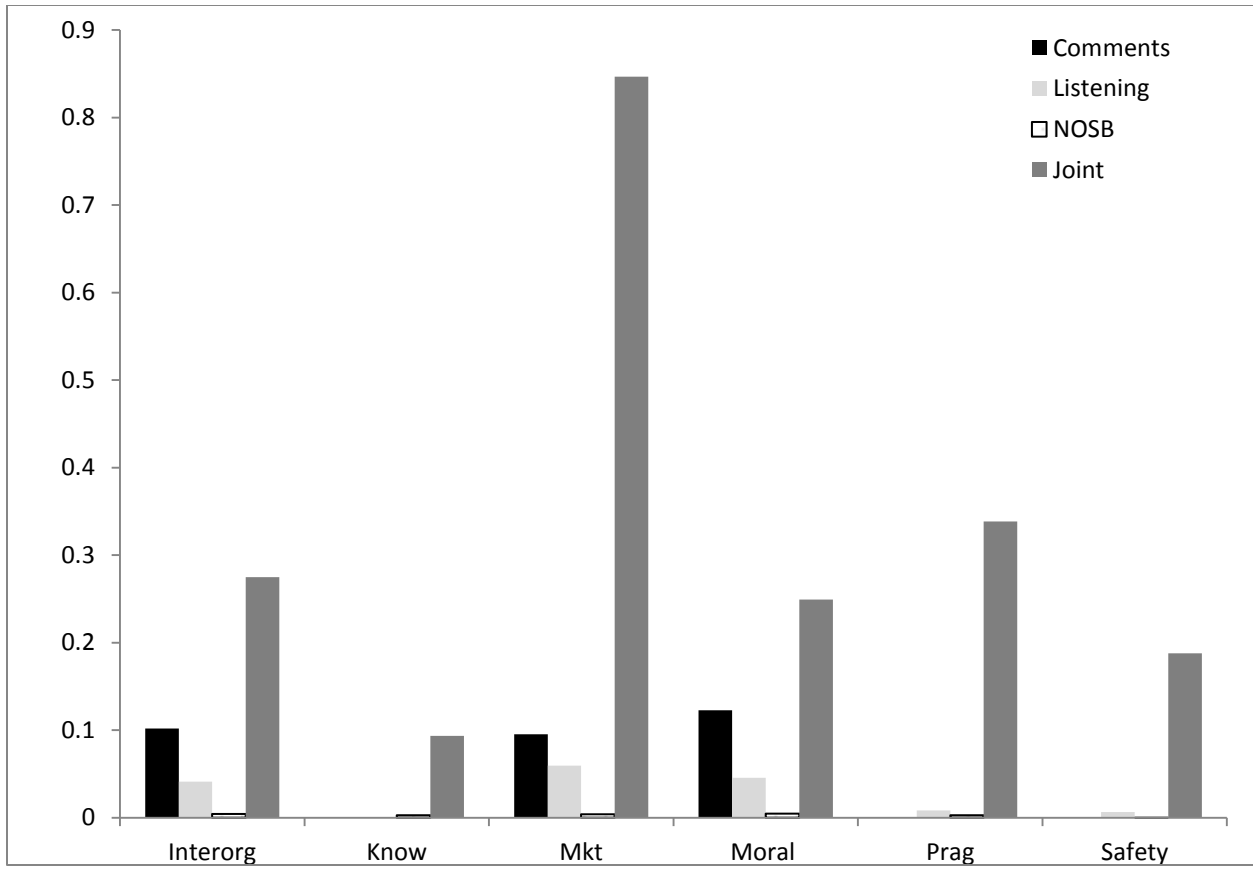


Figure 12. Weighted Specific Legitimizing Accounts by Source

Also noticeable in Figure 11 is the different composition of legitimating accounts in the Comments period. These legitimating accounts seem solely to rest on moral, market, and inter-organizational legitimacy. Finally, due to the very high numbers in the Joint Session, variance within the NOSB minutes was indistinguishable. Because of this, we broke out the NOSB minutes and performed a separate analysis. Figure 13 summarizes the result of the broad categories analysis.

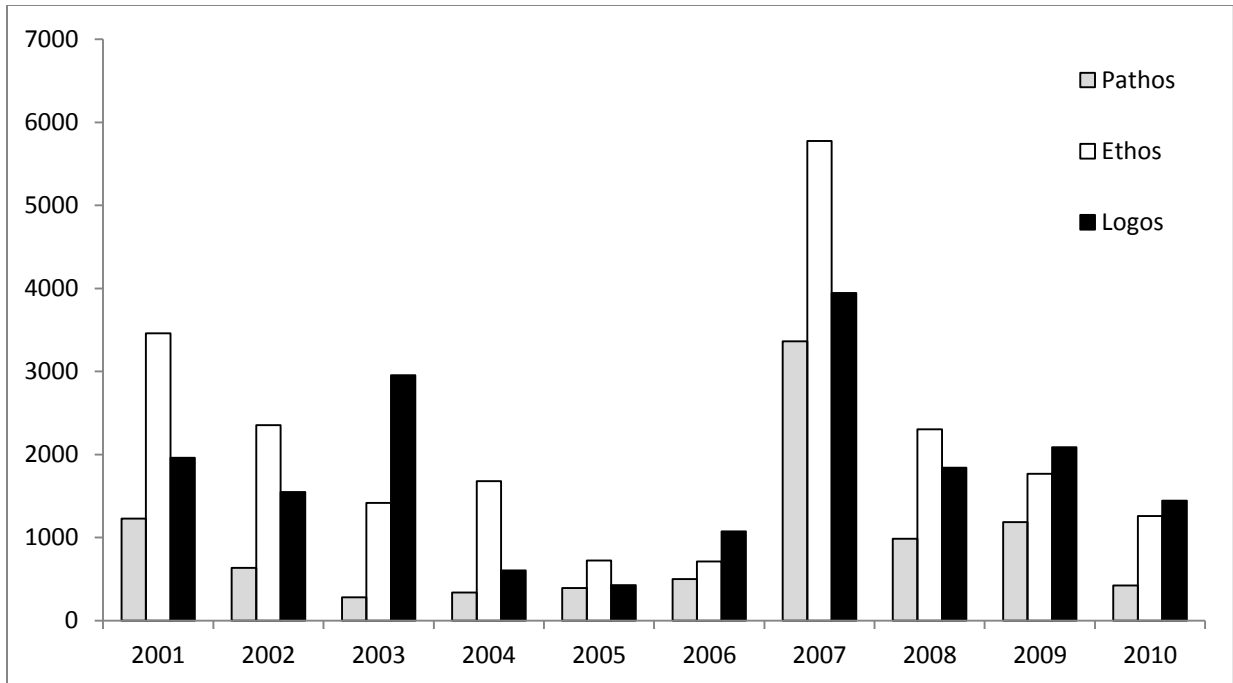


Figure 13. Types of Legitimizing Accounts in NOSB over Time (number of speech acts)

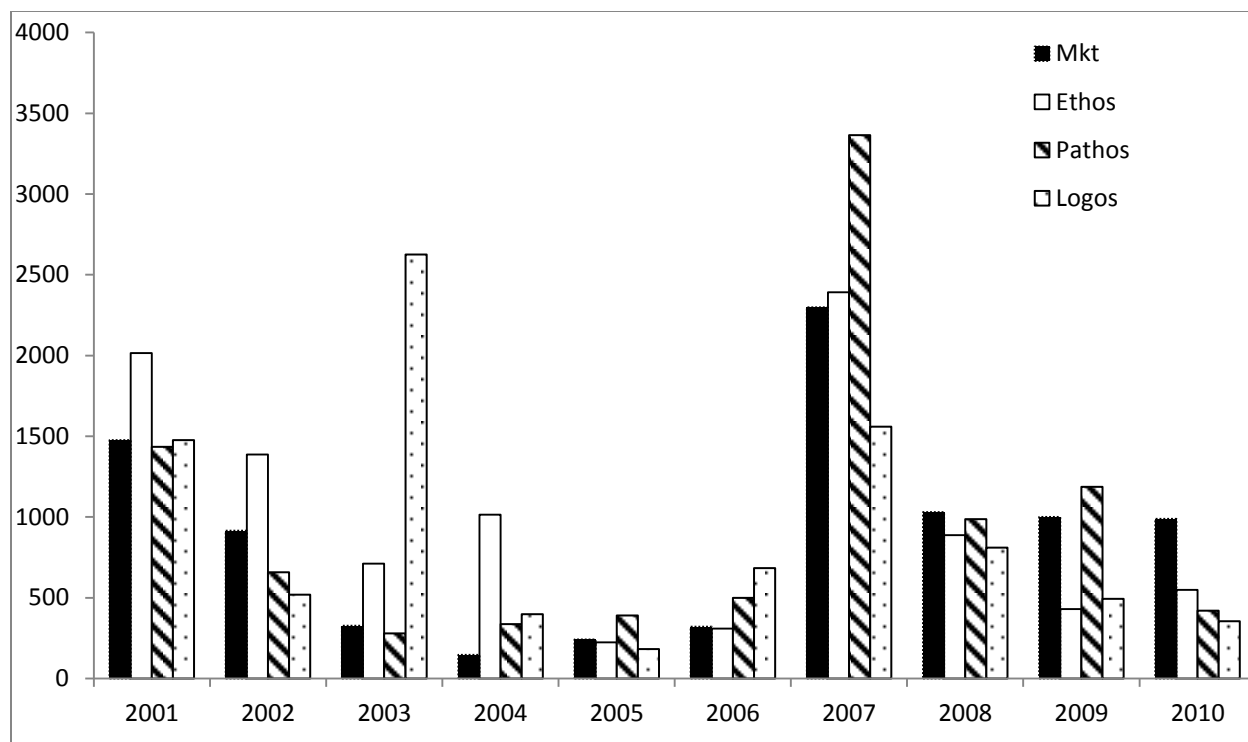


Figure 14. Types of Legitimating Accounts in NOSB minutes over Time with Market-based Legitimating Accounts (number of speech acts)

When the NOSB minutes are analyzed separately, we once again witness the increase in legitimating accounts in 2007. This increase was led by moral arguments, but the other three predominant types experienced peaks as well.

4.8 Comparison of Actor Types

4.8.1 Organic vs. Conventional Food

To assess any difference in their legitimating accounts of the different actor types, we split the data into organic movement firms and conventional food producers. An analysis of all

legitimizing accounts showed that actors in the organic movement were three and half times more likely to use legitimating accounts than their conventional food counterparts (6167 to 1739).

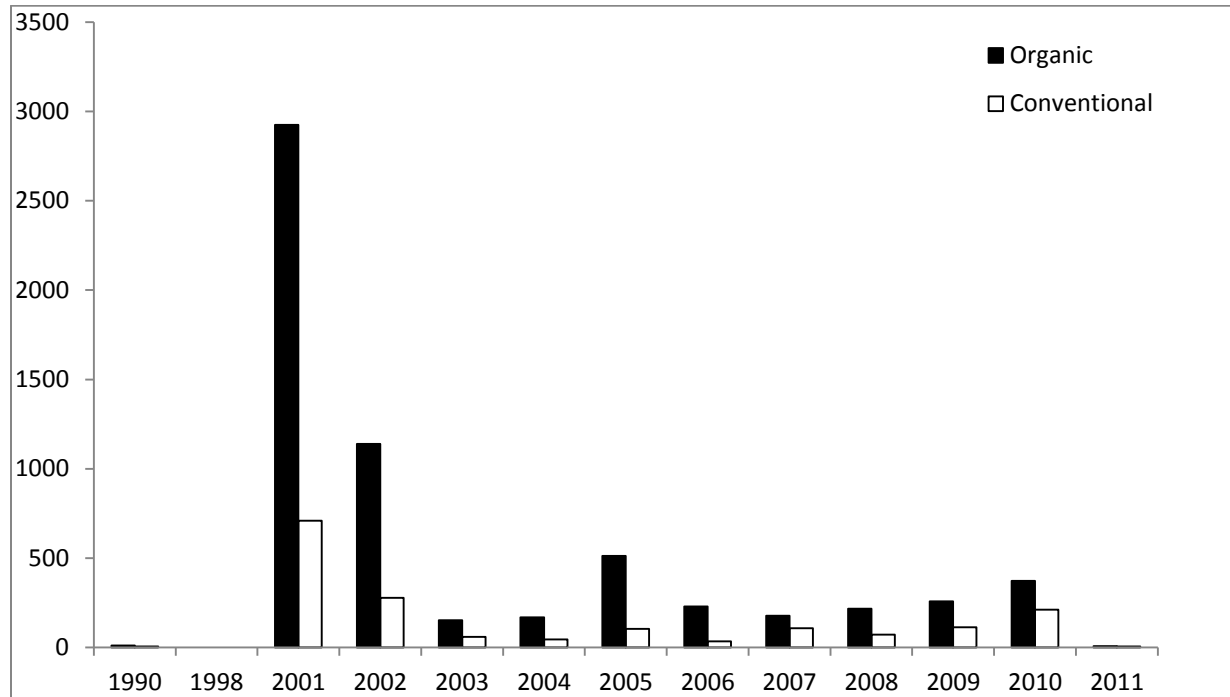


Figure 15, Comparison of Total Legitimizing Accounts: Organic Movement vs. Conventional (number of speech acts)

We also examined the use of legitimating accounts of the organic food movement and conventional food actors over time. Some interesting details emerged (see Figure 14). First, the largest difference in the total legitimating accounts between the two types of actors occurred in 2002, with the organic movement actors providing more than four times the number than the conventional food industry. After 2002, both types of actors generally decreased the rates. The

organic movement actors had a slight increase in 2006 and 2011 by the organic movement, but trended just above their conventional food counterparts.

An analysis of the type of legitimating accounts used by each actor revealed a few surprising trends. The legitimating accounts of the organic movement actors experienced three distinct spikes in usage (1990, 2001, and 2007). However, we are apt to consolidate the spikes in 1990 and 2001 into a single increase as the small size of the 1998 sample is most likely artificially depressing the usage at that time. Also skewing this result is the fact that most of the actors in the 1998 Comments Period chose to remain anonymous, thus preventing the attribution of these legitimating accounts to a particular actor type. So while there were over 400 words identified as a legitimating account during this time, only 14 words could be attributable to the organic movement. Therefore, for all actor types, there is a precipitous drop in legitimating accounts in 1998.

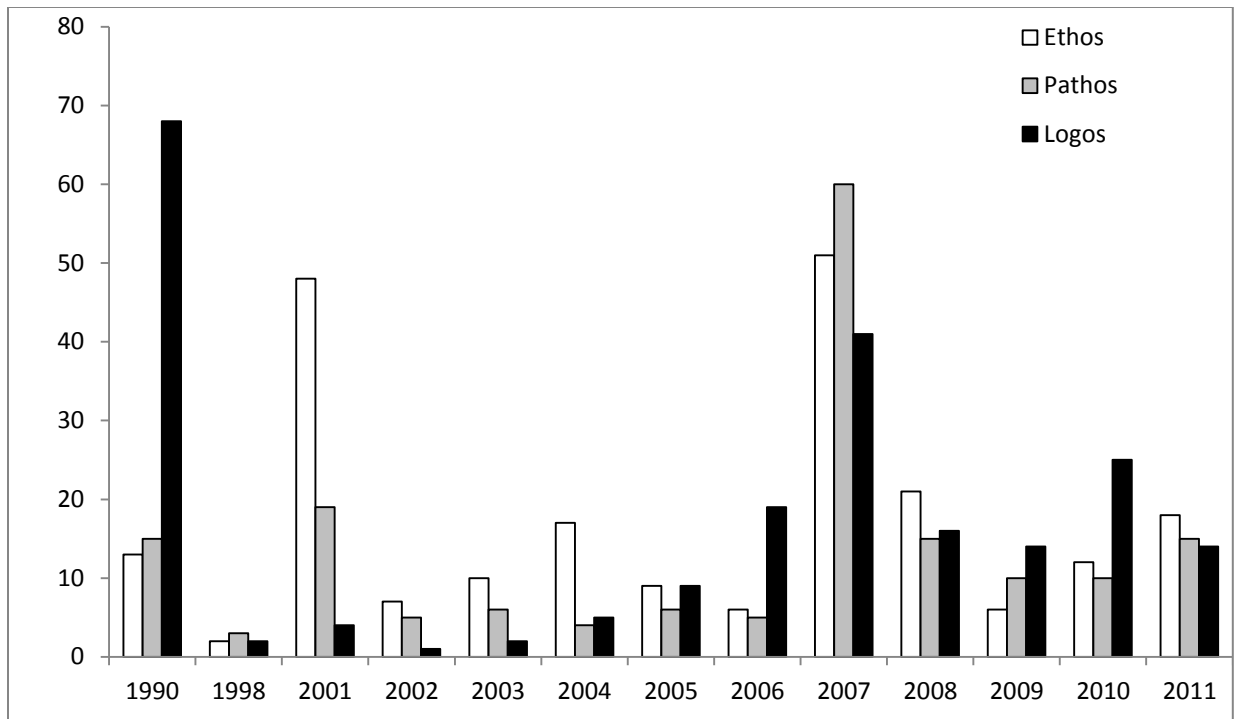


Figure 16. Organic Movement Actors' Legitimizing Accounts over Time by Type (number of speech acts)

Logos legitimating accounts were overwhelmingly prominent early in the organic discussions, whereas ethos legitimating accounts were dominant in early NOSB discussions. The last increase in legitimating accounts by the organic movement however, featured all three types relatively equally.

We also broke the marketing legitimating accounts out from the other logos legitimating accounts.

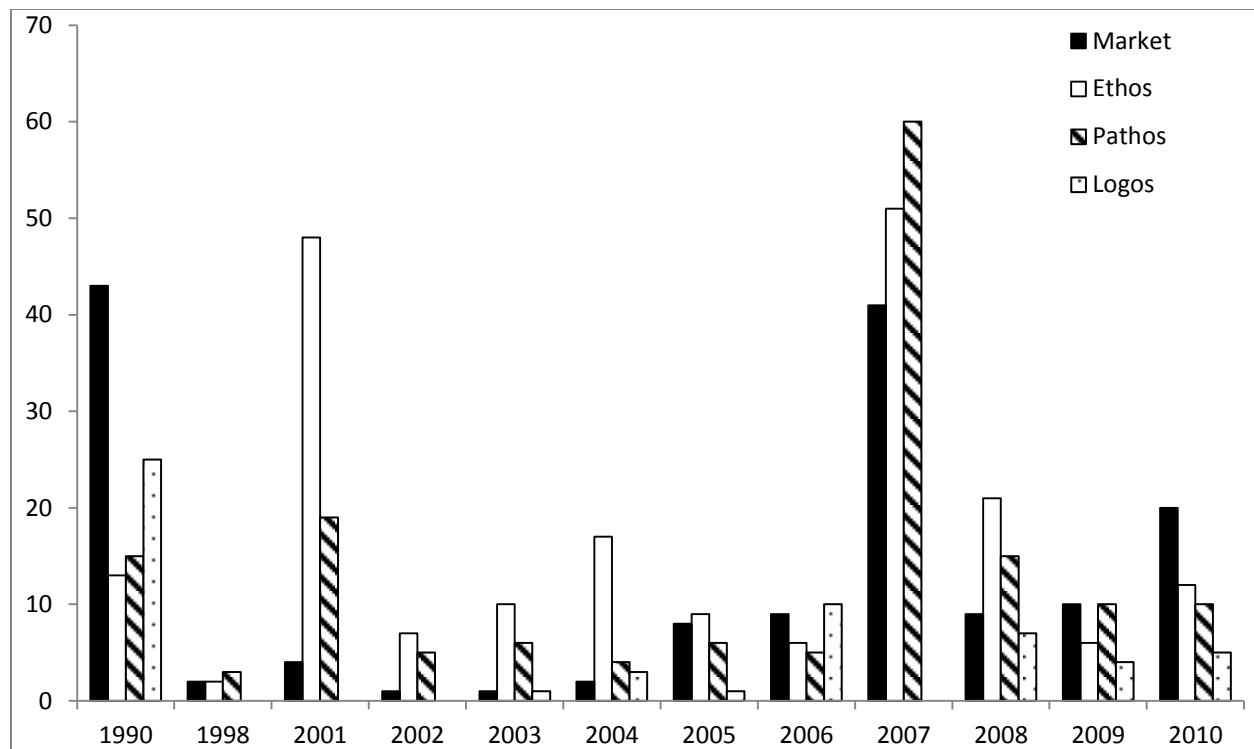


Figure 17. Organic Movement Actors' Legitimizing Accounts with Market based over Time by Type (number of speech acts)

Figure 17 shows the rate of the market based legitimating accounts relative to the other logos legitimating accounts, as well as the ethos and pathos legitimating accounts. It is notable that, with the exception of 1990, market-based legitimating accounts represented the majority of logos legitimating accounts across the time of the study. Yet by 2001, it is the second least common. Rather, pathos legitimating accounts rise dramatically at this time.

Plotting the conventional food actors' legitimating accounts over time also reveals some interesting results. First, conventional food actors were not present during the 1990 Congressional Hearings. Thus, there are no legitimating accounts attributable to that group

during that time. As we have seen, the conventional food actors in the study were less likely to employ legitimating accounts than their organic movement counterparts; however their usage patterns were similar. The conventional food actors also experienced two spikes in legitimating accounts (2001 and 2006), but the increases accounting for their second spike occurred one year earlier than the organic movement.

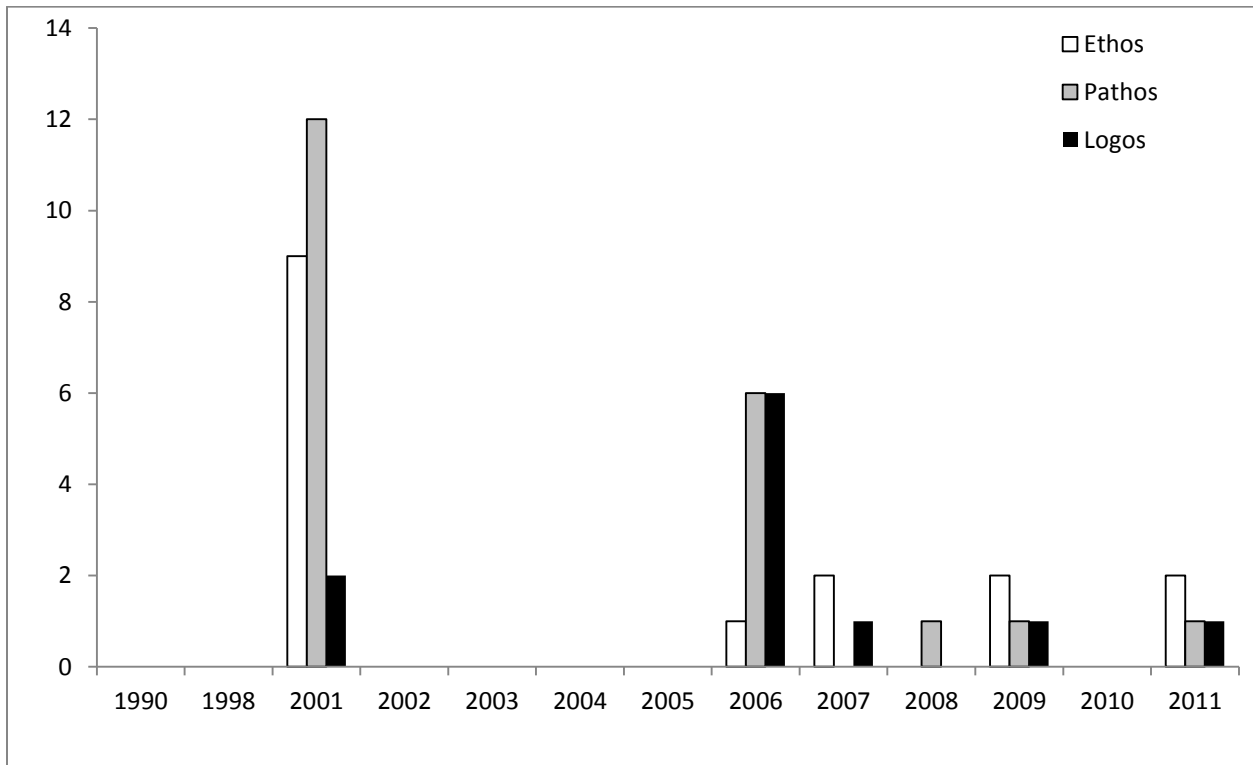


Figure 18. Conventional Food Actors' Legitimizing Accounts over Time by Type (number of speech acts)

The second interesting trend is the absence of legitimating accounts between 2002 and 2005. Also notable in the conventional food actors' use of legitimating accounts is that in the first spike, logos legitimating accounts were virtually absent, but quickly rise to prominence in 2006. Another interesting pattern revealed in the analysis proved to be the conventional food actor's

use of ethos legitimating accounts, as these spike in 2001, but then recede for the remainder of the timeframe of the study.

When we separated market-based legitimating accounts from the other logos legitimating accounts for the conventional food actors, the prevalence of the market-based arguments is noticeable. In fact, other types of logos legitimating accounts are all but absent from the conventional food actors' accounts.

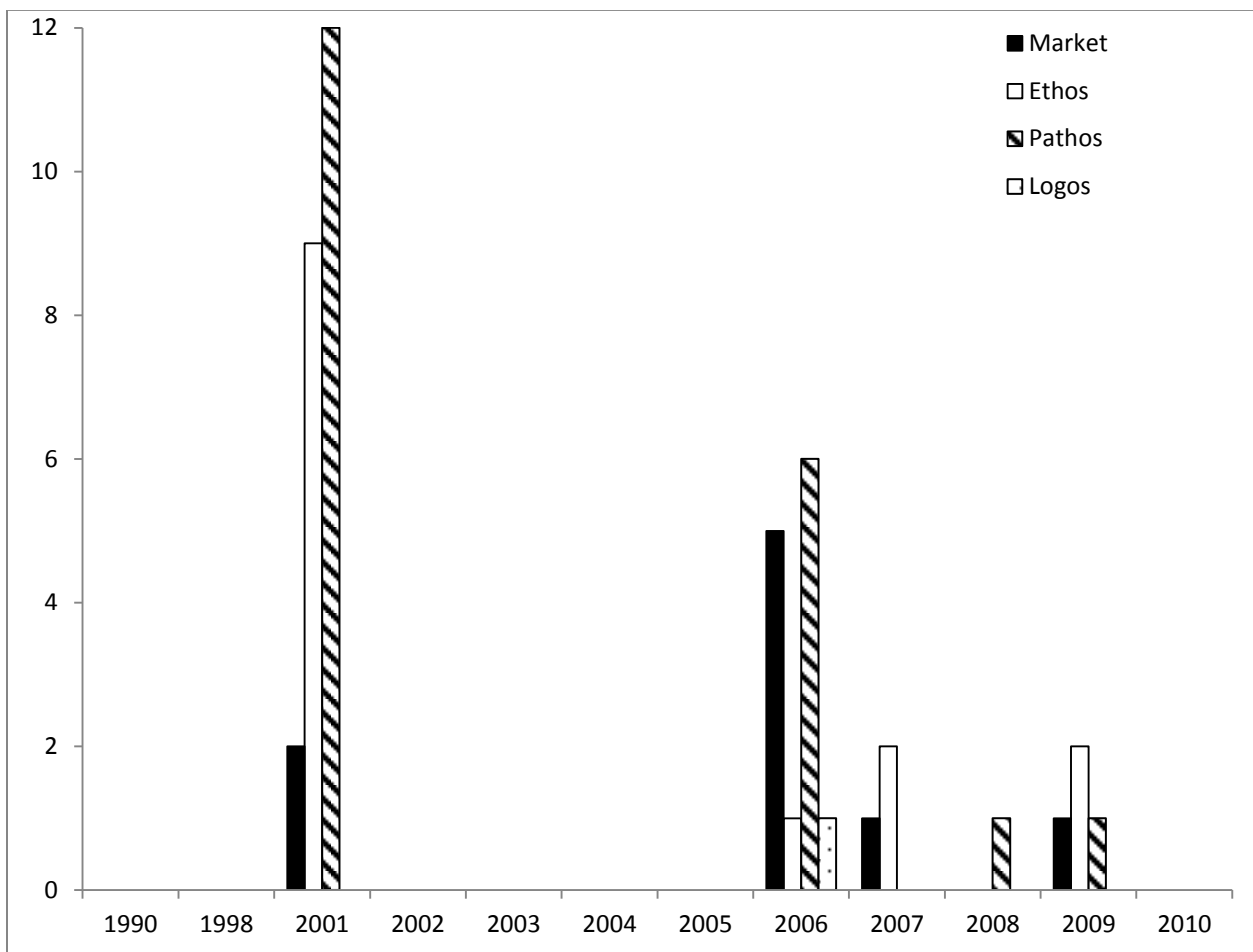


Figure 19. Conventional Food Actors' Legitimizing Accounts with Market based over Time (number of speech acts)

To gain a better understanding of how each actor type was using the different types of legitimating accounts, we calculated the propensity of each actor type to use legitimating accounts.

Table 6

Rate of Legitimizing Accounts: Organization Type (by word count)

	Total	% of Overall	LA	LA Rate
Organic	862910	38.1%	18837	2.2%
Corporate Organic	291076	12.8%	15846	5.4%
Conventional	243469	10.7%	12222	5.0%
Consumer	56954	2.5%	3074	5.4%
Government	234266	10.3%	6974	3.0%
Inspector	239576	10.6%	11370	4.7%
Unknown	337269	14.9%	6241	1.9%

To do so, we first calculated the total number of words attributed to each actor type. As can be seen in Table 6, actors in the organic movement comprised the majority of the discussion. Organic actors spoke 862,910 words in the main sample of our study. In other words, organic actors accounted for 38.1% of all the discussion occurring in these forums and more than doubled the amount of speech attributed to the corporate organic actors, the second most verbose group.

When we tracked the amount of speech attributable to each actor type over time (Figure 20), we can see the organic movement actors dominated the discussion in 2001 by a wide margin.

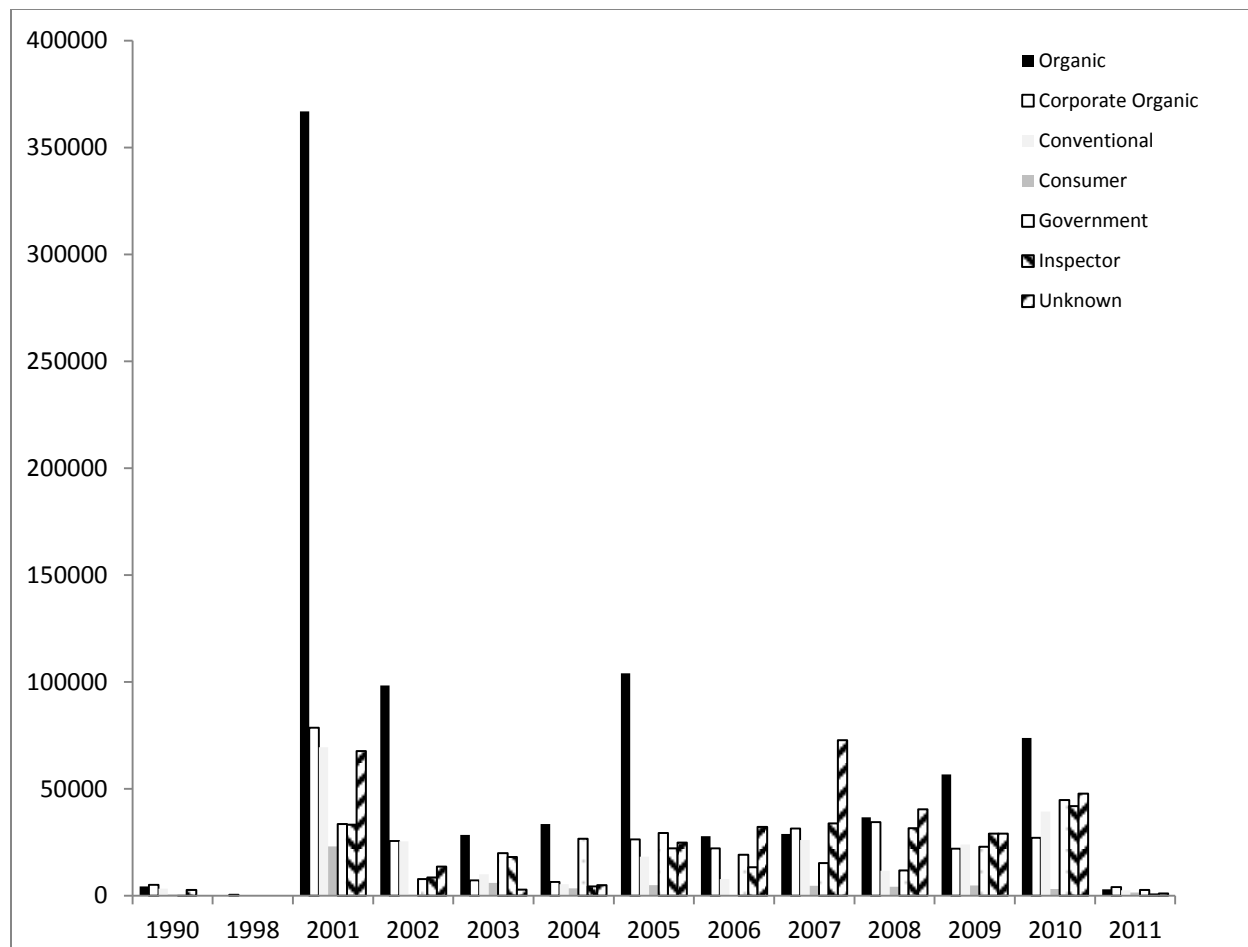


Figure 20. Word Counts by Actor Type: Organizations

In later years, the organic movement still contributed a significant portion of the debate, but the distribution became more equal.

We then sought to determine the likelihood of each type of actor to employ legitimating accounts. For each actor type, we divided the number of legitimating accounts words by the total number of words attributed to that actor type. A few interesting trends emerged. First, despite the organic movement’s inclination to speak, they were the least likely group to employ

legitimizing accounts. The groups most likely to employ legitimating accounts were consumers (5.4%), corporate organic (5.4%), and conventional actors (5.0%).

Next we sought to identify the rates of the types of legitimating accounts in conventional and organic actors.

Table 7

Comparison of the Percentages of Legitimizing Account Type Relative to Total Legitimizing Accounts: Organic Movement vs. Conventional

	Organic	Conventional	Difference
Pathos	28.2%	43.8%	-15.5%
Ethos	35.9%	33.3%	2.6%
Logos	35.9%	22.9%	13.0%

We divided each type of legitimating account for each actor type by the total amount of legitimating accounts for that group. For example, to calculate the likelihood the organic movement actors would use a logos legitimating account, we divided the number of logos legitimating accounts used by the organic movement (18,837) by the total number of legitimating accounts used by the organic movement (862,910).

A number of interesting patterns emerged from this analysis. As Table 7 shows, conventional food actors used moral arguments in close to half of their legitimating accounts (43.75%), whereas the organic movement actors employed this type of legitimating account less than one-third of the time (28.22%). Another interesting pattern emerging from this analysis was that, the organic movement actors tended to employ logos arguments with much greater

frequency than the conventional food actors (35.89 vs. 22.9%). Finally, both groups tended to employ ethos legitimating accounts with relatively the same frequency.

4.8.2 NOSB members vs. non-NOSB members

We also compared the use of legitimating accounts of NOSB members to non-NOSB members. As can be seen in Figure 20, non-NOSB actors tended to employ legitimating accounts more frequently than NOSB members. This trend becomes more striking when one considers the total number of words attributed to non-NOSB were 3/5ths of the total of words attributed to NOSB members (845,303 vs. 1,404,149). Overall, the breakdown of legitimating accounts is similar between the two groups, with ethos being the most common type, followed by logos and pathos.

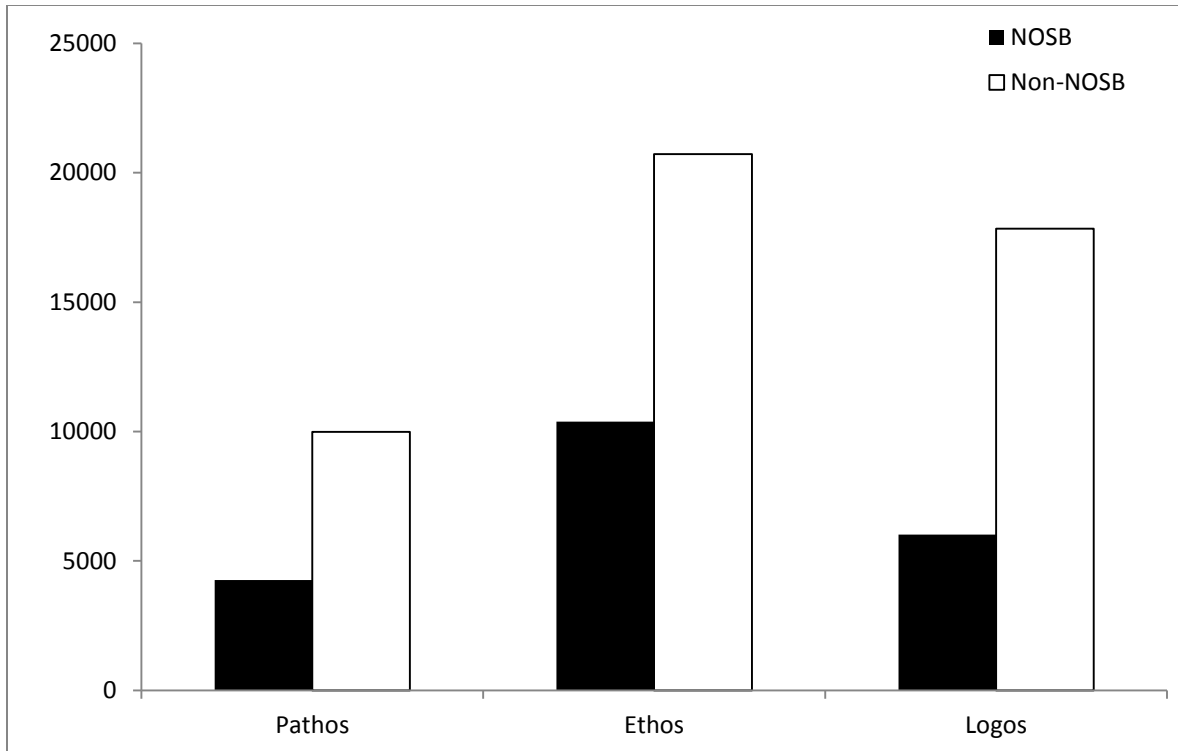


Figure 21. A Comparison of Legitimating Account Types: NOSB members vs. Non-NOSB Members

CHAPTER 5

DISCUSSION AND CONCLUSIONS

5.1 Introduction

The purpose of this study was to provide an in-depth analysis of various actors' strategies to deploy legitimating accounts within the context of the United States organic food policy formation. We traced the legitimating accounts of six different types of actors over the course of 21 years. We expected all the actors, particularly the organic movement and conventional food actors, to deploy logos legitimating accounts prior to the passage of the federal standards as both of these actors considered the establishment of federal standards to be in their best interest and this type of legitimating accounts fit with the prevailing legitimacy at that time.

Previous authors (Ingram & Ingram, 2005) argued that the process to develop federal organic standards granted a degree of legitimacy to the organic movement. This legitimacy provided the organic movement with access to the debate surrounding federal organic food standards. Until that point, agricultural policy was typically the purview of the conventional food industry and governmental officials. In this space, pragmatic considerations trumped moral or emotional appeals and as such, we expected the organic movement actors to argue for their legitimacy along pragmatic lines. Moreover, we presumed organic movement actors would suppress their moral legitimating accounts, such as the benefits to local community, in order to promote more logos points, such as their involvement in practices to protect against consumer fraud or the economic benefits of organic food.

We anticipated the conventional food actors to forward logos legitimating accounts early on as well. The ability of those actors to meet the growing consumer demand for organic goods at a lower cost could provide a substantial basis for legitimacy. Thus, we expected a

convergence of legitimating accounts of both types of actors that would parallel the convergence of interests around federal organic standards.

Once the organic standards were announced in 2001, we predicted a divergence in the legitimating accounts, as different types of actors would employ different forms of legitimating accounts. Particularly, we expected actors in the organic movement to attempt to differentiate themselves from the new corporate entrants by focusing on their pathos characteristics as the actors realized they lacked the resources to compete with the larger corporations now entering the organic industry.

We also presumed a bifurcation of organic producers' legitimating accounts that would mirror the bifurcation that occurred in the industry (Goodman, 2000). Therefore, representatives from industrial organic food, such as Cascadian Farms and Muir Organic were expected to employ logos legitimating accounts, while the organic movement farmers, who were dedicated to the philosophy of sustainability and promoted strong local ties (Goodman, 2000), would opt for pathos legitimating accounts. Furthermore we suspected the increased technical coherence of the organic food institutional field brought about by the federal standards (Gibbon, 2008) provided actors the opportunity to decouple the definition of organic from the pathos basis upon which it was founded (Meyer & Rowan, 1977). This decoupling, we felt, would provide opportunities for actors in this field to re-establish a pathos basis for legitimacy.

5.2 Interpretation of Findings

In this section we will provide an analysis of the findings of our study. We will show that some results were consistent with expectations, while others were not. We will discuss each

finding in turn, focusing first on broad trends and working our way towards more fine-grained observations.

5.2.1 Legitimizing Accounts over Time

With almost 25,000 words of LA, the 1990 Joint Hearing of Congress contained the greatest number of legitimating accounts of any source in our sample by a wide margin (see Figure 5). We expected such a result, as this hearing represented one of the first opportunities for proponents of organic agriculture to participate in the in the national agricultural policy debates. Therefore, these actors needed to establish their legitimacy in the eyes of the policy makers.

The second distinct spike in overall legitimating accounts occurred in 2007 (Figure 5). This finding was not anticipated as the organic industry was well-established at this point and in little need of legitimating accounts. In fact, the steady decline observable in all legitimating accounts suggests an increase in legitimacy. Thus, we needed to consider alternative explanations for this unexpected uptick. Once we began considered the topics of discussion in 2007, we soon understood the rise in the rate of legitimating accounts.

In March 2007 the Aquatic Animals Task Force of the National Organic Standards Board released their Final Recommendation on aquaculture production (Aquatic Animal Task Force Aquatic Working Group, 2007). The task force recommended that the production of aquatic species fall under the purview of the federal organic standards. Thus creating a new component of the organic food industry and brought new actors into the conversation. These actors initially lacked legitimacy; therefore the increase we witnessed in 2007 is attributable to the efforts of these actors to gain legitimacy.

As stated in Chapter 4, we were concerned the disproportionate size of the NOSB minutes may have been skewing our results. Therefore, we controlled for the size of each source and reran the analysis (Figure 6). This calculation further bolstered our conclusion that the legitimating accounts occurred once organic agriculture began to gain greater acceptance. This calculation highlighted the relatively low rate of legitimating accounts during the NOSB meetings. We attribute the lack of legitimating account to three factors. One, the original organic standards were first published in 1997, and thus by 2001, actors had four years of opportunity to forward their legitimating accounts. The second factor contributing to the low legitimating account rates during the NOSB meeting is the dual purpose of the NOSB meetings suppressed the opportunity for actors to forward their legitimating accounts. These meetings were not only public forums, but they were also a vehicle to review and recommend proposed materials for the National List. Public comments were but a small portion of the meeting agendas. The majority of discussion focused on material reviews; a topic not particularly conducive to forwarding legitimating accounts. The last factor concerns the familiarity of the participants with one another. The NOSB consisted of only 15 members at any given time and many of the participants in the meetings attended multiple times, thus reducing the need to argue for one's legitimacy.

Generally, the legitimating accounts became increasingly simplified over time. This indicates the move of institutional field towards cognitive legitimacy. Evidence of this trend is observable in Figure 5. There is a distinct downward trend from 1990 until 2006. In 2006, the legitimating accounts rates rise in conjunction with the introduction of the seafood standards.

Figure 12 also shows this trend occurring in the different types of legitimating accounts. As the organic food industry became institutionalized, the actors in this field no longer felt

obligated to argue for their legitimacy, whichever type it may have been. For example, Figure 12 shows that market-based legitimating accounts were by far the most common to appear in that venue. However, by 2001, the rate of market-based legitimating accounts dropped dramatically; an indication that actors no longer had to argue for their market viability; it had become assumed.

The rhetoric surrounding food safety represents another opportunity to observe this trend. In the 1990 Joint Congressional Session, legitimating accounts concerning food safety were slightly less common than appeals to pathos (Figure 12), yet they were virtually absent in future discussions. In fact, by the 2001 Listening Session, the only relevant legitimating accounts were pathos, market-based logos, and ethos.

5.2.1 Marketing Legitimizing Accounts

Market legitimating accounts were by far the most prominent type of legitimating accounts in 1990, accounting for almost half of the legitimating accounts at this time. This finding is consistent with our expected findings, as we considered market legitimacy a type of logos legitimacy. The significant drop-off in market legitimating accounts after 1990, though, was a bit unexpected. We can tentatively attribute this trend to differences in the different venues, and thus audiences. The Congressional Hearings of 1990 had perhaps the most easily-recognizable source of legitimacy – the members of Congress – and thus the legitimating accounts were the most consistent. This finding provides some credence to our assertion that legitimating accounts can serve as a tool to identify the source of legitimacy in a given context. Moreover, the diversity in legitimating accounts apparent in the remainder of our venues points to the contested nature of the institutional field at that time.

Perhaps the most unexpected finding in our analysis was the preponderance of inter-organizational LA. We did not consider this type of legitimating accounts in our initial typology and were surprised at its consistent presence in the data. In order to make sense of these findings, we went back to the legitimacy literature and found that Galaskiewicz (1991) argued that organizations garnered legitimacy by participating in activities with organizations that existed outside of their traditional networks. The following quote from a restaurateur demonstrates this concept:

We work very closely in cooperation with Blue Ocean Institute, especially, Seafood Choices Alliance, as well as Monterey Bay Aquarium, Shedd Aquarium, Charleston Aquarium, and really cross-reference a lot of these various, you know, and sometimes widely varying information systems...

Here we see the actor partnering with organizations not typically associated with most restaurants as he seeks information regarding the product he serves his customers. However, we contend the strategy outlined by Galaskiewicz (1991) may be deployed with more likely partners as well, as the following quote will show: “We do fair trade certification and we work with over 1 million small family farmers around the world...”

Actors in this study, particularly from the organic movement, frequently adopted a strength-in-numbers approach to legitimacy. Kimberly Elsbach (1994) witnessed a similar phenomenon in her analysis of the rhetoric of representatives from the California cattle industry. She argued that [inter-org] legitimacy accounts were useful as they served as a signal to the target audience that the organization possessed normative legitimacy (DiMaggio & Powell,

1983) and such accounts served as “social proof” of the organization’s rationality (Elsbach, 1994).

5.2.3 Pathos Legitimizing Accounts

An analysis of the use of pathos legitimating accounts (Figure 9) also lends credence to our assertion that the use of legitimating accounts is more pronounced when a new industry emerges. Pathos legitimating accounts peak twice, once during the initial Congressional Hearings of 1990 and then again in 2007, when the Aquatic Animals Task Force of the National Organic Standards Board released their Final Recommendation on aquaculture production. Interestingly, during the second peak, pathos legitimating accounts are the most common type. We tentatively attribute this increase to two factors. One, as we have shown in this study, the increase as a result of the announcement of new regulations. And two, perhaps actors felt the particular venue, the NOSB meetings, were particularly amenable to pathos LA. Future research may wish to compare the language in the NOSB meetings to other venues such as trade magazines or annual reports in order to determine if this pattern represents a broader trend in the institutional field at that time or is specific to the particular context.

5.2.4 Logos Legitimizing Accounts

As stated earlier, we expected logos legitimating accounts to play a prominent role in the actors’ appeal for legitimacy in our study. If one is to include market based legitimating accounts under the heading of logos legitimacy (as we do), then our expectations were correct. However, other forms of logos legitimating accounts were less common. Figure 10 shows these types of legitimating accounts generally following the overall legitimating accounts pattern.

The one deviation from this pattern occurs in 2003, when logos legitimating accounts become the most common type used by all actors. At this time we are unable to account for this spike as there was no noticeable change in the topics discussed during this time. Perhaps, further insight may occur if future researchers compare the attendance during 2003 to other years of the NOSB meetings.

5.5 Legitimizing Accounts by Source

We then analyzed the type of legitimating accounts occurring in each source (Figures 11 and 12). These results support our earlier assertion that actors were most likely to deploy many legitimating accounts during the 1990 Congressional Hearing in order to secure their initial legitimacy. Thus, with an identifiable legitimating source, actors used the type of legitimating accounts most likely to appeal to that authority.

Also of interest is the high occurrence of pathos legitimating accounts during the Comment Period of 1998. This result was expected, as the majority of the actors were anonymous consumers voicing their concern over the National Organic Program's proposal to include genetically modified organisms, irradiated foods, and sludge in the list of approved materials for organic production. A representative sample of comments during this time period follows: "I strongly believe that the proposed rule is *not compatible* or consistent with long established *organic principles* [italics in original]." Interestingly, pathos legitimating accounts were not likely to appeal to the legitimating sources at that time. Rather it seems that the groundswell of opposition to the proposed rules may have partially shifted the basis for legitimacy. Indeed, in subsequent venues, pathos legitimating accounts appear with similar frequency as market-based legitimating accounts.

5.4 Comparison of Actor Types

5.4.1 Organic Movement vs. Conventional

Next, we looked at the use of legitimating accounts by the organic movement and conventional food actors (Figure 15). Interestingly, the organic movement employed more legitimating accounts than conventional food actors. This trend was particularly pronounced in 2002, when the organic movement's legitimating accounts outpaced conventional food actors four to one (1129 to 227). Organic movement actors continued to outpace conventional food actors throughout the timeframe of our study, but the difference became much less pronounced as the study progressed. The spike in 2001, one year before the federal standards took effect, represents a final push for the organic movement actors to influence public policy.

When we break out the types of legitimating accounts used by the organic movement (Figures 16 and 17), we can see that both spikes featured upticks in pathos and pathos legitimating accounts, contrasting to the initial foray in to the national agriculture agricultural debate in 1990 when legitimating accounts were mostly market-based.

We then analyzed the conventional food actors' use of LA. We found that these actors' use of legitimating accounts also experienced a dramatic spike in 2001 (Figure 15). We attribute this to effort to influence organic policy. Additional insights emerge when we look at the types of legitimating accounts used by conventional food actors (Figures 18 and 19). The graphs are on a smaller scale than Figure 15 and thus better show the trends in the conventional food actors' legitimating accounts. Here we see the

2001 spike from the earlier graph, but a second, smaller, spike is now apparent in 2006. Interestingly, these spikes are similar to those of the organic movement and occur just prior to the release of new policies, leading us to speculate that the conventional food actors were adapting their messages to appeal to this particular audience.

These results are based on raw numbers and the organic movement actors were the most vocal in the study (Table 6). When we looked at the rate of the legitimating accounts, some interesting trends surfaced. First, we determined that while organic movement actors dominated much of the discussion in these venues, they were the least likely to use LA, comprising only 2.2% of their total speech. We feel this is attributable to their strong presence on the NOSB, where they needed to discuss topics unrelated to their legitimacy. This may also be due to the organic movement's ability to establish their legitimacy.

Conventional food actors, on the other hand, were more than twice more likely to employ legitimating accounts than the organic movement actors. Conventional food actors may have felt the NOSB meetings favored those in the organic movement and thus were motivated to provide rationale for their presence and positions.

Perhaps the most interesting result emerged when we compared the types of legitimating accounts used by conventional food and organic movement actors (Table 7). The results seem almost counterintuitive. The conventional actors employed pathos legitimating accounts 16% more often than organic movement actors. This finding lends further credibility to our assertion that conventional food actors tailored their message to what they felt would be best received in that venue. Also interesting is that organic

movement actors were 13% more likely to employ market legitimating accounts than conventional food actors. The following two quotes capture this sentiment:

I live near Muleshoe, Texas where I farm 960 acres of irrigated land growing certified organic food corn. Seven years ago, I began a transition to organic production methods not for environmental reasons, but rather for reasons driven by economics. For the past seven years, I have watched the demand for organic food expand at rates that today make it the fastest growing segment of the food industry.

I farm 960 acres of land under center pivot irrigation where the main crop is food corn, wheat for grazing cattle, and cotton all in rotation. The transition to organic was gradual. The natural fertility of the soil was restored through crop rotation and the use of materials that help to generate microorganisms, earthworms and other soil life. Weeds are minimized by crop rotation and periodic cultivation. Every other year, 10-15 tons of composted cow manure is added on the wheat land and plowed under immediately. These practices have reduced my cost of production and increased the natural productivity of the soil. As a result, I have experienced yields 120-150% of what my neighbor yields.

When one considers these findings together, it seems as if the actors are trying to over-compensate for their weaknesses. Indeed similar dynamics regarding legitimacy in general have been proposed in the past. Ashford and Gibbs (1990) reason that firms lacking legitimacy find it necessary to promote themselves as legitimate. Our study shows that this dynamic can be seen in the different types of legitimacy as well. In other words, actors who are deemed legitimate along one dimension may promote other types of legitimacy they may lack.

5.4.2 NOSB vs. non-NOSB

Finally, we looked at the difference between NOSB and non-NOSB actors. Figure 21 shows that non-NOSB members deployed legitimating accounts with much more frequency than NOSB. We attribute this trend to the fact that NOSB members must discuss topics not directly affecting them. Furthermore, board membership provides a degree of legitimacy and familiarity.

5.5 Correlations between Constructs

One interpretation of the higher than expected correlations between the various legitimating accounts (see Table 5) may be that actors craft their message to match the particular venue. As we saw in Figure 12, the 1990 Congressional Hearing not only had a high number of legitimating accounts, it was dominated by market legitimacy.

Moreover, the cluster analysis may, at times, suggest some misleading results as the similarity of an actor's phrases does not always provide an accurate representation of their meaning. Actors can employ similar language to convey divergent messages. Just as likely is the possibility of the appearance of more than one type of legitimating accounts in the same discussion. This trend was particularly notable when the seemingly-opposing legitimating accounts, pathos and market based legitimacies, appeared together. A few examples of this follow: "[Company Name] natural organic brands we hold the leadership position in the marketplace, but also in the effort to convert food produced in sustainable farming practices through our Well Earth sustainable sourcing program." And, "Our overriding goal is to promote organic integrity from the field to the marketplace." Finally:

I'm with [Name] Egg Farms, and we've been producing certified organic eggs in [state]

since January of 1997. Our management process begins with day-old chicks. Currently we have five organic laying houses that average around 10,000 birds per barn and three organic pullet houses that we're using to grow those layers. They're located in various points in [state], and we're certified currently with Pennsylvania Certified Organic and NOFA New York. Each of our farms that we work with is owned and operated by individual families that on a daily basis take care of the needs of the laying hens and the pullets.

Thus the correlation between the constructs does not always portray an accurate representation of the similarities between the legitimating accounts. As we have shown, further analysis is required to discern the differences in the message.

5.6 Conclusions

All of these observations may be an indication of the difficulty of the organic food institutional field to define meanings in a shifting landscape. “I guess my concern is that someone who has the credibility, such as Pennsylvania, as [name] pointed out, if you can't define organic food, how can we do it? We don't have any credibility.”

However, from these findings we can make a number of broader conclusions. First, legitimating accounts tend to rise when an industry enters into national debate, members of that industry attempt to establish their credibility. This supports Meyer and Rowan's (1977) finding on a macro scale as firms seek to establish legitimacy early.

Second, actors will begin their legitimating accounts with those types of legitimating accounts that they anticipate will be well-received. Then, if legitimacy is secured, they will fall back upon their strengths. Established actors may attempt to co-opt the other's bases for legitimacy.

Finally, we began with the idea that legitimating accounts can identify sources of legitimacy. Based on our findings, we can conclude that the NOSB seems to bestow legitimacy based upon the pathos qualities of an actor, whereas logos legitimating accounts were better received in the 1990 Congressional Hearing.

Our study contributes to the legitimating literature by demonstrating the usefulness of legitimating accounts to identify the relevant legitimacy sources in a given context. We also extend the work of Ashford and Gibbs (1990) by showing that actors may have one type of legitimacy, but will protest if they are low in other types.

5.7 Limitations

"The word approved there may have a different meaning" - National Organic Program representative

The most significant limitation is that our study does not contain data from 1991 to 1997 and 1999 to 2000. Unfortunately, the USDA did not keep transcripts of the NOSB meetings during those times. However, if the NOSB transcripts were available, we would expect to see an uptick in overall legitimating accounts in 1997, just prior to the release of the first proposed organic rules, which would be consistent with the data we were able to access.

There are a number of conceptual and theoretical limitations to our study. As alluded to in the opening quote, there is no definitive representation of reality due to the multiplicity of meanings present in discourse (Deetz, 1996). While this type of research is inherently subjective, we attempted to mitigate this subjectivity through the use of various quantitative methods and the use of two coders. Also, due to the nature of the methodology, we were unable to discern the genuine nature of the actors' messages.

One methodological issue with this study was that the program used to analyze the data was unable to generate confidence intervals or p-values for the Pearson coefficients in the cluster analysis. Therefore, we were unable to determine the significance of the stated correlations.

5.8 Future Research

Because of the significant presence of ethos legitimating accounts in this study, future research may benefit from a closer analysis of the patterns identified by the actors to give them legitimacy. Findings from a study conducted by Nelson Phillips and associates (2000) concerning inter-organizational collaboration may provide initial direction in this endeavor. Phillips et al. (2000) define inter-organizational collaboration as an arrangement between two or more organizations that falls outside of the purview of both market mechanisms and hierarchies. Collaboration plays an important role in the structuration of institutional fields, serving as a *négociant* between the formation of the rules associated with an institutional field and their reproduction. Moreover, these authors emphasize the importance of context when exploring the dynamics of collaboration. We feel the context of the current study provides a rich background to assist researchers in furthering the understanding of the importance of collaboration in

institutional fields. Researchers may apply the concepts of Phillips et al. (2000) to an analysis of the enactments of the USDA standards at various certifying firms.

Another potentially interesting extension of the current research can draw upon the findings of Zbaracki (1998). In his analysis of TQM practices, he found that the TQM experts shaped the TQM programs in their organization through their own particular knowledge and rhetoric surrounding its implementation. If the enactment of USDA standards follows the pattern in the European Union as identified by Gibbon (2008), we would expect an initial divergence of the technical elements as individual firms would enact regulations in slightly different ways. If a similar dynamic were at play, we would expect a technical convergence to be preceded by efforts to clarify the regulations. Such a pattern would also be consistent with Giroux's (2006) assertion that popular management trends become vaguer as they gain in popularity.

Future research may uncover similar patterns in the enactment of USDA organic standards. If so, it represents a full-circle for organic standards, which started with local interpretations of the concept and then evolved into a standardized federal mandate. Also may be indicative of the dialectic between normative control and rational control (Barley & Kunda, 1992).

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APPENDICES

Appendix A – List of Actor Codes

Walter	Jones	1990	0	5	2
George	Brown	1990	0	5	2
Glenn	English	1990	0	5	2
Leon	Panetta	1990	0	5	2
Jerry	Huckaby	1990	0	5	2
Dan	Glickman	1990	0	5	2
Charles	Stenholm	1990	0	5	2
Harold	Volkmer	1990	0	5	2
Charles	Hatcher	1990	0	5	2
Robin	Tallon	1990	0	5	2
Charles	Staggers	1990	0	5	2
Jim	Olin	1990	0	5	2
Timothy	Penny	1990	0	5	2
Richard	Stallings	1990	0	5	2
David	Nagle	1990	0	5	2
Jim	Jontz	1990	0	5	2
Jim	Johnson	1990	0	5	2
Claude	Harris	1990	0	5	2
Ben	Nighthorse Campbell	1990	0	5	2
Mike	Espy	1990	0	5	2
Bill	Sarpalius	1990	0	5	2
Will	Long	1990	0	5	2
Gary	Condit	1990	0	5	2
Roy	Dyson	1990	0	5	2
Martin	Lancaster	1990	0	5	2
Edward	Madigan	1990	0	5	2
Thomas	Coleman	1990	0	5	2
Ron	Marlenee	1990	0	5	2
Larry	Hopkins	1990	0	5	2
Arlan	Stangeland	1990	0	5	2
Pat	Roberts	1990	0	5	2
Bill	Emerson	1990	0	5	2
Sid	Morrison	1990	0	5	2
Steve	Gunderson	1990	0	5	2
Tom	Lewis	1990	0	5	2
Robert	Smith	1990	0	5	2
Larry	Combest	1990	0	5	2
Bill	Schuette	1990	0	5	2
Fred	Grandy	1990	0	5	2
Wally	Herger	1990	0	5	2

Clyde	Holloway	1990	0	5	2
James	Walsh	1990	0	5	2
Bill	Grant	1990	0	5	2
Charles	Rose	1990	0	5	2
Kika	de la Garza	1990	0	5	2
Roger	Blobaum	1990	0	1	4
Mel	Coleman	1990	0	2	1
Lynn	Coody	1990	0	6	2
Crawford	Jim	1990	0	1	1
Stephen	George	1990	0	3	1
Ellen	Haas	1990	0	4	1
Daniel	Haley	1990	0	5	2
Deborah	Hammel	1990	0	6	1
Fredrick	Kirschenmann	1990	3	1	1
Patti	LaBoyteaux	1990	0	1	3
Russell	Notar	1990	0	1	1
Mark	Retzloff	1990	0	1	1
Edward	Sills	1990	0	1	1
Jim	Wiers	1990	0	3	3
Terry	Witt	1990	0	1	1
PETA		1990	0	4	2
Dale	Cochran	1990	0	5	1
Dept Health and Human Services		1990	0	5	2
Boyd	Foster	1990	0	2	1
Tommy	Irvin	1990	0	5	1
Ron	Tammen	1990	0	1	1
David	Vetter	1990	0	1	1

CAROLYN	BRICKEY	6/6/01	1	3	2
TONI	STROTHER	6/6/01	0	4	2
WILLIAM	WELSH	6/6/01	1	1	1
GEORGE	SIEMON	6/6/01	1	1	1
ROSALIE	KOENIG	6/6/01	1	0	1
MARK	KING	6/6/01	1	6	2
STEVEN	HARPER	6/6/01	1	1	1
REBECCA	GOLDBURG	6/6/01	1	3	2
JAMES	RIDDLE	6/6/01	1	0	2
ERIC	SIDEMAN	6/6/01	1	0	2
RICHARD	MATHEWS	6/6/01	0	4	2
GOLDIE	CAUGHLAN	6/6/01	1	0	2
DAVID	CARTER	6/6/01	1	0	1
KIM	BURTON	6/6/01	1	2	3

OWUSU	BANDELE	6/6/01	1	0	2
Harriet	Behar	6/6/01	0	5	2
Randy	Duranceau	6/6/01	0	1	2
ROBERT	SCHWARTZ	6/6/01	0	2	2
MR. Dick	Krengle	6/6/01	0	1	1
MS. Julia	Bibner	6/6/01	0	2	3
MR. Greg	Herbruck	6/6/01	0	1	1
MR. Morris	Preston	6/6/01	0	2	3
MS. Sharon	Krumwiede	6/6/01	0	1	2
MR. Kelly	Morrhead	6/6/01	0	2	3
MR. Jim	Pierce	6/6/01	0	1	3
MR. Tim	Griffin	6/6/01	0	1	3
MR. Fred	Ehlert	6/6/01	0	5	3
MS.					
Kathleen	Downey	6/6/01	0	5	1
MS. Zea	Sonnabend	6/6/01	3	5	2
MR. Richard	Holliday	6/6/01	0	1	3
MR. Tom	Hutchinson	6/6/01	0	1	3
MR. Ron	O'Bara	6/6/01	0	2	3
MR. Edward	Brown	6/6/01	0	1	1
MR. MAURY	WILLS	6/6/01	1	4	1
MS. Lynn	Cody	6/6/01	0	0	3
MR. Michael	Sligh	6/6/01	2	0	3
MR. John	Clark	6/6/01	0	0	3
MS. Merrill	Clark	6/6/01	2	1	1
MR. Bob	Anderson	6/6/01	2	1	2
MR. Phil	LaRocca	6/6/01	0	0	1
MS. Sissy	Bowman	6/6/01	0	0	1
MS. Pam	Saunders	6/6/01	0	1	0
MR. Mark	Ritchey	6/6/01	0	2	1
MS. Faye	Jones	6/6/01	0	0	1
MR. Willie	Lockeretz	6/6/01	1	6	1
Margaret	Wittenberg	6/6/01	2	1	1
CAROLYN	BRICKEY	10/16/01	1	3	2
DAVID	CARTER	10/16/01	1	6	3
KIM	M. BURTON	10/16/01	1	2	3
OWUSU	A. BANDELE	10/16/01	1	6	3
GOLDIE	CAUGHLIN	10/16/01	1	1	2
REBECCA	J. GOLDBURG	10/16/01	1	0	3
JAMES	RIDDLE	10/16/01	1	6	2
ERIC	SIDEMAN	10/16/01	1	0	2
RICHARD	H. MATHEWS	10/16/01	0	6	3
STEVE	HARPER	10/16/01	0	1	1

MARK	KING	10/16/01	0	0	0
ROSALIE	KOENIG	10/16/01	0	0	1
WILLIAM	LOCKERETZ	10/16/01	0	0	2
BOB	ANDERSON	10/16/01	2	1	2
GEORGE	SIEMON	10/16/01	1	1	1
Emily Brant	Reagan	10/17/01	0	6	2
CAROLYN	BRICKEY	10/17/01	1	3	2
RICHARD	MATHEWS	10/17/01	0	4	1
OWUSU	BANDELE	10/17/01	1	0	2
KIM	BURTON	10/17/01	1	2	3
DAVID	CARTER	10/17/01	1	0	1
GOLDIE	CAUGHLIN	10/17/01	1	0	2
REBECCA	GOLDBURG	10/17/01	1	3	2
STEVEN	HARPER	10/17/01	1	1	1
MARVIN	HOLLEN	10/17/01	1	0	1
MARK	KING	10/17/01	1	0	0
ROSALIE	KOENIG	10/17/01	1	0	1
WILLIAM	Lockeretz	10/17/01	1	0	2
JAMES	RIDDLE	10/17/01	1	0	2
ERIC	SIDEMAN	10/17/01	1	0	2
GEORGE	SIEMON	10/17/01	1	1	1
WILLIAM	WELSH	10/17/01	1	1	1
KATHERINE	BENHAM	10/17/01	1	4	2
THOMAS	HARDING	10/17/01	0	1	0
Jim	Pierce	10/17/01	0	5	2
Kelly	Shea	10/17/01	0	1	1
David	Engel	10/17/01	0	5	1
Tom	Hutchinson	10/17/01	0	1	3
Bill	Wolf	10/17/01	0	0	1
Sissy	Bowman	10/17/01	0	0	1
David	Wicker	10/17/01	0	1	2
Brian	Baker	10/17/01	0	5	1
DAVID	CARTER	5/6/02	1	0	1
OWUSU	A. BANDELE	5/6/02	1	0	2
KIM	M. BURTON	5/6/02	1	2	3
GOLDIE	CAUGHLAN	5/6/02	1	0	2
ANN	L. COOPER	5/6/02	1	0	1
DENNIS	L. HOLBROOK	5/6/02	1	0	1
T. MARK	KING	5/6/02	1	6	2
MICHAEL	P. LACY	5/6/02	1	2	3
WILLIAM	LOCKERETZ	5/6/02	1	6	1
KEVIN	R. O'RELL	5/6/02	1	1	1
NANCY	M. OSTIGUY	5/6/02	1	0	2

JAMES	RIDDLE	5/6/02	1	0	2
GEORGE	L. SIEMON	5/6/02	1	1	1
KATHERINE	BENHAM	5/6/02	0	4	2
KEITH	JONES	5/6/02	0	4	1
RICHARD	MATHEWS	5/6/02	0	4	1
BARBARA	ROBINSON	5/6/02	0	4	1
Jeff	Huckaby	5/6/02	0	1	2
Gerald	Davis	5/6/02	0	1	2
Leslie	Zoick	5/6/02	0	5	1
Floyd	Meeker	5/6/02	0	2	1
Jerry	Wolf	5/6/02	0	0	1
Matt	Messa	5/6/02	0	5	1
Morris	Preston	5/6/02	0	2	3
Chuck	Wolf	5/6/02	0	0	1
Gary	Zimmer	5/6/02	0	0	1
Liana	Hoodes	5/6/02	0	0	1
George	Bass	5/6/02	0	0	1
Chris	Pierce	5/6/02	0	1	1
Steven	Gray	5/6/02	0	2	2
Steve	Collier	5/6/02	0	4	2
Wende	Elliott	5/6/02	0	1	1
Randy	Duranceau	5/6/02	0	1	2
Judy	Goodman	5/6/02	0	0	3
Robert	Hadad	5/6/02	0	3	1
Urvashi	Rangan	5/6/02	0	3	1
Sam	Welsch	5/6/02	0	5	1
Emily	Brown Rosen	5/6/02	0	5	2
David	Engel	5/6/02	0	5	1
Zea	Sonnabend	5/6/02	3	5	2
David	Wicker	5/6/02	0	1	2
Leslie	McKinnon	5/6/02	0	5	1
Gail	Faries	5/6/02	0	0	1
Kelly	Moorhead	5/6/02	0	1	2
Amha	Belay	5/6/02	0	6	1
Lynn	Coody	5/6/02	0	0	3
Emily	Brown Rosen	5/6/02	0	5	1
Brian	Leahy	5/6/02	0	5	1
Phil	La Rocca	5/6/02	0	0	2
Marty	Mesh	5/6/02	0	5	1
Steve	Harper	5/6/02	2	1	1
Oscar	Morales	5/6/02	0	2	1
Tom	Jones	5/6/02	0	2	1
Sharon	Krumwedl	5/6/02	0	1	2

Sissy	Bowman	5/6/02	0	5	1
Eric	Sideman	5/6/02	1	0	2
Kevin	Brussyll	5/6/02	0	0	1
DAVID	CARTER	5/7/02	1	0	1
OWUSU	A. BANDELE	5/7/02	1	0	2
KIM	M. BURTON	5/7/02	1	2	3
GOLDIE	CAUGHLAN	5/7/02	1	0	2
ANN	L. COOPER	5/7/02	1	0	1
DENNIS	L. HOLBROOK	5/7/02	1	0	1
T. MARK	KING	5/7/02	1	6	2
MICHAEL	P. LACY	5/7/02	1	2	3
WILLIAM	LOCKERETZ	5/7/02	1	6	1
KEVIN	R. O'RELL	5/7/02	1	1	1
NANCY	M. OSTIGUY	5/7/02	1	0	2
JAMES	RIDDLE	5/7/02	1	0	2
GEORGE	L. SIEMON	5/7/02	1	1	1
KATHERINE	BENHAM	5/7/02	0	4	2
KEITH	JONES	5/7/02	0	4	1
RICHARD	MATHEWS	5/7/02	0	4	1
BARBARA	ROBINSON	5/7/02	0	4	1
TONI	STROTHER	5/7/02	0	4	2
DAVID	CARTER	5/8/02	1	0	1
OWUSU	A. BANDELE	5/8/02	1	0	2
KIM	M. BURTON	5/8/02	1	2	3
GOLDIE	CAUGHLAN	5/8/02	1	0	2
ANN	L. COOPER	5/8/02	1	0	1
DENNIS	L. HOLBROOK	5/8/02	1	0	1
T. MARK	KING	5/8/02	1	6	2
MICHAEL	P. LACY	5/8/02	1	2	3
WILLIAM	LOCKERETZ	5/8/02	1	6	1
KEVIN	R. O'RELL	5/8/02	1	1	1
NANCY	M. OSTIGUY	5/8/02	1	0	2
JAMES	RIDDLE	5/8/02	1	0	2
GEORGE	L. SIEMON	5/8/02	1	1	1
KATHERINE	BENHAM	5/8/02	0	4	2
KEITH	JONES	5/8/02	0	4	1
RICHARD	MATHEWS	5/8/02	0	4	1
BARBARA	ROBINSON	5/8/02	0	4	1
TONI	STROTHER	5/8/02	0	4	2
BOB	POOLER	5/8/02	0	4	2
Carolyn	Brickey	5/8/02	2	3	2
Randy	Duranceau	5/8/02	0	1	2
Tina	Ellor	5/8/02	3	4	2

Zea	Sonnabend	5/8/02	3	5	2
Harriett	Behar	5/8/02	0	0	2
Arthur	Harvey	5/8/02	0	1	1
Susan	Ulery	5/8/02	0	1	2
Emily	Brown Rosen	5/8/02	0	5	2
Mary	Mulray	5/8/02	0	5	1
Marian	Casazza	5/8/02	0	5	1
Leslie	Zuck	5/8/02	0	5	1
Marty	Mesh	5/8/02	0	5	1
Liana	Hoodes	5/8/02	0	0	1
Brian	McElroy	5/8/02	0	5	1
OWUSU	BANDELE	9/17/02	1	6	3
KIM	BURTON	9/17/02	1	2	3
DAVE	CARTER	9/17/02	1	6	3
GOLDIE	CAUGHLAN	9/17/02	1	1	2
ANN	COOPER	9/17/02	1	0	1
DENNIS	HOLBROOK	9/17/02	1	0	1
MARK	KING	9/17/02	1	0	0
ROSALIE	KOENIG	9/17/02	1	0	1
MICHAEL	LACY	9/17/02	1	2	2
RICHARD	MATHEWS	9/17/02	0	4	1
Kevin	O'RELL	9/17/02	1	1	1
NANCY	OSTIGUY	9/17/02	1	0	2
JIM	RIDDLE	9/17/02	1	0	2
BARBARA	ROBINSON	9/17/02	0	4	1
GEORGE	SIEMON	9/17/02	1	1	1
Gerald	Davis	9/17/02	1	1	2
Jeff	Huckaby	9/17/02	0	1	2
RICHARD	SEGAL	9/17/02	0	2	3
JIM	PIERCE	9/17/02	0	5	2
ANDREA	CAROWE	9/17/02	3	6	1
Eric	KINDBERG	9/17/02	0	0	1
Kelly	SHEA	9/17/02	0	1	1
SUKH	BASSI	9/17/02	0	2	1
Tom	HARDING	9/17/02	0	1	0
LESLIE	ZUCK	9/17/02	0	5	1
HUE	KARREMAN	9/17/02	3	0	1
Lynn	COODY	9/17/02	0	0	3
JOE	SMILLIE	9/17/02	3	5	1
LIANA	Hoodes	9/17/02	0	0	1
DAN	LIETERMAN	9/17/02	0	2	1
DAVE	ENGEL	9/17/02	0	5	1
EMILY	Brown Rosen	9/17/02	0	5	2

ZEA	Sonnabend	9/17/02	3	5	2
AHMA	BELAY	9/17/02	0	6	1
Kelly	MOOREHEAD	9/17/02	0	1	2
MARTY	MESH	9/17/02	0	5	1
KEITH	JONES	9/17/02	0	4	1
OWUSU	BANDELE	9/18/02	1	6	3
KIM	BURTON	9/18/02	1	2	3
DAVE	CARTER	9/18/02	1	6	3
GOLDIE	CAUGHLAN	9/18/02	1	1	2
ANN	COOPER	9/18/02	1	0	1
DENNIS	HOLBROOK	9/18/02	1	0	1
MARK	KING	9/18/02	1	0	0
ROSALIE	KOENIG	9/18/02	1	0	1
MICHAEL	LACY	9/18/02	1	2	2
RICHARD	MATHEWS	9/18/02	0	4	1
Kevin	O'RELL	9/18/02	1	1	1
NANCY	OSTIGUY	9/18/02	1	0	2
JIM	RIDDLE	9/18/02	1	0	2
BARBARA	ROBINSON	9/18/02	0	4	1
GEORGE	SIEMON	9/18/02	1	1	1
OWUSU	BANDELE	9/19/02	1	6	3
KIM	BURTON	9/19/02	1	2	3
DAVE	CARTER	9/19/02	1	6	3
GOLDIE	CAUGHLAN	9/19/02	1	1	2
ANN	COOPER	9/19/02	1	0	1
DENNIS	HOLBROOK	9/19/02	1	0	1
MARK	KING	9/19/02	1	0	0
ROSALIE	KOENIG	9/19/02	1	0	1
MICHAEL	LACY	9/19/02	1	2	2
RICHARD	MATHEWS	9/19/02	0	4	1
Kevin	O'RELL	9/19/02	1	1	1
NANCY	OSTIGUY	9/19/02	1	0	2
JIM	RIDDLE	9/19/02	1	0	2
BARBARA	ROBINSON	9/19/02	0	4	1
GEORGE	SIEMON	9/19/02	1	1	1
Tom	HARDING	9/19/02	0	1	0
DAN	LEITERMAN	9/19/02	0	2	1
MARTY	MESH	9/19/02	0	5	1
BOB	BUELLER	9/19/02	0	4	2
LESLIE	Zuck	9/19/02	0	5	1
Sissy	BOWMAN	9/19/02	0	5	1
DAVID	CARTER	10/19/02	1	0	1
KIM	BURTON	10/19/02	1	2	3

MARK	KING	10/19/02	1	0	0
OWUSU	BANDELE	10/19/02	1	0	2
JIM	RIDDLE	10/19/02	1	0	2
GEORGE	SIEMON	10/19/02	1	1	1
REBECCA	GOLDBURG	10/19/02	1	3	2
MICHAEL	LACY	10/19/02	1	2	2
Kevin	O'RELL	10/19/02	1	1	1
GOLDIE	CAUGHLAN	10/19/02	1	0	2
BARBARA	ROBINSON	10/19/02	0	4	1
RICHARD	MATHEWS	10/19/02	0	4	1
DENNIS	HOLBROOK	10/19/02	1	0	1
ANN	COOPER	10/19/02	1	0	1
ROSALIE	KOENIG	10/19/02	1	0	1
NANCY	OSTIGUY	10/19/02	1	0	2
THOMAS	HARDING	10/19/02	0	1	0
KEN	CHAMBERS	10/19/02	0	2	2
GRACE	MARROQUIN	10/19/02	0	6	1
JIM	PIERCE	10/19/02	0	5	2
DAN	LEITERMAN	10/19/02	0	2	1
BILL	DENEVAN	10/19/02	0	5	2
JIM	CRANNEY	10/19/02	0	6	2
DAVID	ENGEL	10/19/02	0	5	1
EMILY	BROWNROSEN	10/19/02	0	5	2
MARTY	MESH	10/19/02	0	5	1
MARK	KEATING	10/19/02	0	0	1
MARK	ITZKOFF	10/19/02	0	2	3
PETE	GONZALEZ	10/19/02	0	5	2
ANDREA	CAROE	10/19/02	3	6	1
RICHARD	SIEGEL	10/19/02	0	2	3
Kelly	SHEA	10/19/02	0	1	1
URUASHI	RANGAN	10/19/02	0	3	1
KATHERINE	BENHAM	10/19/02	0	4	2
BOB	POOLER	10/20/02	0	4	2
DAVID	CARTER	10/20/02	1	0	1
KIM	BURTON	10/20/02	1	2	3
MARK	KING	10/20/02	1	0	0
OWUSU	BANDELE	10/20/02	1	0	2
JIM	RIDDLE	10/20/02	1	0	2
GEORGE	SIEMON	10/20/02	1	1	1
REBECCA	GOLDBURG	10/20/02	1	3	2
MICHAEL	LACY	10/20/02	1	2	2
Kevin	O'RELL	10/20/02	1	1	1
GOLDIE	CAUGHLAN	10/20/02	1	0	2

BARBARA	ROBINSON	10/20/02	0	4	1
DENNIS	HOLBROOK	10/20/02	1	0	1
GEORGE	SIEMON	10/20/02	1	1	1
ANN	COOPER	10/20/02	1	0	1
ROSALIE	KOENIG	10/20/02	1	0	1
NANCY	OSTIGUY	10/20/02	1	0	2
GRACE	MARROQUIN	10/20/02	0	6	1
MARK	ITZKOFF	10/20/02	0	2	3
DIANE	Goodman	10/20/02	0	0	3
JANNING	KENNEDY	10/20/02	0	5	1
JACK	JENKINS	10/20/02	0	2	1
DAN	LEITERMAN	10/20/02	0	2	1
URUASHI	RANGAN	10/20/02	0	3	1
TINA	ELLOR	10/20/02	3	4	2
THOMAS	HARDING	10/20/02	0	1	0
Kelly	SHEA	10/20/02	0	1	1
EMILY	Brown Rosen	10/20/02	0	5	2
BILL	DENEVAN	10/20/02	0	5	2
JIM	PIERCE	10/20/02	0	5	2
DAVE	ENGEL	10/20/02	0	5	1
Chris	TOMPKINS	10/20/02	0	6	3
MARTY	MESH	10/20/02	0	5	1
RICHARD	SIEGEL	10/20/02	0	2	3
KATHERINE	DIMATTO	10/20/02	0	4	2
JIM	CRANNEY	10/20/02	0	6	2
BOB	POOLER	10/20/02	0	4	2
Tom	HUTCHESON	10/20/02	0	2	1
Robert	TORLA	10/20/02	0	4	2
MARK	KEATING	10/20/02	0	4	2
PETE	GONZALEZ	10/20/02	0	5	2
ANDREA	CAROE	10/20/02	3	6	1
Dennis	Holbrook	5/13/2003	1	0	1
Nancy	Ostiguy	5/13/2003	1	0	2
Rose	Koenig	5/13/2003	1	0	1
Owusu	Bandele	5/13/2003	1	0	2
Andrea	Caroe	5/13/2003	1	6	1
Goldie	Caughlan	5/13/2003	1	0	2
Mark	King	5/13/2003	1	0	0
Dave	Carter	5/13/2003	1	0	1
Jim	Riddle	5/13/2003	1	0	2
Kim	Burton	5/13/2003	1	2	3
Kevin	O'Rell	5/13/2003	1	1	1
Becky	Goldburg	5/13/2003	1	3	2

Ann	Cooper	5/13/2003	1	0	1
Mike	Lacy	5/13/2003	1	2	2
George	Siemon	5/13/2003	1	1	1
Ronnie	Cummins	5/13/2003	0	1	1
George	Kipper	5/13/2003	0	3	2
Laura	Morrison	5/13/2003	0	5	1
Brian	BAKER	5/13/2003	0	0	1
Emily	Brown	5/13/2003	0	5	2
Tom	Harding	5/13/2003	0	1	0
John	Imaraju	5/13/2003	0	3	2
Zia	Sonnebend	5/13/2003	3	5	2
Candace	Boran	5/13/2003	0	3	1
Ervashi	Rangan	5/13/2003	0	3	1
Leona	Hoods	5/13/2003	0	0	1
Beth	Sears	5/13/2003	0	2	2
Tom	Hutchison	5/13/2003	0	2	1
Mark	Devan	5/13/2003	0	2	2
Dave	Hiltz	5/13/2003	0	2	1
Leslie	Zook	5/13/2003	0	5	1
Penny	Sandoval	5/13/2003	0	2	3
David	Ingle	5/13/2003	0	5	2
Marty	Mesh	5/13/2003	0	5	1
Urvashi	RANGAN	5/13/2003	0	3	1
Kim	Burton	5/13/2003	1	2	3
Jim	Riddle	5/13/2003	1	0	2
Barbara	Robinson	5/13/2003	0	4	1
Richard	Matthews	5/13/2003	0	4	1
Jim	Pierce	5/13/2003	0	1	3
DAVID	CARTER	5/14/2003	2	2	3
Leona	Hood	5/14/2003	0	0	1
Toni	Better	5/14/2003	0	3	1
Karen	Ballthrup	5/14/2003	0	3	2
John	Wallingford	5/14/2003	0	2	1
	Amayu	5/14/2003	0	2	0
Tina	Eller	5/14/2003	3	4	2
Lucina	Lampella	5/14/2003	0	3	2
Ervashi	Regan	5/14/2003	0	3	1
Marva	Holt	5/14/2003	0	0	1
Harriet	Behar	5/14/2003	0	5	2
Margaret	Skoals	5/14/2003	0	5	1
Sissy	Bowman	5/14/2003	0	5	1
Leslie	Zook	5/14/2003	0	5	1
Marty	Mesh	5/14/2003	0	5	1

Joe	Hall	5/14/2003	0	1	2
Bob	Bursch	5/14/2003	0	1	1
Dex	Conway	5/14/2003	0	5	1
Marty	Mesh	5/14/2003	0	0	1
JULIE	BRUSSELDAVE	5/14/2003	0	0	1
Tom	Hutchison	5/14/2003	0	0	2
Grace	MARROQUIN	5/14/2003	0	6	1
Mac	Devin	5/14/2003	0	2	2
Barbara	Robinson	5/14/2003	0	4	2
ROSALIE	KOENING	10/22/2003	1	0	1
REBECCA	J. GOLDBERG	10/22/2003	1	3	2
Mike	Lacy	10/22/2003	1	2	2
ANN	L. COOPER	10/22/2003	1	0	1
KIM	DIETZ	10/22/2003	1	2	2
KEVIN	O'RELL	10/22/2003	1	1	1
JAMES	RIDDLE	10/22/2003	1	0	2
MARK	KING	10/22/2003	1	0	0
GEORGE	SIEMON	10/22/2003	1	1	1
GOLDIE	COUGHLAN	10/22/2003	1	0	2
OWUSU	A. BANDELE	10/22/2003	1	0	2
ANDREA	CAROE	10/22/2003	1	6	1
Richard	Matthews	10/22/2003	0	4	1
Steve	Vahn	10/22/2003	0	4	1
Vitolis	Vengris	10/22/2003	0	4	2
Dan	Lave	10/22/2003	0	2	2
Richard	Forshee	10/22/2003	0	4	2
Dave	Decou	10/22/2003	0	5	1
Richard	Theuer	10/22/2003	2	5	0
Emily	Brown-Rozen	10/22/2003	0	5	2
DAVID	E. CARTER	10/23/2003	1	0	1
MARK	KING	10/23/2003	1	0	0
JIM	RIDDLE	10/23/2003	1	0	2
KIM	M. BURTON	10/23/2003	1	2	3
OWUSU	BANDELE	10/23/2003	1	0	2
GEORGE	L. SIEMON	10/23/2003	1	1	1
ANDREA	CAROE	10/23/2003	1	6	1
GOLDIE	CAUGHLAN	10/23/2003	1	0	2
REBECCA J.	GOLDBURG	10/23/2003	1	3	2
DENNIS	HOLBROOK	10/23/2003	1	0	1
NANCY	OSTIGUY	10/23/2003	1	0	2
ROSALIE	L. KOENIG	10/23/2003	1	0	1
MICHAEL	LACY	10/23/2003	1	2	2
KEVIN	O'RELL	10/23/2003	1	1	1

Jim	Pierce	10/23/2003	0	5	2
Mac	Devin	10/23/2003	0	2	2
Tom	Hutcheson	10/23/2003	0	1	2
Mark	Condon	10/23/2003	0	2	1
Liana	Hoodes	10/23/2003	0	0	1
Emily	Brown Rosen	10/23/2003	0	5	2
Dave	DeCou	10/23/2003	0	5	1
Hubert	Karreman	10/23/2003	0	0	1
Urvashi	Rangan	10/23/2003	0	3	1
Dan	Leiterman	10/23/2003	0	2	1
Brian	Leahy	10/23/2003	0	5	1
Marty	Mesh	10/23/2003	0	5	1
Michael	Sligh	10/23/2003	2	0	1
Rachel	Jamison	10/23/2003	0	4	3
David	Engle	10/23/2003	0	5	1
Robert	Hadad	10/23/2003	0	3	1
Christopher	Ely	10/23/2003	0	1	1
GOLDIE	CAUGHLAN	10/23/2003	1	0	2
Lynne	Cody	10/23/2003	0	0	3
MARK	KING	4/28/2004	1	0	0
REBECCA J.	GOLDBURG	4/28/2004	1	3	2
MICHAEL P.	LACY	4/28/2004	1	2	2
GOLDIE	CAUGHLAN	4/28/2004	1	0	2
KEVIN	O'RELL	4/28/2004	1	1	1
NANCY	M. OSTIGUY	4/28/2004	1	0	2
KIM M.	DIETZ	4/28/2004	1	2	2
JAMES	RIDDLE	4/28/2004	1	0	2
DAVID	CARTER	4/28/2004	1	0	1
GEORGE	SIEMON	4/28/2004	1	1	1
ANDREA	CAROE	4/28/2004	1	6	1
ROSALIE	KOENIG	4/28/2004	1	0	1
ANN	L. COOPER	4/28/2004	1	0	1
John	Clark	4/28/2004	0	0	3
Kathy	Seus	4/28/2004	0	0	1
STEVE	HAM	4/28/2004	0	2	2
Girish	Ganjyal	4/28/2004	0	2	2
HAIM	Gunner	4/28/2004	0	1	1
Maury	Johnson	4/28/2004	0	1	2
Ray	Boughton	4/28/2004	0	6	1
Nenad	Filajdic	4/28/2004	0	1	2
Zea	Sonnabend	4/28/2004	3	5	2
David	Engel	4/28/2004	0	5	2
Leslie	Zuck	4/28/2004	0	5	1

Urvashi	Rangan	4/28/2004	0	3	1
REBECCA J.	GOLDBURG	4/29/2004	1	3	2
MICHAEL P.	LACY	4/29/2004	1	2	2
GOLDIE	CAUGHLAN	4/29/2004	1	0	2
KEVIN	O'RELL	4/29/2004	1	1	1
NANCY	M. OSTIGUY	4/29/2004	1	0	2
KIM M.	DIETZ	4/29/2004	1	2	2
JAMES	RIDDLE	4/29/2004	1	0	2
DAVID	CARTER	4/29/2004	1	0	1
GEORGE	SIEMON	4/29/2004	1	1	1
ANDREA	CAROE	4/29/2004	1	6	1
ROSALIE	KOENIG	4/29/2004	1	0	1
ANN	L. COOPER	4/29/2004	1	0	1
REBECCA	J. GOLDBURG	4/30/2004	1	3	2
MICHAEL	P. LACY	4/30/2004	1	2	2
GOLDIE	CAUGHLAN	4/30/2004	1	0	2
KEVIN	O'RELL	4/30/2004	1	0	2
NANCY	M. OSTIGUY	4/30/2004	1	0	2
KIM M.	DIETZ	4/30/2004	1	2	2
JAMES	RIDDLE	4/30/2004	1	0	2
DAVID	CARTER	4/30/2004	1	0	1
GEORGE	SIEMON	4/30/2004	1	1	1
ANDREA	CAROE	4/30/2004	1	6	1
ROSALIE	KOENIG	4/30/2004	1	0	1
ANN	L. COOPER	4/30/2004	1	0	1
Mark	Kastell	4/30/2004	0	4	2
Kelly	Casper	4/30/2004	0	0	3
Alice	Rules	4/30/2004	0	0	3
Liana	Hoodes	4/30/2004	0	1	1
John	Bill	4/30/2004	0	0	3
Jonathan	Landeck	4/30/2004	0	6	0
Richard	Wood	4/30/2004	0	2	3
Kathy	Seus	4/30/2004	0	0	1
Merrill	Clark	4/30/2004	2	0	1
Andrea	Caroe	2/28/2005	1	6	1
David	Carter	2/28/2005	1	6	3
Gerald	Davis	2/28/2005	1	1	2
Rigoberto	Delgado	2/28/2005	1	6	1
Bea	James	2/28/2005	1	6	1
Hubert	Karreman	2/28/2005	1	0	1
Rosalie	L. Koenig	2/28/2005	1	0	1
Michael	P. Lacy	2/28/2005	1	2	2
George	Siemon	2/28/2005	1	1	1

Julie	Weisman	2/28/2005	1	6	2
James	A. Riddle	2/28/2005	1	0	2
Kevin	O'Rell	2/28/2005	1	1	1
Goldie	Caughlan	2/28/2005	1	0	2
Kim	Dietz	2/28/2005	1	2	2
James	A. Riddle	3/1/2005	1	0	2
Kevin	O'Rell	3/1/2005	1	1	1
Goldie	Caughlan	3/1/2005	1	0	2
Andrea	Caroe	3/1/2005	1	6	1
David	Carter	3/1/2005	1	0	1
Gerald	Davis	3/1/2005	1	1	2
Rigoberto	Delgado	3/1/2005	1	6	1
Bea	James	3/1/2005	1	6	1
Hubert	Karreman	3/1/2005	1	0	1
Rose	Koenig	3/1/2005	1	0	1
Michael	P. Lacy	3/1/2005	1	2	2
Nancy	Ostiguy	3/1/2005	1	0	2
George	Siemon	3/1/2005	1	1	1
Julie	Weisman	3/1/2005	1	6	2
Nat	Bacon	3/1/2005	0	0	2
Clark	Driftmier	3/1/2005	0	1	2
Juan	Velez	3/1/2005	0	1	1
GEORGE	WRIGHT	3/1/2005	0	0	1
Robert	Hadad	3/1/2005	0	3	1
Harriet	Behar	3/1/2005	0	0	2
Mark	Kastel	3/1/2005	0	4	2
Bill	Welch	3/1/2005	2	1	1
Blake	Alexandre	3/1/2005	0	0	1
Rich	Ghilarducci	3/1/2005	0	6	1
Nancy	Gardner	3/1/2005	0	0	2
Henry	Perkins	3/1/2005	0	0	3
Roman	Stoltzfoos	3/1/2005	0	0	1
John	Stoltzfoos	3/1/2005	0	6	1
Jim	Gardner	3/1/2005	0	0	1
Urvashi	Rangan	3/1/2005	0	3	1
Richard	Mathews	3/1/2005	0	4	1
Dave	Johnson	3/1/2005	0	0	2
Kevin	Englebert	3/1/2005	3	0	1
Kathleen	Seus	3/1/2005	0	0	3
Cam	Wilson	3/1/2005	0	1	1
Adam	Eidinger	3/1/2005	0	0	1
Grace	Meriquin	3/1/2005	0	6	1
Arthur	Harvey	3/1/2005	0	1	1

Tom	Hutchison	3/1/2005	0	1	3
Jim	Pierce	3/1/2005	0	5	2
Jo Ann	Baumgartner	3/1/2005	0	0	1
Tom	Miller	3/1/2005	0	1	3
Tony	Azevedo	3/1/2005	0	1	1
Martin	Samson	3/1/2005	0	0	1
Vanessa	Bogenholm	3/1/2005	0	0	1
Diana	Kay	3/1/2005	0	0	2
James	Hahn	3/1/2005	0	0	2
Craig	Weakley	3/1/2005	2	1	1
Ed	Zimba	3/1/2005	0	0	1
Lyle	Edwards	3/1/2005	0	0	1
Jack	Lazor	3/1/2005	0	0	1
Richard	Siegel	3/1/2005	0	2	3
Leslie	Zook	3/1/2005	0	5	1
Emily	Brown-Rosen	3/1/2005	0	5	2
George	Kuepper	3/1/2005	0	3	2
Charles	Flood	3/1/2005	0	0	1
Mary	Mesh	3/1/2005	0	5	1
Neil	Blevins	3/1/2005	0	4	2
Kim	Dietz	3/1/2005	2	2	2
Chuck	Flood	3/1/2005	0	0	3
Andrea	Caroe	3/2/2005	1	6	1
David	Carter	3/2/2005	1	0	1
Gerald	Davis	3/2/2005	1	1	2
Rigoberto	Delgado	3/2/2005	1	6	1
Bea	James	3/2/2005	1	6	1
Hubert	Karreman	3/2/2005	1	0	1
Rosalie	L. Koenig	3/2/2005	1	0	1
Michael	P. Lacy	3/2/2005	1	2	2
Nancy	Ostiguy	3/2/2005	1	0	2
George	Siemon	3/2/2005	1	1	1
Julie	Weisman	3/2/2005	1	6	2
James	A. Riddle	3/2/2005	1	0	2
Mike	Norman	3/2/2005	0	2	1
Kim	Dietz	3/2/2005	2	2	2
Kevin	O'Rell	3/2/2005	1	1	1
James	A. Riddle	3/3/2005	1	0	2
Kevin	O'Rell	3/3/2005	1	1	1
Goldie	Caughlan	3/3/2005	1	0	2
Andrea	Caroe	3/3/2005	1	6	1
David	Carter	3/3/2005	1	0	1
Gerald	Davis	3/3/2005	1	1	2

Rigoberto	Delgado	3/3/2005	1	6	1
Bea	James	3/3/2005	1	6	1
Hubert	Karreman	3/3/2005	1	0	1
Rose	Koenig	3/3/2005	1	0	1
Michael	P. Lacy	3/3/2005	1	2	2
Nancy	Ostiguy	3/3/2005	1	0	2
George	Siemon	3/3/2005	1	1	1
Julie	Weisman	3/3/2005	1	6	2
BARBARA	ROBINSON	3/3/2005	1	4	1
Julia	Sabin	3/3/2005	0	2	1
Wendy	Swan	3/3/2005	1	6	3
Steve	Protanic	3/3/2005	0	2	3
Kim	Dietz	3/3/2005	2	2	2
Lynn	Coody	3/3/2005	0	0	3
Leanna	Hoods	3/3/2005	0	0	1
Mark	Kastel	3/3/2005	0	4	2
David	Engel	3/3/2005	0	5	2
Brian	Baker	3/3/2005	0	5	1
Jay	Feldman	3/3/2005	3	0	1
Joe	Dickson	3/3/2005	3	1	2
Leslie	Zook	3/3/2005	0	5	1
Cissy	Bowman	3/3/2005	0	5	1
Michael	McGuffin	3/3/2005	0	2	1
Pete	Gonzales	3/3/2005	0	5	2
Jim	Pierce	3/3/2005	0	5	2
JAMES	RIDDLE	8/15/2005	1	0	2
KEVIN	R. O'RELL	8/15/2005	1	1	1
GOLDIE	CAUGHLAN	8/15/2005	1	0	2
ANDREA	CAROE	8/15/2005	1	6	1
DAVID	CARTER	8/15/2005	1	0	1
GERALD	DAVIS	8/15/2005	1	1	2
BEA	E. JAMES	8/15/2005	1	6	1
HUBERT	J. KARREMAN	8/15/2005	1	0	1
ROSALIE	KOENIG	8/15/2005	1	0	1
MICHAEL	P. LACY	8/15/2005	1	2	2
NANCY	M. OSTIGUY	8/15/2005	1	0	2
GEORGE	SIEMON	8/15/2005	1	1	1
JULIE	S. WEISMAN	8/15/2005	1	6	2
Kelly	Shea	8/15/2005	0	1	1
Lynn	Betz	8/15/2005	0	1	1
Tom	Betz	8/15/2005	0	1	1
Mark	Kastel	8/15/2005	0	0	2
Tony	Azevedo	8/15/2005	0	0	3

Monica	Gonzalez	8/15/2005	0	2	1
JoAnne	Baumgartner	8/15/2005	0	0	1
Steve	Clarke	8/15/2005	0	1	1
Leslie	Zuck	8/15/2005	0	5	1
Kim	Dietz	8/15/2005	2	2	2
Grace	Marroquin	8/15/2005	0	6	1
John	Tedeschi	8/15/2005	0	6	1
Jackie	Greenburg	8/15/2005	0	0	3
Lysle	Edwards	8/15/2005	0	0	1
Juan	Velez	8/15/2005	0	1	1
Clark	Driftmier	8/15/2005	0	1	2
Steve	Pechacek	8/15/2005	0	0	1
James	Greenburg	8/15/2005	0	0	3
Steve	Morrison	8/15/2005	0	0	3
Ed	Zimba	8/15/2005	0	0	1
Steve	Bowen	8/15/2005	0	0	3
Brian	Baker	8/15/2005	0	5	1
Richard	Siegel	8/15/2005	0	2	3
Debra	Claire	8/15/2005	0	0	1
Joe	Dickson	8/15/2005	3	1	2
Richard	Theuer	8/15/2005	2	6	2
Kevin	Engelbert	8/15/2005	0	0	1
Henry	Perkins	8/15/2005	0	0	1
Lisa	Engelbert	8/15/2005	0	0	1
Sally	Brown	8/15/2005	0	0	1
John	Cox	8/15/2005	0	2	3
Gwendolyn	Wyard	8/15/2005	0	5	2
Nancy	K. Cook	8/15/2005	0	2	1
Urvashi	Rangan	8/15/2005	0	3	1
James	Kotcon	8/15/2005	0	6	3
Diane	Goodman	8/15/2005	0	0	3
Emily	Brown	8/15/2005	0	5	2
David	Engel	8/15/2005	0	5	1
Kathie	Arnold	8/15/2005	0	0	1
Liana	Hoodes	8/15/2005	0	0	1
Marty	Mesh	8/15/2005	0	5	1
Kathy	Seus	8/15/2005	0	0	3
Luis	Monge	8/15/2005	0	2	2
JAMES	RIDDLE	8/16/2005	1	0	2
KEVIN	R. O'RELL	8/16/2005	1	1	1
GOLDIE	CAUGHLAN	8/16/2005	1	0	2
ANDREA	CAROE	8/16/2005	1	6	1
DAVID	CARTER	8/16/2005	1	0	1

GERALD	DAVIS	8/16/2005	1	1	2
BEA	E. JAMES	8/16/2005	1	6	1
HUBERT	J. KARREMAN	8/16/2005	1	0	1
ROSALIE	KOENIG	8/16/2005	1	0	1
MICHAEL	P. LACY	8/16/2005	1	2	2
NANCY	M. OSTIGUY	8/16/2005	1	0	2
GEORGE	SIEMON	8/16/2005	1	1	1
JULIE S.	WEISMAN	8/16/2005	1	6	2
JAMES	RIDDLE	8/17/2005	1	0	2
KEVIN	R. O'RELL	8/17/2005	1	1	1
GOLDIE	CAUGHLAN	8/17/2005	1	0	2
ANDREA	CAROE	8/17/2005	1	6	1
DAVID	CARTER	8/17/2005	1	6	3
GERALD	DAVIS	8/17/2005	1	1	2
BEA	E. JAMES	8/17/2005	1	6	1
HUBERT	J. KARREMAN	8/17/2005	1	0	1
ROSALIE	KOENIG	8/17/2005	1	0	1
MICHAEL	P. LACY	8/17/2005	1	2	2
NANCY	M. OSTIGUY	8/17/2005	1	0	2
GEORGE	SIEMON	8/17/2005	1	1	1
JULIE S.	WEISMAN	8/17/2005	1	6	2
Mark	Kastel	8/17/2005	0	0	2
Tony	Azevedo	8/17/2005	0	1	1
Steve	Clarke	8/17/2005	0	1	1
Michael	McGuffin	8/17/2005	0	2	1
Diane	Goodman	8/17/2005	0	0	3
Urvashi	Rangan	8/17/2005	0	3	1
Kathy	Seus	8/17/2005	0	0	1
Joe	Mendelson	8/17/2005	0	3	1
Liana	Hoodes	8/17/2005	0	0	1
Lisa	Hummon	8/17/2005	0	6	2
Brian	Baker	8/17/2005	0	0	1
Joe	Smillie	8/17/2005	3	5	1
Leslie	Zuck	8/17/2005	0	5	1
Marty	Mesh	8/17/2005	0	5	1
Julia	Sabin	8/17/2005	0	1	1
Aaron	Zeis	8/17/2005	0	0	1
Emily	Brown Rosen	8/17/2005	0	5	2
JAMES	RIDDLE	11/16/2005	1	0	2
ANDREA	CAROE	11/16/2005	1	6	1
DAVID	CARTER	11/16/2005	1	6	3
GOLDIE	CAUGHLAN	11/16/2005	1	0	2
GERALD	A. DAVIS	11/16/2005	1	1	2

RIGOBERTO	I. DELGADO	11/16/2005	1	6	1
BEA	E. JAMES	11/16/2005	1	6	1
HUBERT	J. KARREMAN	11/16/2005	1	0	1
ROSALIE L.	KOENIG	11/16/2005	1	0	1
MICHAEL	P. LACY	11/16/2005	1	2	2
KEVIN	O'RELL	11/16/2005	1	1	1
NANCY	OSTIGUY	11/16/2005	1	0	2
GEORGE	SIEMON	11/16/2005	1	1	1
JULIE S.	WEISMAN	11/16/2005	1	6	2
Joe	Smiley	11/16/2005	3	5	1
Cayce	Warf	11/16/2005	0	2	1
Mark	Kastel	11/16/2005	0	4	2
Emily	Brown Rosen	11/16/2005	0	5	2
Tom	Harding	11/16/2005	0	1	0
John	Wood	11/16/2005	0	2	1
Jim	Pierce	11/16/2005	0	5	2
Brian	Baker	11/16/2005	0	5	1
Harriett	Behar	11/16/2005	0	5	2
Lynn	Clarkson	11/16/2005	0	6	1
Zea	Sonnabend	11/16/2005	3	5	2
Steven	Clark	11/16/2005	0	2	1
Diane	Goodman	11/16/2005	0	0	3
Dave	Hilts	11/16/2005	0	2	1
Kim	Dietz	11/16/2005	2	2	2
JAMES	RIDDLE	11/17/2005	1	0	2
ANDREA	CAROE	11/17/2005	1	6	1
DAVID	CARTER	11/17/2005	1	6	3
GOLDIE	CAUGHLAN	11/17/2005	1	0	2
GERALD	A. DAVIS	11/17/2005	1	1	2
RIGOBERTO	I. DELGADO	11/17/2005	1	6	1
BEA	E. JAMES	11/17/2005	1	6	1
HUBERT	J. KARREMAN	11/17/2005	1	0	1
ROSALIE	L. KOENIG	11/17/2005	1	0	1
MICHAEL	P. LACY	11/17/2005	1	2	2
KEVIN	O'RELL	11/17/2005	1	1	1
NANCY	OSTIGUY	11/17/2005	1	0	2
GEORGE	SIEMON	11/17/2005	1	1	1
JULIE	S. WEISMAN	11/17/2005	1	6	2
Harriett	Behar	11/17/2005	0	0	2
Mark	Kastel	11/17/2005	0	0	2
Tom	Harding	11/17/2005	0	1	0
Kelly	Shea	11/17/2005	0	1	1
Wendy	Swann	11/17/2005	0	3	2

Kathy	Arnold	11/17/2005	0	0	1
Jim	Pierce	11/17/2005	0	1	3
Carol	King	11/17/2005	0	0	3
David	Engel	11/17/2005	0	5	1
Joe	Mendelson	11/17/2005	0	3	1
KEVIN	O'RELL	4/19/2006	1	1	1
ANDREA	CAROE	4/19/2006	1	6	1
GERALD	DAVIS	4/19/2006	1	1	2
KEVIN	ENGELBERT	4/19/2006	1	0	1
DAN	GIACOMINI	4/19/2006	1	6	3
JENNIFER	HALL	4/19/2006	1	0	2
HUBERT	KARREMAN	4/19/2006	1	0	1
JEFF	MOYER	4/19/2006	1	0	1
JULIE	WEISMAN	4/19/2006	1	6	2
Rigoberto	Delgado	4/19/2006	0	6	1
Nancy	Ostiguy	4/19/2006	1	0	2
Joe	Smillie	4/19/2006	1	5	1
Bea	James	4/19/2006	1	6	1
Barbara	Robinson	4/19/2006	0	4	1
Mark	Bradley	4/19/2006	0	4	2
Demaris	Wilson	4/19/2006	0	4	2
Valerie	Frances	4/19/2006	0	4	2
Katherine	Benham	4/19/2006	0	4	2
Toni	Strothers	4/19/2006	0	4	2
Richard	Segalla	4/19/2006	0	0	1
Ed	Moltby	4/19/2006	0	0	1
ARTHUR	NEAL	4/19/2006	0	4	1
Frans	Wielemaker	4/19/2006	0	2	1
Steve	Etko	4/19/2006	0	0	1
Charles	Blood	4/19/2006	0	0	2
Tom	Hutchinson	4/19/2006	0	0	2
Urvashi	Rangan	4/19/2006	0	3	2
Mark	Kastel	4/19/2006	0	1	0
Liana	Hoodes	4/19/2006	0	0	2
Charles	Blood	4/19/2006	0	0	3
Dave	DeCou	4/19/2006	0	5	1
Brian	Baker	4/19/2006	0	0	1
Jim	Gardiner	4/19/2006	0	0	1
Grace	Marroquin	4/19/2006	0	6	1
Sally	Brown	4/19/2006	0	0	1
Jim	Pierce	4/19/2006	0	1	3
Eric	Sideman	4/19/2006	2	0	2
Liana	Hoodes	4/19/2006	0	0	1

Joe	Krawczyk	4/19/2006	0	2	1
Tom	Kimmons	4/19/2006	0	1	1
Emily	Brown-Rosen	4/19/2006	0	5	2
Kim	Dietz	4/19/2006	2	2	2
Lisa	McCrary	4/19/2006	0	0	2
Sara	Flack	4/19/2006	0	0	2
Nicole	Dehne	4/19/2006	0	5	2
Leslie	Zuck	4/19/2006	0	5	2
Rick	Segalla	4/19/2006	0	0	1
Kathie	Arnold	4/19/2006	0	0	1
Steve	Pechacek	4/19/2006	0	0	1
Zea	Sonnabend	4/19/2006	0	5	2
Stephen	Clark	4/19/2006	0	1	1
Jorge	Gaskins	4/19/2006	0	1	2
Richard	Martin	4/19/2006	0	2	1
Lynn	Clarkson	4/19/2006	0	6	1
Becky	Goldburg	4/19/2006	3	3	2
Kelly	Shea	4/19/2006	0	1	1
Paul	Stalley	4/19/2006	0	1	1
Jeneke	Dejong	4/19/2006	0	1	1
George	Wright	4/19/2006	0	0	1
KEVIN	O'RELL	4/20/2006	1	1	1
ANDREA	CAROE	4/20/2006	1	6	1
BEA	JAMES	4/20/2006	1	6	1
GERALD	DAVIS	4/20/2006	1	1	2
RIGOBERTO	DELGADO	4/20/2006	1	6	1
KEVIN	ENGELBERT	4/20/2006	1	0	1
DAN	GIACOMINI	4/20/2006	1	6	3
HUBERT	KARREMAN	4/20/2006	1	0	1
JEFF	MOYER	4/20/2006	1	0	1
NANCY	OSTIGUY	4/20/2006	1	0	2
JOE	SMILLIE	4/20/2006	1	5	1
JULIE	WEISMAN	4/20/2006	1	6	2
George	Siemon	4/20/2006	1	1	1
Albert	Straus	4/20/2006	0	1	1
Tony	Moore	4/20/2006	0	1	1
Bill	Clymer	4/20/2006	0	2	2
Dave	Hiltz	4/20/2006	0	2	1
Lou	Anderson	4/20/2006	0	1	3
Cayse	Warf	4/20/2006	0	2	1
Gwendolyn	Wyard	4/20/2006	0	5	2
Eric	Sideman	4/20/2006	2	0	2
Tina	Ellor	4/20/2006	3	1	2

Tom	Hutchinson	4/20/2006	0	2	1
Diane	Goodman	4/20/2006	0	0	1
Miles	McEvoy	4/20/2006	0	4	2
Steffen	Scheide	4/20/2006	0	2	2
Rick	Segalla	4/20/2006	0	0	1
Adam	Eidinger	4/20/2006	0	0	1
David	Engel	4/20/2006	0	5	2
Lisa	Engelbert	4/20/2006	0	0	1
Bonnie	Wideman	4/20/2006	0	5	1
KEVIN	R. O'RELL	10/17/2006	1	1	1
ANDREA	CAROE	10/17/2006	1	6	1
BEA	E. JAMES	10/17/2006	1	6	1
GERALD A.	DAVIS	10/17/2006	1	1	2
RIGOBERTO	I. DELGADO	10/17/2006	1	6	1
KEVIN	ENGELBERT	10/17/2006	1	0	1
DANIEL	G. GIACOMINI	10/17/2006	1	6	3
JENNIFER	M. HALL	10/17/2006	1	0	2
HUBERT	J. KARREMAN	10/17/2006	1	0	1
MICHAEL P.	LACY	10/17/2006	1	2	2
JEFFREY	W. MOYER	10/17/2006	1	0	1
NANCY	M. OSTIGUY	10/17/2006	1	0	2
JOSEPH	SMILLIE	10/17/2006	1	5	1
JULIE S.	WEISMAN	10/17/2006	1	6	2
Jim	Riddle	10/17/2006	2	0	2
Grace	Marroquin	10/17/2006	0	6	1
Richard	Siegel	10/17/2006	0	1	3
Diane	Goodman	10/17/2006	0	0	3
Sean	Taylor	10/17/2006	0	2	1
Gwendolyn	Wyard	10/17/2006	0	0	3
Lynn	Coody	10/17/2006	0	0	3
Katherine	DiMatteo	10/17/2006	0	0	1
George	Kuepper	10/17/2006	0	3	2
Tina	Ellor	10/17/2006	0	1	2
Emily	Brown Rosen	10/17/2006	0	5	2
Suren	Mishra	10/17/2006	0	2	2
Tony	Pavel	10/17/2006	0	2	3
Jim	Pierce	10/17/2006	0	5	2
Leslie	Zuck	10/17/2006	0	5	1
Kim	Dietz	10/17/2006	2	2	2
Brian	Rikita	10/17/2006	0	0	1
Patricia	Kane	10/17/2006	0	5	2
KEVIN	O'RELL	10/18/2006	1	1	1
ANDREA	CAROE	10/18/2006	1	6	2

BEA	JAMES	10/18/2006	1	6	1
GERALD	DAVIS	10/18/2006	1	1	2
RIGOBERTO	DELGADO	10/18/2006	1	6	1
KEVIN	ENGELBERT	10/18/2006	1	0	1
DAN	GIACOMINI	10/18/2006	1	6	3
HUBERT	KARREMAN	10/18/2006	1	0	1
NANCY	OSTIGUY	10/18/2006	1	0	2
JOE	SMILLIE	10/18/2006	1	5	1
JULIE	WEISMAN	10/18/2006	1	6	2
MICHAEL P.	LACY	10/18/2006	1	2	2
JENNIFER	HALL	10/18/2006	1	0	2
Richard	Vento	10/18/2006	0	1	1
Tom	Hutcheson	10/18/2006	0	2	1
Joe	Mendelson	10/18/2006	0	3	1
Amy	Nankivil	10/18/2006	0	1	2
Andrianna	Natsoulas	10/18/2006	0	3	2
Rhonda	Belluso	10/18/2006	0	3	2
Dave	Townsend	10/18/2006	0	2	1
George	Kalogridis	10/18/2006	0	1	1
Katherine	DiMatteo	10/18/2006	0	0	1
Steffan	Hake	10/18/2006	0	2	2
Rich	Theuer	10/18/2006	0	6	2
Leslie	Zuck	10/18/2006	0	5	1
Steffan	Scheide.	10/18/2006	0	2	2
Lisa	Engelbert	10/18/2006	0	0	1
Lianna	Hoodes	10/18/2006	0	0	1
Lynn	Coody	10/18/2006	0	0	3
David	Engel	10/18/2006	0	5	1
Richard	Siegel	10/18/2006	0	2	3
KEVIN	O'RELL	10/19/2006	1	1	1
ANDREA	CAROE	10/19/2006	1	6	1
BEA	JAMES	10/19/2006	1	6	1
GERALD	DAVIS	10/19/2006	1	1	2
RIGOBERTO	DELGADO	10/19/2006	1	0	2
KEVIN	ENGELBERT	10/19/2006	1	0	1
DAN	GIACOMINI	10/19/2006	1	6	1
HUBERT	KARREMAN	10/19/2006	1	0	1
NANCY	OSTIGUY	10/19/2006	1	0	2
JOE	SMILLIE	10/19/2006	1	5	1
JULIE	WEISMAN	10/19/2006	1	6	2
MICHAEL P.	LACY	10/19/2006	1	2	2
JENNIFER	HALL	10/19/2006	1	0	2
JEFF	MOYER	10/19/2006	1	0	1

ANDREA	CAROE	3/27/2007	1	6	1
BEA	JAMES	3/27/2007	1	6	1
DANIEL	Giacomini	3/27/2007	1	6	3
GERALD	DAVIS	3/27/2007	1	1	2
JENNIFER	HALL	3/27/2007	1	0	2
JEFF	MOYER	3/27/2007	1	0	1
JOE	SMILLIE	3/27/2007	1	5	1
JULIE	WEISMAN	3/27/2007	1	6	2
KEVIN	ENGELBERT	3/27/2007	1	0	1
KATRINA	HEINZE	3/27/2007	1	2	2
Rigoberto	DELGATO	3/27/2007	1	6	1
STEVE	DEMURE	3/27/2007	1	2	1
TRACY	MIEDEMA	3/27/2007	1	1	1
MARK	BRADLEY	3/27/2007	0	4	2
BRUCE	KNIGHT	3/27/2007	0	4	2
WILL	FANTLE	3/27/2007	0	0	1
BARBARA	BLAKISTONE	3/27/2007	0	2	1
NANCY	HIRSCHBERG	3/27/2007	0	1	1
JIM	RIDDLE	3/27/2007	2	0	2
ANDREA	KAVANAUGH	3/27/2007	0	3	1
JIM	PIERCE	3/27/2007	0	5	2
RICK	MOONEN	3/27/2007	0	6	1
SUE ANN	McAVOY	3/27/2007	0	2	2
MARC	COOL	3/27/2007	0	1	1
JOESEPH	MENDELSON	3/27/2007	0	3	1
BRIAN	BAKER	3/27/2007	0	5	1
LISA	ENGELBERT	3/27/2007	0	0	1
CARALEA	ARNOLD	3/27/2007	0	1	3
Emily	BROWN ROSEN	3/27/2007	0	5	2
TOM	FERGUSON	3/27/2007	0	6	2
JOE	DICKSON	3/27/2007	3	1	2
LESLIE	ZUCK	3/27/2007	0	5	1
ANDREA	CAROE	3/28/2007	1	6	1
BEA	JAMES	3/28/2007	1	6	1
DANIEL	Giacomini	3/28/2007	1	6	3
GERALD	DAVIS	3/28/2007	1	1	2
JENNIFER	HALL	3/28/2007	1	0	2
JEFF	MOYER	3/28/2007	1	0	1
JOE	SMILLIE	3/28/2007	1	5	1
JULIE	WEISMAN	3/28/2007	1	6	2
KEVIN	ENGELBERT	3/28/2007	1	0	1
KATRINA	HEINZE	3/28/2007	1	2	2
Rigoberto	DELGATO	3/28/2007	1	6	1

STEVE	DEMURE	3/28/2007	1	2	1
TRACY	MIEDEMA	3/28/2007	1	1	1
MARK	BRADLEY	3/28/2007	0	4	2
GARY	ROBERTSON	3/28/2007	0	2	1
NANCY	HIRSCHBERG	3/28/2007	0	1	1
EMILY	BROWN ROSEN	3/28/2007	0	5	2
GRACE	MARROQUIN	3/28/2007	0	6	1
DOM	REPTA	3/28/2007	0	3	1
KELLY	SHEA	3/28/2007	0	1	1
HARRIET	BEHAR	3/28/2007	0	0	2
NADINE	BARTHOLONEW	3/28/2007	0	3	3
COREY	PEET	3/28/2007	0	1	3
LUKE	KAZMIERSKI	3/28/2007	0	2	2
CONI	FRANCIS	3/28/2007	0	2	0
KIMBERLY	GILBERT	3/28/2007	0	2	2
STEVEN	FENNIMORE	3/28/2007	0	4	3
MIKE	THORP	3/28/2007	0	2	2
RICHARD	Theuer	3/28/2007	2	6	2
MJ	MARSHALL	3/28/2007	0	2	1
KIM	EASON	3/28/2007	0	5	1
URVASHI	RANKIN	3/28/2007	0	3	1
TOM	HUTCHESON	3/28/2007	0	2	1
NEIL	SIMMS	3/28/2007	0	1	1
BARBARA	GLENN	3/28/2007	0	2	3
SEAN	Taylor	3/28/2007	0	2	1
WIM	CAERS	3/28/2007	0	2	2
JORGE	GASKINS	3/28/2007	0	1	2
TONY	MOORE	3/28/2007	0	1	1
BRIAN	BAKER	3/28/2007	0	5	1
WILL	FANTLE	3/28/2007	0	0	1
JEFF	RACHERTY	3/28/2007	0	1	2
ZEA	Sonnebrand	3/28/2007	3	5	2
LUIS	MONGE	3/28/2007	0	2	2
DAVID	GUGGENHEIM	3/28/2007	0	1	1
JULIANNE	MAYO	3/28/2007	0	2	2
RICHARD	MARTIN	3/28/2007	0	2	1
STEVEN	CRAIG	3/28/2007	0	4	2
ANDREA	CAROE	3/29/2007	1	6	1
Steve	DeMuri	3/29/2007	1	2	1
Jennifer	Hall	3/29/2007	1	0	2
Katerina	Heinze	3/29/2007	1	2	2
Gerald	Davis	3/29/2007	1	1	2
Rigoberto	Delgado	3/29/2007	1	6	1

Bea	James	3/29/2007	1	6	1
Julie	Weisman	3/29/2007	1	6	2
Joseph	Smillie	3/29/2007	1	5	1
Jeffrey	Moyer	3/29/2007	1	0	1
Kevin	Engelbert	3/29/2007	1	0	1
Tracy	Miederma	3/29/2007	1	1	1
Daniel	Giacomini	3/29/2007	1	6	3
MARK	BRADLEY	3/29/2007	0	4	2
BOB	POOLER	3/29/2007	0	4	2
VALERIE	FRANCES	3/29/2007	0	4	2
Tim	Redmond	3/29/2007	0	1	1
Sean	Taylor	3/29/2007	0	2	1
John	Cadoux	3/29/2007	0	0	1
Kelly	Shea	3/29/2007	0	1	1
Emily	Brown-Rosen	3/29/2007	0	5	2
Pat	Kane	3/29/2007	0	5	2
Ram		3/29/2007	0	5	1
Dave	Carter	3/29/2007	2	2	3
Alexis	Baden-Mayer	3/29/2007	0	3	1
Steffan	Scheide	3/29/2007	0	2	2
Nicole	Dehne	3/29/2007	0	5	2
Kim	Dietz	3/29/2007	2	2	2
Harriet	Behar	3/29/2007	0	0	2
Dave	Engel	3/29/2007	0	5	2
Amelie	Hayte	3/29/2007	0	2	2
Adrianna	Natsoulas	3/29/2007	0	3	2
George	Lockwood	3/29/2007	0	0	2
Rob	Mayo	3/29/2007	0	2	1
Sebastian	Bell	3/29/2007	0	0	2
Stephen	Walker	3/29/2007	0	5	2
Luke	KAZMIERSKI	3/29/2007	0	2	2
Zea	Sonnebrand	3/29/2007	3	5	2
Marty	Mesh	3/29/2007	0	5	1
Rich	Theuer	3/29/2007	2	6	2
ANDREA	CAROE	11/27/2007	1	6	1
GERALD	DAVIS	11/27/2007	1	1	2
RIGOBERTO	DELGADO	11/27/2007	1	6	1
STEVE	DEMURI	11/27/2007	1	2	1
TINA	ELLOR	11/27/2007	1	1	2
KEVIN	ENGELBERT	11/27/2007	1	0	1
DANIEL	GIACOMINI	11/27/2007	1	6	3
JENIFER	HALL	11/27/2007	1	0	2
KATRINA	HEINZE	11/27/2007	1	2	2

BEA	JAMES	11/27/2007	1	6	1
HUE	KARREMAN	11/27/2007	1	0	1
TRACY	MIEDEMA	11/27/2007	1	1	1
JEFF	MOYER	11/27/2007	1	0	1
JOE	SMILLIE	11/27/2007	1	5	1
JULIE	WEISMAN	11/27/2007	1	6	2
BARBARA	ROBINSON	11/27/2007	0	4	1
MARK	BRADLEY	11/27/2007	0	4	2
KATHERINE	BENHAM	11/27/2007	0	4	2
VALERIE	FRANCES	11/27/2007	0	4	2
ROBERT	POOLER	11/27/2007	0	4	2
JON	MELVIN	11/27/2007	0	4	2
RICHARD	MATTHEWS	11/27/2007	0	4	2
VALERIE	SCHMALE	11/27/2007	0	4	2
URVASHI	RANGAN	11/27/2007	0	3	1
CARRIE	BROWNSTEIN	11/27/2007	0	1	1
JIM	PIERCE	11/27/2007	0	5	2
JOE	MENDELSON	11/27/2007	0	3	1
PATTY	LOVERA	11/27/2007	0	3	1
BECKY	GOLDBURG	11/27/2007	2	3	2
SEBASTIAN	BELLE	11/27/2007	0	0	2
SHAH	ALAM	11/27/2007	0	2	2
JONATHON	SHEPHERD	11/27/2007	0	2	1
CRAIG	BROWDY	11/27/2007	0	4	1
TORBJORN	ASGARD	11/27/2007	0	3	2
BRAD	HICKS	11/27/2007	0	6	1
GEORGE	LOCKWOOD	11/27/2007	0	0	2
DAVID	GUGGENHEIM	11/27/2007	0	1	1
DICK	MARTIN	11/27/2007	0	2	1
MARK	KASTEL	11/27/2007	0	0	2
HARRIET	BEHAR	11/27/2007	0	0	2
ANDREA	CAROE	11/28/2007	1	6	1
GERALD	DAVIS	11/28/2007	1	1	2
RIGOBERTO	DELGADO	11/28/2007	1	6	1
STEVE	DEMURI	11/28/2007	1	2	1
TINA	ELLOR	11/28/2007	1	1	2
KEVIN	ENGELBERT	11/28/2007	1	0	1
DANIEL	GIACOMINI	11/28/2007	1	6	3
JENIFER	HALL	11/28/2007	1	0	2
KATRINA	HEINZE	11/28/2007	1	2	2
BEA	JAMES	11/28/2007	1	6	1
HUE	KARREMAN	11/28/2007	1	0	1
TRACY	MIEDEMA	11/28/2007	1	1	1

JEFF	MOYER	11/28/2007	1	0	1
JOE	SMILLIE	11/28/2007	1	5	1
JULIE	WEISMAN	11/28/2007	1	6	2
BARBARA	ROBINSON	11/28/2007	0	4	1
MARK	BRADLEY	11/28/2007	0	4	2
KATHERINE	BENHAM	11/28/2007	0	4	2
VALERIE	FRANCES	11/28/2007	0	4	2
ROBERT	POOLER	11/28/2007	0	4	2
JON	MELVIN	11/28/2007	0	4	2
RICHARD	MATTHEWS	11/28/2007	0	4	2
VALERIE	SCHMALE	11/28/2007	0	4	2
JIM	PIERCE	11/28/2007	0	6	1
TOM	HUTCHESON	11/28/2007	0	1	2
DeETTA	BILEK	11/28/2007	0	5	1
MICHAEL	SLIGH	11/28/2007	2	0	1
GARRY	LEAN	11/28/2007	0	5	1
KATHERINE	DiMATTEO	11/28/2007	0	0	1
LIANA	HOODES	11/28/2007	0	0	1
KIMBERLY	EASSON	11/28/2007	0	5	1
JOHN	FOSTER	11/28/2007	1	1	2
SUE	BAIRD	11/28/2007	0	5	2
PAT	KANE	11/28/2007	0	5	2
TIFFANIE	HUDSON LABBE	11/28/2007	0	5	2
GWEN	WYARD	11/28/2007	0	5	2
JAKE	LEWIN	11/28/2007	0	5	2
SAM	WELSH	11/28/2007	0	5	1
MARC	COOL	11/28/2007	0	1	1
MAURY	JOHNSON	11/28/2007	0	1	2
MARTY	MESH	11/28/2007	0	5	1
LESLIE	ZUCK	11/28/2007	0	5	1
EMILY	BROWN-ROSEN	11/28/2007	0	5	2
GRACE	MARROQUIN	11/28/2007	0	6	1
GRACE	GERSHUNNY	11/28/2007	0	0	1
BRIAN	BAKER	11/28/2007	0	5	1
ZEA	SONNABEND	11/28/2007	3	5	2
ROSE	KOENIG	11/28/2007	2	0	1
JUDY	THOMPSON	11/28/2007	0	2	2
LAWRENCE	MARAIS	11/28/2007	0	2	2
MITCH	JOHNSON	11/28/2007	0	2	2
DAVE	MARTINELLI	11/28/2007	0	1	1
KELLY	SHEA	11/28/2007	0	1	1
HARRIET	BEHAR	11/28/2007	0	0	2
LIANA	HOODES	11/28/2007	0	0	1

LAWRENCE	DATNOFF	11/28/2007	0	4	1
ANDREA	CAROE	11/29/2007	1	6	1
GERALD	DAVIS	11/29/2007	1	1	2
RIGOBERTO	DELGADO	11/29/2007	1	6	1
STEVE	DEMURI	11/29/2007	1	2	1
TINA	ELLOR	11/29/2007	1	1	2
KEVIN	ENGELBERT	11/29/2007	1	0	1
DANIEL	GIACOMINI	11/29/2007	1	6	3
JENIFER	HALL	11/29/2007	1	0	2
KATRINA	HEINZE	11/29/2007	1	2	2
BEA	JAMES	11/29/2007	1	6	1
HUE	KARREMAN	11/29/2007	1	0	1
TRACY	MIEDEMA	11/29/2007	1	1	1
JEFF	MOYER	11/29/2007	1	0	1
JOE	SMILLIE	11/29/2007	1	5	1
JULIE	WEISMAN	11/29/2007	1	6	2
BARBARA	ROBINSON	11/29/2007	0	4	1
MARK	BRADLEY	11/29/2007	0	4	2
KATHERINE	BENHAM	11/29/2007	0	4	2
VALERIE	FRANCES	11/29/2007	0	4	2
ROBERT	POOLER	11/29/2007	0	4	2
JON	MELVIN	11/29/2007	0	4	2
RICHARD	MATTHEWS	11/29/2007	0	4	2
VALERIE	SCHMALE	11/29/2007	0	4	2
JOE	DICKSON	11/29/2007	3	1	2
MARK	KASTEL	11/29/2007	0	0	2
STEVE	PEIRCE	11/29/2007	0	6	1
CAREN	WILCOX	11/29/2007	0	1	1
KRISTEN	KNOX	11/29/2007	0	1	2
GWEN	WYARD	11/29/2007	0	5	2
KEITH	OLCOTT	11/29/2007	0	1	2
CONSUELO	ALLEN	11/29/2007	0	1	2
M.J.	MARSHALL	11/29/2007	0	2	1
JOE	DICKSON	11/29/2007	3	1	2
CHERYL	VAN DYNE	11/29/2007	0	2	2
RICK	GREEN	11/29/2007	0	2	2
BARBARA	CHINN	11/29/2007	0	2	2
ROB	EVERTS	11/29/2007	0	1	1
SAM	WELSH	11/29/2007	0	5	1
STEVE	FOURNIER	11/29/2007	0	1	1
ANDREA	CAROE	11/30/2007	1	6	1
GERALD	DAVIS	11/30/2007	1	1	2
RIGOBERTO	DELGADO	11/30/2007	1	6	1

STEVE	DEMURI	11/30/2007	1	2	1
TINA	ELLOR	11/30/2007	1	1	2
KEVIN	ENGELBERT	11/30/2007	1	0	1
DANIEL	GIACOMINI	11/30/2007	1	6	3
JENIFER	HALL	11/30/2007	1	0	2
KATRINA	HEINZE	11/30/2007	1	2	2
BEA	JAMES	11/30/2007	1	6	1
HUE	KARREMAN	11/30/2007	1	0	1
TRACY	MIEDEMA	11/30/2007	1	1	1
JEFF	MOYER	11/30/2007	1	0	1
JOE	SMILLIE	11/30/2007	1	5	1
JULIE	WEISMAN	11/30/2007	1	6	2
BARBARA	ROBINSON	11/30/2007	0	4	1
MARK	BRADLEY	11/30/2007	0	4	2
KATHERINE	BENHAM	11/30/2007	0	4	2
VALERIE	FRANCES	11/30/2007	0	4	2
ROBERT	POOLER	11/30/2007	0	4	2
JON	MELVIN	11/30/2007	0	4	2
RICHARD	MATTHEWS	11/30/2007	0	4	2
VALERIE	SCHMALE	11/30/2007	0	4	2
KIM	DIETZ	11/30/2007	0	4	2
ROBYN	NICK	11/30/2007	0	4	2
MARK	KASTEL	11/30/2007	0	4	2
JIM	PIERCE	11/30/2007	0	4	2
KIM	DIETZ	11/30/2007	2	2	2
ROBYN	NICK	11/30/2007	0	4	2
MARK	KASTEL	11/30/2007	0	0	2
JIM	PIERCE	11/30/2007	0	5	2
RIGOBERTO	DELGADO	5/20/2008	1	6	1
JEFF	MOYER	5/20/2008	1	0	1
KATRINA	HEINZE	5/20/2008	1	2	2
HUE	KARREMAN	5/20/2008	1	0	1
KEVIN	ENGELBERT	5/20/2008	1	0	1
JENIFER	HALL	5/20/2008	1	0	2
JULIE	WEISMAN	5/20/2008	1	6	2
DANIEL	GIACOMINI	5/20/2008	1	6	3
GERALD	DAVIS	5/20/2008	1	1	2
KRISTINE	ELLOR	5/20/2008	1	1	2
TRACY	MIEDEMA	5/20/2008	1	1	1
JOE	SMILLIE	5/20/2008	1	5	1
STEVE	DEMURI	5/20/2008	1	2	1
BARRY	FLAMM	5/20/2008	1	4	2
ED	MALTBY	5/20/2008	0	0	1

CHARLOTTE	VALLAEYS	5/20/2008	0	0	2
HAROLD	NEWCOMB	5/20/2008	0	2	2
PATTY	LOVERA	5/20/2008	0	3	1
HARRIET	BEHAR	5/20/2008	0	0	2
GEORGE	LOCKWOOD	5/20/2008	0	0	2
GEORGE	LEONARD	5/20/2008	0	0	1
BECKY	GOLDBURG	5/20/2008	2	3	1
TOM	HUTCHESON	5/20/2008	0	1	2
BARBARA	BLACKSTONE	5/20/2008	0	2	1
JIM	RIDDLE	5/20/2008	2	0	2
JODY	BIERGIEL	5/20/2008	0	5	1
EMILY	BROWN-ROSEN	5/20/2008	0	5	2
GWEN	WYARD	5/20/2008	0	5	2
GRACE	MARROQUIN	5/20/2008	0	6	1
M.J.	MARSHALL	5/20/2008	0	2	1
DAVID	ADAMS	5/20/2008	0	2	1
KELLY	SHEA	5/20/2008	0	1	1
ZEA	SONNABEND	5/20/2008	3	5	2
JIM	PIERCE	5/20/2008	0	5	2
LIANA	HOODES	5/20/2008	0	0	1
KRISTY	KORB	5/20/2008	0	4	3
MARK	COOL	5/20/2008	0	1	1
PAT	KANE	5/20/2008	0	5	2
WOODY	DERYCKX	5/20/2008	0	1	0
PAUL	RICHARDSON	5/20/2008	0	1	1
BRIAN	BAKER	5/20/2008	0	5	1
JULIA	SABIN	5/20/2008	0	1	1
PATRICK	ARNDT	5/20/2008	0	5	2
PEGGY	MIARS	5/20/2008	0	5	1
SAM	WELSH	5/20/2008	0	5	1
KATHERINE	DiMATTEO	5/20/2008	0	0	1
LESLIE	ZUCK	5/20/2008	0	5	1
DAVID	GUGGENHEIM	5/20/2008	0	1	1
RIGOBERTO	DELGADO	5/21/2008	1	6	1
JEFF	MOYER	5/21/2008	1	0	1
KATRINA	HEINZE	5/21/2008	1	2	2
HUE	KARREMAN	5/21/2008	1	0	1
KEVIN	ENGELBERT	5/21/2008	1	0	1
JENIFER	HALL	5/21/2008	1	0	2
JULIE	WEISMAN	5/21/2008	1	6	2
DANIEL	GIACOMINI	5/21/2008	1	6	3
GERALD	DAVIS	5/21/2008	1	1	2
KRISTINE	ELLOR	5/21/2008	1	1	2

TRACY	MIEDEMA	5/21/2008	1	1	1
JOE	SMILLIE	5/21/2008	1	5	1
BARRY	FLANN	5/21/2008	1	4	2
MESH	MARTY	5/21/2008	0	5	3
CHRIS	PIERCE	5/21/2008	0	1	1
DAVE	WILL	5/21/2008	0	1	1
DAVID	BRUCE	5/21/2008	0	1	1
DAVE	MARTINELLI	5/21/2008	0	1	1
EARL	ZIMMERMAN	5/21/2008	0	1	1
RIGOBERTO	DELGADO	5/22/2008	1	6	1
JEFF	MOYER	5/22/2008	1	0	1
KATRINA	HEINZE	5/22/2008	1	2	2
HUE	KARREMAN	5/22/2008	1	0	1
KEVIN	ENGELBERT	5/22/2008	1	0	1
JENIFER	HALL	5/22/2008	1	0	2
JULIE	WEISMAN	5/22/2008	1	6	2
DANIEL	GIACOMINI	5/22/2008	1	6	3
GERALD	DAVIS	5/22/2008	1	1	2
KRISTINE	ELLOR	5/22/2008	1	1	2
TRACY	MIEDEMA	5/22/2008	1	1	1
JOE	SMILLIE	5/22/2008	1	5	1
BARRY	FLANN	5/22/2008	1	4	2
LYNN	COODY	5/22/2008	0	0	3
EMILY	BROWN ROSEN	5/22/2008	0	5	1
LESLIE	ZUCK	5/22/2008	0	5	1
KELLY	SHEA	5/22/2008	0	1	3
SUSAN	BASSI	5/22/2008	0	2	1
JIM	PIERCE	5/22/2008	0	5	2
KAREN	WILCOX	5/22/2008	0	1	1
BONNIE	WIDEMAN	5/22/2008	0	5	1
JOHN	FOSTER	5/22/2008	3	1	2
SUSIE	BOWMAN	5/22/2008	0	5	1
ALEXIS	BADEN-MAYER	5/22/2008	0	3	1
MARTY	MESH	5/22/2008	0	5	1
RIGOBERTO	DELGADO	11/17/2008	1	6	1
JEFF	MOYER	11/17/2008	1	0	1
GERALD	DAVIS	11/17/2008	1	1	2
STEVE	DEMURI	11/17/2008	1	2	1
TINA	ELLOR	11/17/2008	1	1	2
KEVIN	ENGELBERT	11/17/2008	1	0	1
BARRY	FLAMM	11/17/2008	1	4	2
DANIEL	GIACOMINI	11/17/2008	1	6	3
JENIFER	HALL	11/17/2008	1	0	2

BEA	JAMES	11/17/2008	1	6	1
HUE	KARREMAN	11/17/2008	1	0	1
TRACY	MIEDEMA	11/17/2008	1	1	1
JOE	SMILLIE	11/17/2008	1	5	1
JULIE	WEISMAN	11/17/2008	1	6	2
KATHERINE	BEHNHAM	11/17/2008	0	4	2
VALERIE	FRANCES	11/17/2008	0	4	2
ANDREW	REGALADO	11/17/2008	0	4	2
BARBARA	ROBINSON	11/17/2008	0	4	1
JUDITH	RAGONESI	11/17/2008	0	4	2
MARK	BRADLEY	11/17/2008	0	4	2
RICHARD	MATTHEWS	11/17/2008	0	4	2
ROBERT	POOLER	11/17/2008	0	4	2
SHANNON	NALLY	11/17/2008	0	4	2
RUIHONG	GUO	11/17/2008	0	4	2
VALERIE	SCHMALE	11/17/2008	0	4	2
TAMMIE	WILLBURN	11/17/2008	0	4	2
BABAK	RASTGOUFARD	11/17/2008	0	4	2
ZAHA	LOMAX	11/17/2008	0	4	2
SHAUNTA	NEWBY	11/17/2008	0	4	2
DAVE	MARTINELLI	11/17/2008	0	1	1
DAVE	WILL	11/17/2008	0	1	1
MILES	McEVOY	11/17/2008	0	4	2
JOHN	FOSTER	11/17/2008	3	1	2
JIM	PIERCE	11/17/2008	0	5	2
BROCK	LUNDBERG	11/17/2008	0	2	2
GRACE	MARROQUIN	11/17/2008	0	6	1
CHRISTINE	BUSHWAY	11/17/2008	0	1	1
TOM	HUTCHESON	11/17/2008	0	1	2
ED	MALTBY	11/17/2008	0	0	1
DAVE	ENGEL	11/17/2008	0	5	2
WILL	FANTLE	11/17/2008	0	0	1
ALEXIS	BADEN-MAYER	11/17/2008	0	3	1
DEVLIN	REYNOLDS	11/17/2008	0	1	1
BOB	SMILEY	11/17/2008	0	1	3
TAW	RICHARDSON	11/17/2008	0	1	1
BILL	WOLF	11/17/2008	0	0	1
JO	KRAEMER	11/17/2008	0	4	2
STEVE	MOHR	11/17/2008	0	0	1
BRIAN	BAKER	11/17/2008	0	5	1
RENEE	MANN	11/17/2008	0	5	2
KIM	DIETZ	11/17/2008	2	2	2
EMILY	ROSEN	11/17/2008	0	5	1

GWEN	WYARD	11/17/2008	0	5	2
TIM	REDMAN	11/17/2008	0	2	1
URVASHI	RANGAN	11/17/2008	0	3	1
DICK	MARTIN	11/17/2008	0	2	1
GRANT	CUMMING	11/17/2008	0	6	2
Ramkrishnan	BALASUBRAMANIAN	11/17/2008	0	5	1
MARIANNE	CUFONE	11/17/2008	0	3	2
DALE	KELLEY	11/17/2008	0	2	1
SHAUNA	McKINNON	11/17/2008	0	3	2
JIM	PIERCE	11/17/2008	0	6	1
ISRAEL	SNIR	11/17/2008	0	2	1
BECKY	GOLDBERG	11/17/2008	2	3	1
MARTY	MESH	11/17/2008	0	5	1
GEORGE	KIMBRALL	11/17/2008	0	3	3
DEBORAH	BRISTER	11/17/2008	0	4	2
KEITH	OLCOTT	11/17/2008	0	1	2
PEGGY	MIARS	11/17/2008	0	5	1
KATHERINE	DiMATTEO	11/17/2008	0	0	1
JIM	RIDDLE	11/17/2008	2	0	2
CLAUDIA	REID	11/17/2008	0	5	1
BARBARA	BLAKISTONE	11/17/2008	0	2	1
RIGOBERTO	DELGADO	11/18/2008	1	6	1
JEFF	MOYER	11/18/2008	1	0	1
GERALD	DAVIS	11/18/2008	1	1	2
STEVE	DEMURI	11/18/2008	1	2	1
TINA	ELLOR	11/18/2008	1	1	2
KEVIN	ENGELBERT	11/18/2008	1	0	1
BARRY	FLAMM	11/18/2008	1	4	2
DANIEL	GIACOMINI	11/18/2008	1	6	3
JENIFER	HALL	11/18/2008	1	0	2
BEA	JAMES	11/18/2008	1	6	1
HUE	KARREMAN	11/18/2008	1	0	1
TRACY	MIEDEMA	11/18/2008	1	1	1
JOE	SMILLIE	11/18/2008	1	5	1
JULIE	WEISMAN	11/18/2008	1	6	2
KATHERINE	BEHNHAM	11/18/2008	0	4	2
VALERIE	FRANCES	11/18/2008	0	4	2
ANDREW	REGALADO	11/18/2008	0	4	2
BARBARA	ROBINSON	11/18/2008	0	4	1
JUDITH	RAGONESI	11/18/2008	0	4	2
MARK	BRADLEY	11/18/2008	0	4	2
RICHARD	MATTHEWS	11/18/2008	0	4	2
ROBERT	POOLER	11/18/2008	0	4	2

SHANNON	NALLY	11/18/2008	0	4	2
RUIHONG	GUO	11/18/2008	0	4	2
VALERIE	SCHMALE	11/18/2008	0	4	2
TAMMIE	WILLBURN	11/18/2008	0	4	2
BABAK	RASTGOUFARD	11/18/2008	0	4	2
ZAHA	LOMAX	11/18/2008	0	4	2
SHAUNTA	NEWBY	11/18/2008	0	4	2
CARRIE	BROWNSTEIN	11/18/2008	0	1	1
URVASHI	RANGAN	11/18/2008	0	3	1
BRIAN	CONNOLLY	11/18/2008	0	1	1
GREG	ALDRICH	11/18/2008	0	3	2
GWEN	WYARD	11/18/2008	0	5	2
DENNIS	KIHLSTADIUS	11/18/2008	0	6	3
RON	GONSALVES	11/18/2008	0	6	1
DEBORAH	CARTER	11/18/2008	0	2	0
BRIAN	KOZISEK	11/18/2008	0	5	1
LUKE	HOWARD	11/18/2008	0	1	3
MATT	DILLON	11/18/2008	0	0	1
MARC	COOL	11/18/2008	0	1	1
DeETTA	BILEK	11/18/2008	0	5	1
ROBIN	ALLAN	11/18/2008	0	5	1
KELLY	SHEA	11/18/2008	0	1	1
CONI	FRANCIS	11/18/2008	0	6	0
RICHARD	THEUER	11/18/2008	2	6	2
LYNN	COODY	11/18/2008	0	0	3
LYNN	CLARKSON	11/18/2008	0	6	1
BILL	WOLF	11/18/2008	0	1	3
DEVLIN	REYNOLDS	11/18/2008	0	1	1
PATTI	BURSTEN-DEUTCH	11/18/2008	0	5	1
GRACE	MARROQUIN	11/18/2008	0	6	1
KATHRERINE	DiMATTEO	11/18/2008	0	0	1
WILL	FANTLE	11/18/2008	0	0	3
LISA	ENGELBERT	11/18/2008	0	0	1
HARRIET	BEHAR	11/18/2008	0	0	2
SEBASTIAN	BELLE	11/18/2008	0	0	2
BROCK	LUNDBERG	11/18/2008	0	2	2
RIGOBERTO	DELGADO	11/19/2008	1	6	1
JEFF	MOYER	11/19/2008	1	0	1
GERALD	DAVIS	11/19/2008	1	1	2
STEVE	DEMURI	11/19/2008	1	2	1
TINA	ELLOR	11/19/2008	1	1	2
KEVIN	ENGELBERT	11/19/2008	1	0	1
BARRY	FLAMM	11/19/2008	1	4	2

DANIEL	GIACOMINI	11/19/2008	1	6	3
JENIFER	HALL	11/19/2008	1	0	2
BEA	JAMES	11/19/2008	1	6	1
HUE	KARREMAN	11/19/2008	1	0	1
TRACY	MIEDEMA	11/19/2008	1	1	1
JOE	SMILLIE	11/19/2008	1	5	1
JULIE	WEISMAN	11/19/2008	1	6	2
KATHERINE	BEHNHAM	11/19/2008	0	4	2
VALERIE	FRANCES	11/19/2008	0	4	2
ANDREW	REGALADO	11/19/2008	0	4	2
BARBARA	ROBINSON	11/19/2008	0	4	1
JUDITH	RAGONESI	11/19/2008	0	4	2
MARK	BRADLEY	11/19/2008	0	4	2
RICHARD	MATTHEWS	11/19/2008	0	4	2
ROBERT	POOLER	11/19/2008	0	4	2
SHANNON	NALLY	11/19/2008	0	4	2
RUIHONG	GUO	11/19/2008	0	4	2
VALERIE	SCHMALE	11/19/2008	0	4	2
TAMMIE	WILLBURN	11/19/2008	0	4	2
BABAK	RASTGOUFARD	11/19/2008	0	4	2
ZAHA	LOMAX	11/19/2008	0	4	2
SHAUNTA	NEWBY	11/19/2008	0	4	2
JEFF	MOYER	5/4/2009	1	0	1
DAN	GIACOMINI	5/4/2009	1	6	3
JULIE	WEISMAN	5/4/2009	1	6	2
KATRINA	HEINZE	5/4/2009	1	2	2
GERRY	DAVIS	5/4/2009	1	1	2
TINA	ELLOR	5/4/2009	1	1	2
BARRY	FLAMM	5/4/2009	1	4	2
TRACY	MIEDEMA	5/4/2009	1	1	1
JOE	SMILLIE	5/4/2009	1	5	1
STEVE	DEMURI	5/4/2009	1	2	1
BEA	JAMES	5/4/2009	1	6	1
KEVIN	ENGELBERT	5/4/2009	1	0	1
HUE	KARREMAN	5/4/2009	1	0	1
VALERIE	FRANCES	5/4/2009	0	4	2
BARBARA	ROBINSON	5/4/2009	0	4	1
RICHARD	MATTHEWS	5/4/2009	0	4	1
DEMARIS	WILSON	5/4/2009	0	4	2
BOB	POOLER	5/4/2009	0	4	2
JEFF	MOYER	5/5/2009	1	0	1
DAN	GIACOMINI	5/5/2009	1	6	3
JULIE	WEISMAN	5/5/2009	1	6	2

KATRINA	HEINZE	5/5/2009	1	2	2
GERRY	DAVIS	5/5/2009	1	1	2
TINA	ELLOR	5/5/2009	1	1	2
BARRY	FLAMM	5/5/2009	1	4	2
TRACY	MIEDEMA	5/5/2009	1	1	1
JOE	SMILLIE	5/5/2009	1	5	1
JENIFER	HALL	5/5/2009	1	0	2
STEVE	DEMURI	5/5/2009	1	2	1
BEA	JAMES	5/5/2009	1	6	1
KEVIN	ENGELBERT	5/5/2009	1	0	1
HUE	KARREMAN	5/5/2009	1	0	1
VALERIE	FRANCES	5/5/2009	0	4	2
BARBARA	ROBINSON	5/5/2009	0	4	1
RICHARD	MATTHEWS	5/5/2009	0	4	1
DEMARIS	WILSON	5/5/2009	0	4	2
BOB	POOLER	5/5/2009	0	4	2
DEBORAH	WHITE	5/5/2009	0	6	1
TIM	KAPSNER	5/5/2009	0	1	2
DAVID	BRONNER	5/5/2009	0	0	1
DIANNA	KAY	5/5/2009	0	0	2
SEBASTIAN	BELLE	5/5/2009	0	0	2
JOANNA	BAUMGARTNER	5/5/2009	0	0	1
DAG	FALCK	5/5/2009	0	1	2
JAYDEE	HANSON	5/5/2009	0	3	2
URVASHI	RANGAN	5/5/2009	0	3	1
BILL	WOLF	5/5/2009	0	0	1
KELLY	SCHEA	5/5/2009	0	1	1
HARRIET	BEHAR	5/5/2009	0	0	2
LINDY	BANNISTER	5/5/2009	0	0	2
MICHAEL	CHRISTENSEN	5/5/2009	0	1	0
JEFF	MOYER	5/6/2009	1	0	1
DAN	GIACOMINI	5/6/2009	1	6	3
KATRINA	HEINZE	5/6/2009	1	2	2
GERRY	DAVIS	5/6/2009	1	1	2
TINA	ELLOR	5/6/2009	1	1	2
TRACY	MIEDEMA	5/6/2009	1	1	1
JOE	SMILLIE	5/6/2009	1	5	1
JENIFER	HALL	5/6/2009	1	0	2
BEA	JAMES	5/6/2009	1	6	1
KEVIN	ENGELBERT	5/6/2009	1	0	1
HUE	KARREMAN	5/6/2009	1	0	1
BARBARA	ROBINSON	5/6/2009	0	4	1
RICHARD	MATTHEWS	5/6/2009	0	4	1

DEMARIS	WILSON	5/6/2009	0	4	2
RIGOBERTO	DELGADO	11/3/2009	1	6	1
STEVE	DEMURI	11/3/2009	1	2	1
TINA	ELLOR	11/3/2009	1	1	2
KEVIN	ENGELBERT	11/3/2009	1	0	1
BARRY	FLAMM	11/3/2009	1	4	2
KATRINA	HEINZE	11/3/2009	1	2	2
BEA	JAMES	11/3/2009	1	6	1
HUBERT	KARREMAN	11/3/2009	1	0	1
TRACY	MIEDEMA	11/3/2009	1	1	1
JOE	SMILLIE	11/3/2009	1	5	1
BARBARA	ROBINSON	11/3/2009	0	4	1
MILES	McEVOY	11/3/2009	0	4	2
VALERIE	FRANCES	11/3/2009	0	4	2
MARK	BRADLEY	11/3/2009	0	4	2
SHANNON	NALLY	11/3/2009	0	4	2
RUIHONG	GUO	11/3/2009	0	4	2
VALERIE	SCHMALE	11/3/2009	0	4	2
J.D.	MELVIN	11/3/2009	0	4	2
KATHREN	BENHAM	11/3/2009	0	4	2
BOB	POOLER	11/3/2009	0	4	2
JUDITH	RAGONESI	11/3/2009	0	4	2
TAMMIE	WILBURN	11/3/2009	0	4	2
ANDREW	REGALADO	11/3/2009	0	4	2
TONI	STROTHER	11/3/2009	0	4	2
RICHARD	MATTHEWS	11/3/2009	0	6	3
KIM	DEITZ	11/3/2009	2	2	2
MICHAEL	HANSEN	11/3/2009	0	3	1
TOM	HUTCHESON	11/3/2009	0	1	2
FOREST	EIDBO	11/3/2009	0	3	2
JESSICA	WALDEN	11/3/2009	0	5	2
LIANA	HOODES	11/3/2009	0	0	1
SUSAN	PROLMAN	11/3/2009	0	3	1
BETH	UNGER	11/3/2009	0	1	2
CHARLOTTE	VALLAEYS	11/3/2009	0	0	2
DAVID	WILL	11/3/2009	0	1	1
CHRIS	NICHOLS	11/3/2009	0	1	1
MARK	McCAY	11/3/2009	0	6	1
GREG	HERBRUCK	11/3/2009	0	1	1
KURT	LAUSECKER	11/3/2009	0	1	1
BOB	BEAUREGARD	11/3/2009	0	0	2
GEORGE	BASS	11/3/2009	0	0	1
HAL	KREHER	11/3/2009	0	1	1

HOWARD	MAGWIRE	11/3/2009	0	2	1
JAMES	BARTON	11/3/2009	0	6	2
FRANK	HURTIG	11/3/2009	0	0	2
ED	MALTBY	11/3/2009	0	0	1
ROBIN	ALLAN	11/3/2009	0	5	1
ROBERT	YANG	11/3/2009	0	5	2
LISA	BUNIN	11/3/2009	0	3	2
EMILY	BROWN ROSEN	11/3/2009	0	5	1
DAVE	DECOU	11/3/2009	0	5	1
RICHARD	THEUER	11/3/2009	2	6	2
RENEE	MANN	11/3/2009	0	5	2
KEITH	PITTS	11/3/2009	0	1	1
KRISTIN	KNOX	11/3/2009	0	1	2
LESLIE	ZUCK	11/3/2009	0	5	1
ZEA	SONNEBAND	11/3/2009	3	5	2
PEGGY	MIARS	11/3/2009	0	5	2
BILL	WOLF	11/3/2009	0	0	1
GRACE	MARROQUIN	11/3/2009	0	6	1
GWEN	WYARD	11/3/2009	0	5	2
JOHN	ASHBY	11/3/2009	0	1	2
ALEXIS	BADEN-MAYER	11/3/2009	0	3	1
JAYDEE	HANSON	11/3/2009	0	3	2
DIANE	KAYE	11/3/2009	0	0	2
DAVID	BRONNER	11/3/2009	0	0	1
JOHN	DiLORETO	11/3/2009	0	2	1
BETTY	BUGUSU	11/3/2009	0	2	2
MARCELO	SECCO	11/3/2009	0	2	0
GEORGE	LOCKWOOD	11/3/2009	0	0	2
JEFF	MOYER	11/4/2009	1	0	1
DAN	GIACOMINI	11/4/2009	1	6	3
JULIE	WEISMAN	11/4/2009	1	6	2
RIGOBERTO	DELGADO	11/4/2009	1	6	1
STEVE	DEMURI	11/4/2009	1	2	1
TINA	ELLOR	11/4/2009	1	1	2
KEVIN	ENGELBERT	11/4/2009	1	0	1
BARRY	FLAMM	11/4/2009	1	4	2
KATRINA	HEINZE	11/4/2009	1	2	2
BEA	JAMES	11/4/2009	1	6	1
HUBERT	KARREMAN	11/4/2009	1	0	1
TRACY	MIEDEMA	11/4/2009	1	1	1
JOE	SMILLIE	11/4/2009	1	5	1
MILES	McEVOY	11/4/2009	0	4	2
VALERIE	FRANCES	11/4/2009	0	4	2

MARK	BRADLEY	11/4/2009	0	4	1
SHANNON	NALLY	11/4/2009	0	4	2
RUIHONG	GUO	11/4/2009	0	4	2
VALERIE	SCHMALE	11/4/2009	0	4	2
J.D.	MELVIN	11/4/2009	0	4	2
BOB	POOLER	11/4/2009	0	4	2
JUDITH	RAGONESI	11/4/2009	0	4	2
TAMMIE	WILBURN	11/4/2009	0	4	2
ANDREW	REGALADO	11/4/2009	0	4	2
TONI	STROTHER	11/4/2009	0	4	2
KIM	DEITZ	11/4/2009	1	2	2
WILL	FANTLE	11/4/2009	0	0	1
KELLY	SHEA	11/4/2009	0	1	1
JOE	DICKSON	11/4/2009	3	1	2
RICHARD	MATTHEWS	11/4/2009	0	6	3
JIM	RIDDLE	11/4/2009	2	0	1
JOE	CASEY	11/4/2009	0	2	1
EMILY	BROWN ROSEN	11/4/2009	0	5	1
NICHELE	HARRIET	11/4/2009	0	3	2
SEBESTIAN	BELL	11/4/2009	0	0	1
BONNIE	WIDEMAN	11/4/2009	0	5	1
JIM	PIERCE	11/4/2009	0	5	2
MARTY	MESH	11/4/2009	0	5	1
PATTY	LOVERA	11/4/2009	0	3	1
FARAH	AHMED	11/4/2009	0	2	1
JEFF	MOYER	11/5/2009	1	0	1
DAN	GIACOMINI	11/5/2009	1	6	3
JULIE	WEISMAN	11/5/2009	1	6	2
RIGOBERTO	DELGADO	11/5/2009	1	6	1
STEVE	DEMURI	11/5/2009	1	2	1
TINA	ELLOR	11/5/2009	1	1	2
KEVIN	ENGELBERT	11/5/2009	1	0	1
BARRY	FLAMM	11/5/2009	1	4	2
KATRINA	HEINZE	11/5/2009	1	2	2
BEA	JAMES	11/5/2009	1	6	1
HUBERT	KARREMAN	11/5/2009	1	0	1
TRACY	MIEDEMA	11/5/2009	1	1	1
JOE	SMILLIE	11/5/2009	1	5	1
MILES	McEVOY	11/5/2009	0	4	2
VALERIE	FRANCES	11/5/2009	0	4	2
MARK	BRADLEY	11/5/2009	0	4	1
SHANNON	NALLY	11/5/2009	0	4	2
RUIHONG	GUO	11/5/2009	0	4	2

VALERIE	SCHMALE	11/5/2009	0	4	2
J.D.	MELVIN	11/5/2009	0	4	2
BOB	POOLER	11/5/2009	0	4	2
JUDITH	RAGONESI	11/5/2009	0	4	2
TAMMIE	WILBURN	11/5/2009	0	4	2
ANDREW	REGALADO	11/5/2009	0	4	2
TONI	STROTHER	11/5/2009	0	4	2
DANIEL	GIACOMINI	4/26/2010	1	6	3
TRACY	MIEDEMA	4/26/2010	1	1	1
TINA	ELLOR	4/26/2010	1	1	2
STEVE	DEMURI	4/26/2010	1	2	1
JOE	DICKSON	4/26/2010	1	1	2
JAY	FELDMAN	4/26/2010	1	0	1
BARRY	FLAMM	4/26/2010	1	4	2
JOHN	FOSTER	4/26/2010	1	1	2
WENDY	FULWIDER	4/26/2010	1	1	2
JENIFER	HALL	4/26/2010	1	0	2
KATRINA	HEINZE	4/26/2010	1	2	2
JEFF	MOYER	4/26/2010	1	0	1
ANNETE	RIHERD	4/26/2010	1	0	1
JOE	SMILLIE	4/26/2010	1	5	1
MILES	McEVOY	4/26/2010	0	4	2
JUDY	RAGONESI	4/26/2010	0	4	2
VALERIE	FRANCES	4/26/2010	0	4	2
ARTHUR	NEAL	4/26/2010	0	4	1
MARK	BRADLEY	4/26/2010	0	4	1
LARS	CRAIL	4/26/2010	0	4	2
SHANNON	NALLY	4/26/2010	0	4	2
KERRY	SMITH	4/26/2010	0	4	2
LISA	BRINES	4/26/2010	0	4	2
DANIEL	GIACOMINI	4/27/2010	1	6	3
TRACY	MIEDEMA	4/27/2010	1	1	1
TINA	ELLOR	4/27/2010	1	1	2
STEVE	DEMURI	4/27/2010	1	2	1
JOE	DICKSON	4/27/2010	1	1	2
JAY	FELDMAN	4/27/2010	1	0	1
BARRY	FLAMM	4/27/2010	1	4	2
JOHN	FOSTER	4/27/2010	1	1	2
WENDY	FULWIDER	4/27/2010	1	1	2
JENIFER	HALL	4/27/2010	1	0	2
KATRINA	HEINZE	4/27/2010	1	2	2
JEFF	MOYER	4/27/2010	1	0	1
ANNETE	RIHERD	4/27/2010	1	0	1

JOE	SMILLIE	4/27/2010	1	5	1
MILES	McEVOY	4/27/2010	0	4	2
JUDY	RAGONESI	4/27/2010	0	4	2
VALERIE	FRANCES	4/27/2010	0	4	2
ARTHUR	NEAL	4/27/2010	0	4	1
MARK	BRADLEY	4/27/2010	0	4	1
LARS	CRAIL	4/27/2010	0	4	2
SHANNON	NALLY	4/27/2010	0	4	2
KERRY	SMITH	4/27/2010	0	4	2
LISA	BRINES	4/27/2010	0	4	2
PEGGY	MIARS	4/27/2010	0	0	1
ALEXIS	RANDOLPH	4/27/2010	0	5	2
GARY	MIDDLETON	4/27/2010	0	0	1
LIANA	HOODES	4/27/2010	0	0	1
ROD	CROSSLEY	4/27/2010	2	0	3
GRACE	MARROQUIN	4/27/2010	0	6	1
KIM	DEITZ	4/27/2010	2	2	2
KELLY	SHEA	4/27/2010	0	1	1
PATTY	LOVERA	4/27/2010	0	3	1
JENIFER	FEARING	4/27/2010	0	3	1
URVANSHI	RANGAN	4/27/2010	0	3	1
JOHN	BAKER	4/27/2010	0	0	1
WILL	FANTLE	4/27/2010	0	0	1
WALTER	GOLDSTEIN	4/27/2010	0	0	1
STEVE	RICKE	4/27/2010	0	0	2
DAVE	MARTINELLI	4/27/2010	0	1	1
GREG	HERBRUCK	4/27/2010	0	1	1
KURT	LAUSECKER	4/27/2010	0	1	1
STEVE	MAHRT	4/27/2010	0	1	1
GEORGE	BASS	4/27/2010	0	0	1
GEORGE	BEAUREGARD	4/27/2010	0	0	2
HAL	KREHER	4/27/2010	0	1	1
ARNOLD	RIEBLI	4/27/2010	0	1	1
LISA	McCRORY	4/27/2010	0	0	2
DAVE	WILL	4/27/2010	0	1	2
ROBIN	ALLEN	4/27/2010	0	5	1
DAVE	CARTER	4/27/2010	2	2	3
BETH	UNGER	4/27/2010	0	1	2
GAY	TIMMONS	4/27/2010	0	0	1
JO ANN	BAUMGARTNER	4/27/2010	0	0	1
ZEA	BONNEBAND	4/27/2010	3	0	0
BONNIE	WIDEMAN	4/27/2010	0	5	1
GARTH	KARL	4/27/2010	0	5	2

CARMELA	BECK	4/27/2010	3	6	2
BRIAN	McEVOY	4/27/2010	0	6	0
EDWARD	GILDEA	4/27/2010	0	0	1
	FERNANDEZ-				
LINDSAY	SALVADOR	4/27/2010	0	5	2
BOB	DURST	4/27/2010	0	5	3
DRAGON	MACURA	4/27/2010	0	0	1
PAUL	DOLAN	4/27/2010	0	0	1
PAULO	BONETTI	4/27/2010	0	0	1
BRIAN	FITZPATRICK	4/27/2010	0	0	1
CHRIS	PISANI	4/27/2010	0	0	2
PATRICK	RIGGS	4/27/2010	0	6	2
AMELIA	SLAYTON	4/27/2010	0	0	1
PAT	LEAVY	4/27/2010	0	6	1
JON	CADOUX	4/27/2010	0	0	1
BILL	WOLF	4/27/2010	0	0	1
RICK	HOLT	4/27/2010	0	2	2
STEPHEN	COLBERT	4/27/2010	0	2	2
WALT	TALAREK	4/27/2010	0	1	3
CAM	WILSON	4/27/2010	0	1	1
LYLE	WONG	4/27/2010	0	4	1
TOM	HUTCHESON	4/27/2010	0	1	2
PATTI	BURSTEN-DEUTCH	4/27/2010	0	5	1
JAKE	LEWIN	4/27/2010	0	5	1
GWEN	WYARD	4/27/2010	0	5	2
STEVE	PEIRCE	4/27/2010	0	6	1
JOHN	ASHBY	4/27/2010	0	1	2
ALEXIS	BADEN-MAYER	4/27/2010	0	3	1
MEREDITH	NILES	4/27/2010	0	3	3
DAVID	BRONNER	4/27/2010	0	0	1
CHERYL	VAN DYNE	4/27/2010	0	2	2
SUSAN	CHENEY	4/27/2010	0	2	2
HARRIET	BEHAR	4/27/2010	0	0	2
BOB	McCLAIN	4/27/2010	0	6	1
DAN	TODD	4/27/2010	0	0	1
NANCY	COOK	4/27/2010	0	6	1
MARTY	MESH	4/27/2010	0	5	1
DANIEL	GIACOMINI	4/28/2010	1	6	3
TRACY	MIEDEMA	4/28/2010	1	1	1
TINA	ELLOR	4/28/2010	1	1	2
STEVE	DEMURI	4/28/2010	1	2	1
JOE	DICKSON	4/28/2010	1	1	2
JAY	FELDMAN	4/28/2010	1	0	1

BARRY	FLAMM	4/28/2010	1	4	2
JOHN	FOSTER	4/28/2010	1	1	2
WENDY	FULWIDER	4/28/2010	1	1	2
JENIFER	HALL	4/28/2010	1	0	2
KATRINA	HEINZE	4/28/2010	1	2	2
JEFFERY	MOYER	4/28/2010	1	0	1
ANNETE	RIHERD	4/28/2010	1	0	1
JOE	SMILLIE	4/28/2010	1	5	1
MILES	McEVOY	4/28/2010	0	4	2
JUDY	RAGONESI	4/28/2010	0	4	2
VALERIE	FRANCES	4/28/2010	0	4	2
ARTHUR	NEAL	4/28/2010	0	4	1
MARK	BRADLEY	4/28/2010	0	4	1
LARS	CRAIL	4/28/2010	0	4	2
SHANNON	NALLY	4/28/2010	0	4	2
KERRY	SMITH	4/28/2010	0	4	2
LISA	BRINES	4/28/2010	0	4	2
DANIEL	GIACOMINI	4/29/2010	1	6	3
TRACY	MIEDEMA	4/29/2010	1	1	1
TINA	ELLOR	4/29/2010	1	1	2
STEVE	DEMURI	4/29/2010	1	2	1
JOE	DICKSON	4/29/2010	1	1	2
JAY	FELDMAN	4/29/2010	1	0	1
BARRY	FLAMM	4/29/2010	1	4	2
JOHN	FOSTER	4/29/2010	1	1	2
WENDY	FULWIDER	4/29/2010	1	1	2
JENIFER	HALL	4/29/2010	1	0	2
KATRINA	HEINZE	4/29/2010	1	2	2
JEFF	MOYER	4/29/2010	1	0	1
ANNETE	RIHERD	4/29/2010	1	0	1
JOE	SMILLIE	4/29/2010	1	5	1
MILES	McEVOY	4/29/2010	0	4	2
JUDY	RAGONESI	4/29/2010	0	4	2
VALERIE	FRANCIS	4/29/2010	0	4	2
ARTHUR	NEAL	4/29/2010	0	4	1
MARK	BRADLEY	4/29/2010	0	4	1
LARS	CRAIL	4/29/2010	0	4	2
SHANNON	NALLY	4/29/2010	0	4	2
KERRY	SMITH	4/29/2010	0	4	2
LISA	BRINES	4/29/2010	0	4	2
DANIEL	GIACOMINI	10/25/2010	1	6	1
STEVE	DEMURI	10/25/2010	1	2	2
JOE	DICKSON	10/25/2010	1	1	2

TINA	ELLOR	10/25/2010	1	1	2
KEVIN	ENGELBERT	10/25/2010	1	0	2
JAY	FELDMAN	10/25/2010	1	0	2
BARRY	FLAMM	10/25/2010	1	4	2
JOHN	FOSTER	10/25/2010	1	1	2
WENDY	FULWIDER	10/25/2010	1	1	2
JENIFER	HALL	10/25/2010	1	0	2
KATRINA	HEINZE	10/25/2010	1	2	2
TRACY	MIEDEMA	10/25/2010	1	1	2
JEFF	MOYER	10/25/2010	1	0	2
JOE	SMILLIE	10/25/2010	1	5	2
MILES	McEVOY	10/25/2010	0	4	0
MELISSA	BAILEY	10/25/2010	0	4	1
LISA	BRINES	10/25/2010	0	4	0
MARK	LIPSON	10/25/2010	0	4	0
ARTHUR	NEAL	10/25/2010	0	4	1
EMILY	BROWN ROSEN	10/25/2010	0	4	0
VALERIE	FRANCIS	10/25/2010	0	4	2
LISA	AHRAMJIAN	10/25/2010	0	4	1
RANDY	ROMANSKI	10/25/2010	0	4	1
CHRISTINE	MASON	10/25/2010	0	4	1
MARK	KASTEL	10/25/2010	0	0	2
CHARLOTTE	VALLAEYS	10/25/2010	0	0	2
MEGHAN	QUINN	10/25/2010	0	1	1
LESLIE	ZUCK	10/25/2010	0	5	1
JASON	PERRAULT	10/25/2010	0	6	1
GRAHAM	RIGBY	10/25/2010	0	2	1
LIANA	HOODES	10/25/2010	0	0	1
WILL	FANTLE	10/25/2010	0	0	3
GRACE	MARROQUIN	10/25/2010	0	6	1
HELEN	KEES	10/25/2010	0	0	1
MICHAEL	ROY	10/25/2010	0	6	1
ANDREW	SCHWARTZ	10/25/2010	0	0	1
DAVE	CARTER	10/25/2010	2	2	3
PATRICK	SMITH	10/25/2010	0	6	1
HARRIET	BEHAR	10/25/2010	0	0	2
PAT	LEAVY	10/25/2010	0	6	1
LAURA	BATCHA	10/25/2010	0	1	1
CLAUDIA	REID	10/25/2010	0	0	1
KIM	DEITZ	10/25/2010	2	2	2
BOB	DURST	10/25/2010	0	5	1
IVAN	MILLER	10/25/2010	0	0	1
RICHARD	WOOD	10/25/2010	0	2	3

BRIAN	TENNIS	10/25/2010	0	1	1
DAVE	CARTER	10/25/2010	2	2	3
PETER	SIMONSON	10/25/2010	0	4	2
ROBIN	ALLAN	10/25/2010	0	5	1
JAKE	LEWIN	10/25/2010	0	5	2
BONNIE	WIDERMAN	10/25/2010	0	5	1
LIANA	HOODES	10/25/2010	0	0	3
RICHARD	MATTHEWS	10/25/2010	0	6	3
HAL	KREHER	10/25/2010	0	1	1
MICHAEL	COX	10/25/2010	0	1	1
RUSS	KLISCH	10/25/2010	0	0	1
DEAN	DICKEL	10/25/2010	0	0	1
SUE	RAKER	10/25/2010	0	0	1
URVANSHI	RANGAN	10/25/2010	0	3	1
ROB	SERRINE	10/25/2010	0	6	2
RYAN	MILLER	10/25/2010	0	1	1
JACKIE	VONRUDEN	10/25/2010	0	5	2
LOREN	YODER	10/25/2010	0	0	1
NATASHA	GILL	10/25/2010	0	0	1
TRUDY	BIALIC	10/25/2010	0	0	1
GREG	HERBRUCK	10/25/2010	0	1	1
JOHN	BAKER	10/25/2010	0	0	1
TROY	AYKAN	10/25/2010	0	1	2
MICHAEL	ARMY	10/25/2010	0	0	1
MATT	O'HAYER	10/25/2010	0	0	1
DANIEL	GIACOMINI	10/26/2010	1	6	1
STEVE	DEMURI	10/26/2010	1	2	2
JOE	DICKSON	10/26/2010	1	1	2
TINA	ELLOR	10/26/2010	1	1	2
KEVIN	ENGELBERT	10/26/2010	1	0	2
JAY	FELDMAN	10/26/2010	1	0	2
BARRY	FLAMM	10/26/2010	1	4	2
JOHN	FOSTER	10/26/2010	1	1	2
WENDY	FULWIDER	10/26/2010	1	1	2
JENIFER	HALL	10/26/2010	1	0	2
KATRINA	HEINZE	10/26/2010	1	2	2
TRACY	MIEDEMA	10/26/2010	1	1	2
JEFF	MOYER	10/26/2010	1	0	2
JOE	SMILLIE	10/26/2010	1	5	2
MILES	McEVOY	10/26/2010	0	4	0
MELISSA	BAILEY	10/26/2010	0	4	1
LISA	BRINES	10/26/2010	0	4	0
MARK	LIPSON	10/26/2010	0	4	0

ARTHUR	NEAL	10/26/2010	0	4	1
EMILY	BROWN ROSEN	10/26/2010	0	4	0
SILVIA	ABEL-CAINES	10/27/2010	0	1	2
BILL	ARDREY	10/27/2010	0	2	1
ALEXIS	BADEN-MAYER	10/27/2010	0	3	1
MELLISSA	BAILEY	10/27/2010	0	4	2
GEORGE	BASS	10/27/2010	0	0	1
HARRIET	BEHAR	10/27/2010	0	0	2
MIKE	BRANDT	10/27/2010	0	3	2
AARON	BRIN	10/27/2010	0	5	2
LISA	BRINES	10/27/2010	0	4	2
EMILY	BROWN ROSEN	10/27/2010	0	5	2
WENDY	BUCKWALTER	10/27/2010	0	3	2
GREGG	BUCKWALTER	10/27/2010	0	0	1
LISA	BUNIN	10/27/2010	0	3	2
JON	CADOUX	10/27/2010	0	0	1
RON	CHRISTIANSEN	10/27/2010	0	1	2
STEVE	DEMURI	10/27/2010	0	4	2
JOE	DICKSON	10/27/2010	1	1	2
KATHERINE	DiMATTEO	10/27/2010	0	0	1
BRUCE	DRINKMAN	10/27/2010	0	0	1
	DRYAK	10/27/2010	0	0	1
PAUL	DURST	10/27/2010	0	2	3
TINA	ELLOR	10/27/2010	1	4	2
CHRIS	ELY	10/27/2010	0	1	1
DAVE	ENGEL	10/27/2010	0	5	2
KEVIN	ENGELBERT	10/27/2010	1	4	2
WILL	FANTLE	10/27/2010	0	0	1
JAY	FELDMAN	10/27/2010	1	0	1
	FERNANDEZ-				
LINDSAY	SALVADOR	10/27/2010	0	5	2
BARRY	FLAMM	10/27/2010	1	4	2
JOHN	FOSTER	10/27/2010	1	1	2
ERIN	FREIBERG	10/27/2010	0	3	2
STEVE	FRENKEL	10/27/2010	0	0	1
PAUL	FREY	10/27/2010	0	0	1
WENDY	FULWIDER	10/27/2010	1	1	2
DANIEL	GIACOMINI	10/27/2010	1	6	3
EDWARD	GILDEA	10/27/2010	0	1	1
JIM	GOODMAN	10/27/2010	0	0	1
PAUL	HABAB	10/27/2010	0	3	1
JENIFER	HALL	10/27/2010	1	0	2
STEFAN	HAUKE	10/27/2010	0	0	3

KATRINA	HEINZE	10/27/2010	1	2	2
TIFFANIE	HUSTON-LABBE	10/27/2010	0	5	2
BEA	JAMES	10/27/2010	2	6	3
HUGH	KARREMAN	10/27/2010	2	0	1
PHIL	LAROCCA	10/27/2010	0	0	1
MARK	LIPSON	10/27/2010	0	4	2
PATTY	LOVERA	10/27/2010	0	3	1
DRAGAN	MACURA	10/27/2010	0	0	1
DAVE	MARTINELLI	10/27/2010	0	1	1
RICHARD	MATTHEWS	10/27/2010	0	6	3
LISA	McCRORY	10/27/2010	0	0	2
MILES	McEVOY	10/27/2010	0	4	2
MARK	McKAY	10/27/2010	0	6	1
PEGGY	MIARS	10/27/2010	0	5	1
TRACY	MIEDEMA	10/27/2010	1	1	1
LUIS	MONGE	10/27/2010	0	2	2
JEFFERY	MOYER	10/27/2010	1	0	1
ARTHUR	NEAL	10/27/2010	0	4	1
JOHN	PECK	10/27/2010	0	0	1
JIM	PIERCE	10/27/2010	0	5	2
JEFF	RICHARDS	10/27/2010	0	6	2
JIM	RIDDLE	10/27/2010	2	0	2
JIM	SCHAHCZENSKI	10/27/2010	0	3	2
KELLY	SHEA	10/27/2010	0	1	1
RICHARD	SIEGEL	10/27/2010	0	1	3
AMELIA	SLAYTON	10/27/2010	0	0	1
JOAN	SMILEY	10/27/2010	0	1	3
JOE	SMILLIES	10/27/2010	1	5	1
KYLA	SMITH	10/27/2010	0	5	2
GREGG	STEVENS	10/27/2010	0	0	2
DOUG	SWANTNER	10/27/2010	0	3	2
SHANNON	SZYMKOWIAK	10/27/2010	0	0	1
BETH	UNGER	10/27/2010	0	1	2
CHARLOTTE	VALLAEYS	10/27/2010	0	0	2
JACKIE	VONRUDEN	10/27/2010	0	5	2
JULIE	WEISMAN	10/27/2010	2	6	3
DAVE	WILL	10/27/2010	0	1	1
CAMERON	WILSON	10/27/2010	0	1	1
BILL	WOLF	10/27/2010	0	0	1
GWEN	WYARD	10/27/2010	0	5	2
GARY	ZIMMER	10/27/2010	0	0	1
DANIEL	GIACOMINI	10/28/2010	1	6	1
STEVE	DEMURI	10/28/2010	1	2	2

JOE	DICKSON		10/28/2010	1	1	2
TINA	ELLOR		10/28/2010	1	1	2
KEVIN	ENGELBERT		10/28/2010	1	0	2
JAY	FELDMAN		10/28/2010	1	0	2
BARRY	FLAMM		10/28/2010	1	4	2
JOHN	FOSTER		10/28/2010	1	1	2
WENDY	FULWIDER		10/28/2010	1	1	2
JENIFER	HALL		10/28/2010	1	0	2
KATRINA	HEINZE		10/28/2010	1	2	2
TRACY	MIEDEMA		10/28/2010	1	1	2
JEFF	MOYER		10/28/2010	1	0	2
JOE	SMILLIE		10/28/2010	1	5	2
MILES	McEVOY		10/28/2010	0	4	2
LISA	AHRAMJIAN		10/28/2010	0	4	1
MELISSA	BAILEY		10/28/2010	0	4	1
LISA	BRINES		10/28/2010	0	4	2
MARK	LIPSON		10/28/2010	0	4	2
ARTHUR	NEAL		10/28/2010	0	4	1
EMILY	BROWN ROSEN		10/28/2010	0	4	0
JULIE	WEISMAN		5/6/2012	1	6	2
BARRY	FLAMM		5/6/2012	1	4	2
STEVE	DEMURI		5/6/2012	1	2	1
VALERIE	FRANCES		5/6/2012	0	4	2
BOB	POOLER		5/6/2012	0	4	2
JILL	AUBURN	2011		0	5	2
EDWARD	AVALOS	2011		0	5	0
GEORGE	BASS	2011		0	1	1
LAURA	BATCHA	2011		0	2	1
CARMELA	BECK	2011		0	7	2
TONY	BEDARD	2011		0	7	1
SARAH	BIRD	2011		0	7	1
REBECCA	BLUE	2011		0	5	2
KARINE	BOUIS-TOWE	2011		0	1	1
MARK	BUSCHING	2011		0	3	3
CHRISTINE	BUSHWAY	2011		0	2	1
STEVE	ETKA	2011		0	1	2
LESLIE	GOLDMAN	2011		0	1	1
KATY	GREEN	2011		0	1	2
CATHY	GREENE	2011		0	5	2
SHANNON	HAMM	2011		0	5	2
JAYDEE	HANSON	2011		0	4	2
SHARON	HESTVIK	2011		0	5	2
KRISTINA	HUBBARD	2011		0	2	1

MARK	KASTEL	2011	0	1	1
SHARI	KOSCO	2011	0	5	2
BETH	LARABEE	2011	0	2	1
MARK	LIPSON	2011	0	5	1
ARIANE	LOTTI	2011	0	1	1
PATTY	LOVERA	2011	0	4	2
	LUSHER				
LINDSAY	SHUTE	2011	0	1	1
EDWARD	MALTBY	2011	0	1	1
CHUCK	MARCY	2011	0	2	3
MILES	MCEVOY	2011	0	5	2
KATHLEEN	MERRIGAN	2011	1	5	1
JOHN	MESKO	2011	0	1	1
MELODY	MEYER	2011	0	2	1
SHEPHERD	OGDEN	2011	0	5	2
COLIN	O'NEIL	2011	0	4	2
SUSAN	PAVLIN	2011	0	4	2
MARY	PEET	2011	0	5	2
JIM	PIERCE	2011	0	2	6
MARK	ROSE	2011	0	5	2
JULIA	SABIN	2011	0	3	1
DAVID	SHIPMAN	2011	0	5	2
RICHARD	SIEGEL	2011	0	3	1
MICHAEL	SLIGH	2011	0	1	1
MATT	SMITH	2011	0	5	2
STEVEN	SMITH	2011	0	5	2
KARRI	STROH	2011	0	1	1
KELLY	STRZELECKI	2011	0	5	2
CHARLOTTE	VALLAEYS	2011	0	1	1
CRAIG	WEAKLEY	2011	1	2	3
CAREN	WILCOX	2011	0	5	2
CATHERINE	WOTEKI	2011	0	5	2
KAREN	WYNNE	2011	0	1	2
LESLIE	ZUCK	2011	0	6	1

Appendix B – List of National Organic Standard Board Members

	Handler January, 1995 – January, 2001
Davis	Gerald A. Grimmway Farms Arvin, CA Organic Producer January, 2005 – January, 2010
Delgado	Rigoberto I. Delgado Farms Houston, TX Organic Producer January, 2005 – January, 2010
DeMuri	Steve Campbell Soup Company Carmichael, CA Handler January, 2007 – January, 2012
Dickson	Joe Whole Foods Market Dripping Springs, TX
Dietz	Kim Smucker’s Chico, CA, Handler January, 2000 – January, 2005
Ellor	Kristine “Tina” Phillip’s Mushrooms Kennett Square, PA Environmentalist January, 2007 – January, 2012
Engelbert	Kevin Engelbert Farms Nichols, NY Organic Producer January, 2006 – January, 2011
Eppley	L. Dean Pleasant Home Farm Wabash, IN Environmentalist January, 1992 – January, 1997
Favre	Tracy Holistic Management International
Feldman	Jay Beyond Pesticides
Flamm	Barry various positions in gov
Foster	John Earthbound Farm Philomath, OR
Friedman	William J. NM Organic Commodity Commission Albuquerque, NM Environmentalist January, 1992 – January, 1997
Fulwider	Wendy CROPP Cooperative / Organic Valley
Giacomini	Daniel Animal Nutritionist Middletown, CA Consumer/Public Interest January, 2006 – January, 2011
Goldburg	Rebecca Environmental Defense New York, NY

Gussow Environmentalists | January, 2000 – January, 2005
Joan
Columbia University | Piermont, NY
Consumer/Public Interest | January, 1996 – January, 2001

Hall Jennifer
Community Food Builder | Spokane, WA
Consumer/Public Interest | January, 2006 – January, 2011

Harper Steven Harper
Small Planet Foods | Bellingham, WA
Handler | January, 1997 – January, 2002

Heinze Katrina, Ph.D
General Mills | Plymouth, MN
Scientist | January, 2007 – January, 2012

Holbrook Dennis
South Texas Organics | Mission, TX
Organic Producer | January, 2002 – January, 2007

Hollen Marvin
Daily Blessings Farm | Nyssa, OR
Organic Producer | January, 1997 – January, 2002

James Bea E.
Lunds and Byerlys | Golden Valley, MN
Retailer | January, 2005 - January, 2010

Kahn Eugene
Cascadian Farms | Rockport, WA
Handler | January, 1992 – January, 1997

Karreman Hubert J.
Veterinarian | Narvon, PA
Environmentalist | January, 2005 – January, 2010

King T. Mark
Indianapolis' Georgetown Market | Indianapolis, IN
Retailer | January, 2000 – January, 2005

Kinsman Donald
American Meat Council | Storrs, CT
Consumer/Public Interest | January, 1992 – January, 1996

Kirschenmann Frederick
Iowa State University | Medina, ND
Organic Producer | January, 1995 – January, 2000

Koenig Rosalie L.
Rosie's Organic Farm | Gainesville, FL
Organic Producer | January, 2001 – January, 2006

Lacy Michael P.
University of Georgia | Athens, GA
Scientist | January, 2002 – January, 2007

Lockeretz William
 Tufts University | Brookline, MA
 Environmentalist | January, 2000 – January, 2005

Lyndon Elizabeth
 National Resource Defense Council | New York, NY
 Consumer/Public Interest | January, 1996 – January, 2001

Maravell Nicholas
 Nick's Organic Farm - Montgomery MD

Merrigan Kathleen
 Wallace Institute for Alternative Agriculture | Greenbelt, MD
 Environmentalist | January, 1995 – June, 1999

Miedema Tracy
 Earthbound Farm | Philomath, OR
 Consumer/Public Interest | January, 2010 – January, 2015

Moyer Jeff
 Rodale Institute | Lenhartsville, PA
 Organic Producer | January, 2005 – January, 2011

O'Rell Kevin R.
 Horizon Organic | Longmont, CO
 Organic Producer | January, 2002 – January, 2007

Ostiguy Nancy M.
 Pennsylvania State University | State College, PA Environmentalist | January, 2002 – January, 2007

Oswailer Gary
 Iowa State University | Boone, IA
 Organic Producer | January, 1992 – January, 1995

Pavich Stephen
 Pavich Family Farms | Terra Bella, CA
 Organic Producer | January, 1996 – January, 2001

Quinn Robert
 Quinn Farm & Ranch | Big Sandy, MO
 Organic Producer | January, 1992 – January, 1995

Richardson Jean
 Consultant and Maple Syrup Producer

Riddle James A.
 Minnesota Department of Agriculture | Winona, MN
 Certifier | January, 2001- January, 2006

Riherd Annette
 Aunt Nettie's Farm | Oologah, OK
 Organic Producer | January, 2010 – September, 2010

Sideman Eric J.
 Maine Organic Farmers & Gardeners Association | Greene, ME
 Scientist | January, 1997 – September, 2002

Siemon	George CROPP Cooperative LaFarge, WI Organic Producer January, 2001 – January, 2006
Sligh	Michael Rural Advancement Foundation International Greenville, SC Consumer/Public Interest January, 1992 – September, 1997
Smillie	Joe QAI International South Burlington, VT Certifying Agent January, 2006 – January, 2011
Sonnabend	Zea California Certified Organic Farmers / Scientist
Stone	Robert
Stoneback	Tom Rodale Books Allentown, PA Organic Producer January, 1992 – January, 1996
Taylor	Jennifer Florida Agricultural & Mechanical University / Public Interest
Taylor	Nancy Northern Utah Organic Growers Potlach, ID Handler January, 1992 – January, 1995
Theuer	Richard Beechnut Chesterfield, MO Handler January, 1992 – January, 1995
Walker	Reuben Southern University and A&M College
Weakley	Craig Muir Glen Yuba City, CA Handler January, 1992 – January, 1996
Weisman	Julie Flavorganics Tenafly, NJ Handler January, 2005 – January, 2010
Welsh	William Organic Prairie Lansing, IA Environmentalist January, 1997 – January, 2002
Wittenberg	Margaret Whole Foods Market Dripping Springs, TX Retailer January, 1995 – January, 2000

Appendix C – Letters submitted to the USDA

3/15/98

Anonymous

I demand the right to choose organic food that is safe and toxin-free. The proposed rules must be changed to maintain strict organic standards. The use of the following must be explicitly prohibited as per the recommendations of the National Organic Standards Board: food irradiation ("ionizing radiation"): genetically engineered foods ("GEOs"): inhumane animal factory farming: animal cannibalism; and, the use of sewer sludge ("bio-solids"). All processes and materials used in organic agriculture must be proven safe with the burden of proof always on the party wishing to use them. Private and state organic certification bodies must be allowed to maintain stricter organic standards than those the USDA requires.

The proposed rules are an insult to truthfulness and freedom and will have a long-lasting and irreparable impact on our nation's well-being. The implications are gravest for our children and the unborn of the future.

Please send me a response to this letter.

Sincerely,

Appendix D – Comments Submitted to USDA

1998

ANONYMOUS

Please accept the following comments on the Proposed Organic Rule and enter them into the official record.

I strongly believe that the Proposed Organic Rule is not compatible or consistent with established organic principles. I

request that the USnA re-issue a Proposed Organic Rule that is based on the legalities of the Organic Food Production

Act of 1990 and the recommendations of the National Organic Standards Board. All comments of this frst Proposed

Organic Rule should remain part of the record for the rulemaking process. Organic fanning, trade and consumer groups

have identified many problem areas in the Proposed Organic Rule. We ask that you protect our strong organic

standards. I have the following specific comments on the Proposed Organic Rule.

To write a credible orglllfc rrde the !!SDA nuut:

1 . Foil ow the recommendations of the National Organic Standards Board which do reflect the will of the organic

commWiity. Restore section 205.4 of the National Organic Standard.<~ Hoard's version of the Proposed Organic

Rule (variance language).

2. Prohibit and never aJ)ow the U.'le ofbio!!Oiids, ioni7.ing irradiation or genetically engineered organisms in a

system of organic production and handlin •.

3. Avoid pricing the small food producer and, food handler out of the organic foods market. T recommend that

USDA use sliding fees scale mther than the proposed flat fee scale.

4. T>efine organic agriculture a.<~: A holistic production and marketing system that promotes and enhances the

agroeco)ogical health, including biodiversity, biological cycles, and soil biological activity. It emphasizes the use

of management practices in preference to the use of off-fann inputs. This is accomplished by using culttJral,

biological and mechanical method. I opposed to using synthetic materials to fulfill any specific function within

the system.

5. Require livestock feed to be ruminant and poultry be free of rendered animal product. Also require only organic

feed fed to organic livestock.

6. Require that livestock have access to fresh air and the outdoors.

7. Prohibit antibiotics, pesticides, synthetic amino acids and growth hormones in organic livestock production.

8. Give the same authority to both accredited State and Private certification programs. State and Private certification

programs should be allowed to display their certification logo anywhere on the product.

9. Allow accredited certifiers to de-certify offenders who are trying to defraud the National Organic Program. As an

accreditation agency the USDA must stay out of the de-certification business process.

10. Uphold the legal authority of the NOSB by prohibiting the Secretary from adding exemptions for the use of

specific synthetic substances to the Proposed National List submitted by the NOSB.

Organic Food is a partnership between the farmer and the consumer. It is not just an environmental label, but a

label representing this unique partnership. In order to build a consumer respected National Organic Program,

the USDA must join in this "partnership" and write a credible Proposed Organic Rule. _

(Additional Comments below, and I or on attached sheet).

Please review comments from the Wedge Community Co-Op, the Coulee Region Organic Production Pool

(CROPP), The Organic Trade Association (OTA), the Independent Organic Inspector Association (IOTA), and

the Organic Materials Research Institute (OMRI). Thank you for reading my comment

Sincerely,

Name/Business.

Address

City/State/Zip Code.

3/25/98

ANONYMOUS

Docket TMD-94-00-2

Eileen S. Stommes, Deputy Administrator

USDA-AMS-TM-NOP

Room 4007 South

Ag Stop CY275

PO Box 96456

Washington, DC 20090-6456

Dear Ms. Stommes:

MAR 25 AM10:02

As a concerned consumer, I am deeply troubled by the USDA's proposed National Organic Rule, released for public comment on December 16, 1997. The rule seriously weakens organic standards and undermines the meaning of the term "organic", contrary to the intention of the Organic Food Production Act of 1990. Therefore, the USDA should withdraw the rule, rewrite it following the recommendations of the National Organic Standards Board (NOSB), and resubmit it for public comment. My objections to the proposed rule include:

- Problem: USDA's standards are weaker than existing organic certification programs and bar private certifiers from setting 'higher' standards [Sections 205.20-205.28].

The USDA's rule should conform to the recommendations of the National Organic Standards Board (NOSB). Under the Organic Foods Production Act of 1990, the

USDA-appointed NOSB has the authority to control how and by whom organic food will be grown and certified. The NOSB includes organic, environmental and consumer representatives and has expertise, credibility and legal authority to make these important and often controversial decisions.

- Problem: The USDA rule allows broad classes of unwanted materials and technologies in organic production [Sections 205.2, 205.7-205.9, 205.22, 205.26, 205.17].

Categories of incompatible substances and processes which are prohibited by the NOSB were allowed by USDA. The rule should prohibit the use of sewage sludge ("biosolids"), food irradiation ("ionizing radiation"), and genetically engineered organisms (GEOs).

These processes are unacceptable and their use would place U.S. standards in conflict with existing industry practice, consumer expectations, and international trade and standards.

- Problem: The USDA creates very weak standards for organic livestock care [Sections 205.13-205.15, 205.22, 205.24].

In accordance with NOSB recommendations, the rule should require that animals have access to the outdoors, prohibit the refeeding of animal parts and manure, severely limit the use of antibiotics, and require organic feed. USDA allows 20% non-organic feed, intensive and perpetual confinement operations, feeding animal parts and manure, and liberal drug use.

- Problem: The USDA's flat fee structure would price small organic farms and smaller certifiers out of business [Sections 205.241-205.244].

Small-scale certifiers, farmers, and processors should not pay a disproportionate share of fees.

A sliding fee system would reduce the impact on small operators.

- Problem: The USDA rule prohibits "green" labels in the name of protecting consumers [Sections 205.103].

USDA should leave other "green" labeling alone. Labeling such as pesticide-free, no

antibiotics or hormones, ecologically produced, humanely raised, and IPM grown are outside the scope of the 1990 Organic Foods Production Act.

Signed Date

Name

Address _

1998

ANONYMOUS

Dear National Organic Program staff:

& a reader of ORGANIC GARDENING magazine, I have kept abreast of the development of the proposed rules and your request for comments. Please revise your proposed rules on organic food production to fully reflect the advice and expertise of the National Organic Standards Board. The Board went to historic lengths to create an open and inclusive process that involved thousands of citizens, including those who are most informed about, and most affected by, this issue.

In particular, I urge you to give us a meaningful choice about how our food is produced and to maintain the integrity of organic agriculture in the final rules by prohibiting all of the following products and practices for food labeled and/ or sold as certified organic:

- Genetically engineered organisms and materials
- Sewage sludge ("biosolids," section 205.22)
- Irradiation ("ionizing radiation")
- All inert ingredients unless they are rated by the EPA as "Generally Recognized & Safe."

(section 205.21(d))

1998

WARREN WATT

Eileen S. Stommes, Deputy Administrator

USDA-AMS-TM-NOP

Room 4007 South, Ag Stop 0275

P.O. Box 96456

Washington, DC 20090-6456

Dear Madam:

As a family farm that exists, in part, by producing beef for the American consumer, we would like to express

our dismay in the recently proposed rules for the National Organic Program. These proposed rules, formulated

originally under the Organic Foods Production Act of 1990, do a disservice to the organic food movement as

well as unjustly regulated numerous niche branded beef programs.

Our family farm is one of approximately 260 family farms in the country that supply beef to the lean, natural

branded beef company, Laura's Lean Beef. Our family has a long history of beef cattle production. However,

the commodity beef business has become increasingly challenging given the higher cost of production, tighter

margins and wide variation in revenue from year to year. Our options were becoming limited. We saw a critical need to change the way we did business and become production specific, market oriented and sustainable in our overall approach to beef production.

Companies such as Laura's Lean Beef have provided that opportunity. By providing our consumer a lean, natural product they have asked for, Laura's Lean Beef has been able to achieve phenomenal growth in the past

decade. We see the partnerships formed between beef producers and Laura's Lean Beef to be viable and one

of the few opportunities in sustainable agriculture. This partnership creates a fair, rewarding beef production

system in which producers profit, Laura's Lean Beef profits and our consumers receive a high-quality beef

product packed with value to serve their families.

Our main concern in the proposed ruling is: Section 205.103. Use of terms or statements that directly or indirectly imply that a product is organically produced and handled. Under this section, terminology is in question as implying beef is organically produced. This includes: No drugs or growth hormones used, raised

without antibiotics, raised without hormones, no growth stimulants administered, ecologically produced,

sustainably harvested and humanely raised. Under the proposed ruling, any company making claims such as

these would be required to follow 100% organic production standards. Laura's Lean Beef and other such companies have made no claims that their product is organic and actually adhere to higher standards for a lean,

natural product than the proposed new organic standards would create. Additionally, there is no doubt that we

would not be able to produce beef cost effectively under the proposed organic standards due to the higher cost

of feed, animals and compliance.

It is our belief that these regulations would stifle the free market and stop companies such as Laura's Lean

Beef from delivering to our consumer the product they have requested. We have never tried to mislead the

consumer into thinking we produce organic product. We produce beef that is lean and raised without antibiotics or growth hormones. These claims are communicated clearly to our consumer. We feel it is far

more appropriate for USDA to enforce label claims rather than dictate what can be produced and what can be

said on a product label. Thank you for your attention to our concerns.

Sincerely,

Warren Watt

Select Supplier

laura's Lean Beef Company

3/24/98

ANONYMOUS

Please accept the following comments on the proposed National Organic Standards and enter them into the official record.

I strongly believe that the proposed rule is not compatible or consistent with long established organic principles!

I respectfully request that the USDA withdraw the proposed rule when the comment period has ended, and all comments

have been received, resubmit the proposed rule based on the recommendations of the National Organic Standards Board

(NOSB) and the comments submitted from the organic community. All comments on the first proposed rule should remain

part of the record for the entire rulemaking process. Organic farming, trade and consumer groups have identified as many as

90 points where the proposed rules or USDA request for comments deviates from the high standards that reputable certifying

agencies and states have established. I have the following specific comments on the proposed rule.

ORGANIC FOODS MUST:

1. Use as one of the criteria in selection of organic materials and methods the preferences and demands of the organic

consumer.

2. Rely on private certification to minimize USDA intervention and cost

3. Allow private certification organizations to have a higher standard like the state certification programs have.

4. Not price the small private certifiers and farmers out of organic foods industry.

5. Uphold the legal authority of NOSB to review and recommend all materials for inclusion on the National list. This is a

crucial element to provide a check and balance on the USDA.

6. Not allow the feeding of non-organic feed to livestock except in valid, temporary emergency situations.

1. Require livestock to have appropriate access to fresh air and the outdoors.

8. Prohibit antibiotics and hormones in organic livestock production.

9. Prohibit the feeding of animal and poultry by-products.

10. Follow the recommendations of the NOSB advisory board, which reflects the organic community.

II. Prohibit and never allow the use of genetically engineered organisms, irradiation and sewage sludge.

Organic Food is a partnership between the consumer and the farmer. It is not just an environmental label, but a label

representing this unique partnership, the consumers preferences must be respected.

(Additional comments below, and/or on attached sheet)

This is just a sample of my objections. Please review comments from the Coulee Region Organic Produce Pool (CROPP I

Organic Valley), The Organic Crop Improvement Association (OCIA), the Organic Trade Association (OTA), the Organic

Farmers Marketing Assoc., (OFMA), National Campaign for Sustainable Agriculture, Independent Organic Inspectors

Association (IOIA), Organic Materials Research Institute (OMRI). I support the their additional objections

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ANONYMOUS

Dear National Organic Program staff:

As a consumer of organically grown food, I am requesting that your proposed rules on organic food production be revised to reflect the advice and expertise of the National Organic Standards Board. I support the efforts to standardize organic certification and appreciate their open and inclusive process.

I urge you to support the integrity of organic agriculture and the meaningful choice I make as a

consumer. I want the final rules to prohibit all of the following products and practices for food labeled and/or sold as certified organic:

- Genetically engineered organisms and materials
- Sewage sludge ("biosolids"; section 205.22)
- Irradiation ("ionizing radiation")
- All inert ingredients unless they are rated by the EPA as "Generally Recognized As Safe."

(section 205.21 (d))

- Other comments: _____

I insist that the new federal standards for certified organic food maintain the integrity of organic farming practices, provide the safest, highest quality food possible, and guard human and environmental health.

1998

ANONYMOUS

Dear National Organic Program Staff: •

It is important to me to comment on the issue- regarding your proposed rules on organic food production. •

I WISH THAT THE STANDARDS FOR ORGANIC FOOD PRODUCTION REMAIN IN PLACE AND I SUPPORT THE RECOMMENDATIONS OF THE NATIONAL ORGANIC STANDARDS BOARD TO BE THE AUTHORITY ON THIS ISSUE.

, I WISH TO ALWAYS HAVE THE CHOICE TO BUY AND EAT FOOD FREE OF GENETICALLY ENGINEERED ORGANISMS, SEWAGE SLUDGE, AND IRRADIATION.

I ALSO I WISH TO KNOW WHAT GOES INTO ALL THE FOOD I EAT.

3/20/98

ANONYMOUS

I am extremely concerned about USDA's proposed NATIONAL ORGANIC PROGRAM (NOP) now

being submitted for public comment. The NOP Rules completely disregard the long established meaning and practices of organic agriculture and instead allow a huge number of injurious farming methods, synthetic substances, chemical adulterants and toxic constituents to qualify for a federal organic label.

These include but are not limited to irradiating food, using toxic sewage and industrial sludge as fertilizer, allowing genetically manipulated organisms in crops and food, permitting confinement factory farm operations and allowing synthetic food processing aids, adulterants and additives.

In fact, none of these or some 60 plus other allowances outlined in the NOP Rules have EVER been considered Organic or permitted as such in the marketplace by the existing state, national and international organic certification organizations. This program will completely gut the meaning of Organic

and allow spurious products in the marketplace. In addition, USDA's proposed excessive fee structure will automatically disenfranchise a large number of existing organically certified family farmers and will put many of the organic certification organizations out of business.

Further, under the bogus USDA Organic label, farmers, processors, and retailers will be prohibited from identifying products in the store based on production practices. Consumers, parents, personal health supporters, environmental advocates and many others will definitely lose their freedom of choice-and

they are not going to be happy about it.

Finally, USDA's actions regarding the formulation and execution of the NOP should be investigated immediately. They have definitely pulled a bureaucratic end run around the letter and intent of the original Organic Foods Production Act of 1990 (OFPA) and are in clear violation of a great number of its precepts. As such USDA is openly liable for legal action. USDA should be required to start over and come up with a valid NOP based on the OFPA mandates, accepted international standards, and the comments of the NOSB-- without giveaways to the special interests.

I look forward to your response at your earliest convenience.

1998

ANONYMOUS

I Want to express my concern about four practices potentially allowed under the new proposed standards

for the National Organic Program. I strongly feel that these practices should be prohibited when growing or processing food that will be labeled organic. These practices are:

The use of genetically engineered organisms (bio-engineered foods)

Genetically engineered organisms (also known as bio-engineered foods) should be prohibited when growing

or processing foods that will be labeled organic. Genetically engineered organisms can not be created in nature, and there is not yet enough scientific information available to judge the long term impacts that genetically engineered organisms would have on the environment.

The use of ionizing radiation (irradiation)

The use of ionizing radiation (also known as irradiation) should be prohibited when growing or processing

foods that will be labeled organic. The long term impacts of irradiation have not yet been fully studied and

there are effective alternatives to irradiation that are compatible with a system of organic farming and handling.

The use of municipal sludge (raw manure) as fertilizer

Municipal sludge should be prohibited in organic production because the long term impact on the environment

and human health is unknown at this time.

The use of antibiotics, other drugs and non organic feed in livestock production

Antibiotics, other drugs and non organic feed should be prohibited in organic production of livestock.

This issue is critical in determining the future of our environment and the safety of our food supply.

Thank you for your consideration.

1998

ANONYMOUS

In response to Docket #TMD-94-00-2, the Proposed National Organic Standards, I urge the USDA to retract its proposed rule and rewrite it to satisfy the requirements of the Organic Foods Production Act (OFPA), 7 U.S.C. 5.6501, and to reflect accurately the recommendations of the National Organic Standards Board (NOSB).

In addition, USDA should recognize NOSB's legal authority over determining which synthetic substances belong on the National List and should not introduce new ones that do not conform with existing organic standards. .

As they now stand, the Proposed National Organic Standards would severely weaken existing U.S. organic standards, and would stifle growth of the market for U.S. organic products. Consumers have come to expect a high level of healthfulness, quality and ecological integrity from organic produces, as indicated by the market's rapid growth. By weakening current standards and opening up the possibility that organic goods could be produced with generically engineered organisms, previously prohibited synthetic ingredients, municipal sewage sludge and ionizing irradiation, consumer trust in the organic label will diminish and farmers adhering to authentic organic standards will face unfair competition. In addition, international sales of U.S. organic products could be compromised because the Proposed Rule is weaker than generally accepted international organic standards.

Thank you for your prompt attention to this matter, and please keep me informed regarding USDA's further actions with respect to these regulations.

VITA

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Special Honors and Awards:

Best reviewer - Annual Midwest Academy of Management Conference, Strategy track,
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South Indian Term Abroad Scholarship, 2001

Dissertation Title:

Shifting Legitimizing Accounts in a Changing Institutional Field: An Analysis of the
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Major Professor: John Pearson, Jonathon Mote

Publications:

Sheridan, M. J., Cazier, J., & May, D. 2009. Leisure, wine and the internet: exploring the
factors that impact the purchase of wine online. International Journal of Electronic Marketing
and Retailing, 2(3): 284-297.