TEXAS
FARM CREDIT

June 19, 2014

Mr. Barry F. Mardock
Deputy Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

Dear Mr. Mardock:

As a director of Texas Farm Credit Services, I am personally committed to maintaining high standards of conduct, and I know my association is as well. First, I appreciate the opportunity to comment on FCA's recent proposed rule regarding Standards of Conduct. It would appear that the Agency has inadvertently designed a regulation that will discourage active farmers from running for the board of a Farm Credit institution.

The majority of the directors at Texas Farm Credit Services own full time agricultural operations including, but not limited to, farming a variety of crops such as corn, timber, soybeans, cotton, in addition to cow/calf operations as well as other ranching operations. Throughout the normal course of my business, I deal with other members of Texas Farm Credit Services or potential members of Texas Farm Credit Services on a regular basis.

Because of this, I find the transaction disclosure requirements in the Conflicts of Interest section of the proposed rule to be unduly burdensome and detrimental to my everyday business operations. I do not have a role in approving individual loans nor do I have any control or knowledge of the terms of individual loans. Therefore, it is unreasonable for me to be put in a position of having to know whether I am doing business with an association customer or not.

I routinely have business transactions with a wide variety of individuals, some of whom might be association customers. Even in instances when I know I'm dealing with an association customer, there is no conflict of interest since I have no role in making individual loan decisions.

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The proposed disclosure requirements would require me to report and obtain pre-approval of normal, everyday transactions within my farming operation. This is an unrealistic burden to place on directors who make their living in the agricultural arena.

I urge the FCA to substantially revise the proposed rule or consider withdrawing it. As drafted it is counterproductive, creating inappropriate, unreasonable standards that are inconsistent with modern farming operations. Thank you for your consideration.

Sincerely,

Marion V. Brown
P O Box 1281, Lufkin, TX 75901

Director
Texas Farm Credit Services