



The Bank of Landisburg

ESTABLISHED 1903

P.O. BOX 179 • LANDISBURG, PA 17040

October 23rd, 2014

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

Re: Eligible Investments for Farm Credit System Associations and Funding Banks

Dear Mr. Mardock:

Our bank is very concerned about the Farm Credit Administration's (FCA) regulatory proposal to "modernize" (as you put it) investment purposes for Farm Credit System (FCS) entities.

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Sincerely,

Patti L. McLaughlin  
Commercial Credit Officer

*Offices*



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Sincerely,

Wanda L. Cupp  
Director

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Sincerely,



Gerald K. Morrison  
Director

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James E. Magaro  
Director

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Robert O. Neidigh  
Director

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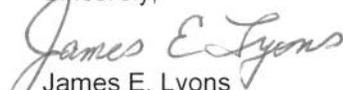
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James E. Lyons  
Treasurer of the Board

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Thomas W. Cook  
President & CEO

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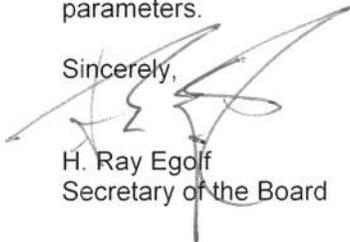
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H. Ray Egolf  
Secretary of the Board

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Chairman of the Board

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L. Jeffrey Mattern  
Director

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Charles E. Lupfer  
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If FCA does intend to approve these types of "investments" then you did not listen to the thousands of letters from bankers opposing your 2008 proposed rule. The rule states "no investment is ineligible if approved by FCA." Congress did not grant you an "anything goes" approval authority in the law that supersedes the Act's lending authorities.

All illegal investments now in FCS portfolios should be divested within six months. Investment portfolios should not exceed 10 percent of loan volumes, even if such volumes decline. Please withdraw the guidance memo and this proposal and reissue this proposal for comment after answering the questions raised above. FCA should not approve investments that exceed to scope of the Act's lending parameters.

Sincerely,

Nevin G. Rice  
Director

*Offices*



The Bank of Landisburg

ESTABLISHED 1903

P.O. BOX 179 • LANDISBURG, PA 17040

October 23rd, 2014

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

Re: Eligible Investments for Farm Credit System Associations and Funding Banks

Dear Mr. Mardock:

Our bank is very concerned about the Farm Credit Administration's (FCA) regulatory proposal to "modernize" (as you put it) investment purposes for Farm Credit System (FCS) entities. I am most concerned this proposal, combined with your recent "guidance memorandum" on investments and pilot projects, is not only confusing but backwards. FCA should withdraw the guidance memo until after this regulation is completed. The combination of the guidance memo and this regulation appear aimed at allowing FCA to approve virtually any type of investment. This is an egregious, self-serving power grab on FCA's part.

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Roger L. Blumenschein  
Loan Division Manager

*Offices*



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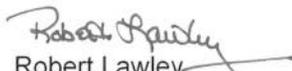
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Robert Lawley  
Chief Credit Officer

*Offices*