

November 10, 2014

Via electronic submission (reg-comm@fca.gov)

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

Subject: Proposed Rule on Institution Stockholder Voting Procedures

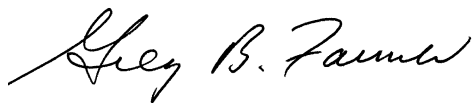
Dear Mr. Mardock:

Colonial Farm Credit appreciates the opportunity to comment on the Farm Credit Administration's (FCA) proposed rule regarding institution stockholder voting procedures.

While not specifically stated in the proposed regulation, paragraph four of Supplementary Information; III. Analysis; A. Section 611.340(a) states "If a tellers committee is used, the FCA proposes that only a small number of specifically authorized administrative employees...be allowed to assist..." and goes on to state that "Such employees could not be a part of management...". This language would prohibit the Association's corporate secretary (who in some institutions is a member of the Association's leadership team) from being involved in and insuring that the duties and responsibilities of the tellers committee are accurately performed. We request that the language be amended to state "With the exception of the corporate secretary, such employees could not be a part of management..." and that all references to administrative employees throughout the proposed regulations be amended to include language that will explicitly include the corporate secretary.

Again, we appreciate the opportunity to comment on the proposed institution stockholder voting rule. Please do not hesitate to contact us if you have questions concerning our comments.

Sincerely,



Greg B. Farmer
President and Chief Executive Officer