



Robert B. Engel
Chief Executive Officer

December 5, 2014

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

RE: Proposed Rule: Regulatory Capital, Implementation of Tier 1 / Tier 2
Framework

Dear Mr. Mardock:

CoBank, ACB submits this letter in support of the request by the Farm Credit System's Presidents' Planning Committee and the Farm Credit Council for the Farm Credit Administration ("FCA") to grant a 90-day extension to the public comment period on the proposed "Basel III" capital rules (the "Proposed Rule").¹ We are in complete concurrence with the reasons cited in the extension request. We feel strongly that an extension is essential for institutions in our district to provide well-informed, thoughtful and constructive comments on what is generally regarded as one of the most significant regulation projects in terms of the potential impacts on relations with our customer-members, the holders of System-wide debt securities and our external equity investor base. We also believe that the extension should broaden the audience of commenters and thereby provide the FCA Board access to a more diverse set of viewpoints on a wider range of topics covered by the Proposed Rule.

If you have any questions, please do not hesitate to call.

Respectfully submitted,

Robert B. Engel
Chief Executive Officer

cc: William Hoffman
Gary Van Meter
Charles Rawls

¹ We note that while the Proposed Rule's comment period is the same as the combined comment periods for the regulations implementing the existing surplus ratios, in that case the two comment periods were spread over 14 months. In addition, that regulatory project lacked the complexity found in the Proposed Rule and did not address the denominator of the capital ratio calculation.