

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

Dear Mr. Mardock:

Thank you for the opportunity to comment on FCA's recent proposed rule regarding Standards of Conduct. As a director of ArborOne Farm Credit, I am personally committed to maintaining high standards of conduct, and I know my association is as well. It would appear that the Agency designed this regulation with the goal of discouraging active farmers from running for the board of a Farm Credit institution. That just makes no sense and it needs to be fixed.

As a director, I find the transaction disclosure requirements in the Conflicts of Interest section of the proposed rule to be unduly burdensome, unnecessary and inappropriate. I do not have a role in approving individual loans or the terms of individual loans. 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.

The proposed disclosure requirements would require me to report and obtain pre-approval of transactions within my farming operation. This is an unrealistic burden to place on directors with no corresponding benefit. As a farmer, every minute of every day is filled with work and I do not have the luxury of time to call for pre-approval for every business transaction or business relationship I must make involving other individual farmers or businesses such as chemical companies. Pee Dee Peanut LLC contracts with 35 producers each year to purchase their peanuts. As a part owner of that business I disclose to ArborOne each of these producers.

I urge the FCA to revise substantially 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,

DuPree Atkinson  
1118 Willow Brook Place  
Mullins, SC 29574

