



MANHATTAN ADMINISTRATIVE
2009 VANESTA PLACE
MANHATTAN, KANSAS 66503
PHONE: 785-776-7144
TOLL FREE: 877-744-7144 FAX: 785-537-0116
E-MAIL: customer-care@frontierfarmcredit.com

May 12, 2014

Mr. Gary K. Van Meter
Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

Re: Standards of Conduct Proposed Rule

Dear Mr. Van Meter:

We are writing to respectfully request the Farm Credit Administration (FCA) extend the comment period on the proposed Standards of Conduct rule for an additional 60 days. This would allow us until July 21, 2014 to finalize comments that more accurately voice the concerns of our association and our board of directors on some of the wording contained in the proposal.

Ever since the proposal came out in late February, we have devoted staff and director time to fully understand and evaluate the proposal. We feel the impact of the proposed changes in this regulation to our directors and staff will be significant, but several pieces of the proposal are complex, and so we are still trying to fully assess the impact. Therefore, we respectfully request additional time to respond. This will allow our directors to become more fully informed and form a more accurate assessment of the proposed changes. We feel this will allow us to provide more concise and constructive feedback to the FCA. In addition, we feel the existing regulations are fairly robust already and so providing additional comment time adds little if any risk to this subject area.

Thank you for your consideration of our request. We look forward to working with you on the proposed changes.

Sincerely,

A handwritten signature in black ink that reads "Douglas D. Hofbauer". The signature is written in a cursive style.

Doug Hofbauer
Chief Executive Officer