



1ST FARM CREDIT SERVICES.

YOUR FIRST CHOICE

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May 14, 2014

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

Subject: Proposed Rule – Standards of Conduct

Dear Mr. Van Meter:

The Proposed Rule regarding Standards of Conduct for the Farm Credit System was published in the Federal Register for public comment on February 20, 2014, with a comment period scheduled through May 21, 2014. We join other Farm Credit System institutions, including the Farm Credit Council, in respectfully requesting a 60 day extension of the comment period.

Since the publication date, we have participated with System workgroups, along with other Farm Credit System institutions, to review and assess the impact of the proposed regulations in order to provide comments to the Farm Credit Administration staff and board members. Our board of directors is highly engaged in this review process and would be in a position to provide better and more meaningful input to the Agency on the proposal with additional time for review and discussion among our directors.

We appreciate your consideration of this request.

Sincerely,

Barbara Kay Stille
EVP – Operations & General Counsel

cc: Gary Ash
Jeff Austman