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May 12, 2014

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

**RE: Standards of Conduct and Referral of Known or Suspected Criminal  
Violations; Standards of Conduct – Proposed Rule  
RIN 3052-AC44**

Dear Mr. Van Meter:

ArborOne Farm Credit also wishes to express its support for The Farm Credit Council's May 8, 2014 request for an extension of the comment period for the Proposed Rule regarding Standards of Conduct for Farm Credit System institutions. We echo The Farm Credit Council's statement that the additional time will provide a valuable opportunity for detailed comments on the "real world" impacts of the proposed regulations at our as well as others' Association board member level.

The proposed amendments to the Standards of Conduct regulations will have a significant bearing on the business operations and the member interactions within the Farm Credit System. ArborOne believes that an extension in the rulemaking process will only serve to provide the System with a well considered final rule. We, therefore, also respectfully request that the Farm Credit Administration grant a 60-day extension for the comment period on the Proposed Rule on Standards of Conduct.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kathy S. Heustess".

Kathy S. Heustess,  
President and Chief Executive Officer