



**Farm Credit Services of America**  
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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, VA 22102-5090

Subject: Proposed Rule - Standards of Conduct

Dear Mr. Van Meter:

I respectfully request that the May 21, 2014 comment period for the Proposed Rule regarding Standard of Conduct for Farm Credit System (FCS) institutions published in the Federal Register for public comment on February 20, 2014 be extended by 60 days.

This request is made to allow System Institutions additional time to consider the impact of the modernization of the regulations on existing certification, reporting and prior approval responsibilities of employees, directors, agents and others who provide services to System Institutions. In addition, we are in the process of evaluating the overall impact on the Board, the Standards of Conduct Officer and/or other resources to comply with the approval, investigation, monitoring, and reporting contemplated in the proposed rule.

Thank you for your consideration.

Sincerely,

Scott Coziahr,  
Senior Vice President and General Counsel