



Farm Credit

Farm Credit of Central Oklahoma
Mission & Georgia, P.O. Box 910
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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

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 to finalize comments that more accurately voice the concerns of our association and our board of directors.

Farm Credit of Central Oklahoma, along with various national and regional work groups, have dedicated hundreds of hours of staff and director time evaluating the effects of the proposed regulation and developing comments as requested by FCA. The complexity of the regulation, the drastic changes proposed for director's, and the overall impact on the Farm Credit system dictate participation by all associations in this comment period. Management and boards are dedicated to high standards of conduct and seek to present only the highest levels of ethics. More time will allow additional director input and can only serve to strengthen the final regulation. Current standard of conduct regulation is extensive, has served the system well for many years and will continue to provide extensive, effective standard of conduct regulation for the Farm Credit System. An additional 60 days for comment creates no additional risk to the system.

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

Sincerely,

Blake Byrd
Chief Executive Officer

BB/smr