



5052 Highway 90 East / Marianna, FL 32446
P.O. Box 7000/Marianna FL 32447-7000
800-527-0647 / 850-526-4910 / fax 850-482-6597
email marianna@farmcredit-fl.com / web www.farmcredit-fl.com

October 23, 2018

Barry F. Mardock, Deputy Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

RE: Proposed Rule – Organization; Definitions; Eligibility Criteria for Outside Directors (12CFR Part 611 and 619)

Dear Mr. Mardock:

Farm Credit of Northwest Florida, ACA appreciates the opportunity to comment on the proposed rule as referenced above. As this Association's ability to garner comments from individual directors was hindered by Hurricane Michael, I, as President/CEO would like to offer my comments on behalf of the Association and the Board of Directors in regard to this proposed rule. We have reviewed both the AgFirst Farm Credit Bank and Farm Credit Council comment letters and are in general support of their remarks. The Board and I take seriously the importance of protecting the reputation of the Farm Credit System and conducting business with high standards of integrity and ethics. We would respectfully ask you to consider the comments of AgFirst Farm Credit Bank and the Farm Credit Council when preparing the final rule so that our shared goal to be a trusted financing resource for future generations is not hindered.

Sincerely,

A handwritten signature in black ink that reads "Ricky K. Bitner". The signature is written in a cursive, flowing style.

Ricky K. Bitner
President/CEO, Farm Credit of Northwest Florida

Helping Rural America Grow