

October 23, 2018

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

Re: Proposed Rule – 12 CFR Parts 611 and 619 – RIN 3052 – AC97; Definitions; Eligibility Criteria of Outside Directors; 83 Federal Register 42807-42810 (August 24, 2018)

Dear Mr. Mardock:

I, Hugh Harris, am currently in my fourth year as an outside director from the legal field. I also was raised on a farm, live the rural life, and hold high regard for farmers and the farming industry. Alabama Farm Credit, and myself personally, have invested time and training into this position. I am also the current Chairman of the Compensation Committee of Alabama Farm Credit.

After I became a director my son was in need of a farm loan, and I referred him to Alabama Farm Credit. Under Alabama Farm Credit's Standard of Conduct and divisions in the loan process, I did not have any further association with the loan. The proposed rule change would keep an outside director from referring a family member to Farm Credit for a farm loan, or if he did he would be forced to resign his position.

Due to the time, money and effort to train a director, it would not seem to be advisable to disqualify an outside director from having an immediate family member as a "stockholder". I am unable to see how an immediate family member could influence my position any more than any other stockholder. There are numerous controls in place to protect the integrity of the Board of Directors and the proposed rule change would appear to be detrimental to the Board.

Respectfully,

Hugh C. Harris

Outside Director- Alabama Farm Credit