



Administrative Office
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November 15, 2019

Mr. Barry F. Mardock
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

RE: RIN 3052-AD 35 Investment Eligibility, 84 FR 49069, September 18, 2019

Central Texas Farm Credit would like to take this opportunity to comment on the Farm Credit Administration's (FCA) Proposed Rule published in the September 18, 2019 Federal Register (Proposed Rule) focusing on the matters associated with the ability of Farm Credit System (FCS or System) associations to purchase and hold loans or portions of loans that non-FCS lenders originate and sell in the secondary market, and that the United States Department of Agriculture (USDA) unconditionally guarantees or insures.

The FCA's action to rectify the issue created with the adoption of the final rule adopted on May 10, 2018 which prohibited System associations from participating in the secondary market for loans that are guaranteed by a U.S. government entity is appreciated. On this point, we also encourage the FCA to quickly act to adopt this Proposed Rule.

We also believe the FCA should consider Farm Credit Council's proposal to authorize associations to purchase "obligations" as defined in Sections 2.2(11) and 2.2(17) of the Farm Credit Act or return to the definition stated in the 2014 Proposed Rule on the same subject.

At this time, we would like to express our full approval and support for the FCC's opinions stated in its response letter. We appreciate the opportunity to respond to the current Proposed Rule and encourage the FCA to adopt this rule promptly.

Sincerely,

Boyd J. Chambers
Chief Executive Officer
Central Texas Farm Credit