

March 23, 2020

Submitted via email to: req-comm@fca.gov

Mr. David Grahn
Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

RE: Amortization Limits— RIN 3052-AC92 Federal Register 85 (January 23, 2020)

Dear Mr. Grahn:

AgriBank, FCB (“AgriBank”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) Proposed Rule on Amortization Limits on PCA loans for the Farm Credit System published in the January 23, 2020 Federal Register.

Thank you for taking into account the Farm Credit Council’s recommendation to update PCA loan authorities by repealing the regulatory requirements as set forth in the above referenced proposed rule. AgriBank is supportive of the proposal to repeal regulatory authorities that impose amortization limits on PCA loans and require associations to address loan amortization in their credit underwriting standards.

We appreciate the opportunity to comment and FCA’s consideration of our comment letter. We would be happy to meet with FCA to discuss our comments or provide any additional information that FCA may deem helpful. If you have questions or require additional information, please contact me.

Sincerely,



Barbara Kay Stille
Chief Administrative Officer and General Counsel

