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July 14, 2021

Mr. Kevin J. Kramp
Director, Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

Re: Proposed Rule – 12 CFR Part 614 – RIN 3052-AC94; Collateral Evaluation Requirements; 86 Federal Register 27308-27323

Dear Mr. Kramp:

Farm Credit of Northwest Florida, ACA appreciates the opportunity to respond to the FCA's request for comments concerning the proposed rule on Collateral Evaluation Requirements ("Proposed Rule"), published in the May 20, 2021 *Federal Register*. We have reviewed and support the comments being submitted by the Farm Credit Council ("FCC") on behalf of the System institutions. Since those comments have been provided to you by FCC, we will not restate them in this letter.

We appreciate the need to ensure that existing regulations continue to provide safe and sound guidance for System institutions. However, we have concerns that the Proposed Rule makes collateralization and compliance more difficult, costlier, and more inconvenient. As a smaller institution, the Proposed Rule has an even more significant impact on our ability to remain competitive and satisfy our mission of providing reliable, cost-effective lending to eligible borrowers and the agricultural community.

Therefore, we respectfully urge the FCA to withdraw the Proposed Rule in its entirety. We trust our comments and others received from across the System will assist FCA in its consideration of the Proposed Rule. Again, we thank you for the opportunity to comment on the Proposed Rule.

Sincerely,

A handwritten signature in black ink that reads "Ricky K. Bitner".

Ricky K. Bitner
President/Chief Executive Officer