



July 16, 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:

Southwest Georgia Farm Credit, ACA appreciates the opportunity to comment on the Farm Credit Administration's ("FCA") Proposed Rule regarding Collateral Evaluation Requirements that was published in the May 20, 2021 *Federal Register* (the "Proposed Rule").

Southwest Georgia Farm Credit has reviewed and discussed the Proposed Rule with its management, its Board of Directors, certain of its employees and agents, and its funding bank, as well as the Farm Credit Council. The Association has reviewed the background of the existing regulations, the Preamble to the Proposed Rule, relevant FCA-published materials, materials and authorities relevant to other lending institutions regarding such matters, and authorities relating to the interpretation and application of laws and regulations.

Based on the above, Southwest Georgia Farm Credit's own internal guidance, the mission and the cooperative principles of the Farm Credit System, and the desire (and need) to provide reliable, accessible, and affordable access to financing for the agricultural and/or rural needs of its borrowers and potential borrowers, Southwest Georgia Farm Credit fully supports and adopts the comments on the Proposed Rule submitted by the Farm Credit Council ("FCC") and by AgFirst Farm Credit Bank ("AgFirst"). Such comments are incorporated by reference as if fully set forth in this letter.

For at least the reasons stated herein, Southwest Georgia Farm Credit respectfully requests that the FCA withdraw the Proposed Rule and engage with System institutions in a mindful and thorough discussion to agree upon collateral evaluation requirements that aligns with the stated objectives of the Proposed Rule and that support Farm Credit's ability to serve its customers and fulfill its mission. Again, we appreciate your consideration of our constructive comments on the Proposed Rule.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paxton W. Poitevint".

Paxton W. Poitevint
Chief Executive Office