



# First South

## Farm Credit

### Corporate Office

Three Paragon Centre • Suite 100  
574 Highland Colony Parkway • Ridgeland, Mississippi 39157  
(601) 977-8381 • fax (601) 977-8388 • FirstSouthLand.com

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-ACA-94  
Collateral Evaluation Requirements  
86 Federal Register 27308-27323

Dear Mr. Kramp:

First South Farm Credit, ACA is the Farm Credit System's largest lender for production agriculture and long term rural real estate loans in Alabama, Mississippi and Louisiana.

First South Board and management understand the benefits of financial regulations as it relates to safety and soundness and risk to our association. However, the First South Board has an obligated responsibility to our borrower stockholders to assess risk factors as well as regulations that have a negative impact on agricultural producers, agribusiness and the customers we serve.

Below are some, but not limited to, complexities that would adversely impact direct lender associations:

- 1) Implies compliance confusion for farm credit associations, their appraisers and chattel evaluators
- 2) Imposes needless cost and burdens to the association and its borrower stockholders
- 3) Goes beyond state and federal law requirements and is more restrictive than that of competing financial institutions
- 4) Impedes loan closings in a timely manner that could have a detrimental effect on our customer base

First South supports comments by the Farm Credit Council and requests FCA withdraw this rule as proposed.

Respectfully,

John W. Barnard  
Chief Executive Officer

Sells J. Newman  
Senior Vice President  
Legislative Affairs

James F. Martin, III  
Chairman of the Board

Thomas H. Nelson, Jr.  
Vice Chairman of the Board

FIRST SOUTH FARM CREDIT

Serving Rural America in Alabama, Louisiana and Mississippi