



119 East Third Street, Suite 200 • Little Rock, AR 72201 • (501) 210-4000 or 1 (800) 299-2290 • FAX (501) 374-2627 • agheritagefcs.com

July 19, 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,

As a Farm Credit System director, I am writing to express my concern that FCA's recently proposed rule on collateral evaluation will have a negative impact on the agricultural producers, agribusinesses, and other customers we serve.

The rule would slow the loan-making process and place needless cost and burden on producers without any real benefit to the safety and soundness of Farm Credit System institutions.

I respectfully ask FCA to withdraw the rule and engage Farm Credit System representatives in a constructive dialog designed to identify an approach to collateral evaluation requirements that is farmer friendly, recognizes modern practices, and simplifies the credit delivery process. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dwain Morris". The signature is written in a cursive, flowing style.

Dwain Morris
AgHeritage Farm Credit Services
Board Chairman