



L. Wayne Kirby
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Mechanicsville, VA 23116

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:

As a Farm Credit System director, I am writing to express my support for the comment letters submitted by the Farm Credit Council, AgFirst Farm Credit Bank and Colonial Farm Credit, ACA regarding FCA's recently proposed rule on collateral evaluations. I have concern that the Proposed Rule 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,

L. Wayne Kirby, Director

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LWK/ag