

July 15, 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:

Texas Farm Credit Services appreciates the opportunity to comment on the Farm Credit Administration's (FCA) Proposed Rule regarding Collateral Evaluation Requirements that was published on May 20, 2021 (the "Proposed Rule").

We fully support the comments made by the Farm Credit Council (FCC) on behalf of the System in response to the Proposed Rule. While we agree with many of the goals and objectives stated by the FCA for the Proposed Rule, for the reasons more fully explained in the FCC's comment letter, we do not believe that the Proposed Rule as currently presented satisfies these goals and objectives and that the Proposed Rule presents a number of compliance issues for Farm Credit System institutions and their appraisers and chattel evaluators, imposes costs and burdens on System customers and borrowers, and causes unnecessary confusion and inconsistency within FCA regulations and related authorities.

We appreciate the FCA's review of the existing collateral evaluation regulations for opportunities to improve the organization and readability of the regulations, as well as to expand authorities on using various sources of appraisers and evaluators and automated valuation tools, however for the reasons set forth in the FCC comment letter we do not support the Proposed Rule as currently presented.

Accordingly, we respectfully request that the FCA withdraw the Proposed Rule, or alternatively, we request an opportunity for System representatives and industry experts to meet with FCA to explore possible improvements that could be made to existing guidance to accomplish the stated objectives of the Proposed Rule and/or to further safety and soundness with regard to appraisals and collateral evaluations in another way.

Thank you again for the opportunity to comment on the Proposed Rule, and we hope that our comments herein, as well as those submitted by the FCC and other System institutions, will assist the FCA in reevaluating the Proposed Rule.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Mark Miller  
Chief Executive Officer