

November 19, 2021

Submitted via email to: [reg-comm@fca.gov](mailto:reg-comm@fca.gov)

Mr. Kevin Kramp  
Director, Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, Virginia 22102-5090

**RE: Bank Liquidity Reserve— RIN 3052-AD44 Federal Register 86 (September 3, 2021)**

Dear Mr. Kramp:

AgriBank, FCB (“AgriBank”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) Advance Notice of Proposed Rulemaking (“ANPRM”) about whether and how FCA should revise its liquidity regulatory framework for Farm Credit System banks as published in the September 3, 2021 Federal Register.

AgriBank reviewed the Farm Credit Council’s (“FCC”) bank liquidity reserve comment letter, and fully supports it. AgriBank was a participant in the System Workgroup referenced in the FCC comment letter, which met over the course of several months to review and discuss the Proposed Rulemaking, the existing regulations, and authorities relevant to other regulated lending institutions. We agree with and support the comments offered by the FCC in its letter, and AgriBank strongly supports the FCC and Workgroup conclusions that FCA’s current bank liquidity reserve regulatory framework is comprehensive, is working as intended, and effectively supports the safety and soundness of System banks.

We appreciate the opportunity to comment and FCA’s consideration of our comment letter. We would be happy to meet with FCA to discuss our comments or provide any additional information that FCA may deem helpful. If you have questions or require additional information, please contact me.

Sincerely,



Barbara Kay Stille  
Chief Administrative Officer and General Counsel

