

January 18, 2022

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

Re: Proposed Rule – 12 CFR Part 628 – RIN 3052-AD42; *Risk Weighting of High Volatility Commercial Real Estate (HVCRE) Exposures*; 86 Federal Register 47601-47607

Dear Mr. Kramp:

Compeer Financial, ACA (“Compeer”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) proposed rule regarding risk weighting of high volatility commercial real estate. We participated in the Farm Credit System effort led by the Farm Credit Council (“FCC”) to evaluate proposed rule and draft the letter submitted by the Council. Compeer fully supports the FCC’s comment letter and urges FCA to amend the proposed rule consistent with the recommendations contained in the FCC’s letter.

Sincerely,



Shannon Ganschow
VP Enterprise Risk Management
