12501 Lakefront Place, Louisville, KY 40299

(502) 420-3700 | e-farmcredit.com

January 26, 2022

VIA EMAIL: reg-comm@fca.gov

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 628 – RIN 3052-AD42; *Risk Weighting of High Volatility Commercial Real Estate (HVCRE) Exposures*; 86 Federal Register 47601-47607

Dear Mr. Kramp:

Thank you for the opportunity to comment on the above-referenced Proposed Rule published in the Federal Register on August 26, 2021, addressing risk weighting of credit facilities that are defined as high volatility commercial real estate exposures under that Proposed Rule.

In Response to this Proposed Rule on Risk Weighting of High Volatility Commercial Real Estate (HVCRE) Exposures, Farm Credit Mid-America, ACA (“Farm Credit Mid-America”) supports the comment letter submitted by the Farm Credit Council (“FCC”) on January 19, 2022. Farm Credit Mid-America participated in the workgroup referenced by FCC in its letter and worked with other System institutions, over several months, to provide feedback to FCC on the Proposed Rule. Farm Credit Mid-America shares the concerns raised by the FCC in its comment letter and supports the requests for clarification, and the additional suggestions made by FCC, for the Farm Credit Administration’s consideration. We respectfully request that the Farm Credit Administration use its discretion to amend the Proposed Rule to address FCC’s comments prior to issuing a Final Rule.

We appreciate the opportunity to comment on the Proposed Rule and the Farm Credit Administration’s willingness to consider this comment letter and the FCC’s comment letter.

Sincerely,



Steve Zagar

Senior Vice President, Chief Financial Officer