



FARM CREDIT EAST, ACA

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Mr. Barry F. Mardock  
Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, Virginia 22102-5090  
[reg-comm@fca.gov](mailto:reg-comm@fca.gov)

**RE: Advance Notice of Proposed Rulemaking – Young, Beginning, and Small Farmers and Ranchers– RIN 3052-AD32/ Federal Register 84, No. 35 (February 21, 2019)**

Dear Mr. Mardock,

I am writing as EVP and General Counsel of Farm Credit East, ACA in regard to the Farm Credit Administration's ("FCA") advance notice of proposed rulemaking related to Young, Beginning, and Small Farmers and Ranchers ("YBS"). Farm Credit East is proud of the system's efforts in this important area. As you may know, a system workgroup was formed and over the past few months, numerous conversations were held to develop a joint and unified system response.

This letter shall serve as acknowledgment that Farm Credit East fully supports the recommendations in the letter from the Farm Credit Council which outlines issues associated with the collection and reporting of data from the Farm Credit System with respect to service to young, beginning and small farmers, ranchers and producers or harvesters of aquatic products. In sum, Farm Credit East strongly supports that YBS reporting remain current, accurate, and meaningful and that the current categories of reporting are consistent with the Farm Credit Act. Simply put, regulatory changes are not necessary. If changes are to be made, updating guidance (i.e. the Bookletter BL-040 Revised) is the appropriate way to implement any needed clarification.

Thank you.

Sincerely,

Alena Gfeller  
EVP and General Counsel