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May 21, 2019

Mr. Barry F. Mardock
Deputy Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

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:

CoBank ACB appreciates the opportunity to comment on the Farm Credit Administration's (FCA or Agency) Advance Notice of Proposed Rulemaking published in the February 21, 2019 Federal Register (Advance Notice) addressing issues associated with the collection and reporting of data from the Farm Credit System (FCS or System) with respect to service to young, beginning and small (YBS) farmers, ranchers and producers or harvesters of aquatic products (YBS Farmers).

We fully support the comments made by the Farm Credit Council (FCC) on behalf of the System. The System has a long-standing record of supporting YBS Farmers through its lending programs and related services. Many of these efforts are not easily quantified by reporting the numbers and volume of YBS customers, though significant qualitative information is currently provided to assist in the analysis of the effectiveness of YBS program. We recognize the challenges in the current reporting scheme, but as discussed in the FCC comment letter, we are not supportive of the seven category proposal as it adds complexity and cost with minimal benefit. We believe current and ongoing efforts to enhance reporting will provide more meaningful information over time and should not be stalled by adding complexity to the current reporting processes.

We acknowledge that the current FCA Bookletter (BL040-Revised) could be updated in several areas and believe the bookletter is the most flexible way to establish a reporting process which needs to evolve over time. The current regulations fairly present the statutory requirements and ensure the System maintains its focus on YBS Farmers.

We thank you for the opportunity to comment and hope that our comments, as well as those submitted by the FCC and other System institutions, will assist the Agency. If you have any questions, please do not hesitate to contact me.

Sincerely,

Andrew Jacob
Chief Regulatory, Legislative and Compliance Officer