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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)

Premier Farm Credit, on behalf of its members, appreciates the opportunity to comment on the Farm Credit Administration's (FCA) Advance Notice of Proposed Rulemaking published in the February 21, 2019 Federal Register (Advance Notice) addressing issues associated with the collection and reporting of the data from the Farm Credit System with respect to service to young, beginning and small (YBS) farmers, ranchers and producers of aquatic products (YBS Farmers). Specifically, we would like to offer our support of points raised in the comment letter submitted in respect to this issue by Charles Dana, representing the Farm Credit System.

As referenced in the above-mentioned letter, Premier Farm Credit and the Farm Credit System are proud of our robust outreach efforts to serve YBS Farmers. We feel that the current categories of reporting are generally appropriate, and the move toward new reporting buckets would increase programming and administrative burden with minimal benefit. Additional complexity will not improve understanding of the programs that are designed to serve this important market segment. As so many factors can impact results, we feel it is important to also focus on an association's efforts to serve its market, specifically the YBS segment. Additionally, it would be helpful to align with the USDA threshold of \$350 thousand in sales as a definition for small farmers.

Again, we are in support of all points made in the letter submitted by Charles Dana on behalf of the Farm Credit System and are proud of our commitment to YBS Farmers as demonstrated consistently on both qualitative and quantitative grounds. We appreciate the opportunity to comment and thank you for your attention to this matter. Please do not hesitate to contact me if we can be of further assistance.

Sincerely,

Wayne A. Midcap, Board Chairman
Premier Farm Credit, ACA