

May 22, 2019

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

Re: ANPR – Young, Beginning and Small Farmers and Ranchers (RIN 3052-AD32)

Dear Mr. Mardock:

Compeer Financial, ACA (“Compeer”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) advance notice of proposed rulemaking related to the collection and reporting of data regarding young, beginning and small (YBS) farmers and ranchers. We are also aware of the comments being submitted by the Farm Credit Council and wish to express our support for those comments.

Compeer is proud of its history of serving all eligible and creditworthy producers and our board of directors and management team have implemented a YBS-targeted program that seeks to assure we are providing maximum flexibility for YBS producers. In addition to our lending programs focused on YBS producers, we also provide grant funding and educational programs focused on helping YBS producers increase their business and financial skills.

Compeer certainly recognizes the importance of system reporting of YBS-related activities, but also believes the data does not, and cannot, tell a complete story. As a relationship-based lender, Compeer seeks to be more than just a source of funds for YBS producers. We seek to help YBS producers succeed in all aspects of their operation. While our primary role will often be providing funds, we also believe making sure YBS producers have access to professionals both within our organization and other third-party professions allows us to more fully fulfill our YBS mission.

As noted above, Compeer joins the Farm Credit Council in its comments and offers the following comments on a few of FCA’s questions in its advance notice of proposed rulemaking.

Question 2 – Compeer believes the number of loans provides the best quantitative metric for assessing support of the system’s YBS mission. While loan volume is an important metric, in many cases YBS lending activity will by definition involve smaller producers or producers just beginning to establish and grow their operation. Thus, thus loan volume metric can be misleading and is not on its own an appropriate metric of an institution’s commitment to its YBS mission.

Question 3 – Compeer does offer leasing products to YBS producers and believes a YBS producer who seeks lease financing should be counted in the reporting.

Question 15 – Compeer believes the “normally generates” test is appropriate. This language helps avoid or mitigate against anomalous situations that could inappropriately include or exclude a producer in a YBS category.

Question 21 – If any borrower meets a YBS definition, the loan should be included when reporting on that definition. To exclude a loan because one or more of the borrowers does not meet a definition would result in underreporting of the true nature of a system institution’s YBS activity.

Question 22 – An entity whose owners or members meet a YBS definition should be included in the reporting.

Question 23 – The decision about whether to a loan meets a YBS definition should be made at the time the loan is booked.

Again, Compeer recognizes the importance of quantitative reporting but strongly believes it cannot tell the full story of its, or the rest of the Farm Credit System’s, commitment to YBS farmers and ranchers. Compeer supports efforts to bring greater clarity to the current reporting process consistent with the comments offered herein and those offered by the Farm Credit Council.

Sincerely,



Kaye Compart  
Compeer Financial, ACA - Board Member  
Compeer Financial, ACA - YBS Committee Chair

