

August 10, 2022

Ms. Autumn R. Agans
Deputy Director, Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

Re: Proposed Rule – 12 CFR Parts 614 and 620 – RIN 3052-AD54; Loan Policies and Operations; 87 Federal Register 36261-36266

Dear Ms. Agans:

Alabama Farm Credit, ACA appreciates the opportunity to comment on the Farm Credit Administration's ("FCA") Notice of Proposed Rulemaking regarding Loan Policies and Operations that was published in the *Federal Register* on June 16, 2022 ("YBS Proposed Rule").

We fully support the comments made by the Farm Credit Council ("FCC") on behalf of Farm Credit System institutions ("System") in response to the YBS Proposed Rule. While we agree with the goals stated by the FCA for the YBS Proposed Rule, for the reasons more fully explained in the FCC's comment letter [and herein], we do not believe that the YBS Proposed Rule provides any additional means for accomplishing these goals, but rather only adds administrative burden that will cost time and money which would be better utilized through direct support for young, beginning, and small farmers and ranchers ("YBS").

In addition, to supporting the position of the FCC regarding the YBS Proposed Rule, Alabama Farm Credit submits the following comments for your consideration:

- Alabama Farm Credit strives each year to be increasingly intentional in YBS involvement. Most recently, the association has established a Young Farmers Advisory Board for the purpose of creating longstanding relationships between young producers and the association by providing the opportunity to network, understand, and explore perspectives. By doing so, the association has daily access to committee members who are willing to collaborate and share immediate needs of their peers.
- The association utilizes underwriting criteria that allows for concessions to ease the financial burden of start-up operations and aid YBS lending while not placing the Association's capital at significant risk.

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- Additionally, the association is active in participation and sponsorship of various annual YBS related events and programs not limited to the following:
 - Young Leaders Conferences
 - Alabama Department of Agriculture & Industries Health Conference
 - Alfa Young Farmers Programs and Youth Conferences
 - Alabama Poultry and Egg Programs
 - Local 4-H Programs
 - Auburn University Ag Programs

Alabama Farm Credit believes that adding additional administrative tasks to satisfy the proposed requirements will take time and resources away from our already successful YBS program. We would find more benefit in using the time, money, and human capital to continue and further refine our outreach efforts as stated above.

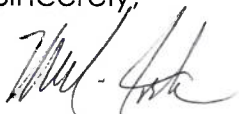
We appreciate the FCA's review of the existing regulations for opportunities to increase direct lender associations' YBS activity, however for the reasons set forth in the FCC comment letter as well as our desire to put all energy into current efforts, we do not support the YBS Proposed Rule as currently presented.

Accordingly, we respectfully request that the FCA withdraw the YBS Proposed Rule, or alternatively, we request an opportunity for System representatives and industry experts to further meet with the FCA to explore possible additional efforts which could be undertaken to meet the Agency's expectations.

Thank you again for the opportunity to comment on the YBS Proposed Rule, and we hope that our comments herein, as well as those submitted by Farm Credit Council and other System institutions, will assist the FCA in reevaluating the YBS Proposed Rule.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Mel Koller
President and CEO