



June 24, 2022

Mr. Kevin J. Kramp
Director, Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090

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

Dear Mr. Kramp:

On behalf of the Farm Credit System, Farm Credit Council (“FCC”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) Notice of Proposed Rulemaking (“NPRM”) regarding Loan Policies and Operations (“YBS Proposed Rule”) that was published in the *Federal Register* on June 16, 2022.

Given the scope and expected ramifications of this NPRM, FCC respectfully requests a comment extension of 60 days (beyond the current comment deadline of August 15, 2022) to appropriately respond to the agency’s request for public comment. We believe FCA will be better served with more complete feedback from the Farm Credit System given the anticipated impact to YBS programs around the country.

Thank you in advance for your time and consideration in reviewing this request. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Robert P. Boone III".

Robert Paul Boone, III
Senior Vice President & General Counsel
Farm Credit Council