

September 15, 2022

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

Re: Notice of Proposed Rulemaking - 12 CFR Part 609 — RIN 3052-AD53; *Cyber Risk Management*;
87 Federal Register 45281-45284

Dear Ms. Agans:

Idaho AgCredit appreciates the opportunity to comment on the Cyber Risk Management proposed rulemaking described above. Idaho AgCredit has reviewed and agreed with the Farm Credit Council response. Please refer to the Farm Credit Council letter for examples and detailed suggestions in regard to the following key points:

1. The Proposed Rule does not align with the “principles based” approach suggested by the FCA.
2. The Proposed Rule uses qualitative language without clear definitions.
3. The Proposed Rule does not explain what it means for programs to be “consistent with the size and complexity of the institution”.
4. The Proposed Rule does not consider the varied role and responsibilities for institutions receiving information technology services from a service provider.
5. The Proposed Rule does not reference any specific industry standards or applicable laws or regulations.
6. The Proposed Rule’s incident management requirements are unclear and impractical. More specifically:
 - a. The Proposed Rule uses, but does not define, the word “incident”.
 - b. The Proposed Rule requires an insufficient timeline to report an incident.
 - c. The Proposed Rule does not define “known visitors” or “potential customers”.
 - d. The Proposed Rule requires detailed procedures for Security Event identification, containment and resumption.
7. The Proposed Rule vendor management requirements are not feasible.
8. The Proposed Rule’s vulnerability management requirements are not feasible.
9. The Proposed Rule’s business plan requirements do not align to established business processes.
10. Various provisions of the Proposed Rule are ambiguous and open to multiple interpretations.

Additionally, Idaho AgCredit offers a few additional comments:

1. While technology planning and budgeting deserves to be mentioned in the business plan, the specific requirements for how information should be presented and where (business plan, technology plan or both) is best left of to the institution, rather than being dictated in a one-size fits all manner.
2. Incident Response planning varies greatly by institution and by incident, since the technologies used and expertise available also varies greatly. The final rule should allow institutions more flexibility in defining incident response planning more broadly rather than specifically. Broad based incident responses provide the flexibility needed to adapt to constantly changing technology and threats to technology. Requiring specific incident plan responses to individual

potential threats is both time consuming and ultimately not satisfactory, especially to new threats that may not be envisioned when the plans are created. Our institution uses a broad based approach in which we involve knowledgeable individuals on each incident response team who can quickly compile the best practices and actions that are necessary for any situation and take immediate actions.

3. The proposed rule should be pulled back, reworked, and represented in the future for additional comments.

Sincerely,



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