



September 22, 2022

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

RE: Proposed Rulemaking - 12 CFR Part 609 – RIN 3052-AD53; Cyber Risk Management; 87 Federal Register 45281-45284

Director Agans:

Northwest Farm Credit Services (Northwest FCS) appreciates the opportunity to comment on the Farm Credit Administration's (FCA) Proposed Rulemaking published in the July 22, 2022, Federal Register regarding Cyber Risk Management (Proposed Rule).

Northwest FCS is supportive of the FCA's efforts to replace the current information technology regulations with a principles-based Cybersecurity Risk Management framework. However, the Proposed Rule in its current form appears overly prescriptive, ambiguous, and inconsistent with modern, industry standard frameworks.

Northwest FCS participated in the Farm Credit System (System) Cybersecurity Workgroup (workgroup) to review and evaluate the Proposed Rule in coordination with the Farm Credit Council (FCC). For reasons set forth within the FCC's comment letter, Northwest FCS respectfully requests that the Proposed Rule be modified to create a true principles-based approach that will hold up over time in a rapidly changing operating environment and allow System institutions to leverage modern frameworks based on industry standards, customized for each institution's risk environment.

Please contact Colton Telford (colton.telford@northwestfcs.com or 509.590.3846) if you wish to discuss our comments.

Respectfully submitted,

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