

September 26, 2022

Ms. 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:

AgTexas Farm Credit Services appreciates the opportunity to comment on the Farm Credit Administration's ("FCA") Notice of Proposed Rulemaking regarding Cyber Risk Management ("Proposed Rule") that was published in the *Federal Register* on July 28, 2022.

We fully support the comments made by the Farm Credit Council ("FCC") on behalf of Farm Credit System institutions ("System") in response to the Proposed Rule. While we agree with the goal of modernizing the information technology regulations, for the reasons more fully explained in the FCC's comment letter, we do not believe that the Proposed Rule meets the objective of creating a "principles-based" approach. Moreover, some of the Proposed Rule's requirements are unclear or infeasible.

We appreciate the FCA's efforts to update the existing information technology regulations and replace the outdated E-Commerce Plan requirement. However, as set forth in the FCC comment letter, we believe some modest revisions would make the Proposed Rule clearer and easier to implement and more effective in the rapidly changing technological environment.

Thank you again for the opportunity to comment on the Proposed Rule. We hope that our comments herein, as well as those submitted by the FCC and other System institutions, will assist the FCA in its consideration of the Proposed Rule.

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

Sincerely,

Dave Cullins
SVP Administration

Shelby Womack
Director of Information Technology