



FARM • RANCH • RECREATIONAL FINANCING

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:

Plains Land Bank, FLCA ("PLB") 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 the 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 [and herein], 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.

In addition to supporting the position of the FCC regarding the Proposed Rule, Plains Land Bank, FLCA submits the following comments for your consideration:

- Plains Land Bank does not own or manage any system that it currently utilizes. Farm Credit Bank of Texas ("FCBT") handles vulnerability management for the information technology infrastructure and approved hardware and software on behalf of PLB. Because of this, PLB does not maintain the underlying IT infrastructure. Plains Land Bank has an independent review of the FCBT SOC 2 report which includes software, infrastructure, people, procedures, data, and network infrastructure provided. Previous SOC 2 reports show FCBT can be relied upon to monitor and mitigate any potential cyber risk and infrastructure breach of its provided network.

We appreciate the FCA's efforts to update the existing information technology regulations and replace the outdated E-Commerce Plan requirement.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 [and herein], 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,

Kay Lynn McLaughlin, CEO  
Plains Land Bank, FLCA