October 18, 2022

*Submitted via email to:* *reg-comm@fca.gov*

Ms. Autumn R. Agans

Deputy Director, Office of Regulatory Policy

Farm Credit Administration

1501 Farm Credit Drive

McLean, Virginia 22102-5090

**RE: Response to Notice of Intent & Request for Comment – *Statement on Regulatory Burden*, Farm Credit Administration, Agency; 12 CFR Chapter VI RIN 3052–AD55; 87Federal Register 43227-43228**

Dear Ms. Agans:

AgriBank, FCB (“AgriBank”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) Statement on Regulatory Burden published on July 20, 2022, Federal Register (“Statement on Regulatory Burden”).

AgriBank has reviewed the Farm Credit Council (“FCC”) comment letter on the Statement on Regulatory Burden and participated in the Farm Credit System Workgroup referenced in the FCC comment letter. The Workgroup met over several months to assemble comments from Farm Credit institutions regarding regulatory burdens and proposed various solutions or alternative approaches. The Workgroup also generally noted concern across Farm Credit about the fast pace of both the formal notice and comment rulemaking process, as well as the release of informal guidance in the past several years, resulting in administrative burdens and increased costs which, due to Farm Credit’s cooperative structure, ultimately result in increased costs to our member-owners.

AgriBank supports the comments offered by the FCC in its letter. In addition, AgriBank suggests that FCA not measure its own performance by the number of new regulations and guidance documents published, but rather by ensuring that its regulated institutions achieve their mission and remain safe and sound. It should be noted that the Farm Credit System, by all measures, is in fact safe and sound and is fulfilling its mission of being a dependable source of credit and related services for agriculture and rural communities.

We appreciate the opportunity to comment on the Statement on Regulatory Burden and FCA’s consideration of our comment letter. We would be happy to meet with FCA to discuss our comments or provide any additional information that FCA may deem helpful. If you have questions or require additional information, please contact me.

Sincerely,



Barbara Kay Stille

Chief Administrative Officer and General Counsel