



March 10, 2023

Joseph T. Connor, *Acting Director*  
*Office of Secondary Market Oversight*  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

Re: Response to Advance Notice of Proposed Rulemaking – *Federal Agricultural Mortgage Corporation Funding and Fiscal Affairs; Risk-Based Capital Requirements*, Farm Credit Administration, Agency; 12 CFR Part 652; RIN 3052-AD51; 87 Federal Register 4107-4111

Dear Mr. Connor:

On behalf of Farm Credit System (“FCS” or “System”) institutions, Farm Credit Council (“FCC”) appreciates the opportunity to comment on the Farm Credit Administration’s (“FCA”) Advance Notice of Proposed Rulemaking (“ANPRM”) that was published in the *Federal Register* on January 24, 2023 (88 FR 4107).

Given the scope and complexity of this ANPRM, FCC respectfully requests a comment extension of 30 days (beyond the current comment deadline of March 27, 2023) to appropriately respond to the agency’s request for public comment. We believe FCA will be better served with more complete feedback from the FCS given the anticipated ramifications of this rulemaking.

Thank you in advance for your time and consideration in reviewing this request. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Robert P. Boone III".

Robert Paul Boone, III  
Senior Vice President of Regulatory Affairs & General Counsel  
Farm Credit Council