



December 4, 2024

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

Re: Advanced Notice of Proposed Rulemaking – 12 CFR Parts 613 – RIN 3052-AD58; *Loans to Similar Entities*; 89 Federal Register 72759 (September 6, 2024)

Dear Ms. Agans:

AgTexas Farm Credit Services appreciates the opportunity to comment on the Farm Credit Administration's ("FCA") Advanced Notice of Proposed Rulemaking regarding Loans to Similar Entities that was published in the *Federal Register* on September 6, 2024 ("ANPRM").

AgTexas fully supports the comment letter submitted by the Farm Credit Council ("FCC") on behalf of Farm Credit System institutions ("System") in response to the ANPRM.

Similar entity loans aid System institutions in managing and diversifying risk and create opportunities for System lenders to collaborate with non-System lenders to support the broader agricultural value chain and rural communities. AgTexas does not support a proposed rule that might diminish the risk management and diversification benefits similar entity loans provide the System.

We trust that our comment, as well as those comments submitted by the FCC and other individual System associations and banks, will assist FCA in its efforts.

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

Sincerely,

A handwritten signature in blue ink that reads "R. Wade King". The signature is written in a cursive style with a long horizontal stroke at the end.

R. Wade King,
EVP – General Counsel