



SOUTHERN AGCREDIT

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December 3, 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:

Southern AgCredit, ACA 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").

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

We would like to emphasize the significant role that similar entity loans play in the System. These loans aid in managing and diversifying risk, while also creating opportunities for both System and non-System lenders to collaborate in lending structures that support the broader agricultural value chain and rural communities. As such, we do not support a proposed rule that diminishes 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,

Phillip D. Morgan
Chief Executive Officer