

June 7th, 2014

Mr. Barry F. Mardock  
Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1504 Farm Credit Drive  
McLean, VA 22102-5090

Dear Mr. Mardock,

I appreciate the opportunity to say a few words on the FCA's recent proposal rule regarding the Standards of Conduct. The Standards of Conduct are very important to our association and help unify associations across the country. The new FCA proposed rule does far more damage than good and should be revised.

I have been a director of High Plains Farm Credit for the past 5 years and I find the disclosure requirements in the Conflicts of Interest of the proposed rule to be inappropriate and unrealistic. The proposed rule ignores our association's cooperative structure and the way that I do business on my farming operation. I do a lot of business with local businesses and cooperatives through out the year who may be customers of High Plains Farm Credit. It is hard to know if the person I am doing business with is Customer of High Plains and that may vary from year to year. Even in instances where I know I'm dealing with an customer of High Plains Farm Credit, there is no conflict of interest since directors of High Plains do not have any role in approving loans or the terms of loans.

Your proposed requirements for me to disclose any transaction with a High Plains customer is very unrealistic. This will take a lot of time and paperwork for me and High Plains Farm Credit which seems so unnecessary. This proposed rule will discourage very qualified individuals from seeking a director position on High Plains Farm Credit. I already know of some business transactions that would have to be disclosed and know there will be many more in the future. This makes me question whether it is worth the hassle of staying a director of High Plains Farm Credit..

I believe that the Standards of Conflict of very important to our association, but sometime you can go to far with too many regulations. I urge you at FCA to revise the proposed rule substantially prior to issuing a final rule. Thank you for your consideration.

Sincerely,



Ron Koelsch  
High Plains Farm Credit Director  
706 SW 20 Rd.  
Great Bend, KS. 67530