Idaho AgCredit

Helping you grow

June 19, 2026

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

Re: Assessment and Apportionment of Administrative Expenses (12 CFR Part 607; RIN 3052–AD66)

Dear Ms. Agans:

Idaho AgCredit seeks to provide comments to the Farm Credit Administration's proposed rule revising the assessment and apportionment of administrative expenses under 12 CFR Part 607.

We recognize the necessity of FCA and what value it brings in assisting the Associations to remain safe and sound in their contributions to the Farm Credit System. We recognize we must work together with FCA as we collectively serve the Agricultural community in rural America.

We understand that the Farm Credit Council ("FCC") has submitted a comment letter on behalf of the Farm Credit System reflecting principles developed through a System workgroup. We support what has been outlined in this letter.

Idaho AgCredit supports a fair and equitable method and a modernization of the current assessment methodology. The Farm Credit System has changed significantly since the rule was adopted, with a substantial reduction in the number of institutions and a corresponding increase in the size and complexity of many. We believe that a recalibration ensures that institutions contribute more proportionally, improving fairness across the System.

The final rule needs to include a recognition of the depth and level of regulatory efforts based on risk to the Farm Credit System. Additionally, cost associated with the differential regulation based on the size and risk to the system should be applied. To be fair FCA must regularly assess its practices associated with the expense of operations to assure those providing the funding to the Agency that it is fulfilling its mission in a least cost manner. We encourage FCA to review the allocation between the Farm Credit System and Farmer Mac to ensure that it is equitable as well.

The final result should strengthen the assessment framework and reflect the foundational principles originally contemplated while adjusting to the reassessed efforts of necessary efficient agency activities.

We believe that FCA must demonstrate to the Farm Credit System and Farmer Mac that its cost of operations are prudent and within reason and that transparency of such is provided to those covering those costs. An outside review of the fiscal budget should be performed periodically to ensure that each system's allocation are being prudently used to ensure an efficient entity while protecting the safety and soundness of the Farm Credit system.

Thank you for the opportunity to comment and for FCA's continued commitment to an equitable regulatory structure for those it regulates.

Sincerely,
Idaho AgCredit

Marc Fonnesbeck
President and CEO