



June 17, 2014

Mr. Barry F. Mardock, Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

Dear Mr. Mardock:

Thank you for the opportunity to comment on FCA's recent proposed rule regarding Standards of Conduct. As a director of Great Plains Ag Credit, ACA, I am personally committed to maintaining high standards of conduct, and I know my association is as well. It would appear that the Agency has designed this regulation with the goal of discouraging active farmers from running for the board of a Farm Credit institution. That just makes no sense and it needs to be fixed.

My farming operation consists of row crop farming and cattle. I am also a full partner in a full-service commercial fertilizer sale and application business. My farming operation alone results in my conducting business with or having a relationship with a large percentage of the individuals and businesses in town. The fertilizer business multiplies this factor immeasurably. I am not provided a customer list of association customers so am I unaware when business is conducted with an association stockholder. My responsibility to the association is that of oversight – not management.

As a director, I find the transaction disclosure requirements in the Conflicts of Interest section of the proposed rule to be unduly burdensome, unnecessary and inappropriate. I do not have a role in approving individual loans or the terms of individual loans. It is unreasonable for me to be put in a position of having to know whether I am doing business with an association customer or not.

I routinely have business transactions with a wide variety of individuals, some of whom might be association customers. Even in instances when I know I'm dealing with an association customer, there is no conflict of interest since I have no role in making individual loan decisions.

The proposed disclosure requirements would require me to report and obtain pre-approval of transactions within my farming operation. This is an unrealistic burden to place on directors with no corresponding benefit.

I urge the FCA to revise substantially the proposed rule or consider withdrawing it. As drafted it is counterproductive, creating inappropriate, unreasonable standards that are inconsistent with modern farming operations. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Myles Frische".

Myles Frische  
Director