

August 14, 2008

Gary Van Meter
Deputy Director, Office of regulatory Policy
Farm Credit Association
1501 Farm Credit Drive
McLean, Virginia 22102-5090

Dear Mr. Van Meter:

As the Interim President of the Dunn County (Wisconsin) Economic Development Corporation and Director of the Stout Technology Park Development Corporation (Menomonie, Wisconsin), I would like to comment on proposed regulation for the Farm Credit System's (FCS) Mission Related Investment Authority.

Both of the entities that I represent take a neutral stance regarding FCS's regulatory authority. However, we believe that such authority, conducted in collaboration with rural community banks and partner organizations, may be valuable. Developing relationships with capital resources that provide rural communities with access to funds at a reasonable cost and with greater liquidity, benefits our organizations and the businesses we assist.

Rural community economic development authority depends on the availability of broad financing tools. Such authority helps lenders provide greater capital capacity and long-term, fixed rate financing. When these tools are used in tandem with community banks and partners in rural communities, they help locally led economic development entities, such as ours, work with local lenders to establish new commercial market opportunities. This, in turn, helps banks grow their client base and increase the economic development activity in our county's rural communities. The Farm Credit Association in our area has established this collaborative model.

The tools proposed in the proposed regulation, will create, when used in collaboration with rural entities, opportunities for new partnerships and enhanced access to USDA programs and industry expertise. We foresee a win for the client, a win for the rural bank, a win for the Farm Credit Association, and, most importantly from our perspective, a win for our communities. We support our rural banks and rural communities having access to this funding process.

Sincerely,


Christopher Smith
Interim President, DCEDC
Director, STPDC