



Deaf Smith Electric Cooperative Inc.

First & Whittier Streets
P.O. Box 753
Hereford, Texas 79045-0753
Telephone: (806) 364-1166
FAX: (806) 364-5481

August 13, 2012

Commodity Futures Trading Commission
David A. Stawick, Secretary of the Commission
1155 21st Street NW
Washington, D.C. 20581

Dear Commissioners:

On behalf of Deaf Smith Electric Cooperative, Inc., I am writing to support the Cooperative Exemption that would allow certain financial cooperatives to qualify for exclusion from the potentially costly clearing and margin requirements of the Dodd-Frank Act.

The proposed Cooperative Exemption would effectively pass through the end-user exception available to co-ops like mine to financial cooperatives that serve the electric cooperative network, such as the nonprofit National Rural Utilities Cooperative Finance Corporation (CFC) of which we are a member-owner. We believe that this "pass-through" is appropriate due to the unique member-owner structure of cooperatives.

Deaf Smith Electric Cooperative, Inc. serves just over 15,000 mostly agricultural based consumer/members located over four counties in the Texas panhandle. We serve a meter density of just above 3 meters per mile of power line. As a member-owner of CFC, Deaf Smith Electric relies on CFC to provide us with essential financial products that are critical to meeting the needs of our electric consumers. My cooperative has used CFC funds since 1969 to build system infrastructure including numerous substations and all the associated equipment – transformers, voltage regulators, circuit breakers, control systems, SCADA equipment, operating relays, grounding, land and right-of-way. In addition we have constructed both 69 and 115 KV transmission lines to bring power to these substations. Further, we use these loan funds to extend our power lines to new consumers serving residential, irrigation, commercial cattle feeding facilities, and dairies.

In connection with making loans to us, CFC uses over-the-counter interest rate swaps to mitigate its business risks. This use of such financial tools is instrumental in helping CFC make loans to rural electric cooperatives at the lowest possible cost of funds. If new requirements are imposed on CFC, the increased costs will undoubtedly be borne by our consumers in the form of higher rates.



I believe it is appropriate for CFC, as a cooperative financial entity owned by electric cooperatives, to be exempt from clearing and margin requirements, just as individual co-ops like mine would be exempt if they executed these transactions on their own.

I appreciate your consideration of my views.

Sincerely,

A handwritten signature in black ink that reads "Steve Louder". The signature is written in a cursive style with a large, prominent "S" and "L".

Steve Louder,
President and General Manager