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January 28, 2013

Mr. David A. Stawick  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

RE: Clearing Exemption for Certain Swaps Entered Into by Cooperatives, CFTC RIN 3038-AD47, 77  
Federal Register 41940, July 17, 2012.

Dear Mr. Stawick,

I am writing to strongly urge your Commission to not adopt the proposed Swap, Clearing exemption for Cooperatives including Farm Credit banks and credit unions regardless of their asset size.

I already compete on an uneven playing field with the farm credit system on both loans to farmers and to agri-businesses. The farm credit system already enjoys tax-exempt status on much of their interest income and they have a definite funding advantage over banks due to GSE status. With over \$90 billion in assets, there is no justification for giving the Farm Credit System additional advantages in competing with community banks. Large credit unions also do not need further advantages over community banks since they already enjoy paying no federal income taxes and have far less regulations.

I represent Lake City Bank, a Northern Indiana Bank with a strong focus on agricultural lending to producers and agri-businesses.

Thank you for considering my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph F. Kessie".

Joseph F. Kessie  
Senior Vice President  
Regional Manager/Commercial Loans