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April 24, 2015

*Submitted via website [www.regulations.gov](http://www.regulations.gov)*

Brandon Willis  
Administrator for the Risk Management Agency  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

**RE: Docket No. FCIC-13-0006**

Dear Administrator Willis,

On behalf of the National Association of Professional Insurance Agents (PIA)<sup>1</sup>, I hereby submit comments on the proposed rule to replace General Administrative Regulation-Subpart V. PIA appreciates the time and effort that has gone into crafting this rule and the opportunity to provide comments.

The Federal Crop Insurance Program (FCIP) is a highly technical program that relies on the expertise of independent insurance agents and approved insurance providers. PIA is concerned that the inclusion of the phrase "but is not limited to" in the definition of "delivery system" in Section 400.701 will inadvertently disrupt the current private/public partnership for selling and servicing crop insurance policies. Furthermore, the phrase is not a necessary component of the definition. PIA recommends that the phrase "but is not limited to" be removed from the definition of "delivery system."

It is our hope that these comments are helpful in working to craft a final rule. PIA is grateful for the opportunity to provide the independent insurance agent perspective. Please do not hesitate to contact me at [jennwe@pianet.org](mailto:jennwe@pianet.org) or (703) 518-1344 if you have any questions or concerns.

Kind Regards,

Jennifer M. Webb, Esq.  
Counsel & Director of Regulatory Affairs  
National Association of Professional Insurance Agents

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<sup>1</sup> PIA is a national trade association founded in 1931 which represents member insurance agents in all 50 states, Puerto Rico, Guam and the District of Columbia. PIA members are insurance professionals who can be found across America. Many PIA members sell crop insurance and are involved in crop insurance policy through the PIA Crop Insurance Working Group.