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May 1, 2005

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Ms. Rupp,

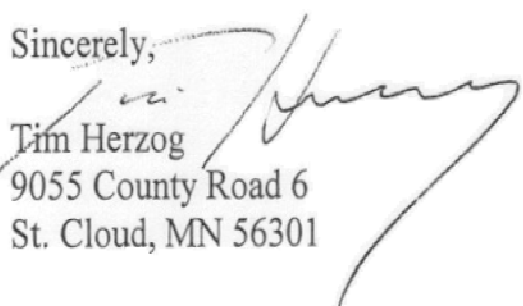
I am writing to you today concerning the proposed modifications to Member Business Lending rule, part 723. As a member of Central Minnesota Federal Credit Union, I feel these proposed changes would have an adverse affect on the financial well being of my credit union.

The proposed changes limit the ability of CMFCU to serve its members, many of whom are small business owners, which will ultimately impact the credit union's financial well-being and financial vitality. Our credit union has a 60 year history of serving members in rural Minnesota. A large percent of our members are involved in the agricultural industry, and CMFCU has been there to serve their needs over this time.

By severely restricting member business loan activity the credit union cannot develop, maintain and grow this highly important portion of its loan portfolio. Common sense regulations should be adopted which clearly delineate between construction, development, repair and/or minor modification to property for purposes of classifying these loans. Credit unions that posses proven track records of responsibly developing a business loan portfolio should also have additional room to serve their member's business lending needs. Sweeping regulations that do not leave room for the NCUA to classify a credit union's ability to safely provide these loans is counter productive to financial soundness and the credit union movement.

Thank you for accepting this letter of concern.

Sincerely,


Tim Herzog
9055 County Road 6
St. Cloud, MN 56301