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MAY 10 '05 PM 2:24 BOARD

Patricia Cremers
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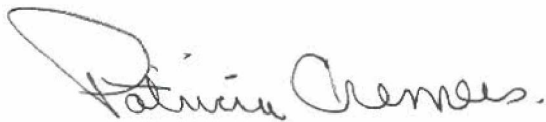
May 4, 2005

Mary Rupp
Secretary of the Board
National credit Union Administration
1775 Duke St
Alexandria VA 22314-3428

Dear Ms.Rupp,

As a Former Business owner in a rural area, I oppose the proposed amendments to the definition of construction or development loans for property, for income producing purposes. Being in a rural community we are known to have a higher percentage of smaller businesses, from Drug Stores to Farmers. Construction or development loans are not inherently more risky than other types of loans. The broader definition would limit the ability to meet the credit union member's needs. I believe that the minimum of two years of experience the credit union loan officers have is very qualifying to write these kinds of loans.

Thank you for your time.



Patricia Cremers