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May 5, 2005

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

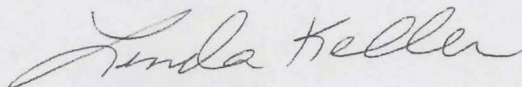
Dear Ms Rupp:

As an employee of Central Minnesota Federal Credit Union, I am writing in response to your proposed changes of Construction and Development Lending. Should these changes to Construction and Development Lending in regulation 723.4 become a reality, they would have a negative impact on our ability to serve our current and future members. I would like for you to reconsider these changes.

Our Credit Union is located in a small rural community where almost everyone knows and trusts everyone. As a rural community credit union, we serve the little guy, sole proprietors, in addition to large, corporate borrowers. A large portion of our loan portfolio consists of member business loans. Regular maintenance and repair, which are good things, can be considered construction or development lending and we may not be able to help them out. As a matter of fact, we could lose the entire line of business if we were not able to provide them with some of these routine requests. Determining a valid definition of maintenance vs. improvement is a concern. Simple activities such as painting a building or replacing carpeting could be considered an improvement. If a credit union is already involved with a business, you want to see them make improvements, expand and create jobs, not restrict access to funds further.

Thank you for taking the time to read this letter and thank you for your consideration in this matter.

Sincerely,



Linda Keller

Central Minnesota Federal Credit Union  
PO Box 160  
Melrose MN 56352