

May 3, 2005

Mary Rupp, Secretary of the Board, NCUA 1775 Duke Street Alexandria, VA 22314-3428

Dear Mary,

As a Human Resource professional at a Community Credit Union I feel that the proposed changes in the definition of Construction and Development lending as it pertains to regulation 723 is detrimental to the Members we serve. Credit Unions in rural communities help the small businesses, and now it appears if the small business will lose again. Not only does the proposed regulation limit the members' opportunity for funding in a time of need, it also affects the employment of many Business Lenders and Processors. NCUA requires that all Member Business Lenders have a minimum of two years of experience. Our lenders have that two years plus they participate in continuing education. They keep on top of the industry trends, developments, opportunities and threats.

By implementing the proposed changes, you will limit the growth of business development and job opportunities. This does not make sense when we are looking for an economy to rebound. Please reconsider the proposed changes to Construction and Development lending as it pertains to regulation 723.

Sincerely,

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Nadine Rieland 105 E 6th St N Melrose, MN 56352