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

This letter is in response to the NCUA Board proposal to change the definition of
Construction and Development lending as it pertains to regulation 723.

I am an employee of Central Minnesota Federal Credit Union. I have worked for the
Credit Union for just over 7 years. I started as a teller and I am now a Loan Processor. I
help the Members that come in looking for Construction and Development loans. I
believe that if it were not for the types of loans that we write we would not be the strong
Credit Union that we are today. Members rely on us to offer the best services we can and
I believe the Credit Union does a wonderful job with this. The Credit Union does not
charge the fees that typical Banks or other Institutions do and I think that that is one of
the main reasons that we are as large and as strong as we are today. The Members know
that they can come to us and we will help them and make their experience a very pleasant
and memorable one. There is no guess work and no hidden costs. We help any one from
the individual looking to build a home to the Business's that need to make repairs or start
a new business. Members are known as people and not just a number.

Over the years we have seen a demand for Construction and Development Loans. We
started out in 1988 with 43% of these types of loans and now we are at 60% for 2005. By
being limited on this it would greatly hurt not only the Credit Union but also our
Members. Members come to us looking for these services and if we are not able to offer
them or we are limited to the amount we can do it not only will chase away our members,
but they are more likely to go elsewhere then to find the services they are looking for. As
a credit union, an ordinary part of doing business is taking on the risk and managing it,
not to eliminate it completely. Existing definitions and limits provide sufficient risk
barriers

Sincerely,

Lisa Pundsack