



FEDERAL CREDIT UNION

Rec'd 6/17/05

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June 1, 2005

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

RE: Request for Comment: Member Business Loans

To Whom It May Concern:

I would like to take this opportunity to comment on the above referenced proposal concerning Member Business Loans.

The change to the definition of "well-capitalized" is not applicable for this Credit Union.

We do not support the changes to the definition of construction or development loan to include a loan that is designed for the redevelopment of property. In certain cases this seems to be less restrictive and does not allow credit union's to compete on par with banks who are able to lend more at a higher LTU.

Our suggestion for the MBL rule to be expanded would be to include the U.S. Dept. of Agriculture and other governmental programs that offer securities that would be appropriate for business lending.

We appreciate the opportunity to comment and request your consideration of these comments.

Sincerely,

Karen Ellis
Security/Compliance Officer

