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MAY10'05 PM 2:24 BOARD

May 5, 2005

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

Dear Ms. Rupp:

Recently, I was informed of NCUA's plans to modify the Member Business Lending Rule to consider any improvement loan to be a construction or development loan. As a loan processor for Central Minnesota Federal Credit Union, as well as being a long time member, I have seen the success CMFCU has had in the areas of agriculture and commercial lending.

CMFCU's agriculture and commercial lending departments are important to our credit union and the community we serve. If these modifications were to be made, it would decrease our ability to continue serving our members in the way that we have been and would greatly limit the development of small businesses and agriculture in our area. CMFCU has shown great expertise in both of these areas, which provides for less risk when doing construction and development loans.

Growing up on a dairy farm, the ability to get improvement loans was vital to the operation of my family's farm. Our local credit union was able to provide these for us. If these rules were to change this may not be the case. Many farms and businesses may not be able to operate efficiently, which in turn would affect the whole community.

Thank you for taking time to allow me to share my feelings on this topic. My hope is that the decision made by NCUA is what is best for credit unions, its members, and the communities they serve.

Sincerely,



April Wiechmann