

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

As a member and an employee of the Central MN Federal Credit Union, I am writing in regards to the proposed changes to the MBL regulations Part 723. I am against this proposal and feel this would have a negative effect for our members.

Central MN Federal Credit Union serves the little guy, sole proprietors,, and larger corporate borrowers. Some of ways this is done is through credit cards, HELOC loans and lines of credit. If the proposed were passed, the balance of these types of credit would be identified as construction and development loans. It is not the time to over regulate, but a time to encourage participation and helping people, especially the little guy. The CU has consistently received a CAMEL 1 rating.

The credit unions are like family to people and the community. They give the little people a chance and want to see the small businesses grow.

Sincerely
Jackie Fiedler