

May 5, 2005

Mary Rupp

Secretary of the Board

National Credit [Union Administration  
1775 Duke Street

Dear Ms. Rupp,

I have been a loan officer for Central Minnesota Federal Credit Union for the past 14 years. During that time, I have had the opportunity to help many members achieve and exceed their business goals.

The NCUA Board proposal to change the definition of Construction and Development (loans) - Regulation 723 would greatly limit my ability as a loan officer to help our ~~members~~ meet their business goals. I oppose the proposed amendments to include loans for renovating property already owned by a member that is being used to produce an income.

Central Minnesota Federal Credit Union is a community credit union with eight branches which serve small local cities and townships. All of these cities have plans for future growth in both residential and commercial developments, Credit Union members involved in these developments are looking to have the Credit Union provide them the financial resources needed for these developments, Small rural communities have a high percentage of small business. Small businesses rely on credit unions for financial services as opposed to larger banks.

Farmers in our rural communities need to keep improving and expanding their operation to feed their families and generate sufficient income to be competitive in the farming industry. Regulation 723 would limit their ability to expand and improve their operations. Central Minnesota Federal Credit Union is the largest agricultural lending credit union in the nation and the 12<sup>th</sup> largest member business lending credit union.