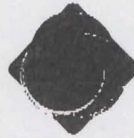


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OSU Federal
Your Community Credit Union™

June 3, 2005

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

Re: Comment Letter on Proposed Member Business Lending Revisions

Dear Ms. Rupp,

Thank you for the opportunity to provide comment on the proposed member business lending (MBL) regulatory revisions. The continued review and enhancement of regulations provides credit unions with greater opportunities in serving the underserved small businesses within our communities, while maintaining safety and soundness through proper controls.

Enhancements made to MBL rules in October 2004, permitting credit unions to make Small Business Administration (SBA) guaranteed loans under SBA's less restrictive lending requirements was an excellent first step. We are in support of NCUA expanding the scope of the amendment to include all government guaranteed loan programs. The programs available through a variety of governmental agencies are exceptional sources, critical in fostering the growth of small businesses. The guarantees available through these programs mitigate credit risk and offer additional opportunities for credit unions to serve small businesses.

We also support expanding the definition of construction and development loans to include property already owned by the business, and revising the definition of "net worth" used in the MBL rule to be consistent with the definition of that phrase found in the Federal Credit Union Act.

Thank you for your continued efforts to strengthen member business lending regulations and your leadership in expanding opportunities to serve business members. If you have question about this comment letter, please feel free to contact me at (541) 714-4204.

Sincerely,

Debra Riggle
Vice President Financial Services

PO Box 306, Corvallis, Oregon 97339-0306
800-732-0173 • www.osufederal.com