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May 4, 2005

Mary Rupp, Secretary of the Board, NCUA
1775 Duke Street
Alexandria, VA 22314-3428

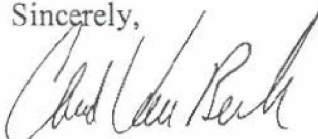
Dear Mary,

As a business loan officer of Central Minnesota Federal Credit Union for 12 years, I am writing in response to the changes proposed by NCUA in the definition of Construction and Development Lending. The proposed broader definition would limit Central Minnesota Federal Credit Union from serving its members to its fullest potential. I oppose the proposed amendments because they would include loans for renovating or developing property already owned by a borrower, for income-producing purposes. Virtually all member business loans written at Central Minnesota Federal Credit Union contain some aspect related to improvement of property, and would therefore be included in the construction and development category. These construction and development loans to borrowers who already own their property are no more risky than any other types of loans written by Central Minnesota Federal Credit Union. Business loan officers at our institution must have a minimum of 2 years of business lending experience in order to grant these types of loans, and therefore these loans are critically underwritten before they are granted.

As a community credit union, Central Minnesota Federal Credit Union serves the small business owners and small-town farmers of rural Minnesota. If we were not able to grant construction and development loans for the area farmers and business owners, this would greatly hinder the livelihood and growth of our local communities. As a percentage of our total loan portfolio, agricultural and commercial loans have grown from 43% in 1988 to over 60% in 2005. We have had a consistent and long-running commitment to the types of loans and many of these loans would qualify as construction and development loans under the new definition. Central Minnesota Federal Credit Union has many qualified business loan officers who have the knowledge on how to properly underwrite, close, service, and monitor these loans, so the precautionary measures are taken so as to protect the Credit Union from suffering losses.

I would like to thank NCUA for accepting this letter and taking the time to consider my view on this matter. Please feel free to call me with any questions.

Sincerely,



Chad Van Beck