



PUBLIC DISCLOSURE

September 21, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

NBT Bank, National Association
Charter Number: 1354

52 South Broad Street
Norwich, New York 13815

Office of the Comptroller of the Currency

5000 Brittonfield Parkway
Suite 102B
East Syracuse, New York 13057

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of NBT Bank, National Association (N. A.) with respect to the Lending, Investment, and Service Tests:

Performance Levels	NBT Bank, N. A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the High Satisfactory ratings in the states of Maine, Massachusetts, New Hampshire, New York and Vermont, and the Low Satisfactory rating in the state of Pennsylvania.
- The Investment Test rating is based on the High Satisfactory rating in the states Maine, Massachusetts, New Hampshire, New York, Pennsylvania and Vermont.
- The Service Test rating is based on High Satisfactory ratings in the states of Massachusetts, New Hampshire, New York, Pennsylvania and Vermont and the Low Satisfactory rating in the state of Maine.

Community Development Lending

In addition to community development loans originated in the bank's assessment areas (AA), the bank originated a \$20 million community development loan to a company based in the bank's Utica-Rome Metropolitan Statistical Area (MSA) AA with proceeds used to revitalize or stabilize federally declared disaster areas resulting from Hurricane Harvey in Texas, Hurricane Irma in Florida, and Hurricane Maria in Puerto Rico.

Innovative or Flexible Lending Programs

The bank offered innovative and flexible lending products for residential and commercial borrowers through federal government sponsored programs. The bank offered affordable lending products for low- and moderate-income borrowers through the Federal Housing Finance Agency (FHFA) First Home

Loan program and Federal Housing Administration (FHA), and small businesses through the United States Department of Agriculture (USDA) and Small Business Administration (SBA).

The bank used specialized home mortgage lending products in participation with the FHA, and FHFA through the First Home Loan program, that provide affordable loans to low- and moderate-income (LMI) borrowers. The terms of FHFA products include up to 98 percent loan-to-value (LTV), maximum of 80 percent of the Housing and Urban Development (HUD) median income, maximum 43 percent debt-to-income (DTI) ratio, and a minimum credit score of 640. The terms of the FHA product include up to 96.5 percent LTV, 45 percent DTI, and minimum credit score of 680.

The bank uses specialized home lending products in rural areas in participation with the USDA through the Rural Guaranteed program. These loans are primarily for rural areas where lending opportunities are scarcer and provide affordable lending products to LMI borrowers in these areas. Terms include up to 100 percent LTV, maximum DTI of 41 percent, maximum income dependent on the county and minimum credit score of 640.

The bank works with the SBA to provide affordable loans to small businesses bank-wide through the SBA-7A and Express programs. The terms of the program include guaranteeing 85 percent of loans less than \$150 thousand and 75 percent of loans greater than \$150 thousand.

Retail Services

NBT offered services that provided easy access to funds for low-income people who receive government assistance. Recipients (customer or non-customer) of Electronic Benefits Transfer Programs (EBT) could withdraw funds from any NBT automated teller machine (ATM) free of charge. During 2019, management reported 27,440 EBT transactions for customers and non-customers occurred at its ATMs free of charge to the card holder. The activity represented 4.4 percent of all ATM transactions in 2019.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AA.

The bank originated and purchased 92.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. NBT did not submit affiliate lending for consideration during this evaluation.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	7,789	94.9	415	5.1	8,204	1,289,854	89.1	158,388	10.9	1,448,242
Small Business	4,866	89.9	549	10.1	5,415	699,011	87.2	102,485	12.8	801,496
Small Farm	645	92.9	49	7.1	694	56,341	90.7	5,767	9.3	62,108
Total	13,300	92.9	1,013	7.1	14,313	2,045,206	88.5	266,640	11.5	2,311,846

Description of Institution

As of December 31, 2019, NBT Bank, N. A. (NBT) was a \$9.6 billion, multi-state community bank formed in 1856 and wholly owned by NBT Bancorp Inc. headquartered in Norwich, New York. Holding company NBT Bancorp Inc. (NBTB) formed in 1986 and traded on the NASDAQ under the NBTB symbol. NBTB primarily operated through NBT and two financial services companies – EPIC Advisors, Inc. and NBT Insurance Agency, LLC. EPIC Advisors, Inc., based in Rochester, NY, was a retirement plan administrator. NBT Insurance Agency, LLC, was a full-service insurance agency based in Norwich, NY.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth in all assessment areas with acquisition activity focused on wealth management services. NBT's business activities included commercial banking, retail banking and wealth management services provided to customers in its market area through 146 locations, online banking and mobile banking. NBT reported total loans and leases of \$7.1 billion, representing 74.0 percent of total assets, at December 31, 2019. Loan portfolio composition was as follows: 35.8 percent residential real estate loans including multifamily and home equity products, 25.1 percent consumer loans, 21.7 percent commercial real estate loans, 13.3 percent commercial/industrial loans, 2.1 percent construction/development loans and 2.0 percent other loan types including agriculture loans and a legacy leasing portfolio. Consumer loans consisted mainly of auto loans and specialty loans for medical, educational and renewable energy purposes. Deposits totaled \$7.6 billion and tier 1 equity capital totaled \$894.4 million as of December 31, 2019. NBT had a sizeable Fiduciary Activities portfolio with \$3.8 billion in fiduciary assets and \$2.1 billion in custody and safekeeping.

NBT's AAs covered six states with a total of 17 assessment areas. The AAs included one AA in southern Maine, one AA in western Massachusetts, three AAs in southern New Hampshire, six AAs in central and northeastern New York, four AAs in northeastern Pennsylvania, and two AAs in western Vermont. Branch locations were distributed as follows: one branch in Maine, five branches in Massachusetts, four branches in New Hampshire, 104 branches in New York, 28 branches in Pennsylvania and four branches in Vermont. During the evaluation period, NBT closed one branch in Massachusetts, five branches in New York and three branches in Pennsylvania. NBT opened one branch in New York and relocated a branch in Maine, a branch in New Hampshire and a branch in New York. Throughout the evaluation period, NBT maintained the same AA. NBT's AAs met the regulatory definition and did not arbitrarily exclude low- or moderate-income census tracts. NBT does not have any legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

NBT's prior Performance Evaluation dated September 5, 2017, resulted in a Satisfactory rating based on a High Satisfactory Lending Test rating, and Outstanding Investment Test rating and a High Satisfactory Service Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed using home mortgage, small business (SB), and small farm (SF) loans originated and purchased during the evaluation period which spanned from January 1, 2017 through December 31, 2019. Performance also included an assessment of community development (CD) activities from the date of the prior Performance Evaluation, September 5, 2017 through December 31, 2019. CD activities included CD loans, qualified investments, grants and donations, and CD services.

Lending performance was assessed based on the bank's primary loan products. Primary loan products, for purposes of this review, were products in which the bank originated at least 20 loans within an AA during the evaluation period. NBT had a sufficient volume of home mortgage and small business loans in all AAs to conduct a meaningful analysis. Small farm loans were evaluated only in the state of New York as NBT did not originate or purchase a sufficient volume of small farm loans in any AAs in Maine, Massachusetts, New Hampshire, Pennsylvania and Vermont to conduct a meaningful analysis. Home Mortgage Disclosure Act (HMDA) and SB/SF aggregate lending and market share percentages consider only lenders that submit HMDA and SB/SF data. Lenders that collect, but do not submit data, are not considered in the percentages.

Management provided home mortgage information for 2017, 2018, and 2019 as required by HMDA. Management provided small business and small farm information for 2017, 2018, and 2019 as required by the Community Reinvestment Act (CRA). Management did not collect or submit any consumer loan data for consideration. Examiners determined the data submitted as required by HMDA and CRA was reliable and accurate. Examiners also verified the CD activity data submitted by management.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings.

NBT operated in six states, Maine, Massachusetts, New Hampshire, New York, Pennsylvania and Vermont. New York was the most heavily weighted in the performance assessment as it represented 81.3 percent of total bank deposits, 71.2 percent of branches, 76.8 percent of loan volume (by number of

home mortgage, small business and small farm loans), 54.0 percent of AA census tracts and 51.4 percent of AA population. Pennsylvania carried the second heaviest weighting as it represented 13.0 percent of total bank deposits, 19.2 percent of branches, 13.2 percent of loan volume (by number of home mortgage, small business and small farm loans), 17.1 percent of AA census tracts and 15.8 percent of AA population. Performance in Maine, Massachusetts, New Hampshire and Vermont carried the least weight.

In New York, home mortgage loans represented 56.5 percent of loans originated and purchased by number during the evaluation period and received the heaviest weighting. In New York, small business loans received the second heaviest weighting followed by small farm loans. In Pennsylvania, home mortgage loans represented 72.5 percent of loans originated and purchased by number during the evaluation period and received a heavier weighting than small business loans. In Maine, Massachusetts and New Hampshire, home mortgage loans carried a heavier weighting than small business loans. In Vermont, home mortgage and small business loans received equal weighting.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Maine

CRA rating for the State of Maine: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans is good.
- The distribution of home mortgage loans to individuals of different incomes and small business loans to businesses of different sizes is good.
- The bank has made a high level of CD loans.
- The bank has an excellent level of CD investments, but through passive investments and small grants.
- The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- The bank provides a high level of CD services.

Description of Institution's Operations in Maine

NBT had one assessment area in the state of Maine consisting of the Portland-South Portland MSA AA (MSA #38860). The AA included all counties within the MSA namely Cumberland, York and Sagadahoc Counties. The AA was in southern Maine and bordered the state of New Hampshire to the south and west. As of December 31, 2019, NBT operated one full-service branch equipped with a deposit taking ATM in the state of Maine. The single branch represented 0.7 percent of the bank's total branch network.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities include commercial banking, retail banking and wealth management services. Home mortgage loans was NBT's primary product in Maine during the evaluation period and accounted for 70.1 percent of loans (based on home mortgage, small business and small farm loans) originated and purchased in Maine. The bank faced strong competition for deposits and loans in the AA.

NBT reported \$32.4 million in deposits, or 0.42 percent of the bank's total deposits, in the state of Maine based on Federal Deposit Insurance Corporation (FDIC) deposit information as of June 30, 2019. NBT ranked 32nd out of 37 depository institutions with 0.18 percent market share based on deposit

market share reports for June 30, 2019. The top banks in terms of deposit market share in the Portland-South Portland MSA AA included TD Bank N. A. with 12.86 percent, Bank of America N. A. with 11.76 percent, KeyBank N. A. (KeyBank) with 11.27 percent, People's United Bank N. A. with 5.71 percent, and Gorham Savings Bank with 5.59 percent.

NBT originated and purchased 0.78 percent of its total home mortgage loans and 0.53 percent of its total small business loans in the Portland-South Portland MSA AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics Inc. data, the Portland-South Portland MSA economy improved in 2019 following a weak 2018 and was in the late stages of an expansion cycle. Employment growth exceeded the Northeast average, which was attributed to the high paying manufacturing and low-wage hospitality industries. Portland, a seaport city with a significant amount of coastline in Cumberland County, was attractive for shipbuilding and tourism as the port can host large ships including cruise ships. Tourism was a key part of the MSAs economy due to the seaport, several inland lakes and nearby Acadia National Park. However, many tourism-related jobs were low-paying and seasonal.

The area had a large elderly population with residents over 65 years old representing 16.6 percent of the population which drove a large, stable healthcare industry. However, skilled labor was in high demand as the healthcare industry and other specialized industries replaced retirees. Population growth was modest and reliant on positive in-migration trends. Housing prices in the AA increased due to lack of supply which impacted housing affordability in the area. Based on the 2019 median family income (MFI) of \$86,700, low-income families making 50 percent or less of the MFI or \$43,350 would find it challenging to qualify for a mortgage loan given the \$248,747 median housing value in the AA.

According to U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) in Cumberland County was 2.2 percent, Sagadahoc County was 2.2 percent and York County was 2.7 percent. The unemployment in all three counties was well below the state unemployment rate of 4.8 percent. Top employers included healthcare providers Maine Health, Southern Maine Medical Center, Mercy Hospital and Webber Hospital Association. Other top employers included Bath Iron Works, L.L. Bean Incorporated, Pratt & Whitney Aircraft Group, Unum Provident and Hannaford Bros. Company.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from four community contacts conducted during the evaluation period within the Portland-South Portland MSA AA to determine local economic conditions and community needs. All four community contacts noted the cost of homes had increased and the need for affordable housing was increasing. Contacts also noted a lack of land for housing development and an influx of immigrant and refugee families who typically need affordable housing.

Portland-South Portland MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland-South Portland MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	3.4	22.2	53.0	18.8	2.6
Population by Geography	520,893	2.7	21.0	56.3	20.0	0.0
Housing Units by Geography	265,113	2.6	22.7	56.2	18.5	0.0
Owner-Occupied Units by Geography	150,789	0.9	16.4	60.5	22.3	0.0
Occupied Rental Units by Geography	63,878	7.6	36.0	44.1	12.4	0.0
Vacant Units by Geography	50,446	1.5	24.7	58.6	15.1	0.0
Businesses by Geography	39,174	2.5	26.2	50.4	20.9	0.0
Farms by Geography	1,381	0.7	14.8	62.1	22.4	0.0
Family Distribution by Income Level	134,957	20.7	17.8	21.8	39.7	0.0
Household Distribution by Income Level	214,667	23.9	16.2	18.1	41.8	0.0
2019 Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$86,700	Median Housing Value			\$248,747
			Median Gross Rent			\$941
			Families Below Poverty Level			7.2%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Maine

The OCC conducted a full-scope review of the Portland-South Portland MSA AA, NBT's only AA located in the state of Maine. Home mortgage loans, which accounted for 70.1 percent of loans originated and purchased in the AA during the evaluation period, were given more weight than small business loans. NBT did not originate or purchase any small farm loans in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

The bank's performance under the Lending Test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-South Portland MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Portland-South Portland MSA AA	61	26	0	5	92	100%	100%

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Portland-South Portland MSA AA	\$90,000	\$4,569	\$0	\$21,364	\$115,933	100%	100%

Lending in the Portland-South Portland MSA AA is excellent. As of June 30, 2019, there were 37 depository institutions in the AA. NBT ranked 32nd in deposits, or the 14th percentile, with 0.18 percent of the market share.

Based on 2019 HMDA market share data, NBT ranked 79th out of 385 lending institutions, or the 79th percentile, for home mortgage loan originations and purchases with a market share of 0.20 percent demonstrating excellent responsiveness to credit needs. The top five home mortgage originators/purchasers, Bangor Savings Bank, Residential Mortgage Services, United Shore Financial Services, Quicken Loans and The Camden National Bank, had a combined market share of 22.89 percent. Market share for the top five lenders ranged from 3.02 to 5.83 percent.

Based on 2018 CRA small business loan data, the bank ranked 67th out of 94 small business lenders, or the 29th percentile, representing 0.02 percent market share indicative of adequate responsiveness to credit needs. However, the bank entered the heavily competitive market in 2015 which takes time to penetrate. The bank's performance improved from two loans in 2018 to 21 loans in 2019 which equated to a ranking of 36th in 2018, or the 62nd percentile, and a 0.16 percent market share which is consistent with the bank's deposit market share and indicative of good performance. The top five lenders, American Express N. A., Chase Bank USA N. A., Citibank N. A., Bank of America N. A., and Capital One Bank (USA) N. A., had a combined market share of 51.99 percent. Market share for the top five banks ranged from 6.35 to 17.71 percent. Four of the five banks had an average loan size ranging from \$4 thousand to \$13 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

Refer to Table O in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The bank did not originate any small loans to businesses in low-income census tracts. The geographic distribution of small loans to businesses in moderate-income tracts significantly exceeded both the percentage of businesses and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of businesses in low-income census tracts and AA competition. Businesses in low-income census tracts represented only 2.49 percent of all businesses in the AA. The lack of lending by the bank in low-income census tracts did not have any significant adverse impact, as the percentage of businesses in those tracts is the equivalent of less than one loan, based on the bank's lending volume. NBT faced competition from credit card companies, large banks and multi-national companies. In 2018, the top five lenders in low-income census tracts, American Express National Bank, Chase Bank USA N. A., Bank of America, N. A., Bangor Savings Bank and Capital One Bank (USA) N. A., had a combined market share of 52.81 percent in the low-income census tracts. NBT offers credit cards through referrals to a third-party.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans to individuals of different income levels is excellent. Although the borrower distribution of home mortgage loans to low-income borrowers in the AA was

below the percentage of low-income families, the bank's performance significantly exceeded aggregate lending in the AA. The borrower distribution of home mortgage loans to moderate-income borrowers significantly exceeded both the distribution of moderate-income families and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is poor. The distribution of small loans to businesses with less than \$1 million in revenue was significantly below the distribution of businesses and aggregate lending in the AA.

The assessment of performance considered the bank's lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. In 2018, the bank ranked 38th out of 94 lenders with 0.02 percent market share for lenders making small loans to businesses with revenues of \$1 million or less which was consistent with its overall small business lending market share of 0.02 percent and ranking of 67th out of 94 lenders. Collectively, Citibank N. A., American Express National Bank, Bank of America N. A, TD Bank, N. A. and US Bank N. A. accounted for 57.15 percent of the market share for loans to businesses with less than \$1 million in revenue based on 2018 data. Four of the five institutions had an average loan size between \$4 thousand and \$15 thousand for loans to small-sized businesses which is indicative of credit card lending. While NBT does not originate credit cards, it does refer customers to a third-party credit card originator.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, NBT originated five loans totaling \$21.4 million in the Portland-South Portland MSA AA. This is a significant volume of CD lending considering the bank derives only \$32.4 million in deposits from the state. The bank originated three loans totaling \$11.5 million to organizations supporting affordable housing needs in the AA. The bank also made two loans totaling \$9.8 million to organizations providing community services in the AA that benefit LMI individuals. CD loans were responsive to identified community credit needs.

Maine Statewide

NBT originated two additional CD loans totaling \$21.7 million in the state of Maine, but outside of the bank's AA. One loan was originated to an organization to support affordable housing and the other loan was made to an organization to promote economic development.

Product Innovation and Flexibility

The institution makes limited use of innovative or flexible lending practices in order to serve AA credit needs. NBT offered several affordable home loan programs in the AA including the First Home Loan, USDA Rural Guaranteed, FHA, Home Possible, and 97 percent LMI programs. During the evaluation period, the bank did not originate any loans under these programs.

INVESTMENT TEST

The bank's performance under the Investment Test in Maine is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland-South Portland MSA AA is good.

The institution has an excellent level of qualified investments and grants, although not in a leadership position, nor those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland-South Portland MSA AA	4	\$1,948	15	\$1,339	19	70.4%	\$3,287	99.4%	0	0
Statewide (excluding AA)	0	\$0	8	\$20	8	29.6%	\$20	0.6%	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Current period investments totaled \$1.3 million and primarily supported affordable housing needs in the AA. The bank invested \$250 thousand in a community development financial institution (CDFI) and purchased a \$1.1 million mortgage-backed security (MBS) with underlying loans to low- and moderate-income borrowers. During the evaluation period, NBT made 13 donations totaling \$36 thousand to support affordable housing (\$16 thousand), community service organizations supporting LMI persons (\$15 thousand) and economic development (\$5 thousand) in the AA.

As of December 31, 2019, the outstanding balance on prior period investments totaled \$1.9 million and supported affordable housing through low-income housing tax credit (LIHTC) investments and bond purchases.

Maine Statewide

During the evaluation period, NBT also made eight donations totaling \$20 thousand to various focused community service organizations focused on LMI persons in the broader statewide area.

SERVICE TEST

The bank’s performance under the Service Test in Maine is rated Low Satisfactory.

Conclusions for Area Receiving a Full Scope Review

Based on a full-scope review, the bank’s performance in the Portland-South Portland MSA AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Portland-South Portland MSA AA	100%	1	100%	0.00	100.0	0.00	0.00	2.7	21.0	56.3	20.0

NBT operated one branch in the Portland-South Portland MSA AA, located in a moderate-income census tract, which was considered favorably considering the population distribution. The branch includes a deposit-taking ATM enhanced with deposit automation which provides faster access to funds and images of deposited checks. The assessment of performance considered the small percentage of the population residing in low-income census tracts.

The bank’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank relocated its sole branch within the same moderate-income census tract.

Services, including location and business hours are not particularly convenient to its AA(s) including low- and moderate-income geographies and/or individuals. The branch was located on the third floor of a commercial building on a side street set back from the main street. Branch hours of operation were Monday through Friday from 9:00 a.m. to 3:00 p.m. with after-hours deposits/withdrawals available through the on-site ATM. Other institutions in the area offered later weekday hours, Saturday hours and drive-up facilities.

Alternative delivery systems included telephone, online, and mobile banking. The bank reported one customer from a moderate-income census tract used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported one Classic Checking customer from a low-income census tract in the AA and 14 Classic Checking customers from moderate-income census tracts in the AA.

Community Development Services

The institution provides a high level of CD services.

A staff member provided 180 CD service hours to four organizations in the AA. The staff member provided services to organizations with the purpose of providing community services to LMI and promoting economic development in the AA.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans in good.
- The distribution of home mortgage loans to individuals of different incomes and small business loans to businesses of different sizes is adequate.
- The bank has an excellent level of qualified investments, but through passive investments and small grants.
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank provides a high level of CD services.

Description of Institution's Operations in Massachusetts

NBT had one assessment area in state of Massachusetts consisting of the Pittsfield MSA AA (MSA #38340). The AA included the sole county within the MSA, Berkshire County. The AA was in western Massachusetts and bordered the state of New York to the west, the state of Vermont to the north and state of Connecticut to the south. NBT operated five full-service branches, each equipped with a deposit taking ATM, and one standalone, deposit taking ATM in the state of Massachusetts as of December 31, 2019. The five branches represented 3.4 percent of the bank's total branch network.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities included commercial banking, retail banking and wealth management services. Home mortgage loans was NBT's primary product in Massachusetts during the evaluation period accounting for 66.7 percent of loans made in Massachusetts. The bank faced moderate competition for deposits and loans in the AA.

NBT reported \$115.4 million in deposits, or 1.51 percent of the bank's total deposits, in the state of Massachusetts based on FDIC deposit information as of June 30, 2019. NBT ranked eighth out of 14 depository institutions with 2.03 percent market share based on deposit market share reports for June 30, 2019. Top banks in terms of deposit market share in the Pittsfield MSA AA included Berkshire Bank

with 42.53 percent, Greylock Federal Credit Union (FCU) with 18.66 percent, Adams Community Bank with 8.82 percent, TD Bank N. A. with 7.29 percent and MountainOne Bank with 6.88 percent.

NBT originated and purchased 1.57 percent of its total home mortgage loans and 1.25 percent of its total small business loans in the Pittsfield MSA AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics data, the Pittsfield MSA was in the recovery stage of the business cycle. Berkshire County, the sole county in the Pittsfield MSA, was home to Berkshire Hills, a continuation of the Green Mountains of Vermont, a segment of the Appalachian Mountains. Berkshire County was considered a tourism hub as the area hosts a portion of the Appalachian National Scenic Trail, several state forests and ski resorts. A declining population and little change in the labor force led to a tight labor market with low unemployment. The area had a sizeable elderly population with 20.2 percent of the population over 65 years old. The healthcare industry experienced modest growth in 2019 with an above-average number of healthcare workers per capita. The Pittsfield MSA had the largest population decline in Massachusetts in 2018 and the second largest in New England. The Pittsfield MSA had above average housing affordability and local demand for housing was weak. The high level of affordable housing attracted retirees, vacation home buyers and investors which recently impacted housing prices as demand increased.

According to U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) in Berkshire County was 3.1 percent which was well below the state unemployment rate of 6.9 percent. The state of Massachusetts reported the largest area employers as Berkshire Medical Center, Berkshire Concrete Corporation, BMC Hillcrest Campus, Canyon Ranch and SABIC Innovative Plastics.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Pittsfield MSA AA to determine local economic conditions and community needs. Community contacts cited financial literacy as a priority in the AA. Additionally, due to the level of low-wage workers in the area, housing affordability was a secondary issue. Recently, housing prices increased due to vacation home purchases making it more difficult to find affordable housing.

Pittsfield MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsfield MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	7.7	10.3	51.3	30.8	0.0
Population by Geography	129,288	8.4	11.4	50.5	29.7	0.0
Housing Units by Geography	68,385	9.0	10.7	50.5	29.8	0.0
Owner-Occupied Units by Geography	37,899	3.1	10.2	55.5	31.2	0.0
Occupied Rental Units by Geography	17,341	23.9	15.9	40.3	19.9	0.0
Vacant Units by Geography	13,145	6.1	5.5	49.8	38.6	0.0
Businesses by Geography	10,122	13.6	6.6	42.6	37.1	0.0
Farms by Geography	360	1.9	5.0	48.6	44.4	0.0
Family Distribution by Income Level	33,021	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	55,240	25.2	15.3	17.3	42.2	0.0
2019 Median Family Income MSA - 38340 Pittsfield, MA MSA		\$81,700	Median Housing Value			\$227,590
			Median Gross Rent			\$771
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Massachusetts

The OCC conducted a full-scope review of the Pittsfield MSA AA, NBT's only AA located in the state of Massachusetts. Home mortgage loans, which accounted for 66.7 percent of loans made in the AA during the evaluation period, were given more weight than small business loans. NBT did not originate or purchase any small farm loans in the AA during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank's performance under the Lending Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsfield MSA AA is good.

Lending Activity

Lending levels reflects excellent responsiveness to credit needs in the AA.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Pittsfield MSA AA	122	61	0	1	184	100%	100%

Dollar Volume of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Pittsfield MSA AA	\$19,698	\$10,452	0	\$3,000	\$33,150	100%	100%

Lending in the Pittsfield MSA AA is excellent. As of June 30, 2019, the bank ranked eighth of out 14 depository institutions, or the 43rd percentile, with a deposit market share of 2.03 percent.

Based on 2019 HMDA market share data, NBT ranked 15th out of 192 lending institutions, or the 93rd percentile, for home mortgage loan originations and purchases with a market share of 1.41 percent demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, Greylock FCU, Adams Community Bank, Academy Mortgage Corporation, Lee Bank and Berkshire Bank, had a combined market share of 54.69 percent. Market share for the top five ranged from 4.92 to 22.59 percent.

Based on 2018 CRA small business loan data, the bank ranked 19th out of 65 small business lenders, or the 71st percentile, representing a market share of 0.66 percent demonstrating good responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Chase Bank USA N. A., Citibank N. A., US Bank N. A., and Capital One Bank (USA) N. A., had a combined market share of 67.35 percent. Market share for the top five ranged from 7.78 percent to 24.05 percent. The five banks had an average loan size ranging from \$5 thousand to \$13 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

Refer to Table O in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was well below both the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate income tracts exceeded both the percentage of businesses in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the bank's market share in low-income census tracts compared to its overall market share and competition from credit card companies, large banks and multi-national companies. In 2018, the bank ranked 12th out of 65 lenders, or the 82nd percentile, with 0.70 percent market share for lenders making small loans to businesses in low-income census tracts which exceeded its overall small business lending market share of 0.66 percent and ranking of 19th out of 65 lenders, or the 71st percentile. In 2018, the top five lenders in low-income census tracts, American Express National Bank, Capital One Bank (USA) N. A., Chase Bank USA N. A., US Bank N. A. and Citibank N. A., had a combined market share of 66.20 percent in the low-income census tracts. None of these institutions had a physical presence in the AA, and NBT offers credit cards through referrals to a third-party.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans to individuals of different income levels is adequate. Home mortgage lending to low-income borrowers was well below the number of low-income families but exceeded aggregate lending to low-income families in the AA. Home mortgage lending to moderate-income families was significantly below both the number of moderate-income families and aggregate lending to moderate-income families in the AA. We considered the limited affordability of housing in the distribution of loans to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is good. The distribution of small loans to businesses with less than \$1 million in revenue was well below the number of businesses with less than \$1 million in revenue but significantly exceeded aggregate lending in the AA.

Community Development Lending

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the evaluation period, NBT originated one loan totaling \$3 million to an organization in the Pittsfield MSA AA whose mission was to enable and accelerate growth in the manufacturing industry to spur economic growth, job creation and retention, and investment in the AA.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. NBT offered several affordable home loan programs in the AA including the First Home Loan, USDA Rural Guaranteed, FHA, Home in the City LMI Loan, Home Possible, and 97 percent LMI programs. During the evaluation period, the bank originated seven loans under the Home in the City LMI Loan program and one loan for \$123 thousand under the USDA Rural Guaranteed program.

INVESTMENT TEST

The bank's performance under the Investment Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pittsfield MSA AA is good. The institution has an excellent level of qualified CD investment and grants, though not in a leadership position, nor those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsfield MSA AA	1	\$2,377	10	\$2,521	11	100.0%	\$4,898	100.0%	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, the bank purchased an agency mortgage backed security totaling \$2.5 million representing a pool of mortgage loans including a loan used to finance affordable housing for seniors in the AA. The bank made \$18 thousand in donations to support affordable housing initiatives in the AA. As of December 31, 2019, the remaining balance of prior period investments which supported affordable housing for elderly low-income individuals totaled \$2.4 million.

SERVICE TEST

The bank's performance under the Service Test in Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full Scope Review

Based on a full-scope review, the bank's performance in the Pittsfield MSA AA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsfield MSA AA	100.0%	5	100.0%	20.0	20.0	40.0	20.0	8.4	11.4	50.5	29.7

As of December 31, 2019, NBT operated five branches in the Pittsfield MSA AA. The bank operated one branch each in low- and moderate-income census tracts, proportionate to the population distribution. Each of the five branches in the AA had a deposit taking ATM enhanced with deposit automation which provided faster access to funds and images of deposited checks.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Pittsfield MSA AA	0	1	0	0	0	-1

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, NBT closed one branch located in an upper-income census tract.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA(s), particularly low- and moderate-income geographies and/or individuals. All five branch locations had a deposit taking ATM and four of the branches also operated drive-up services with extended operating hours. The office hours at the five branches were comparable with most branches open 8:30 a.m. to 4:30 p.m. during the week with longer hours on Friday and shorter hours on Saturday. However, the branch in the low-income census tract did not have Saturday hours. The branch was in the downtown business district, which had little activity on the weekends to justify opening the branch.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported eight customers from low-income census tracts and 18 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities; so, no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 195 Classic Checking customers from low-income census tracts in the AA and 314 Classic Checking customers from moderate-income census tracts in the AA.

Community Development Services

The institution provides a high level of CD services.

NBT provides a high level of CD services within the Pittsfield MSA AA. Two bank staff members provided 133 CD service hours to three organizations in the AA. Staff members provided services to organizations with the purpose of assisting with affordable housing and community services targeting LMI in the AA.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs
- The geographic distribution of loans is excellent.
- The distribution of home mortgage loans to individuals of different incomes and small business loans to businesses of different sizes is good.
- A relatively high level of CD loans in the state of New Hampshire
- The bank has a significant level of qualified investments and grants.
- Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.
- The institution provides a high level of CD services.

Description of Institution's Operations in New Hampshire

NBT had three assessment areas in the state of New Hampshire consisting of the Manchester-Nashua MSA AA (MSA #31700), the NH Non-MSA AA and the Rockingham County-Strafford County Metropolitan Division AA (Rockingham-Strafford MD AA) (MD #40484). The Rockingham-Strafford MD is part of the larger Boston-Cambridge-Newton MA-NH MSA (MSA #14460). The Manchester-Nashua MSA AA was comprised of the sole county of Hillsborough County. The NH Non-MSA AA consisted of Cheshire County. The Rockingham-Strafford MD AA included all counties within the MD namely Rockingham County and Strafford County. The three AAs, in southern New Hampshire, were contiguous and bordered Massachusetts to the south and Maine to the east. NBT operated four full-service branches, and three stand-alone, primarily cash-dispensing ATMs in the state of New Hampshire as of December 31, 2019. The four branches were equipped with primarily deposit taking ATMs and represented 2.7 percent of the bank's total branch network.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities included commercial banking, retail banking and wealth management services. Home mortgage loans was NBT's primary product in New Hampshire during the evaluation period accounting for 55.1 percent of loans made in New Hampshire. The bank faced strong competition for deposits and loans in the state.

NBT reported \$144.6 million in deposits, or 1.89 percent of the bank's total deposits in the state of New Hampshire, based on FDIC deposit information as of June 30, 2019. NBT ranked 27th out of 45 depository institutions with 0.47 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the combined AAs in the state of New Hampshire included Citizens Bank N. A. with 21.18 percent, TD Bank N. A. with 18.81 percent, Bank of America N. A. with 12.10 percent, Service FCU with 9.82 percent and People's United Bank N. A. with 4.90 percent.

NBT originated and purchased 3.86 percent of its total home mortgage loans and 4.97 percent of its small business loans in the state of New Hampshire AAs during the evaluation period.

Manchester-Nashua MSA AA

NBT operated two branches equipped with deposit taking ATMs and two stand-alone, cash dispensing ATMs in the Manchester-Nashua MSA AA. The branches were in a low-income census tract and a moderate-income census tract in Hillsborough County. The two branch locations accounted for 1.37 percent of NBT bank-wide branch network and 50.0 percent of the branches in New Hampshire as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$88.7 million in deposits in the Manchester-Nashua MSA AA which represented 1.16 percent of the bank's total deposits and 61.36 percent of the deposits in the state of New Hampshire. NBT ranked 18th out of 26 depository institutions in the AA with 0.62 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included Citizens Bank N. A. with 30.83 percent, TD Bank N. A. with 18.38 percent, Bank of America N. A. with 17.17 percent, St. Mary's Bank with 6.42 percent and Triangle Credit Union with 4.08 percent.

NBT originated and purchased 2.22 percent of its total home mortgage loans in the AA and 57.48 percent of home mortgage loans in the state in the Manchester-Nashua MSA AA during the evaluation period. NBT originated and purchased 2.34 percent of its total small business loans in the AA and 47.11 percent of small business loans in the state in the Manchester-Nashua MSA AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics data, the Manchester-Nashua NH MSA was in the late expansion stage of the business cycle with its economy exhibiting several favorable factors, despite lagging the nation in population growth. Hillsborough County, the sole county in the Manchester-Nashua MSA, had a highly educated workforce with above average income earnings and low taxation. Manufacturing and healthcare industries significantly contributed to above average wages in the area. The community was within reasonable proximity to Boston, Massachusetts which attracted workers seeking more affordable housing than that offered in Boston and its suburbs. However, the proximity drove up the demand for housing and increased home prices. Based on the 2019 MFI of \$98,100, low-income families making 50 percent or less of the MFI or \$49,050 would find it challenging to qualify for a mortgage loan given the \$238,896 median housing value in the AA.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Hillsborough County was 2.4 percent which was well below the state unemployment rate of 3.8 percent. The largest employers in the Manchester-Nashua NH MSA were Walmart Inc., Fidelity Investments, Liberty Mutual Insurance, Hannaford Bros. Co., Elliot Hospital, and BAE Systems Electronic Solutions.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Manchester-Nashua MSA AA to determine local economic conditions and community needs. Both community contacts cited the lack of affordable housing in the Manchester-Nashua MSA AA as a primary credit need. In addition to affordable home mortgage lending, one contact identified the need for small business loans and noted a significant gap between the distribution of wealth in the region which was driving up the cost of living.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Manchester-Nashua MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	9.3	24.4	39.5	25.6	1.2
Population by Geography	403,972	7.6	20.1	40.3	31.9	0.0
Housing Units by Geography	167,207	8.4	22.6	40.7	28.3	0.0
Owner-Occupied Units by Geography	103,496	2.2	14.6	44.2	39.0	0.0
Occupied Rental Units by Geography	51,712	19.6	37.6	32.9	9.9	0.0
Vacant Units by Geography	11,999	14.2	26.6	43.9	15.3	0.0
Businesses by Geography	30,942	7.8	20.8	38.3	32.7	0.5
Farms by Geography	897	2.5	11.4	47.6	38.5	0.1
Family Distribution by Income Level	104,048	20.3	17.8	22.1	39.8	0.0
Household Distribution by Income Level	155,208	23.7	16.1	18.5	41.7	0.0
2019 Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$98,100	Median Housing Value			\$238,896
			Median Gross Rent			\$1,069
			Families Below Poverty Level			5.8%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Rockingham-Strafford MD AA

NBT operated one branch equipped with a cash dispensing ATM and one stand-alone, deposit taking ATM in the Rockingham-Strafford MD AA. The branch was in an upper-income census tract in Rockingham County. The branch location accounted for 0.68 percent of NBT bank-wide branch network and 25.0 percent of the branches in New Hampshire as of December 31, 2019.

The bank faced moderate competition for deposits and loans in the AA. NBT reported \$9.1 million in deposits in the Rockingham-Strafford MD AA which represented 0.12 percent of the bank's total deposits and 6.27 percent of the deposits in the state of New Hampshire. NBT ranked 28th out of 29 depository institutions in the AA with 0.06 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included Service FCU with 20.56 percent, TD Bank N. A. with 17.48 percent, Citizens Bank N. A. with 13.41 percent, Northeast Credit Union with 8.52 percent and Bank of America N. A. with 7.91 percent.

NBT originated and purchased 1.32 percent of its total home mortgage loans in the AA and 34.22 percent of home mortgage loans in the state in the Rockingham-Strafford MD AA during the evaluation period. NBT originated and purchased 1.13 percent of its total small business loans in the AA and 22.73 percent of small business loans in the state in the Rockingham-Strafford MD AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics Inc. data, the Rockingham-Strafford MD was in the late expansion stage of the business cycle. The Rockingham-Strafford MD had a favorable tax environment compared to the nearby Boston metro region with its generally higher levels of educational attainment and median household income. The Rockingham-Strafford MD had a biotech subsector and expanding pharma and medical technology manufacturing spurred by state grants and tax exemptions that were attracting more quality workers as firms look to invest in infrastructure in the region. Housing prices appreciated due to the high number of Boston metro commuters and growing retirement communities. Based on the 2019 MFI of \$103,200, low-income families making 50 percent or less of the MFI or \$51,600 would find it challenging to qualify for a mortgage loan given the \$271,893 median housing value in the AA.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Rockingham County was 2.5 percent and Strafford County was 2.1 percent, both of which were well below the state unemployment rate of 3.8 percent. The largest employers in the Rockingham County-Strafford County NH MD were Genesis Healthcare, Shaw's Supermarkets Inc., Wentworth-Douglass Hospital, Exeter Hospital, Portsmouth Regional Hospital, and General Electric Co.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact conducted during the evaluation period within the Rockingham-Strafford MD AA to determine local economic conditions and community needs. The community contact cited affordable housing as a primary credit need. The contact indicated the cost of land development serves as a significant barrier for investment, and those homes being built are higher-end housing, further driving up overall home prices beyond the means of many low- and moderate-income populations.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Rockingham-Strafford MD AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	91	1.1	20.9	53.8	22.0	2.2
Population by Geography	424,279	1.4	20.9	56.8	20.9	0.0
Housing Units by Geography	180,231	1.8	23.6	55.2	19.4	0.0
Owner-Occupied Units by Geography	120,987	1.1	17.7	59.2	22.1	0.0
Occupied Rental Units by Geography	44,257	3.5	36.4	47.4	12.8	0.0
Vacant Units by Geography	14,987	2.5	33.5	46.2	17.8	0.0
Businesses by Geography	35,754	1.5	17.9	58.3	22.0	0.3
Farms by Geography	1,175	0.5	15.0	59.8	24.5	0.2
Family Distribution by Income Level	113,303	19.1	18.3	23.0	39.7	0.0
Household Distribution by Income Level	165,244	22.9	16.6	19.2	41.3	0.0
2019 Median Family Income MD - 40484 Rockingham County-Strafford County, NH		\$103,200	Median Housing Value			\$271,893
			Median Gross Rent			\$1,084
			Families Below Poverty Level			4.4%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New Hampshire

The OCC conducted full-scope reviews of the Manchester-Nashua MSA AA and the Rockingham-Strafford MD AA and a limited-scope review of the NH Non-MSA AA. The two full-scope assessment areas accounted for 67.6 percent of deposits, 81.9 percent of loans and 75.0 percent of branches in the state of New Hampshire. Manchester-Nashua MSA AA received the highest weighting of the three AAs as it accounted for 61.4 percent of deposits, 52.9 percent of lending and 50.0 percent of the branches in the state. Home mortgage loans, which accounted for 55.1 percent of loans made in the state's AAs during the evaluation period, were given more weight than small business loans. NBT originated and purchased three small farm loans during the evaluation period which were not analyzed since an analysis would not be meaningful.

As mentioned previously, the Rockingham-Strafford MD was part of the larger Boston-Cambridge-Newton MA-NH MSA (MSA #14460). The MSA included two other MD's which the bank did not include in the AA. Therefore, the analysis of the activity in this MSA focused on the activity in the Rockingham-Strafford MD.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN New Hampshire

LENDING TEST

The bank's performance under the Lending Test in New Hampshire is rated High Satisfactory.

Conclusions for Areas Receiving Full Scope Reviews

Based on full-scope reviews, the bank's performance in both the Manchester-Nashua MSA AA and the Rockingham-Strafford MD AA is considered good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Manchester-Nashua MSA AA	173	114	2	1	290	52.92	61.36
Rockingham-Strafford MD AA	103	55	0	1	159	29.01	6.27
NH Non MSA AA	25	73	1	0	99	18.07	32.38

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Manchester-Nashua MSA AA	\$80,419	\$30,788	\$560	\$1,000	\$112,767	57.55	61.36
Rockingham-Strafford MD AA	\$32,576	\$12,284	\$0	\$8,000	\$52,860	26.97	6.27
NH Non MSA AA	\$4,577	\$25,667	\$85	\$0	\$30,329	15.48	32.38

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Manchester-Nashua MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$88.7 million in deposits in the Manchester-Nashua MSA AA. As of June 30, 2019, the bank ranked 18th among 26 depository institutions, or the 31st percentile, with 0.62 percent market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 48th out of 353 lending institutions for home mortgage loan originations and purchases, or the 86th percentile, with a market share of 0.51 percent demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, Residential Mortgage Services, Community Bank N. A. (CBNA), Quicken Loans, Digital FCU and Wells Fargo N. A., had a combined market share of 27.46. Market share for the top five lenders ranged from 4.52 percent to 6.52 percent.

Based on 2018 CRA small business loan data, the bank ranked 26th out of 89 small business lenders, 71st percentile, with a market share of 0.31 percent demonstrating excellent responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Chase Bank USA, N. A., Citibank, N. A., Bank of America N. A., and Capital One Bank (USA), N. A., had a combined market share of 58.39 percent. Market share for the top five banks ranged from 6.90 percent to 20.80 percent. Four of the five had average loan sizes ranging from \$6 thousand to \$15 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Rockingham-Strafford MD AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$9.06 million in deposits in the Rockingham-Strafford MD AA. As of June 30, 2019, the bank ranked 28th out of 29 depository institutions, or third percentile, with 0.06 percent deposit market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 65th out of 394 lending institutions for home mortgage loan originations and purchases, or the 84th percentile, with a market share of 0.31 percent demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, CBNA, Quicken Loans, Wells Fargo N. A., CMG Mortgage Inc., and United Shore Financial Service, had a combined market share of 23.38. Market share for the top five lenders ranged from 3.34 percent to 6.92 percent.

Based on 2018 CRA small business loan data, the bank ranked 46th out of 102 small business lenders, or the 55th percentile, representing a market share of 0.10 percent demonstrating excellent responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Chase Bank USA, N. A., Bank of America N. A., Citibank, N. A., and Capital One Bank (USA), N. A., had a combined market share of 58.97 percent. Market share for the top five lenders ranged from 7.06 percent to 22.49 percent. Four of the five had an average loan size ranging from \$5 thousand to \$13 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent.

Manchester-Nashua MSA AA

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

Rockingham-Strafford MD AA

The geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

Manchester-Nashua MSA AA

The geographic distribution of small loans to businesses is excellent. The geographic distribution of small loans to businesses in low-income census tracts exceeded both the percentage of businesses located in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate income census tracts significantly exceeded both the percentage of business in moderate-income census tracts and aggregate lending in the AA.

Rockingham-Strafford MD AA

The geographic distribution of small loans to business is adequate. The bank did not originate any loans in low-income census tracts. The geographic distribution of small loans to businesses in moderate-income tracts was well below both the percentage of businesses in moderate-income tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of businesses operating in low-income census tracts and competition from credit card companies, large banks and multi-national companies. Only 1.49 percent of the businesses in the AA, which equated to 532 businesses, operated in low-income census tracts which represented less than one loan based on NBT's volume. In 2018, the top five lenders in low-income census tracts, American Express National Bank, Citibank N. A., Capital One Bank (USA) N. A., TD Bank N. A. and Synchrony Bank, had a combined market share of 61.27 percent in the low-income census tracts. Of the five, only TD Bank had a physical presence in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans in the state of New Hampshire is good.

The assessment of the borrower distribution of home mortgage loans for both full-scope AAs considered the high cost of home ownership would not be affordable for low-income borrowers earning no more than 50 percent of the assessment area median family income, as highlighted in the affordability table below using 2019 FFIEC adjusted median family income. Refer to discussions within each individual assessment area for specific analysis as to the affordability of home ownership for low-income borrowers.

State of NH Affordability Table 2019:

MSA Name	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home Listing Price*	Mortgage Payment Based on Listing Price
Manchester-Nashua MSA AA	\$98,100	\$49,050	\$228,428	\$1,226	\$78,480	\$365,485	\$1,962	\$305,000	\$1,637
Rockingham-Strafford MD AA	\$103,200	\$51,600	\$240,303	\$1,290	\$82,560	\$384,485	\$2,064	\$327,400	\$1,758

*Source – Realtor.com median listing price data as of December 2019

Manchester-Nashua MSA AA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near the percentage of moderate-income families but below the aggregate lending in the AA.

The assessment of performance considered the affordability of home ownership for low-income borrowers within the Manchester-Nashua MSA AA and the bank's market share to low-income families compared to its overall market share. Specifically for this assessment area, assuming a 30-year mortgage

with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$49,050 per year (or less than 50 percent of the 2019 FFIEC adjusted median family income in the AA) could afford only a \$228,428 mortgage which below the 2019 median housing value \$238,896 and 2019 median home listing price of \$305,000.

The bank ranked 49th out of 134 lenders who made home mortgage loans to low-income borrowers in the AA with 0.43 percent market share which was good compared to its overall home mortgage loan ranking of 48th of 353 lenders and market share of 0.51 percent. Collectively, CBNA, Quicken Loans, Residential Mortgage Services, St. Mary's Bank and United Shore Financial Services, had a combined market share of 35.69. Market share for the top five lenders ranged from 4.09 percent to 11.58 percent.

Rockingham-Strafford MD AA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families within the AA and below the aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families within the AA and aggregate lending in the AA.

The assessment of performance considered the affordability of home ownership for low-income borrowers within the Rockingham-Strafford MD AA and the bank's market share to low-income families compared to its overall market share. As noted previously, home ownership for low-income borrowers within the Rockingham-Strafford MD AA during the evaluation period was not affordable. Specifically for this AA, assuming a 30-year mortgage with a 5 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$51,600 per year (or less than 50 percent of the 2019 FFIEC adjusted median family income in the AA) could afford only a \$240,303 mortgage which below the 2019 median housing value \$271,893 and 2019 median home listing price of \$327,400.

The bank ranked 68th out of 145 lenders who made home mortgage loans to low-income borrowers in the AA with 0.29 percent market share which is good compared to its overall home mortgage loan ranking of 65th of 394 lenders and market share of 0.31 percent. Collectively, CBNA, Quicken Loans, CMG Mortgage Inc, TD Bank and Residential Mortgage Services, had a combined market share for home mortgage loans to low-income borrowers of 28.11. Market share for the top five lenders ranged from 3.44 percent to 10.69 percent.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to business in the state of New Hampshire is adequate.

Manchester-Nashua MSA AA

The borrower distribution of small loans to businesses is adequate. The percentage of bank loans to businesses with gross annual revenue of \$1 million or less was well below the percentage of those businesses but significantly exceeded the aggregate lending in the AA.

The assessment of performance considered the bank's lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. The bank ranked 20th out of 89 lenders with 0.33 percent market share for lenders making small loans to businesses with revenues less than \$1 million which exceeded its overall small business lending market share of 0.31 percent and ranking of 26th out of 89 small business lenders. Collectively, Citibank N. A, American Express National Bank, TD Bank N. A., Capital One Bank (USA) N. A. and Bank of America N. A., accounted for 67.53 percent of the market share for small loans to businesses with revenues of \$1 million or less based on 2018 data.

Rockingham-Strafford MD AA

The borrower distribution of small loans to businesses is poor. The percentage of bank loans to businesses with gross annual revenue of \$1 million or less was well below both the percentage of those businesses and the aggregate lending in the AA.

The assessment of performance considered the bank's lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. The bank ranked 27th out of 102 lenders with 0.09 percent market share for lenders making small loans to businesses with revenues less than \$1 million which was consistent with its overall small business lending market share of 0.10 percent and ranking of 46th out of 102 small business lenders. Collectively, American Express National Bank, Citibank N. A, TD Bank N. A., Bank of America N. A. and Capital One Bank (USA) N. A., accounted for 67.76 percent of the market share for small loans to businesses with revenues of \$1 million or less based on 2018 data.

Community Development Lending

The institution has made a relatively high level of CD loans in the state of New Hampshire.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Manchester-Nashua MSA AA

NBT had an adequate level of CD loans in the Manchester-Nashua MSA AA. During the evaluation period, NBT made one loan totaling \$1 million to a qualified CDFI based within the state of New Hampshire with a purpose of providing community services to the Manchester-Nashua MSA AA.

Rockingham-Strafford MD AA

NBT had a relatively high level of CD loans in the Rockingham-Strafford MD AA. During the evaluation period, NBT made one loan totaling \$8 million to a local community organization that provides affordable housing opportunities to families within the AA where approximately 50 percent of the housing units were priced at 60 percent of the area median income (AMI).

New Hampshire Statewide

NBT also made an additional affordable housing CD loan totaling \$3 million within the state of New Hampshire that did not have a specific purpose, mandate, or focus benefiting the AAs. The loan supported a local mobile home park in Sullivan County, NH that provided tenants with affordable housing, including six months of free rent per site location.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve credit needs within the state of New Hampshire. Innovative/flexible lending practices overall may vary but primarily consisted of both HMDA-reportable loan programs, such as FHA, USDA Rural, and First Home Loan programs, as well as CRA small business-reportable SBA 7a and 504 programs.

Manchester-Nashua MSA AA

NBT makes limited use of innovative and flexible lending practices in the Manchester-Nashua MSA AA. During the evaluation period, the bank originated five loans for \$984 thousand under the Home in the City LMI Loan program and one loan for \$270 thousand under the FHA program.

Rockingham-Strafford MD AA

NBT makes little use of innovative and flexible lending practices in the Rockingham-Strafford MD AA. During the evaluation period, the bank did not originate any loans under the programs available.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the NH Non-MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope area(s). The performance in the NH Non-MSA AA was weaker due to very poor geographic distribution of loans and no community development lending.

Refer to Tables O through R in the state of New Hampshire section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in New Hampshire is rated High Satisfactory.

Conclusions for Areas Receiving Full Scope Reviews

Based on full scope reviews, the bank's performance in the Manchester-Nashua MSA and Rockingham-Strafford MD AA(s) is good.

The institution has a significant level of qualified investments and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Manchester-Nashua MSA AA	1	3,693	16	1,423	17	70.8	5,116	67.1	0	0
Rockingham-Strafford MD AA	0	0	6	2,031	6	25.0	2,031	26.6	0	0
NH Non MSA AA	1	340	1	142	2	8.3	482	6.3	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments in the full-scope AAs include:

- One agency affordable housing MBS, of which \$1.4 million was allocated to the Manchester-Nashua MSA AA and \$1 million was allocated to the Rockingham-Strafford MD AA.
- One private-label affordable housing MBS of which \$977 thousand was allocated to the Rockingham-Strafford MD AA.
- Two grants totaling \$15 thousand to provide affordable housing for LMI individuals in the Manchester-Nashua MSA AA.

Manchester-Nashua MSA AA

The bank had a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community economic development needs. NBT made 16 qualified investments, donations, and grants to nine organizations totaling \$1.4 million in the Manchester-Nashua MSA AA during the evaluation period. The allocated portions of the affordable housing MBS noted above represented a substantial majority of the investment in this AA. As of December 31, 2019, the balance on prior period investments, an affordable housing bond, had a remaining balance of \$3.7 million allocated to the AA. Investments, donations and grants supported CD needs, primarily for affordable housing, and community services for LMI individuals.

Rockingham-Strafford MD AA

The bank had a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community economic development needs. NBT made six qualified investments, donations, and grants to three organizations totaling \$2 million in the Rockingham-Strafford MD AA during the evaluation period. The allocated portions of the affordable housing bond and private-label MBS noted above to the Rockingham-Strafford MD AA totaled \$2 million and represented almost the entirety of the investment in this AA. Investments, donations and grants supported CD needs, primarily for affordable housing purposes.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Investment Test in the NH Non-MSA AA is weaker than the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance in the NH Non-MSA AA is weaker due to the lower number and dollar amount of investments provided for the AA compared to the full-scope AAs.

SERVICE TEST

The bank's performance under the Service Test in New Hampshire is rated High Satisfactory.

Conclusions for Areas Receiving Full Scope Reviews

Based on full scope reviews, the bank's performance in the Manchester-Nashua MSA AA is outstanding and the bank's performance in the Rockingham-Stafford MD AA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Manchester-Nashua MSA AA	61.36	2	50.0	50.0	50.0	0.00	0.00	7.6	20.1	40.3	31.9
Rockingham-Stafford MD AA	6.27	1	25.0	0.00	0.00	0.00	100.0	1.4	20.9	56.8	20.9
NH Non MSA AA	32.38	1	25.0	0.00	0.00	100.0	0.00	0.0	10.8	76.5	12.7

Manchester-Nashua MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Manchester-Nashua MSA AA. NBT operated two branches in the AA. The bank operated one branch each in low- and moderate-income census tracts which was more than proportionate to the population distribution. The bank had two deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks which were co-located with the branches.

Rockingham-Strafford MD AA

NBT's delivery systems in the Rockingham-Strafford MD AA were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank operated one branch in the AA equipped with a cash dispensing ATM in an upper-income census tract and one stand alone, deposit taking ATM enhanced with deposit automation which provided faster access to funds and images of deposited checks. The stand alone, deposit taking ATM, while located in a middle-income census tract, was within two miles of a moderate-income census tract.

The assessment of performance considered the percent of population residing in the tracts and the distance from the bank's single branch to the census tracts. In the AA, only 1.4 percent of the population resided in the sole low-income census tract in the AA. The bank's only branch in the AA was 18 miles from the sole low-income census tract and eight miles from the nearest moderate-income census tract.

NBT did not open or close any branches during the evaluation period in the Manchester-Nashua MSA AA or the Rockingham-Strafford MD AA. NBT relocated the Keene branch located in the NH Non-MSA AA during the evaluation period within the same middle-income census tract.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals.

Manchester-Nashua MSA AA

In the Manchester-Nashua MSA AA, services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. Both branches had lobby hours Monday through Friday from 9:00 a.m. – 5:00 p.m. The Manchester branch offered extended hours on Saturdays from 9:00 a.m. – 12:00 p.m. and drive-up hours were offered Monday-Friday from 8:30 a.m. – 5:00 p.m. and on Saturdays from 8:30 a.m. – 12:00 p.m.

Alternative delivery systems included services such as telephone, online and mobile banking. The bank reported nine customers from low-income census tracts and 15 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 63 Classic Checking customers from low-income census tracts in the AA and 140 Classic Checking customers from moderate-income census tracts in the AA.

Rockingham-Strafford MD AA

In the Rockingham-Strafford MD AA, services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The branch had lobby hours Monday through Friday from 8:30 a.m. – 5:00 p.m. The bank had one deposit taking ATM located in a middle-income census tract enhanced with deposit automation which provides faster access to funds and images of deposited checks.

Alternative delivery systems included services such as telephone, online and mobile banking. The bank reported four customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported four Classic Checking customers from low-income census tracts in the AA and 35 Classic Checking customers from moderate-income census tracts in the AA.

Community Development Services

The institution provides a high level of CD services.

Manchester-Nashua MSA AA

NBT provided a high level of CD services in the Manchester-Nashua MSA AA. During the evaluation period two employees provided 57.3 hours of qualifying service to organizations providing affordable housing for LMI and community services targeting LMI persons.

Rockingham-Stafford MD AA

NBT provided a low level of CD services in the Rockingham-Stafford MD AA. During the evaluation period, one employee provided 1.5 hours of qualifying services for an organization providing affordable housing for LMI persons.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the NH Non-MSA AA is weaker than the bank's overall performance under the Service Test in the full-scope area(s). The bank operated one branch in the NH Non-MSA AA, located in a middle-income census tract and had no community development services.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The geographic distribution of loans is good.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses and farms of different sizes is good.
- A relatively high level of CD loans in the state of New York.
- Extensive use of innovative and flexible lending products.
- The bank has an excellent level of qualified investments responsive to identified community needs, but generally not in a leadership role nor those that are not made by private investors.
- Service delivery systems are accessible to all geographies and individuals of different income levels.
- Services and business hours do not vary in a way that inconveniences LMI individuals or LMI areas.
- High level of community development services.

Description of Institution's Operations in New York

NBT had six assessment areas in the state of New York consisting of the Albany-Schenectady-Troy MSA AA (MSA #10580), Binghamton MSA AA (MSA #13780), Glens Falls MSA AA (MSA #24020), Syracuse MSA AA (MSA #45060), Utica-Rome MSA AA (MSA #46540), and non-metropolitan counties in New York (NY Non-MSA AA). The six contiguous AAs were in the central and northeastern parts of the state and bordered Pennsylvania to the south, Canada to the north and Massachusetts and Vermont to the east.

The Albany-Schenectady-Troy MSA AA consisted of all five counties in the MSA — Albany, Saratoga, Schenectady, Schoharie and Rensselaer Counties. The Binghamton MSA AA consisted of the two counties making up the MSA – Broome and Tioga Counties. The Glens Falls MSA AA consisted of the two counties making up the MSA – Warren and Washington Counties. The Syracuse MSA AA consisted of the three counties making up the MSA – Madison, Onondaga and Oswego Counties. The Utica-Rome MSA AA consisted of the two counties making up the MSA – Herkimer and Oneida

Counties. The NY Non-MSA AA consisted of 12 counties including Chenango, Clinton, Cortland, Delaware, Essex, Franklin, Fulton, Greene, Hamilton, Montgomery, Otsego and St. Lawrence Counties. For analysis purposes, we combined the 12 contiguous counties located in the non-metropolitan statistical areas of New York State to form the NY Non-MSA AA.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities include commercial banking, retail banking and wealth management services. Home mortgage loans was NBT's primary product in New York during the evaluation period accounting for 56.5 percent of loans made in New York. The bank faced strong competition for deposits and loans in the state.

NBT operated 104 full-service branch offices and 34 stand-alone, primarily cash-dispensing, ATMs in the state of New York as of December 31, 2019. The branches represented 71.23 percent of the bank's total branch network and most were equipped with deposit-taking ATMs. NBT reported \$6.2 billion in deposits, or 81.26 percent of the bank's total deposits, in the state of New York based on deposit market share information as of June 30, 2019. NBT ranked third out of 128 depository institutions with 7.52 percent market share for the state of New York AAs based on FDIC deposit market share reports for June 30, 2019. KeyBank and M&T Bank ranked first and second with market shares of 19.62 percent and 8.67 percent, respectively.

NBT originated and purchased 74.18 percent of its total home mortgage loans, 78.28 percent of its total small business loans and 98.14 percent of its total small farm loans in the state of New York AAs during the evaluation period.

Albany-Schenectady-Troy MSA AA

NBT operated 15 branches, most equipped with deposit taking ATMs, in the Albany-Schenectady-Troy MSA AA. The AA was in eastern NY and bordered Massachusetts and Vermont to the east. NBT operated four branches in Albany County, one branch in Rensselaer County, four branches in Saratoga County, two branches in Schenectady County, and four branches in Schoharie County. Of the 15 branches, one branch was in a low-income census tract in Albany County, one branch was in a low-income census tract in Schenectady County, one branch was in a moderate-income census tract in Saratoga County and two branches were in moderate-income census tracts in Schoharie County. The 15 branches accounted for 10.27 percent of NBT bank-wide branch network and 14.42 percent of the branches in New York as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$880.4 million in the Albany-Schenectady-Troy MSA AA which represented 11.52 percent of the bank's total deposits and 14.17 percent of the bank's total deposits in the state of New York. According to June 30, 2019 deposit market share information, NBT ranked 10th out of 47 depository institutions with a deposit market share of 2.37 percent. The top banks in terms of deposit market share in the AA included KeyBank with 30.01 percent, Citizens Bank N.A. with 12.78 percent, State Employees Credit Union with 9.75 percent, TrustCo Bank with 7.49 percent and Bank of America N. A. with 7.18 percent.

NBT originated and purchased 7.96 percent of its total home mortgage loans in the AA and 10.73 percent of home mortgage loans in the state in the Albany-Schenectady-Troy MSA AA during the evaluation period. NBT originated and purchased 10.32 percent of its total small business loans in the AA and 13.18 percent of small business loans in the state in the Albany-Schenectady-Troy MSA AA

during the evaluation period. NBT originated and purchased 6.36 percent of its total small farm loans in the AA and 6.48 percent of small farm loans in the state in the Albany-Schenectady-Troy MSA AA during the evaluation period.

Economic Data

According to the September 2019 Moody Analytics report, the MSA's economy was struggling despite the significant number of high-tech and state government jobs. While the number of federal jobs increased, these jobs were largely temporary 2020 Census positions. Despite the post-recession growth in semi-conductor manufacturing, manufacturing decreased in recent years. Much of the decrease was caused by layoffs at Global Foundries. Other weaknesses included a decline in the working age population and lack of growth in the private sector. Key sectors of the economy consisted of government, restaurants, and colleges.

According to December 31, 2019 U.S. Bureau of Labor Statistics, the unemployment rate (not seasonally adjusted) in the Albany-Schenectady-Troy MSA was 3.7 percent which was consistent with the state of New York's unemployment rate of 3.7 percent. Unemployment in the counties within the MSA ranged from a low of 3.5 percent in Saratoga County to 4.9 percent in Schoharie County. The top private employers included St. Peters Health Partners, Albany Medical Center, Golub Corporation, Hannaford Supermarkets, and General Electric.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Albany-Schenectady-Troy MSA AA to determine local economic conditions and community needs. Community contacts indicated a need for small business funding despite the overall strong economic conditions in the Capital Area. Affordable housing, newer or improved commercial and industrial sites, broadband access and improved water sewer infrastructure were needed in Saratoga County. One contact identified homeless and poverty as problems in the city of Schenectady. Affordable housing, youth programs and food assistance programs were needed in the city of Schenectady. Rehabilitation of aging housing stock was needed to address problems with dilapidated housing. In addition, the city of Schenectady had a growing immigrant population with limited English skills

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albany-Schenectady-Troy MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	218	9.6	19.7	47.7	21.1	1.8
Population by Geography	877,846	7.4	18.0	49.7	23.8	1.1
Housing Units by Geography	396,148	8.5	19.8	49.6	21.9	0.2
Owner-Occupied Units by Geography	224,922	2.9	14.6	54.7	27.8	0.0
Occupied Rental Units by Geography	121,066	15.6	25.6	42.9	15.6	0.3
Vacant Units by Geography	50,160	16.7	28.8	43.4	10.5	0.6
Businesses by Geography	56,499	11.5	12.9	48.1	27.0	0.5
Farms by Geography	1,770	1.6	12.7	65.0	20.7	0.1
Family Distribution by Income Level	208,866	20.3	17.8	22.2	39.7	0.0
Household Distribution by Income Level	345,988	24.2	15.6	18.8	41.3	0.0
2019 Median Family Income MSA — 10580 Albany-Schenectady-Troy, NY MSA		\$89,900	Median Housing Value			\$195,916
			Median Gross Rent			\$911
			Families Below Poverty Level			7.3%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

NY Non-MSA AA

NBT operated 51 branches, most equipped with deposit-taking ATMs, and 20 stand-alone, primarily cash-dispensing, ATMs in the NY Non-MSA AA. NBT's NY Non-MSA AA spans from the Adirondack Region which borders Canada to the north, down through NY's Central Region, south to NY's Hudson Valley Region, which borders Pennsylvania, and east to NY's Capital Region which borders the Albany-Schenectady-Troy MSA AA.

NBT operated 11 branches in Chenango County, three branches in Clinton County, four branches in Cortland County, five branches in Delaware County, three branches in Essex County, one branch in Franklin County, five branches in Fulton County, one branch in Greene County, one branch in Hamilton County, five branches in Montgomery County, eight branches in Otsego County and four branches in St. Lawrence County. Of the 51 branches, one branch was in a moderate-income census tract in Delaware County and two branches were in moderate-income census tracts in Montgomery County. Additionally, the branch in Hamilton County and three branches in St. Lawrence County were in distressed or underserved middle-income census tracts. The 51 branches accounted for 34.93 percent of NBT bank-wide branch network and 49.04 percent of the branches in New York as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$3.3 billion in the NY Non-MSA AA which represented 43.52 percent of the bank's total deposits and 53.56 percent of the bank's deposits in the state of New York. According to June 30, 2019 deposit market share information,

NBT ranked first out of 48 depository institutions with a deposit market share of 25.44 percent. Other top banks in terms of deposit market share in the AA included CBNA with 14.18 percent, KeyBank with 12.01 percent, The Bank of Greene County with 6.28 percent and SeaComm FCU with 3.57 percent.

NBT originated and purchased 32.12 percent of its total home mortgage loans in the AA and 43.30 percent of home mortgage loans in the state in the NY Non-MSA AA during the evaluation period. NBT originated and purchased 26.55 percent of its total small business loans in the AA and 33.92 percent of small business loans in the state in the NY Non-MSA AA during the evaluation period. NBT originated and purchased 56.12 percent of its total small farm loans in the AA and 57.19 percent of small farm loans in the state in the NY Non-MSA AA during the evaluation period.

Economic Data

The NY Non-MSA AA includes Clinton, Essex, Franklin, Hamilton and St. Lawrence Counties in NY's Adirondack Region. The Adirondack Region included the Adirondack Park which spans six million acres consisting of state- and privately-owned lands which have tight controls on land usage. Key economic drivers of the Adirondack Region of the AA included forestry, agriculture, hospitality, healthcare, and education.

The NY Non-MSA AA includes Chenango, Cortland and Otsego Counties in NY's Central Region, Delaware and Greene Counties in NY's Hudson Valley Region and Fulton and Montgomery Counties in NY's Capital Region. The Counties in these regions are primarily rural with small towns throughout and a few, more heavily populated areas spread throughout each county. Delaware County, in particular, was sparsely populated as approximately 50 percent of the County's land area was part of the New City Watershed that supplies unfiltered water supply to New York City and several surrounding counties. There are numerous regulatory restrictions limiting development in the watershed area in order to protect water quality. Key economic drivers included forestry, agriculture, hospitality, recreation, healthcare, and education.

According to December 2019 U.S. Bureau of Labor Statistics, unemployment rates (not seasonally adjusted) in the AA ranged from a low of 4.7 percent in Clinton and Otsego Counties to a high of 5.7 percent in St. Lawrence County. The exception to the range was Hamilton County with a 9.6 percent unemployment rate. As of this same date, all counties in the AA had higher unemployment rates than the state of New York's 3.7 percent unemployment rate.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the NY Non-MSA AA to determine local economic conditions and community needs. One contact noted much of the AA's economy is tied to tourism and agriculture; employment is seasonal. In addition, population growth varies within the AA. According to one contact, the population is growing in Fulton and St. Lawrence Counties due to the presence of higher education institutions. But the population is aging in many areas as younger individuals leave the area. Needs identified included affordable childcare, access to transportation, and funding to support the transition of small businesses to new ownership as older business owners retire or seek to close their businesses. In addition, affordable housing and down payment assistance was needed. According to a social service organization covering the south/central portion of the AA, the economy was sluggish. In addition, there are pockets of very high childhood poverty throughout the area. Identified needs included

mental health providers for children and adolescents, treatment facilities for chemical dependency, access to affordable housing, rehabilitation of older housing stock, and affordable childcare.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	2.2	9.5	69.8	14.5	3.9
Population by Geography	648,237	1.4	9.9	71.0	15.1	2.5
Housing Units by Geography	336,062	1.5	9.0	75.0	14.4	0.1
Owner-Occupied Units by Geography	177,671	0.8	7.8	76.2	15.2	0.0
Occupied Rental Units by Geography	71,396	3.9	16.8	64.6	14.6	0.1
Vacant Units by Geography	86,995	1.0	5.1	81.2	12.6	0.1
Businesses by Geography	33,633	2.1	10.7	69.1	17.6	0.4
Farms by Geography	2,239	0.3	6.1	80.5	13.1	0.0
Family Distribution by Income Level	157,787	21.5	17.3	21.5	39.6	0.0
Household Distribution by Income Level	249,067	25.1	15.8	18.0	41.1	0.0
2019 Median Family Income Non-MSAs — NY		\$66,200	Median Housing Value			\$124,762
			Median Gross Rent			\$718
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Syracuse MSA AA

NBT operated 19 branches, most equipped with deposit-taking ATMs, and seven stand-alone, primarily cash-dispensing ATMs in the Syracuse MSA AA. The AA was in the center of New York state. NBT operated four branches in Madison County, 11 branches in Onondaga County and four branches in Oswego County. Of the 19 branches, one branch was in a low-income census tract in Onondaga County, two branches were in moderate-income census tracts in Madison County, one branch was in a moderate-income census tract in Onondaga County and one branch was in a moderate-income census tract in Oswego County. The 19 branches accounted for 13.01 percent of the NBT bank-wide branch network and 18.27 percent of the branches in New York as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$841 million in deposits in the Syracuse MSA AA which represented 11.01 percent of the bank's total deposits and 13.55 percent of the bank's deposits in the state of New York. According to June 30, 2019 deposit market share information, NBT ranked seventh out of 32 depository institutions with a deposit market share of 5.44 percent. The top banks in terms of deposit market share in the AA included M&T Bank with 20.40 percent, KeyBank with 16.47 percent, Empower FCU with 10.55 percent, JP Morgan Chase Bank N. A. with 7.92 percent and Bank of America N. A. with 7.29 percent.

The bank's primary business focus in the AA was retail and commercial banking. NBT originated and purchased 16.65 percent of its total home mortgage loans in the AA and 22.45 percent of home mortgage loans in the state in the Syracuse MSA AA during the evaluation period. NBT originated and purchased 18.45 percent of its total small business loans in the AA and 23.58 percent of small business loans in the state in the Syracuse MSA AA during the evaluation period. NBT originated and purchased 16.90 percent of its total small farm loans in the AA and 17.22 percent of small farm loans in the state in the Syracuse MSA AA during the evaluation period.

Economic Data

According to the September 2019 Moody Analytics report, the Syracuse MSA was in the late expansion phase of the business cycle and benefited from the stable presence of Syracuse University, below average unemployment volatility, and affordable housing. Despite these strengths, the area experienced an outflow of college educated young adults and a lack of dynamic growth in manufacturing outside of the defense industry. The key sectors of the economy include local government, health care, casinos, retail services, and manufacturing.

According to December 2019 U.S. Bureau of Labor Statistics, the unemployment rate (not seasonally adjusted) in the Syracuse MSA was 4.5 percent with 5.0 percent unemployment in Madison County, 4.1 percent in Onondaga County and 6.0 percent in Oswego County. As of this same date, the AA's unemployment was slightly higher than the state of New York's unemployment rate of 3.7 percent. Top employers include Upstate Medical University, St. Joseph's Health, Oneida Indian Nation Enterprises, Wal-Mart, and Syracuse University.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from two community contacts conducted during the evaluation period within the Syracuse MSA AA to determine local economic conditions and community needs. According to the contacts, high poverty rates are extremely high in the city of Syracuse. This fact makes it difficult for the affordable housing organizations to find qualified borrowers. Other identified needs include small loans (i. e. micro loans) for startup capital for small businesses. Many small businesses lack complete financial information or credit history which make it difficult for traditional lending.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	186	12.4	18.8	40.9	24.7	3.2
Population by Geography	661,914	9.3	16.7	45.4	27.2	1.3
Housing Units by Geography	289,354	9.0	18.4	46.2	25.5	0.9
Owner-Occupied Units by Geography	172,959	2.6	14.0	51.7	31.6	0.1
Occupied Rental Units by Geography	83,270	19.1	26.5	35.5	16.2	2.7
Vacant Units by Geography	33,125	16.6	21.4	44.6	16.7	0.7
Businesses by Geography	38,525	8.0	14.4	43.8	31.5	2.4
Farms by Geography	1,415	2.3	11.8	53.5	31.8	0.6
Family Distribution by Income Level	160,300	21.8	17.2	20.4	40.6	0.0
Household Distribution by Income Level	256,229	24.9	15.6	17.4	42.1	0.0
2019 Median Family Income MSA — 45060 Syracuse, NY MSA		\$79,500	Median Housing Value			\$124,267
			Median Gross Rent			\$766
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Utica-Rome MSA AA

NBT operated nine branches, most equipped with deposit-taking ATMs, and four stand-alone, cash dispensing ATMs in the Utica-Rome MSA AA. The AA was the center of the state. NBT operated two branches in Herkimer County and seven branches in Oneida County. Of the nine branches, two branches were in low-income census tracts in Oneida County. The nine branches accounted for 6.16 percent of NBT bank-wide branch network and 8.65 percent of the branches in New York as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$636 million in deposits in the Utica-Rome MSA AA which represented 8.32 percent of the bank's total deposits and 10.24 percent of the bank's total deposits in the state of New York. According to June 30, 2019 deposit market share information, NBT ranked fifth out of 23 depository institutions with a deposit market share of 8.95 percent. The top banks in terms of deposit market share in the AA included AmeriCu Credit Union with 20.38 percent, Bank of Utica with 12.55 percent, M&T Bank with 9.98 percent, Adirondack Bank with 8.98 percent and NBT.

The bank's primary business focus in the AA was retail and commercial banking. NBT originated and purchased 9.72 percent of its total home mortgage loans in the AA and 13.10 percent of home mortgage loans in the state in the Utica-Rome MSA AA during the evaluation period. NBT originated and purchased 12.15 percent of its total small business loans in the AA and 15.52 percent of small business loans in the state in the Utica-Rome MSA AA during the evaluation period. NBT originated and

purchased 12.09 percent of its total small farm loans in the AA and 12.32 percent of small farm loans in the state in the Utica-Rome MSA AA during the evaluation period.

Economic Data

According to the September 2019 Moody Analytics report, the Utica-Rome MSA economy was in the recovery stage of the business cycle and had experienced a shrinking workforce and a lack of diverse industries and high wage jobs. Over the last 20 years, the Utica -Rome MSA had the smallest percentage of working age population in the state of New York. Employment in casinos, local government, and leisure and hospitality has decreased. Manufacturing has fallen nearly three quarters since its peak in the 1970s. Although manufacturing increased over the last 10 years, the number of manufacturing jobs decreased in recent years because of concerns about tariffs and trade. There has been slow expansion in health care and financial services. Key sectors of the economy include local government, healthcare, and casinos.

According to December 2019 U.S. Bureau of Labor Statistics, the unemployment rate (not seasonally adjusted) in the Utica-Rome MSA was 4.7 percent with 5.4 percent unemployment in Herkimer County and 4.5 percent unemployment in Oneida County which was higher than the state of New York's unemployment rate of 3.7 percent. The top private employers included the Oneida Indian Nation Enterprise, Mohawk Valley Network, and Flaxton St Luke's Health Care.

Community Contacts

The OCC did not conduct any community contacts in the Utica-Rome MSA but leveraged information from the City of Rome's 2020-2024 Consolidated Plan to identify community credit needs. The consolidated plan identified a critical need for housing for individuals and families living at or below the area median family income. Other needs included housing rehabilitation for the aging housing stock and improvement of city infrastructure including streets, sidewalks, parks. The consolidated plan cited a high local tax system and state of New York building codes as potential barriers impacting home ownership.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Utica-Rome MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	15.1	10.8	48.4	19.4	6.5
Population by Geography	297,592	11.7	10.2	53.0	23.3	1.8
Housing Units by Geography	137,351	11.7	11.3	53.0	23.9	0.0
Owner-Occupied Units by Geography	78,231	5.0	7.2	60.0	27.8	0.0
Occupied Rental Units by Geography	38,743	22.9	20.5	42.7	13.9	0.0
Vacant Units by Geography	20,377	15.9	9.8	45.8	28.3	0.2
Businesses by Geography	14,676	11.9	13.5	47.8	25.4	1.5
Farms by Geography	774	1.3	3.0	72.2	23.5	0.0
Family Distribution by Income Level	73,125	22.0	16.9	21.5	39.6	0.0
Household Distribution by Income Level	116,974	24.7	16.2	17.2	41.9	0.0
2019 Median Family Income MSA — 46540 Utica-Rome, NY MSA		\$70,400	Median Housing Value			\$113,672
			Median Gross Rent			\$694
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New York

The OCC conducted full-scope reviews of the Albany-Schenectady-Troy MSA AA, NY Non-MSA AA, Syracuse MSA AA and Utica-Rome MSA AA and limited-scope reviews of the Binghamton MSA AA and Glens Falls MSA AA. The four full-scope assessment areas accounted for 91.5 percent of deposits, 88.5 percent of loans and 90.4 percent of branches in the state of New York. The NY Non-MSA AA received the highest weighting as it represented 53.6 percent of the state's total deposits, 40.7 percent of the state's total loans and 49.0 percent of the state's branches. The additional AAs were selected to perform a comprehensive evaluation of the bank's CRA performance in the state of New York. Home mortgage loans, which accounted for 56.5 percent of loans made in the state's AAs during the evaluation period, were given more weight than small business loans and small farm loans which represented 37.3 percent and 6.2 percent of the bank's lending, respectively, in the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's performance under the Lending Test in New York is rated High Satisfactory.

Conclusions for Areas Receiving Full Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany-Schenectady-Troy MSA AA, NY Non-MSA AA and the Syracuse MSA AA is good. Based on a full-scope review, the bank's performance in the Utica-Rome MSA AA is adequate.

Lending Activity

Lending levels reflects good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Albany-Schenectady-Troy MSA AA	620	502	41	10	1,173	11.4	14.2
NY Non-MSA AA	2,502	1,292	362	9	4,165	40.6	53.6
Syracuse MSA AA	1,297	898	109	12	2,316	22.6	13.6
Utica-Rome MSA AA	757	591	78	8	1,434	14.0	10.2
Binghamton MSA AA	367	328	18	7	720	7.0	6.9
Glens Falls MSA AA	235	198	25	1	459	4.4	1.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Albany-Schenectady-Troy MSA AA	177,714	72,430	3,313	28,009	281,466	17.9	14.2
NY Non-MSA AA	274,728	154,173	28,380	30,130	487,411	31.0	53.6
Syracuse MSA AA	203,256	123,270	10,677	50,688	387,891	24.7	13.6
Utica-Rome MSA AA	96,429	89,480	7,871	27,303	221,083	14.1	10.2
Binghamton MSA AA	34,044	35,773	1,687	29,760	101,264	6.4	6.9
Glens Falls MSA AA	55,399	32,343	3,174	1,400	92,316	5.9	1.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albany-Schenectady-Troy MSA AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$880.4 million in deposits in the Albany-Schenectady-Troy MSA AA. As of June 30, 2019, the bank ranked 10th out of 47 depository institutions, or the 79th percentile, with 2.37 percent deposit market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 24th out of 293 lending institutions for home mortgage loan originations and purchases, or the 92nd percentile, with a 0.99 percent market share demonstrating good responsiveness to credit needs. The top five home mortgage lenders, SEFCU Services LLC, Homestead Funding Corp., TrustCo Bank, SEFCU and Capital Communications Federal, had a combined market share of 36.23 percent. Market share for the top five lenders ranged from 5.29 percent to 9.69 percent.

Based on 2018 CRA small business loan data, the bank ranked 17th out of 101 small business lenders, or the 83rd percentile, with a 1.03 percent market share demonstrating good responsiveness to credit needs. The top five small business lenders in the market, American Express National Bank, Chase Bank USA N. A., Bank of America N. A., Citibank, N. A., and Capital One Bank (USA) N. A., had a combined market share of 60.66 percent. Market share for the top five lenders ranged from 6.17 percent to 22.42 percent.

Based on 2018 CRA small farm loan data, the bank ranked fourth out of 15 small farm lenders, or the 73rd percentile, with a 9.16 percent market share demonstrating excellent responsiveness to credit needs. The top five small farm lenders in the market, Chase Bank USA N. A., Capital One Bank (USA) N. A., Wells Fargo Bank, N. A., NBT, and Bank of America N. A., had a combined market share of 70.98 percent. Market share for the top five lenders ranged from 7.63 percent to 32.06 percent.

NY Non-MSA AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$3.3 billion in deposits in the NY Non-MSA AA. As of June 30, 2019, the bank ranked first out of 48 depository institutions, or the 98th percentile, with 25.44 percent deposit market share in the AA.

Based on 2019 HMDA market share data, NBT ranked second out of 292 lending institutions for home mortgage loan originations and purchases, or the 99th percentile, with an 8.19 percent market share demonstrating good responsiveness to credit needs. The top five home mortgage lenders, CBNA, NBT, Quicken Loans, Homestead Funding Corp, and KeyBank, had a combined market share of 37.01 percent. Market share for the top five lenders ranged from 5.16 percent to 10.51 percent.

Based on 2018 CRA small business loan data, the bank ranked seventh out of 89 small business lenders, or the 92nd percentile, with a 5.24 percent market share demonstrating good responsiveness to credit needs. The top five small business lenders in the market, American Express National Bank, Chase Bank USA N. A., Synchrony Bank, US Bank N. A. and Capital

One Bank (USA) N. A., had a combined market share of 51.23 percent. Market share for the top five lenders ranged from 6.68 percent to 19.38 percent.

Based on 2018 CRA small farm loan data, the bank ranked first out of 23 small farm lenders, or the 96th percentile, with a 29.76 percent market share demonstrating excellent responsiveness to credit needs. The top five small farm lenders in the market, NBT, John Deere Financial, F.S.B, Wells Fargo Bank, N. A., Chase Bank USA N. A. and CBNA had a combined market share of 67.87 percent. Market share for the top five lenders ranged from 7.49 percent to 29.76 percent.

Syracuse MSA AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$841.4 million in deposits in the Syracuse MSA AA. As of June 30, 2019, the bank ranked seventh out of 32 depository institutions, or the 78th percentile, with 5.44 percent deposit market share in the AA.

Based on 2019 HMDA market share data, NBT ranked eighth out of 293 lending institutions for home mortgage loan originations and purchases, or the 97th percentile with a 3.22 percent market share demonstrating good responsiveness to credit needs. The top five home mortgage lenders in the market, Empower FCU, Wells Fargo Bank, N. A., M&T Bank, KeyBank and AmeriCu Credit Union, had a combined market share of 34.23 percent. Market share for the top five lenders ranged from 3.66 percent to 15.95 percent.

Based on 2018 CRA small business loan data, the bank ranked 11th out of 98 small business lenders, or the 89th percentile, with a 2.81 percent market share demonstrating good responsiveness to credit needs. The top five small business lenders in the market, American Express National Bank, Chase Bank USA N. A., Citibank N. A., Bank of America N. A. and US Bank N. A., had a combined market share of 50.97 percent. Market share for the top five lenders ranged from 5.97 percent to 18.34 percent.

Based on 2018 CRA small farm loan data, the bank ranked first out of 16 small farm lenders, or the 94th percentile, with a 20.67 percent market share demonstrating excellent responsiveness to credit needs. The top five small farm lenders in the market, NBT, Chase Bank USA N. A., John Deere Financial, F.S.B, Wells Fargo Bank, N. A., and US Bank N. A., had a combined market share of 68.67 percent. Market share for the top five lenders ranged from 9.33 percent to 20.67 percent.

Utica-Rome MSA AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$636.3 million in deposits in the Utica-Rome MSA AA. As of June 30, 2019, the bank ranked fifth out of 23 depository institutions, or the 78th percentile, with 8.95 percent deposit market share in the AA.

Based on 2019 HMDA market share data, NBT ranked sixth out of 158 lending institutions for home mortgage loan originations and purchases, or the 96th percentile, with a 4.40 percent market share demonstrating good responsiveness to credit needs. The top five home mortgage lenders in

the market, AmeriCu Credit Union, First Source FCU, Adirondack Bank, Quicken Loans, and Plaza Home Mortgage Inc., had a combined market share of 37.24 percent. Market share for the top five lenders ranged from 4.85 percent to 11.68 percent.

Based on 2018 CRA small business loan data, the bank ranked seventh out of 73 small business lenders, or the 90th percentile, with a 5.01 percent market share demonstrating good responsiveness to credit needs. The top five small business lenders in the market, American Express National Bank, Chase Bank USA N. A., US Bank, N. A., Synchrony Bank, and Capital One Bank (USA) N. A., had a combined market share of 49.24 percent. Market share for the top five lenders ranged from 5.62 percent to 18.61 percent.

Based on 2018 CRA small farm loan data, the bank ranked fifth out of 12 small farm lenders, or the 92nd percentile, with a 24.58 percent market share demonstrating excellent responsiveness to credit needs. The top five small farm lenders in the market, NBT, John Deere Financial, F.S.B, US Bank N. A, Bank of America N. A., and CBNA, had a combined market share of 76.27 percent. Market share for the top five lenders ranged from 8.47 percent to 24.58 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the state of New York is good.

Albany-Schenectady-Troy MSA

The geographic distribution of home mortgage loans is good. The geographic distribution of home mortgage loans in low-income census tracts was near both the percentage of owner-occupied housing units and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing units and aggregate lending in the AA.

NY Non-MSA

The geographic distribution of home mortgage loans is good. The geographic distribution of home mortgage loans in low-income census tracts was well below both the percentage of owner-occupied housing units and aggregate lending in the AA. The distribution of home mortgage loans in moderate-income income census tracts was near both the percentage of owner-occupied housing units and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the distance from low-income census tracts to the nearest branch and AA competition. Four of the bank's five branches in Montgomery County were in excess of 10 to 22 miles from these low-income census tracts. NBT faced

competition from several credit unions, mortgage companies and online lenders. In 2019, the top five home mortgage lenders in low-income census tracts, Sunmark FCU, Homestead Funding, SEFCU, Nationstar Mortgage, and Quicken Loans, had a combined market share of 38.4 percent in the low-income census tracts.

In evaluating geographic distribution, we also considered the bank's record of home mortgage lending in the distressed and/or underserved census tracts in the AA. NBT originated 172 loans totaling \$18.3 million in middle-income distressed and/or underserved census tracts in St. Lawrence and Hamilton Counties during the evaluation period.

Syracuse MSA AA

The geographic distribution of home mortgage loans is adequate. The geographic distribution of home mortgage loans in low-income census tracts was significantly below the percentage of owner-occupied housing and well below aggregate lending in the AA. The distribution of home mortgage loans in moderate-income census tracts significantly exceeded both the percentage of owner-occupied housing and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the bank's market share in low-income tracts compared to its overall market share and AA competition. Based on 2019 HMDA market share data, NBT ranked 10th out of 62 lenders for home mortgage loans in low-income census tracts with 2.47 percent market share which is good compared to the bank's overall home mortgage lending market share of 3.22 percent. NBT faced competition from 61 other lenders including several credit unions, mortgage companies and large banks. In 2019, the top five home mortgage lenders in low-income census tracts, Empower FCU, Wells Fargo Bank, N. A., Solvay Bank, Commonfund Mortgage Corp., and M&T Bank, had a combined market share of 34.63 percent in the low-income census tracts.

Utica -Rome MSA AA

The geographic distribution of home mortgage loans is poor. The geographic distribution of home loans in low-income census tracts was significantly below both the percentage of owner-occupied housing and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was below both the percentage of owner-occupied census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered AA competition. NBT faced competition from 54 other lenders including several credit unions, mortgage companies and large banks. In 2019, the top five home mortgage lenders in low-income census tracts, KeyBank, First Source Credit Union, Plaza Home Mortgage Inc., AmeriCu Credit Union and Adirondack Bank, had a combined market share of 39.8 percent in the low-income census tracts.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in the state of New York is good.

Albany-Schenectady-Troy MSA AA

The geographic distribution of small loans to businesses is good. The geographic distribution of small loans to businesses in low-income census tracts was near the proportion of businesses in low-income census tracts but significantly exceeded aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts significantly exceeded both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

NY Non-MSA AA

The geographic distribution of small loans to businesses is good. The geographic distribution of small loans to businesses in low-income census tracts was well below both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts significantly exceeded both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the distance from low-income census tracts to the nearest branch and AA competition. All four of the low-income census tracts in the AA were in Montgomery County. Four of the bank's five branches in Montgomery County were in excess of 10 to 22 miles from these low-income census tracts. NBT faced competition from credit card companies, large banks and multi-national companies. In 2018, the top five lenders in low-income census tracts, American Express National Bank, Capital One Bank (USA) N. A., Synchrony Bank, KeyBank, and Chase Bank USA N. A., had a combined market share of 60.09 percent in the low-income census tracts.

In evaluating geographic distribution, we also considered the bank's record of small loans to businesses in the distressed and/or underserved census tracts in the AA. NTB originated 44 small loans to businesses totaling \$6.2 million in middle-income distressed and/or underserved census tracts in St. Lawrence and Hamilton Counties during the evaluation period.

Syracuse MSA AA

The geographic distribution of small loans to businesses is adequate. The geographic distribution of small loans to businesses in low-income census tracts was well below both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was near the proportion of businesses in moderate-income census tracts and exceeded aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the significant level of competition in the low-income census tracts from competition from credit card companies, large banks and multi-national companies. In 2018, the top five lenders in low-income census tracts, American Express National Bank, Chase Bank USA N. A., Citibank N. A., Bank of America N. A., and M&T Bank, had a combined market share of 57.65 percent in the low-income census tracts.

Utica-Rome MSA AA

The geographic distribution is of small loans to businesses good. The geographic distribution of small loans to businesses in low-income census tracts was near both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to

businesses in moderate-income census tracts significantly exceeded the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

Small Loans to Farms

Refer to Table S in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small farm loans in the state of New York is good.

Albany-Schenectady-Troy MSA AA

The geographic distribution of small loans to farms is good. The bank did not originate any small loans to farms in low-income census tracts during the evaluation period. The geographic distribution of small loans to farms in moderate-income census tracts significantly exceeded both the proportion of small farms in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of farms, 28 farms, in low-income census tracts in the AA. According to 2018 market share data, only one small loan to farms was originated in a low-income census tract by all lenders suggesting low loan demand.

NY Non-MSA AA

The geographic distribution of loans is good. The bank did not originate any small loans to farms in low-income census tracts during the evaluation period. The geographic distribution of small loans to farms in moderate-income census tracts significantly exceeded both the proportion of farms in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of farms, seven farms, in low-income census tracts in the AA. According to 2018 market share data, only one small loan to farms was originated in a low-income census tract by all lenders suggesting low loan demand. As previously mentioned all four of the low-income census tracts in the AA were in Montgomery County. In contrast, four of the bank's five branches in Montgomery County were in excess of 10 to 22 miles from the low-income census tracts.

In evaluating geographic distribution, we also considered the bank's record of small loans to farms in the distressed and/or underserved census tracts in the AA. NTB originated five small loans to farms totaling \$699 thousand in middle-income distressed census tracts in St. Lawrence County during the evaluation period.

Syracuse MSA AA

The geographic distribution of loans is good. The bank did not originate any small loans to farms in low-income census tracts during the evaluation period. The geographic distribution of small loans to farms in moderate-income census tracts significantly exceeded both the proportion of farms in moderate-income census tracts and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of farms, 33 farms, in low-income census tracts in the AA. According to 2018 market share data, only one small loan to farms was originated in a low-income census tract by all lenders suggesting low loan demand.

Utica-Rome MSA AA

The geographic distribution of loans is adequate. The bank did not originate any small loans to farms in low-income census tracts or moderate-income census tracts during the evaluation period. The assessment of performance considered the limited of farms in low- and moderate-income census tracts which totaled 10 farms and 23 farms, respectively. According to 2018 market share data, no lenders originated small loans to farms in low-income census tracts and one small loan to farms was originated in a moderate-income census tract suggesting low loan demand.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage, small loans to businesses and small loans to farms during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

NBT exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower income distribution of home mortgage loans in the state of New York is good.

Albany-Schenectady-Troy MSA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but significantly exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was near aggregate lending in the AA.

NY Non MSA AA

The borrower income distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but significantly exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near both the percentage of moderate-income families and aggregate lending in the AA.

Syracuse MSA AA

The borrower income distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was near aggregate lending in the AA.

Utica-Rome MSA AA

The borrower income distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses

The borrower distribution of small loans to businesses in the state of New York is good.

Albany-Schenectady-Troy MSA AA

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses but significantly exceeded aggregate lending in the AA.

The assessment of performance considered the bank's percentage of very small business loans, the lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. The majority of NBT's small loans to businesses, 68.3 percent, were for amounts less than or equal to \$100 thousand with an average loan amount of \$53 thousand. In 2018, the bank ranked 14th out of 101 lenders with 1.43 percent market share for lenders making small loans to businesses with revenues of \$1 million or less than which significantly exceeded its overall small business lending market share of 1.03 percent and ranking of 17th out of 101 lenders. Collectively, American Express National Bank, Citibank N. A., Bank of America N. A., Chase Bank USA N. A., and Capital One Bank (USA) N. A., had a combined market share of 63.32 percent. Four of the five institutions had an average loan size between \$6 thousand and \$13 thousand for loans to small-sized businesses which is indicative of credit card lending. While NBT does not originate credit cards, it does refer customers to a third-party credit card originator.

NY Non-MSA AA

The borrower distribution of small loans to business is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses but significantly exceeded aggregate lending in the AA.

Syracuse MSA AA

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage those businesses but near aggregate lending in the AA.

The assessment of performance considered the bank's percentage of very small business loans, the lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. The majority of NBT's small loans to businesses, 67.5 percent, were for amounts less than or equal to \$100 thousand with an average loan amount of \$36 thousand. In 2018, the bank ranked 11th out of 98 lenders with 2.72 percent market share for lenders making small loans to businesses with revenues of \$1 million or less than which was good compared to its overall small business lending market share of 2.81 percent and ranking of 11th out of 98 lenders. Collectively, Citibank NA, American Express National Bank, US Bank N. A., Chase Bank USA N. A., and M&T Bank had a combined market share of 58.82 percent. Four of the five institutions had an average loan size between \$5 thousand and \$15 thousand for loans to small-sized businesses which is indicative of credit card lending. While NBT does not originate credit cards, it does refer customers to a third-party credit card originator.

Utica-Rome MSA AA

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage those businesses but exceeded aggregate lending in the AA.

The assessment of performance considered the bank's percentage of very small business loans, the lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. The majority of NBT's small loans to businesses, 64.6 percent, were for amounts less than or equal to \$100 thousand with an average loan amount of \$42 thousand. In 2018, the bank ranked eighth out of 73 lenders with 5.37 percent market share for lenders making small loans to businesses with revenues of \$1 million or less than which significantly exceeded its overall small business lending market share of 5.01 percent and ranking of seventh out of 73 lenders. Collectively, American Express National Bank, US Bank NA, Citibank N. A., Bank of Utica, and Capital One Bank (USA) had a combined market share of 56.50 percent. Four of the five institutions had an average loan size between \$6 thousand and \$10 thousand for loans to small-sized businesses which is indicative of credit card lending. While NBT does not originate credit cards, it does refer customers to a third-party credit card originator.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small farms.

The borrower distribution of small loans to farms in the state of New York is good.

Albany-Schenectady-Troy MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but significantly exceeded aggregate lending in the AA.

NY Non-MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but significantly exceeded aggregate lending in the AA.

Syracuse MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but significantly exceeded aggregate lending in the AA.

Utica-Rome MSA AA

The borrower distribution of small loans to farms is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but significantly exceeded aggregate lending in the AA.

Community Development Lending

The institution has made a relatively high level of CD loans in the state of New York.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Albany-Schenectady-Troy MSA AA

NBT has made a relatively high level of CD loans. During the evaluation period, NBT originated 10 CD loans totaling \$28.0 million in the AA. Four CD loans totaling \$20.3 million supported economic development and two CD loans totaling \$2.6 million provided funding to revitalize and stabilize low-income census tracts targeted for redevelopment. Four CD loans totaling \$5.1 million financed 160 affordable housing units for low-income and moderate-income individuals. CD loans were responsive to identified affordable housing and economic development needs in the AA.

Examples of notable CD loans include:

- A \$15 million loan that financed a small business lending nonprofit organization.
- A \$2.6 million loan to finance the construction of 20 affordable housing units for formerly homeless individuals with serious mental illnesses.

- A \$1.4 million loan to finance the renovation of two abandoned properties for retail and residential use in the city of Albany. Additional funding for this project included historical tax credits and New York State Consolidated Application Grant.

NY Non-MSA AA

NBT originated a relatively high level of CD loans. During the evaluation period, NBT originated nine CD loans totaling \$30.1 million in the AA in six of the 12 counties in the AA (Chenango, Delaware, Cortland, Clinton and St. Lawrence). Five CD loans totaling \$17 million supported economic development. Two CD loans totaling \$2.1 million funded community service activities. One CD loan for \$2.0 million funded revitalization and stabilization efforts in targeted areas. CD loans were responsive to identified community economic development and affordable housing needs in the AA.

Notable community development loans include:

- A \$9.0 million loan to finance the construction of a 40-unit affordable housing project. This project included additional from low-income housing tax credits and Housing Trust Grants.
- A \$5.0 million loan originated through the Upstate New York Revitalization Initiative. This loan assisted a business to retain needed jobs in the AA.
- A \$2.0 loan to finance a hospital serving a moderate-income census tract.

Syracuse MSA AA

NBT is a leader in originating CD loans. During the evaluation period, NBT originated 12 CD loans totaling \$50.7 million in the AA. Six CD loans totaling \$38.9 million provided financing for 418 affordable housing units. Three CD loans totaling \$5.7 million supported economic development and three CD loans totaling \$6.0 million supported community development services for LMI individuals. CD lending was responsive to identified affordable housing needs and economic development needs in the AA.

Notable community development loans include:

- A \$18.8 million loan to help construct 66 affordable housing units for low-income seniors in Oswego County. Other funding sources for the housing development include Brownfield Tax Credits and a New York State Housing grant.
- A \$8.3 million loan to finance the renovation of 20 buildings containing 60 affordable housing units in Syracuse. Other funding sources for this project included federal and state Low Income Housing Tax credits, grants from New York State Homes and Community Renewal Housing Trust Fund, grants obtained from the New York Homeless Housing Assistance Program, and the Federal Home Loan Bank of New York.
- A \$4.8 million loan to construct and rehabilitate 53 units of affordable housing development in Syracuse. This \$16.6 million project involved funding from numerous federal and state sources including Federal Low-Income Housing Tax Credits, Home Funds, Local Initiative Support Corporation, and the New York State Empire Development.

Utica-Rome MSA AA

NBT originated a relatively high level of CD loans. During the evaluation period, NBT originated eight CD loans totaling \$27.3 million in the AA. Five CD loans totaling \$15.8 million supported economic development initiatives and three CD loans totaling \$11.5 supported revitalization or stabilization of low-income areas. CD loans were responsive to identified economic development needs in the AA.

Notable community development loans include:

- Two loans totaling \$7.2 million to reconstruct the Utica Harbor bulkheads. The redevelopment of the Utica Harbor is part of redevelopment plan to stimulate economic growth in the AA. Additional funding from for this project included a \$6 million grant from the Empire State's Upstate Revitalization Initiative and other local and private funding.
- A \$10 million loan provided financing to an AA business that provided job training and opportunities for individuals with significant disabilities. The business participated in a federal government program which helped the business to bid on federal contracting projects.
- A \$2.0 million loan to finance the demolition of two old water slides and construct two three new water slides in Utica. Additional funding for this project came from a \$500 thousand grant from the state of New York's Upstate Revitalization Initiative.

New York Statewide

NBT also made two affordable housing CD loans totaling \$19.7 million within the state of New York that did not have a specific purpose, mandate, or focus benefiting the AAs. One loan totaling \$8.7 million funded development of a 16 unit affordable senior housing project in a distressed middle-income census tract in Allegany County. One loan totaling \$11.0 million supported renovations to an affordable housing complex in Auburn, New York.

Product Innovation and Flexibility

The institution makes extensive use innovative and/or flexible lending practices in order to serve AA credit needs. NBT offers numerous loan products and programs with features that were responsive to credit needs of LMI individuals.

NBT participates in affordable mortgage loan programs through the State of New York Mortgage Authority (SONYMA). This loan product has flexible features which would be attractive to low- or moderate-income borrowers. These features include low down payment requirements, no PMI or guarantee fees, no minimum credit scores, and interest rates that are customarily below prevailing market rates. The program also offers low interest loans to cover down payment costs.

NBT participates in the Home in the City loan program which features low down payments of two percent and reduced interest rates. In addition, NBT offers a 97 percent LTV loan product that features down payments as low as 3 percent for first time homebuyers. This product is available in the following cities: Albany, Schenectady, Rensselaer, Troy, Norwich, Syracuse, Binghamton, Glens Falls, Plattsburg, Utica, Rome, Amsterdam, Gloversville, Cortland, Endicott, and Johnson City.

Albany-Schenectady-Troy MSA

NBT makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. NBT originated seven FHA loans totaling \$947 thousand, three loans through the Home in the City Program totaling \$494 thousand and two loans through the bank's CRA loan program totaling \$94 thousand. The bank also originated three loans through the USDA Rural Guaranteed program totaling \$210 thousand.

NY Non-MSA AA

NBT makes extensive use innovative and/or flexible lending practices in order to serve AA credit needs. NBT originated 49 FHA loans totaling \$6.0 million, 27 loans through the First Home Loan program totaling \$1.9 million, 15 loans through the Home in the City Program totaling \$1.3 million, 15 loans through the 97 percent LTV program totaling \$1.5 million, three VA loans totaling \$564 thousand, three loans through the bank's CRA loan program totaling \$143 thousand, and two loans through the SONYMA housing program totaling \$158 thousand. The bank also originated 22 loans through the USDA Rural Guaranteed program totaling \$2.2 million.

Syracuse MSA AA

NBT makes extensive use innovative and/or flexible lending practices in order to serve AA credit needs. NBT originated 37 FHA loans totaling \$4.5 million, 19 loans through the 97 percent LTV program totaling \$2.0 million, 17 loans through the First Home Loan program totaling \$1.5 million, six loans through the Home in the City Program totaling \$682 thousand, four loans through the SONYMA housing program totaling \$455 thousand, two loans through the bank's CRA loan program totaling \$155 thousand, and one VA loans totaling \$255 thousand. The bank also originated 12 loans through the USDA Rural Guaranteed program totaling \$1.5 million.

Utica-Rome MSA AA

NBT makes extensive use innovative and/or flexible lending practices in order to serve AA credit needs. NBT originated 24 FHA loans totaling \$2.7 million, 18 loans through the Home in the City Program totaling \$1.6 million, four loans through the SONYMA housing program totaling \$371 thousand, three loans through the bank's CRA loan program totaling \$78 thousand, three loans through the First Home Loan program totaling \$175 thousand, and one VA loans totaling \$229 thousand. The bank also originated eight loans through the USDA Rural Guaranteed program totaling \$898 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Binghamton MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area(s). The bank's performance under Lending Test in the Glens Falls MSA AA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. In the Glens Falls MSA AA, the bank's distribution of loans to borrowers of different income levels and businesses of different sizes was weaker than the bank's overall performance. Additionally, the bank makes limited use of community development loans in this AA.

Refer to Tables O through T in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based upon full scope reviews, the bank's performance in the Albany-Schenectady-Troy MSA AA, NY Non-MSA AA, the Syracuse MSA AA and the Utica-Rome MSA AA is good.

The institution has an excellent level of qualified investment and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albany-Schenectady-Troy MSA AA	8	278	59	13,164	67	15.40	13,442	12.44	0	0
NY Non-MSA AA	13	1,144	168	52,900	181	41.61	54,044	50.01	0	0
Syracuse MSA AA	3	3,480	73	16,293	76	17.47	19,773	18.30	0	0
Utica-Rome MSA AA	0	0	41	10,666	41	9.43	10,666	9.87	0	0
Binghamton MSA AA	2	245	54	6,939	56	12.87	7,184	6.65	0	0
Glens Falls MSA AA	0	0	14	2,952	14	3.22	2,952	2.73	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Albany-Schenectady-Troy MSA AA

NBT has an excellent level of qualified investments and grants, rarely in a leadership position, nor those routinely provided by private investors. The bank's qualified investments exhibit excellent responsiveness to community needs. NBT occasionally uses innovative and complex investments.

NBT made 59 investments totaling \$13.1 million during the evaluation period. The majority of these investments, \$13.0 million, consisted of municipal securities, the proceeds of which supported community services and revitalization projects in low- and moderate-income geographies.

The bank made 50 CD grants totaling \$85 thousand including \$62 thousand to community organizations serving economically disadvantaged individuals and \$18 thousand toward affordable housing initiatives.

NBT's investments were responsive to identified needs of affordable housing, food assistance, and programs to combat poverty. The municipal securities were responsive to identified economic needs. The level of municipal securities reflects a high level of leadership by NBT.

In addition, the bank had eight prior period investments consisting of municipal securities with a total remaining balance of \$278 thousand at the end of the evaluation period.

NY Non MSA AA

NBT has an excellent level of qualified investments and grants, rarely in a leadership position, nor those not routinely provided by private investors. The bank's qualified investments exhibit excellent responsiveness to community needs. NBT occasionally uses innovative and complex investments.

NBT made 168 investments totaling \$52.9 million during the evaluation period including \$50.4 million in municipal securities. Most of the municipal securities financed expenditures for facilities improvements and transportation in school districts which a majority of the students were eligible for free or reduced lunch. Of the total municipal securities, \$2.9 million of the securities provided financing for water and sewer improvements in the AA, including distressed middle-income census tracts in Hamilton County. The municipal securities were responsive to identified economic development needs in the AA. The level of municipal securities reflects a high level of leadership by NBT. To acquire these securities, the bank pledged additional securities.

NBT made 119 CD grants totaling \$494 thousand in the AA. These contributions included 16 contributions totaling \$50 thousand for affordable housing and 95 contributions totaling \$191 thousand to community organizations providing social needs of very low and low-income individuals. These contributions were responsive to identified affordable housing and basic needs of economically disadvantaged individuals.

In addition, NBT had 13 prior period investments consisting solely of municipal securities with a total remaining balance of \$1.1 million at the end of the evaluation period.

Syracuse MSA AA

NBT has an excellent level of qualified investments and grants, rarely in a leadership position, nor those not routinely provided by private investors. The bank's qualified investments exhibit excellent responsiveness to community needs. NBT occasionally uses of innovative and complex investments.

NBT made 73 investments totaling \$16.3 million during the evaluation period. Qualified investments consisted primarily of seven municipal securities totaling \$13.2 million with proceeds used to support community services and revitalization efforts in low- and moderate-income census tracts in the AA. Qualified investments included \$2.8 million in multi-family mortgage backed securities backed by three Section 8 multiple-family housing developments containing 408 affordable housing units in Syracuse.

NBT made 63 CD grants totaling \$291 thousand. These contributions included 55 contributions totaling \$265 thousand for community development services and six contributions totaling \$23 thousand for affordable housing efforts.

The bank's investments were responsive to identified affordable housing and the social service needs of very low and low-income individuals. The municipal securities were responsive to identified economic development needs. The level of municipal securities reflects a high level of leadership by NBT.

In addition, the bank had three prior period investments with a total remaining balance of \$3.5 million at the end of the evaluation period. These investments consisted of low-income housing tax credits, municipal securities, and an affordable housing bond.

Utica-Rome MSA AA

NBT has an excellent level of qualified investments and grants, rarely in a leadership position, nor those not routinely provided by private investors. The bank's qualified investments exhibit excellent responsiveness to community needs. NBT occasionally uses innovative and complex investments.

NBT made 41 investments totaling \$10.7 million during the evaluation period. The majority of the qualified investments consisted of municipal securities totaling \$10.6 million the proceeds of which were used to fund community service and revitalization projects benefiting low- and moderate-income census tracts. Of the total municipal securities, \$5.4 million supported AA economic growth through the Utica Harbor development project, which is part of the Upstate Revitalization Initiative.

Investments also include 32 CD contributions totaling \$92 thousand benefiting organizations providing community development services to primarily low- and moderate-income individuals and families.

The investments were responsive to identified economic development needs. The level of municipal securities reflects a high level of leadership by NBT. To acquire these securities, the bank pledged additional securities.

New York Statewide

The assessment of performance considered qualified investments that benefited the state of New York. The bank invested \$2.0 million in a small business development corporation which serves the entire state of New York including the bank's AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Binghamton MSA AA and Glens Falls MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area(s).

SERVICE TEST

The bank's performance under the Service Test in New York is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany-Schenectady-Troy MSA AA, New York Non-MSA AA the Syracuse MSA AA, and the Utica-Rome MSA AA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albany-Schenectady-Troy MSA AA	14.2	15	14.4	13.3	20.0	46.7	20.0	7.4	18.0	49.7	23.8
NY Non-MSA AA	53.6	51	49.0	0.0	5.9	82.4	11.8	1.4	9.9	71.0	15.1
Syracuse MSA AA	13.6	19	18.3	5.3	21.1	42.1	31.6	9.3	16.7	45.4	27.2
Utica-Rome MSA AA	10.2	9	8.7	22.2	0.0	55.6	22.2	11.7	10.2	53.0	23.3
Binghamton MSA AA	7.0	8	7.7	25.0	12.5	62.5	0.0	6.4	12.7	55.0	25.8
Glens Falls MSA AA	1.5	2	1.9	0.0	0.0	100.0	0.0	0.0	7.0	82.6	10.4

*Does not equal 100.0 percent due to Census Tracts which do not have income information.

Note: Deposit and Branch percentages may not equal 100.0 percent due to rounding.

Albany-Schenectady-Troy MSA AA

The institution's delivery systems are readily accessible to geographies and individuals of different income levels. NBT operated 15 branches in the AA including two branches in low-income census tracts and three branches in moderate-income census tracts, proportionate to population distribution. All branches, with one exception, had deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks.

NY Non-MSA AA

The institution's delivery systems are accessible to geographies and individuals of different income levels. NBT operated 51 branches in the AA including three branches in moderate-income census tracts. NBT did not operate any branches in low-income census tracts; however, there were only four low-income census tracts in the AA. Branch distribution in the moderate-income census tracts was below the population distribution.

The assessment of performance considered the close-proximity of branches in middle- or upper-income census tracts to low- or moderate-income census tracts, the accessibility of stand-alone deposit taking ATMs and branches in distressed and/or underserved middle-income census tracts. NBT operated one branch in a middle-income census tract within close-proximity of low-income census tracts and six branches in middle- or upper-income census tracts within close-proximity to moderate-income census tracts. The branch, near to a low-income census tract, relates to the October 2017 relocation of the Plattsburgh, NY Margaret Street branch in a low-income census tract to its new location 0.3 miles away but in a middle-income census tract. Most of the ATMs at the branches and stand-alone ATMs were deposit-taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks. Two of the three branches in moderate-income census tracts had deposit-taking ATMs enhanced with deposit automation. NBT also operated a stand-alone, deposit taking ATM in a low-income census tract enhanced with deposit automation.

Four NBT branches are in distressed and/or underserved middle-income census tracts. One branch in Hamilton County was in a distressed middle-income census tract during the evaluation period. Three NBT branch offices in St. Lawrence County were in distressed middle-income census tracts during 2018 and 2019. One NBT branch in an upper-income census tract in St. Lawrence County was in close-proximity of a distressed middle-income census tract.

Syracuse MSA AA

The institution's delivery systems are readily accessible to geographies and individuals of different income levels. NBT operated 19 branches in the AA including one branch in a low-income census tract and four branches in moderate-income census tracts. Branch distribution in low-income census tracts was below the population distribution. Branch distribution in the moderate-income census tracts exceeded the population distribution.

The assessment of performance considered the close-proximity of branches in middle- or upper-income tracts to low- or moderate-income tracts and the accessibility of stand-alone deposit taking ATMs. NBT operated one branch in a middle-income census tract within close-proximity of low-income census tracts and five branches in middle- or upper-income census tracts within close proximity to moderate-income census tracts. All branches were equipped with ATMs and most were equipped with deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks. The branch in the low-income census tract and three of four branches in moderate-income census tracts had deposit taking ATMs equipped with deposit automation. NBT also operated a stand-alone, deposit taking ATM in a low-income census tract enhanced with deposit automation.

Utica-Rome MSA AA

The institution's delivery systems are accessible to geographies and individuals of different income levels. NBT operated nine branches in the AA including two branches in low-income census tracts. The bank operated no branches in moderate-income census tracts.

The assessment of performance considered the close-proximity of branches in middle- or upper-income tracts to low- or moderate-income tracts and the accessibility of stand-alone deposit taking ATMs. NBT operated four branches in middle- or upper-income census tracts within close-proximity to moderate-income census tracts. All, but one of the branches, were equipped with deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks. Both

branches in the low-income census tracts were equipped with deposit automation. NBT also operated a stand-alone, cash dispensing ATM in a moderate-income census tract.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albany-Schenectady-Troy MSA AA	0	0				
NY Non-MSA AA	1	4	-1			-2
Syracuse MSA AA	1	1				
Utica-Rome MSA AA	0	0				
Binghamton MSA AA	0	1			-1	
Glens Falls MSA AA	0	0				

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. As noted above, in October 2017, NBT relocated the Plattsburgh, NY Margaret Street branch in a low-income census tract of the NY Non-MSA AA to its new location 0.3 miles away in a middle-income census tract. To lessen the impact on the low-income census tract, the bank installed a deposit taking ATM in that same low-income census tract. NBT closed one branch in a distressed middle-income census tract in St. Lawrence County in the NY Non MSA AA. Customer accounts were transferred to another branch in another middle-income distressed census tract located approximately eight miles from the former branch. NBT closed one branch in a middle-income census tract in the Binghamton MSA AA and two branches in upper-income census tracts in the NY Non MSA AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. Management sets branch hours based upon customer needs and traffic patterns in each AA.

Albany-Schenectady-Troy MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, including Saturday hours.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 30 customers from low-income census tracts and 353 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics

on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 336 Classic Checking customers from low-income census tracts in the AA and 5,291 Classic Checking customers from moderate-income census tracts in the AA.

NY Non-MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, including Saturday hours.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 49 customers from low-income census tracts and 555 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 579 Classic Checking customers from low-income census tracts in the AA and 7,900 Classic Checking customers from moderate-income census tracts in the AA.

NBT offered a financial literacy program to customers' employees through the NBT@Work program. The program includes on-site education workshops, one-on-one financial coaching, planning tools and savings strategies. One of the five businesses from the AA participating in the NBT@Work program was in a low-income census tract.

Syracuse MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, including Saturday hours.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 69 customers from low-income census tracts and 296 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 659 Classic Checking

customers from low-income census tracts in the AA and 5,471 Classic Checking customers from moderate-income census tracts in the AA.

Utica-Rome MSA AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank offers traditional deposit, credit, and banking products at all branch locations in the AA. Most branches have extended hours on various days, including Saturday hours.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 70 customers from low-income census tracts and 76 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 1,052 Classic Checking customers from low-income census tracts in the AA and 1,446 Classic Checking customers from moderate-income census tracts in the AA.

NBT offered a financial literacy program to customers' employees through the NBT@Work program. The program includes on-site education workshops, one-on-one financial coaching, planning tools and savings strategies. One of the two businesses from the AA participating in the NBT@Work program was in a low-income census tract.

Community Development Services

The institution provides a high level of CD services.

Albany-Schenectady-Troy MSA AA

NBT provides a high level of CD services. During the evaluation period, 16 employees contributed 1,490 hours to 21 community development organizations primarily in board and leadership positions. Bank personnel provided services to 14 organizations that serve LMI individuals, six economic development organizations and three affordable housing organizations.

Examples of services:

- One employee served on the board of a local nonprofit organization that administered a loan pool benefiting nonprofit organizations and small businesses.
- One employee served on the board of an organization that provided health care services to low-income individuals.
- One employee served on the board of local organization that provided social services to homeless individuals.

NY Non-MSA AA

NBT provides a high level of community development services. During the evaluation period, 33 employees contributed 3,340 hours to 58 community development organizations primarily in board and leadership positions. Bank personnel provided financial expertise to 41 organizations that serve LMI individuals, six economic development organizations and four affordable housing organizations. NBT employees conducted 15 sessions of financial literacy training for schools with more than 50 percent of the students eligible for free or reduced lunch.

Examples of services:

- One employee served as a board member of community organization that provided social services, affordable housing, and financial literacy education for LMI individuals.
- One employee served as a board member of an organization that provided food assistance, home rehabilitation, and social services to low-income individuals.
- One employee served as a board member of a non-profit organization that supported affordable housing and community revitalization efforts.
- One employee served on the board of a local organization that administered a lending program assist existing and startup businesses.

Syracuse MSA AA

NBT provides an adequate level of community development services. During the evaluation period, 10 employees contributed 583 hours to 15 organizations primarily in board and leadership positions. Bank personnel provided financial and banking expertise to six affordable housing organizations, three community service organizations, and three economic development organizations.

Examples of services:

- One employee conducted 17 homebuyer seminars in cooperation with three affordable housing organizations.
- One employee served as a board member and loan committee member of a local affordable housing organization.
- One employee was a board member of a business development corporation that provides non-conventional long-term financing to small businesses.
- One employee served on the board of an economic development corporation that extends funds to commercial businesses in the city of Syracuse.

Utica-Rome MSA AA

NBT provides a high level of community development services. During the evaluation period, nine employees contributed 720 hours to seven community development organizations primarily in board and leadership positions. Bank personnel provided financial and banking expertise to six affordable housing organizations, five community service organizations, and two economic development organizations.

Examples of services:

- One employee conducted 17 home buyer seminars for a local affordable housing organization.
- One employee served as a board member of an organization that provided financing to local businesses to create employment and foster business development.
- One employee served as the president of a local community center that operated a children's day care facility for lower income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton MSA AA was stronger and was weaker in the Glens Falls MSA AA than the bank's overall performance under the Service Test in the full-scope areas due to better branch distribution in the Binghamton MSA AA and weaker branch distribution in the Glens Falls MSA AA.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the AAs credit needs.
- The bank exhibits an adequate geographic distribution of home mortgage loans and small loans to businesses.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has an adequate level of CD loans.
- The bank has a good level of qualified investments.
- Delivery systems are accessible to census tracts and individuals of different income levels in the AAs.
- The bank provides a high level of community development services to its AAs.

Description of Institution's Operations in Pennsylvania

NBT had four assessment areas in the state of Pennsylvania consisting of the East Stroudsburg MSA AA (MSA #20700), Newark NJ-PA MD AA (Newark MD AA) (MD #35084), Scranton-Wilkes-Barre MSA AA (MSA #42540) and non-metropolitan counties in Pennsylvania (PA Non-MSA AA). The Newark MD is part of the larger New York-Newark-Jersey City, NY-NJ-PA MSA (MSA #35620). The four contiguous AAs were in northeastern Pennsylvania and bordered the state of New York to the north. The East Stroudsburg MSA AA consisted of the sole county in the MSA, Monroe County. The Newark MD AA consisted of the sole county in the state of Pennsylvania in the MSA, Pike County. The Scranton-Wilkes Barre MSA consisted of all three counties in the MSA – Lackawanna, Luzerne and Wyoming Counties. The PA Non-MSA AA consisted of Susquehanna and Wayne Counties. NBT operated 30 branches, all with ATMs, and seven standalone ATMs in the state of Pennsylvania during most of the evaluation period. The bank closed a branch in the East Stroudsburg MSA AA on December 13, 2019 and a branch in the Scranton-Wilkes-Barre MSA AA on December 20, 2019, respectively resulting in 28 branches by year-end 2019 representing 19.2 percent of the bank's total branch network.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities include commercial banking, retail banking and wealth management services. Home mortgage loans was NBT's primary product in Pennsylvania during the evaluation period accounting for 72.5 percent of loans made in Pennsylvania. The bank faced strong competition for deposits and loans in the state.

NBT reported \$993.6 million in deposits, or 13.00 percent of the bank's total deposits, in the state of Pennsylvania based on deposit information as of June 30, 2019. NBT ranked sixth out of 55 depository institutions with 5.11 percent market share based on the deposit market share reports for June 30, 2019. The top banks, in terms of deposit market share in the combined AAs, in the state of Pennsylvania included PNC Bank N. A. with 19.22 percent, Wells Fargo Bank N. A. with 8.35 percent, Peoples Security Bank and Trust Company with 8.15 percent, CBNA. with 5.40 percent, and M&T Bank with 5.21 percent.

NBT originated and purchased 16.31 percent of its total home mortgage loans and 9.72 percent of its total small business loans in the state of Pennsylvania AAs during the evaluation period.

PA Non-MSA AA

NBT operated eight branches, all with deposit taking ATMs, and two stand-alone, cash dispensing ATMs in the PA Non-MSA AA. The branches were in middle- and upper-income census tracts in Susquehanna and Wayne Counties. The eight branches accounted for 5.48 percent of NBT bank-wide branch network and 28.57 percent of the branches in Pennsylvania as of December 31, 2019.

The bank faced moderate competition for deposits and loans in the AA. NBT reported \$315.0 million in deposits in the PA Non-MSA AA which represented 4.12 percent of the bank's total deposits and 31.70 percent of the bank's total deposits in the state. NBT ranked fourth out of 11 depository institutions in the AA with 13.96 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included Peoples Security Bank and Trust Company with 20.56 percent, The Honesdale National Bank with 18.68 percent, and The Dime Bank with 18.57 percent, NBT and Wayne Bank with 13.26 percent.

NBT originated and purchased 4.21 percent of its total home mortgage loans in the AA and 25.83 percent of home mortgage loans in the state in the PA Non-MSA AA during the evaluation period. NBT originated and purchased 2.20 percent of its total small business loans in the AA and 22.62 percent of small business loans in the state in the PA Non-MSA AA during the evaluation period.

Economic Data

Based on data from the Pennsylvania Department of Labor and Federal Housing Finance Agency, the economy of the PA non-MSA AA was at risk of recession. Since 2017, wage growth slowed and housing prices fluctuated, but grown slightly. The region was primarily rural, and dairy farming, which was once a major industry in the area, has declined due to decreased demand. Many rural families in the area also earned income from gas leases on land used by energy companies for hydraulic fracking of natural gas below the land. Key sectors of the PA non-MSA AA's economy, based on percentage of total employment, included education and health services, government services and retail trade. The PA Non-MSA AA had a reasonable cost of housing that makes homeownership for moderate-income individuals and families affordable but could impede homeownership for those of low-income.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Susquehanna County was 5.0 percent and Wayne County was 5.8 percent which was above the state unemployment rate of 4.6 percent. Major employers in the AA included Gas Drilling Services Co, Wayne Memorial Health System, the state and federal government, and local school districts.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact conducted during the evaluation period within the PA Non-MSA AA to determine local economic conditions and community needs. The community contact, from an economic development corporation, noted a need for start-up capital funding for local small businesses.

Table A – Demographic Information of the Assessment Area						
Assessment Area: PA Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	0.0	12.0	80.0	8.0	0.0
Population by Geography	94,011	0.0	10.8	80.6	8.6	0.0
Housing Units by Geography	54,844	0.0	9.4	82.1	8.5	0.0
Owner-Occupied Units by Geography	28,902	0.0	8.7	81.7	9.5	0.0
Occupied Rental Units by Geography	7,891	0.0	21.3	69.4	9.2	0.0
Vacant Units by Geography	18,051	0.0	5.3	88.2	6.5	0.0
Businesses by Geography	6,423	0.0	14.8	74.3	10.8	0.0
Farms by Geography	430	0.0	3.7	82.8	13.5	0.0
Family Distribution by Income Level	25,112	16.5	17.4	22.6	43.4	0.0
Household Distribution by Income Level	36,793	20.5	15.1	18.2	46.1	0.0
2019 Median Family Income Non-MSAs — PA		\$63,200	Median Housing Value			\$167,903
			Median Gross Rent			\$776
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scranton-Wilkes-Barre MSA AA

NBT operated 15 branches, all with deposit-taking ATMs, and five stand-alone, mainly deposit-taking ATMs in the Scranton-Wilkes-Barre MSA AA. The branches were mainly in middle- and upper-income census tracts in Lackawanna and Luzerne Counties with two branches in moderate-income census tracts in Lackawanna County and one branch in a low-income census tract in Luzerne County. The 15 branches accounted for 10.27 percent of NBT bank-wide branch network and 53.57 percent of the branches in Pennsylvania as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$523.4 million in deposits in the Scranton-Wilkes-Barre MSA AA which represents 6.85 percent of the bank's total deposits and 52.67 percent of the deposits in the state of Pennsylvania. NBT ranked 10th out of 51 depository institutions in the AA with 3.84 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included PNC Bank N. A. with 22.39 percent, Peoples Security Bank and Trust Company with 7.83 percent, Wells Fargo Bank, N. A. with 7.78 percent, CBNA with 7.27 percent, and M&T Bank with 7.18 percent.

NBT originated and purchased 9.31 percent of its total home mortgage loans in the AA and 57.09 percent of home mortgage loans in the state in the Scranton-Wilkes-Barre MSA AA during the evaluation period. NBT originated and purchased 5.55 percent of its total small business loans in the AA and 57.08 percent of small business loans in the state in the Scranton-Wilkes-Barre MSA AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics data, the economy of the Scranton-Wilkes-Barre MSA was at risk of recession. Employment metrics since Spring 2019 showed a decline in private and public sector employment and modest wage growth. Previously anticipated logistical business growth in the AA had not materialized despite the AA's beneficial location and increased in e-commerce activity. The AA had four interstate highways that put it within a day's drive to almost half of the U.S. population, but weaker freight and warehousing demand than anticipated impeded growth. The AA also had an aging population and faced a declining level of post-secondary educated adults, which impeded the growth of the professional health care industry. Residents older than 65 years represented 18.5 percent of the population, and graduates with bachelor's degrees increasingly left the AA for opportunities in the New York City and Philadelphia metropolitan areas. The Scranton-Wilkes-Barre MSA AA had a reasonable cost of housing that made homeownership for LMI individuals and families affordable. Key sectors of the Scranton-Wilkes-Barre MSA AA's economy, based on percentage of total employment, include education and health services, government services, and retail trade.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Lackawanna County was 5.0 percent, Luzerne County was 6.0 percent and Wyoming County was 5.4 percent which was above the state unemployment rate of 4.6 percent. Major employers in the AA included Tobyhanna Army Depot, Geisinger Health, Wyoming Valley Health Care, Berwick Offray LLC, and Procter & Gamble.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from three community contacts conducted during the evaluation period within the Scranton-Wilkes-Barre MSA AA to determine local economic conditions and community needs. The community contacts noted the need for government-backed small business loans and programs to assist with affordable homeownership.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Scranton-Wilkes-Barre MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	170	3.5	24.7	51.2	19.4	1.2
Population by Geography	561,701	3.2	20.5	52.2	23.6	0.5
Housing Units by Geography	258,782	3.1	20.3	54.5	21.8	0.4
Owner-Occupied Units by Geography	152,184	1.6	14.2	56.5	27.5	0.0
Occupied Rental Units by Geography	72,436	6.0	31.3	48.8	12.9	1.0
Vacant Units by Geography	34,162	3.0	24.1	57.4	14.9	0.6
Businesses by Geography	39,306	2.6	18.8	51.7	24.7	2.1
Farms by Geography	893	1.2	9.7	55.0	33.9	0.1
Family Distribution by Income Level	141,530	21.3	17.6	20.5	40.6	0.0
Household Distribution by Income Level	224,620	25.1	15.9	16.9	42.2	0.0
2019 Median Family Income MSA — 42540 Scranton—Wilkes-Barre, PA MSA		\$67,000	Median Housing Value			\$130,472
			Median Gross Rent			\$710
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Pennsylvania

The OCC conducted full-scope reviews of the PA Non-MSA AA and the Scranton-Wilkes-Barre MSA AA and limited-scope reviews of the East Stroudsburg MSA AA and Newark MD AA. The two full-scope assessment areas accounted for 84.4 percent of deposits, 81.8 percent of loans and 82.1 percent of branches in the state of Pennsylvania. The Scranton-Wilkes-Barre MSA AA received the highest weighting of the four AAs as it accounted for 52.7 percent of deposits, 57.0 percent of lending and 53.6 percent of the branches in the state. Home mortgage loans, which accounted for 72.5 percent of loans made in the state's AAs during the evaluation period, were given more weight than small business loans. NBT originated and purchased nine small farm loans in all AAs during the evaluation period. The volume was not significant; therefore, an analysis would not be meaningful. The geographic distribution analysis for the PA Non-MSA AA was weighted less than the borrower income distribution analysis given the lack of low-income census-tracts in the AA.

As mentioned previously, the Newark MD was part of the larger New York-Newark-Jersey City, NY-NJ-PA MSA (MSA #35620). The MSA included five other MD's which the bank did not include in the AA. Therefore, the analysis of the activity in this MSA focused on the activity in the Newark MD.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in Pennsylvania is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the PA non-MSA AA and the Scranton-Wilkes-Barre MSA AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
East Stroudsburg MSA AA	76	57	0	0	136	7.6	7.9
Newark MD AA	141	39	5	0	180	10.6	7.7
PA Non-MSA AA	328	107	0	0	435	24.8	31.7
Scranton-Wilkes-Barre MSA AA	725	270	4	5	1,004	57.0	52.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
East Stroudsburg MSA AA	7,100	3,897	0	0	10,997	6.0	7.9
Newark MD AA	19,570	3,261	500	0	23,331	12.7	7.7
PA Non-MSA AA	32,986	7,720	0	0	40,706	22.1	31.7
Scranton-Wilkes-Barre MSA AA	72,785	36,029	94	14,605	123,513	59.2	52.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

PA Non-MSA AA

Lending levels reflect excellent responsiveness to AA credit needs. According to 2019 peer deposit market share data, NBT reported \$315.0 million in deposits in the PA Non-MSA AA. As of June 30, 2019, the bank ranked fourth out of 11 depository institutions in the AA, or the 64th percentile, with 13.96 percent market share in the AA.

Based on 2019 HMDA market share data, NBT ranked fifth out of 231 lending institutions for home mortgage loan originations and purchases, or the 98th percentile, with a 5.28 percent market share demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, The Honesdale National Bank, Summit Mortgage Corporation, The Dime Bank, Quicken Loans, and NBT, had a combined market share of 44.33 percent. Market share for the top five lenders ranged from 5.28 percent to 8.49 percent.

Based on 2018 CRA small business loan data, the bank ranked 13th out of 65 small business lenders, or the 80th percentile, with a 1.81 percent market share demonstrating good responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Chase Bank USA N. A., Citibank N. A., Capital One Bank (USA) N. A., and US Bank N. A., had a combined market share of 41.66 percent. Market share for the top five lenders ranged from 6.25 percent to 19.33 percent. All five lenders had average loan sizes ranging from \$5 thousand to \$11 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Scranton-Wilkes-Barre MSA AA

Lending levels reflect good responsiveness to AA credit needs. According to 2019 peer deposit market share data, NBT reported \$523.4 million in deposits in the Scranton-Wilkes-Barre AA. As of June 30, 2019, the bank ranked 10th out of 51 depository institutions in the AA, or the 80th percentile, with 3.84 percent market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 18th out of 350 lending institutions for home mortgage loan originations and purchases, or the 95th percentile, with a 1.96 percent market share demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, Wells Fargo Bank, N. A., Quicken Loans, PNC Bank N. A., The Fidelity Deposit and Discount Bank, and CBNA, had a combined market share of 22.45 percent. Market share for the top five lenders ranged from 3.84 percent to 5.04 percent.

Based on 2018 CRA small business loan data, the bank ranked 24th out of 98 small business lenders, or the 76th percentile, with a 0.80 percent market share demonstrating adequate responsiveness to credit needs. The top five lenders in the market, American Express National Bank, PNC Bank N. A., Chase Bank USA N. A., Synchrony Bank, and US Bank N. A., had a combined market share of 46.15 percent. Market share for the top five lenders ranged from 6.39 percent to 16.14 percent. Four of the five lenders had average loan sizes ranging from \$3 thousand to \$12 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA(s). The PA Non-MSA AA did not include any low-income census tracts. Therefore, the geographic distribution in the PA Non-MSA AA relied upon distribution of loans in moderate-income census tracts.

Home Mortgage Loans

Refer to Table O in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is adequate.

PA Non-MSA AA

The geographic distribution of home mortgage loans in the PA Non-MSA AA is good. The geographic distribution in moderate-income census tracts exceeded both the percentage of owner-occupied housing and aggregate lending in the AA. The assessment of performance also considered the home mortgage lending in underserved middle-income census tracts in Susquehanna County. The bank originated 165 or \$17.4 million in home mortgage loans to borrowers in underserved middle-income census tracts of the AA which equated to 50.30 percent of the number and 52.79 percent of the amount of loans originated and purchased in the AA..

Scranton-Wilkes Barre AA

The geographic distribution of home mortgage loans in the Scranton-Wilkes Barre MSA AA is adequate. The geographic distribution of home mortgage loans in low-income census tracts was below both the percentage of owner-occupied housing and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts was below both the percentage of owner-occupied housing and well below aggregate lending in the AA..

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is poor.

PA Non-MSA AA

The geographic distribution of small loans to businesses is poor. The geographic distribution of small loans to businesses in moderate-income census tracts was significantly below both the percentage of businesses and aggregate lending in the moderate-income census tracts. The assessment of performance considered the bank's lending in underserved middle-income census tracts. During the evaluation period, the bank also originated 63 or \$4.66 million in small loans to businesses in underserved middle-income census tracts which equated to 58.88 percent of the number and 60.38 percent of the amount of loans originated and purchased in the AA.

Scranton-Wilkes-Barre MSA AA

The geographic distribution of small loans to businesses is poor. The geographic distribution of small loans to businesses in low-income census tracts was near both the percentage of businesses operating in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts was significantly below both the percentage of businesses operating in moderate-income census tracts and aggregate lending in the moderate-income census tracts.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good.

PA Non-MSA AA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but significantly exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near the percentage of moderate-income families and but exceeded aggregate lending in the AA.

Scranton-Wilkes Barre MSA AA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and exceeded aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses of different sizes is good.

PA Non-MSA AA

The distribution of small loans to businesses of different sizes is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage those businesses but significantly exceeded aggregate lending in the AA.

Scranton-Wilkes Barre MSA AA

The distribution of small loans to businesses of different sizes is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage those businesses but significantly exceeded aggregate lending in the AA.

The assessment of performance considered the lending market share to businesses with gross annual revenues of \$1 million or less and significant competition from credit card companies, large banks and multi-national banks. In 2018, the bank ranked 17th out of 98 lenders with 1.22 percent market share for lenders making small loans to businesses with revenues of \$1 million or less than which significantly exceeded its overall small business lending market share of 0.80 percent and ranking of 24th out of 98 lenders. Collectively, American Express National Bank, PNC Bank N. A., Citibank NA, US Bank N. A., and Wells Fargo Bank N. A. had a combined market share of 55.96 percent. Three of the five institutions had an average loan size between \$6 thousand and \$7 thousand for loans to small-sized businesses which is indicative of credit card lending. While NBT does not originate credit cards, it referred customers to a third-party credit card originator.

Community Development Lending

The institution has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

PA Non-MSA AA

The bank made no CD loans in the PA Non-MSA AA during the evaluation period.

Scranton-Wilkes-Barre MSA AA

NBT had a relatively high level of CD loans in the AA. During the evaluation period, NBT made four loans totaling \$14.1 million to two organizations for economic development of a low- and moderate-income area that provided jobs to low- and moderate-income individuals and one loan for \$500 thousand to an organization operating a low-income senior apartment complex.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank offers several innovative and flexible lending products for residential and commercial borrowers, primarily through federal and state government sponsored agencies. The bank participates with the Pennsylvania Housing Finance Agency (PHFA), FHFA First Home Loan program, FHA,

USDA, and SBA, and has its own lending practices that offer affordable lending products to low- and moderate-income borrowers and small businesses. These practices had a positive impact on the bank's overall Lending Test rating for the state of Pennsylvania.

PA Non-MSA AA

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, the bank originated six loans for \$627 thousand under the FHFA First Home Loan program, three loans for \$359 thousand under the FHA program, three loans for \$126 thousand under the bank's CRA loan program, two loans for \$132 thousand under the PHFA program, one loan for \$93 thousand under the Home in the City LMI Loan program, and one loan for \$240 thousand under the VA program. The bank also originated six loans for \$560 thousand under the USDA Rural program and one loan for \$40 thousand under the SBA program.

Scranton-Wilkes-Barre MSA AA

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, the bank originated 25 loans for \$2.1 million under the FHFA First Home Loan program, 17 loans for \$1.9 million under the FHA program, 12 loans for \$1.2 million under the PHFA program, 12 loans for \$1.1 million under the 97 percent LMI program, seven loans for \$489 thousand under the Home in the City LMI Loan program, and seven loans for \$401 thousand under the bank's CRA loan program. The bank also originated one loan for \$94 thousand under the USDA Rural program and one loan for \$130 thousand under the SBA program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the East Stroudsburg MSA AA is consistent with the bank's overall performance under the Lending Test in the full-scope area(s). The bank's performance under the lending test in the Newark MD AA is stronger than the bank's overall performance under the Lending Test in the full-scope AAs due to stronger geographic and borrower-income distribution of loans. The bank originated and purchased 10.6 percent of its loans in the state of Pennsylvania in the Newark MD AA during the evaluation period. The stronger performance did not significantly impact the overall Lending Test conclusion in Pennsylvania given the limited presence in the AA.

Refer to Tables O through R in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the PA Non-MSA and Scranton-Wilkes-Barre MSA AAs is good.

The institution has a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
PA Non-MSA AA	0	0	31	2,277	31	29.25	2,277	24.81	0	0
Scranton-Wilkes-Barre MSA AA	0	0	66	4,423	66	62.26	4,423	48.19	0	0
East Stroudsburg MSA AA	1	1,000	4	570	5	4.72	1,570	17.11	0	0
Newark MD AA	0	0	4	908	4	3.77	908	9.89	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments in the full-scope AAs include:

- One FNMA and FHLMC pool housing finance reinvestment bond, of which \$1.2 million was allocated to the PA Non-MSA AA and \$2.1 million was allocated to the Scranton-Wilkes-Barre MSA AA.
- One SBA loan fund of which \$930 thousand was allocated to the PA Non-MSA AA and \$1.6 million was allocated to the Scranton-Wilkes-Barre MSA AA.
- Fifteen grants totaling \$111 thousand to provide a variety of community service programs for LMI individuals and geographies in the PA Non-MSA and Scranton-Wilkes-Barre MSA AAs.

PA Non-MSA AA

The bank had a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community economic development needs. During the evaluation period, NBT made 31 qualified investments, donations, and grants to 18 organizations totaling \$2.3 million in the PA Non-MSA AA. The allocated portions of the affordable housing bond and SBA investment noted above total \$2.1 million and represent a substantial majority of the investment in this AA. Investments, donations and grants supported CD needs, primarily for affordable housing, community services for LMI individuals and economic development activities.

Scranton-Wilkes-Barre MSA AA

The bank had a significant level of qualified CD investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The bank exhibited adequate responsiveness to credit and community economic development needs. During the evaluation period, NBT made 66 qualified investments, donations, and grants to 28 organizations totaling \$4.4 million in the Scranton-Wilkes Barre MSA AA. The allocated portions of the affordable housing bond and SBA investment noted above total \$3.7 million. These investments along with a \$397 thousand MBS fully allocated to the Scranton-Wilkes-Barre AA represent a substantial majority of the investment in this AA.

The bank's qualified investments demonstrate adequate responsiveness to community needs in relation to the bank's size and performance and available community development opportunities in the AA. Investments, donations and grants supported CD needs, primarily for affordable housing, community services for LMI individuals, and economic development activities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the East Stroudsburg and Newark MD AAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the PA Non-MSA and Scranton-Wilkes-Barre AA(s) is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
PA Non-MSA AA	31.7	8	28.6	N/A	0.0	87.5	22.5	N/A	10.8	80.6	8.6
Scranton-Wilkes-Barre MSA AA	52.7	15	53.6	6.7	13.3	46.7	33.3	3.2	20.5	52.2	23.6
East Stroudsburg MSA AA	7.9	3	10.7	N/A	0.0	100	0	N/A	11.2	83.4	5.3
Newark MD AA	7.7	2	7.1	N/A	0.0	100	N/A	N/A	53.2	46.8	N/A

PA Non-MSA AA

The institution's delivery systems are accessible to geographies and individuals of different income levels. NBT operated eight branches in the AA. NBT did not operate any branches in moderate-income census tracts, and the AA did not have any low-income census tracts.

The assessment of performance considered the close-proximity of branches in middle- or upper-income census tracts to low- or moderate-income census tracts, the accessibility of ATMs and branches in distressed and/or underserved middle-income census tracts. NBT operated one branch in a middle-income census tract within close proximity of a moderate-income census tract. NBT operated a stand-alone, cash-dispensing ATM in a moderate-income census tract. NBT operated four branches in underserved middle-income geographies in Susquehanna County. In addition, one of the branches located in the underserved middle-income census tract was within close-proximity of a moderate-income census tract, providing benefit to LMI individuals near-to the branch.

Scranton-Wilkes-Barre MSA AA

The institution's delivery systems are accessible to geographies and individuals of different income levels. NBT operated 15 branches in the AA including one branch in a low-income census tract and two branches in moderate-income census tracts. Branches in low- and moderate-income census tracts were reasonably proportionate to the population distribution.

The assessment of performance considered the close-proximity of branches in middle- or upper-income census tracts to low- or moderate-income census tracts. NBT operated one branch in a middle-income census tract within close proximity of a moderate-income census tract.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
PA Non-MSA AA	0	0	0	0	0	0
Scranton-Wilkes-Barre MSA AA	0	2	0	0	-2	0
East Stroudsburg MSA AA	0	1	0	-1	0	0
Newark MD AA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed two branches in middle-income census tracts in the Scranton-Wilkes-Barre MSA AA, which did not adversely affect the accessibility of delivery systems of low- and moderate-income geographies and individuals in the area. The bank did not open any branches in low- and moderate-income geographies during the evaluation period.

PA Non-MSA AA

Services, including where appropriate, business hours do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank maintains standard business hours Monday through Saturday, has 24-hour onsite ATMs, and offers most traditional banking services throughout its branches. Branches are typically open from 9:00 a.m. to 4:00 p.m. with extended hours on Friday and limited hours on Saturday. Most branches were equipped with deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 20 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 759 Classic Checking customers from moderate-income census tracts in the AA.

Scranton-Wilkes Barre MSA AA

Services, including where appropriate, business hours do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank maintains standard business hours Monday through Saturday, has 24-hour onsite ATMs, and offers most traditional banking services throughout its branches. Branches are typically open from 8:30 a.m. to 5:00 p.m. with extended hours on Friday and limited hours on Saturday. Most branches were equipped with deposit taking ATMs enhanced with deposit automation which provided faster access to funds and images of deposited checks. One of the branches located in a moderate-income census tract in the Scranton-Wilkes-Barre MSA AA does not offer safe deposit boxes and does not have a drive-up teller window as it is located in a mall but offers multiple 24-hour onsite ATMs.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported 31 customers from low-income census tracts and 163 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 378 customers from low-income census tracts and 3,646 Classic Checking customers from moderate-income census tracts in the AA.

Community Development Services

The institution provides a high level of CD services.

PA Non-MSA AA

NBT provided a high level of CD services in the PA Non-MSA AA. During the evaluation period, four bank employees provided 193 service hours to eight different non-profit organizations. CD service activities were primarily provided for economic development purposes. The bank's employees engaged in community development activities that were responsive to community needs of the AA.

Scranton-Wilkes-Barre MSA AA

NBT is a leader in providing CD services in the Scranton-Wilkes-Barre MSA AA. During the evaluation period, 10 bank employees provided 1,205 service hours to 15 different non-profit organizations. CD service activities were primarily provided for economic development purposes. The bank's employees engaged in community development activities that were responsive to community needs.

Examples of qualified CD services in the AA(s) include the following:

- One bank employee serves as a Board member for a local non-profit organization that promotes small business initiatives and provides free services and events to the community. This employee performed 725 hours of service for this organization during the evaluation period.
- One bank employee serves in a leadership role for a local non-profit housing authority that provides affordable housing to LMI individuals. This employee performed 167 hours of service for this organization during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the East Stroudsburg MSA and Newark MD AAs are weaker than the bank's overall performance under the Service Test in the full-scope area(s) which impacted the overall rating. In both the East Stroudsburg MSA AA and the Newark MD AA, the accessibility of service delivery systems to geographies and individuals of different income levels in the institution's AA and the level of community development services were weaker than the performance in the full scope AAs.

State Rating

State of Vermont

CRA rating for the State of Vermont: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs
- The geographic distribution of loans is good.
- The distribution of home mortgage loans to individuals of different incomes and small loans to businesses of different sizes is adequate.
- The bank made a relatively high level of CD loans.
- The bank originated a significant level of qualified investments.
- The bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank provides an adequate level of CD services.

Description of Institution's Operations in Vermont

NBT had two assessment areas in the state of Vermont consisting of the Burlington-South Burlington MSA AA (MSA #15540) and non-metropolitan counties in Vermont (VT Non-MSA AA). The Burlington-South Burlington MSA AA consisted of three counties representing the MSA, namely Chittenden, Franklin and Grand Isle Counties. The VT Non-MSA AA consisted of one county – Rutland County. The two AAs were in western Vermont and bordered New York to the west. The Vermont AAs were not contiguous to the other but were contiguous to AAs in the state of New York. The two AAs were separated within the state of Vermont by a non-MSA county, Addison County, which was comprised entirely of middle- and upper-income census tracts and did not contain any NBT branch locations. NBT operated four full-service branches, and one stand-alone deposit taking ATMs in the state of Vermont as of December 31, 2019. The four branches were equipped with deposit taking ATMs and represented 2.74 percent of the bank's total branch network.

NBT's strategy during the evaluation period emphasized organic loan and deposit growth. NBT's business activities include commercial banking, retail banking and wealth management services. Home mortgage loans and small business loans each accounted for approximately 50.0 percent of loan originations and purchases in Vermont during the evaluation period. The bank faced moderate competition for deposits and loans in the state.

NBT reported \$146.7 million in deposits, or 1.92 percent of the bank's total deposits in the state of Vermont, based on deposit information as of June 30, 2019. NBT ranked 12th out of 23 depository institutions with 1.63 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the combined AAs in the state of Vermont included People's United Bank, N. A. with 18.57 percent, TD Bank N. A. with 17.60 percent, New England FCU with 12.50 percent, KeyBank with 8.58 percent, and CBNA with 7.85 percent.

NBT originated and purchased 3.30 percent of its total home mortgage loans and 5.24 percent of its total small business loans in the state of Vermont AAs during the evaluation period.

Burlington-South Burlington MSA AA

NBT operated three branches equipped with deposit taking ATMs and one stand-alone, deposit-taking ATM in the Burlington-South Burlington MSA AA. The branches were in a moderate-income census tract, a middle-income census tract and an upper-income census tract in Chittenden County. The three branch locations accounted for 2.05 percent of NBT bank-wide branch network and 75.0 percent of the branches in Vermont as of December 31, 2019.

The bank faced strong competition for deposits and loans in the AA. NBT reported \$140.6 million in deposits in the Burlington-South Burlington MSA AA which represented 1.84 percent of the bank's total deposits and 95.82 percent of the deposits in the state of Vermont. NBT ranked 11th out of 18 depository institutions in the AA with 1.86 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included People's United Bank N. A. with 19.52 percent, TD Bank N. A. with 17.91 percent, New England Federal Credit Union (NEFCU) with 14.90 percent, KeyBank with 9.76 percent, and CBNA with 7.95 percent.

NBT originated and purchased 2.45 percent of its total home mortgage loans in the AA and 74.32 percent of home mortgage loans in the state in the Burlington-South Burlington MSA AA during the evaluation period. NBT originated and purchased 4.60 percent of its total small business loans in the AA and 87.84 percent of small business loans in the state in the Burlington-South Burlington MSA AA during the evaluation period.

Economic Data

According to September 2019 Moody's Analytics data, the Burlington-South Burlington VT MSA was in the late expansion stage of the business cycle. Moody's reported one of the most significant factors of this region's economy was the impact of the tourism industry which accounted for nearly half of the payroll gains reported during the previous year. A highly educated workforce and large college student population provided strength to an otherwise isolated region of the state. Population trends only slightly improved as the high travel costs, cold weather, and relatively higher tax environment presented significant challenges for families. Housing trends were favorable with falling mortgage rates alleviating some affordability concerns in the region. However, based on the 2019 MFI of \$91,600, low-income families making 50 percent or less of the MFI or \$45,800 would find it challenging to qualify for a mortgage loan given the \$263,536 median housing value in the AA.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Chittenden County was 1.6 percent, Franklin County was 2.1 percent and Grand

Isle County was 3.5 percent. The December 2019 state unemployment rate (not seasonally adjusted) for Vermont of 2.4 percent. The largest employers in the Burlington-South Burlington VT MSA included The University of Vermont Medical Center, the University of Vermont, GlobalFoundries, Shaw's Supermarkets Inc. and Wal-Mart Stores Inc.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact conducted during the evaluation period within the Burlington-South Burlington MSA AA to determine local economic conditions and community needs. The community contact indicated a need for community development lending within the assessment area and greater VT region. The contact noted rural areas in the region are economically disadvantaged and contain significant demographic factors, such as an aging and dwindling labor force, that can further exacerbate community credit needs. The contact noted opportunities for lending and investment within this assessment area, and specifically highlighted the 2019 expansion of the Working Communities challenge by the Federal Reserve Bank of Boston to the state of Vermont which encouraged funding of smaller cities and rural towns within the state to tackle problems of poverty or lack of affordable housing for low- and moderate-income residents.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	2.1	23.4	57.4	14.9	2.1
Population by Geography	215,081	1.4	19.4	60.3	18.9	0.0
Housing Units by Geography	94,009	1.4	22.0	60.6	15.9	0.0
Owner-Occupied Units by Geography	57,434	1.0	13.2	65.6	20.2	0.0
Occupied Rental Units by Geography	27,714	2.5	37.1	51.3	9.1	0.0
Vacant Units by Geography	8,861	0.8	32.1	57.6	9.5	0.0
Businesses by Geography	22,346	0.9	23.9	53.3	21.7	0.2
Farms by Geography	978	0.2	12.5	68.0	19.3	0.0
Family Distribution by Income Level	52,010	20.5	17.9	23.1	38.5	0.0
Household Distribution by Income Level	85,148	23.7	16.1	18.8	41.4	0.0
2019 Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$91,600	Median Housing Value			\$263,536
			Median Gross Rent			\$1,069
			Families Below Poverty Level			6.2%
<p><i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

VT Non-MSA AA

NBT operated one branch equipped with a deposit taking ATM in the VT Non-MSA AA. The branch was in a moderate-income census tract in Rutland County. The branch accounted for 0.68 percent of NBT bank-wide branch network and 25.0 percent of the branches in Vermont as of December 31, 2019.

Competition for deposits in the VT Non-MSA MSA AA was moderate. NBT reported \$6.1 million in deposits in the VT Non-MSA AA which represented 0.08 percent of the bank's total deposits and 4.18 percent of the deposits in the state of Vermont. NBT ranked 12th out of 12 depository institutions in the AA with 0.42 percent market share based on the deposit market share reports for June 30, 2019. The top banks in terms of deposit market share in the AA included Heritage Family Credit Union with 30.42 percent, TD Bank N. A. with 16.02 percent, People's United Bank N. A. with 13.63 percent, Citizens Bank N. A. with 10.21 percent, and CBNA with 7.32 percent.

NBT originated and purchased 0.85 percent of its total home mortgage loans in the AA and 25.68 percent of home mortgage loans in the state in the VT Non-MSA AA during the evaluation period. NBT originated and purchased 0.64 percent of its total small business loans in the AA and 12.16 percent of small business loans in the state in the VT Non-MSA AA during the evaluation period.

Economic Data

According to May 2019 Moody's Analytics data, the state of Vermont was in a late expansionary period during the middle of 2019 due to gains obtained in the tourism and healthcare sector, two of the state's largest economic drivers. However, Vermont lagged its neighboring states in terms of economic recovery due to an extremely tight labor market and overall low hourly wages within the dominant tourism industry that also experienced seasonality related to the skiing and college seasons. Healthcare services also comprised a significant portion of the state's economy as roughly a fifth of Vermont's population were age 65 or older. High business costs stemming from competition and an elevated tax rate, as well as high travel costs presented by geographic challenges also reduced the overall economic performance of the region.

According to the U.S. Bureau of Labor Statistics December 2019 data, the unemployment rate (not seasonally adjusted) for Rutland County was 2.4 percent which was consistent with the state unemployment rate (not seasonally adjusted) for Vermont of 2.4 percent. Top employers included Rutland Regional Medical Center, GE Aircraft Engines, Killington Pico Ski Resort Partners LLC, Green Mountain, Casella Waste Systems, and the Vermont Country Store.

Community Contacts

As part of the CRA evaluation, the OCC reviewed information from one community contact conducted during the evaluation period which covered a regional area including the VT Non-MSA AA to determine local economic conditions and community needs. The community contact identified affordable housing as a primary community development need of the VT Non-MSA AA. The contact also indicated a need for community services and economic development initiatives.

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	15.0	75.0	10.0	0.0
Population by Geography	60,530	0.0	20.2	65.5	14.3	0.0
Housing Units by Geography	33,742	0.0	17.1	71.1	11.8	0.0
Owner-Occupied Units by Geography	17,838	0.0	13.3	73.6	13.1	0.0
Occupied Rental Units by Geography	7,621	0.0	38.6	48.4	12.9	0.0
Vacant Units by Geography	8,283	0.0	5.5	86.6	7.9	0.0
Businesses by Geography	5,623	0.0	26.0	61.8	12.2	0.0
Farms by Geography	335	0.0	4.5	83.9	11.6	0.0
Family Distribution by Income Level	15,567	20.2	18.8	23.1	37.9	0.0
Household Distribution by Income Level	25,459	25.9	16.1	18.6	39.4	0.0
2019 Median Family Income Non-MSAs - VT		\$73,600	Median Housing Value			\$184,424
			Median Gross Rent			\$790
			Families Below Poverty Level			7.9%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Vermont

We conducted full-scope reviews of the Burlington-South Burlington MSA AA and the VT Non MSA AA. The Burlington-South Burlington MSA AA received the highest weighting of the two AAs as it accounted for 95.8 percent of deposits, 81.1 percent of lending and 75.0 percent of the branches in the state. Home mortgage loans and small business loans each accounted for approximately 50.0 percent of the loans made in the state's AAs during the evaluation period. Therefore, the performance for home mortgage and small business loans were equally weighted. NBT did not originate or purchase any small farm loans during the evaluation period in either of the two AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Vermont

LENDING TEST

The bank's performance under the Lending Test in Vermont is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Burlington-South Burlington MSA AA and VT Non-MSA AA is considered good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Burlington-South Burlington MSA AA	191	224	0	2	417	81.13	95.82
VT Non-MSA AA	66	31	0	0	97	18.87	4.18

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Burlington-South Burlington MSA AA	\$78,969	\$53,012	0	\$5,000	\$136,981	91.05	95.82
VT Non-MSA AA	\$9,606	\$3,863	0	\$0	\$13,469	8.95	4.18

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Burlington-South Burlington MSA AA

Lending levels reflect good responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$140.6 million in deposits in the Burlington-South Burlington MSA AA. As of June 30, 2019, the bank ranked 11th among 18 depository institutions, or the 39th percentile, with 1.86 percent market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 22nd out of 163 lending institutions for home mortgage loan originations and purchases, or the 87th percentile, with a market share of 1.12 percent demonstrating good responsiveness to credit needs. The top five home mortgage lenders, New England FCU, Vermont FCU, Northeast Home Loan LLC, Quicken Loans and Union Bank had a combined market share of 51.29 percent. Market share for the top five lenders ranged from 4.55 percent to 28.32 percent.

Based on 2018 CRA small business loan data, the bank ranked 17th out of 73 small business lenders, or the 77th percentile, with a 1.58 percent market share of demonstrating good responsiveness to credit needs when compared to deposit market share. The top five lenders in the market, American Express National Bank, Chase Bank, USA N. A., Citibank N. A. Capital One Bank (USA) N. A., and Peoples United Bank N. A. had a combined market share of 52.35 percent. Market share for the top five banks ranged from 5.29 percent to 18.19 percent. Four of the five had average loan sized ranging from \$6 thousand to \$14 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

VT Non-MSA AA

Lending levels reflect excellent responsiveness to AA credit needs.

According to 2019 peer deposit market share data, NBT reported \$6.1 million in deposits in the VT Non-MSA AA. This ranked NBT last among 12 deposit taking institutions with 0.42 percent market share in the AA.

Based on 2019 HMDA market share data, NBT ranked 10th out of 111 lending institutions for home mortgage loan originations and purchases, or the 91st percentile, with a 2.69 percent market share demonstrating excellent responsiveness to credit needs. The top five home mortgage lenders, Quicken Loans, CBNA, Vermont State Employees Credit Union, People's United Bank N. A. and PrimeLending had a combined market share of 37.29 percent. Market share for the top five lenders ranged from 5.56 percent to 8.50 percent.

Based on 2018 CRA small business loan data, the bank ranked 24th out of 50 small business lenders, or the 52nd percentile, with a 0.60 percent market share demonstrating excellent responsiveness to credit needs. The top five lenders in the market, American Express National Bank, Chase Bank USA N. A., Citibank N. A., Texas Capital Bank, and Capital One Bank (USA) N. A. had a combined market share of 50.75 percent. Market share for the top five banks ranged from 5.74 percent to 17.62 percent. The five lenders had average loan sizes ranging from \$5 thousand to \$13 thousand, indicative of credit card lending. NBT offered credit cards through a third-party referral program.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent.

Burlington-South Burlington MSA AA

The geographic distribution of home mortgage loans is excellent. The percentage of home mortgage loans in both low- and moderate-income census tracts significantly exceeded both the percentage of owner-occupied units and aggregate lending in the AA.

VT Non-MSA AA

The geographic distribution of home mortgage loans is excellent. The AA does not include any low-income census tracts. The percentage of home mortgage loans in moderate-income census tracts significantly exceeded both the percentage of owner-occupied units and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate

Burlington-South Burlington MSA AA

The geographic distribution of small loans to businesses is adequate. The bank did not originate any small loans to businesses in low-income census tracts. The geographic distribution of small loans to businesses in moderate-income census tracts was below both the percentage of businesses and aggregate lending in the AA.

The assessment of performance in low-income census tracts considered the limited number of businesses, 203, in low-income census tracts and AA competition. NBT faced competition from credit card companies, large banks and multi-national companies. In 2018, the top five lenders in low-income census tracts, Chase Bank USA N. A., American Express National Bank, Capital One Bank (USA) N. A., Citibank N. A., and TD Bank N. A. (tie with Texas Capital Bank), had a combined market share of 82.34 percent in the low-income census tracts.

VT Non-MSA AA

The geographic distribution of small loans to businesses is poor. The AA does not include any low-income census tracts. The geographic distribution of small loans to businesses in moderate-income census tracts was well below both the percentage of businesses and aggregate lending in the AA.

The assessment of performance in moderate-income census tracts considered AA competition. NBT faced competition from credit card companies, large banks and multi-national companies. In 2018, the top five lenders in moderate-income census tracts, American Express National Bank, Chase Bank USA N. A., Citibank N. A., US Bank N. A., and Capital One Bank (USA) N. A (tie with Lake Forest Bank and Trust, had a combined market share of 57.85 percent in the low-income census tracts.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of NBT's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans in the state of Vermont is adequate.

The assessment of the borrower distribution of home mortgage loans for the Burlington-South Burlington MSA AA considered the high cost of home ownership would not be affordable for low-income borrowers earning no more than 50 percent of the assessment area median family income, as highlighted in the affordability table below using 2019 FFIEC adjusted median family income. Refer to discussion within the Burlington-South Burlington assessment area for specific analysis as to the affordability of home ownership for low-income borrowers.

State of VT Affordability Table 2019:

MSA Name	2019 Updated MFI	Maximum Low-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	Maximum Moderate-Income Annual Income	Maximum Affordable Mortgage Amount	Maximum Monthly Mortgage Payment	2019 Median Home Listing Price*	Mortgage Payment Based on Listing Price
Burlington-South Burlington MSA AA	\$91,600	\$45,800	\$213,292	\$1,145	\$73,280	\$341,268	\$1,832	\$282,450	\$1,516
VT Non-MSA AA	\$73,600	\$36,800	\$171,379	\$920	\$58,880	\$274,207	\$1,472	\$169,000	\$907

*Source – Realtor.com median listing price data as of December 2019

Burlington-South Burlington MSA AA

The borrower distribution of home mortgage loans is adequate. The percentage of home mortgage loans to low-income borrowers was well below both the percentage of low-income families and aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near the percentage of moderate-income families and below the aggregate lending in the AA.

The assessment of performance considered the affordability of home ownership for low-income borrowers in the Burlington-South Burlington MSA AA and the bank's market share for home mortgage loans to low-income families compared to its overall market share. As noted previously, home ownership for low-income borrowers in the Burlington-South Burlington MSA AA during the evaluation period was not affordable. Specifically, for this AA, assuming a 30-year mortgage with a 5 percent interest rate, and not account for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,800 per year (or less than 50 percent of the 2019 FFIEC adjusted median family income in the MSA) could only afford a \$213,292 which is below the 2019 median housing value of \$263,536 and 2019 median home listing price of \$282,450 (based on the December 2019 median listing price from Realtor.com).

The bank ranked 19th out of 55 lenders who made home mortgage loans to low-income borrowers in the AA with 1.00 percent market share which was near to its 2019 overall home mortgage loan ranking of 22nd out of 163 lenders and a market share of 1.12 percent. Collectively, New England FCU, Vermont FCU, Quicken Loans, Union Bank, and CBNA had a combined market share of 54.16 percent. Market share for the top five lenders ranged from 4.00 percent to 28.33 percent.

VT Non-MSA AA

The borrower distribution of home mortgage loans is good. The percentage of home mortgage loans to low-income borrowers was near the percentage of low-income families and exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and near aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the state of Vermont is adequate.

Burlington-South Burlington MSA AA

The borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage those businesses and was below aggregate lending in the AA.

The assessment of performance considered the bank's market share for small loans to businesses with revenues less than \$1 million compared to its overall market share for small loans to businesses. In 2018, the bank ranked 16th out of 73 lenders with 1.28 percent market share for lenders making small loans to businesses with revenues less than \$1 million which was near its overall small business lending market share of 1.58 percent and ranking of 17th out of 73 lenders. Collectively, American Express National Bank, Citibank N. A., Capital One Bank (USA) N. A., TD Bank N. A., and Chase Bank USA N. A., accounted for 63.02 percent of the market share for small loans to businesses with revenues of \$1 million or less in the AA.

VT Non-MSA AA

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses and exceeded aggregate lending in the AA.

The assessment of performance considered the bank's market share for small loans to businesses with revenues less than \$1 million compared to its overall market share for small loans to businesses. In 2018, the bank ranked 21st out of 50 lenders with 0.46 percent market share for lenders making small loans to businesses with revenues less than \$1 million which was near to its overall small business lending market share of 0.60 percent and ranking of 24th out of 50 lenders. Collectively, American Express National Bank, Citibank N. A., TD Bank N. A., US Bank N. A., and Capital One Bank (USA) N. A. accounted for 58.80 percent of the market share for small loans to businesses with revenues of \$1 million or less in the AA.

Community Development Lending

The institution has made a relatively high level of CD loans in the state of Vermont.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Burlington-South Burlington MSA AA

NBT had a relatively high level of CD loans in the Burlington-South Burlington MSA AA. During the evaluation period, NBT made two CD loans totaling \$5 million to a local small business for the purposes of economic development that led to the creation of 50 low- and/or moderate-income jobs

VT Non-MSA AA

The bank did not originate and/or purchase any qualified CD loans within this AA during our evaluation period.

Vermont Statewide

NBT also made a \$4 million affordable housing CD loan within the state of Vermont that did not have a specific purpose, mandate or focus benefiting the bank's AA. The loan supported a local affordable housing organization in nearby Addison County, VT that provided housing for LMI families.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve credit needs within the state of Vermont. Innovative/flexible lending practices overall may vary but primarily consist of both HMDA-reportable loan programs, such as FHA, USDA Rural, and First Home Loan programs, as well as CRA small business-reportable SBA 7a and 504 programs.

Burlington-South Burlington MSA AA

NBT makes limited use of innovative and flexible lending practices in the Burlington-South Burlington MSA AA. During the evaluation period, NBT originated loans totaling \$120 thousand under the bank's CRA program for affordable home loans and six loans totaling \$1.5 million under the Home in the City LMI Loan program.

VT Non-MSA AA

NBT makes limited use of innovate and flexible lending practices in the VT Non-MSA AA. During the evaluation period, NBT originated five loans totaling \$459 thousand under the First Home Loan program and loans totaling \$221 under the Home in the City LMI Loan program.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated High Satisfactory.

Conclusions for Area Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Burlington-South Burlington MSA and VT Non-MSA AA(s) is good.

The institution has a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Burlington-South Burlington MSA AA	4	3,811	13	3,031	17	62.96	6,842	86.08	0	0
VT Non-MSA AA	1	667	9	439	10	37.04	1,106	13.92	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments in the full-scope AAs included:

- One government-backed affordable housing MBS, of which \$3.0 million was allocated to the Burlington-South Burlington MSA AA and \$431 thousand was allocated to the VT Non-MSA AA.
- Three grants totaling \$13 thousand to provide affordable housing for LMI individuals in the Burlington-South Burlington MSA AA.
- Three grants \$5 thousand to provide affordable housing for LMI individuals in the VT Non-MSA AA.

Burlington-South Burlington MSA AA

The institution had a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The institution exhibited adequate responsiveness to credit and community economic development needs. NBT made 13 qualified investments, donations, and grants totaling \$3.0 million in the Burlington-South Burlington MSA AA during the evaluation period. The allocated portions of the affordable housing MBS noted above represented a substantial majority of the investment in this AA. The bank also had four prior period LIHTCs with a remaining balance of \$3.8 million as of December 31, 2019 allocated to the AA. Investments, donations and grants supported CD needs, primarily for affordable housing, community service to LMI, and economic development purposes.

VT Non-MSA AA

The institution had a significant level of qualified investments and grants, rarely in a leadership position, nor those that are not routinely provided by private investors. The institution exhibited adequate

responsiveness to credit and community economic development needs. NBT made nine qualified investments, donations, and grants totaling \$439 thousand in the VT Non-MSA AA during the evaluation period. The allocated portions of the affordable housing MBS noted above represent almost the entirety of the investment in this AA. The bank also had one LIHTC with a remaining balance of \$667 thousand allocated to the AA. Investments, donations and grants supported CD needs, primarily for affordable housing, community service to LMI, and economic development purposes.

SERVICE TEST

The bank’s performance under the Service Test in Vermont is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Burlington-South Burlington MSA and VT Non-MSA AA(s) is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA(s).

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Burlington-South Burlington MSA AA	95.8	3	75.0	0	33.3	33.3	33.3	1.4	19.4	60.3	18.9
VT Non-MSA AA	4.2	1	25.0	N/A	100.0	0	0	0.0	20.2	65.5	14.3

Burlington-South Burlington MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Burlington-South Burlington MSA AA. NBT operated three branches in the AA including one branch in a moderate-income census tract, proportionate with the population distribution. The bank’s three branches and the one stand-alone deposit taking ATM were enhanced with deposit automation which provided faster access to funds and images of deposited checks.

VT Non-MSA AA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the VT Non-MSA AA. Branch distribution in moderate-income census tracts was proportionate with the population distribution. The AA did not include any low-income census tracts. The branch

included a deposit-taking ATM enhanced with deposit automation which provided faster access to funds and images of deposited checks.

The bank did not open or close any branches in the state of Vermont during the evaluation period.

Services, including where appropriate, business hours do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals.

Burlington-South Burlington MSA AA

In the Burlington-South Burlington MSA AA, services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours Monday through Saturday, had 24-hour onsite ATMs, and offered traditional banking services throughout its branches. The downtown Burlington branch, in a moderate-income census tract, did not have Saturday hours due to a lack of foot traffic which is reasonable. The branch offered a deposit taking ATM enhanced with deposit automation which provided faster access to funds and images of deposited checks.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported one customer from low-income census tracts and 14 customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 25 Classic Checking customers from low-income census tracts in the AA and 187 Classic Checking customers from moderate-income census tracts in the AA.

VT Non-MSA AA

In the VT Non-MSA AA, services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. NBT maintained standard business hours Monday through Friday, had a 24-hour onsite ATM, and offered traditional banking services throughout its branches.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank reported three customers from moderate-income census tracts used mobile banking. The bank did not provide metrics on the other alternative delivery systems to demonstrate the effectiveness in helping meet the needs of LMI individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products included Classic Checking accounts with no maintenance fees, a Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship and Assist Checking for individuals with developmental disabilities. Management reported 86 Classic Checking customers from moderate-income census tracts in the AA.

Community Development Services

The institution provides an adequate level of CD services.

Burlington-South Burlington MSA AA

NBT provided an adequate level of CD services in the Burlington-South Burlington MSA AA. During the evaluation period, one employee provided 39 hours to an organization providing affordable housing.

VT Non-MSA AA

NBT provided a low level of CD services in the VT Non-MSA AA. During the evaluation period, one bank employee provided six service hours to a non-profit organization providing affordable housing.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2017 through 12/31/2019	
Bank Products Reviewed:	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None reviewed	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Maine		
Portland-South Portland MSA AA	Full-scope	Cumberland County, York County, Sagadahoc County
State of Massachusetts		
Pittsfield MSA AA	Full-scope	Berkshire County
State of New Hampshire		
Manchester-Nashua MSA AA	Full-scope	Hillsborough County
Rockingham-Strafford MD AA	Full-scope	Rockingham County, Strafford County
NH Non-MSA AA	Limited-scope	Cheshire County
State of New York		
Albany-Schenectady-Troy MSA AA	Full-scope	Albany County, Rensselaer County, Saratoga County, Schenectady County, Schoharie County
NY Non-MSA AA	Full-scope	Chenango County, Clinton County, Cortland County, Delaware County, Essex County, Franklin County, Fulton County, Greene County, Hamilton County, Montgomery County, Otsego County, St. Lawrence County
Syracuse MSA AA	Full-scope	Madison County, Onondaga County, Oswego County
Utica-Rome MSA AA	Full-scope	Herkimer County, Oneida County
Binghamton MSA AA	Limited-scope	Broome County, Tioga County
Glens Falls MSA AA	Limited-scope	Warren County, Washington County
State of Pennsylvania		
PA Non-MSA AA	Full-scope	Susquehanna County, Wayne County
Scranton-Wilkes-Barre MSA AA	Full-scope	Lackawanna County, Luzerne County, Wyoming County
East Stroudsburg MSA AA	Limited-scope	Monroe County
Newark MD AA	Limited-scope	Pike County
State of Vermont		
Burlington-South Burlington MSA AA	Full-scope	Chittenden County, Franklin County, Grand Isle County
VT Non-MSA AA	Full-scope	Rutland County

Appendix B: Summary of MMSA and State Ratings

RATINGS NBT Bank, N. A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
NBT Bank, N. A.	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
State of Maine	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Massachusetts	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New Hampshire	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New York	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Pennsylvania	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Vermont	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c) through (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated the same as originations; and “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The following tables apply to the State of New York Assessment Only

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

State of Maine

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Portland-South Portland MSA AA	61	90,000	100.0	24,548	0.9	8.2	1.6	16.4	26.2	18.2	60.5	47.5	57.5	22.3	18.0	22.7	0.0	0.0	0.0
Total	61	90,000	100.0	24,548	0.9	8.2	1.6	16.4	26.2	18.2	60.5	47.5	57.5	22.3	18.0	22.7	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Portland-South Portland MSA AA	61	90,000	100.0	24,548	20.7	14.8	6.9	17.8	26.2	19.7	21.8	4.9	22.5	39.7	8.2	37.6	0.0	45.9	13.3
Total	61	90,000	100.0	24,548	20.7	14.8	6.9	17.8	26.2	19.7	21.8	4.9	22.5	39.7	8.2	37.6	0.0	45.9	13.3

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Maine

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Portland-South Portland MSA AA	26	4,569	100.0	12,858	2.5	0.0	2.5	26.2	30.8	23.2	50.4	50.0	51.3	20.9	19.2	23.0	0.0	0.0	0.0	
Total	26	4,569	100.0	12,858	2.5	0.0	2.5	26.2	30.8	23.2	50.4	50.0	51.3	20.9	19.2	23.0	0.0	0.0	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Portland-South Portland MSA AA	26	4,569	100.0	12,858	83.3	19.2	44.6	6.1	3.8	10.6	76.9		
Total	26	4,569	100.0	12,858	83.3	19.2	44.6	6.1	3.8	10.6	76.9		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Massachusetts

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Pittsfield MSA AA	122	19,698	100.0	3,396	3.1	11.5	4.6	10.2	14.8	9.1	55.5	52.5	53.5	31.2	21.3	32.8	0.0	0.0	0.0
Total	122	19,698	100.0	3,396	3.1	11.5	4.6	10.2	14.8	9.1	55.5	52.5	53.5	31.2	21.3	32.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsfield MSA AA	122	19,698	100.0	3,396	21.3	10.7	10.0	17.6	13.9	21.1	20.5	25.4	20.5	40.6	30.3	35.8	0.0	19.7	12.6
Total	122	19,698	100.0	3,396	21.3	10.7	10.0	17.6	13.9	21.1	20.5	25.4	20.5	40.6	30.3	35.8	0.0	19.7	12.6

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Massachusetts

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsfield MSA AA	61	10,452	100.0	2,508	13.6	4.9	11.4	6.6	8.2	7.1	42.7	39.3	42.9	37.1	47.5	38.6	0.0	0.0	0.0
Total	61	10,452	100.0	2,508	13.6	4.9	11.4	6.6	8.2	7.1	42.7	39.3	42.9	37.1	47.5	38.6	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-19

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsfield MSA AA	61	10,452	100.0	2,508	82.3	62.3	46.3	5.8	34.4	11.9	3.3
Total	61	10,452	100.0	2,508	82.3	62.3	46.3	5.8	34.4	11.9	3.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of New Hampshire

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Manchester-Nashua MSA AA	173	80,419	57.5	17,384	2.2	20.8	3.4	14.6	28.3	14.9	44.2	28.3	42.2	39.0	22.5	39.5	0.0	0.0	0.0
NH Non MSA AA	25	4,577	8.3	1,864	0.0	0.0	0.0	12.1	4.0	8.5	75.6	80.0	72.5	12.3	16.0	19.0	0.0	0.0	0.0
Rockingham-Strafford MSA AA	103	32,576	34.2	20,364	1.1	3.9	1.2	17.7	29.1	17.1	59.2	53.4	58.9	22.1	13.6	22.7	0.0	0.0	0.0
Total	301	117,571	100.0	39,612	1.5	13.3	2.1	15.9	26.6	15.8	54.3	41.2	52.2	28.3	18.9	29.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of New Hampshire

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Manchester-Nashua MSA AA	173	80,419	57.5	17,384	20.3	4.6	6.8	17.8	16.2	22.1	22.1	7.5	24.7	39.8	26.0	31.2	0.0	45.7	15.2
NH Non MSA AA	25	4,577	8.3	1,864	20.0	0.0	6.8	18.0	28.0	23.6	23.0	8.0	25.6	39.1	52.0	30.3	0.0	12.0	13.8
Rockingham-Strafford MD AA	103	32,576	34.2	20,364	19.1	4.9	6.7	18.3	28.2	20.3	23.0	12.6	25.4	39.7	37.9	34.1	0.0	16.5	13.5
Total	301	117,571	100.0	39,612	19.7	4.3	6.7	18.0	21.3	21.2	22.6	9.3	25.1	39.7	32.2	32.7	0.0	32.9	14.3

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New Hampshire

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Manchester-Nashua MSA AA	114	30,788	47.1	8,331	7.8	7.9	7.4	20.8	28.9	17.4	38.3	43.9	38.6	32.7	19.3	36.2	0.5	0.0	0.3
NH Non MSA AA	73	25,667	30.2	1,336	0.0	0.0	0.0	6.8	0.0	6.4	80.3	82.2	78.7	13.0	17.8	14.8	0.0	0.0	0.0
Rockingham-Strafford MSA AA	55	12,284	22.7	10,391	1.5	0.0	1.1	17.9	12.7	15.6	58.3	67.3	60.0	22.0	20.0	23.0	0.3	0.0	0.3
Total	242	68,739	100.0	20,058	4.1	3.7	3.6	18.4	16.5	15.7	51.2	60.7	52.4	25.9	19.0	28.0	0.4	0.0	0.3

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Manchester-Nashua MSA AA	114	30,788	47.1	8,331	83.9	46.5	43.5	6.3	39.5	9.8	14.0
NH Non MSA AA	73	25,667	30.2	1,336	82.3	42.5	50.6	6.1	52.1	11.6	5.5
Rockingham-Strafford MSA AA	55	12,284	22.7	10,391	84.7	23.6	43.9	5.9	40.0	9.4	36.4
Total	242	68,739	100.0	20,058	84.2	40.1	44.2	6.1	43.4	9.7	16.5

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New York

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Albany-Schenectady-Troy MSA AA	620	177,714	10.7	25,534	2.9	1.9	2.7	14.6	19.0	13.8	54.7	57.7	54.4	27.8	21.0	29.0	0.0	0.3	0.0
Binghamton MSA AA	367	34,044	6.4	4,673	2.7	3.5	2.0	9.3	8.4	9.1	60.1	66.8	57.7	27.9	21.3	31.2	0.0	0.0	0.0
Glens Falls MSA AA	235	55,399	4.1	3,422	0.0	0.0	0.0	4.1	6.8	5.6	83.8	80.9	81.4	12.2	12.3	13.0	0.0	0.0	0.0
NY Non MSA AA	2,502	274,728	43.3	10,815	0.8	0.4	0.9	7.8	7.2	7.4	76.2	76.7	73.2	15.2	15.7	18.5	0.0	0.1	0.0
Syracuse MSA AA	1,297	203,256	22.4	15,919	2.6	0.9	1.8	14.0	17.5	12.5	51.7	46.7	50.2	31.6	34.8	35.4	0.1	0.1	0.1
Utica-Rome MSA AA	757	96,429	13.1	6,046	5.0	2.2	5.3	7.2	5.5	7.2	60.0	51.3	56.8	27.8	41.0	30.7	0.0	0.0	0.0
Total	5,778	841,570	100.0	66,409	2.4	1.1	2.2	11.1	10.6	11.1	61.5	64.1	58.3	25.0	24.1	28.3	0.0	0.1	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of New York

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albany-Schenectady-Troy MSA AA	620	177,714	10.7	25,534	20.3	11.0	8.7	17.8	21.3	22.4	22.2	17.9	24.6	39.7	37.4	32.1	0.0	12.4	12.2
Binghamton MSA AA	367	34,044	6.4	4,673	21.6	14.4	9.8	16.9	27.0	21.7	21.6	21.3	23.2	39.9	32.2	31.2	0.0	5.2	14.1
Glens Falls MSA AA	235	55,399	4.1	3,422	20.2	4.7	5.7	17.1	12.3	19.6	23.8	14.0	24.5	38.9	52.3	38.9	0.0	16.6	11.3
NY Non MSA AA	2,502	274,728	43.3	10,815	21.5	8.6	5.8	17.3	16.1	17.3	21.5	23.6	23.9	39.6	45.0	40.2	0.0	6.8	12.9
Syracuse MSA AA	1,297	203,256	22.4	15,919	21.8	8.6	10.5	17.2	20.6	22.8	20.4	19.8	22.5	40.6	46.6	32.1	0.0	4.5	12.1
Utica-Rome MSA AA	757	96,429	13.1	6,046	22.0	7.7	11.0	16.9	17.6	22.2	21.5	21.0	24.0	39.6	47.2	32.1	0.0	6.6	10.7
Total	5,778	841,570	100.0	66,409	21.2	8.9	8.8	17.3	18.4	21.5	21.6	21.3	23.8	39.8	44.3	33.7	0.0	7.1	12.2

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New York

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albany-Schenectady-Troy MSA AA	502	72,430	13.2	14,221	11.5	9.2	8.9	12.9	15.5	11.8	48.1	54.4	48.2	27.0	20.3	30.8	0.5	0.6	0.3
Binghamton MSA AA	328	35,773	8.6	3,094	10.0	26.5	8.8	11.2	8.5	11.7	58.6	56.7	58.1	20.2	8.2	21.5	0.0	0.0	0.0
Glens Falls MSA AA	198	32,343	5.2	2,071	0.0	0.0	0.0	9.1	16.2	8.1	81.9	79.3	83.4	8.9	4.5	8.5	0.0	0.0	0.0
NY Non MSA AA	1,292	154,173	33.9	7,847	2.1	1.3	2.4	10.7	10.9	8.5	69.1	71.9	69.9	17.6	15.7	19.1	0.4	0.2	0.1
Syracuse MSA AA	898	123,270	23.6	10,326	8.0	4.6	6.8	14.4	12.9	12.4	43.8	60.4	43.6	31.5	20.9	35.4	2.4	1.2	1.9
Utica-Rome MSA AA	591	89,480	15.5	3,838	11.9	10.5	10.8	13.5	16.9	11.1	47.8	42.6	47.2	25.4	26.7	29.4	1.5	3.2	1.5
Total	3,809	507,469	100.0	41,397	8.1	6.6	6.9	12.5	13.0	11.0	53.8	61.4	53.6	24.6	18.0	27.8	0.9	0.9	0.7

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New York

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albany-Schenectady-Troy MSA AA	502	72,430	13.2	14,221	81.3	53.8	44.0	5.9	35.5	12.8	10.8	
Binghamton MSA AA	328	35,773	8.6	3,094	80.0	39.9	42.8	6.1	50.6	13.9	9.5	
Glens Falls MSA AA	198	32,343	5.2	2,071	82.0	42.9	44.1	5.2	50.5	12.8	6.6	
NY Non MSA AA	1,292	154,173	33.9	7,847	79.0	57.6	44.9	5.7	35.9	15.3	6.5	
Syracuse MSA AA	898	123,270	23.6	10,326	79.9	41.5	44.1	6.7	53.0	13.4	5.5	
Utica-Rome MSA AA	591	89,480	15.5	3,838	79.6	48.1	46.6	6.3	44.0	14.1	8.0	
Total	3,809	507,469	100.0	41,397	80.3	49.5	44.3	6.1	43.2	13.7	7.3	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of New York

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Albany-Schenectady-Troy MSA AA	41	3,313	6.5	127	1.6	0.0	0.8	12.7	56.1	24.4	65.0	43.9	63.0	20.7	0.0	11.8	0.1	0.0	0.0
Binghamton MSA AA	18	1,687	4.0	60	2.6	0.0	0.0	5.2	0.0	0.0	74.8	94.4	80.0	17.4	5.6	20.0	0.0	0.0	0.0
Glens Falls MSA AA	25	3,174	4.4	56	0.0	0.0	0.0	0.8	0.0	1.8	80.2	92.0	76.8	19.0	8.0	21.4	0.0	0.0	0.0
NY Non MSA AA	362	28,380	57.2	465	0.3	0.0	0.2	6.1	19.3	11.4	80.5	78.2	81.3	13.1	2.5	7.1	0.0	0.0	0.0
Syracuse MSA AA	109	10,677	17.2	148	2.3	0.0	0.7	11.8	20.2	10.1	53.5	73.4	70.3	31.8	6.4	18.2	0.6	0.0	0.7
Utica-Rome MSA AA	78	7,871	12.3	118	1.3	0.0	0.0	3.0	0.0	0.8	72.2	88.5	85.6	23.5	11.5	13.6	0.0	0.0	0.0
Total	633	55,102	100.0	974	1.3	0.0	0.3	8.1	18.2	10.4	70.1	77.4	77.4	20.5	4.4	11.8	0.1	0.0	0.1

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of New York

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albany-Schenectady-Troy MSA AA	41	3,313	6.5	127	96.7	78.0	51.2	2.1	22.0	1.2	0.0
Binghamton MSA AA	18	1,687	2.8	60	97.6	77.8	55.0	1.6	11.1	0.8	11.1
Glens Falls MSA AA	25	3,174	3.9	56	96.2	72.0	30.4	2.8	28.0	1.0	0.0
NY Non MSA AA	362	28,380	57.2	465	97.1	82.3	54.8	1.9	13.8	0.9	3.9
Syracuse MSA AA	109	10,677	17.2	148	95.2	85.3	48.0	2.9	11.0	1.9	3.7
Utica-Rome MSA AA	78	7,871	12.3	118	97.3	84.6	56.8	0.9	10.3	1.8	5.1
Total	633	55,102	100.0	974	96.6	82.3	52.2	2.1	13.9	1.3	3.8

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Pennsylvania

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
East Stroudsburg MSA AA	76	7,100	6.0	5,596	0.0	0.0	0.0	8.0	5.3	10.3	86.4	94.7	85.7	5.6	0.0	4.0	0.0	0.0	0.0
Newark MD AA	141	19,570	11.1	2,507	0.0	0.0	0.0	54.3	56.0	48.4	45.7	44.0	51.6	0.0	0.0	0.0	0.0	0.0	0.0
PA Non MSA AA	328	32,986	25.8	2,520	0.0	0.0	0.0	8.7	9.1	8.5	81.7	83.2	82.9	9.5	7.6	8.6	0.0	0.0	0.0
Scranton-Wilkes-Barre MSA AA	725	72,785	57.1	12,827	1.6	1.1	1.5	14.2	10.9	13.4	56.5	57.4	51.8	27.6	30.5	33.2	0.0	0.1	0.0
Total	1,270	132,441	100.0	23,450	1.0	0.6	0.8	15.4	15.1	15.9	64.2	64.8	63.2	19.4	19.4	20.1	0.0	0.1	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Pennsylvania

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
East Stroudsburg MSA AA	76	7,100	6.0	5,596	20.7	21.1	7.4	18.1	22.4	20.6	21.3	27.6	23.2	39.9	26.3	30.2	0.0	2.6	18.6
Newark MD AA	141	19,570	11.1	2,507	30.5	19.1	14.7	24.0	22.0	23.1	23.3	27.7	20.6	22.2	29.8	25.2	0.0	1.4	16.3
PA Non MSA AA	328	32,986	25.8	2,520	16.6	12.2	5.1	17.4	16.8	14.9	22.6	27.4	20.7	43.4	41.8	47.5	0.0	1.8	11.7
Scranton-Wilkes-Barre MSA AA	725	72,785	57.1	12,827	21.3	10.6	9.1	17.6	24.7	19.2	20.5	24.3	22.2	40.6	37.1	34.5	0.0	3.3	15.1
Total	1,270	132,441	100.0	23,450	21.3	12.6	8.8	18.1	22.2	19.5	21.1	25.7	22.1	39.5	36.9	33.9	0.0	2.7	15.7

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Pennsylvania

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
East Stroudsburg MSA AA	57	3,897	12.1	2,979	0.0	0.0	0.0	19.2	12.3	16.0	75.6	86.0	77.0	5.2	1.8	7.0	0.0	0.0	0.0
Newark MSA AA	39	3,261	8.2	1,004	0.0	0.0	0.0	51.4	53.8	66.1	48.6	46.2	33.9	0.0	0.0	0.0	0.0	0.0	0.0
PA Non MSA AA	107	7,720	22.6	1,667	0.0	0.0	0.0	14.8	1.9	11.0	74.3	91.6	80.5	10.8	6.5	8.5	0.0	0.0	0.0
Scranton-Wilkes-Barre MSA AA	270	36,029	57.1	9,485	2.6	2.2	2.4	18.8	9.6	17.9	51.7	67.8	51.7	24.7	19.6	26.0	2.1	0.7	1.8
Total	473	50,907	100.0	15,135	1.7	1.3	1.5	20.4	11.8	20.0	58.1	73.6	58.7	18.4	12.9	18.6	1.4	0.4	1.2

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
East Stroudsburg MSA AA	57	3,897	12.1	2,979	87.5	61.4	45.7	3.7	31.6	8.9	7.0
Newark MD AA	39	3,261	8.2	1,004	89.4	89.7	49.3	2.9	2.6	7.7	7.7
PA Non MSA AA	107	7,720	22.6	1,667	87.2	69.2	42.0	4.0	24.3	8.8	6.5
Scranton-Wilkes-Barre MSA AA	270	36,029	57.1	9,485	83.2	53.7	42.2	5.4	33.0	11.4	13.3
Total	473	50,907	100.0	15,135	84.7	61.1	43.3	4.8	28.3	10.5	10.6

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of Vermont

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Burlington-South Burlington MSA AA	191	78,969	74.3	7,840	1.0	2.1	1.2	13.2	17.3	11.9	65.6	52.9	66.3	20.2	27.7	20.6	0.0	0.0	0.0
VT Non MSA AA	66	9,606	25.7	1,188	0.0	0.0	0.0	13.3	19.7	12.6	73.6	65.2	73.6	13.1	15.2	13.8	0.0	0.0	0.0
Total	257	88,575	100.0	9,028	0.8	1.6	1.0	13.2	17.9	12.0	67.5	56.0	67.2	18.5	24.5	19.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Burlington-South Burlington MSA AA	191	78,969	74.3	7,840	20.5	3.7	7.7	17.9	15.2	21.5	23.1	18.8	25.0	38.5	48.2	36.9	0.0	14.1	8.9
VT Non MSA AA	66	9,606	25.7	1,188	20.2	12.1	7.3	18.8	19.7	21.7	23.1	19.7	23.5	37.9	37.9	34.2	0.0	10.6	13.3
Total	257	88,575	100.0	9,028	20.4	5.8	7.6	18.1	16.3	21.5	23.1	19.1	24.8	38.3	45.5	36.5	0.0	13.2	9.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

State of Vermont

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-19
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Burlington-South Burlington MSA AA	224	53,012	87.8	4,886	0.9	0.0	1.0	23.9	17.0	21.5	53.3	53.6	54.5	21.7	29.5	22.7	0.2	0.0	0.2	
VT Non MSA AA	31	3,863	12.2	963	0.0	0.0	0.0	26.0	12.9	19.2	61.8	71.0	64.3	12.2	16.1	16.5	0.0	0.0	0.0	
Total	255	56,875	100.0	5,849	0.7	0.0	0.9	24.3	16.5	21.1	55.1	55.7	56.1	19.8	27.8	21.7	0.2	0.0	0.2	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-19
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Burlington-South Burlington MSA AA	224	53,012	87.8	4,886	85.9	33.0	39.4	5.2	58.5	8.9	8.5	
VT Non MSA AA	31	3,863	12.2	963	83.7	51.6	44.7	5.3	19.4	11.0	29.0	
Total	255	56,875	100.0	5,849	85.5	35.3	40.3	5.2	53.7	9.3	11.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%