



**LARGE BANK**

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## **Public Disclosure**

**March 11, 2002**

# **Community Reinvestment Act Performance Evaluation**

**Eisenhower National Bank  
Charter Number: 16144**

**2302 Stanley Road  
Fort Sam Houston, TX 78234**

**Office of the Comptroller of the Currency  
San Antonio - North Field Office  
10101 Reunion Place, Suite 402  
San Antonio, TX 78216**

**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.**

## Table of Contents

<b><u>OVERALL CRA RATING</u></b> .....	1
<b><u>DEFINITIONS AND COMMON ABBREVIATIONS</u></b> .....	2
<b><u>DESCRIPTION OF INSTITUTION</u></b> .....	5
<b><u>SCOPE OF THE EVALUATION</u></b> .....	6
<b><u>FAIR LENDING REVIEW</u></b> .....	8
<b><u>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS</u></b> .....	9
<u>LENDING TEST</u> .....	9
<u>INVESTMENT TEST</u> .....	11
<u>SERVICE TEST</u> .....	11
<b><u>APPENDIX A: SCOPE OF EXAMINATION</u></b> .....	A-1
<b><u>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS</u></b> .....	B-1
<b><u>APPENDIX C: TABLES OF PERFORMANCE DATA</u></b> .....	C-1

## Overall CRA Rating

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

The following table indicates the performance level of **Eisenhower National Bank (ENB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
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:

- Lending activity reflects an adequate response to the primary credit needs of ENB's assessment area.
- ENB's distribution of consumer loans, its primary product, is adequate.
- ENB has provided an adequate level of community development investments, given the limited opportunities for qualifying investments on U.S. military installations.
- The level of retail banking services provided to its assessment is good.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full 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 or a block numbering area 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 do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home Mortgage Loans:** These loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

**Metropolitan Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 One 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

Eisenhower National Bank (ENB), is an intrastate bank headquartered on Fort Sam Houston, within the City of San Antonio, Texas. As of December 31, 2001, ENB is wholly owned by Broadway Bancshares, Inc., a \$1.277 billion multi-bank holding company based in San Antonio, and the bank had total assets of \$149 million. ENB has nine banking locations; all but one is on U.S. military installations in Texas. Three are on Army posts, four are on Air Force bases, one is on a Naval Air Station, and one is just outside an Army post. ENB opened in June 1973 to serve military customers, their families and U.S. Department of Defense civilians.

The bank's business strategy is targeted to all active, reserve and retired U.S. military personnel and their dependents, and all junior and senior level college ROTC cadets under contract to serve in the military.

- ENB offers the full range of deposit products and consumer loan products. Home mortgage, commercial, and commercial real estate loan products are offered primarily on a referral basis through its affiliate, Broadway National Bank in San Antonio, Texas.
- Net Loans represents 17% of total assets as of December 31, 2001. Consumer loans are the major loan product with 61% of total loans, followed by loans secured by real estate at 36%. Commercial loans are 1% of total loans, and other loans are 2%. ENB has Tier 1 capital of \$16,407 resulting in a Tier 1 leverage ratio of 11.23%

Outside of the limitations on the bank's CRA performance due to its military customer focus, there are no legal, financial, or other factors, which impede the bank's ability to meet the credit needs in its assessment area. ENB's last CRA examination, dated March 10, 1997, ENB was rated "Satisfactory".

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, not including CD loans, is January 1, 2000 through March 11, 2002. The evaluation period for the Investment Test, the Service Test, and CD loans is March 10, 1997 through March 11, 2002, the period since the prior CRA evaluation.

Conclusions about ENB's lending performance are based on an analysis of a sample of 120 consumer loans (60 secured by a vehicle and 60 that are unsecured) because they are a substantial majority of the bank's business. In addition, the primary credit need of the bank's assessment area is consumer loans. The two major consumer products were loans secured by motor vehicles and loans that are unsecured.

During the evaluation period, the bank originated or purchased 8 HMDA loans totaling \$948,000 and 12 small business loans totaling \$1,912,000. ENB made no small farm loans. Because of the extremely low volume, an analysis of HMDA or small business/small farm loan performance would not be meaningful. Therefore, an analysis of these types of loan data is not included in this evaluation. Moreover, home mortgages are not a credit need on military installations and there are virtually no small business lending opportunities. Four small business loans totaling \$1,615,000 resulted from referrals or purchases from the affiliated Broadway National Bank, San Antonio, Texas.

The Investment Test conclusions are based on an evaluation of qualified community development investments, including qualifying grants and donations. Retail loan products and services, and community development services are evaluated for purposes of rating ENB's performance under the Service Test.

### Data Integrity

We tested all HMDA and small business loan data reported by ENB during the evaluation period. We found no material errors in the collection and reporting of small business and HMDA loan data. As reflected above HMDA and small loans to businesses were not included in the analysis of the bank's performance. Consumer loan data was not collected and maintained since the bank did not elect that this data be considered in its evaluation.

### Selection of Areas for Full-Scope Review

ENB's entire assessment area was selected for a full-scope review. The bank has designated its assessment area as its entire deposit customer base. The Community Reinvestment Act allows this designation for banks whose business predominantly consists of serving the needs of military personnel or their dependents who are not located within a defined geographic area.



## **Ratings**

The overall rating assigned ENB is based on results of the full-scope review of the bank's performance in its entire assessment area. Lending Test ratings are assigned to the bank with emphasis on consumer loans to current and former U.S. military personnel. HMDA and small business/small farm loans are not considered in this evaluation because of the extremely low number of loans and the fact that these products do not represent a credit need in the designated assessment area.

## **Other**

We conducted one community contact during the evaluation with an individual who is designated as the Bank Liaison Officer between the bank and the U.S. military community. Each military installation has such a person. This person identified the primary credit needs as car loans and "signature" (unsecured) loans. Community development opportunities are virtually nonexistent as most needs are provided and controlled by the government.

## Fair Lending Review

Analysis of the most recent public comments, consumer complaint information, HMDA information, and small business loan information was performed according to the OCC's risk-based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed September 30, 1999.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in serving its defined assessment area is good.

#### **Lending Activity**

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity reflects an adequate responsiveness to the primary credit needs of ENB's assessment area. Consumer credit is the most important credit need of military personnel and is weighed most heavily in evaluating the bank's CRA performance.

Since ENB defines its community as all active duty, reserve, and retired military personnel and their dependents throughout the world, and all junior and senior level cadets under contract to serve in the U.S. military, the deposit market rank and market share are not applicable.

#### **Distribution of Loans by Income Level of Geography**

An analysis of the geographic distribution of loans is not meaningful since the bank's community is not defined by geography.

#### **Inside/Outside Ratio**

ENB makes a substantial majority of its loans in its assessment area. Based on the results of reviewing a sample of 120 consumer loans, 85% of the number and 90% of the dollar volume of loans are made to military personnel. There were no small business loans made to military personnel.

#### **Distribution of Loans by Income Level of the Borrower**

The distribution of consumer loans by income level of borrower is good. Consumer loans secured by vehicles and that are unsecured are the primary consumer loan products for ENB.

## **Home Mortgage Loans**

An analysis of HMDA loans is not meaningful because of the low number of originated and purchased loans, and the fact that HMDA loans are not a significant credit need for the assessment area.

## **Small Loans to Businesses**

An analysis of small loans to businesses is not meaningful because of the low number of originated and purchased loans, and the fact that there are very few small business lending opportunities on military installations.

## **Consumer Loans**

Refer to Table 13 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

ENB's distribution of consumer loans is adequate. The percentage of the bank's loans to low-income military personnel exceeds the percentage of military personnel who are considered low-income. However, the percentage of the bank's loans to moderate-income military personnel is significantly lower than the percentage of military personnel who are considered moderate-income. This weaker lending performance to moderate-income military borrowers is somewhat due to the strong competition from credit unions and a multi billion dollar federal savings bank, which also target military customers, and an overall decline in lending volume.

## **Community Development Lending**

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank did report any community development loans during the evaluation period.

## **Product Innovation and Flexibility**

The bank offers two flexible and innovative loan programs for persons about to become officers in the U.S. military. These programs are targeted at junior or senior level ROTC cadets who may have extraordinary expenses associated with the transition from college life to active duty military. These programs are innovative in that they are based on prospective income after graduation at a time when income is very low.

The ROTC Cadet Quick Cash Loan is offered for up to \$4 thousand at a lower interest rate with payments deferred up to 3 months after graduation. The intent is to help with expenses such as those for moving, buying uniforms, and setting up a new residence. In 2000, the bank made 68 loans for \$242 thousand, and in 2001 the bank made 76 loans for \$300 thousand.

The ROTC Cadet Automobile Loan is at a rate of 5.49% up to 60 months with up to 100% financing on new or used vehicles. This loan is available within 3 months of graduation with payments deferred 3 months after graduation. In 2000, the bank made 23 loans for \$451 thousand and in 2001, the bank made 15 loans for \$239 thousand.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in ENB's assessment area is adequate.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank has made 29 donations to several qualifying charitable organizations that primarily serve low- and moderate-income individuals. Specific examples are:

**The Fisher Houses** - This organization is specifically for families of seriously ill or injured patients receiving treatment at military hospitals around the world. Families must have military status, active, reserve or retired and meet income eligibility guidelines. Over 80% of clients are enlisted with a substantial majority of those needing either pediatric care, special care for problem pregnancies, or premature deliveries. Based on income statistics, 55% are considered low- or moderate-income. The bank donated various amounts eight times totaling \$4,800 to this organization from 1997 to 2002.

**United Way of San Antonio and Bexar County** - This organization provides funding to community service organizations that serve the San Antonio and Bexar County Area. The bank made five donations totaling to \$57,000 to this organization between 1997 and 2002. Of the total people served during this timeframe, 59-64% are low-or moderate-income.

**Army Emergency Relief: 9-11 Pentagon Victims Fund** - This organization was set up specifically for victims of the terrorist attack on the Pentagon which occurred on September 11, 2001. The bank donated \$2,000 for this cause in 2001.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

Based on a full scope review of the bank's performance in its assessment area under the Service Test is rated "High Satisfactory". ENB is a "military bank" whose assessment area is designated as its deposit base. Therefore, the assessment area is not geographically defined.

## **Retail Banking Services**

ENB's performance in providing retail banking services is good. ENB's service delivery system allows for easy access to bank products and services by military personnel. ENB has tailored its services to fit the needs of military personnel wherever they live or are stationed. ENB has a main office at Fort Sam Houston, six branches on military bases and one branch just outside a military post. The income designations of the geographies in which branches are located are immaterial in evaluating performance under this test because the assessment is not geographically defined. Furthermore, the income designations for the tracts reflect only residents of these tracts and a community contact stated that about 75% of all permanently assigned military personnel live off-base. This was confirmed by the results of the loan sample, which showed that 89% of the loan customers live off-base.

Alternative delivery systems are good. ENB offers products and services that allow depositors extensive account access. These include TELELINK, a 24-hour/day customer access line via telephone, loan applications by phone, Internet banking, and banking by mail or fax. The bank also offers a toll free number, with which customers may talk to a bank representative during normal business hours. Toll-free numbers are also offered to overseas customers in Japan, Korea, Germany and Italy. There are 21 ATM locations and one accepts deposits. The need for deposit-taking ATM's is limited since all military pay requires direct deposit. Additionally, ENB customers may use any one of the affiliate bank's 22 ATM's at no charge. ATM and debit cards can be used at locations throughout the world.

ENB's full-service Web site allows users access to all bank services. Customers can use internet banking services to access their accounts, receive loan information, apply for loans on-line, and pay bills on-line at a low competitive fee.

Hours of operation and services offered are reasonable. The main office and two branches provide extended lobby hours at month end to facilitate the cash needs associated with the military payday. Extended motor bank services are available at these three locations and on Saturdays. The remaining five branches are open from 9 to 4 or 9 to 5 Monday through Friday to serve the needs of their customers.

## **Community Development Services**

No data was available to determine the effectiveness of the bank's community development services to low- and moderate-income military personnel. Therefore, the services provided to the community did not qualify under the definition of community development services.

## 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 metropolitan and non-metropolitan areas 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (1/1/2000 to 03/19/2002) Investment and Service Tests and CD Loans: (03/10/1997 to 03/19/2002)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Eisenhower National Bank (ENB) Fort Sam Houston, Texas	Consumer Vehicle Loans, Consumer Unsecured Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>[Instructions: Provide only if affiliate products are reviewed.]</i>  None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Entire Bank Deposit Customer Base	Full-Scope	ENB also includes in its assessment area all active duty, reserve and retired US military personnel and their dependents, and junior and senior level ROTC cadets under contract to serve in the military.

# Appendix B: Market Profiles for Full-Scope Areas

---

## Table of Contents

### Market Profiles for Areas Receiving Full-Scope Reviews

<a href="#">Eisenhower National Bank Deposit Base</a> .....	B-2
---	-----



**(ENB Deposit Base)**

Demographic Information for Full-Scope Area: N/A						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	N/A	N/A	N/A	N/A	N/A	N/A
Population by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Owner-Occupied Housing by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Businesses by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Farms by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Family Distribution by Income Level	N/A	N/A	N/A	N/A	N/A	N/A
Distribution of Low- and Moderate-Income Families throughout AA Geographies	N/A	N/A	N/A	N/A	N/A	N/A
2002 U.S. Military Median Income**	35,461					

(\*) Information by geography is not applicable since the bank's AA is not defined by geography.

(\*\*) Source: Defense Finance Accounting Service - Complete Active Duty and Reserve Monthly Drill Pay Tables, Effective January 1, 2002.

Eisenhower National Bank (ENB) defines its AA as its entire customer deposit base, including all active, reserve and retired U.S. military personnel and their dependents, and all junior and senior level college ROTC cadets under contract to serve in the military.

The primary credit needs of ENB's military community are motor vehicle loans and "signature" (unsecured) loans. Military installations generally provide the basic necessities for military personnel, including retail products and services, medical and dental care, and some housing. Roughly 75% of permanently assigned military personnel reside off-base. Those that do live on base also receive a housing allowance. Some receive other allowances depending on their job duties, assignment/geographic location, or other factors.

On-base competition comes mainly from credit unions, as military installations are limited to a maximum of two different type financial institutions. Credit unions, banks and other institutions familiar with the military have proven be strong competition for ENB, especially in the San Antonio, Texas market.

The terrorist events of September 11, 2001 have resulted in a heightened sense of national security, particularly on U.S. military installations. As a result, privatization plans for many military posts have stalled. Some of these plans also provide for renovation and rehabilitation of some installations. Once privatization resumes, renovation/rehabilitation projects will begin and commercial enterprises will be set up on military bases with more frequency, creating possible lending and/or investment opportunities. These opportunities, according to ENB senior management, will be of the multi-million dollar size, when they finally materialize.

## Appendix C: Tables of Performance Data

---

### Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Entire bank

**Tables 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 15 are not applicable. Therefore, they are not included in this section.**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NA				Evaluation Period: January 1, 2000 To March 11, 2002						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
Deposit Base	100.00	8	948	12	1,912	0	0	0	0	20	2,860	100.00
<b>Limited Review:</b>												

\* Loan Data as of March 11, 2002. Rated area refers to either the state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is March 10, 1997 to March 11, 2002.  
 \*\*\* Deposit Data as of December 31, 2001. Rated Area refers to the state, multi-state MA, or the institution, as appropriate.





### Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: NA		Evaluation Period: January 1, 2001 To March 11, 2002	
MA/Assessment Area:	Geographic Distribution										Borrower Distribution											
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers					
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of M.P.***	% of BANK Loans	% of M.P.***	% of BANK Loans	% of M.P.***	% of BANK Loans	% of M.P.***	% of BANK Loans				
<b>Full Review:</b>																						
Deposit Base	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.64	8.33	39.47	15.83	31.38	44.17	21.52	31.67				
<b>Limited Review:</b>																						

\* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.  
 \*\* Percentage of Households (Hhlds) is based on 1990 Census information.  
 \*\*\*Military Personnel. Source: Defense Finance and Accounting Service Complete Active Duty and Reserve Monthly Drill Pay Tables, effective January 1, 2001 and January 1, 2002.





## GEOGRAPHY

Demographic Information for Full Scope Area: GEOGRAPHY						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	NA	NA	NA	NA	NA	NA
Population by Geography	NA	NA	NA	NA	NA	NA
Owner-Occupied Housing by Geography	NA	NA	NA	NA	NA	NA
Business by Geography	NA	NA	NA	NA	NA	NA
Farms by Geography	NA	NA	NA	NA	NA	NA
Family Distribution by Income Level**	NA	NA	NA	NA	NA	NA
Distribution of Low and Moderate Income Families throughout AA Geographies	NA	NA	NA	NA	NA	NA
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below Poverty Level		NA	Median Housing Value Unemployment Rate (1990 US Census)		NA	

(\*) The NA category consists of geographies that have not been assigned an income classification.

(\*) The NA entries indicate the absence geographic designations of the bank's assessment area, which the bank has designated to be its deposit base.