



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**August 11, 2003**

# **Community Reinvestment Act Performance Evaluation**

**Wilber National Bank  
Charter Number: 2151**

**245 Main Street  
Oneonta, NY 13820**

**Office of the Comptroller of the Currency  
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**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 **Wilber National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wilber NB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory			
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 levels that reflect an adequate responsiveness to the credit needs of the assessment area (AA) given the bank's size, resources and level of competition.
- An adequate distribution of loans among geographies of different income levels throughout the AA, along with an excellent ratio of loans originated inside the AA.
- An adequate distribution of loans among borrowers of different income levels throughout the AA.
- Investments that reflect an adequate responsiveness to the credit and community development needs of the AAs.
- Service delivery systems that are readily accessible to geographies and individuals of different income levels in the AA.
- Good performance in providing community development services.

## 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 MSA/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:** such 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

Wilber National Bank, (WNB) is headquartered in Oneonta, New York and is a wholly owned subsidiary of The Wilber Corporation, a one-bank financial holding company. The Wilber Corporation had total average assets of \$720 million as of March 31, 2003. WNB has three operating subsidiaries; Wilber REIT, Inc and Western Catskill Realty LLC which are both real estate related organizations and Mang-Wilber LLC, which is an insurance agency. None of these operating subsidiaries impact WNB's ability to meet the credit needs of its AAs.

WNB is a full service intrastate bank with 18 branches serving five counties in the Western Catskill Region of New York State. WNB acquired one branch from a competing community bank during the evaluation period. WNB offers a wide range of financial services, including loans to consumers, commercial and residential mortgages and commercial and industrial loans. In addition to traditional deposit and loan products, WNB offers its customers insurance products and trust services.

As of March 31, 2003, WNB had \$719 million in total average assets that included \$357 million in net loans, representing 50% of total assets. The bank's loan mix consists of 65% real estate loans, (53% residential real estate, 45% commercial real estate, 1% multifamily and 1% agricultural), 17% loans to individuals, 16% commercial and industrial loans, 1% multifamily and 1% agricultural. Since March 31, 2002 total assets increased 7.04% due primarily to an increase in gross loans of 7.73% with commercial loans increasing 16.67% and an increase in investments of 6.02%. As of March 31, 2003, WNB reported Tier 1 capital of \$55 million.

WNB operates in a competitive financial services market. The competition includes mortgage companies, large regional and community banks and a large local credit union. WNB is not subject to any known financial, legal or regulatory restrictions that would impede its ability to help meet the credit needs of its AA.

WNB's last CRA exam was July 18, 2000, at which time the bank's performance was rated "Satisfactory."

# Scope of the Evaluation

## Evaluation Period/Products Evaluated

The evaluation period covered January 1, 2000, through December 31, 2002, for Home Mortgage Disclosure Act (HMDA), small business and small farm loans. HMDA loans include home purchase, home improvement and refinance loans. The evaluation period for Community Development (CD) loans, investments, and services is July 18, 2000, through August 11, 2003. This represents the time period between the start of the bank's last and current CRA exams. The market share and peer comparisons are based on the information contained in the aggregate HMDA and Small Business/Farm Registers for 2001, the 2002 was not available at the time of this examination. The aggregate HMDA and Small Business/Farm Reports are available for public review.

The peer comparisons in this report include only lenders who were required to file HMDA and Small Business/Farm Reports for 2001. Any lender with significant mortgage loan activity operating in WNB's two AAs would be required to file a HMDA report for 2001. Small business reporting is required only of bank and thrift institutions with assets of \$250 million or more as of December 31 of the prior two calendar years preceding the reporting year, or an affiliate of a holding company with \$1 billion or more in assets for the same time period.

For the lending test, we evaluated WNB's origination of home mortgage loans, small business and small farm loans.

## Data Integrity

We performed a data integrity exam of the loan information indicated above. We chose samples with 95% reliability and 5% precision, which resulted in random samples of 60 HMDA loans and 60 small business/small farm loans. We found the bank's HMDA loan data, small business and small farm loan data to be of good quality.

## Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's Non-MSA AA, which consists of Chenango, Delaware, Otsego and a portion of Ulster County. We completed a limited scope review of the bank's MSA-AA, which consists of Schoharie County. We chose the Non-MSA AA for a full-scope review because it is the area with the highest percentage of the bank's lending. This AA represented 96% of WNB's lending for the evaluation period. The AA also comprised 92% of WNB's deposits and 94% of its branches. Please refer to Appendix A later in the report for more information.

## Ratings

The bank's overall rating is based primarily on the area that received a full-scope review. This weighting is reflective of WNB's volume by loan type over the evaluation period. When determining conclusions for the Lending Test, home mortgage products and small loans to businesses were weighted equally as the volume of loans was nearly the same. Small loans to farms were given less weight as the low volume was considered in the analysis. Within the



home mortgage product category, the volume of home refinance loans and home improvement loans was nearly equal therefore they were weighted equally. Home purchase loans were given less weight. Multifamily loans were not considered under the Lending Test as the bank made only seven multifamily loans in the AA during the evaluation period. WNB's overall ratings under each test is the consolidation of conclusions reached for the full-scope AA, along with consideration of any impact on performance by the limited scope AA.

## **Other**

Two community contacts were made in conjunction with this review. The contacts consisted of an economic development organization involved primarily with small business development and financing and a community action agency involved in affordable housing advocacy and the provision of services for low and moderate-income individuals. The contacts stated that the credit needs of the area included small dollar loans for small business financing for start up and expansion activity. The need for small business related credit, investments and services were considered in our evaluation of WNB's performance under the Lending, Investment and Service Tests. Refer to the Market Profile in Appendix B of this Evaluation for more information.

## **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

# 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 the full-scope review, the bank's performance in the Non-MSA AA is adequate.

### Lending Activity

Refer to Tables 1 and 2 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank had an equal amount of home mortgage loans and small loans to businesses, each representing 48% of the loans originated during the evaluation. Small loans to farms represented the remaining 4%. Among originated home mortgage loans, 38% were for home improvement, 38% were home mortgage refinance loans and 24% were for home purchase loans.

WNB's overall lending activity in the AA is adequate given the bank's size, resources and level of competition. WNB ranks second for deposits with a 12.44% market share. Based on 2001 aggregate HMDA data, WNB is the number one originator/purchaser of home improvement (19.83%) loans. It ranked fourth in refinance loans with a 5.16% market share and eighth in home purchase loans with a 3.89% market share. Based on 2001 CRA aggregate data, WNB is the second originator/purchaser of small loans to farms (7.08%) and eighth originator/purchaser of small loans to businesses with a 5.39% market share.

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

The borrower distribution of WNB's home mortgage, small loans to businesses and small loans to farms reflect an adequate dispersion among borrowers of different income levels throughout the AA. In the evaluation of borrower distribution, we gave consideration to the high poverty level in the AA. The poverty level in the Non-MSA AA is 11.32%. Due to reasons of affordability, it is unlikely that those with incomes below the poverty level would be involved in home mortgage financing. Accordingly, we considered this in evaluating the bank's lending distribution to low-income borrowers.

### *Home Mortgage Loans*

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans is good.

Home purchase loan borrower distribution is good. The portion of home purchase loans to low-income borrowers is below the portion of low-income families but is good when considering the 11.32% households living below the poverty level. The portion of home purchase loans to moderate-income borrowers is below the portion of families defined as such. The market share for loans made to low-income borrowers and to moderate-income borrowers exceeds WNB's overall market share in the AA for home purchase loans.

Home improvement loan borrower distribution is excellent. The portion of home improvement loans to low-income borrowers is below the portion of low-income families, but is excellent when considering the 11.32% households living below the poverty level. The portion of home improvement loans to moderate-income borrowers well exceeds the portion of families defined as such in the AA. The market share for loans made to both low and moderate-income borrowers exceeds WNB's overall market share in the AA for home improvement loans.

Refinance loan borrower distribution is good. The portion of refinance loans to low-income borrowers is below the portion of low-income families, but is excellent when considering the 11.32% households living below the poverty level. The portion of refinance loans to moderate-income borrowers is below to the portion of families defined as such. The market share for loans made to both low and moderate-income borrowers exceeds WNB's overall market share in the AA for refinance loans.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate. The portion of WNB loans to small businesses (businesses with revenues of \$1 million or less) is less than the portion of businesses that are defined as such in the AA. The portion of loans of \$100,000 or less exceeds the portion of small businesses in the AA. Revenue information was not reported for 37.26% of the loans to businesses, therefore they could not be classified. The market share of small loans to small businesses well exceeds WNB's overall market share for small loans to all businesses in the AA.

### ***Small Loans to Farms***

Refer to Table 12 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The borrower distribution of small loans to farms is adequate. The portion of WNB loans to small farms (farms with revenues of \$1 million or less) is less than the portion of farms that are defined as such in the AA. The portion of loans of \$100,000 or less substantially meets the portion of small farms in the AA. Revenue information was not reported for 36.25% of the loans to farms, therefore they could not be classified. The market share of small loans to small farms is below WNB's overall market share for small loans to all farms in the AA.

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

The geographic distribution of WNB's home mortgage loans, and small loans to businesses reflects adequate distribution throughout the AA when considering the change in the AA during the evaluation period. WNB changed its AA at the end of 2001 with its expansion into the County of Chenango. This resulted in the doubling of the number of moderate-income geographies from two to four, however the bank was only actively lending in this area as part of their AA for one year of the three-year evaluation period. The expansion into Chenango County significantly changed the demographics of the AA in moderate-income geographies. The fact that the bank only entered into the new market for one year of the evaluation period was considered when analyzing the bank's performance under geographic distribution. A geographic analysis of small loans to farms was not conducted as there were only two farms located within moderate-income geographies for two years of the three-year evaluation period making any analysis insignificant. There are no low-income geographies in the Non-MSA AA.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is poor.

The geographic distribution of home purchase loans is poor. The portion of home purchase loans made in moderate-income geographies is well below the portion of owner-occupied housing units that are in those geographies even when considering the percentage of owner-occupied housing units in moderate-income geographies was 1.49% for two years of the three-year evaluation period. The market share of loans originated in moderate-income geographies is below the bank's overall market share.

The geographic distribution of home improvement loans is adequate. The portion of home improvement loans made in moderate-income geographies is below the portion of owner-occupied housing units that are in those geographies, when considering the percentage of owner-occupied housing units in moderate-income geographies was 1.49% for two years of the three-year evaluation period. The market share of loans originated in moderate-income geographies is substantially less than the bank's overall market share of home improvement loans.

The geographic distribution of refinance loans is poor. The portion of refinance loans made in moderate-income geographies is well below the portion of owner-occupied housing units that are in those geographies even when considering the percentage of owner-occupied housing units in moderate-income geographies was 1.49% for two years of the three-year evaluation period. WNB made only two home refinance loans in moderate-income geographies within the AA during the evaluation period. The market share of loans originated in moderate-income geographies is substantially below the bank's overall market share.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The portion of small loans to businesses made in moderate-income geographies is near to the portion of businesses that are in those geographies when considering the percentage of businesses in moderate-income geographies was 1.92% for two years of the three-year evaluation period. The market share of small loans to businesses made in moderate-income geographies is near to the bank's overall market share.

## **Lending Gap Analysis**

Reports detailing WNB's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

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

A substantial majority (93%) of the home mortgage, small business and small farm loans were made within the bank's AAs. By product, 96% of the bank's home mortgage loans, 89% of the small loans to businesses and 94% of the small loans to farms were within the bank's AAs. The home mortgage products were each close to the 96% overall in/out ratio with home purchase at 94%, home improvement at 98%, and refinances at 97%. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

## **Community Development Lending**

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

WNB's level of community development lending had a neutral impact on the evaluation of its lending performance activity. WNB originated one CD loan for \$250 thousand in its AA. The loan was to a Child Development Agency for the purpose of implementing a child-care service program primarily for low and moderate-income families. The bank's CD activities were responsive to the credit needs of the AA.

## **Product Innovation and Flexibility**

WNB's innovative and flexible lending activity had a neutral impact on the evaluation of its lending performance. Flexible lending programs are described below.

City of Oneonta Downtown Revolving Loan Fund - WNB is involved in this special loan program along with the City of Oneonta. The bank provides one dollar of financing at the prevailing interest rate for every two dollars provided by the city fund. The bank has committed a total of \$300,000 to this program. Businesses must meet the bank's standards for credit history and collateral. WNB will finance up to 90% of a project associated with this program, as opposed to its usual 70%, and work with businesses to arrange additional financing through the SBA and other programs if necessary. An applicant must have a minimum 10% owner equity in a project. Loan proceeds are used to maintain or create jobs for low- and moderate-income individuals. WNB made 23 loans for \$392 thousand during the evaluation period.

Otsego County Wheels to Work Program - The program, which is sponsored cooperatively by Opportunities for Otsego, the Department of Labor and local SUNY institutions, is designed to aid low and moderate-income individuals whose barrier to employment is reliable transportation. Opportunities for Otsego purchases older model automobiles with funding from the Department of Labor. The Auto Tech students at SUNY make any required repairs. The goal is to help individuals maintain or gain employment by providing them with affordable and reliable vehicles. WNB provides these secured installment loans to individuals who would not otherwise qualify for credit, and at interest rates below the conventional rate. WNB made 57 loans for \$29 thousand during the evaluation period.

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

Based on the limited-scope review, the bank's performance under the lending test in the MSA AA is stronger than the bank's overall performance under the lending test. The stronger performance is attributable to excellent geographic distribution and good borrower distribution. The stronger performance did not impact the overall rating due to the low volume of lending in the limited-scope AA. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated "Low Satisfactory."

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

The bank's performance under the Non-MSA AA is adequate in relation to the bank's size and resources and the level of and competition for community development opportunities in the AA. Community development investment opportunities in the Non-MSA AA remain limited.

During the evaluation period, WNB invested \$497 thousand in a Small Business Investment Corporation (SBIC) with an additional \$414 thousand as yet an unfunded commitment. The investment in the SBIC has been allocated based upon the prorata share of deposits in each AA.

During the evaluation period, WNB also made 22 qualifying grants and donations totaling \$28 thousand in the Fulton County AA. The grants were spread among eight organizations, all of which provide assistance and community services targeted to low and moderate-income individuals.

During the evaluation period the bank also invested \$1 million in a CRA Qualified Investment Fund, however the bank removed the funds after one month. Bank management became aware that two principals of the fund were being pursued by the SEC for their activity at a prior fund and felt it prudent to withdraw the funds. Due to the short period of time little consideration was given to this investment during this evaluation. The bank has recently engaged a securities corporation in an attempt to secure and package CRA qualified home mortgage loans within their AA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on the limited-scope review, the bank's performance under the Investment test in the MSA AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "Outstanding." Based on the full-scope review, the bank's performance in the Non-MSA AA is excellent.

#### **Retail Banking Services**

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

WNB's delivery systems are readily accessible to geographies and individuals of different income levels throughout the Non-MSA AA. The distribution of branches throughout the AA is excellent.

The distribution of WNB's offices throughout the moderate-income geographies exceeds the distribution of the population living in such geographies. One branch was opened and one additional branch was acquired through the bank's acquisition activity discussed earlier. The opening occurred in a middle-income geography while the acquired branch is in a moderate-income geography. WNB's hours and services offered throughout the AAs are good. Services offered are the same among locations regardless of the income level of the geography. All branch offices offer extended hours on various days of the week including Saturday with one branch offering Sunday hours.

WNB offers alternative delivery systems in the form of ATMs. The geographic distribution of the bank's ATMs is similar to its distribution of its branches. Customers and non-customers alike can access their accounts through WNB ATMs, which are connected to the NYCE, PLUS, Exchange, tx and Quest ATM systems. Customers may also use their WNB ATM card to obtain cash at non-proprietary ATMs throughout the world, which bear these logos. WNB also offers alternative delivery systems in the form of bank-by-phone and Internet banking. These services allow customers to obtain deposit and loan account information, transfer funds and reconcile their account. We did not place significant weight on these alternative delivery systems because no data was available to determine the impact of these retail-banking services on low and moderate-income geographies and individuals.

#### **Community Development Services**

WNB's performance in providing community development services is good.

Management and bank employees support various organizations in the communities served by the bank. Bank personnel are members of the boards of directors or finance committees of organizations that provide community development services.

WNB employees provide a good level of support to various community development service organizations. Members of the WNB staff and Board participate in nine various community service organizations. These organizations are very responsive to the credit and service needs of the community.



During the evaluation period a senior officer of the bank continued membership on the loan committee of a Statewide Business Development Corporation. The loan fund provides low interest loans to businesses that have difficulty obtaining bank loans for business start-up or expansion. A substantial majority of the businesses receiving loans are small businesses, which will create, improve or retain jobs for low and moderate-income individuals.

In the Non-MSA AA, members of the WNB staff and Board currently participate in five organizations that promote economic development by providing affordable financing for small sized businesses and farms that employ low and moderate-income individuals and support permanent job creation, retention, and improvement in moderate-income geographies and three organizations that are committed to providing affordable housing to low and moderate-income individuals.

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

Based on the limited-scope review, the bank's performance under the Service Test in the MSA AA is weaker than the bank's overall performance under the Service Test. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

The weaker performance in the MSA AA is due to the accessibility of WNB's offices in the AA. The portion of WNB's offices in moderate-income geographies is less than the portion of the population living in such geographies. This weaker performance in the AA did not negatively impact the conclusion for the Service Test as the bank has only one branch in the AA.

## Appendix A: Scope of Examination

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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): (01/01/00 to 12/31/02) Investment and Service Tests and CD Loans: (07/18/00 to 08/11/03)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Wilber National Bank (WNB) Oneonta, New York	Home mortgage loans, loans to small businesses, loans to small farms and CD loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>None</i>		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Wilber Non-MSA AA Wilber MSA AA #0160	Full-Scope Limited-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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## Table of Contents

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

Non-MSA AA .....	B-2
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## Non-MSA AA

Demographic Information for Full-Scope Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	54	0.00	7.41	77.78	14.81	0.00
Population by Geography	205,832	0.00	5.21	81.62	13.17	0.00
Owner-Occupied Housing by Geography	56,834	0.00	4.04	83.51	12.45	0.00
Businesses by Geography	11,436	0.00	5.27	80.76	13.96	0.00
Farms by Geography	843	0.00	6.29	88.85	4.86	0.00
Family Distribution by Income Level	53,923	17.50	19.44	23.34	39.72	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,921	0.00	6.11	87.62	6.27	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$31,472 = \$43,600 = 11.32%	Median Housing Value Unemployment Rate		= \$76,045 = 4.29%*		

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

Source: 1990 U.S. Census, and 2002 HUD updated MFI. \* New York State Department of Labor, Division of Research and Statistics July 2003.

## Non-MSA AA

The Non-MSA AA consists of the entire Counties of Chenango, Delaware and Otsego and the northwestern most geographies of Ulster County. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The composition of the AA geographies by income level is: 0% low-income, 7% moderate-income, 78% middle-income and 15% upper-income.

The level of competition among financial service providers in the AA is relatively high. WNB competes with large mortgage companies, large interstate regional banking companies, and various community banks and large credit unions. According to the FDIC market share report as of June 30, 2002, WNB is ranked second for market share of deposits in the AA at 12.44%. WNB is a full service lender offering a broad menu of lending products that include business loans, home mortgage loans, home equity loans, and consumer loans. WNB offers a wide range of financial services, in addition to traditional deposit and loan products, WNB offers its customers insurance products and trust services.

Eighty percent of the housing in the AA is one to four family units, 5% is multifamily units and 15% is mobile homes. Of total housing units, 57% is owner-occupied, 21% is renter-occupied, and 22% is vacant. The median housing value was \$76,045 in the 1990 census. Housing stock consists mostly of older homes with the median year built of 1952.

According to the 2002 business demographics there are 12,279 businesses, of which 843 are farms in the AA. Small businesses represent 76% of the businesses. Approximately 74% of businesses reported having less than 10 employees. The primary industries in the AA are services 34% and retail trade 19%. Major employers in the AA include the State University of New York, Bassett Hospital and the local school districts.

Based on OCC internal resources, community contacts and public information, the AA has limited opportunities available for community development lending, services and investments.

## Appendix C: Tables of Performance Data

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### 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 MSA/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 MSA/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 MSA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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 MSA/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 MSA/assessment area.

**Table 14. Qualified Investments -** Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 MSA/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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.



Institution ID: 1000002151 WILBER NATIONAL BANK

Table 1. Lending Volume

LENDING VOLUME												
Geography: WILBER NB												
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002												
MSA/Assessment Area (2002):	% of Rated Area Loans (#) in MSA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MSA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Non-MSA AA	95.59	1,098	47,012	1,097	47,272	80	1,902	1	250	2,276	96,436	92.00
<b>Limited Review:</b>												
MSA AA	4.41	64	3,808	41	1,776	0	0	0	0	105	5,584	8.00

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.  
<sup>\*\*</sup> The evaluation period for Community Development Loans is From July 18, 2000 to August 11, 2003.  
<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: WILBER NB				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MSA AA	262	94.93	0.00	0.00	4.04	0.00	83.51	98.47	12.45	1.53	3.89	0.00	0.00	4.85	0.52
<b>Limited Review:</b>															
MSA AA	14	5.07	0.00	0.00	67.24	92.86	32.76	7.14	0.00	0.00	1.41	0.00	2.26	0.00	0.00

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Northeast Region.

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: WILBER NB				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Non-MSA AA	416	96.52	0.00	0.00	4.04	0.96	83.51	97.60	12.45	1.44	19.83	0.00	3.03	23.33	3.41
<b>Limited Review:</b>															
MSA AA	15	3.48	0.00	0.00	67.24	73.33	32.76	26.67	0.00	0.00	1.00	0.00	1.75	0.00	0.00

\* Based on 2001 Peer Mortgage Data: Northeast Region.

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WILBER NB					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non-MSA AA	413	92.39	0.00	0.00	4.04	0.48	83.51	98.06	12.45	1.45	5.16	0.00	0.00	6.33	0.70	
<b>Limited Review:</b>																
MSA AA	34	7.61	0.00	0.00	67.24	70.59	32.76	29.41	0.00	0.00	2.76	0.00	3.09	2.22	0.00	

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Northeast Region.

<sup>\*\*</sup> Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WILBER NB					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
MSA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Non-MSA AA	1,097	96.40	0.00	0.00	5.27	2.10	80.76	96.08	13.96	1.82	5.39	0.00	4.66	9.52	0.36	
<b>Limited Review:</b>																
MSA AA	41	3.60	0.00	0.00	50.90	42.50	49.10	57.50	0.00	0.00	3.37	0.00	3.13	4.70	0.00	

<sup>\*</sup> Based on 2001 Peer Small Business Data: US&PR.

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2002).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: WILBER NB					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Non-MSA AA	262	94.93	17.50	5.22	19.44	14.86	23.34	25.30	39.72	54.62	4.15	5.49	4.88	3.74	4.01	
<b>Limited Review:</b>																
MSA AA	14	5.07	26.96	7.14	25.58	57.14	24.50	28.57	22.96	7.14	1.65	0.00	3.53	2.11	0.00	

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Northeast Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 4.71% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WILBER NB					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Non-MSA AA	416	96.52	17.50	13.92	19.44	28.10	23.34	26.84	39.72	31.14	19.47	22.22	24.62	18.71	16.96	
<b>Limited Review:</b>																
MSA AA	15	3.48	26.96	14.29	25.58	28.57	24.50	35.71	22.96	21.43	1.00	0.00	0.00	2.63	0.00	

<sup>\*</sup> Based on 2001 Peer Mortgage Data: Northeast Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 5.10% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: WILBER NB		Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>										
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Non-MSA AA	413	92.39	17.50	9.14	19.44	15.67	23.34	27.42	39.72	47.78	5.70	11.11	6.01	5.24	5.41						
<b>Limited Review:</b>																					
MSA AA	34	7.61	26.96	3.13	25.58	25.00	24.50	28.13	22.96	43.75	2.99	0.00	1.68	2.61	5.51						

<sup>†</sup> Based on 2001 Peer Mortgage Data: Northeast Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 7.16% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.



**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WILBER NB			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MSA AA	1,097	96.40	74.72	50.87	90.70	5.74	3.56	5.39	6.51
<b>Limited Review:</b>									
MSA AA	41	3.60	76.38	46.34	87.80	4.88	7.32	3.37	5.44

<sup>\*</sup> Based on 2001 Peer Small Business Data: US&PR.

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 37.26% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WILBER NB			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MSA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MSA AA	80	100.00	95.73	62.50	95.00	5.00	0.00	7.08	4.47
<b>Limited Review:</b>									
MSA AA	0	0.00	94.23	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2001 Peer Small Business Data: US&PR.

<sup>\*\*</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 36.25% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: WILBER NB									
Evaluation Period: JULY 18, 2000 TO AUGUST 11, 2003									
MSA/Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non-MSA AA	1	117	30	495	31	612	93.29	1	414
<b>Limited Review:</b>									
MSA AA	1	14	1	30	2	44	6.71	0	0

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

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

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: WILBER NB				Evaluation Period: JULY 18, 2000 TO AUGUST 11, 2003									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Non-MSA AA	92.00	17	94.00	0.00	11.76	88.24	0.00	1	0	0	0	1	0	0.00	5.21	81.62	13.17
<b>Limited Review:</b>																	
MSA AA	8.00	1	6.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	60.01	34.64	0.00