



Comptroller of the Currency
Administrator of National Banks

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**Bank of Oklahoma, N. A.
Charter Number: 13679**

**Bank of Oklahoma Tower
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NOTE: This evaluation is not, nor should it 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **Bank of Oklahoma, N. A. (BOK)** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **October 22, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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 safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSA's consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Census Tract (CT) - Small, locally defined statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Home Mortgage Disclosure Act (HMDA) - A statute that requires certain mortgage lenders that do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and its disposition (e.g., approved, denied, withdrawn).

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of census tracts. 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.

Low-Income - Income levels that are less than 50% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Upper-Income - Income levels that are 120% or more of the MFI.

Small Business Loans - Loans with an original amount of \$1 million or less for which the bank is required to collect and report certain monitoring data under the CRA regulation.

Small Farm Loans - Loans with an original amount of \$500 thousand or less for which the bank is required to collect and report certain monitoring data under the CRA regulation.

CRA Rating

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

The major factors which support this rating include:

- ▶ A good responsiveness to the credit needs of BOK's assessment areas.
- ▶ The good distribution of loans throughout BOK's assessment areas and to borrowers of all income levels and businesses of all sizes.
- ▶ An adequate level of community development lending and investment.
- ▶ The accessibility of BOK's services through branch/ATM locations and telephone/computer banking services; and,
- ▶ A relatively high level of community development services.

The following table indicates the performance level of **Bank of Oklahoma, N. A.** with respect to the lending, investment, and service tests:

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

* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Description of Institution

Bank of Oklahoma, N.A. (BOK), headquartered in Tulsa, Oklahoma, is the largest bank in the state of Oklahoma and the only locally-owned, multi-billion dollar bank in the state. As of May 31, 1997, BOK reported total assets of \$4.7 billion and a loan-to-deposit ratio of 68%. BOK is a wholly-owned subsidiary of BOK Financial Corporation (BOKF), a multi-bank holding company also headquartered in Tulsa. BOKF owns banks in Arkansas (Bank of Arkansas, N.A.) and Texas (First National Bank of Park Cities and First Texas Bank). BOK's wholly-owned mortgage affiliate, BancOklahoma Mortgage Corp, and its affiliate, Citizens Mortgage Group, Inc., were merged into BOK as of January 1, 1997.

BOK's operations are centered in Tulsa and Oklahoma City but its assessment areas encompass a broader area of northeastern and central Oklahoma. In addition to the main office, BOK serves these assessment areas with 58 full-service branch offices and over 200 automated teller machines (ATMs). The bank also operates 12 Loan Production Offices (LPOs) for residential mortgage loan originations. Four of the LPOs are outside of BOK's assessment areas with three of those located in the affiliated Bank of Arkansas' assessment area. BOK maintains slightly more than sixteen percent of the commercial bank deposits within its defined assessment areas.

There are no financial impediments that limit BOK's ability to help meet the credit needs of its assessment areas. However, state laws impose significant limitations on additional branching and acquisitions are limited by a state deposit cap.

The bank offers a full range of commercial, real estate and consumer loan products and retail and commercial deposit products within its assessment areas. Credit card, student and mortgage loan products are offered throughout the state of Oklahoma. As of May 31, 1997, the loan portfolio represented approximately 51% of total assets with commercial loans accounting for 72% of the loan portfolio. Consumer and residential real estate loans accounted for 15% and 13% of the loan portfolio, respectively. BOK is not a major agricultural lender with agricultural loans accounting for approximately 5% of the loan portfolio during this evaluation period.

BOK has identified six assessment areas within the state of Oklahoma that were used in our evaluation of the bank's CRA performance. The assessment areas are the Tulsa MSA, Oklahoma City MSA, Enid MSA, Northeastern Oklahoma (NEO) Region (six counties), Muskogee Region (three counties) and Kay County Region (one county). Although these assessment areas include only 22 of the 153 counties in the state of Oklahoma, over 65% of the state's population lives in the bank's assessment areas. The Tulsa MSA assessment area accounts for 59% of BOK's total deposits, followed by the Oklahoma City MSA with 24%, the NEO Region with 8%, the Muskogee Region with 6%, the Enid MSA with 2% and the Kay County Region with only 1%. Refer to the "Metropolitan Statistical Areas" and "Nonmetropolitan Statewide Areas" sections of this Performance Evaluation for additional information on the bank's assessment areas. In addition, demographic data for all assessment areas can be found in Table 1 in **Appendix B**.

BOK's CRA performance was last evaluated as of February 9, 1995. At that time the bank's overall level of performance was rated "satisfactory".

Conclusions with Respect to Performance Tests

LENDING TEST

In assessing lending performance, we focused on BOK's lending activity; assessment area concentration; geographic distribution of loans; borrower profile; responsiveness to credit needs of economically disadvantaged geographies, low-income persons or small businesses; community development lending; and, product flexibility. Unless otherwise noted, year-to-date (YTD) 1997 loan data presented in this report is data through May 31, 1997. Also, loan originations include loans purchased.

Conclusions:

- ▶ BOK's lending level reflects a good responsiveness to assessment area credit needs.
- ▶ A high percentage of loans are made within BOK's assessment areas.
- ▶ The distribution of loans reflects good penetration throughout assessment area geographies, to borrowers of all income levels and to businesses of all sizes.
- ▶ BOK exhibits a good record of serving the credit needs of low-income borrowers and very small businesses, consistent with safe and sound banking practices.
- ▶ BOK's community development lending levels are adequate.

In addition to the HMDA and small business and farm loan data large banks are required to collect and report to the regulatory agencies, BOK collected and provided data on consumer loans made in 1996 and year-to-date (YTD) 1997. We verified the accuracy of all of this data through the review of limited samples. We determined that the data was suitable for analyzing the bank's lending performance under the CRA. Refer to **Appendix A** for additional information on the scope of the evaluation.

Lending Activity

Lending levels reflect a good responsiveness to credit needs in BOK's assessment areas. The loan-to-deposit ratio has been relatively stable during this evaluation period averaging around 70%. This average is comparable to other similarly situated banks in Tulsa and Oklahoma City.

The loan-to-deposit ratio does not fully capture BOK's lending activity because of the substantial amount of home mortgage loans originated and sold into the secondary market. BOK, with BancOklahoma Mortgage, is the number one home mortgage lender in its assessment areas. During this evaluation period, BOK and BancOklahoma Mortgage originated or purchased 9,961 mortgage loans in BOK's assessment areas totaling \$786 million. Comparable HMDA market data from 1995 (the most current available) reflects that BOK's market share was over twice its nearest competitor, a nation-wide mortgage company.

The bank's small business and farm lending levels are good based upon total loan portfolios reported by similarly situated banks. Banks only began reporting originations of small business and farm loans, by census tract, on March 1, 1997. The regulatory agencies had not compiled and released any market data on this lending activity at the time of this review, so no comparison on origination activity was possible. BOK originated over 22 hundred small business and farm loans during this evaluation period aggregating almost \$240 million.

Banks are not required to collect and report data on consumer loan activity. Therefore, no market comparison is possible. Information on total loan portfolios reported by similarly situated banks reflects that BOK's portfolio of loans to individuals (other than loans secured by real estate) averages between 60% and 70% of these banks. BOK is a significant retail lender with almost 40 thousand consumer loans originated during the evaluation period aggregating \$322 million.

Assessment Area Concentration

Small Business and Farm Loans

BOK originated 2,233 small business and small farm loans totaling approximately \$239 million in 1996 and YTD 1997. The level of loans made reflects a good responsiveness to credit needs in the assessment areas. A substantial majority of these loans, both in number and dollar levels, were made within BOK's assessment areas. The following table illustrates the volume of originations and their location relative to the assessment areas by loan product:

Volume of Small Business and Small Farm Loan Originations in 1996 and YTD 1997 Within All Assessment Areas						
Loan Product	Total Originations		Within the Assessment Area			
	#	\$ (000)	#	%	\$ (000)	%
Small Business	1,424	\$164,862	1,339	94%	\$150,069	91%
Small Farm	90	\$1,918	75	83%	\$1,484	77%
Total 1996	1,514	\$166,780	1,414	93%	\$151,553	91%
Small Business	682	\$71,210	623	91%	\$61,646	87%
Small Farm	37	\$815	29	78%	\$745	91%
Total YTD 1997	719	\$72,025	652	91%	\$62,391	87%
Grand Total	2,233	\$238,805	2,066	93%	\$213,944	90%

Source: Bank prepared Small Business and Small Farm Data Collection Registers

Home Mortgage Loans

BOK originated 2,565 home mortgage loans (including home improvement loans) totaling approximately \$163 million in 1995 and 1996. For the first five months of 1997, after BOK's mortgage affiliates were merged into the bank, BOK originated 3,612 loans totaling approximately \$316 million. The level of total originations reflects good responsiveness to assessment area credit needs. The decrease in originations between 1995 and 1996 is primarily due to the fact that the bank ceased buying for its own portfolio adjustable rate mortgages originated by its mortgage affiliate.

A substantial majority of the loans originated in 1995 and 1996, in terms of both numbers and dollars, were made within BOK's assessment areas. The decline in 1997 is attributed to loans originated or purchased by the mortgage department. The mortgage department serves a broader market than BOK, including that of the Arkansas affiliate. The lower percentage within BOK's assessment areas is not a concern as it does not represent a lesser emphasis in meeting the mortgage credit needs in these assessment areas. Further, since the vast majority of the mortgage department's loans are sold into the secondary market, these loans do not tie up a commensurate level of loan funds. The following table illustrates the volume of originations and their location relative to the assessment areas:

Volume of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within All Assessment Areas						
Product	Total Originations		Within the Assessment Area			
	#	\$ (000)	#	%	\$ (000)	%
Home Purchase/Refinance	962	\$76,581	826	86%	\$58,827	77%
Home Improvement	525	\$6,794	519	99%	\$6,699	99%
Multifamily	14	\$35,119	12	86%	\$28,959	82%
Total 1995	1,501	\$118,494	1,357	90%	\$94,485	80%
Home Purchase/Refinance	400	\$18,682	391	98%	\$18,157	97%
Home Improvement	647	\$8,815	624	96%	\$8,564	97%
Multifamily	17	\$16,561	16	94%	\$11,561	70%
Total 1996	1,064	\$44,058	1,031	97%	\$38,282	87%
Home Purchase/Refinance	3,209	\$297,657	1,427	44%	\$117,050	39%
Home Improvement	394	\$6,496	311	79%	\$5,133	79%
Multifamily	9	\$12,191	6	67%	\$10,555	87%
Total YTD 1997	3,612	\$316,344	1,744	48%	\$132,738	42%
Grand Total	6,177	\$478,896	4,132	67%	\$265,505	55%

Source: HMDA Loan Application Registers

Consumer Loans

BOK originated almost 40 thousand consumer loans totaling over \$320 million in 1996 and YTD 1997. The level of total originations reflects excellent responsiveness to assessment area credit needs. Overall, a high percentage of loans, in both number and dollar volume, were made within BOK's assessment areas. In 1996, the bank participated in a loan referral program with State Farm Insurance offices located throughout the state of Oklahoma to provide motor vehicle loans. The effects of this program are evident in the higher volume of motor vehicle loans in 1996 and the lower percentage within the bank's assessment areas. The bank is also the largest student loan lender in the state of Oklahoma and markets these loans throughout the state. These loans represent a substantial portion of the other unsecured loans reported in 1996 and have likewise resulted in a lower percentage of these loans being within the bank's assessment areas. (Because of the timing of this performance evaluation, few student loans are reflected in the YTD 1997 numbers.) The following table illustrates the volume of originations and their location relative to the assessment areas:

Volume of Consumer Loan Originations in 1996 and YTD 1997 Within All Assessment Areas						
Product	Total Originations		Within the Assessment Area			
	#	\$ (000)	#	%	\$ (000)	%
Motor Vehicle Loans	7,126	\$75,333	4,448	62%	\$46,770	62%
Credit Card Loans	861	\$3,044	598	69%	\$2,202	72%
Home Equity Loans	578	\$32,175	445	77%	\$23,028	72%
Other Secured Loans	2,809	\$39,453	2,095	75%	\$28,496	72%
Other Unsecured Loans	22,959	\$90,228	15,241	66%	\$61,641	68%
Total 1996	34,333	\$240,233	22,827	66%	\$162,137	67%
Motor Vehicle Loans	1,680	\$17,196	1,262	75%	\$12,783	74%
Credit Card Loans	297	\$1,480	231	78%	\$1,202	81%
Home Equity Loans	683	\$30,263	555	81%	\$23,375	77%
Other Secured Loans	980	\$14,249	735	75%	\$10,179	71%
Other Unsecured Loans	1,848	\$18,545	1,516	82%	\$15,342	83%
Total YTD 1997	5,488	\$81,733	4,299	78%	\$62,881	77%
Grand Total	39,821	\$321,966	27,126	68%	\$225,018	70%

Source: Bank prepared Consumer Loan Data Collection Register

Geographic Distribution of Loans within the Assessment Area

Small Business and Farm Loans

Banks began reporting detailed information on small business and small farm loan originations on March 1, 1997. At the time of this evaluation, bank regulatory agencies had not compiled market data based on these reports. As a result, market share analysis of small business and small farm lending within BOK's assessment areas was not possible.

The geographic distribution of small business and small farm loans in 1996 and YTD 1997 reflects good penetration throughout the assessment areas. The census tracts in each income level that did not have any loans had relatively few businesses located in them compared to the tracts where loans were made.

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Census Tract								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	17	50%	86	55%	169	60%	114	79%
Number of Businesses	3,168	4%	19,708	27%	33,404	45%	17,626	24%
Number of Farms	37	2%	323	20%	838	53%	392	25%
Loan Product	#	%	#	%	#	%	#	%
Small Business	64	5%	305	23%	559	42%	399	30%
Small Farm	1	1%	5	7%	51	68%	18	24%
Total 1996	65	5%	310	22%	610	44%	417	30%
Small Business	38	7%	136	26%	203	38%	152	29%
Small Farm	0	0%	0	0%	8	73%	3	27%
Total YTD 1997	38	7%	136	25%	211	39%	155	29%
Grand Total	103	5%	446	23%	821	42%	572	29%

Refer to Table 2 in **Appendix B** for details regarding the distribution of loan originations by dollar volume.

Home Mortgage Loans

Market share data available for 1995 indicates that BOK (with its mortgage affiliate) is the leading originator of HMDA reportable home mortgage loans in all assessment areas combined, with an overall market share of 9.2%. BOK is the clear leader in the origination of home mortgage loans for the purpose of home purchase or refinance with a market share of 9.8% and the nearest competitor at 4.0%. BOK ranks third among all lenders for home improvement loans in its assessment areas with over 6% of the market. A large military credit union and another bank headquartered in Oklahoma City were the leaders with 10.2% and 6.1% market share, respectively. Home improvement lending in BOK's assessment areas is highly competitive with the top ten lenders comprising 50% of the total market share.

The geographic distribution of home mortgage loan originations reflects good penetration throughout BOK's assessment areas. The low-income geographies that were not penetrated were primarily located in the Oklahoma City assessment area. These tracts contained few housing units. The following table illustrates the geographic distribution of loan originations:

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within All Assessment Areas (Including BancOklahoma Mortgage Corp) By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	23	68%	134	86%	269	95%	142	98%
Number of 1-4 Family Units	24,807	3%	169,545	24%	346,489	48%	174,627	24%
Median Year Built of Housing	1953		1958		1966		1972	
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	24	1%	627	15%	1,733	42%	1,697	42%
Home Improvement	10	2%	87	17%	205	39%	217	42%
Total 1995	34	1%	714	16%	1,938	42%	1,914	42%
Home Purchase/Refi	26	1%	465	10%	2,014	45%	1,945	44%
Home Improvement	5	1%	104	17%	272	44%	243	39%
Total 1996	31	1%	569	11%	2,286	45%	2,188	43%
Home Purchase/Refi	3	0%	130	9%	647	45%	646	45%
Home Improvement	2	1%	50	16%	130	42%	129	41%
Total YTD 1997	5	0%	180	10%	777	45%	775	45%
Grand Total	70	1%	1,463	13%	5,001	44%	4,877	43%

Refer to Table 3 in **Appendix B** for details regarding the distribution of loan originations by dollar volume.

Market share data available for 1995 indicates that BOK (with its mortgage affiliate) is the leading originator of HMDA reportable home mortgage loans in moderate-income geographies in its assessment areas with an overall market share of 10.3%. The data also shows that BOK is second in the number of loans made in low-income tracts. This market share is reflective of BOK's overall presence in these markets, particularly the Tulsa area, and its emphasis on home mortgage lending. The following table illustrates 1995 home mortgage loan originations market share by income level of the geography:

1995 Home Mortgage Loan Originations Market Share Within All Assessment Areas (Including BancOklahoma Mortgage Corp) by Income Level of the Census Tract									
	All Tracts			Low-Income Tracts			Moderate-Income Tracts		
Loan Product	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	4,083	9.8%	1	24	7.3%	2	627	10.3%	1
Home Improvement	519	6.1%	3	10	6.9%	5	87	5.1%	4

Only 329 home mortgage loans were made in low-income census tracts during 1995 by all HMDA reporters. The leading lender only made 50 loans, for a market share of 15.2%. The remaining lenders all made 24 or fewer loans within low-income tracts in all of BOK's assessment areas.

Consumer Loans

Although BOK chose to compile consumer loan data, banks are not required to maintain or submit consumer loan data; therefore, no market share data reports are available for this type of lending. A significant portion of the other unsecured loans in 1996 are student loans.

The geographic distribution of consumer loans made in 1996 and YTD 1997 reflects excellent penetration throughout BOK's assessment areas. Those geographies with no loans were either in outlying sections of the assessment areas where no branches are located, or in areas with few households. The following table illustrates the geographic distribution of loan originations by loan type:

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	33	97%	143	92%	262	93%	141	97%
Number of Households	24,520	3%	182,934	23%	391,747	49%	200,336	25%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	89	2%	880	20%	2,029	46%	1,450	33%
Credit Card Loans	5	1%	84	14%	253	42%	256	43%
Home Equity Loans	3	1%	41	9%	181	41%	220	49%
Other Secured Loans	25	1%	316	15%	932	44%	822	39%
Other Unsecured Loans	619	4%	3,571	23%	6,646	44%	4,405	29%
Total 1996	741	3%	4,892	21%	10,041	44%	7,153	31%
Motor Vehicle Loans	21	2%	235	19%	544	43%	462	37%
Credit Card Loans	1	0%	28	12%	84	36%	118	51%
Home Equity Loans	3	1%	44	8%	213	38%	295	53%
Other Secured Loans	10	1%	108	15%	319	44%	296	40%
Other Unsecured Loans	21	1%	150	10%	597	39%	747	49%
Total YTD 1997	56	1%	565	13%	1,757	41%	1,918	45%
Grand Total	797	3%	5,457	20%	11,798	43%	9,071	33%

Refer to Table 5 in **Appendix B** for details regarding the distribution of loan originations by dollar volume.

Distribution by Borrowers' Income within the Assessment Area

Small Business and Farm Loans

The distribution of small business and farm loans to businesses and farms of different sizes is good. The distribution analysis reflects the bank's effort to make small business loans to businesses of all sizes. The following table illustrates in greater detail the distribution of BOK's small business and farm loans by loan size and business revenue. For comparison, the table also illustrates the distribution, by gross annual revenues, of all small businesses and farms located in the bank's assessment areas.

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Loan Size and Business Revenues														
Loan Size					Annual Revenues < \$1 Million									
	#	%	\$ (000)	%	#	%*	\$ (000)	%*						
less than \$100,000	1,478	76%	\$45,184	23%	934	63%	\$28,432	63%						
\$100,000 to \$250,000	229	12%	\$39,165	20%	133	58%	\$21,973	56%						
\$250,000 to \$1,000,000	227	12%	\$111,027	57%	95	42%	\$44,653	40%						
Totals	1,934	100%	\$195,376	100%	1,162	60%	\$95,058	49%						
Distribution of Businesses and Farms in the Assessment Area by Annual Revenues of the Business or Farm:					<table> <tr> <td>< 1 Million</td> <td>72%</td> </tr> <tr> <td>> 1 Million</td> <td>9%</td> </tr> <tr> <td>Unknown</td> <td>19%</td> </tr> </table> <p>*As a percentage of loans of the size category</p>				< 1 Million	72%	> 1 Million	9%	Unknown	19%
< 1 Million	72%													
> 1 Million	9%													
Unknown	19%													

Home Mortgage Loans

A review of HMDA lending activities from 1995 through the date of this evaluation indicates the bank is doing a good job of serving the home mortgage needs of all borrowers, including those with low and moderate incomes. The bank's lending patterns are reflective of lending opportunities in the assessment areas. The following table illustrates the bank's distribution of mortgage loan products among borrowers of different income levels.

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within All Assessment Areas (Including BancOklahoma Mortgage Corp) By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	113,297	20%	99,514	18%	125,020	22%	227,359	40%
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	241	7%	607	18%	944	27%	1,655	48%
Home Improvement	43	9%	73	16%	111	24%	243	52%
Total 1995	284	7%	680	17%	1,055	27%	1,898	48%
Home Purchase/Refi	239	6%	686	16%	1,135	27%	2,159	51%
Home Improvement	61	11%	84	15%	134	24%	274	50%
Total 1996	300	6%	770	16%	1,269	27%	2,433	51%
Home Purchase/Refi	94	7%	238	17%	365	26%	705	50%
Home Improvement	22	7%	34	12%	61	21%	178	60%
Total YTD 1997	116	7%	272	16%	426	25%	883	52%
Grand Total	700	7%	1,722	17%	2,750	26%	5,214	50%

Refer to Table 4 in **Appendix B** for details regarding the distribution of loan originations by dollar volume.

BOK is the leading originator of home mortgage loans to low- and moderate-income borrowers, and ranks fifth in home improvement loans to low-income borrowers. This market share is reflective of both BOK's market dominance in some of its assessment areas and its emphasis on home mortgage lending. The following market share data for 1995 provides a more detailed description of how BOK's mortgage lending performance compares to other financial institutions in the assessment area.

1995 Home Mortgage Loan Originations Market Share Within All Assessment Areas (Including BancOklahoma Mortgage Corp) by Income Level of the Borrower									
Loan Product	All Borrowers			Low-Income Borrowers			Mod-Income Borrowers		
	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	4,083	9.8%	1	241	9.5%	1	607	9.1%	1
Home Improvement	519	6.1%	3	43	4.9%	5	73	4.9%	4

Consumer Loans

The distribution of BOK's consumer loans within the defined assessment areas is good. The results of our review indicate BOK's overall consumer lending performance to borrowers with different incomes generally represents the total population of borrowers with different incomes, giving consideration for differences in borrowing capacity. The following table illustrates how these loans are distributed among borrowers of different income levels.

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	113,297	20%	99,514	18%	125,020	22%	227,359	40%
Characteristics of Households	188,098	24%	127,954	16%	153,525	19%	329,944	41%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	526	12%	1,008	23%	1,152	26%	1,674	38%
Credit Card Loans	105	18%	88	15%	154	26%	247	42%
Home Equity Loans	18	4%	40	9%	82	19%	298	68%
Other Secured Loans	92	9%	159	15%	250	24%	530	51%
Other Unsecured Loans	284	15%	319	17%	384	20%	931	49%
Total 1996	1,025	12%	1,614	19%	2,022	24%	3,680	44%
Motor Vehicle Loans	172	14%	301	24%	314	25%	456	37%
Credit Card Loans	34	15%	46	20%	57	25%	94	41%
Home Equity Loans	33	6%	56	10%	116	21%	344	63%
Other Secured Loans	14	6%	39	17%	51	22%	130	56%
Other Unsecured Loans	157	10%	202	13%	263	17%	884	59%
Total YTD 1997	410	11%	644	17%	801	21%	1,908	51%
Grand Total	1,435	12%	2,258	19%	2,823	23%	5,588	46%

Refer to Table 6 in **Appendix B** for details regarding the distribution of loan originations by dollar volume.

Community Development Lending

BOK has made an adequate level of community development loans, based on the opportunities available within its assessment areas. Community development loans are those loans whose primary purpose meets the definition of community development lending contained in the CRA regulation and that have not been considered in the review of small business, small farm, home mortgage, or consumer loans.

Based on information provided by BOK, 24 community development loans totaling approximately \$13 million have been originated since the last CRA examination. The loans were distributed among five of six assessment areas, with the largest number in Tulsa, and the greatest dollar volume in the Muskogee area. The purposes of the loans were varied, with 14 providing affordable housing, seven to entities providing community services primarily to low- and moderate-income individuals, two to revitalize/stabilize a low- or moderate-income geography, and one to promote economic development in a low- or moderate-income geography. All of the loans benefitted BOK's assessment areas.

Product Innovation and Flexibility

BOK uses innovative products and flexible underwriting guidelines in serving the home mortgage credit needs of its assessment areas. BOK offers two innovative home mortgage products, with flexible underwriting criteria, to help meet the home financing needs of low- and moderate-income individuals. In addition, the bank offers a flexible home improvement loan product. The bank does not offer any innovative credit products for small businesses or farms or for non-residential consumer loans. The special programs offered by the bank are:

Zero-Down Homeward Bound

This mortgage loan product was introduced in November 1993. The product is available to finance single-family, owner-occupied homes in low- and moderate-income census tracts or being purchased by low- or moderate-income applicants in any census tract within the bank's assessment areas. This adjustable-rate product offers 100% financing with no origination fee. Interest rate adjustments are limited to 2% at the end of years three and six with a lifetime cap of 4%. Private mortgage insurance is not required. Applicants must pay the first \$1,000 of closing costs and all pre-paid items but can use gift money for both items.

BOK has set a cap of \$30 million for total outstandings in this portfolio and funds are still available for the program. Since its last CRA evaluation in February 1995, BOK has originated 419 of these loans totaling \$15.5 million.

Community Spirit Advantage Plus

This mortgage loan product was introduced in June 1997. The product has been designed to provide many of the same benefits as the Zero-Down Homeward Bound product but with a fixed, market-rate interest. Key differences include a 3% down payment requirement, no cap on closing

costs and higher debt to income ratios. The down payment may come from the borrower's own funds, a gift from a relative, a grant from a non-profit organization, or an unsecured loan from BOK, subject to qualification.

Since this product was just introduced, there have been no originations to date.

Community Spirit Home Improvement Loans

This home improvement loan program was introduced in February 1993. This fixed-rate loan product offers extended repayment terms to individuals who meet low- or moderate-income guidelines specified by the Department of Housing and Urban Development.

The bank was unable to provide loan origination totals since the prior CRA evaluation in February 1995.

Small Business Administration (SBA) Lending

BOK was recently designated as a "preferred" lender with the SBA. This designation further streamlines the approval process for small business applicants. Since the last CRA evaluation in February 1995, BOK has only originated 39 SBA loans totaling \$4.8 million. The bank recently established a special unit for SBA lending and anticipates that SBA lending activity will increase substantially.

INVESTMENT TEST

To assess BOK's performance under the Investment Test, we reviewed its investment and grant activity; responsiveness to credit and community development needs; and, its initiatives with community development.

Conclusions:

- ▶ BOK has an adequate level of qualified community development related investments. All except one of such investments are grants. The investment and grants are not considered innovative or complex.

Qualifying investments are investments, deposits, membership shares or grants that have as their primary purpose community development, as defined in the CRA regulation. Based on information provided by the bank, BOK has fifty-nine qualifying community development investments and grants totaling \$1,255,301 and two in-kind contributions totaling approximately \$17,468. Grants have been extended in all assessment areas and were to organizations which promote community development. Examples of such include homeless shelters, groups promoting affordable housing, battered women's shelters, and various other groups which provide health, economic, and general welfare assistance to low- and moderate-income individuals/families. The bank's in-kind contributions included providing of printing services and branch office space to a local community service organization.

Although the bank has an adequate level of qualified community development grants and investments in the Tulsa, Oklahoma City, and Enid MSA assessment areas, opportunities in the nonmetropolitan assessment areas (Northeastern Oklahoma Region, Muskogee Region, and Kay County Region) allow for improvement. Refer to the “Summary of Institution’s Operations in the Nonmetropolitan Statewide Areas” section for details.

SERVICE TEST

In assessing BOK’s performance under the Service Test, we focused on the accessibility of its delivery systems; changes in branch locations; reasonableness of its business hours and services in meeting the needs of its assessment areas; and, level of community development services.

Conclusions:

- ▶ BOK’s delivery systems are accessible to essentially all portions of its assessment area.
- ▶ Branch openings and closings have not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or individuals.
- ▶ Services and business hours do not vary in a way that would inconvenience any portions of the assessment areas.
- ▶ BOK provides a relatively high level of community development services, based on the opportunities available in the assessment areas.

Retail Banking Services

The quantity, quality, and accessibility of BOK’s service-delivery system within its assessment areas is satisfactory, given the significant branching restrictions mandated by state law. The bank provides a wide range of services at its main office and branch locations. Services among office locations do not vary as to inconvenience portions of the assessment areas, particularly low- and moderate-income geographies. Hours of operation are equitable bank wide. Additionally, bi-lingual services in several languages are available when needed.

Branches are located throughout the assessment areas. Eight branches have been opened during the evaluation period, all of which have been located in large grocery/retail stores. Four are located in upper-income census tracts and four are located in middle-income census tracts. Additionally, four other branches have been relocated to large grocery/retail stores. All of the relocations were from middle- or upper-income census tracts to upper-income census tracts. One branch has been closed and consolidated into another branch in close proximity. None of the relocations or the consolidation have adversely affected the bank’s delivery systems to low- and moderate-income geographies and/or individuals.

BOK has eight Loan Production Offices (LPOs) within its assessment areas which provide additional access to mortgage products. The majority are located in upper-income census tracts, the areas with the greatest volume of mortgage loans. In addition, the bank has mortgage lenders in-house at ten branches, including both of the branches located in low-income areas and two of the eight branches located in moderate-income areas.

To further provide access to financial services, the bank also operates a large number of proprietary ATMs throughout the assessment areas. Several have been opened during the evaluation period, including a facility built to better serve the banking needs of those persons living in the low- and moderate-income census tracts which surround the ATM.

The following table illustrates the aggregate distribution of BOK's branch, LPO and ATM locations by income level for all assessment areas:

Distribution of Delivery System By Income Level of the Census Tracts									
Community Data	Low-Income		Mod-Income		Middle-Income		Upper-Income		
Census Tracts	34	6%	156	25%	283	46%	145	23%	
Households	24,520	3%	182,934	23%	391,747	49%	200,336	25%	
Type of Service	#	%	#	%	#	%	#	%	
Branches	2	3%	8	14%	17	29%	31	53%	
LPOs	0	0%	1	13%	2	25%	5	63%	
ATMs	21	11%	40	20%	66	33%	72	36%	
Totals	23	9%	49	18%	85	32%	108	41%	

Source: Bank's Internal Records. Note: The bank has 2 ATMs located in downtown Oklahoma City in a census tract not designated by income level. These ATMs are not reflected in the numbers above.

The bank makes extensive use of alternative delivery systems in an effort to reach a broader section of its assessment areas and to compensate for branching restrictions mandated by state law. In addition to branches and proprietary ATMs, the bank offers the following services:

- ▶ **24-Hour Express Banking** - a full-service banking system which enables customers to perform a variety of functions including applying for a loan or talking to an Express Banker about any BOK product, current interest rates, and more.
- ▶ **BillPay Express** - bill paying service using the telephone available 24 hours a day, 7 days a week.
- ▶ **PC Express** - bill paying service using your personal computer.
- ▶ **Video ExpressBanking** - provides face-to-face communication for all services available through 24-Hour Express Banking (currently available at two locations).

- ▶ **Personal Finance Manager** - provides online software to assist with record keeping and financial planning.
- ▶ **Internet Website** - provides information on student loans and allows web surfers to enter their name and address if they would like to request information and an application for a student loan.

Community Development Services

BOK provides other services in the assessment areas related to the provision of financial services whose primary purpose is community development. These services include providing technical assistance on financial matters to nonprofit organizations which serve low- and moderate-income individuals/families and to other groups or small businesses which promote community revitalization, community development, or affordable housing. BOK also provides financial planning to individuals/groups and provide home ownership counseling to individuals/groups, primarily focusing on those in low- and moderate-income categories. All of these services benefit the bank's assessment areas. The following are examples of these services:

Community Spirit Program - This program was designed and developed by BOK to provide financial services for low- and moderate-income families and small business throughout the communities it serves. These services include low-cost basic checking accounts, no fee and no minimum balance savings accounts, and various home purchase, home improvement, and small business loans tailored to meet the needs of low- and moderate-income individuals/families and small businesses.

Banking Basics - A program for presentation to community groups which summarizes basic banking services and provides information on learning to manage a checking account, how to establish a budget, how to apply for a loan, the importance of credit, small business financing, and a small business question and answer forum. This service is free of charge and is held at a time and location convenient to the group requesting the presentation.

Bilingual Services - Personnel who speak a variety of languages are available to provide interpretation services when needed. This increases access to the bank's financial services for individuals who cannot conduct business in English, often low- and moderate-income individuals.

Access Oklahoma ATM Services - Access Oklahoma Cards are "money cards" which the State of Oklahoma has recently issued to persons receiving certain types of state assistance. ATM access is required to obtain these funds. BOK has modified its ATMs to accept these cards and does not charge a fee for the use of its ATM.

Project Get Together - This organization focuses on providing affordable housing. BOK provides personnel to Project Get Together who provide training focused on basic banking techniques and practices and the financial aspects of home ownership.

Credit Fair - BOk has coordinated and hosted several credit fairs in which the bank, Consumer Credit Counseling, and the local credit bureau provide information on basic banking services, budgeting, how to apply for a loan, home ownership counseling, understanding credit reports, how to improve your credit, etc.. Programs are provided free of charge and are held at a time and location convenient to the requesting group.

Aldridge Apartments - The bank, in partnership with Aldridge Developers Inc., formulated and presented an affordable housing proposal to the Federal Home Loan Bank of Topeka for a direct grant subsidy to supplement the development of the abandoned Aldridge Hotel in McAlester into the Aldridge Apartments. The apartments will be leased to low- and moderate-income elderly persons. The bank has entered into two other similar partnerships for the development of housing for low- and moderate-income individuals/families, both located in the Tulsa assessment area.

Country Oaks - BOk, in partnership with Vintage Housing Inc., drafted and presented an affordable housing proposal to the Federal Home Loan Bank of Topeka for a direct grant subsidy to supplement the development of Country Oaks, Tulsa, for the purpose of providing low- and moderate-income housing for the elderly.

Norwood Apartments - The bank, in partnership with Project Get Together, prepared and submitted an affordable housing proposal to the Federal Home Loan Bank of Topeka for a direct grant subsidy to supplement the development of Norwood Apartments located in Tulsa. These apartments are for the express purpose of providing housing to low- and moderate-income individuals/families.

Fair Lending Review

No violations of the substantive provisions of the antidiscrimination laws and regulations were identified in a review of home improvement lending conducted during the concurrent compliance examination of the bank. The bank has established good policies, procedures and training programs to ensure compliance with antidiscrimination laws and regulations.

Metropolitan Statistical Areas

Summary of Institution’s Operations in the Tulsa MSA

BOK operates its main office and 21 full-service branch offices in the five-county Tulsa MSA. All are located in Tulsa County, and seven are located in, or adjacent to low- or moderate-income census tracts. The bank has 123 proprietary ATMs in the Tulsa MSA.

The Tulsa MSA assessment area is BOK’s primary market. The offices in this assessment area account for 65% of the bank’s total loan portfolio and 59% of the bank’s total deposits as of June 1997. BOK is the largest commercial bank in the Tulsa MSA, holding approximately 27% of the total commercial bank deposits in the MSA. Local banking competition is aggressive and includes numerous small community banks and affiliates of large, national banking companies headquartered outside the state.

Description of the Tulsa MSA

The Tulsa MSA is comprised of 205 census tracts within five counties of northeast Oklahoma. All five counties contain low- or moderate-income census tracts. One-hundred fifty-six (156) of these tracts are located in Tulsa County. The table provides a summary of how these tracts are classified by income category and the income characteristics of the families living in the assessment area. Additional demographic data is included in the various tables presented in the “Conclusions with Respect to Performance Tests in the Tulsa MSA” section.

Bank of Oklahoma, N.A., Tulsa MSA Assessment Area															
Low-Income				Moderate-Income				Middle-Income				Upper-Income			
Census Tracts		Families		Census Tracts		Families		Census Tracts		Families		Census Tracts		Families	
11	5%	39,776	20%	53	26%	34,654	18%	91	44%	43,404	22%	50	24%	77,905	40%

The Tulsa MSA had a 1990 U.S. Census population of 708,954 with 70% living in Tulsa County. The 1990 U.S. Census median family income for the Tulsa MSA is \$32,578. The 1996 updated median family income for the MSA, provided by the Department of Housing and Urban Development (HUD), is \$38,400. Approximately 28% of the households in the MSA receive social security or public assistance.

Approximately 89% of the total housing units in the Tulsa MSA are occupied and 66% are owner occupied. The economic conditions in the Tulsa MSA are sound. Aerospace, telecommunications, energy, and health care/medical services remain predominant industries.

A review of peer bank CRA Performance Evaluations and 15 community contacts conducted within the assessment area by the OCC and other banking regulators during the previous 12

months indicates a number of opportunities to participate in community development lending, investments and service activities. The contacts identified the primary credit needs of the community as affordable housing loans, loans to revitalize/renovate low-income areas and small business loans.

Conclusions with Respect to Performance Tests in the Tulsa MSA

LENDING TEST

Lending Activity

BOK's lending activity in the Tulsa MSA assessment area generally exceeds that noted bank wide. Internal records reflect a loan-to-deposit ratio for this area in excess of 80%. An analysis of loan originations during the time period of this evaluation revealed that 54% of all originations within the bank's assessment areas were made in the Tulsa MSA assessment area. This closely corresponds to the relationship of deposits taken from within the assessment area.

Geographic Distribution of Loans within the Tulsa MSA

Small Business and Farm Loans

The distribution of small business and small farm loans within the Tulsa MSA assessment area reflects good penetration throughout the various income levels of census tracts. The volume of low-income census tracts penetrated is low; however, the number of businesses located in the tracts with no loans is less than 28% of the total number of businesses located in low-income census tracts. The moderate-income census tracts with no small business or small farms loans contain only 15% of the total number of businesses located in moderate-income tracts. The following table illustrates the geographic distribution of small business and small farm loans within the Tulsa MSA assessment area:

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Tulsa MSA Assessment Area By Income Level of the Census Tract								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	11	5%	53	26%	91	44%	50	24%
Census Tracts Penetrated (% of tracts in income group)	5	45%	36	68%	67	74%	47	94%
Number of Businesses	893	3%	7,528	26%	12,780	45%	7,304	26%
Number of Farms	14	3%	111	21%	272	51%	133	25%
Loan Product	#	%	#	%	#	%	#	%
Small Business	16	3%	160	27%	236	39%	188	31%
Small Farm	1	4%	4	17%	14	61%	4	17%
Total 1996	17	3%	164	26%	250	40%	192	31%
Small Business	10	4%	72	29%	103	41%	67	27%
Small Farm	0	0%	0	0%	1	50%	1	50%
Total YTD 1997	10	4%	72	28%	104	41%	68	27%
Grand Total	27	3%	236	27%	354	40%	260	30%

Home Mortgage Loans

The distribution of home mortgage loan originations reflects good penetration throughout the assessment area. All but one of the census tracts in the Tulsa MSA assessment area have had loans originated from 1995 through YTD 1997. The one moderate-income census tract with no loans is located in Creek County. BOK does not have any branches located in Creek County. The volume of loans by income category reflects a reasonable distribution among the census tracts. The following table illustrates the geographic distribution of home mortgage loans within the Tulsa MSA assessment area:

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Tulsa MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	11	5%	53	26%	91	44%	50	24%
Census Tracts Penetrated (% of tracts in income group)	11	100%	52	98%	91	100%	50	100%
Number of 1-4 Family Units	10,239	4%	56,978	24%	114,447	49%	53,721	23%
Median Year Built of Housing	1952		1957		1971		1976	
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	17	1%	391	17%	975	41%	969	41%
Home Improvement	9	3%	51	17%	125	42%	114	38%
Total 1995	26	1%	442	17%	1,100	41%	1,083	41%
Home Purchase/Refi	15	1%	241	10%	1,047	44%	1,053	45%
Home Improvement	5	2%	50	15%	138	43%	131	40%
Total 1996	20	1%	291	11%	1,185	44%	1,184	44%
Home Purchase/Refi	0	0%	66	9%	344	47%	329	45%
Home Improvement	2	1%	21	13%	64	38%	80	48%
Total YTD 1997	2	0%	87	10%	408	45%	409	45%
Grand Total	48	1%	820	13%	2,693	43%	2,676	43%

Market share data available for 1995 indicates that BOK is the leader among financial institutions originating HMDA reportable home mortgage loans in moderate-income geographies in the Tulsa MSA with 15.2% of the market share. The institution with the second leading level of loans in moderate-income tracts only has a 7.1% market share in the Tulsa MSA. BOK is second in volume of loans originated in low-income census tracts with 11.9% of the market share. The leader is a mortgage corporation that had a market share of 22.1%. Behind BOK was another mortgage company that had only 6.2% market share of all HMDA reportable loans made in low-income census tracts in the Tulsa MSA. This level of lending is consistent with BOK's dominance in the Tulsa area and its emphasis on mortgage lending. The following table illustrates 1995 home mortgage loan originations market share by income level of the geography in the Tulsa MSA:

1995 Home Mortgage Loan Originations Market Share Within the Tulsa MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Census Tract									
	All Tracts			Low-Income Tracts			Moderate-Income Tracts		
Loan Product	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	2,354	14.5%	1	17	9.9%	2	391	16.6%	1
Home Improvement	299	11.0%	2	9	17.7%	1	51	9.5%	2

Of all HMDA originations made in 1995 in the Tulsa MSA assessment area, only 226 or 1.19% were located in low-income census tracts.

Consumer Loans

The distribution of consumer loans originated within the Tulsa MSA assessment area reflects excellent penetration. The moderate-income tracts with no loans are located in the outlying areas of the MSA where no branches are located. The distribution within the various income levels was reasonable. Consumer loans were made in all low-income tracts, but were primarily concentrated in two tracts in the center of Tulsa that are undergoing revitalization and have many families who are below the poverty level. The following table illustrates consumer loan originations in 1996 and YTD 1997 within the Tulsa MSA assessment area by income level of the census tract:

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Tulsa MSA Assessment Area By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	11	5%	53	26%	91	44%	50	24%
Census Tracts Penetrated (% of tracts in income group)	11	100%	47	89%	90	99%	50	100%
Number of Households	11,009	4%	63,747	23%	138,643	50%	64,024	23%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	23	2%	176	15%	605	51%	383	32%
Credit Card Loans	4	1%	36	13%	120	44%	115	42%
Home Equity Loans	1	0%	28	11%	92	35%	144	54%
Other Secured Loans	17	2%	158	15%	460	45%	391	38%
Other Unsecured Loans	463	6%	1,725	21%	3,829	46%	2,378	28%
Total 1996	508	5%	2,123	19%	5,106	46%	3,411	31%
Motor Vehicle Loans	8	3%	49	16%	144	48%	96	32%
Credit Card Loans	1	1%	14	13%	38	35%	57	52%
Home Equity Loans	3	1%	16	6%	107	40%	142	53%
Other Secured Loans	8	2%	62	19%	148	44%	116	35%
Other Unsecured Loans	15	2%	64	7%	332	39%	451	52%
Total YTD 1997	35	2%	205	11%	769	41%	862	46%
Grand Total	543	4%	2,328	18%	5,875	45%	4,273	33%

Distribution by Borrowers' Income within the Tulsa MSA

Small Business and Farm Loans

The distribution of small business loans in the Tulsa MSA is adequate. A high percentage of these loans had original loan amounts of \$100 thousand or less, and a majority were to small businesses. The following table reflects the distribution of BOK's 1996 and YTD 1997 small business and farm loans in the Tulsa MSA assessment area, by original loan amount and the gross annual revenues of the businesses and farms. For comparison, the chart also illustrates the distribution, by gross annual revenues, of all small businesses and farms in the Tulsa MSA assessment area.

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Tulsa MSA Assessment Area By Loan Size and Business Revenues								
Loan Size					Annual Revenues < \$1 Million			
	#	%	\$ (000)	%	#	%*	\$ (000)	%*
less than \$100,000	643	73%	\$19,800	21%	393	61%	\$12,292	62%
\$100,000 to \$250,000	121	14%	\$21,206	22%	73	60%	\$12,362	58%
\$250,000 to \$1,000,000	113	13%	\$54,913	57%	56	50%	\$26,234	48%
Totals	877	100%	\$95,919	100%	522	60%	\$50,888	53%
Distribution of Businesses and Farms in the Assessment Area by Annual Revenues of the Business or Farm:				< 1 Million	73%	*As a percentage of loans of the size category		
				> 1 Million	10%			
				Unknown	17%			

Home Mortgage Loans

The distribution of home mortgage loans among borrowers of different income levels is reasonable. New housing construction primarily benefits middle- and upper-income individuals, and partially accounts for the high volume of loans to these borrowers. The following table reflects the distribution of BOK's HMDA reportable loans from 1995 through the date of this evaluation for the Tulsa MSA assessment area. For comparison, the chart also presents the distribution of all families living in the assessment area according to their income level.

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Tulsa MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	39,776	20%	34,654	18%	43,404	22%	77,905	40%
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	127	7%	292	16%	479	26%	973	52%
Home Improvement	32	12%	38	14%	68	25%	133	49%
Total 1995	159	7%	330	15%	547	26%	1,106	52%
Home Purchase/Refi	113	5%	316	14%	588	26%	1,210	54%
Home Improvement	32	11%	40	14%	63	22%	155	53%
Total 1996	145	6%	356	14%	651	26%	1,365	54%
Home Purchase/Refi	42	6%	106	15%	183	25%	396	54%
Home Improvement	8	5%	21	13%	30	19%	101	63%
Total YTD 1997	50	6%	127	14%	213	24%	497	56%
Grand Total	354	6%	813	15%	1,411	25%	2,968	54%

Market share data for 1995 reflects that BOK is the leader among financial institutions originating HMDA reportable home mortgage loans to low- and moderate-income borrowers in the Tulsa MSA and rank second in home improvement lending. Although good, this ranking is also reflective of the bank's dominance in the Tulsa market. The following table illustrates 1995 home mortgage loan originations market share by income level of the borrower in the Tulsa MSA:

1995 Home Mortgage Loan Originations Market Share Within the Tulsa MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Borrower									
	All Borrowers			Low-Income Borrowers			Mod-Income Borrowers		
Loan Product	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	2,354	14.5%	1	127	13.2%	1	292	11.5%	1
Home Improvement	299	11.0%	2	32	10.7%	2	38	8.2%	2

Consumer Loans

BOK's consumer loan distribution performance in the Tulsa MSA assessment area is good. The volume of lending reflects a reasonable penetration of consumer lending to all borrowers, including those with low- and moderate-incomes. The table below provides a more detailed summary of these distribution patterns.

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Tulsa MSA Assessment Area By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	39,776	20%	34,654	18%	43,404	22%	77,905	40%
Characteristics of Households	66,241	24%	44,331	16%	54,078	19%	112,764	41%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	146	12%	218	19%	295	25%	516	44%
Credit Card Loans	50	18%	37	13%	66	24%	122	44%
Home Equity Loans	9	3%	23	9%	41	16%	187	72%
Other Secured Loans	44	8%	79	14%	134	23%	319	55%
Other Unsecured Loans	143	13%	163	15%	208	19%	572	53%
Total 1996	392	12%	520	15%	744	22%	1,716	51%
Motor Vehicle Loans	42	14%	74	25%	60	20%	119	40%
Credit Card Loans	22	20%	21	19%	21	19%	46	42%
Home Equity Loans	14	5%	19	7%	55	21%	175	67%
Other Secured Loans	8	6%	26	20%	26	20%	69	53%
Other Unsecured Loans	75	9%	93	11%	159	19%	527	62%
Total YTD 1997	161	10%	233	14%	321	19%	936	57%
Grand Total	553	11%	753	15%	1,065	21%	2,652	53%

Community Development Lending

BOK has made an adequate level of community development loans, based on the opportunities available within the Tulsa MSA assessment area. Based on information provided by BOK, ten community development loans, totaling \$1.9 million have been originated since the February 9, 1995 Performance Evaluation. Four of the loans, totaling \$1.1 million, were for the purpose of constructing or rehabilitating affordable housing primarily for low- and moderate-income citizens. Three loans, totaling \$185 thousand, were to agencies who provide services primarily to low- and moderate-income individuals/families. Two loans, totaling \$645 thousand, were made to aid in the revitalization/stabilization of low-income areas of Tulsa. One of those loans was originated for the purpose of purchasing and rehabilitating an apartment complex in an area that is in the

process of revitalization, and the other was made to provide cash flow to a pharmacy that is located in a low-income area of Tulsa. The final loan for \$21 thousand was a participation in a pool of funds that provide micro loans to low- and moderate-income individuals to start their own small businesses. All of the loans benefited the Tulsa MSA assessment area.

INVESTMENT TEST

The bank has an adequate level of qualified community investments in the Tulsa MSA assessment area; however, the bank has not been a leader in the development of qualifying investments. BOK has provided twenty-two qualified investments/grants in the Tulsa MSA assessment area totaling \$989,775 and two in-kind contributions totaling \$17,468. Investments/grants have been concentrated in the Tulsa MSA, which would be anticipated as a significant number of the bank's deposits and loans are derived from the Tulsa MSA. Investments/grants have been provided to numerous non-profit organizations throughout the Tulsa MSA assessment area who serve the needs of the low- and moderate-income individuals/groups. These include the Tulsa Housing Assistance Corporation, Tulsa Area United Way, Salvation Army, and Day Center for the Homeless.

SERVICE TEST

Delivery systems are accessible to essentially all portions of the assessment area. BOK has one branch and 19 ATMs located in low-income census tracts and four branches and 27 ATMs located in moderate-income census tracts. These represent 23% and 37% of all branches and ATMs in the Tulsa MSA, respectively, as compared to 27% of all households being located in low- or moderate-income census tracts. Other alternative delivery systems within the Tulsa MSA are the same as those identified for the overall bank. Branch openings and closings have not adversely affected or materially improved delivery systems to low- and moderate-income areas. Only one branch in a middle-income area was closed and it was near another branch. Three branches were opened in large grocery stores in upper-income census tracts.

A relatively high level of community development services has been provided in Tulsa. Those services offered by BOK in the Tulsa MSA are consistent with those identified for the overall bank. Refer to the Service Test section of the "Conclusions With Respect to Performance Test" for additional details.

Metropolitan Statistical Areas

Summary of Institution’s Operations in the Oklahoma City MSA

BOK operates 22 full-service branch offices in the six-county Oklahoma City MSA. Seventeen are located in Oklahoma County, four are located in Cleveland County and one is located in Canadian County. Seven of the branches are located in, or adjacent to a low- or moderate-income census tracts. The bank has 61 proprietary ATMs in the Oklahoma City MSA.

The Oklahoma City MSA assessment area is the second largest market for BOK. The offices in this assessment area account for 27% of the bank’s total loan portfolio and 24% of the bank’s total deposits as of June 1997. BOK’s Oklahoma City branches hold approximately 9% of the total commercial bank deposits in the MSA, placing them third among the commercial banks in the MSA. Local banking competition is aggressive and includes affiliates of large, national banking companies headquartered outside the state, other large, locally-owned banks and many small community banks.

Description of the Oklahoma City MSA

The Oklahoma City MSA is comprised of 307 census tracts within six counties of central Oklahoma. All but one of these counties contain low- or moderate-income census tracts. The table provides a summary of how these tracts are classified by income category and the income characteristics of the families living in the assessment area. Additional demographic data is included in the various tables presented in the “Conclusions with Respect to Performance Tests in the Oklahoma City MSA” section.

Bank of Oklahoma, N.A., Oklahoma City MSA Assessment Area															
Low-Income				Moderate-Income				Middle-Income				Upper-Income			
Census Tracts		Families		Census Tracts		Families		Census Tracts		Families		Census Tracts		Families	
22	7%	51,683	20%	86	28%	45,687	18%	126	41%	58,695	23%	73	24%	101,515	39%

The Oklahoma City MSA had a 1990 U.S. Census population of 958,839, with 62% living in Oklahoma County. The 1990 U.S. Census median family income for the MSA is \$32,406 and the 1996 HUD-updated median family income is \$38,300. Approximately 27% of the households in the MSA receive social security or public assistance.

Approximately 86% of the total housing units in the Oklahoma City MSA are occupied and 55% are owner occupied. The economic conditions in the MSA are stable and improving. Predominant industries include state government, military, telecommunications, health care/medical services, and auto assembly.

A review of peer bank CRA Performance Evaluations and 25 community contacts conducted within the assessment area by the OCC and other banking regulators over the previous 12 months indicates a number of opportunities to participate in community development lending, investments and service activities. The contacts identified the primary credit needs of the community as small business loans, including start-up businesses, and neighborhood revitalization/home restoration loans. The community contacts generally thought that area banks were being responsive to home financing needs.

Conclusions with Respect to Performance Tests in the Oklahoma City MSA

LENDING TEST

Lending Activity

BOK's lending activity in the Oklahoma City MSA assessment area generally exceeds that noted bank wide. Internal records reflect a loan-to-deposit ratio for this area in excess of 80%. An analysis of loan originations during the time period of this evaluation revealed that 37% of all originations within the bank's assessment areas were made in the Oklahoma City MSA assessment area. This greatly exceeds the relationship of deposits taken from within the assessment area.

Geographic Distribution of Loans within the Oklahoma City MSA

Small Business and Small Farm Loans

The distribution of small business and small farm loans within the Oklahoma City MSA assessment area reflects adequate penetration throughout the various income levels of census tracts. The volume of census tracts penetrated in the low-, moderate-, and middle-income categories is low; however, a majority of the number of businesses (60% or higher) are located in the tracts where loans were made. The following table illustrates the geographic distribution of small business and small farm loans within the Oklahoma City MSA assessment area:

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area By Income Level of the Census Tract								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	22	7%	86	28%	126	41%	73	24%
Census Tracts Penetrated (% of tracts in income group)	11	50%	38	44%	63	50%	52	71%
Number of Businesses	1,947	6%	9,574	29%	13,752	41%	8,016	24%
Number of Farms	21	3%	156	24%	303	46%	179	27%
Loan Product	#	%	#	%	#	%	#	%
Small Business	22	5%	82	20%	167	42%	130	32%
Small Farm	0	0%	0	0%	3	75%	1	25%
Total 1996	22	5%	82	20%	170	42%	131	32%
Small Business	18	10%	42	24%	58	33%	56	32%
Small Farm	0	0%	0	0%	3	75%	1	25%
Total YTD 1997	18	10%	42	24%	61	34%	57	32%
Grand Total	40	7%	124	21%	231	40%	188	32%

Home Mortgage Loans

The distribution of home mortgage loan originations reflects good penetration throughout the assessment area. The volume of low-income census tracts penetrated is low; however, the number of 1-4 family units located in the tracts with no loans is only 21% of the total number of 1-4 family units located in low-income census tracts. The moderate-income census tracts with no home mortgage loans contain only 12% of the total number of 1-4 family units located in moderate-income tracts. The volume of loans by income category reflects a reasonable distribution among the census tracts. The following table illustrates the geographic distribution of home mortgage loans within the Oklahoma City MSA assessment area:

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	22	7%	86	28%	126	41%	73	24%
Census Tracts Penetrated (% of tracts in income group)	11	50%	68	79%	122	97%	72	99%
Number of 1-4 Family Units	14,319	4%	86,277	26%	143,223	44%	84,719	26%
Median Year Built of Housing	1946		1956		1967		1977	
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	7	0%	143	10%	652	46%	630	44%
Home Improvement	1	1%	28	14%	71	36%	99	50%
Total 1995	8	0%	171	10%	723	44%	729	45%
Home Purchase/Refi	10	1%	169	10%	758	46%	722	44%
Home Improvement	0	0%	27	16%	73	43%	71	42%
Total 1996	10	1%	196	11%	831	45%	793	43%
Home Purchase/Refi	3	1%	55	10%	242	44%	255	46%
Home Improvement	0	0%	19	20%	40	43%	34	37%
Total YTD 1997	3	0%	74	11%	282	44%	289	45%
Grand Total	21	1%	441	11%	1,836	45%	1,811	44%

Market share data available for 1995 indicates that BOK is the leader among financial institutions originating HMDA reportable home mortgage loans in the Oklahoma City MSA with 5.7% of the market share. This performance exceeds BOK's presence in the Oklahoma City area and reflects its focus on home mortgage lending.

Competition is high in the Oklahoma City MSA, with top ten lenders originating only 34.7% of the HMDA reportable loans. BOK is only seventh in volume of loans originated in low-income census tracts with 3.2% of the market share. However, the leading bank made only 26 loans, for a market share of 10.5%. Out of 28 thousand HMDA reportable home mortgage loans originated in 1995, only 248 were made in low-income census tracts. This indicates that the low-income tracts could be better served. The moderate-income tracts were slightly better served with BOK ranking fourth among institutions originating HMDA reportable home mortgage loans for an overall market share of 3.9%. The following table illustrates 1995 home mortgage loan originations market share by income level of the geography in the Oklahoma City MSA:

1995 Home Mortgage Loan Originations Market Share Within the Oklahoma City MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Census Tract									
	All Tracts			Low-Income Tracts			Moderate-Income Tracts		
Loan Product	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	1,432	6.2%	1	7	4.5%	5	143	4.3%	4
Home Improvement	199	3.8%	8	1	1.1%	18	28	2.6%	11

Consumer Loans

The distribution of consumer loans originated within the Oklahoma City MSA assessment area reflects excellent penetration. The low-income tract with no loans is located on the west edge of the downtown business district and contains only 36 households. The three moderate-income tracts with no loans are located in Logan, McClain, and Pottawatomie counties where BOK has no branches. The two middle- and one upper-income tracts with no loans contained a combined total of 28 households. The distribution within the various income levels of the census tracts was reasonable. The following table illustrates consumer loan originations in 1996 and YTD 1997 within the Oklahoma City MSA assessment area by income level of the census tract:

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	22	7%	86	28%	126	41%	73	24%
Census Tracts Penetrated (% of tracts in income group)	21	95%	83	97%	124	98%	72	99%
Number of Households	13,320	4%	93,463	25%	164,456	45%	97,263	26%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	66	2%	638	22%	1,218	43%	917	32%
Credit Card Loans	0	0%	37	19%	69	36%	84	44%
Home Equity Loans	1	1%	11	9%	64	50%	51	40%
Other Secured Loans	7	1%	111	15%	328	45%	286	39%
Other Unsecured Loans	153	3%	1,684	30%	2,224	39%	1,581	28%
Total 1996	227	2%	2,481	26%	3,903	41%	2,919	31%
Motor Vehicle Loans	13	2%	169	20%	347	41%	323	38%
Credit Card Loans	0	0%	9	13%	26	38%	33	49%
Home Equity Loans	0	0%	14	7%	74	35%	122	58%
Other Secured Loans	1	0%	25	9%	127	46%	121	44%
Other Unsecured Loans	3	1%	63	13%	191	39%	228	47%
Total YTD 1997	17	1%	280	15%	765	40%	827	44%
Grand Total	244	2%	2,761	24%	4,668	41%	3,746	33%

Distribution by Borrowers' Income within the Oklahoma City MSA

Small Business and Farm Loans

BOK's distribution of loans to small businesses and farms is fair. As the following table indicates, a high percentage of these loans were made with original amounts less than \$100 thousand. However, only slightly more than half of the total number of business and farm loans made since 1996 were made to businesses and farms with annual revenues less than \$1 million. Businesses and farms with revenues less than \$1 million make up seventy percent of the total population of businesses and farms in the assessment area. Recent discussions with members of the community who are most familiar with the credit needs of the assessment area indicate, among other items, the need for various small business lending products. This suggests that additional small business lending opportunities likely exist in the Oklahoma City MSA assessment area.

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area By Loan Size and Business Revenues														
Loan Size					Annual Revenues < \$1 Million									
	#	%	\$ (000)	%	#	%*	\$ (000)	%*						
less than \$100,000	425	74%	\$14,422	22%	239	56%	\$8,996	62%						
\$100,000 to \$250,000	68	12%	\$12,109	18%	33	49%	\$5,851	48%						
\$250,000 to \$1,000,000	83	14%	\$40,446	60%	27	33%	\$12,830	32%						
Totals	576	100%	\$66,977	100%	299	52%	\$27,677	41%						
Distribution of Businesses and Farms in the Assessment Area by Annual Revenues of the Business or Farm:					<table> <tr> <td>< 1 Million</td> <td>70%</td> </tr> <tr> <td>> 1 Million</td> <td>9%</td> </tr> <tr> <td>Unknown</td> <td>21%</td> </tr> </table> <p>*As a percentage of loans of the size category</p>				< 1 Million	70%	> 1 Million	9%	Unknown	21%
< 1 Million	70%													
> 1 Million	9%													
Unknown	21%													

Home Mortgage Loans

The distribution of home mortgage loans among borrowers of different income levels is good. The following table reflects the distribution of BOK's HMDA reportable loans from 1995 through the date of this evaluation for the Oklahoma City MSA assessment area. For comparison, the chart also presents the distribution of all families living in the assessment area according to their income level.

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	51,683	20%	45,687	18%	58,695	23%	101,515	39%
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	90	7%	287	21%	410	30%	570	42%
Home Improvement	8	4%	34	18%	41	22%	103	55%
Total 1995	98	6%	321	21%	451	29%	673	44%
Home Purchase/Refi	111	7%	326	20%	457	28%	731	45%
Home Improvement	16	11%	25	17%	44	30%	64	43%
Total 1996	127	7%	351	20%	501	28%	795	45%
Home Purchase/Refi	47	9%	117	21%	150	28%	231	42%
Home Improvement	9	10%	7	8%	22	26%	48	56%
Total YTD 1997	56	9%	124	20%	172	27%	279	44%
Grand Total	281	7%	796	20%	1,124	28%	1,747	44%

Market share data for 1995 reflects that BOk is the leader among financial institutions originating HMDA reportable home mortgage loans to all borrowers and to low-income borrowers in the Oklahoma City MSA. BOk ranks second in mortgage loans to moderate-income borrowers. These rankings exceed the bank's holdings of commercial bank deposits in the market. The following table illustrates 1995 home mortgage loan originations market share by income level of the borrower in the Tulsa MSA:

1995 Home Mortgage Loan Originations Market Share Within the Oklahoma City MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Borrower									
Loan Product	All Borrowers			Low-Income Borrowers			Mod-Income Borrowers		
	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	1,432	6.2%	1	88	6.2%	1	283	7.3%	2
Home Improvement	199	3.8%	8	8	1.6%	13	33	3.5%	7

Consumer Loans

The distribution of consumer loans among borrowers of different income levels in the Oklahoma City MSA assessment area is good. As the following table indicates, the loan distribution percentages across income levels are generally representative of the total population of residents in the assessment area with the same income level.

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Oklahoma City MSA Assessment Area By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	51,683	20%	45,687	18%	58,695	23%	101,515	39%
Characteristics of Households	86,455	23%	60,213	16%	72,747	20%	149,078	40%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	341	12%	727	26%	749	27%	960	35%
Credit Card Loans	35	19%	27	14%	55	29%	71	38%
Home Equity Loans	8	6%	12	10%	28	22%	78	62%
Other Secured Loans	36	12%	52	18%	77	27%	124	43%
Other Unsecured Loans	98	18%	119	22%	115	21%	207	38%
Total 1996	518	13%	937	24%	1,024	26%	1,440	37%
Motor Vehicle Loans	116	14%	210	25%	229	27%	295	35%
Credit Card Loans	8	12%	13	19%	16	24%	31	46%
Home Equity Loans	15	7%	29	14%	49	23%	116	56%
Other Secured Loans	6	9%	7	10%	22	33%	32	48%
Other Unsecured Loans	62	13%	80	16%	71	15%	272	56%
Total YTD 1997	207	12%	339	20%	387	23%	746	44%
Grand Total	725	13%	1,276	23%	1,411	25%	2,186	39%

Community Development Lending

BOK has made a low level of community development loans, based on the opportunities available within the Oklahoma City MSA assessment area. Based on information provided by BOK, five community development loans, totaling \$2.9 million have been originated since the February 9, 1995 Performance Evaluation. Three of the loans, totaling \$829 thousand, were for the purpose of constructing or rehabilitating affordable housing primarily for low- and moderate-income

citizens. One loan, for \$1.6 million, was refinance on a nursing home in El Reno, Oklahoma. A majority of the nursing home residents are low- and moderate-income. The other loan for \$440 thousand, was to an agency that provides services primarily to low- and moderate-income individuals/families. BOk does have five community development loans currently in the process stage, which should improve its performance in this area. All of the current loans benefited the Oklahoma City MSA assessment area.

INVESTMENT TEST

BOk has an adequate level of qualified community investments in the Oklahoma City assessment area; however, the bank has not been a leader in the development of these investments. BOk has provided twenty-one qualified investments/grants in the Oklahoma City MSA assessment area totaling \$236,432. The bank has been responsive to needs; however, investments are below what would be anticipated as the Oklahoma City area is a significant source of the bank's deposits and loans. Investments/grants have been provided to non-profit organizations throughout the Oklahoma City MSA assessment area who serve the needs of the low- and moderate-income individuals/groups. These include the United Way of Metro Oklahoma City, United Way of Norman, City Rescue Mission, and Eastern Oklahoma County Community Development Corporation.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the assessment area. BOk has no branches and one ATM located in low-income census tracts and three branches and 12 ATMs located in moderate-income census tracts. These represent 14% and 22% of all branches and ATMs in the Oklahoma City MSA, respectively, as compared to 29% of all households being located in low- or moderate-income census tracts. Other alternative delivery systems within the MSA are the same as those identified for the overall bank. Branch openings and closings have not adversely affected or materially improved delivery systems to low- and moderate-income areas. One branch in an upper-income area was closed. Four branches were opened in large grocery stores. Three were in middle-income census tracts and one was in an upper-income census tracts.

A relatively high level of community development services has been provided in Oklahoma City. Those services offered by BOk in the Oklahoma City MSA are consistent with those identified for the overall bank. Refer to the Service Test section of the "Conclusions With Respect to Performance Test" for additional details.

Metropolitan Statistical Areas

Summary of Institution’s Operations in the Enid MSA

BOK operates two full-service branch offices in the one-county Enid MSA. The bank has two proprietary ATMs in the Enid MSA.

The Enid MSA assessment area is a minor BOK market. The offices in this assessment area account for only 1% of the bank’s total loan portfolio and 2% of the bank’s total deposits as of June 1997. BOK’s Enid branches account for approximately 13% of the commercial banking deposits in the MSA. The two largest banks in the area are headquartered in Enid and provide aggressive competition.

Description of the Enid MSA

The Enid MSA is comprised of 12 census tracts in one county of north central Oklahoma. The table provides a summary of how these tracts are classified by income category and the income characteristics of the families living in the assessment area. Additional demographic data is included in the various tables presented in the “Conclusions with Respect to Performance Tests in the Enid MSA” section.

Bank of Oklahoma, N.A., Enid MSA Assessment Area															
Low-Income				Moderate-Income				Middle-Income				Upper-Income			
Census Tracts		Families		Census Tracts		Families		Census Tracts		Families		Census Tracts		Families	
0	0%	2,983	19%	3	25%	2,984	19%	8	67%	3,877	24%	1	8%	6,071	38%

The total population for the MSA was reported at 56,735 as of the 1990 U.S. Census. The city of Enid represented slightly more than 45,000 of this population base. The 1990 U.S. Census median family income for the MSA is \$28,220 and the 1996 HUD-updated median family income for the area is \$32,600. Approximately 35% of the households in the MSA receive social security or public assistance.

Approximately 84% of the total housing units are occupied and 58% are owner occupied. The median housing value for the MSA is \$30,350 and the median year built is reported to be 1965. The economic conditions in the Enid MSA are considered to be stable and the predominant industries include military, agriculture, health care/medical services, and manufacturing.

A review of two community contacts conducted within the assessment area by the OCC and other banking regulators over the previous 12 months indicates some opportunities to participate in community development activities. The contacts identified the primary credit needs of the community as commercial loans and affordable home improvement loans.

Conclusions with Respect to Performance Tests in the Enid MSA

LENDING TEST

Lending Activity

BOK's lending activity in the Enid MSA assessment area is below that noted bankwide. Internal records reflect a loan-to-deposit ratio for this area of less than 50%. However, an analysis of loan originations during the time period of this evaluation revealed that 3% of all originations within the bank's assessment areas were made in the Enid MSA assessment area. This closely corresponds to the relationship of deposits taken from within the assessment area.

Geographic Distribution of Loans within the Enid MSA

Small Business and Small Farm Loans

The distribution of small business and small farm loans within the Enid MSA assessment area reflects good penetration throughout the various income levels of census tracts. The distribution by income level of the tract is reasonable. The following table illustrates the geographic distribution of small business and small farm loans within the Enid MSA assessment area:

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Enid MSA Assessment Area By Income Level of the Census Tract								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	0	0%	3	25%	8	67%	1	8%
Census Tracts Penetrated (% of tracts in income group)	N/A	N/A	3	100%	7	88%	1	100%
Number of Businesses	0	0%	823	38%	981	46%	344	16%
Number of Farms	0	0%	6	8%	51	72%	14	20%
Loan Product	#	%	#	%	#	%	#	%
Small Business	0	0%	6	20%	15	50%	9	30%
Small Farm	0	0%	1	8%	10	83%	1	8%
Total 1996	0	0%	7	17%	25	60%	10	24%
Small Business	0	0%	2	22%	6	67%	1	11%
Small Farm	0	0%	0	0%	0	0%	0	0%
Total YTD 1997	0	0%	2	22%	6	67%	1	11%
Grand Total	0	0%	9	18%	31	61%	11	22%

Home Mortgage Loans

The distribution of home mortgage loan originations reflects excellent penetration throughout the assessment area with loans being made in all census tracts located in the Enid MSA. The volume of loans by income category reflects a reasonable distribution among the census tracts. The following table illustrates the geographic distribution of home mortgage loans within the Enid MSA assessment area:

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Enid MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	0	0%	3	25%	8	67%	1	8%
Census Tracts Penetrated (% of tracts in income group)	N/A	N/A	3	100%	8	100%	1	100%
Number of 1-4 Family Units	0	0%	7,427	31%	11,691	49%	4,509	19%
Median Year Built of Housing	N/A		1949		1965		1976	
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	0	0%	93	31%	106	36%	98	33%
Home Improvement	0	0%	8	38%	9	43%	4	19%
Total 1995	0	0%	101	32%	115	36%	102	32%
Home Purchase/Refi	0	0%	27	27%	37	37%	35	35%
Home Improvement	0	0%	9	30%	13	43%	8	27%
Total 1996	0	0%	36	28%	50	39%	43	33%
Home Purchase/Refi	0	0%	1	4%	15	63%	8	33%
Home Improvement	0	0%	6	27%	8	36%	8	36%
Total YTD 1997	0	0%	7	15%	23	50%	16	35%
Grand Total	0	0%	144	29%	188	38%	161	33%

Market share data available for 1995 indicates that BOK is the leader among financial institutions originating HMDA reportable home mortgage loans in the Enid MSA with 20.7% of the market share. The next two highest lenders are locally owned banks with 15.7% and 11.8% of the market share of all HMDA reportable loans made in the Enid MSA. BOK's mortgage lending in this market exceeds its overall presence in this market and is reflective of its emphasis on mortgage lending.

BOK is also the leader among institutions making loans in the moderate-income tracts in the Enid MSA with a market share of 30.7%. The same two locally owned banks follow in the moderate-income category with 23.7% and 10% market share. There are no low-income census tracts located in the Enid MSA. The following table illustrates 1995 home mortgage loan originations market share by income level of the geography in the Enid MSA:

1995 Home Mortgage Loan Originations Market Share Within the Enid MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Census Tract									
Loan Product	All Tracts			Low-Income Tracts			Moderate-Income Tracts		
	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	297	24.6%	1	0	N/A	N/A	93	35.5%	1
Home Improvement	21	6.4%	5	0	N/A	N/A	8	11.9%	4

Consumer Loans

The distribution of consumer loans originated within the Enid MSA assessment area reflects excellent penetration. All census tracts had loans originated within them. The distribution within the various income levels of the census tracts was reasonable. The following table illustrates consumer loan originations in 1996 and YTD 1997 within the Enid MSA assessment area by income level of the census tract:

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Enid MSA Assessment Area By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	0	0%	3	25%	8	67%	1	8%
Census Tracts Penetrated (% of tracts in income group)	N/A	N/A	3	100%	8	100%	1	100%
Number of Households	0	0%	6,219	27%	11,680	52%	4,728	21%
Loan Product	#	%	#	%	#	%	#	%
Motor Vehicle Loans	0	0%	26	39%	24	36%	17	25%
Credit Card Loans	0	0%	6	46%	5	38%	2	15%
Home Equity Loans	0	0%	0	0%	4	31%	9	69%
Other Secured Loans	0	0%	14	18%	32	42%	31	40%
Other Unsecured Loans	0	0%	43	33%	53	40%	35	27%
Total 1996	0	0%	89	30%	118	39%	94	31%
Motor Vehicle Loans	0	0%	5	20%	11	44%	9	36%
Credit Card Loans	0	0%	2	50%	2	50%	0	0%
Home Equity Loans	0	0%	3	12%	8	32%	14	56%
Other Secured Loans	0	0%	11	41%	6	22%	10	37%
Other Unsecured Loans	0	0%	6	26%	11	48%	6	26%
Total YTD 1997	0	0%	27	26%	38	37%	39	38%
Grand Total	0	0%	116	29%	156	39%	133	33%

Distribution by Borrowers' Income within the Enid MSA

Small Business and Farm Loans

BOK's small business loan distribution performance in the Enid MSA from 1996 thru the date of this evaluation is good. A high percentage of these loans were to businesses with annual revenues less than \$1 million and had original amounts less than \$100 thousand. The following table reflects the distribution of BOK's 1996 and YTD 1997 small business loans in the Enid assessment area, by original loan amount and the gross annual revenues of the businesses and farms. For comparison, the chart also reflects the distribution, by gross annual revenues, of all small businesses and farms in the Enid MSA assessment area.

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within the Enid MSA Assessment Area By Loan Size and Business Revenues														
Loan Size					Annual Revenues < \$1 Million									
	#	%	\$ (000)	%	#	%*	\$ (000)	%*						
less than \$100,000	63	86%	\$1,552	31%	47	75%	\$1,015	65%						
\$100,000 to \$250,000	6	8%	\$1,005	20%	3	50%	\$480	48%						
\$250,000 to \$1,000,000	4	5%	\$2,392	48%	1	25%	\$495	21%						
Totals	73	100%	\$4,949	100%	51	70%	\$1,990	40%						
Distribution of Businesses and Farms in the Assessment Area by Annual Revenues of the Business or Farm:					<table> <tr> <td>< 1 Million</td> <td>73%</td> </tr> <tr> <td>> 1 Million</td> <td>8%</td> </tr> <tr> <td>Unknown</td> <td>19%</td> </tr> </table> <p>*As a percentage of loans of the size category</p>				< 1 Million	73%	> 1 Million	8%	Unknown	19%
< 1 Million	73%													
> 1 Million	8%													
Unknown	19%													

Home Mortgage Loans

The distribution of home mortgage loans among borrowers of different income levels is good. The following table reflects the distribution of BOK's HMDA reportable loans from 1995 through the date of this evaluation for the Enid MSA assessment area. For comparison, the chart also presents the distribution of all families living in the Enid MSA assessment area according to their income level.

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within the Enid MSA Assessment Area (Including BancOklahoma Mortgage Corp) By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	2,983	19%	2,984	19%	3,877	24%	6,071	38%
Loan Product	#	%	#	%	#	%	#	%
Home Purchase/Refi	26	10%	32	13%	62	25%	129	52%
Home Improvement	3	18%	2	12%	2	12%	10	59%
Total 1995	29	11%	34	13%	64	24%	139	52%
Home Purchase/Refi	6	7%	12	14%	24	29%	42	50%
Home Improvement	4	15%	0	0%	7	26%	16	59%
Total 1996	10	9%	12	11%	31	28%	58	52%
Home Purchase/Refi	2	8%	2	8%	6	25%	14	58%
Home Improvement	2	10%	1	5%	7	33%	11	52%
Total YTD 1997	4	9%	3	7%	13	29%	25	56%
Grand Total	43	10%	49	12%	108	26%	222	53%

Market share data for 1995 reflects that BOK is the leader among financial institutions originating HMDA reportable home mortgage loans to all borrowers and second among low- and moderate-income borrowers in the Enid MSA. This ranking exceeds BOK's presence in this market but is reflective of the bank's emphasis on mortgage lending in the state of Oklahoma. The following table illustrates 1995 home mortgage loan originations market share by income level of the borrower in the Enid MSA:

1995 Home Mortgage Loan Originations Market Share Within the Enid MSA Assessment Area (Including BancOklahoma Mortgage Corp) by Income Level of the Borrower									
Loan Product	All Borrowers			Low-Income Borrowers			Mod-Income Borrowers		
	#	% Mkt	Rank	#	% Mkt	Rank	#	% Mkt	Rank
Home Purchase/Refi	297	24.6%	1	26	26.5%	2	32	16.4%	2
Home Improvement	21	6.4%	5	3	7.0%	4	2	3.9%	6

Consumer Loans

The distribution of consumer loans among borrowers of different income levels in the Enid MSA assessment area is adequate. The distribution of loans is reasonably representative of the distribution of the residents in the assessment area with the same income level.

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within the Enid MSA Assessment Area By Income Level of the Borrower									
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income		
Characteristics of Families	2,983	19%	2,984	19%	3,877	24%	6,071	38%	
Characteristics of Households	5,187	23%	3,761	17%	4,495	20%	9,186	41%	
Loan Product	#	%	#	%	#	%	#	%	
Motor Vehicle Loans	7	10%	16	24%	23	34%	21	31%	
Credit Card Loans	5	38%	2	15%	2	15%	4	31%	
Home Equity Loans	0	0%	1	8%	2	17%	9	75%	
Other Secured Loans	0	0%	9	25%	5	14%	22	61%	
Other Unsecured Loans	7	17%	6	15%	7	17%	21	51%	
Total 1996	19	11%	34	20%	39	23%	77	46%	
Motor Vehicle Loans	3	12%	5	20%	6	24%	11	44%	
Credit Card Loans	0	0%	1	25%	2	50%	1	25%	
Home Equity Loans	1	4%	1	4%	3	12%	20	80%	
Other Secured Loans	0	0%	1	13%	3	38%	4	50%	
Other Unsecured Loans	0	0%	5	22%	5	22%	13	57%	
Total YTD 1997	4	5%	13	15%	19	22%	49	58%	
Grand Total	23	9%	47	19%	58	23%	126	50%	

Community Development Lending

BOK has made a low level of community development loans, based on the opportunities available within the Enid MSA assessment area. Based on information provided by BOK, only one community development loan has been made for \$350 thousand to refinance the mortgage on a low-income housing apartment complex. The loan benefits the Enid City MSA assessment area.

INVESTMENT TEST

The bank has a low level of qualified community investments in the Enid MSA assessment area. The bank has provided seven qualified investments/grants in the Enid assessment area totaling \$11,984. Investments/grants are below what would be anticipated, based on the number of deposits and loans provided from this area. Investments/grants have been provided to non-profit organizations in the Enid assessment area who serve the needs of the low- and moderate-income individuals/groups. These include the United Way of Enid, Salvation Army, New Horizons Counseling Center, and Junior Welfare League of Enid.

SERVICE TEST

Delivery systems are reasonably accessible to all portions of the assessment area. Delivery systems consist of two branches and two ATMs all of which are located in an upper-income census tract and one loan production office, located in a middle-income census tract. Branch openings and closings have been limited to the relocation of one branch from a middle income census tract to a retail supermarket located in an upper-income census tract.

No qualifying community development services have been performed. Community development services in the Enid assessment area are below that of BOK's general performance; however, it does not affect BOK's overall rating. A very high concentration of the bank's deposits and loans are derived from the Tulsa and Oklahoma City assessment areas; therefore those area receive additional emphasis when assessing service performance.

Nonmetropolitan Statewide Areas

Summary of Institution's Operations in the State of Oklahoma Nonmetropolitan Areas

BOK has delineated three assessment areas in nonmetropolitan areas of the state of Oklahoma. These include the Muskogee Region adjacent to the Tulsa MSA to the south, the Northeast Oklahoma (NEO) Region adjacent to the Tulsa MSA to the northeast and the Kay County Region adjacent to the Tulsa MSA to the northwest. None of these assessment areas represent major markets for BOK. However, BOK is a relatively large player in each of these markets.

BOK operates five full-service branches in the Muskogee Region which account for 3% of the bank's total loan portfolio and 6% of the bank's total deposits as of June 1997. These branches hold approximately 12% of the total commercial bank deposits in the region, placing them third among the commercial banks operating in the region. BOK has four ATMs in this region.

BOK operates six full-service branches in the NEO Region which account for 4% of the bank's total loan portfolio and 8% of the bank's total deposits as of June 1997. Four of the branches are located in the city of Bartlesville and two are located in the town of Grove. These branches hold approximately 12% of the total commercial bank deposits in the region, placing them second among the commercial banks operating in the region. BOK has nine ATMs in this region.

BOK operates two full-service branches in the Kay County Region which account for less than 1% of the bank's total loan portfolio and 1% of the bank's total deposits as of June 1997. These branches hold approximately 9% of the total commercial bank deposits in the region, placing them fourth among the commercial banks operating in the region. BOK has two ATMs in this region.

Description of the State of Oklahoma Nonmetropolitan Areas

The table provides a summary of demographic data for all three of the nonmetropolitan assessment areas combined. However, the paragraphs that follow the table discuss each assessment area individually.

Distribution of the Number of Businesses, Farms, Housing Units and Households Within the Nonmetropolitan Statewide Assessment Areas By Income Level of the Census Tracts								
Census Tracts	Low-Income		Mod-Income		Middle-Income		Upper-Income	
	1	1%	14	15%	58	62%	21	22%
Demographic Category	#	%	#	%	#	%	#	%
Businesses	328	3%	1,783	18%	5,891	59%	1,962	20%
Farms	2	1%	50	15%	212	64%	66	20%
1-4 Family Housing Units	249	0%	18,863	15%	77,128	60%	31,678	25%
Households	191	0%	19,505	15%	76,968	59%	34,321	26%
Distribution of the Families and Households Within the Nonmetropolitan Statewide Assessment Areas By Their Income Characteristics								
Families	18,855	20%	16,189	17%	19,044	20%	41,868	44%
Households	30,215	23%	19,649	15%	22,205	17%	58,916	45%

Muskogee Region

The Muskogee Region includes three counties with 36 census tracts. There are low- or moderate-income census tracts in each county. The total population for the area was reported at 125,438 in the 1990 U.S. Census, centered in the cities of Muskogee and McAlester. The 1990 U.S. Census median family income is \$24,139, and the 1996 HUD-updated median family income for the area is \$28,600. Approximately 45% of the households in the region receive social security or public assistance.

Approximately 81% of the housing units are occupied and 59% are owner occupied. The median housing value for the area is \$29,850 and the median year built is 1968. Approximately 25% of the total housing units are mobile homes or multifamily dwellings. The economic conditions in the Muskogee Region are stable. The predominant industries include manufacturing and agriculture.

We did not conduct any community contacts in this region and none were available for review.

Northeastern Oklahoma (NEO) Region

The NEO Region includes six counties with 47 census tracts. There are no low-income census tracts in this region and only three of the counties have moderate-income census tracts (Delaware, Ottawa and Washington). The 1990 U.S. Census population for this region was 164,159. The 1990 U.S. Census median family income is \$24,139, and the 1996 HUD-updated median family income for the area is \$28,600. Approximately 42% of the households in the region receive social security or public assistance.

Approximately 81% of the housing units are occupied and 62% are owner occupied. The median housing value for the area is \$36,400 and the median year built is 1968. The economic conditions in the NEO Region are stable. The predominant industries include agriculture, manufacturing, and petroleum.

A review of four community contacts conducted with persons living in the city of Bartlesville and the town of Grove revealed that the contacts generally believed that local banks were responsive to the areas credit needs. However, one person indicated a continuing need for home improvement loans and low-income housing.

Kay County Region

The Kay County Region includes one county with 11 census tracts. There are no low- or moderate-income census tracts in the region. The 1990 U.S. Census population of the region was reported at 48,056. Ponca City represents slightly more than 26,000 of this population. The 1990 U.S. Census median family income is \$24,139 and the 1996 HUD-updated median family income for the area is \$28,600. Approximately 38% of the households in the county receive social security or public assistance.

Approximately 84% of the housing units are occupied and 61% are owner occupied. The median housing value for the county is \$35,700 and the median year built is 1954. The economic conditions in Kay County are stable. The predominant industries include petroleum and the Ponca City public school system.

A review of four community contacts conducted with persons living in Ponca City and the town of Newkirk revealed that the contacts generally believed that local banks were responsive to the areas credit needs. However, two persons indicated a continuing need for affordable housing and small business loans.

Conclusions with Respect to Performance Tests in the State of Oklahoma Nonmetropolitan Areas

A substantial majority of BOK's deposits and loans are derived from the Tulsa MSA and Oklahoma City MSA assessment areas. Therefore, performance in these assessment areas was given significant emphasis in determining BOK's overall CRA rating. This section presents conclusions regarding BOK's CRA performance in the nonmetropolitan areas in contrast to its overall performance.

LENDING TEST

Lending Activity

BOK's lending activity in the state of Oklahoma nonmetropolitan assessment areas is below that noted bank wide. Internal records reflect a loan-to-deposit ratio for the nonmetropolitan areas to be less than 40%. An analysis of loan originations during the time period of this evaluation revealed that of all originations within the bank's assessment areas, 2% were made in the Muskogee Region assessment area, 3% were made in the NEO Region assessment area and 1% were made in the Kay County Region assessment area. Deposits from the Muskogee and NEO Regions represent a much greater share of BOK's total deposits at 6% and 8%, respectively. For the Kay County Region, the level of loan originations closely corresponds to the relationship of deposits taken from within that assessment area.

Geographic Distribution of Loans within the Nonmetropolitan Assessment Areas

Overall, the distribution of loans in the three nonmetropolitan assessment areas is consistent with performance in BOK's overall performance. The distribution reflects a good penetration of all income levels of census tracts. The tracts that had no loans were in remote portions of the assessment areas where no branches are located.

Market share ranking of 1995 HMDA reportable loans was not available for the nonmetropolitan assessment areas. Banks were not required to report loans made outside MSA's prior to 1996.

Distribution by Borrowers' Income within the Nonmetropolitan Assessment Areas

In general, the distribution of loans to businesses and individuals within the nonmetropolitan assessment areas is consistent with BOK's overall performance. However performance in certain instances, discussed below, was below that noted for the overall bank.

Although the bank maintains a sizeable financial presence in the Muskogee Region, only five percent of the bank's HMDA reportable loans since 1995 were made to low-income borrowers. The fact that slightly more than 23% of the families in the Muskogee Region assessment area are low-income families, suggests additional mortgage lending opportunities may be available.

BOK's performance in lending to small businesses in the Kay County Region assessment area lags the performance identified in the other nonmetropolitan assessment areas. Lending performance reports disclosed that only 50% of the business loans made by the bank since 1996 were to small businesses with gross annual revenues of less than \$1 million, despite the fact that almost 80% of the total businesses in the area report gross annual revenues of less than \$1 million.

Community Development Lending

No community development loans have been made in the Kay County Assessment Area since the last Performance Evaluation. Only one has been made in the Northeast Oklahoma Region Assessment Area for \$150 thousand to an agency that provides affordable housing and community services primarily for low- and moderate-income individuals.

BOK has made a relatively high level of community development loans in the Muskogee Region Assessment Area. Seven loans, totaling approximately \$7.4 million have been originated since February 1995. Four loans have been made to provide affordable housing to low- and moderate-income senior citizens in Eufala, McAlester, and Muskogee, and mentally disabled citizens in Muskogee. The other three loans are to agencies that provide community services primarily to low- and moderate-income individuals.

INVESTMENT TEST

The bank's level of qualified community investments in the nonmetropolitan assessment areas is low, and BOK has not been a leader in the development of investments in these areas. Innovative and/or complex investments are rarely used to support community development initiatives.

The bank has provided nine qualified investments/grants totaling \$17,110 in the nonmetropolitan assessment areas, which includes the Northeastern Oklahoma Region, Muskogee Region, and Kay County Region. Although the bank is responsive to community needs in these areas, investments/grants are significantly below what would be anticipated, based on the number of deposits provided from this area. Investments/grants have been provided to non-profit organizations in these assessment areas who serve the needs of the low- and moderate-income individuals/groups. These include the United Way of Bartlesville, Habitat for Humanity - Muskogee, and United Way of Ponca City, and Women and Children in Crisis - Bartlesville.

SERVICE TEST

Delivery systems are reasonably accessible to essentially all portions of the nonmetropolitan assessment areas given the significant territory included in these assessment areas. BOK has one branch and one ATM located in the one low-income census tract in these assessment areas. Also, there is one branch and one ATM located in a moderate-income census tract. These represent 16% and 14% of all branches and ATMs in the nonmetropolitan assessment areas, respectively, as compared to 15% of all households being located in low- or moderate-income census tracts. Other alternative delivery systems within the nonmetropolitan areas are the same as those identified for the overall bank. No branches have been closed in these assessment areas. One branch was opened in a large retail store in a middle-income census tract.

An adequate level of community development services have been provided but is below that of the overall bank. Due to these nonmetropolitan assessment areas being located in more rural and less populated areas of the state of Oklahoma, overall opportunities to perform services are more limited and the need for a large number of delivery systems (branches, ATMs, loan production offices) is not as great as in the metropolitan assessment areas.

Appendix A: Scope of Examination

Time Period Reviewed		
Lending Data: January 1, 1995 through May 31, 1997 Other Performance Criteria: February 9, 1995 through August 1, 1997		
Financial institution	Products reviewed	
Bank of Oklahoma, N.A., Tulsa, Oklahoma	Loans: Small Business; Small Farm; Consumer; Residential Mortgage; Home Improvement; and Community Development Other: Qualified Investments; Product Delivery Systems; and Community Development Services	
Affiliate	Products reviewed	
BancOklahoma Mortgage Corp (A subsidiary of the bank in 1995 and 1996 but merged into the bank effective January 1, 1997)	Mortgage Loans	
List of Assessment Areas and Type of Examination		
Assessment Areas	Type of Exam	Deposits Attributed to Area Branches as of June 1997
Metropolitan Statistical Areas:		Dollars (in Millions) - Percent
Tulsa , (MSA 8560)	on-site	1,748 59%
Oklahoma City , (MSA 5880)	on-site	720 24%
Enid , (MSA 2340)	on-site	66 2%
Nonmetropolitan Areas:		
Muskogee Region (Counties of McIntosh, Muskogee & Pittsburg)	on-site	166 6%
Northeastern Oklahoma Region (Counties of Craig, Delaware, Mayes, Nowata, Ottawa & Washington)	on-site	230 8%
Kay County Region	on-site	45 1%

Appendix B: Additional Tables

Table 1

Distribution of the Number of Businesses, Farms, Housing Units and Households Within All Assessment Areas By Income Level of the Census Tracts								
Census Tracts	Low-Income		Mod-Income		Middle-Income		Upper-Income	
	34	6%	156	25%	283	46%	145	23%
Demographic Category	#	%	#	%	#	%	#	%
Businesses	3,168	4%	19,708	27%	33,404	45%	17,626	24%
Farms	37	2%	323	20%	838	53%	392	25%
1-4 Family Housing Units	24,807	3%	169,545	24%	346,489	48%	174,627	24%
Households	24,520	3%	182,934	23%	391,747	49%	200,336	25%
Distribution of the Families and Households Within All Assessment Areas By Their Income Characteristics								
Families	14,847	3%	118,088	21%	281,460	50%	150,779	27%
Households	188,098	24%	127,954	16%	153,525	19%	329,944	41%

Table 2

Distribution of Small Business and Farm Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Census Tract								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	17	50%	86	55%	169	60%	114	79%
Number of Businesses	3,168	4%	19,708	27%	33,404	45%	17,626	24%
Number of Farms	37	2%	323	20%	838	53%	392	25%
Loan Product	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%
Small Business	\$8,187	6%	\$40,150	27%	\$60,559	41%	\$38,503	26%
Small Farm	\$25	2%	\$113	8%	\$861	58%	\$485	33%
Total 1996	\$8,212	6%	\$40,263	27%	\$61,420	41%	\$38,988	26%
Small Business	\$4,834	9%	\$16,746	31%	\$19,699	36%	\$13,131	24%
Small Farm	\$0	0%	\$0	0%	\$60	72%	\$23	28%
Total YTD 1997	\$4,834	9%	\$16,746	31%	\$19,759	36%	\$13,154	24%
Grand Total	\$13,046	6%	\$57,009	28%	\$81,179	40%	\$52,142	26%

Table 3

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within All Assessment Areas (Including BancOklahoma Mortgage Corp) By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	23	68%	134	86%	269	95%	142	98%
Number of 1-4 Family Units	24,807	3%	169,545	24%	346,489	48%	174,627	24%
Median Year Built of Housing	1953		1958		1966		1972	
Loan Product	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%
Home Purchase/Refi	\$647	0%	\$24,139	8%	\$114,155	36%	\$175,242	56%
Home Improvement	\$50	1%	\$706	11%	\$2,347	35%	\$3,596	54%
Total 1995	\$697	0%	\$24,845	8%	\$116,502	36%	\$178,838	56%
Home Purchase/Refi	\$834	0%	\$19,834	6%	\$137,452	39%	\$196,573	55%
Home Improvement	\$36	0%	\$1,029	12%	\$3,235	38%	\$4,264	50%
Total 1996	\$870	0%	\$20,863	6%	\$140,687	39%	\$200,837	55%
Home Purchase/Refi	\$111	0%	\$5,785	5%	\$46,188	39%	\$64,923	55%
Home Improvement	\$34	1%	\$835	16%	\$1,816	35%	\$2,448	48%
Total YTD 1997	\$145	0%	\$6,620	5%	\$48,004	39%	\$67,371	55%
Grand Total	\$1,712	0%	\$52,328	6%	\$305,193	38%	\$447,046	55%

Table 4

Distribution of Home Mortgage Loan Originations in 1995, 1996 and YTD 1997 Within All Assessment Areas (Including BancOklahoma Mortgage Corp) By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	113,297	20%	99,514	18%	125,020	22%	227,359	40%
Loan Product	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%
Home Purchase/Refi	\$7,632	3%	\$28,187	11%	\$60,058	23%	\$167,543	64%
Home Improvement	\$211	3%	\$777	12%	\$949	15%	\$4,541	70%
Total 1995	\$7,843	3%	\$28,964	11%	\$61,007	23%	\$172,084	64%
Home Purchase/Refi	\$8,550	2%	\$34,943	10%	\$74,746	22%	\$225,200	66%
Home Improvement	\$477	6%	\$693	9%	\$1,733	21%	\$5,204	64%
Total 1996	\$9,027	3%	\$35,636	10%	\$76,479	22%	\$230,404	66%
Home Purchase/Refi	\$3,372	3%	\$12,807	11%	\$25,548	22%	\$73,449	64%
Home Improvement	\$193	4%	\$540	11%	\$749	15%	\$3,546	71%
Total YTD 1997	\$3,565	3%	\$13,347	11%	\$26,297	22%	\$76,995	64%
Grand Total	\$20,435	3%	\$77,947	11%	\$163,783	22%	\$479,483	65%

Table 5

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Census Tracts								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Census Tracts	34	6%	156	25%	283	46%	145	23%
Census Tracts Penetrated (% of tracts in income group)	33	97%	143	92%	262	93%	141	97%
Number of Households	24,520	3%	182,934	23%	391,747	49%	200,336	25%
Loan Product	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%
Motor Vehicle Loans	\$916	2%	\$8,664	19%	\$20,744	44%	\$16,446	35%
Credit Card Loans	\$9	0%	\$261	12%	\$894	41%	\$1,038	47%
Home Equity Loans	\$207	1%	\$1,884	8%	\$7,483	32%	\$13,454	58%
Other Secured Loans	\$132	0%	\$2,605	9%	\$9,594	34%	\$16,165	57%
Other Unsecured Loans	\$2,328	4%	\$13,350	22%	\$24,353	40%	\$21,610	35%
Total 1996	\$3,592	2%	\$26,764	17%	\$63,068	39%	\$68,713	42%
Motor Vehicle Loans	\$170	1%	\$2,124	17%	\$5,293	41%	\$5,196	41%
Credit Card Loans	\$1	0%	\$112	9%	\$364	30%	\$725	60%
Home Equity Loans	\$64	0%	\$889	4%	\$7,692	33%	\$14,730	63%
Other Secured Loans	\$99	1%	\$1,032	10%	\$3,736	37%	\$5,269	52%
Other Unsecured Loans	\$86	1%	\$1,460	10%	\$4,771	31%	\$9,015	59%
Total YTD 1997	\$420	1%	\$5,617	9%	\$21,856	35%	\$34,935	56%
Grand Total	\$4,012	2%	\$32,381	14%	\$84,924	38%	\$103,648	46%

Table 6

Distribution of Consumer Loan Originations in 1996 and YTD 1997 Within All Assessment Areas By Income Level of the Borrower								
Assessment Area Data	Low-Income		Mod-Income		Middle-Income		Upper-Income	
Characteristics of Families	113,297	20%	99,514	18%	125,020	22%	227,359	40%
Characteristics of Households	188,074	24%	127,975	16%	153,525	19%	329,944	41%
Loan Product	\$(000)	%	\$(000)	%	\$(000)	%	\$(000)	%
Motor Vehicle Loans	\$3,832	8%	\$9,576	21%	\$11,444	25%	\$21,103	46%
Credit Card Loans	\$186	9%	\$251	12%	\$519	24%	\$1,226	56%
Home Equity Loans	\$333	1%	\$1,022	5%	\$2,348	10%	\$18,888	84%
Other Secured Loans	\$594	3%	\$1,439	7%	\$2,735	13%	\$15,856	77%
Other Unsecured Loans	\$838	5%	\$1,155	7%	\$1,837	12%	\$11,625	75%
Total 1996	\$5,783	5%	\$13,443	13%	\$18,883	18%	\$68,698	64%
Motor Vehicle Loans	\$1,305	10%	\$2,583	20%	\$3,128	25%	\$5,664	45%
Credit Card Loans	\$79	7%	\$166	14%	\$280	23%	\$677	56%
Home Equity Loans	\$495	3%	\$1,247	7%	\$2,743	15%	\$14,041	76%
Other Secured Loans	\$86	2%	\$233	4%	\$479	9%	\$4,830	86%
Other Unsecured Loans	\$557	4%	\$886	6%	\$1,947	13%	\$11,799	78%
Total YTD 1997	\$2,522	5%	\$5,115	10%	\$8,577	16%	\$37,011	70%
Grand Total	\$8,305	5%	\$18,558	12%	\$27,460	17%	\$105,709	66%