



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**First National Bank Alaska
Charter Number: 12072**

**101 West 36th Avenue
Anchorage, AK 99503**

Office of the Comptroller of the Currency

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

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS	2
DESCRIPTION OF INSTITUTION.....	5
SCOPE OF THE EVALUATION.....	6
FAIR LENDING REVIEW	7
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	8
LENDING TEST	8
INVESTMENT TEST.....	14
SERVICE TEST	16
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

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

The following table indicates the performance level of **First National Bank Alaska** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank Alaska Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- An excellent geographic distribution of HMDA lending in the Anchorage MSA.
- An excellent distribution of small loans to businesses by borrower income.
- A high level of community development lending responsive to the needs of the bank's assessment area.
- A good level of community development investment.
- An excellent distribution of branches and ATMs throughout the bank's assessment areas.
- A high level of community development service.

Definitions and Common Abbreviations

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

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

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

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

First National Bank Alaska (FNBA) is the largest independently owned bank in Alaska. It is an intrastate bank that has no affiliates. The bank is headquartered in Anchorage, with a significant amount of its business activity and facilities concentrated in that MSA.

The bank was founded in 1922 and operates as a full service bank, providing an array of financial services to the communities it serves. FNBA operates 27 branches and 34 ATMs in ten assessment areas. Additionally, the bank operates another 13 ATMs located in the state of Alaska outside of its assessment areas. Services offered by the bank include a variety of deposit account products, loan products, safe deposit boxes, night depositories, drive-up facilities, and an Internet site. The bank also offers Trust and Private Banking services. FNBA continues to enhance its products and services to help meet the diverse needs of the communities it serves. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. For a more detailed description of products and services please see the Service Test part of this Performance Evaluation.

As of September 2004, FNBA reported total assets of \$2.2 billion. Total loans were \$1.1 billion, total deposits were \$1.5 billion, and net Tier 1 Capital was \$435 million. It is important to note that FNBA's capital is more than twice the average for peer banks, and its earnings are significantly above peer group averages. These financial indicators show a good capacity for CRA performance. But, the bank's extremely high amount of capital distorts any comparison of its CD loans and investments to its net Tier 1 capital, by making its percentages of loans and investments seem low in relation to other banks. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment areas.

The strategic focus of FNBA is to become the primary bank for a majority of the businesses in its market. This focus on commercial lending is reflected in the breakdown of FNBA's loan portfolio. About 38% of gross loans are secured by commercial real estate; 23% are commercial and industrial loans; 21% are construction and development loans; 9% are secured by 1-4 family residential real estate; 4% are secured by multifamily residential real estate; 2.5% are credit card, home equity, or individual loans and less than 1% are agricultural loans. Three other strategic goals are to improve services to rural parts of Alaska, upgrade facilities, and increase efficiency.

Institutions that endeavor to serve financial needs throughout the State of Alaska encounter special challenges. Those challenges are embedded in the unique geographic, climatic, and demographic characteristics of the state. The rural population is spread out over a vast expanse of territory that includes remote islands and peninsulas. Basic infrastructure is lacking in most rural areas. There are no road systems connecting many towns and villages. Transportation and communication costs are high. Climatic conditions can be extreme in much of the state, further hampering the movement of people and goods. The operational cost of delivering even basic financial services through an ATM to a remote town or village that is only accessible by boat or small airplane can be prohibitive. And it is impractical to establish branches in most of the remote towns and villages.

FNBA was last examined under the CRA using performance information through September 24, 2001 and was rated "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation assesses the bank's performance from July 1, 2001 through December 6, 2004. HMDA and CRA reportable lending activity from July 1, 2001 through December 31, 2003 was evaluated. We considered all Community Development, Investment Test, and Service Test information from July 1, 2001 through June 30, 2004. Home purchase, home refinance, small business, and community development loans were reviewed in conjunction with the Lending Test. Additionally, any special loan programs offered by the bank were included in our analysis to the extent appropriate. The Investment Test focused on review of qualifying investments, grants, and donations. Community development services, retail banking locations, and retail banking services were reviewed in connection with the Service Test. The bank did not submit optional consumer loan information for consideration, so optional Table 13 was not included in Appendix C. For more information about the scope of this evaluation please refer to Appendix A.

Data Integrity

We reviewed the bank's system of internal controls to ensure the integrity of its loan reporting process. The review found that FNBA's internal controls, which include extensive loan data testing procedures, are satisfactory. The bank's publicly reported HMDA and CRA loan data is accurate. The accuracy of FNBA's investment, service, and community development data was verified during this CRA examination.

Selection of Areas for Full-Scope Review

FNBA operates primarily in ten assessment areas in Alaska. One assessment area is comprised of the Anchorage MSA and the other nine are noncontiguous full or partial boroughs in rural Alaska. We selected the Anchorage MSA for a full-scope review and the nine Non-MSA areas for a limited scope review. The Anchorage assessment area is the most important assessment area to the bank's operations. FNBA's CRA performance in Anchorage is substantially representative of its overall performance. See Appendix B for a complete description of the Anchorage MSA assessment area.

To provide a better understanding of the scope of FNBA's assessment area, we have provided tables and market profiles on all of the rural assessment areas. However, the majority of FNBA's loans and deposits are derived from the Anchorage assessment area.

Ratings

The bank's overall rating is based primarily on the assessment area that received a full-scope review. In general, the performance in each assessment area is weighted according to the percentage of loans and deposits in that area. Therefore, FNBA's performance in the Anchorage assessment Area carries the most weight in developing the overall conclusions for the bank.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Anchorage assessment area is excellent.

Lending Activity

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

Overall, FNBA's lending activity in HMDA and CRA reportable loans is considered good. Considering the large numbers of lenders operating in the market without a branch or deposit taking presence, the bank consistently ranks in lending equal to its ranking in deposit share. In addition to its level of HMDA and small business loans, the bank has an exceptionally high volume of community development loans. This overall good level of lending activity had a positive effect upon our overall conclusion about the bank's performance under the Lending Test.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home Purchase

Home purchase lending in the Anchorage AA is excellent. The percentage of FNBA's loans in low- and moderate-income census tracts exceeded the demographics. FNBA's market share in low- and moderate-income census tracts exceeded FNBA's overall market share. In 2002, the bank's lending in low-income census tracts as well as its market share was slightly less than the demographics and its overall market share.

The bank exceeded peer for lending in moderate-income census tracts. Lending volumes were too low in low-income census tracts for peer analysis.

Home Improvement

Home improvement lending is an insignificant component of the bank's overall lending and not part of their lending strategy.

Refinance

Home Mortgage Refinance Lending in the Anchorage AA is good. The percentage of FNBA's loans to low-income census tracts exceeded the demographics in 2003, but was below the demographics for moderate-income census tracts in 2003 and low- and moderate-income census tracts in 2002. The bank exceeded its overall market share for loans to low income census tracts in 2003, but was less than its overall market share for loans to low-and moderate-income census tracts in 2002.

The bank was slightly below peer for lending in moderate-income census tracts and above peer for lending in low-income census tracts.

Multifamily

Multifamily mortgage lending in the Anchorage AA is excellent. The percentage of FNBA's multifamily loans in low- and moderate-income census tracts exceeded the demographics of those tracts in 2002. In 2003, the bank exceeded the demographics in low-income tracts but was less than the demographics in moderate-income tracts. The bank exceeded its overall market share for lending to low-and moderate-income census tracts in 2002. The bank exceeded its overall market share for lending to low-income tracts in 2003. However, its market share of loans to moderate-income census tracts was less than its overall market share in 2003.

The bank exceeded peer for lending in low- and moderate-income census tracts.

Small Loans to Businesses

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

The geographic distribution of small loans to business in the Anchorage AA is good.

The bank's small loans to businesses in the low- and moderate-income census tracts in 2002 and 2003 were less than the demographics of those tracts. However, the largest share of the bank's loans was in middle-income census tracts where the largest percentage of businesses with revenues of less than \$1 million is located. The bank's lending in low- and moderate-income census tracts exceeded the demographics of businesses with revenues of less than \$1 million located in those tracts.

The bank's market share of loans in low- and moderate-income census tracts was less than its overall market share in 2003. In 2002, the bank's market share was below its overall market share in moderate-income census tracts but above it overall market share in low -income census tracts.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The bank is not a significant lender of small loans to farms.

Lending Gap Analysis

Maps and reports detailing FNBA's lending activity over the evaluation period for small loans to businesses, home purchase loans, and home refinance loans were reviewed to identify gaps in the geographic distribution. No unexplained conspicuous gaps were identified. Two geographies, one low-income and one moderate-income, were not penetrated by small business, small farm and HMDA loans. Both of those geographies are comprised primarily of military bases where there is virtually no owner-occupied housing, small businesses or farms and therefore little demand for such loans. The absence of unexplained gaps in the bank's lending had a positive effect on our conclusion about the geographic distribution of FNBA's lending activity.

Inside/Outside Ratio

Virtually all of the home purchase loans, refinance loans, loans to small businesses, and CD loans originated or purchased by FNBA over the evaluation period were within its assessment areas. 100% of the HMDA loans, 99% of the small loans to businesses and farms, and 100% of CD loans were made to borrowers within the bank's assessment areas or within the State of Alaska. This excellent performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Home Mortgage

FNBA's distribution of home mortgage loans to borrowers of different income levels is excellent. In 2003, the bank's loans to low and moderate-income borrowers exceeded the demographics. In 2002, the bank's loans to moderate-income borrowers exceeded the demographics although loans to low-income borrowers were less than the percentage of low-income borrowers in the AA.

FNBA's market share of loans to low- and moderate-income borrowers exceeded the bank's overall market share in 2002 and 2003.

The bank exceeded peer in its lending to low- and moderate-income borrowers in 2002 and 2003.

Home Improvement

The bank's home improvement loans are an insignificant part of its overall lending.

Home Mortgage Refinance Loans

FNBA's distribution of Home Mortgage Refinance Loans to borrowers of difference income levels is good. In 2003 and 2002, the bank's percentage of loans to low income borrowers was less than the demographics. The bank's percentage of loans to moderate-income borrowers exceeded the demographics in 2003 and was less than the demographics in 2002.

The bank 's market share to low- and moderate-income borrowers in 2003 and to moderate-income borrowers in 2002 exceeded its overall market share. The bank's market share to low-income borrowers in 2003 was less than its overall market share.

The bank exceeded peer in lending to low- and moderate-income borrowers in 2002 and 2003.

A large portion of the bank's potential low- and moderate-income customers have taken advantage of state subsidized home mortgage programs that have resulted in very low interest, low down payment loans for these borrowers. Because of the below market interest rate and low equity of these existing mortgages, the demand for refinancing of loans by borrowers that had previously taken advantage of these program is soft.

Small Loans to Businesses

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

FNBA's distribution of small loans to business by the income of the borrowers is excellent. In 2002 and 2003, the bank's percentage of loans to businesses with revenues of less than \$1 million exceeded the percentage of those businesses in the Anchorage AA.

The bank's market share of loans to businesses with revenues of less than \$1 million exceeded its overall market share.

The bank far exceeded peer in lending to businesses with revenues of less than \$1 million.

Small Loans to Farms

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

The bank is not a significant lender of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

FNBA made an excellent amount of CD loans during the evaluation period. The bank's total CD loans equal 28% of allocated net Tier 1 capital, indicating a significant commitment of funds to meet community needs, particularly in light of the bank's high capital levels. For perspective, it must be noted that FNBA's capital levels are more than twice the average level of its peer. The level of community development lending is very responsive to the needs of the community. This had a positive effect upon our conclusions about the bank's performance under the Lending Test.

The bank has risen to be a leader in community development lending with a total dollar volume of qualified loans during the evaluation period of over \$121 million. These 79 loans to 55 different organizations represented nearly 28% of FNBA's Tier One Capital and provided funds for community service projects, revitalization of low and moderate-income geographies and numerous housing units for low and moderate-income individuals. 51 loans totaling \$93 million were originated in the Anchorage MSA. 24 loans totaling \$19 million were originated in non-metropolitan assessment areas outside of Anchorage. The remaining four loans totaling \$9 million were for projects within the state of Alaska that are outside of the bank's delineated assessment area. Because the bank sought to identify assessment areas that were of a reasonable size given the physical locations of their branches, there are huge sparsely populated geographical areas that are not part of the bank's assessment area but nevertheless are served by the bank. These loans are not included in the tables, but are given the same weight as loans within the assessment area.

Many of the loans were considered complex due to the nature of the collateral and the structure of the financing. Projects were responsive to identified needs of the communities. Some descriptions of the projects representative of FNBA's community development lending follow:

- A letter of credit to back a remote city's bulk fuel station and energy facility. The native city provides power to several smaller communities in the arctic as well as fuel. Bulk fuel stations are a high priority in the Denali Commissions current programs as they reduce expense to communities and the likelihood of spills is reduced as the number of fuel stations is reduced in rural Alaska.
- A loan to renovate a portion of an abandoned strip mall falling into disrepair in the Anchorage Renaissance Zone into an office building for a large furniture store. The store will bring employment opportunities to the community as well as meet the city's goal of seeing the property renovated. This loan is part of a multi-layered financial transaction to complete the renovation and sale of this downtrodden eyesore in the middle of town.

- A loan to convert a 48-unit townhouse type apartment complex in Fairbanks, Alaska to affordable condominiums. Each of the units will be sold at an affordable cost of \$110,000 to \$127,000 which is substantially lower than the average home in Fairbanks.

It should be noted, that in addition to the loans mentioned and several other community development loans reported, FNBA provided several loans that supported the spirit of community development which were reported within its small business lending numbers. These include loans for affordable housing, support of community services and revitalization of low and moderate-income geographies.

Product Innovation and Flexibility

FNBA uses numerous flexible-lending practices in a safe and sound manner to address the credit needs of low and moderate-income persons and geographies. These practices enhance the bank's lending performance.

FNBA has developed a reputation within the State of Alaska, and the nation, as a bank that can provide housing in remote rural communities to low and very low-income individuals. Several of the bank's reportable loans were focused on this program. While most of these deals were outside of the bank's assessment area, they still merit remark for their focus on impoverished communities in Alaska. Many of these deals are considered in the Investment Test. Most of these loans focus on teacher housing in rural Alaska or housing for village public safety officers. Other loans support small native village organizations in providing community services, including energy, health services and public welfare programs. FNBA received a national Community Partnership Award for their work in rural Alaska.

FNBA also demonstrates flexible practices through the use of the following programs:

92 loans, totaling over \$8.6 million dollars, were booked to low and moderate-income families throughout Alaska using combinations of affordable housing programs.

The bank also participates in several business lending programs that support small businesses in the state of Alaska. They include loans supported through the Small Business Administration, Bureau of Indian Affairs, Alaska Industrial Development and Export Authority, Rural Development Initiative Fund, Rural Development (USDA) and Title VI loan programs tied to NAHASDA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the non-metropolitan areas is not inconsistent with the bank's overall outstanding performance under the lending test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Anchorage MSA is good.

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

First National Bank Alaska's performance under the Investment Test is rated "High Satisfactory." The bank's performance in the Anchorage MSA is good based on the number and dollar volume of investments relative to available opportunities, community needs, and positive impact in the AA.

During the evaluation period, the bank has one qualifying investment plus numerous grants and donations in the Anchorage MSA, totaling \$6.3 million. In addition to current period investments, the bank had \$463,000 in investments on the books that were made during prior CRA evaluation periods. Total current and prior period investments and donations represented 1.5% of Tier 1 capital. In addition to investments in the Anchorage MSA, the bank made significant investments in areas that benefit residents throughout the state of Alaska. Because the bank sought to identify assessment areas that were of a reasonable size given the physical locations of their branches, there are huge sparsely populated geographical areas that are not part of the bank's assessment area but nevertheless are served by the bank. Since investments in these areas directly impact their customers, we have included them in the investments for evaluation. The bank made seven investments and numerous grants and donations totaling \$8.8 million in the areas outside of the assessment areas but within the State of Alaska. The bank also had \$496,000 in prior period investments on the books that, in addition to the current period investments and donations, represented an additional 2.15% Tier 1 capital.

FNBA's investments exhibit good responsiveness to the credit and community development needs of the assessment area, particularly the need for affordable housing. In the Anchorage MSA, more than \$5.7 million or 91% of these investments helped to finance affordable housing or provide affordable housing services for low- and moderate-income families. These affordable housing investments primarily consist of federally sponsored low-income housing tax credits and local housing development bonds. Since affordable housing is an important need identified by government agencies and community groups, FNBA's investments are considered highly responsive to those needs. As such, they had a positive impact upon the community.

Throughout the Anchorage MSA area, there is a great need for affordable housing. Examples of the types of the largest qualified investments the bank made in this assessment area during the evaluation period to address affordable housing needs include the following:

First Time Homebuyers Mortgage Revenue Bonds - These bonds were issued to fund the tax exempt First Time Homebuyers Program offered through the Alaska Housing Finance

Corporation (AHFC). The program has income limits that are favorable to low- to moderate-income persons, veterans, and those living in rural areas throughout Alaska. During 1999, the AHFC provided financing for 2,181 first time homebuyers through a \$200 million bond issue. Of the \$4.2 million the bank invested in these statewide bonds, approximately \$2.4 million directly benefited the Anchorage MSA.

Housing Development Bonds - These bonds are general obligations issued by the AHFC to provide long-term financing to various affordable housing organizations in Alaska for affordable housing projects targeted to low- and moderate-income families. The bank initially invested \$1.79 million in these bonds in 1983, of which approximately \$210,000 matured during the evaluation period. Proceeds of the bonds were used for the purchase of five apartment building projects in the City of Anchorage. Collectively, the projects provided 111 units of affordable housing.

Low-Income Housing Tax Credits (LIHTC) - The LIHTC program was created by the Tax Reform Act of 1986. States were given the authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income families. The bank initially invested \$2.6 million in these tax credits during 1995 and 1996. Proceeds of the tax credit facilities were used to construct two apartment buildings in the City of Anchorage, which provided 65 low-income housing units. As of our evaluation date, the outstanding balances of these tax credits from prior years totaled \$1.33 million, which reflect the recognition of tax benefits over the years.

Conclusions for Area Receiving Limited-Scope Reviews

Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

Based on a limited-scope review, the bank's performance under the Investment Test in the non-MSA area is stronger than the bank's overall "High Satisfactory" performance. The bank made \$6.8 million in grants, donations and current and prior period investments in the limited scope assessment areas. A significant amount of the funds invested in the limited-scope area helped create or rehabilitate affordable housing. Other investments helped finance small business development activities, and community and educational services targeted at LMI persons in the Non-MSA area. They were responsive to identified needs. This performance had a positive effect on the overall Investment Test rating and represented 1.56% of Tier 1 capital.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

First National Bank of Alaska's performance under the Service Test is rated "Outstanding." Based on a full-scope review, the bank's performance in the Anchorage MSA assessment area is excellent.

Retail Banking Services

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

FNBA has an excellent distribution of branches that are located throughout the Anchorage MSA. FNBA's distribution of branches in low- and moderate-income census tracts exceeds the percentage of the population living in both low- and moderate-income tracts, thus providing convenient accessibility to most residents in those tracts. No branches were opened or closed in Anchorage during the evaluation period. Lobby hours are reasonable and there are no significant differences in hours for branches in LMI geographies compared to those in middle- and upper-income geographies.

FNBA also provides 46 automated teller machines (ATMs) throughout the state of Alaska, 32 of which are inside of its assessment area. 25 of these are deposit-taking machines. The distribution of ATMs in low- and moderate-income tracts exceeds the percentage of the population living in low- and moderate- tracts and demonstrates FNBA's commitment to serving low and moderate-income geographies. During the evaluation period, one ATM was closed in a low-income census tract, one ATM was closed in a moderate-income census tract and one ATM was opened in a moderate-income census tracts. The ATM closures did not adversely impact the low- or moderate-income population of those tracts.

Because the towns and villages outside of the Anchorage MSA serve as hubs for a widely dispersed population, the branches and ATM's in the middle and even upper income census tracts are considered accessible to the population. Because of the concentration of income in the villages and towns, the only areas suitable for a branch and ATM location may be the middle or upper income census tracts.

Providing banking services throughout the state of Alaska offers unique challenges for banks in the state. Populations are spread out over vast areas that encompass many towns and villages. FNBA has made strides to serve these areas by providing postage paid, Bank by Mail service, BusinessLink, Direct Deposit services, Bank on Line and an extensive ATM network. In addition, many of FNBA's staff fly or boat to villages to provide services, particularly in the Bethel area. Every effort is made to accommodate clients who are in hub cities infrequently, including extended hours on appointment if necessary. It is not unusual for bank managers to use boats, planes and snowmobiles to meet with clients in the greater Alaska service area.

With a focus on rural banking, FNBA has continued its ATM services in remote villages within the state. During the examination period 14 ATM's were located in villages throughout the most rural areas of Alaska. This network continues to expand, providing cash services to villages that were either underserved or completely unserved by financial institutions due to location. The ATM's allow access to government payments and deposit accounts at any financial institution. Most of these locations can only be reached by air or boat. There are no road systems connecting the villages and travel is challenging at best and nearly impossible during the worst months of winter.

The bank developed First Accounts and Electronic transfer Accounts (ETA) with input from the US Treasury for use in rural Alaska. FNBA is the only bank to offer the First Account, an account focused on individuals with a need for checking services, but are comfortable with limited transactions at reduced or no cost.

The incomes of customers using these alternative delivery systems are not tracked; therefore we could not place significant weight on the alternative delivery systems when drawing conclusions about the Service Test.

The community relations officer and a loan officer travel frequently to villages to assist in providing services as part of the bank's investment focus as well. Assistance can be in the form of advice on provision of government documents to meet NAHASDA guidelines or the provision of grant writing assistance to support housing construction and sale. FNBA's mortgage staff travels to these villages as well, to assist future homeowners in developing application packets. These services were designed specifically to assist low and moderate-income geographies and people throughout the state of Alaska.

FNBA provides bilingual services at several offices and via phone. These languages include Samoan, Sign Language, Tagalog, Spanish, Bengali, Hindi, German, Spanish, Chinese, French, Dutch, Ilocano and Yup'ik. The bank advertises in some communities in one form or another of these languages to address specific community needs.

The bank's business hours are structured to accommodate customer's needs. 12 of the branches have Saturday hours and rural branches accommodate clients by appointment traveling to hub areas for service.

Community Development Services

FNBA offers a very high level of services that are specific to a majority of people and organizations within the assessment area. They have focused their community development services on building the capacity and infrastructure necessary to support economic development and affordable housing throughout its assessment areas and the state as a whole.

FNBA provides housing program development counseling to Alaska Native housing authorities through their Community Development Office. Because FNBA is a leader in the nation, primary training revolves around the use of the Title VI program which allows a village or tribe to borrow up to five times their annual IHBG allotment from a bank, with a 95% HUD Guarantee on the debt. Debt can be structured to coincide with the annual receipt of IHBG funds and can be amortized for up to 20 years. These funds are restricted to housing

programs serving LMI native populations. The bank is also the lead bank in the state of Alaska using Federal Home Loan Bank (FHLB) grant programs. Development and preplanning of the grant application process begins during these sessions as well.

The majority of villages in Alaska have a need for housing. Some 15,000 homes are necessary to alleviate the shortage. FNBA meets with individual housing authorities as well as providing group training, up to two years in advance of construction efforts. The bank assists the villages in putting together their Indian Housing Plan, which is required by HUD for all assisted housing stock maintained by native housing authorities. The plan addresses future housing needs, including homeownership, rental units and assisted housing for elders or those with special housing requirements.

Significant financial counseling is required to develop a feasible housing plan. Many of the smaller native housing entities do not have the staff necessary to manage this on their own. The bank assists with this by providing grant counseling as well as options for debt financing available not only through the bank, but also through residential programs offered by HUD, USDA Rural Development and other providers. The final outcome of this counseling is most often a housing program structured around non-debt instruments, but the goal is to assist the housing authority in their efforts to develop the ability to pursue debt instruments down the road for additional housing needs.

FNBA has taken a leadership role in its use of FHLB funds within the state including:

- ◆ FNBA administered \$3 million in FHLB funds awarded in the state of Alaska since 1998. This is the majority of funds issued to the state during the examination period. Included in the programs under bank administration is the largest AHP grant ever issued to Alaska as well as the largest per unit grant ever issued by any FHLB program in the nation. These two programs won national awards for their innovative structuring.
- ◆ FNBA enrolled 44 first time homebuyers in the Home\$tart program during the examination period. Each enrollee will receive \$5,000 in matching funds for down payment and closing costs to purchase their first home. Three of the enrollees will receive an additional \$5,000 from a pilot program FHLB asked the bank to take part in which funds individuals below 60% area median income who are referred to the bank by nonprofit agencies. Only a handful of banks in the nation were asked to participate in the nonprofit set aside program.

In addition to the work with FHLB of Seattle, FNBA completed 3,552 hours of community development services throughout its assessment area. Some of these are as follows:

- ◆ 155 hours of work with Anchorage Neighborhood Housing Services, a program designed to assist low-to-moderate-income homebuyers find funds and prepare for the process of applying for, and maintaining the home they intend to purchase.
- ◆ 180 hours with AASC serving as a board member on a housing program designed for low-income individuals experiencing disabilities.
- ◆ 136 hours with Assets, Inc. serving as a board member on a program designed to integrate people experiencing developmental disabilities or mental illnesses that need substantial support into the community via work programs, housing, and community services.

- ◆ 443 hours administering and assisting villages and clients with application and administration of AHP grant programs.
- ◆ 23 hours assisting the Alaska IDA network in their planning process for the implementation of IDA programs in the state of Alaska.

In addition to these community development services, bank employees representing the bank provide credit counseling, credit education and homebuyer counseling through seminars at community centers throughout the assessment areas. Employees also serve as board members and financial advisors on non-profit, tribal and government organizations that serve low-and-moderate-income geographies and people, promote economic revitalization, provide affordable housing and provide business education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the non-metropolitan areas is not inconsistent with the bank's overall "Outstanding" performance under the Service Test. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 7/1/2001 – 12/31/2003 Investment and Service Tests and CD Loans: July 1, 2001 to 06/30/2004	
Financial Institution	Products Reviewed	
First National Bank Alaska (FNBA) Anchorage, Alaska	HMDA, Small Loans to Business and Farms, Community Development Loans, Services and Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Anchorage MSA	Full Scope	
Bethel Fairbanks Haines Juneau Kenai Kodiak Mat Su Sitka Valdez Cordova	Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Anchorage MSA	B-2
Bethel Non-Metropolitan Area.....	B-4
Fairbanks Non-Metropolitan Area.....	B-6
Haines Non-Metropolitan Area.....	B-7
Juneau Non-Metropolitan Area	B-9
Kenai Non-Metropolitan Area	B-11
Kodiak Non-Metropolitan Area.....	B-13
Matanuska Susitna (MatSu) Non-Metropolitan Area.....	B-14
Sitka Non-Metropolitan Area	B-15
Valdez Cordova Non-Metropolitan Area.....	B-17

Market Profiles for Areas Receiving Full-Scope Reviews

Anchorage MSA

Demographic Information for Full Scope Area: FNBA Anchorage						
Demographic Characteristics	#	Low % Of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts BNAs)	55	1.82	32.73	41.82	23.64	0.00
Population by Geography	260,283	1.31	30.34	42.87	25.48	0.00
Owner-Occupied Housing by Geography	56,933	0.51	18.28	47.17	34.04	0.00
Business by Geography	22,506	2.72	36.65	39.90	20.73	0.00
Farms by Geography	282	0.00	21.63	48.23	30.14	0.00
Family Distribution by Income Level	64,833	19.33	17.89	23.81	38.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,130	1.90	44.54	41.33	12.23	0.00
Median Family Income		63,682	Median Housing Value		140,815	
HUD Adjusted Median Family Income for 2003		73,600	Unemployment Rate (1990 US Census)		3.50%	
Households Below Poverty Level		6.39%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Anchorage assessment area as all of the MSA, minus the one non-designated census tract in the MSA. This includes essentially all of Anchorage Borough, located in south central Alaska. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Anchorage is located in south central Alaska at the head of Cook Inlet. It is three hours' flight time from Seattle. Anchorage, Alaska's largest city, is the state's center of commerce. The Port of Anchorage, the Ted Stevens International Airport, and the Alaska Railroad combine to make Anchorage the primary cargo distributor in the state. Anchorage is the headquarters for many firms in the oil and gas, finance, real estate, transportation and communications industries. Numerous visitor and tourist facilities and services are available throughout the Municipality. More than 10,000 military personnel are stationed at Fort Richardson and Elmendorf Air Force Base. During the 1970s, the development of the Prudhoe Bay oil fields and the Trans-Alaska Pipeline sparked rapid growth in Anchorage. Population, office space and housing tripled within a 10-year period. Anchorage is gradually becoming less industrialized and is broadening its economic landscape with more retail trade and a larger service sector to primarily serve tourists. Other economic opportunities include construction, light manufacturing, high technology, software development and seafood processing. The increases in employment from tourism have offset the employment losses in the agriculture, mining, manufacturing, and commercial fishing industries. Unemployment rates in Anchorage have always been considerably lower than the Alaska average due to the diversified Anchorage economy.

The Anchorage MSA is the largest assessment area that the bank serves. As demonstrated by the data in the Tables in Appendix C, this assessment area contains a significant concentration of the bank's facilities, and it generates a high percentage of the bank's loans

and deposits. The financial services sector is highly competitive, with local and national financial service providers active in the market. Aggregate reported loan data for 2003 in the Anchorage MSA shows that 205 lenders made HMDA loans and 39 lenders made small business loans. As of June 30, 2004, five FDIC-insured institutions held a total of \$2.5 billion in deposits, with FNBA ranking second.

The city designated an Anchorage Renaissance Zone to focus development and redevelopment activity.

There are a variety of organizations working in the Anchorage MSA to meet community development needs. There are community development corporations, community development financial institutions, nonprofits, government agencies, private foundations, charities, churches, medical facilities, and others serving the community. These entities work in the areas of affordable housing, small business development, emergency relief, education, vocational training, counseling, health care, and others. There are also a number of loan programs available through public and private venues to serve community needs. We updated the community contacts of the last evaluation and confirmed that the demand for affordable housing still outstrips the supply and there is still a need for a variety of programs targeted at Native Americans. This suggests there is opportunity for financial institutions to engage in community development activities. However, the capacity of most of the rural communities to originate community development projects and activities that financial institutions can participate in is severely limited therefore, partnership and capacity building activities are highly valued in these communities.

Bethel Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Bethel						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1	0.00	0.00	100.00	0.00	0.00
Population by Geography	5,471	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	752	0.00	0.00	100.00	0.00	0.00
Business by Geography	96	0.00	0.00	100.00	0.00	0.00
Farms by Geography	1	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	1,155	22.25	15.67	16.19	45.89	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	438	0.00	0.00	100.00	0.00	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Bethel assessment area as all but two census tracts that are composed of rural communities scattered throughout very large landmasses with no road system connecting them to Bethel. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Bethel AA shows that ten lenders made HMDA loans and 14 lenders made small business loans. As of June 30, 2004, two FDIC-insured institutions held a total of \$69 million in deposits, with FNBA ranking second.

Bethel is located at the mouth of the Kuskokwim River, 40 miles inland from the Bering Sea. It lies in the Yukon Delta National Wildlife Refuge, 400 air miles west of Anchorage. The community was moved to its present location due to erosion at the prior site. A post office was opened in 1905. Before long, Bethel was serving as a trading, transportation and distribution center for the region, which attracted Natives from surrounding villages. The City was incorporated in 1957. Over time, federal and state agencies established regional offices in Bethel. The region is fortunate in that rapid development did not occur before the importance of protecting the Native culture was realized. The traditional Yup'ik Eskimo practices and language remain predominant in the area. Subsistence activities and commercial fishing are major contributors to residents' livelihoods. The sale of alcohol is banned in the community, although importation or possession is allowed.

Bethel serves as the regional center for 56 villages in the Yukon-Kuskokwim Delta. Food, fuel, transportation, medical care, and other services for the region are provided by Bethel. Fifty percent of the jobs in Bethel are in government positions. Commercial fishing is an important source of income; 200 residents hold commercial fishing permits, primarily for salmon and herring roe net fisheries. Subsistence activities contribute substantially to villagers diets, particularly salmon, freshwater fish, game birds and berries. Poor fish returns since 1997 have

significantly affected the community.

The State-owned Bethel Airport is the regional transportation center, and is served by a number of passenger airlines, cargo carriers, and numerous air taxi services. Bethel is the third busiest airport in Alaska. It offers a 6,398' long by 150' wide asphalt runway and 1,850' long by 75' wide gravel crosswind runway, and is currently undergoing a \$7 million renovation and expansion. Two float plane bases are nearby, Hangar Lake and H Marker Lake. The Port of Bethel includes a small boat harbor, dry land storage, and up to 5,000 feet of transient moorage on the seawall. River travel is the primary means of local transportation in the summer, and it becomes a 150-mile ice road to surrounding villages in the winter. A barge service based in Bethel provides goods to the Kuskokwim villages. There are 16 miles of graded dirt roads maintained by the City and 22 miles of paved roads maintained by the State DOT. Winter trails are marked to Napakiak (1.1 mi.) and Akiachak (19 mi.)

Fairbanks Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Fairbanks						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	6.25	68.75	25.00	0.00
Population by Geography	68,931	0.00	6.23	67.22	26.55	0.00
Owner-Occupied Housing by Geography	15,686	0.00	2.86	67.77	29.37	0.00
Business by Geography	6,685	0.00	5.80	71.70	22.50	0.00
Farms by Geography	81	0.00	1.23	61.73	37.04	0.00
Family Distribution by Income Level	17,163	15.78	14.74	22.64	46.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,237	0.00	11.38	69.62	19.00	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Fairbanks assessment area as all but three census tracts in the Fairbanks Borough. These tracts are composed of military bases and reservation land adjacent to the bases. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Fairbanks AA shows that 95 lenders made HMDA loans and 23 lenders made small business loans. As of June 30, 2004, six FDIC-insured institutions held a total of \$ 761 million in deposits, with FNBA ranking fourth.

The Fairbanks North Star Borough is located in the heart of Interior Alaska, and is the second-largest population center in the state. Fairbanks lies 45 minutes by air from Anchorage and three hours from Seattle. City, Borough, State and federal government agencies, including the military, provide over one-third of the employment in the Borough. The Borough School District and the University of Alaska Fairbanks are the primary public employers. Approximately 6,000 residents are military. Retail services, gold mining, tourism, transportation, medical, and other services are the primary private sector activities. The Fort Knox hard rock gold mine produces 1,200 ounces daily with 360 permanent year-round employees. 142 borough residents hold commercial fishing permits.

The Richardson Highway, the Parks Highway, the Steese Highway and the Elliott Highway connect the Interior to Anchorage, Canada and the lower 48. Truck, rail and air services provide transportation of cargo. Scheduled jet services are available at Fairbanks International airport. An 11,800' asphalt runway, heliport and seaplane landing strip are available. A public seaplane base is located on the Chena River. Eielson Air Force Base and Fort Wainwright also conduct flight operations in the area.

Haines Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Haines						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1	0.00	0.00	100.00	0.00	0.00
Population by Geography	2,392	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	691	0.00	0.00	100.00	0.00	0.00
Business by Geography	410	0.00	0.00	100.00	0.00	0.00
Farms by Geography	7	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	649	27.27	17.10	23.11	32.51	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	288	0.00	0.00	100.00	0.00	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Haines assessment area as the one census tract comprising the Haines Borough. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Haines AA shows that 14 lenders made HMDA loans and 14 lenders made small business loans. As of June 30, 2004, FNBA was the only deposit taking institution in the borough with total deposits of \$25 million.

Haines is located on the western shore of Lynn Canal, between the Chilkoot and Chilkat Rivers. It is 80 air miles northwest of Juneau, just south of the Canadian border at British Columbia, and 600 air miles southeast of Anchorage and Fairbanks. By road, it is 775 miles from Anchorage. Expansion of the timber industry in the early 1970s fueled growth. The sawmills closed in 1976. In 2002, the City was consolidated with the Haines Borough. The Chilkat Bald Eagle Preserve, located 18 miles from Haines, is a major attraction in Southeast Alaska.

Commercial fishing, timber, government, tourism, and transportation are the primary employers. 128 area residents hold commercial fishing permits. Many jobs are seasonal. Tourism and the traffic Haines draws as a result of its road connection to the State Ferry are important. Approximately 45,000 cruise ship passengers visit yearly. The Chilkat Bald Eagle Preserve draws visitors from around the world.

Haines is a major trans-shipment point because of its ice-free, deep-water port and dock, and year-round road access to Canada and Interior Alaska on the Haines and Alaska Highways. It is a northern terminus of the Alaska Marine Highway System, a cruise ship port-of-call, and a hub for transportation to and from southeast Alaska. Haines has a State-owned 4,000' long by 100' wide paved runway, with daily scheduled flights to Juneau by small aircraft. There is also

a state-owned seaplane base, two small boat harbors with a total of 240 moorage slips, a state ferry terminal, and a cruise ship dock. Freight arrives by ship, barge, plane and truck.

Juneau Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Juneau						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	5	0.00	0.00	60.00	40.00	0.00
Population by Geography	25,414	0.00	0.00	53.12	46.88	0.00
Owner-Occupied Housing by Geography	6,119	0.00	0.00	47.33	52.67	0.00
Business by Geography	3,495	0.00	0.00	67.01	32.99	0.00
Farms by Geography	49	0.00	0.00	63.27	36.73	0.00
Family Distribution by Income Level	6,412	10.90	14.63	20.59	53.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,637	0.00	0.00	62.68	37.32	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Juneau assessment area as all but one census tract in the Juneau Borough. The excluded census tract is a marine tract. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Juneau AA shows that 68 lenders made HMDA loans and 19 lenders made small business loans. As of June 30, 2004, five FDIC-insured institutions held a total of \$566 million in deposits, with FNBA ranking third.

Located on the mainland of Southeast Alaska, opposite Douglas Island, Juneau was built at the heart of the Inside Passage along the Gastineau Channel. It lies 900 air miles northwest of Seattle and 577 air miles southeast of Anchorage. Fishing, canneries, transportation and trading services, and a sawmill contributed to Juneau's growth through the early 1900s. The A-J Mine closed in 1944, after producing over \$80 million in gold. In 1970, the City of Juneau and City of Douglas were unified into the City & Borough of Juneau. As the state capital, Juneau is supported largely by State and Federal employment, and by tourists cruising the Inside Passage. It is the third largest community in Alaska. About one-third of residents live downtown or on Douglas Island; the remaining two-thirds live elsewhere along the areas accessible by road.

The State, City & Borough of Juneau, and federal agencies provide nearly 45% of the employment in the community. Juneau is home to State Legislators and their staff during the legislative session between January and May. Tourism is a significant contributor to the private sector economy during the summer months, providing a \$130 million income and nearly 2,000 jobs. Over 690,000 visitors arrive by cruise ship, and another 100,000 independent travelers visit Juneau each year. The Mendenhall Glacier, Juneau Ice field air tours, Tracy Arm Fjord Glacier, State Museum, and Mount Roberts Tramway are local attractions. Support services for logging and fish processing contribute to the Juneau

economy, and 519 residents hold commercial fishing permits. DIPAC, a private non-profit organization, operates a fish hatchery that increases the local salmon population. The Kennecott Green's Creek Mine produces gold, silver, lead and zinc, and is the largest silver mine in North America.

Juneau is accessible only by air and sea. Scheduled jet flights and air taxis are available at the Municipally-owned Juneau International Airport. The airport includes a paved 8,457' long by 150' wide runway and a seaplane landing area. Marine facilities include a seaplane landing area at Juneau Harbor, two deep draft docks, five small boat harbors and a State ferry terminal. The Alaska Marine Highway System and cargo barges provide year-round services.

Kenai Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Kenai						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	12	0.00	0.00	100.00	0.00	0.00
Population by Geography	49,454	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	13,518	0.00	0.00	100.00	0.00	0.00
Business by Geography	5,853	0.00	0.00	100.00	0.00	0.00
Farms by Geography	114	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	12,686	21.47	17.44	22.85	38.24	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,936	0.00	0.00	100.00	0.00	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Kenai assessment area as all but one census tract in the Kenai Borough. The tract is an uninhabited part of the borough. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Kenai AA shows that 85 lenders made HMDA loans and 24 lenders made small business loans. As of June 30, 2004, three FDIC-insured institutions held a total of \$435 million in deposits, with FNBA ranking second.

The Kenai Peninsula Borough is comprised of the Kenai Peninsula, Cook Inlet and a large unpopulated area northeast of the Alaska Peninsula. The Borough includes portions of the Chugach National Forest, the Kenai National Wildlife Refuge, the Kenai Fjords National Park, and portions of the Lake Clark and Katmai National Park. The twin cities of Kenai and Soldotna are the population centers of the Borough, approximately 65 air miles south of Anchorage. It was the site of the first major Alaska oil strike, in 1957, and has been a center for exploration and production since that time. The Borough was incorporated as a second-class borough in 1964.

The natural beauty and recreational activities have led to a growing tourism industry with a well-developed list of attractions including world famous Kenai River, the Alaska SeaLife Center, the Challenger Learning Center, art galleries, and millions of acres of public forests. The Borough economy is highly diverse. Many residents are employed in services for Cook Inlet oil and natural gas drilling and exploration. Oil refining operations occur north of Kenai in Nikiski. Both in-state and out-of-state visitors provide a significant industry on the Peninsula. Other important economic sectors include sport, subsistence and commercial fishing, fish processing, government, timber and lumber, agriculture, transportation, services, construction and retail trade. 1,555 borough residents hold commercial fishing permits, which allow fishing for salmon, herring, cod, bottom fish such as halibut, and shellfish. Harvesting of spruce bark

beetle-killed timber also occurs as value-added processes are implemented.

Kenai is accessible by the Sterling Highway to Anchorage, Fairbanks, Canada and the lower 48 states. Scheduled and charter airlines and helicopter services are provided. Both Homer and Seward have developed deepwater docks. The Nikiski industrial area has 4 additional private docking facilities for tankers, ocean-going freighters, and other marine transportation. The State Ferry serves Homer.

Kodiak Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Kodiak						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	3	0.00	0.00	66.67	33.33	0.00
Population by Geography	10,017	0.00	0.00	34.25	65.75	0.00
Owner-Occupied Housing by Geography	1,859	0.00	0.00	28.03	71.97	0.00
Business by Geography	705	0.00	0.00	49.50	50.50	0.00
Farms by Geography	41	0.00	0.00	34.15	65.85	0.00
Family Distribution by Income Level	2,298	15.06	14.23	20.41	50.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	673	0.00	0.00	32.84	67.16	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Kodiak assessment area as all but two census tracts in the Kodiak Borough. These are a marine tract and a tract that is inaccessible to the town of Kodiak. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Kodiak AA shows that 30 lenders made HMDA loans and 17 lenders made small business loans. As of June 30, 2004, three FDIC-insured institutions held a total of \$130 million in deposits, with FNBA ranking second.

Kodiak Island is located on the eastern side of the Gulf of Alaska. It lays 252 air miles south of Anchorage, a 55-minute flight, and is a three hour flight from Seattle. Since the Aleutian Campaign of World War II, several branches of the military have maintained a presence in Kodiak. The 1960s brought growth in commercial fisheries and fish processing. The Borough was incorporated in 1963. The Coast Guard comprises a significant portion of the Borough.

Fishing, fish processing, retail, services and the health care industries are the key employers. The Coast Guard, City, Borough, State and federal agencies also provide employment. 767 borough residents hold commercial fishing permits. Subsistence activities and sport fishing are prevalent. The Kodiak Launch Complex, a \$38 million low-Earth orbit launch facility on 27 acres, was recently completed at Cape Narrow near Chiniak.

Kodiak is accessible by air and sea. Airports and seaplane facilities serve air traffic island-wide. The Alaska Marine Highway System operates a ferry service from Seward and Homer. Two boat harbors serve commercial and transient vessels. Approximately 140 miles of state roads connect island communities on the east side of the island.

Matanuska Susitna (MatSu) Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Mat Su						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	0.00	70.00	30.00	0.00
Population by Geography	52,287	0.00	0.00	72.87	27.13	0.00
Owner-Occupied Housing by Geography	13,928	0.00	0.00	72.54	27.46	0.00
Business by Geography	4,270	0.00	0.00	74.17	25.83	0.00
Farms by Geography	97	0.00	0.00	78.35	21.65	0.00
Family Distribution by Income Level	13,412	18.25	15.94	23.25	42.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,586	0.00	0.00	78.41	21.59	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its MatSu assessment area as all but three census tracts in the MatSu Borough. These tracts are part of the Denali National Park or a mountain range and are inaccessible to bank facilities. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the MatSu AA shows that 106 lenders made HMDA loans and 20 lenders made small business loans. As of June 30, 2004, four FDIC-insured institutions held a total of \$229 million in deposits, with FNBA ranking second.

The Borough is comprised of the farmlands of the Matanuska and Susitna Valleys, approximately 42 miles northeast of Anchorage. Matanuska-Susitna Borough is located in the Palmer, Anchorage, and Talkeetna Recording District. Borough residents enjoy a more rural lifestyle close to metropolitan Anchorage. Low housing costs, the rural lifestyle, and a reasonable commute to Anchorage for employment and services has made the Mat-Su Borough one of the fastest growing areas of Alaska in recent years.

The economy is diverse, and residents are employed in a variety of retail, professional services, city, borough, state and federal occupations. Top employers are Mat-Su Schools, Valley Hospital, Wal-Mart, Carrs/Safeway and Fred Meyer. About one-third of the Borough's labor force commutes to Anchorage for employment. 244 borough residents hold commercial fishing permits.

The area accesses both the Glenn and George Parks Highways. Commercial airlines serve the nearby Anchorage International Airport, but a local municipal airport supports private and chartered services. The Alaska Railroad provides for delivery of ocean freight.

Sitka Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Sitka						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2	0.00	0.00	100.00	0.00	0.00
Population by Geography	8,835	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	1,905	0.00	0.00	100.00	0.00	0.00
Business by Geography	1,087	0.00	0.00	100.00	0.00	0.00
Farms by Geography	30	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	2,245	12.87	15.95	24.63	46.55	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	647	0.00	0.00	100.00	0.00	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Sitka assessment area as all tracts in the Sitka Borough. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Sitka AA shows that 36 lenders made HMDA loans and 17 lenders made small business loans. As of June 30, 2004, four FDIC-insured institutions held a total of \$113 million in deposits, with FNBA ranking third.

Sitka is located on the west coast of Baranof Island fronting the Pacific Ocean, on Sitka Sound. An extinct volcano, Mount Edgecumbe, rises 3,200 feet above the community. It is 95 air miles southwest of Juneau, and 185 miles northwest of Ketchikan. Seattle, Washington lies 862 air miles to the south. Sitka is located in the Sitka Recording District.

The U.S. Coast Guard now maintains the air station and other facilities on the Island. A large pulp mill began operations at Silver Bay in 1960. In 1971, the City and Borough governments were unified. Sitka offers abundant resources and a diverse economy. Sitka has year-round access to outdoor recreation in the Gulf of Alaska and Tongass National Forest.

The economy is diversified with fishing, fish processing, tourism, government, transportation, retail, and health care services. Cruise ships bring over 200,000 visitors annually. Five hundred eighty-six residents hold commercial fishing permits and fish processing provides seasonal employment. Sitka Sound Seafood and the Seafood Producers Co-op are major employers. Regional health care services, the U.S. Forest Service and the U.S. Coast Guard also employ a number of residents.

The State-owned Rocky Gutierrez Airport on Japonski Island has a 6,500' long by 150' wide paved and lighted runway, an instrument landing system, and a 24-hour FAA Flight Service

Station. Daily jet service is provided, and several scheduled air taxis, air charters and helicopter services are available. The City and Borough operate five small boat harbors with 1,350 stalls, and a seaplane base on Sitka Sound, at Baranof Warm Spring Bay. The Alaska Marine Highway system has a docking facility. The fast ferry M/V Fairweather serves Sitka twice a week with a six hour run to Juneau. Freight arrives by barge and cargo plane.

Valdez Cordova Non-Metropolitan Area

Demographic Information for Limited Scope Area: FNBA Valdez Cordova						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2	0.00	0.00	50.00	50.00	0.00
Population by Geography	6,964	0.00	0.00	35.61	64.39	0.00
Owner-Occupied Housing by Geography	1,733	0.00	0.00	33.99	66.01	0.00
Business by Geography	644	0.00	0.00	13.98	86.02	0.00
Farms by Geography	19	0.00	0.00	47.37	52.63	0.00
Family Distribution by Income Level	1,759	12.85	13.59	19.22	54.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	465	0.00	0.00	37.20	62.80	0.00
Median Family Income		55,219	Median Housing Value		121,381	
HUD Adjusted Median Family Income for 2003		64,800	Unemployment Rate (1990 US Census)		5.14%	
Households Below Poverty Level		9.75%				

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

Source: 1990 US Census and 2003 HUD updated MFI

The bank has defined its Valdez Cordova assessment area as all but one census tract in the Valdez Cordova Census Area. The tract is a group of national parks. The assessment area complies with regulatory guidelines and does not arbitrarily exclude any low- or moderate-income areas.

Aggregate reported loan data for 2003 in the Valdez Cordova AA shows that 23 lenders made HMDA loans and 16 lenders made small business loans. As of June 30, 2004, two FDIC-insured institutions held a total of \$95 million in deposits, with FNBA ranking second.

Valdez is located on the north shore of Port Valdez, a deep-water fjord in Prince William Sound. It lies 305 road miles east of Anchorage, and 364 road miles south of Fairbanks. It is the southern terminus of the Trans-Alaska oil pipeline. During the 1970s, construction of the Trans-Alaska oil pipeline terminal and other cargo transportation facilities brought rapid growth to Valdez. In March 1989, it was the center for the massive oil-spill cleanup after the "Exxon Valdez" disaster. In a few short days, the population of the town tripled.

As a result of significant oil taxation revenues, the City offers a variety of quality public services. Valdez has one of the highest municipal tax bases in Alaska as the southern terminus and off-loading point of oil extracted from Prudhoe Bay on the North Slope. Four of the top ten employers in Valdez are directly connected to the oil terminus. Alyeska Pipeline Service Co. employs nearly 300 persons. Valdez is a major seaport, with a \$48 million cargo and container facility. City, state, and federal agencies combined provide significant employment. 42 residents hold commercial fishing permits. Three fish processing plants operate in Valdez, including Peter Pan and Seahawk Seafoods. Valdez Fisheries Dev. Assoc. will open its year-round processing facility in October 2003. Seven cruise ships will dock in Valdez in 2004. Valdez is a Foreign Free Trade Zone.

The Richardson Highway connects Valdez to Anchorage, Fairbanks and Canada. Port Valdez is ice-free year round and is navigated by hundreds of ocean going oil cargo vessels each year. The State Ferry provides transport to Whittier, Cordova, Kodiak, Seward and Homer in the summer; Cordova only in the winter. Valdez has the largest floating concrete dock in the world, with a 1,200' front and water depth exceeding 80'. Numerous cargo and container facilities are present in Valdez. A small harbor accommodates 546 commercial fishing boats and recreational vessels. Boat launches and haul-out services are available. Both barges and trucking services deliver cargo to the City. The airport is operated by the state, with a 6,500' long by 150' wide paved runway, instrument landing system and control tower. A State-owned seaplane base is available at Robe Lake.

Cordova is located at the southeastern end of Prince William Sound in the Gulf of Alaska. The community was built on Orca Inlet, at the base of Eyak Mountain. It lies 52 air miles southeast of Valdez and 150 miles southeast of Anchorage. Cordova has a significant Eyak Athabaskan population with an active Village Council. Commercial fishing and subsistence are central to the community's culture.

Cordova supports a large fishing fleet for Prince William Sound and several fish processing plants. 343 residents hold commercial fishing permits, and nearly half of all households has someone working in commercial harvesting or processing. Copper River red salmon, pink salmon, herring, halibut, bottom fish and other fisheries are harvested. Reduced salmon prices have affected the economy. The largest employers are North Pacific Processors, Cordova School District, Cordova Hospital, the City, and the Department of Transportation. The U.S. Forest Service and the U.S. Coast Guard maintain personnel in Cordova.

Cordova is accessed by plane or boat. It is linked directly to the North Pacific Ocean shipping lanes through the Gulf of Alaska. It receives year-round barge services and State Ferry service. The Merle K. "Mudhole" Smith Airport at mile 13 is State-owned and operated, with a 7,499' long by 150' wide asphalt runway and 1,875' long by 30' wide gravel crosswind runway. The State-owned and City-operated Cordova Municipal Airport has a 1,800' long by 60' wide gravel runway. Daily scheduled jet flights and air taxis are available. Floatplanes land at the Lake Eyak seaplane base or the boat harbor. Harbor facilities include a breakwater, dock, a small boat harbor with 850 berths, boat launch, boat haul-out, a ferry terminal, and marine repair services. A 48-mile gravel road provides access to the Copper River Delta to the east. Plans for a highway up the Copper River to connect with the statewide road system have been controversial.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also

presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage

distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: Anchorage AA												
Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
FNBA Anchorage	45.74	1,370	202,571	2,753	310,153	8	796	31	34,919	4,162	548,439	61.23
Limited Review:												
FNBA Bethel	0.75	48	6,573	17	3,148	0	0	3	45	68	9,766	1.81
FNBA Fairbanks	16.02	323	38,314	1,128	92,920	2	350	5	999	1,458	132,583	5.67
FNBA Haines	1.75	76	7,437	68	3,512	15	339	0	0	159	11,288	1.65
FNBA Juneau	2.62	123	17,759	112	9,279	3	90	0	0	238	27,128	6.10
FNBA Kenai	14.76	446	57,004	882	78,913	15	851	0	0	1,343	136,768	10.16
FNBA Kodiak	1.85	93	13,730	59	6,390	16	1,108	0	0	168	21,228	2.68
FNBA Mat Su	11.44	486	64,411	552	49,537	1	55	2	371	1,041	114,374	5.95
FNBA Sitka	2.33	118	19,262	80	6,584	14	569	0	0	212	26,415	2.15
FNBA Valdez Cordova	2.76	105	12,859	116	9,665	30	944	0	0	251	23,468	2.61

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2001 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Anchorage AA				Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans					
Full Review:															
FNBA Anchorage	329	34.56	2.04	2.43	11.22	15.50	45.83	46.20	40.91	35.87	1.82	3.90	1.88	1.80	1.74
Limited Review:															
FNBA Bethel	24	2.52	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	28.21	0.00	0.00	28.21	0.00
FNBA Fairbanks	105	11.03	0.00	0.00	7.10	20.00	47.52	42.86	45.38	37.14	8.14	0.00	16.95	6.96	7.61
FNBA Haines	18	1.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	68.75	0.00	0.00	68.75	0.00
FNBA Juneau	27	2.84	0.00	0.00	0.00	0.00	48.40	33.33	51.60	66.67	4.91	0.00	0.00	2.46	6.75
FNBA Kenai	144	15.13	0.00	0.00	5.62	3.47	76.74	74.31	17.64	22.22	20.73	0.00	27.27	19.73	23.68
FNBA Kodiak	35	3.68	0.00	0.00	0.00	0.00	35.19	22.86	64.81	77.14	14.94	0.00	0.00	3.23	21.43
FNBA Mat Su	195	20.48	0.00	0.00	6.78	6.15	85.44	89.74	7.78	4.10	10.68	0.00	28.57	10.30	7.55
FNBA Sitka	37	3.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.94	0.00	0.00	14.94	0.00
FNBA Valdez Cordova	38	3.99	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	15.58	0.00	0.00	0.00	15.58

* Based on 2002 Peer Mortgage Data (WE1)

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FNBA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans						
Full Review:																
FNBA Anchorage	15	60.00	2.04	0.00	11.22	0.00	45.83	66.67	40.91	33.33	2.00	0.00	0.00	3.03	1.27	
Limited Review:																
FNBA Bethel	1	4.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	4	16.00	0.00	0.00	7.10	0.00	47.52	25.00	45.38	75.00	4.48	0.00	0.00	3.57	6.06	
FNBA Haines	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	0	0.00	0.00	0.00	0.00	0.00	48.40	0.00	51.60	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kenai	0	0.00	0.00	0.00	5.62	0.00	76.74	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kodiak	1	4.00	0.00	0.00	0.00	0.00	35.19	0.00	64.81	100.00	0.00	0.00	0.00	0.00	0.00	
FNBA Mat Su	1	4.00	0.00	0.00	6.78	0.00	85.44	100.00	7.78	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Sitka	2	8.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	1	4.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (WE1)

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans						
Full Review:																
FNBA Anchorage	975	45.69	2.04	0.62	11.22	6.97	45.83	43.90	40.91	48.51	5.08	4.00	4.53	4.95	5.31	
Limited Review:																
FNBA Bethel	23	1.08	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	26.00	0.00	0.00	26.00	0.00	
FNBA Fairbanks	202	9.47	0.00	0.00	7.10	5.45	47.52	48.02	45.38	46.53	10.70	0.00	9.09	11.07	10.55	
FNBA Haines	58	2.72	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	70.59	0.00	0.00	70.59	0.00	
FNBA Juneau	95	4.45	0.00	0.00	0.00	0.00	48.40	50.53	51.60	49.47	8.23	0.00	0.00	9.01	7.51	
FNBA Kenai	297	13.92	0.00	0.00	5.62	3.03	76.74	77.10	17.64	19.87	16.23	0.00	8.70	15.31	21.43	
FNBA Kodiak	56	2.62	0.00	0.00	0.00	0.00	35.19	44.64	64.81	55.36	20.20	0.00	0.00	26.03	16.80	
FNBA Mat Su	283	13.26	0.00	0.00	6.78	6.71	85.44	85.16	7.78	8.13	8.50	0.00	35.14	7.92	8.55	
FNBA Sitka	79	3.70	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.40	0.00	0.00	19.40	0.00	
FNBA Valdez Cordova	66	3.09	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	26.44	0.00	0.00	0.00	26.44	

* Based on 2002 Peer Mortgage Data (WE1)

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
FNBA Anchorage	51	66.23	12.71	21.57	44.62	49.02	35.17	15.69	7.49	13.73	40.00	66.67	76.47	19.05	18.75	
Limited Review:																
FNBA Bethel	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	12	15.58	0.00	0.00	39.45	50.00	50.70	41.67	9.85	8.33	80.00	0.00	71.43	100.00	100.00	
FNBA Haines	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	1	1.30	0.00	0.00	0.00	0.00	78.12	100.00	21.88	0.00	100.00	0.00	0.00	100.00	0.00	
FNBA Kenai	5	6.49	0.00	0.00	1.02	0.00	90.37	60.00	8.61	40.00	40.00	0.00	0.00	25.00	100.00	
FNBA Kodiak	1	1.30	0.00	0.00	0.00	0.00	43.89	0.00	56.11	100.00	100.00	0.00	0.00	0.00	100.00	
FNBA Mat Su	7	9.09	0.00	0.00	0.74	0.00	91.70	85.71	7.56	14.29	62.50	0.00	0.00	57.14	100.00	
FNBA Sitka	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (WE1)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
FNBA Anchorage	2,753	47.74	5.64	5.59	25.97	21.36	41.00	41.01	27.39	32.04	13.70	14.74	11.88	14.55	17.22	
Limited Review:																
FNBA Bethel	17	0.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.38	19.05	0.00	47.62	0.00	
FNBA Fairbanks	1,128	19.56	0.00	0.00	28.03	7.27	44.44	79.17	27.53	13.56	20.67	0.00	7.50	33.14	15.79	
FNBA Haines	68	1.18	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	28.35	0.00	0.00	49.32	0.00	
FNBA Juneau	112	1.94	0.00	0.00	0.00	0.00	67.49	65.18	32.51	34.82	5.46	0.00	0.00	5.58	8.27	
FNBA Kenai	882	15.29	0.00	0.00	3.33	1.25	85.35	86.73	11.31	12.02	21.15	50.00	7.89	31.04	25.49	
FNBA Kodiak	59	1.02	0.00	0.00	0.00	0.00	53.73	50.85	46.27	49.15	6.78	0.00	0.00	9.04	8.66	
FNBA Mat Su	552	9.57	0.00	0.00	0.93	6.52	90.96	79.17	8.11	14.31	14.23	1.41	34.58	18.97	27.78	
FNBA Sitka	80	1.39	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.94	0.00	0.00	12.40	0.00	
FNBA Valdez Cordova	116	2.01	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	15.68	0.00	7.89	0.00	34.57	

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans						
Full Review:																
FNBA Anchorage	8	7.69	3.37	0.00	16.10	0.00	45.32	25.00	35.21	75.00	23.08	0.00	0.00	33.33	28.57	
Limited Review:																
FNBA Bethel	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	2	1.92	0.00	0.00	16.46	0.00	46.84	50.00	36.71	50.00	16.67	0.00	0.00	0.00	20.00	
FNBA Haines	15	14.42	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00	
FNBA Juneau	3	2.88	0.00	0.00	0.00	0.00	66.67	33.33	33.33	66.67	28.57	0.00	0.00	0.00	66.67	
FNBA Kenai	15	14.42	0.00	0.00	6.25	13.33	84.82	80.00	8.93	6.67	24.32	0.00	66.67	24.14	0.00	
FNBA Kodiak	16	15.38	0.00	0.00	0.00	0.00	35.56	37.50	64.44	62.50	33.33	0.00	0.00	31.58	35.71	
FNBA Mat Su	1	0.96	0.00	0.00	0.00	0.00	88.66	100.00	11.34	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Sitka	14	13.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	31.25	0.00	0.00	31.25	0.00	
FNBA Valdez Cordova	30	28.85	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	73.68	0.00	0.00	0.00	73.68	

^{*} Based on 2002 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
FNBA Anchorage	329	34.56	20.01	20.67	17.99	18.67	22.35	21.67	39.65	39.00	1.78	5.23	2.12	1.38	1.61	
Limited Review:																
FNBA Bethel	24	2.52	23.62	4.17	13.19	8.33	21.56	16.67	41.63	70.83	28.21	100.00	0.00	14.29	30.00	
FNBA Fairbanks	105	11.03	19.22	16.35	17.03	25.00	21.53	22.12	42.22	36.54	9.00	41.18	19.12	8.24	5.47	
FNBA Haines	18	1.89	20.89	16.67	18.30	22.22	22.18	27.78	38.63	33.33	68.75	100.00	66.67	100.00	62.50	
FNBA Juneau	27	2.84	10.89	0.00	12.96	7.69	24.15	26.92	52.00	65.38	4.73	0.00	4.35	2.74	5.62	
FNBA Kenai	144	15.13	18.38	3.62	15.26	16.67	21.48	29.71	44.88	50.00	21.33	14.29	20.83	24.72	20.48	
FNBA Kodiak	35	3.68	12.54	5.71	12.87	8.57	25.65	25.71	48.94	60.00	15.48	0.00	0.00	14.29	19.61	
FNBA Mat Su	195	20.48	18.43	5.32	15.98	22.87	24.14	36.70	41.45	35.11	11.16	19.23	16.42	11.93	8.60	
FNBA Sitka	37	3.89	13.77	8.33	18.07	19.44	23.37	27.78	44.79	44.44	14.81	0.00	40.00	19.23	10.00	
FNBA Valdez Cordova	38	3.99	13.18	0.00	8.68	11.11	19.03	25.00	59.11	63.89	16.22	0.00	66.67	33.33	8.93	

* Based on 2002 Peer Mortgage Data (WE1)

** As a percentage of loans with borrower income information available. No information was available for 4.9% of loans originated and purchased by bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
FNBA Anchorage	15	60.00	20.01	0.00	17.99	23.08	22.35	23.08	39.65	53.85	1.85	0.00	3.39	0.98	1.95	
Limited Review:																
FNBA Bethel	1	4.00	23.62	0.00	13.19	0.00	21.56	0.00	41.63	100.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	4	16.00	19.22	0.00	17.03	25.00	21.53	25.00	42.22	50.00	4.69	0.00	14.29	0.00	6.06	
FNBA Haines	0	0.00	20.89	0.00	18.30	0.00	22.18	0.00	38.63	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	0	0.00	10.89	0.00	12.96	0.00	24.15	0.00	52.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kenai	0	0.00	18.38	0.00	15.26	0.00	21.48	0.00	44.88	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kodiak	1	4.00	12.54	0.00	12.87	0.00	25.65	0.00	48.94	100.00	0.00	0.00	0.00	0.00	0.00	
FNBA Mat Su	1	4.00	18.43	0.00	15.98	0.00	24.14	100.00	41.45	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Sitka	2	8.00	13.77	0.00	18.07	0.00	23.37	0.00	44.79	100.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	1	4.00	13.18	0.00	8.68	0.00	19.03	0.00	59.11	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (WE1)

** As a percentage of loans with borrower income information available. No information was available for 8.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Anchorage AA					Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Anchorage	975	45.69	20.01	4.20	17.99	12.24	22.35	26.08	39.65	57.48	5.76	5.14	6.14	5.89	5.66
Limited Review:															
FNBA Bethel	23	1.08	23.62	4.35	13.19	13.04	21.56	17.39	41.63	65.22	28.89	0.00	75.00	0.00	25.64
FNBA Fairbanks	202	9.47	19.22	1.60	17.03	10.70	21.53	20.32	42.22	67.38	12.40	12.50	10.84	11.52	12.92
FNBA Haines	58	2.72	20.89	19.64	18.30	16.07	22.18	26.79	38.63	37.50	73.47	100.00	60.00	81.82	66.67
FNBA Juneau	95	4.45	10.89	3.30	12.96	7.69	24.15	25.27	52.00	63.74	10.90	37.50	12.50	11.54	10.08
FNBA Kenai	297	13.92	18.38	5.96	15.26	15.79	21.48	24.56	44.88	53.68	17.61	19.15	18.80	17.07	17.48
FNBA Kodiak	56	2.62	12.54	0.00	12.87	7.69	25.65	19.23	48.94	73.08	26.76	0.00	30.00	26.67	27.27
FNBA Mat Su	283	13.26	18.43	5.17	15.98	9.59	24.14	28.04	41.45	57.20	9.93	17.39	8.11	11.42	9.32
FNBA Sitka	79	3.70	13.77	0.00	18.07	8.22	23.37	21.92	44.79	69.86	21.43	0.00	26.67	19.15	21.97
FNBA Valdez Cordova	66	3.09	13.18	6.35	8.68	7.94	19.03	12.70	59.11	73.02	27.16	75.00	50.00	19.23	25.81

* Based on 2002 Peer Mortgage Data (WE1)

** As a percentage of loans with borrower income information available. No information was available for 7.1% of loans originated and purchased by bank.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Anchorage AA			Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Anchorage	2,753	47.74	58.87	65.96	70.14	17.84	12.02	13.70	29.04
Limited Review:									
FNBA Bethel	17	0.29	82.05	76.47	52.94	23.53	23.53	14.38	28.81
FNBA Fairbanks	1,128	19.56	62.51	42.91	82.45	9.40	8.16	20.67	32.29
FNBA Haines	68	1.18	57.93	82.35	86.76	10.29	2.94	28.35	55.77
FNBA Juneau	112	1.94	60.58	58.04	78.57	14.29	7.14	5.46	8.71
FNBA Kenai	882	15.29	60.66	76.64	71.20	18.93	9.86	21.15	35.56
FNBA Kodiak	59	1.02	76.13	86.44	66.10	18.64	15.25	6.78	15.38
FNBA Mat Su	552	9.57	58.85	78.26	76.99	16.85	6.16	14.23	26.54
FNBA Sitka	80	1.39	60.35	67.50	75.00	17.50	7.50	9.94	16.22
FNBA Valdez Cordova	116	2.01	60.95	75.86	81.90	8.62	9.48	15.68	30.60

* Based on 2002 Peer Small Business Data -- US and PR

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.16% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Anchorage AA			Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Anchorage	8	7.69	88.39	100.00	62.50	37.50	0.00	23.08	30.00
Limited Review:									
FNBA Bethel	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
FNBA Fairbanks	2	1.92	91.14	50.00	0.00	100.00	0.00	16.67	0.00
FNBA Haines	15	14.42	87.50	100.00	100.00	0.00	0.00	100.00	100.00
FNBA Juneau	3	2.88	91.67	100.00	100.00	0.00	0.00	28.57	33.33
FNBA Kenai	15	14.42	88.39	100.00	86.67	13.33	0.00	24.32	27.27
FNBA Kodiak	16	15.38	88.89	87.50	62.50	37.50	0.00	33.33	32.26
FNBA Mat Su	1	0.96	95.88	100.00	100.00	0.00	0.00	0.00	0.00
FNBA Sitka	14	13.46	81.48	100.00	85.71	14.29	0.00	31.25	31.25
FNBA Valdez Cordova	30	28.85	90.00	96.67	96.67	3.33	0.00	73.68	72.22

* Based on 2002 Peer Small Business Data -- US and PR

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Anchorage AA									
Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNBA Anchorage	6	463	38	185	44	648	8.87	0	0
Limited Review:									
FNBA Bethel	1	716	3	2	4	718	9.82	0	0
FNBA Fairbanks	1	5,752	1	1	2	5,753	78.72	0	0
FNBA Haines	0	0	0	0	0	0	0.00	0	0
FNBA Juneau	0	0	4	76	4	76	1.04	0	0
FNBA Kenai	0	0	3	2	3	2	0.03	0	0
FNBA Kodiak	0	0	1	1	1	1	0.01	0	0
FNBA Mat Su	0	0	4	24	4	24	0.33	0	0
FNBA Sitka	0	0	5	86	5	86	1.18	0	0
FNBA Valdez Cordova	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: Anchorage AA				Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNBA Anchorage	61.23	10	37.04	0.00	60.00	40.00	0.00	0	0	0	0	0	0	7.49	19.51	42.41	30.59
Limited Review:																	
FNBA Bethel	1.81	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Fairbanks	5.67	2	7.41	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	14.78	49.83	35.38
FNBA Haines	1.65	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Juneau	6.10	3	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	54.19	45.81
FNBA Kenai	10.16	4	14.81	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	4.26	79.03	16.71
FNBA Kodiak	2.68	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	39.63	60.37
FNBA Mat Su	5.95	2	7.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	6.01	85.83	8.16
FNBA Sitka	2.15	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Valdez Cordova	2.61	2	7.41	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	0.00	100.00

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: Anchorage AA						Evaluation Period: JULY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNBA Anchorage	61.23	10	37.04	0	60	40	0	14	41.18	1	9	4	0	7.49	19.51	42.41	30.59
Limited Review:																	
FNBA Bethel	1.81	1	3.70	0	0	100	0	1	2.94	0	0	1	0	0.00	0.00	100.00	0.00
FNBA Fairbanks	5.67	2	7.41	0	50	50	0	2	5.88	0	1	1	0	0.00	14.78	49.83	35.38
FNBA Haines	1.65	1	3.70	0	0	100	0	1	2.94	0	0	1	0	0.00	0.00	100.00	0.00
FNBA Juneau	6.10	3	11.11	0	0	100	0	3	8.82	0	0	2	1	0.00	0.00	54.19	45.81
FNBA Kenai	10.16	4	14.81	0	0	75	25	4	11.76	0	0	3	1	0.00	4.26	79.03	16.71
FNBA Kodiak	2.68	1	3.70	0	0	100	0	2	5.88	0	0	2	0	0.00	0.00	39.63	60.37
FNBA Mat Su	5.95	2	7.41	0	0	100	0	2	5.88	0	0	2	0	0.00	6.01	85.83	8.16
FNBA Sitka	2.15	1	3.70	0	0	100	0	2	5.88	0	0	2	0	0.00	0.00	100.00	0.00
FNBA Valdez Cordova	2.61	2	7.41	0	0	0	100	3	8.82	0	0	0	3	0.00	0.00	0.00	100.00

Table 1. Lending Volume

LENDING VOLUME												
Geography: Anchorage AA												
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004												
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
FNBA Anchorage	46.52	1,095	171,610	1,605	227,550	6	717	20	58,033	2,726	457,910	61.46
Limited Review:												
FNBA Bethel	0.96	42	5,988	12	1,463	0	0	2	30	56	7,481	1.54
FNBA Fairbanks	14.23	291	40,549	538	43,225	2	106	3	4,367	834	88,247	6.49
FNBA Haines	2.05	64	7,501	47	2,849	9	78	0	0	120	10,428	1.65
FNBA Juneau	2.66	107	15,186	45	8,987	3	94	1	5	156	24,272	5.76
FNBA Kenai	15.39	362	48,500	530	47,515	10	904	0	0	902	96,919	9.72
FNBA Kodiak	1.64	51	7,871	33	3,511	11	717	1	12,000	96	24,099	2.71
FNBA Mat Su	11.76	365	50,656	318	28,441	1	5	5	911	689	80,013	6.35
FNBA Sitka	2.35	93	15,692	37	3,825	8	462	0	0	138	19,979	1.99
FNBA Valdez Cordova	2.44	62	7,853	62	4,250	19	521	0	0	143	12,624	2.33

* Loan Data as of December 06, 2004. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2004 to June 30, 2004.

*** Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Anchorage AA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans					
Full Review:															
FNBA Anchorage	211	38.36	0.51	0.47	18.28	24.17	47.17	45.50	34.04	29.86	2.27	2.00	2.63	2.21	2.14
Limited Review:															
FNBA Bethel	15	2.73	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	32.61	0.00	0.00	32.61	0.00
FNBA Fairbanks	63	11.45	0.00	0.00	2.86	14.29	67.77	57.14	29.37	28.57	7.13	0.00	18.00	6.06	7.50
FNBA Haines	7	1.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	41.18	0.00	0.00	41.18	0.00
FNBA Juneau	23	4.18	0.00	0.00	0.00	0.00	47.33	60.87	52.67	39.13	5.49	0.00	0.00	7.91	3.72
FNBA Kenai	90	16.36	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.98	0.00	0.00	20.98	0.00
FNBA Kodiak	9	1.64	0.00	0.00	0.00	0.00	28.03	22.22	71.97	77.78	8.57	0.00	0.00	8.70	8.54
FNBA Mat Su	98	17.82	0.00	0.00	0.00	0.00	72.54	73.47	27.46	26.53	7.97	0.00	0.00	8.00	7.90
FNBA Sitka	21	3.82	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.19	0.00	0.00	20.19	0.00
FNBA Valdez Cordova	13	2.36	0.00	0.00	0.00	0.00	33.99	0.00	66.01	100.00	15.29	0.00	0.00	0.00	26.00

* Based on 2003 Peer Mortgage Data (WE)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans	% Owner OCC Units***	% BANK Loans						
Full Review:																
FNBA Anchorage	4	50.00	0.51	0.00	18.28	0.00	47.17	75.00	34.04	25.00	1.02	0.00	0.00	1.61	0.75	
Limited Review:																
FNBA Bethel	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	2	25.00	0.00	0.00	2.86	0.00	67.77	50.00	29.37	50.00	4.00	0.00	0.00	3.03	5.88	
FNBA Haines	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	0	0.00	0.00	0.00	0.00	0.00	47.33	0.00	52.67	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kenai	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kodiak	0	0.00	0.00	0.00	0.00	0.00	28.03	0.00	71.97	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Mat Su	1	12.50	0.00	0.00	0.00	0.00	72.54	100.00	27.46	0.00	1.25	0.00	0.00	1.75	0.00	
FNBA Sitka	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	1	12.50	0.00	0.00	0.00	0.00	33.99	0.00	66.01	100.00	20.00	0.00	0.00	0.00	20.00	

* Based on 2003 Peer Mortgage Data (WE)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner OCC Units ^{***}	% BANK Loans	% Owner OCC Units ^{***}	% BANK Loans	% Owner OCC Units ^{***}	% BANK Loans	% Owner OCC Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNBA Anchorage	855	44.14	0.51	0.94	18.28	11.35	47.17	47.49	34.04	40.23	4.17	8.33	3.50	4.36	4.12
Limited Review:															
FNBA Bethel	26	1.34	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	37.68	0.00	0.00	37.68	0.00
FNBA Fairbanks	221	11.41	0.00	0.00	2.86	1.81	67.77	62.44	29.37	35.75	11.49	0.00	7.84	10.84	13.17
FNBA Haines	57	2.94	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	64.04	0.00	0.00	64.04	0.00
FNBA Juneau	83	4.28	0.00	0.00	0.00	0.00	47.33	32.53	52.67	67.47	6.85	0.00	0.00	5.57	7.70
FNBA Kenai	269	13.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	16.01	0.00	0.00	16.01	0.00
FNBA Kodiak	42	2.17	0.00	0.00	0.00	0.00	28.03	28.57	71.97	71.43	16.87	0.00	0.00	13.33	18.87
FNBA Mat Su	264	13.63	0.00	0.00	0.00	0.00	72.54	67.80	27.46	32.20	8.69	0.00	0.00	8.57	8.96
FNBA Sitka	72	3.72	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	22.09	0.00	0.00	22.09	0.00
FNBA Valdez Cordova	48	2.48	0.00	0.00	0.00	0.00	33.99	35.42	66.01	64.58	20.17	0.00	0.00	11.72	33.33

^{*} Based on 2003 Peer Mortgage Data (WE)

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share (%) by Geography *				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
FNBA Anchorage	25	67.57	5.84	12.00	54.81	56.00	33.76	24.00	5.59	8.00	33.78	50.00	53.85	25.00	11.11	
Limited Review:																
FNBA Bethel	1	2.70	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00	
FNBA Fairbanks	5	13.51	0.00	0.00	13.33	60.00	72.84	40.00	13.83	0.00	38.46	0.00	42.86	33.33	0.00	
FNBA Haines	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	1	2.70	0.00	0.00	0.00	0.00	74.87	100.00	25.13	0.00	25.00	0.00	0.00	50.00	0.00	
FNBA Kenai	3	8.11	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00	
FNBA Kodiak	0	0.00	0.00	0.00	0.00	0.00	46.22	0.00	53.78	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Mat Su	2	5.41	0.00	0.00	0.00	0.00	67.65	50.00	32.35	50.00	66.67	0.00	0.00	50.00	100.00	
FNBA Sitka	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	0	0.00	0.00	0.00	0.00	0.00	26.57	0.00	73.43	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (WE)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans						
Full Review:																
FNBA Anchorage	1,605	49.74	2.72	1.06	36.65	28.22	39.90	44.05	20.73	26.67	16.23	10.90	15.64	17.15	20.08	
Limited Review:																
FNBA Bethel	12	0.37	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.58	0.00	17.54	29.27	0.00	
FNBA Fairbanks	538	16.67	0.00	0.00	5.80	2.23	71.70	83.64	22.50	14.13	22.52	0.00	10.56	26.82	21.59	
FNBA Haines	47	1.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	32.87	0.00	0.00	43.52	0.00	
FNBA Juneau	45	1.39	0.00	0.00	0.00	0.00	67.01	71.11	32.99	28.89	5.10	0.00	0.00	5.55	5.42	
FNBA Kenai	530	16.42	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.77	0.00	0.00	27.46	0.00	
FNBA Kodiak	33	1.02	0.00	0.00	0.00	0.00	49.50	48.48	50.50	51.52	11.94	0.00	0.00	14.69	11.89	
FNBA Mat Su	318	9.85	0.00	0.00	0.00	0.00	74.17	68.55	25.83	31.45	14.29	0.00	7.36	22.20	16.98	
FNBA Sitka	37	1.15	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.25	0.00	0.00	12.80	0.00	
FNBA Valdez Cordova	62	1.92	0.00	0.00	0.00	0.00	13.98	22.58	86.02	77.42	17.34	0.00	7.75	34.15	38.10	

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2003).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans						
Full Review:																
FNBA Anchorage	6	8.70	0.00	0.00	21.63	16.67	48.23	33.33	30.14	50.00	10.71	0.00	5.88	10.00	18.75	
Limited Review:																
FNBA Bethel	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	2	2.90	0.00	0.00	1.23	0.00	61.73	100.00	37.04	0.00	14.29	0.00	0.00	22.22	0.00	
FNBA Haines	9	13.04	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	90.00	0.00	0.00	90.00	0.00	
FNBA Juneau	3	4.35	0.00	0.00	0.00	0.00	63.27	0.00	36.73	100.00	27.27	0.00	0.00	0.00	37.50	
FNBA Kenai	10	14.49	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.41	0.00	0.00	23.81	0.00	
FNBA Kodiak	11	15.94	0.00	0.00	0.00	0.00	34.15	36.36	65.85	63.64	26.92	0.00	0.00	35.00	22.58	
FNBA Mat Su	1	1.45	0.00	0.00	0.00	0.00	78.35	100.00	21.65	0.00	4.76	0.00	0.00	9.09	0.00	
FNBA Sitka	8	11.59	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	36.36	0.00	0.00	36.36	0.00	
FNBA Valdez Cordova	19	27.54	0.00	0.00	0.00	0.00	47.37	89.47	52.63	10.53	71.43	0.00	100.00	73.91	66.67	

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: Anchorage AA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
Full Review:															
FNBA Anchorage	211	38.36	19.33	10.94	17.89	27.08	23.81	25.00	38.97	36.98	2.27	3.07	2.36	1.69	2.62
Limited Review:															
FNBA Bethel	15	2.73	22.25	0.00	15.67	13.33	16.19	13.33	45.89	73.33	32.61	0.00	33.33	33.33	32.35
FNBA Fairbanks	63	11.45	15.78	16.67	14.74	25.00	22.64	26.67	46.84	31.67	7.45	20.41	8.67	5.39	6.64
FNBA Haines	7	1.27	27.27	0.00	17.10	20.00	23.11	20.00	32.51	60.00	35.71	0.00	16.67	33.33	60.00
FNBA Juneau	23	4.18	10.90	4.55	14.63	9.09	20.59	40.91	53.88	45.45	5.66	7.69	2.44	6.21	6.71
FNBA Kenai	90	16.36	21.47	6.74	17.44	22.47	22.85	29.21	38.24	41.57	21.76	19.35	19.80	19.26	26.06
FNBA Kodiak	9	1.64	15.06	12.50	14.23	25.00	20.41	0.00	50.30	62.50	8.16	20.00	6.90	0.00	13.16
FNBA Mat Su	98	17.82	18.25	16.30	15.94	23.91	23.25	28.26	42.56	31.52	8.33	19.23	8.40	6.99	7.40
FNBA Sitka	21	3.82	12.87	5.26	15.95	31.58	24.63	21.05	46.55	42.11	19.00	25.00	30.00	10.81	20.51
FNBA Valdez Cordova	13	2.36	12.85	0.00	13.59	16.67	19.22	25.00	54.35	58.33	15.00	0.00	28.57	9.68	17.95

* Based on 2003 Peer Mortgage Data (WE)

** As a percentage of loans with borrower income information available. No information was available for 6.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
FNBA Anchorage	4	50.00	19.33	33.33	17.89	0.00	23.81	33.33	38.97	33.33	0.82	5.00	0.00	0.79	0.65	
Limited Review:																
FNBA Bethel	0	0.00	22.25	0.00	15.67	0.00	16.19	0.00	45.89	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Fairbanks	2	25.00	15.78	0.00	14.74	0.00	22.64	50.00	46.84	50.00	4.26	0.00	0.00	7.14	3.85	
FNBA Haines	0	0.00	27.27	0.00	17.10	0.00	23.11	0.00	32.51	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Juneau	0	0.00	10.90	0.00	14.63	0.00	20.59	0.00	53.88	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kenai	0	0.00	21.47	0.00	17.44	0.00	22.85	0.00	38.24	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Kodiak	0	0.00	15.06	0.00	14.23	0.00	20.41	0.00	50.30	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Mat Su	1	12.50	18.25	0.00	15.94	0.00	23.25	0.00	42.56	100.00	1.37	0.00	0.00	0.00	3.33	
FNBA Sitka	0	0.00	12.87	0.00	15.95	0.00	24.63	0.00	46.55	0.00	0.00	0.00	0.00	0.00	0.00	
FNBA Valdez Cordova	1	12.50	12.85	0.00	13.59	0.00	19.22	0.00	54.35	100.00	25.00	0.00	0.00	0.00	50.00	

* Based on 2003 Peer Mortgage Data (WE)

** As a percentage of loans with borrower income information available. No information was available for 12.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: Anchorage AA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
FNBA Anchorage	855	44.14	19.33	7.75	17.89	20.97	23.81	30.62	38.97	40.66	4.90	6.97	5.40	4.76	4.53	
Limited Review:																
FNBA Bethel	26	1.34	22.25	4.00	15.67	16.00	16.19	44.00	45.89	36.00	40.98	50.00	80.00	55.00	26.47	
FNBA Fairbanks	221	11.41	15.78	4.67	14.74	14.95	22.64	27.10	46.84	53.27	14.27	13.70	15.02	12.69	15.06	
FNBA Haines	57	2.94	27.27	12.50	17.10	35.71	23.11	26.79	32.51	25.00	67.47	77.78	68.97	60.00	70.00	
FNBA Juneau	83	4.28	10.90	1.25	14.63	22.50	20.59	33.75	53.88	42.50	8.57	4.55	13.53	9.64	6.81	
FNBA Kenai	269	13.89	21.47	11.24	17.44	15.89	22.85	32.56	38.24	40.31	17.49	20.00	14.86	17.80	17.87	
FNBA Kodiak	42	2.17	15.06	7.32	14.23	19.51	20.41	21.95	50.30	51.22	20.30	16.67	28.57	15.52	21.43	
FNBA Mat Su	264	13.63	18.25	7.54	15.94	20.63	23.25	33.73	42.56	38.10	10.40	14.07	11.48	10.94	9.07	
FNBA Sitka	72	3.72	12.87	7.04	15.95	15.49	24.63	33.80	46.55	43.66	24.83	41.67	23.40	25.53	23.31	
FNBA Valdez Cordova	48	2.48	12.85	4.26	13.59	8.51	19.22	27.66	54.35	59.57	21.86	40.00	18.18	24.07	20.90	

* Based on 2003 Peer Mortgage Data (WE)

** As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Anchorage AA			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Anchorage	1,605	49.74	52.16	64.80	63.30	20.93	15.76	16.23	24.08
Limited Review:									
FNBA Bethel	12	0.37	40.63	91.67	50.00	25.00	25.00	13.58	22.78
FNBA Fairbanks	538	16.67	54.17	39.03	80.30	12.64	7.06	22.52	23.24
FNBA Haines	47	1.46	54.39	91.49	82.98	12.77	4.26	32.87	51.19
FNBA Juneau	45	1.39	49.07	55.56	55.56	15.56	28.89	5.10	6.15
FNBA Kenai	530	16.42	53.60	75.47	71.13	23.02	5.85	20.77	28.96
FNBA Kodiak	33	1.02	61.99	87.88	72.73	12.12	15.15	11.94	17.24
FNBA Mat Su	318	9.85	55.13	68.87	75.16	16.98	7.86	14.29	20.54
FNBA Sitka	37	1.15	49.59	64.86	70.27	21.62	8.11	11.25	12.70
FNBA Valdez Cordova	62	1.92	55.12	88.71	85.48	8.06	6.45	17.34	28.57

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.80% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Anchorage AA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004					
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
FNBA Anchorage	6	8.70	85.11	100.00	50.00	50.00	0.00	10.71	11.54
Limited Review:									
FNBA Bethel	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
FNBA Fairbanks	2	2.90	90.12	100.00	50.00	50.00	0.00	14.29	18.18
FNBA Haines	9	13.04	100.00	100.00	100.00	0.00	0.00	90.00	90.00
FNBA Juneau	3	4.35	81.63	100.00	100.00	0.00	0.00	27.27	27.27
FNBA Kenai	10	14.49	85.09	70.00	70.00	20.00	10.00	20.41	16.28
FNBA Kodiak	11	15.94	82.93	72.73	72.73	27.27	0.00	26.92	22.92
FNBA Mat Su	1	1.45	90.72	100.00	100.00	0.00	0.00	4.76	5.00
FNBA Sitka	8	11.59	96.67	100.00	62.50	37.50	0.00	36.36	36.36
FNBA Valdez Cordova	19	27.54	84.21	100.00	94.74	5.26	0.00	71.43	74.07

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Anchorage AA									
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNBA Anchorage	6	463	81	6,210	87	6,673	50.23	0	0
Limited Review:									
FNBA Bethel	1	716	4	3	5	719	5.41	0	0
FNBA Fairbanks	1	5,752	7	38	8	5,790	43.59	0	0
FNBA Haines	0	0	0	0	0	0	0.00	0	0
FNBA Juneau	0	0	8	34	8	34	0.26	0	0
FNBA Kenai	0	0	6	12	6	12	0.09	0	0
FNBA Kodiak	0	0	2	3	2	3	0.02	0	0
FNBA Mat Su	0	0	8	12	8	12	0.09	0	0
FNBA Sitka	0	0	2	40	2	40	0.30	0	0
FNBA Valdez Cordova	0	0	1	1	1	1	0.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: Anchorage AA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNBA Anchorage	61.46	10	37.04	10.00	60.00	30.00	0.00	0	0	0	0	0	0	1.31	30.34	42.87	25.48
Limited Review:																	
FNBA Bethel	1.54	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Fairbanks	6.49	2	7.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	6.23	67.22	26.55
FNBA Haines	1.65	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Juneau	5.76	3	11.11	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	0.00	53.12	46.88
FNBA Kenai	9.72	4	14.81	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Kodiak	2.71	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	34.25	65.75
FNBA Mat Su	6.35	2	7.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	72.87	27.13
FNBA Sitka	1.99	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
FNBA Valdez Cordova	2.33	2	7.41	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	35.61	64.39

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: Anchorage AA						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 6, 2004									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNBA Anchorage	61.46	10	37.04	10	60	30	0	13	40.63	1	9	3	0	1.31	30.34	42.87	25.48
Limited Review:																	
FNBA Bethel	1.54	1	3.70	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.00	0.00
FNBA Fairbanks	6.49	2	7.41	0	0	100	0	2	6.25	0	0	2	0	0.00	6.23	67.22	26.55
FNBA Haines	1.65	1	3.70	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.00	0.00
FNBA Juneau	5.76	3	11.11	0	0	33	67	3	9.38	0	0	1	2	0.00	0.00	53.12	46.88
FNBA Kenai	9.72	4	14.81	0	0	100	0	4	12.50	0	0	4	0	0.00	0.00	100.00	0.00
FNBA Kodiak	2.71	1	3.70	0	0	100	0	2	6.25	0	0	2	0	0.00	0.00	34.25	65.75
FNBA Mat Su	6.35	2	7.41	0	0	100	0	2	6.25	0	0	2	0	0.00	0.00	72.87	27.13
FNBA Sitka	1.99	1	3.70	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.00	0.00
FNBA Valdez Cordova	2.33	2	7.41	0	0	0	100	3	9.38	0	0	0	3	0.00	0.00	35.61	64.39