



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

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Community Reinvestment Act Performance Evaluation

Fleet National Bank
Charter Number: 200

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Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- The strength of Fleet National Bank's (Fleet) overall lending, especially in its major markets;
- The excellent geographic and borrower distribution for home purchase lending;
- The high level of community development lending used to assist in developing affordable housing and promoting economic development to revitalize low- and moderate-income areas, especially older center cities;
- Flexible mortgage products developed and/or used by Fleet to address the needs of low- and moderate-income borrowers in many high costs areas was apparent;
- Fleet was recognized as the number one SBA lender in 2000 due to the volume of lending to small businesses;
- An excellent number and overall dollar of qualified investments in its assessment areas; and,
- Offices and delivery systems, which provide access to financial products and services for geographies and individuals of different income levels.

Definitions and Common Abbreviations

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

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.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

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

Community Development (CD) - Affordable 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.

Full-Scope Review - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the U.S. Census Bureau 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 statistical area to file annual summary reports

of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, 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.

Limited-Scope Review - Performance under the lending, investment, and service tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

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 Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

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

Description of Institution

Fleet National Bank (Fleet) is chartered in Providence, Rhode Island although the actual headquarters is located in Boston, Massachusetts. The institution had assets of \$166 billion as of December 31, 2000. Tier 1 Capital was \$12 billion. This bank is an interstate bank operating in Connecticut, Florida, Maine, Massachusetts, New Jersey, New Hampshire, New York and Rhode Island. In addition, Fleet operates retail branches in Latin America under the name BankBoston.

Fleet is the principal banking subsidiary of FleetBoston Financial Corporation (FFC). FFC is a diversified financial services company organized under the laws of the State of Rhode Island and headquartered in Boston, Massachusetts. At December 31, 2000, the Corporation had total assets of \$180 billion and total deposits of \$101 billion.

This bank is the result of several mergers completed during this evaluation period. On October 1, 1999, Fleet Financial Group merged with Bank Boston Financial; a New England based financial services company with \$76 billion in assets. On March 31, 2000, BankBoston, NA merged with Fleet and over the next six months 306 branches were divested per order of regulators. This divestiture was the largest ever ordered. Fleet Bank, NA the subsidiary operating in the New York and New Jersey areas was merged into Fleet on September 1, 2000. Fleet Bank of New Hampshire was merged into Fleet on May 1, 2000, Fleet Bank of Maine on October 2, 2000 and Fleet FSB on April 3, 2000. In addition, on March 1, 2001, FFC completed the merger of Summit Bancorp; a New Jersey based financial services company with \$40 billion of assets. The three banking charters were merged into Fleet on that date. On June 1, 2001, after the end of the evaluation period, Fleet sold its mortgage subsidiary, Fleet Mortgage Company. The bank will continue to originate home mortgage loans within its assessment area through the bank.

Fleet requested that loans, investments and services originated or purchased by Fleet Mortgage Company, Fleet Development Ventures (FDV), BankBoston Development Company (BBDC), Fleet CDC, Fleet Securities and BankBoston Capital be considered as part of the bank's performance. Fleet has no subsidiaries that negatively impacted the bank's capacity to lend or invest in its communities.

Total loans represented 65% of the bank's total assets at December 30, 2000. The loan portfolio is comprised as follows: commercial 48%, 1-4 family residential real estate 14%, consumer 9%, commercial real estate 8%, construction and development real estate 2%, leases 12%, and 7% all other loans. Foreign offices

contributed 19% of the deposits held by Fleet and 16% of the assets.

FFC through its subsidiaries offers a comprehensive array of financial services to approximately 20 million customers. Its key businesses include: consumer and small business banking, commercial banking (including middle-market lending, asset-based lending, leasing, cash management, trade finance and government banking), international banking, corporate banking, principal investing, investment banking securities brokerage, market-making and clearing services, investment services (including asset management, mutual funds and retirement planning), credit card services, commercial real estate lending, mortgage banking, and student loan and other processing.

There are no known legal, financial or other factors impeding the bank's ability to help to meet the credit needs of its assessment areas.

The last CRA examination of Fleet was dated February 23, 1998. We assigned a Satisfactory rating on the bank's performance at that time.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Fleet's HMDA mortgage lending and reportable CRA loans were evaluated for the period January 1, 1998 through December 31, 2000. During this period, loans originated by BankBoston entities are included for 1999 and 2000 as the merger was consummated October 1, 1999. We reviewed at the bank's option, bank supplied data pertaining to consumer lending activities. The time period for these loans was also January 1, 1998 through December 31, 2000. Fleet does not originate a substantial number of small farm loans in any of its assessment areas and therefore these loans where originated were not analyzed.

Community development loans and qualified investments originated by Fleet and its affiliates during the period of January 1, 1998 through June 30, 2001 were considered. Community development loans and qualified investments for BankBoston entities were accepted if originated after October 1, 1999 when it became an affiliate of Fleet. All qualified investments still outstanding at June 30, 2001 and originated by BankBoston Financial and Summit Bancorp entities were considered. Our conclusions related to community development loans and qualified investments were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness and degree to which these instruments are not routinely provided by private investors.

In analyzing Fleet's Lending Test more emphasis was placed on home mortgage lending due to the high percentage of the bank's

reportable lending in this type of loan. Based on input from community groups, more weight was given to performance in home purchase lending. Also, little weight was given to refinance lending due to the fact that the rate environment drives this product. While not weighted as heavily, lending performance in small business loans was considered. There were a significant number of consumer loans originated during this period and these loans were given weight for the lending test. Community development lending was given positive consideration in all areas where it was significant. However, in the New York City MSA, more consideration was given to community development lending for affordable housing than mortgage lending due to the extremely high costs of housing in this MSA.

Data Integrity

We conducted a data integrity review in November of 2000. During this review, we sampled consumer, small business and community development loans to ensure that the information that we would be evaluating during this examination was accurate. In addition, mortgage data was sampled as part of the fair lending examination. In these reviews, publicly filed data was compared to the actual loan files to determine accuracy. Our reviews found that the publicly available information was accurate and could be relied upon for this evaluation. Some adjustments were made to information that was not publicly available for use such as qualified investment information.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas within that state was selected for full-scope reviews. We determined which assessment areas would have full-scope reviews based on a review of the volume of deposits in the assessment areas, volume of mortgage and small business lending, the branching presence and the level of complaints. At least one assessment area was selected for a full-scope review in each state. Every multistate metropolitan area in which the bank has branches in more than one state received a full-scope review. Refer to the Scope section under each state rating for details regarding which areas were selected.

Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. In arriving at the overall rating the greatest weighting was given to these areas in order of greatest significance to the bank: Boston, MA-NH Multistate MSA, the State of New York, the State of New Jersey, the State of Connecticut and the State of Massachusetts. These are the five assessment areas with the greatest volumes of deposits.

The multistate metropolitan area ratings are based on the full-scope review of those areas. State ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

We performed a fair lending review of Fleet Mortgage Company (FMG) in October of 2000. During this review, a comparative file analysis was performed on HMDA purchase mortgage data using regression modeling. The prohibited bases used for the analyses included black and Hispanic applicants. No violations of the substantive provisions of the anti-discrimination laws and regulations were found.

During this examination, we also reviewed FMG's policies, procedures and practices. We found that Fleet has a satisfactory process for ensuring that all loan decisions are made in a non-discriminatory manner.

Inside/Outside Ratio

During the evaluation period, Fleet originated a substantial majority of its loans within its assessment areas. The bank originated or purchased 80.2% of the HMDA products, 87.0% of the CRA reportable loans and 94.3% of the consumer lending loans within the assessment areas during this evaluation period.

Innovative/ Flexible Lending Products

Fleet participates in governmental programs that offer flexible underwriting for home mortgages through secondary market providers and small businesses offered through the SBA. In addition, the bank also participates in each State Housing Finance Authority mortgage programs. These programs provide more flexibility especially to low- or moderate-income borrowers or those located in low- or moderate-income areas.

In addition Fleet has developed flexible programs that are offered throughout its assessment areas. These include:

Fleet Affordable Advantage - This mortgage program allows a low downpayment and requires no PMI or origination fee.

LMI Equity Loans - This home equity product allowed high loan-to-values for properties located in low- or moderate-income areas or for low- or moderate-income borrowers. It allows for a lower minimum loan and was priced comparably to the standard product.

Fleet Co-Loans - This small business loan program offered through FDV, provides businesses operating in low- or moderate-income

areas a subordinated loan, which then allows them to qualify for standard small business loan programs. This program has more flexible underwriting for qualified businesses.

BankBoston Development Company (BBDC) - This small business loan program allows more flexible underwriting for businesses operating in low- or moderate-income areas by lowering the required credit score for qualification.

Second Chance Loans - This consumer loan program provides an alternative scorecard for low- and moderate-income borrowers who fail to qualify for loans under the standard scorecard.

Within some assessment areas, Fleet has developed specific loan products and those are discussed within the Lending Test section for those areas. The number and dollar of loans made under the flexible governmental programs and assessment area-wide programs will be discussed in the Lending Test sections for each area.

Banking Services

Fleet offers a full range of banking services at its branches. However, management has designed some specific products for use in low- and moderate-income geographies or by low- and moderate-income individuals across the institution. These include:

" Basic Banking Services" products include a checking account, savings account, and credit account (unsecured installment loan).

" Basic Checking Accounts" are designed for customers with limited transaction needs. Low monthly fees are offered and there are no minimum balance requirements and funds are accessible through a 24-hour access ATM card.

" Electronic Transaction Accounts" (ETA) provide lower cost banking options to both individuals receiving Federal benefits such as Social Security, Supplemental Security Income, or military and railroad retirement payments, and those who historically have not had a bank account. This product supports management's commitment to serve low- and moderate-income individuals with lower-cost banking options while focusing on under-served consumers. Fleet is the first major bank in the Northeast to offer ETA for individuals. ETA was introduced in the fourth quarter of 2000, and more than 1,000 new accounts have been opened with historically non-banked customers.

" No-fee check cashing" continues as an alternative for non-customers that cash federal benefits checks across the institution. This is offered throughout the bank's assessment areas with the exception of Upstate New York and Florida.

" First Community Bank" (FCB) is a nationally acclaimed " bank within a bank" offering a complete range of products and services individuals and small businesses in low- and moderate-income urban areas. FCB's mission is to be a leader in community economic development and a catalyst for wealth creation in low-

and moderate-income, historically under-served and culturally diverse markets. It has grown from its original seven branches located in inner city Boston to sixty-seven branches serving fourteen major cities and four states.

" Fleet Kids" is an educational program that focuses on school children in low- and moderate-income areas. This program features on-line money management in a fun and hands-on manner. Participants earn points toward technology-based awards for their schools. More than 1,100 schools have registered for this program, 357 (32%) are in low- and moderate-income areas.

Multistate Metropolitan Area Rating

CRA rating for the Boston, MA-NH Multistate MSA¹: Outstanding

The lending test is rated: Outstanding

The investment test is rated:
Outstanding

The service test is rated:

tanding

Outs

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The geographic distribution of loans reflects excellent penetration throughout the assessment area;
- The distribution of borrowers reflects excellent penetration for home mortgage and consumer loans;
- A significant level of community development loans and the creativity and leadership demonstrated;
- A significant level of qualified community development investments and grants; and,
- Delivery systems and offices are readily accessible to geographies and individuals of different income levels in its assessment area.

Description of Institution's Operations in the Boston, MA-NH Multistate MSA

The Boston, MA-NH assessment area includes all of the 711 census tracts in the multistate MSA. It covers a broad area of Massachusetts stretching from the southern coastline of Barnstable County up to New Hampshire on the north, and west from the metropolitan area of Boston to Worcester County. There are 200 branches and 939 ATMs in the assessment area. This multistate MSA contains the largest share of the bank's total deposits at 39.5%.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the Market Profile for the Boston, MA-NH Multistate MSA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

Fleet's performance under the lending test is rated " Outstanding" in the Boston, MA-NH Multistate MSA.

Lending Activity

Refer to Table 1 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending activity is excellent in the Boston MSA. Fleet's deposits rank 1st in the marketplace according to the 2000 FDIC Deposit Market Share Report data with a market share of 37%. Lending competition is intense for both mortgage loans and small business loans with 527 local and national HMDA reporters and 177 CRA reporters identified in this assessment area. The bank ranked 2nd in home purchase lending with a market share of 5%, 1st in home improvement lending with a market share of 28% and 2nd in refinance lending with a market share of 6%. For home purchase and refinance loans a nationwide mortgage company was ranked number one. Fleet was ranked 3rd for the number of small loans to businesses with market share of 15% behind two large nationwide companies providing credit card loans. Their average loan sizes were \$8 and \$3 thousand in comparison to Fleet's \$108 thousand. Fleet's dollar market share for small loans to businesses was 19%.

During the evaluation period, Fleet originated 28,535 mortgage loans totaling \$3.5 million. Home mortgage lending in this MSA represents 13% of the number and 16% of the dollar amount of the bank's overall home mortgage lending. Of the total number of home mortgage loans made in the MSA, approximately 51% were refinances, 28% purchase, and 21% home improvement loans. Only 18 multifamily loans were originated in this MSA, therefore an analysis of that data was not meaningful. Home mortgage lending represented 73% of the reportable loans for this assessment area.

Loans to small businesses in the MSA represents 21.81% of the number and 18.52% of the dollar amount of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated 10,752 loans totaling \$811 million. Loans to small businesses represented 27% of the reportable loans for this assessment area.

The bank provided consumer loans for consideration. In the multistate metropolitan area, they represent 28.44% of the number and 29.47% of the dollar amount of the bank's overall volume of consumer loans. During the evaluation period, Fleet originated 176,904 loans totaling \$1.6 Billion. Loan types included in this category consist of home equity, motor vehicle, and other secured

and unsecured loans. There is no market share information data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is excellent in the Boston MSA. The opportunities for lending in the low-income geographies are limited; as the percentage of owner occupied units in these geographies is only 0.88% or 6,088 units. The very high cost of housing coupled with a limited supply and aged housing stock further challenge this market.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent in the Boston MSA. The percentage of home purchase loans made in low-income geographies greatly exceeds the percentage of owner occupied housing units. The market share in low-income geographies significantly exceeded the overall market share.

In the moderate-income geographies the percentage of home purchase loans made significantly exceeded the percentage of owner occupied housing units. The market share in moderate-income geographies also exceeded the overall market share.

Home Improvement Loans

Home improvement loan distribution is excellent in the Boston MSA. The percentage of loans made in the low-income geographies was greater than the percentage of owner occupied housing units there. The market share for low-income geographies exceeded the bank's overall market share. In the moderate-income geographies, the percentage of loans made slightly exceeded the percentage of owner occupied housing. The market share for moderate-income geographies was less than the bank's overall market share.

Home Mortgage Refinance Loans

Home refinance loan distribution is excellent in the Boston MSA. The percentage of loans made in the low-income geographies was greater than the percentage of owner occupied housing. In the moderate-income geographies, the percentage of loans was near to the percentage of owner occupied housing units there. The market share for loans made in both low- and moderate-income geographies exceeded the bank's overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses made in the Boston MSA is excellent. The bank's percentage of small loans to businesses in both the low- and moderate-income geographies exceeded the percent of businesses located there. In addition, the market share for loans made to businesses in low- and moderate-income geographies exceeded the bank's overall market share.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is excellent in the Boston MSA. Fleet's percentage of loans to both low- and moderate-income geographies exceeded the percent of households that resides there.

Lending Gap Analysis

An analysis of Fleet's home mortgage, small business and consumer lending patterns did not reveal any significant or unexplained gaps in the geographic distribution in this assessment area. Although there were a few low- or moderate-income geographies where Fleet originated no small business loans, there were a limited number of businesses located in these areas.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Fleet's overall distribution of loans in the Boston MSA by borrower income reflects an excellent penetration among customers of different income levels. The high cost of housing makes it extremely difficult for low- and/or moderate-income families to afford housing in this MSA. More consideration was placed on the moderate-income performance due to the cost of housing.

Home Purchase Loans

Fleet's distribution of home purchase loans is excellent in the Boston MSA.

The borrower distribution of home purchase lending is excellent. The percentage of lending to low-income borrowers was below the percentage of low-income families, but the percentage of lending to moderate-income borrowers significantly exceeded the percentage of such families. Further, the bank's market share for both low- and moderate-income borrowers was significantly greater than the overall market share.

Home Improvement Loans

The borrower distribution of home improvement loans is good in the Boston MSA.

The percentage of lending to low-income borrowers was below the percentage of low-income families. However, the bank's market share of loans to low-income families exceeded the overall market share. The percentage of lending to moderate-income borrowers was slightly less than percentage of such families. The market share for moderate-income borrowers is less than the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is excellent in the Boston MSA.

The percentage of lending to low-income borrowers was significantly below the percentage of low-income families. However, the percentage of lending to moderate-income families exceeded the percentage of such families. The bank's market share of loans made to both low- and moderate-income families exceeded the overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses is adequate in the Boston MSA. The bank's percentage of loans to small businesses is significantly less the percentage of all small businesses in the assessment area. The bank's market share for loans to businesses with annual revenues of \$1 million or less was also less than their overall market share for all small business loans. A substantial majority of small loans to businesses were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans is excellent in the Boston MSA. Fleet's percentage of loans to both low- and moderate-income borrowers significantly exceeded the percent of those households.

Community Development Lending

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

CD loans had a positive impact on the Lending Test. During the evaluation period, Fleet originated 76 community development loans totaling \$602 million, a relatively high level of loans in this MSA. The dollar volume represents 12.45% of the allocated Tier 1 Capital.

The following are examples of community development loans made that demonstrate complexity, leadership, flexibility or creativity.

- Fleet provided a \$3.1 million commercial real estate loan to finance the complete renovation of a blighted building in a designated empowerment zone that has been vacant since 1987. This is one of the biggest commercial development projects in the area in recent years. After renovations, the building will bring jobs to the area and provide a customer base for neighborhood businesses.
- Fleet also funded another project in this empowerment zone. This transaction highlights Fleet's creative and flexible underwriting practices, as it combines a \$4.6 million construction loan with a \$430,000 co-loan to allow for the renovation of a commercial building. The co-loan complements the construction loan and provides subordinated financing to fill gaps in the borrower's resources.
- Fleet provided multiple lines of credit that facilitated LIHTC (Low-Income Housing Tax Credit) activities by providing interim funding before investor pay-ins for these investments. The amount of these lines of credit ranged from \$15 million to \$44 million. Lines of credit in such large denominations are not readily available in the general marketplace.
- Fleet demonstrated its lending creativity by financing two loans that will revitalize and stabilize this low- and moderate-income inner city neighborhood. The first loan for \$1.45 million will be used in conjunction with Section 108 loan funds and a grant from the city to finance the

construction of the new retail center. This center will bring jobs and a broad range of services to the core of this neighborhood. The second loan of more than \$1.8 million will add a homeownership component, as the loan proceeds will be used to construct a new 19-unit homeownership project and to leverage grants from the city and state level.

- Fleet provided complex financing to an affordable housing agency by underwriting three different types of loans to address the agency's full range of credit needs. Specifically, Fleet provided a \$195 thousand term loan, a \$200 thousand mortgage warehouse line of credit, and \$200 thousand regular line of credit, for a total of \$595 thousand.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions for this MSA.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: Fleet Affordable Advantage (155 / \$27.3 million), LMI Equity Loans (10 / \$169 thousand), Fleet Co-Loans (15 / \$2.7 million), BBDC Loans (2,417 / \$11.2 million) and Second Chance Loans (921 / \$2.9 million). In addition, Fleet originated FHA loans (362 / \$55 million) and State Housing Finance Authority loans (151 / \$18.9 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

- N.A.C.A. (Neighborhood Assistance Corp of America): Flexible underwriting features of the program include higher qualifying ratios with a maximum debt ratio of 40% and no mortgage insurance. Fleet originated 279 loans for \$49 million under this program.
- Massachusetts Soft Second Program: This below-market interest rate program features a 75% first and a 20% second mortgage, no points and no mortgage insurance. The second mortgage is interest only for 10 years and the interest payment may be subsidized. The program also features no points and no mortgage insurance. Fleet originated 729 loans for \$47.8 million under this program.
- Massachusetts Housing Financing Agency Home Improvement Loans-the "Get the Lead Out" and "Septic Repair System" programs provide below-market interest rate funds and a maximum term of 20 years. Innovative and flexible features include 0% interest for owner-occupied units and 3% for non-owner

occupied. For the Septic Repair program, loan amounts range from \$1,000 to \$25,000. There is also a home improvement program with a 6.25% fixed rate for a maximum term of 15 years for owner occupied properties. Fleet originated 203 loans for \$20 million under these programs.

- Fannie Mae House Boston: Flexible features of this program include more flexible qualifying standards and low downpayments for purchase and rehabilitation loans. Fleet originated 36 loans for \$8.4 million.

INVESTMENT TEST

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

Fleet's performance under the investment test in the Boston MSA is rated " Outstanding" .

The level of qualified investments is excellent. Fleet originated 359 qualified investments during the evaluation period totaling \$22.4 million in the Boston MSA. An additional, \$58.5 million from statewide investments was allocated to this assessment area as well as \$373.9 million in investments from a broader regional area bringing the total qualified investments to \$453.8 million. This volume of investments is responsive to the credit needs of the community and the many opportunities that are present in the MSA. The bank's investments have had a positive impact on the community. The dollar volume of the investments represented 9.39% of the bank's allocated Tier 1 Capital. In addition, Fleet has \$70.8 million in investments that were made prior to this evaluation period and are still outstanding.

The following are examples of community development investments; grants or donations made during the evaluation period that demonstrate complexity, leadership, flexibility or creativity.

- Fleet has provided a \$2 million recoverable investment to fund an affordable housing organization's development activities. Upon maturity, the investment will convert to a Challenge Grant, which will serve as a prototype for the organization's outreach to other corporations.
- Fleet provided a \$50 thousand grant to fund an initiative that will conduct research into affordable housing and neighborhood revitalization solutions, with a focus on developing holistic approaches to meeting the needs of low- and moderate-income communities. Fleet also provided a \$180 thousand grant to fund the implementation of a prototype project through a collaborative effort with the university involved.

- Fleet has launched a comprehensive strategy for closing the Digital Divide by delivering a full range of computer literacy training programs, providing up-to-date equipment, and offering meaningful on-line content to under-served low-and moderate-income communities.
- Fleet provided four grants totaling \$110 thousand, allowing an agency to pursue a wide range of economic development activities in Dorchester and Roxbury, including a pioneering effort to reclaim abandoned commercial sites and return them to active use.

SERVICE TEST

Fleet's performance under the Service Test in the MSA is rated " Outstanding" .

Retail Banking Services

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

Fleet's delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area. Fleet's distribution of the 200 branches in this assessment area is excellent. Branches are readily accessible to geographies and individuals of difference income levels in its assessment area. Its distribution of branches in low-income geographies exceeds the population that resides there, while in moderate-income geographies is less than the percentage of the population that reside there. Mitigating the slightly lower distribution in moderate-income areas are the 23 FCB branches within the low- and moderate-income geographies offering a higher level of service than regular branches. In addition, the close proximity of other branches located in middle-income census tracts to low- and moderate-income census tracts is a mitigating factor.

On a net basis, branch openings and closings had no adverse affect on the accessibility of retail delivery systems to low- and moderate-income individuals and geographies. During the evaluation period, Fleet closed six branches, five in low-and moderate-income geographies. One branch that mainly served commuting office workers was consolidated into another office two blocks away, two branches were relocated within the same geography, and two airport branches used only for foreign exchange transactions were closed due to the loss of a contract.

Fleet's branch hours and services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals. While a higher percentage of branches located in low- or moderate-income areas

are not open on Saturdays; these were primarily located in business districts where there is little weekend traffic. Supermarket branches also offer Sunday hours. Seven supermarket branches are located in low- or moderate-income census tracts and offer the same products, services and hours as those operated in other census tracts.

There are no material differences in services provided throughout the branch network. Fleet's standard loan and deposit products are offered at all locations.

The ATM network is extensive with over 900 in this multistate MSA. Other on-site ATM-related services include Braille ATMs and drive-up ATMs located throughout the MSA. A majority of the ATMs offers multilingual services in Spanish, Chinese, Korean, and Portuguese, with 88% of those in low- or moderate-income areas offering multilingual services.

Community Development Services

Fleet provides a relatively high level of community development services. Its numerous and frequent activities are primarily focused on consumer and small business owner education. Seminars offered include Basic Banking, First-Time Homebuyers, Individual Credit Counseling, Technical Assistance for Small Businesses, Affordable Housing, Credit/Lending Basics, Managing Money, Small Business Seminars, and School Savings Program.

Multistate Metropolitan Area Rating

CRA rating for the Lawrence, MA-NH Multistate MSA²: Outstanding

The lending test is rated:

Outstanding

The investment test is rated:

Outstanding

The service test is rated:

Satisfactory

High

The major factors that support this rating include:

- Geographic distribution of home mortgage was excellent throughout the assessment area;
- Borrower distribution of home mortgage and consumer loans was excellent;
- An excellent level of community development lending;
- The level of qualified community development investments and grants was excellent; and,
- Delivery systems and offices are accessible to geographies and individuals of different income levels in its assessment area.

Description of Institution's Operations in the Lawrence, MA-NH Multistate MSA

The Lawrence multistate assessment area includes all of the 75 census tracts in the MSA and covers portions of northern Massachusetts and Southern New Hampshire and includes sections of Essex and Rockingham counties. The cities of Lawrence and Haverhill are within the MSA, with Lawrence as the principal city. Fleet has the largest branch presence with 17 branches and 50 ATMs.

Refer to the Market Profile for the Lawrence, MA-NH Multistate MSA in Appendix C for detailed demographics and other performance context information.

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Fleet's performance under the lending test is rated "Outstanding" in the Lawrence MSA.

Lending Activity

Refer to Table 1 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending activity is good in the Lawrence MSA. Fleet's deposits rank 1st in the marketplace according to the 2000 FDIC Deposit Market Share Report data with a market share of 21%. Lending competition is intense for both mortgage loans and small business loans with 315 local and national HMDA reporters and 66 CRA reporters identified in this assessment area. The bank ranked 4th in home purchase lending with a market share of 3%, 1st in home improvement lending with a market share of 28% and 2nd in refinance lending with a market share of 6%. For home purchase and refinance loans a nationwide mortgage company was ranked number one. Fleet was ranked 3rd for the number of small loans to businesses with market share of 12% behind two large nationwide companies providing credit card loans. Their average loan sizes were small in comparison to Fleet's \$90 thousand. Fleet's dollar market share for small loans to businesses was 18% and in line with the bank's deposit market share.

During the evaluation period, Fleet originated 4,061 mortgage loans totaling \$378 million in the assessment area. Home mortgage lending in the MSA represents 1.87% of the number and 1.71% of the dollar amount of the bank's overall home mortgage lending. Fleet's deposits in the MSA represent a small portion of the bank's total deposits, at 1.02%. Of the total number of home mortgage loans made in the multistate MSA, approximately 48% were refinances, 33% purchase, and 19% home improvement loans. Only five multifamily loans were originated in this MSA, therefore an analysis of that data was not meaningful.

Loans to small businesses in the MSA represent 1.85% of the number and 1.59% of the dollar amount of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated 913 loans totaling \$69 million.

In addition to the home mortgage loans and small business loans, Fleet originated consumer loans and requested that we evaluate the bank's performance for this product. In the Lawrence MSA, these loans represent 2.28% of the number and 2.32% of the dollar amount of the bank's overall volume of consumer loans. During the evaluation period, Fleet originated 14,190 loans totaling \$125 million. Loan types included in this category consist of home equity, motor vehicle, other secured and other unsecured loans. There is no market share information data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is excellent in the Lawrence, MA-NH multistate MSA. Opportunities for lending in low-income geographies are limited as the percentage of owner occupied units in low-income geographies is only 1.68% or 1,353 units. Therefore, more consideration was given to performance in moderate-income geographies.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent in the Lawrence MSA. The portion of home purchase loans made in both the low- and moderate-income geographies very significantly exceeds the portion of owner occupied housing units. The market share in both the low- and moderate-income geographies significantly exceeded the overall market share.

Home Improvement Loans

Home improvement loan distribution is excellent in the Lawrence MSA. The portion of loans made in the low-income geographies was greater than the percentage of owner occupied housing units there. In the moderate-income geographies, the portion of loans made also exceeded the percentage of owner occupied housing units there. The market share for loans in the low- and moderate-income geographies exceeded the bank's overall market share.

Home Mortgage Refinance Loans

Home refinance loan distribution is adequate in the Lawrence MSA. The percentage of loans made in the low-income geographies was less than the percentage of owner-occupied housing units there. The percentage of lending in moderate-income geographies was less than the percentage of owner-occupied housing in those geographies. The market share for loans made in both low- and moderate-income geographies was less than bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses made in the Lawrence MSA is good. The bank's portion of small loans to businesses in both the low- and moderate-income geographies was only slightly less than the percentage of businesses located there. However, the market share for loans to businesses in low-income and moderate-income geographies exceeded the overall market share.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is adequate in the Lawrence MSA. Fleet's portion of loans to both low- and moderate-income geographies was slightly less than the percentage of households residing there.

Lending Gap Analysis

An analysis of Fleet's home mortgage, small business and consumer lending patterns did not reveal any significant or unexplained gaps in the geographic distribution in this assessment area. Although there were a few low- or moderate-income geographies where Fleet made no small business loans, there were a limited number of businesses located in these geographies.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Fleet's overall distribution of loans in the Lawrence MSA by borrower income reflects an excellent penetration among customers of different income levels.

Home Purchase Loans

Fleet's distribution of home purchase loans is excellent in the Lawrence MSA.

The borrower distribution of home purchase lending is excellent. The volume of lending to low-income borrowers was close to the portion of low-income families, but the volume of lending to moderate-income borrowers significantly exceeded the percent of such families. Further, the bank's market share for both low- and moderate-income borrowers significantly exceeded the overall market share.

Home Improvement Loans

The borrower distribution of home improvement loans is good in the Lawrence MSA.

The volume of lending to low-income borrowers was well below the percentage of low-income families defined as such. However, the bank's market share for loans made to low-income families was significantly greater than the overall market share. The volume of lending to moderate-income borrowers exceeded the percentage of such families. The market share for moderate-income borrowers exceeded the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is good in the Lawrence MSA.

The volume of lending to low-income borrowers was significantly below the portion of low-income families defined as such. The volume of lending to moderate-income borrowers significantly exceeded the percent of such families. The bank's market share for loans made to both low- and moderate-income families exceeded the overall market share. Rising home mortgage interest rates have hampered refinance opportunities, and the amount of equity recognized in a lower-priced home may not be sufficient to warrant refinancing.

Small Loans to Businesses

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

The distribution of small loans to businesses is adequate in the Lawrence MSA. The bank's percentage of loans to small businesses is significantly less the percentage of all small businesses in the assessment area. The bank's market share for loans to businesses with annual revenues of \$1 million or less was less than the overall market share for all small business loans. However, a substantial majority of small loans to businesses were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans is excellent in the Lawrence MSA. Fleet's percentage of loans to both low- and moderate-income borrowers significantly exceeded the percentage of households that are defined as low- or moderate-income.

Community Development Lending

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

Fleet has made a very high level of community development loans. This level of lending had a positive impact on the overall rating assigned to the Lending Test. During the evaluation period, originated 5 CD loans totaling \$19.1 million. This represents 15.3% of allocated Tier 1 Capital attributed to the MSA.

During the evaluation period, Fleet helped to advance the City of Methuen's redevelopment plan by granting an \$8.6 million construction loan. The proceeds of the loan financed the redevelopment of various historic mill buildings in downtown Methuen for residential use. Upon completion, the project will be funded through tax-exempt bonds issued by the Massachusetts Housing Finance Agency. The project will create 97 affordable rental units. Fleet recently renewed the construction loan and approved a new loan for \$987,000 to cover cost overruns on the project. The number of different types and sources of financing needed to provide support and permanent funding for the project points to the complexity involved in underwriting the construction loan.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions for this MSA.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: Fleet Affordable Advantage (12 / \$1.2 million), LMI Equity Loans (3 / \$30 thousand), Fleet Co-Loans (4 / \$337 thousand), BBDC Loans (148 / \$338 thousand) and Second Chance Loans (169 / \$526 thousand). In addition, Fleet originated FHA loans (123 / \$14.4 million) and State Housing Finance Authority loans (31 / \$3.3 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

- *Massachusetts Soft Second Program*: This below-market interest rate program features a 75% first and a 20% second mortgage, no points and no mortgage insurance. The second mortgage is interest only for 10 years and the interest payment may be subsidized. This program also features no points and no

mortgage insurance. Fleet originated 94 loans for \$5 million under this program.

- *Massachusetts Housing Financing Agency Home Improvement Loans:* The "Get the Lead Out" and "Septic Repair System" programs provide below-market interest rate funds and a maximum term of 20 years. Innovative and flexible features include 0% interest for owner-occupied units and 3% for non-owner occupied. For the Septic Repair program, loan amounts range from \$1,000 to \$25,000. There is also a home improvement program with a 6.25% fixed rate for a maximum term of 15 years for owner occupied properties. Fleet originated 29 loans for \$2.9 million under these programs.
- *N.A.C.A. (Neighborhood Assistance Corp of America):* The flexible features of this include higher qualifying ratios with a maximum debt ratio of 40%, and no mortgage insurance. Fleet originated 124 loans totaling \$16.1 million under this program.

INVESTMENT TEST

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

Fleet's performance under the investment test in the Lawrence MSA is rated "Outstanding" .

The level of qualified investments is excellent. Fleet originated 24 qualified investments during the evaluation period totaling \$14.3 million in the Lawrence MSA. An additional \$2.8 million of statewide investments was allocated to this assessment area based on the percentage of the bank's deposits. The volume of investments is highly responsive to the credit needs of the community and the opportunities that are present in the MSA. The bank's investments have had a positive impact on the community. The dollar volume of the investments represented 13.7% of the bank's allocated Tier 1 Capital.

The following are examples of Fleet's investments in this assessment area:

- Fleet provided \$11.7 in the form of six bond anticipation notes to support the reconstruction of a regional school that primarily serves low- and moderate-income students.
- Fleet provided a \$2.3 million in-kind donation of real estate to an organization supporting education for residents in low-income communities.
- Fleet provided a \$10 thousand grant to provide support of a Business Information Center's (BIC) counseling, financing,

technical assistance and training programs. This resource center is the Small Business Association's first bilingual and bicultural BIC in the entire country.

SERVICE TEST

Fleet's performance under the Service Test in the Lawrence MSA is rated " High Satisfactory" .

Retail Banking Services

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

Fleet's delivery systems are accessible to geographies and individuals of different income levels in its assessment area. Fleet's distribution of the 17 branches in this assessment area is good. Branches are accessible to geographies and individuals of different income levels in its assessment area. Its distribution of branches in low-income geographies significantly exceeded the percentage of the population that resides there. The distribution in moderate-income geographies is well below the population that resides there. There are three FCB branches located in this MSA which adds to Fleet's ability to address the needs of low- and moderate-income customers and small businesses.

Branch openings and closings during the evaluation period had no impact on Fleet's provision of services to low- and moderate-income individuals. During the evaluation period, Fleet did not close any branches and opened one branch in a middle-income tract.

Fleet's branch hours and services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals. Branch office hours and days of operation vary only slightly based on the convenience and needs of each branch's area. There are two supermarket branches, which also offer Sunday hours. Drive-up locations are reasonably comparable among the branches regardless of income level of the geography.

There are no material differences in services provided throughout the branch network. Fleet's standard loan and deposit products are offered at all locations.

All except 3 of the branches offer on-site ATMs. None of these branches are located in low- or moderate-income geographies. Two branches offer on-site ATM 24-hour service, one located in a low-income geography. Other on-site ATM-related services include Braille ATMs located in all three branches in low- and moderate-income geographies. Twelve ATMs offer multilingual services in

Spanish, Chinese and Korean, three of these ATMS are located in low- or moderate-income areas.

Community Development Services

Fleet provides a relatively high level of community development services. Its activities are primarily focused on consumer and small business owner education. Seminars offered include Basic Banking, First-Time Homebuyers, Individual Credit Counseling, Technical Assistance for Small Businesses, Affordable Housing, Credit/Lending Basics, Managing Money, Small Business Seminars, and School Savings Program.

These services reflect a high level of responsiveness to identified significant community needs including homebuyer education seminars and loan programs, technical assistance regarding establishment of credit and homeownership, and small business technical assistance.

Multistate Metropolitan Area Rating

**CRA rating for the New London-Norwich, CT-RI Multistate MSA³:
Outstanding**

The lending test is rated: Satisfactory High
The investment test is rated: Outstanding
The service test is rated: tanding Outs

The major factors that support this rating include:

- Lending levels that reflect a good responsiveness by Fleet to the credit needs of its assessment area;
- Good geographic distribution of home mortgage and small business loans in the assessment area;
- Good borrower distribution of home mortgage loans and excellent distribution of consumer loans;
- The positive impact of community development lending;
- An excellent level of qualified community development investments;
- An excellent distribution of branches that is readily accessible to individuals and geographies of all income levels; and,
- A good record of providing community development services.

Description of Institution's Operations in the New London-Norwich MSA

The New London-Norwich multistate assessment area is located in southeastern Connecticut and borders Rhode Island to the east and Long Island Sound to the south. It includes all of the MSA and also includes 10 non-MSA tracts in Middlesex, New London and Windham counties. Fleet ranks third in deposit market share with 13.8%, behind Citizens Bank of Connecticut at 16.4% and People's

³ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Bank at 15.6%. Fleet has the largest branch network with 21 branches and 47 ATMs.

Refer to the Market Profile for the New London-Norwich MSA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

The bank's performance under the lending test in the New London-Norwich MSA is rated " High Satisfactory" .

Lending Activity

Refer to Table 1 in the New London-Norwich Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall, lending activity is good. Fleet's deposits rank 3rd in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 14%. Lending competition is vigorous for both mortgage loans and small business loans with 248 local and national HMDA reporters and 58 CRA reporters identified in this assessment area. The bank ranked 8th in home purchase lending with a market share of 3%, 2nd in home improvement lending with a market share of 9% and 1st in refinance lending with a market share of 9%. Fleet was ranked 6th for the number of small loans to businesses with market share of 6% and ranked 3rd for banks. Fleet's average loan size was \$63 thousand and dollar market share for small loans to businesses was 8%.

During the evaluation period, Fleet originated or purchased 2,506 home mortgage loans totaling \$220.4 million in this assessment area. The number of home mortgage loans in this MSA represent 1.15% of the bank's overall mortgage lending. Fleet has 0.76% of total deposits in this MSA. Home mortgage loans originated during the evaluation period are distributed 55% to home refinance, 25% to home purchase and 20% to home improvement.

During the evaluation period, Fleet originated or purchased 616 loans to small businesses totaling \$42 million. This number of loans to small businesses represents 1.25% of the bank's overall volume of small business loans.

In addition to home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for these loans. Fleet originated 5413 consumer loans totaling \$54.4 million during the evaluation period in this MSA. The number of consumer loans represent 0.9% of the bank's overall volume of consumer loans. Market share information is not available for consumer loans. Loan types in this category include consumer auto, home equity, personal secured loans, and personal unsecured loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of lending is good. There are only three low-income geographies in this assessment area with only 235 owner-occupied units. Therefore, performance is mainly based on Fleet's performance in the moderate-income geographies.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent in the New London-Norwich MSA. Fleet's distribution of lending in low-income geographies exceeds the percentage of owner-occupied housing in those geographies. As well, the market share in low-income geographies is much more than the overall market share. The distribution of lending in moderate-income areas of the MSA exceeds the percentage of owner-occupied housing in moderate-income geographies. The market share in moderate-income geographies is slightly less than the overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is good in the New London-Norwich MSA. Fleet's originated or purchased no loans in low-income geographies. The distribution of home improvement lending in moderate-income areas of the MSA is slightly less than the percentage of owner-occupied housing in moderate-income geographies. However, the market share in moderate-income geographies exceeded the overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home refinance loans is poor in the New London-Norwich MSA. Fleet's home refinance lending in low-income geographies produced only two loans and is insufficient for analysis. The distribution of lending in moderate-income areas of the MSA is significantly less than the percentage of owner-occupied housing in moderate-income geographies. The market share in moderate-income geographies is slightly less than the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSA section of Appendix D 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 businesses in the New London-Norwich MSA is good. The percentage of loans in low-income geographies exceeds the percentage of businesses in those areas. As well, the market share for low-income geographies is more than double Fleet's overall market rate. The percentage of loans in moderate-income geographies is slightly less than the percentage of businesses in those areas. The market share for moderate-income geographies is also less than the percentage of businesses in those areas.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in the New London-Norwich MSA is adequate. The percentage of loans in low-income geographies nearly equals the percentage of households in those areas. The percentage of loans in moderate-income geographies is slightly less than the percentage of households in those areas.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous gaps. Lending of all HMDA, small business, and consumer products is assessment-area wide.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Fleet's overall distribution of home mortgage loans is good.

Home Purchase Loans

Borrower distribution of home purchase loans is good. Lending to low-income borrowers is well below the percentage of low-income families, while the distribution of lending to moderate-income families exceeded the percentage of those families. The market share for low-income borrowers exceeds the overall market share,

and the market share for moderate-income borrowers nearly equaled the overall market share.

Home Improvement Loans

Borrower distribution of home improvement loans is good. Lending to low-income borrowers is well below the percentage of low-income families, while the distribution of lending to moderate-income borrowers slightly exceeded the percentage of those families. The market share for low-income borrowers exceeds the overall market share, and the market share for moderate-income borrowers nearly equaled the overall market share.

Home Mortgage Refinance Loans

Borrower distribution of home mortgage refinance loans is adequate. Lending to low-income borrowers is well below the percentage of low-income families, and the distribution of lending to moderate-income borrowers is slightly less than the percentage of those families. The market share for low-income borrowers as well as moderate-income borrowers nearly equaled the overall market share.

Small Loans to Businesses

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

Fleet's record of making loans to businesses with gross revenues of less than \$1 million and small loans to businesses is adequate. The bank's percentage of lending is below the small business demographics in this assessment area. However, Fleet's market share for loans to businesses with annual revenues of \$1 million or less exceeded its overall market share. A significant majority, roughly 89%, of small loans were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Borrower distribution of consumer loans to low-income borrowers is excellent. The percentage of consumer loans originated slightly exceeds the percentage of low-income households. The borrower distribution of consumer loans to moderate-income borrowers significantly exceeds the percentage of moderate-income households.

Community Development Lending

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

CD lending has a positive impact on the overall Lending Test for this MSA. During the evaluation period, Fleet originated a good volume of CD loans. During the evaluation period, Fleet originated two loans totaling \$4.1 million. This level is 4.4% of allocated Tier 1 Capital attributed to this MSA. The significant CD loan was a \$4.0 million participation in a loan to a CDC that helped fund a major redevelopment project in New London. The focus of this CDC is affordable low- and moderate-income housing and small business development. Fleet was a co-leader in the bank-financing package.

Product Innovation and Flexibility

Product innovation and flexibility has a positive impact on lending in the MSA.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: Fleet Affordable Advantage (7 / \$617 thousand), LMI Equity Loans (8 / \$139 thousand), BBDC Loans (10 / \$17 thousand) and Second Chance Loans (99 / \$331 thousand). In addition, Fleet originated FHA loans (96 / \$10.6 million) and State Housing Finance Authority loans (77 / \$7.2 million).

INVESTMENT TEST

Fleet's overall performance under the Investment Test is "Outstanding". The bank's performance in the New London-Norwich Multistate MSA is excellent.

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

Qualified investments originated during the evaluation period consisted of 22 investments totaling \$7.2 million in the New London-Norwich MSA. An additional \$1.3 million of statewide investments were allocated to this assessment areas based on the percentage of the bank's deposits. The dollar volume of these investments represented 9.16% of allocated Tier 1 Capital. The volume of investments is strong in relation to the modest level of CD opportunities present in the MSA. Fleet's investments have a positive impact on the community.

The following are examples of Fleet qualified investments in this MSA:

- Fleet provided a series of grants totaling \$79 thousand to a CDC participating in New London's master revitalization plan. The area includes six low- and moderate-income geographies. The most recent grant supported research and review of plans that include 400 units of mixed-income housing and development of retail and service industries providing jobs.
- Fleet invested \$1.1 million in a LIHTC used to fund housing rehabilitation providing 71 units of low-income and 29 units of market rate apartments in a moderate-income geography.

SERVICE TEST

The bank's performance under the Service Test in the New London-Norwich MSA is rated " Outstanding" .

Retail Banking Services

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

Fleet's delivery systems offer excellent accessibility to geographies and individuals of different income levels throughout the New London-Norwich MSA. Fleet's distribution of offices located in low-income geographies significantly exceeded the distribution of the population living in such geographies. Fleet's distribution of branches in moderate-income geographies is less than the percent of population living in such geographies.

Overall, branch closures had no affect on the accessibility of retail delivery systems to low- and moderate-income individuals or geographies. During the evaluation period, two branches were closed, both were in middle-income geographies.

Fleet's hours and services offered in the MSA do not vary in ways that inconvenience any portion of the assessment area. There are no material differences in services provided throughout the branch network. A significant majority of ATMs is available in English, Spanish, Chinese, and Korean. Four of these multilingual ATMs are located in low- or moderate-income areas.

Community Development Services

Fleet's performance in providing CD services is good. Fleet conducted 43 seminars throughout the assessment area. Twelve seminars facilitated small business development and 267 participants attended. Fleet held four First Time Homebuyer and three Affordable Housing seminars focusing on individuals with low- or moderate-income and 173 participants attended.

Multistate Metropolitan Area Rating

CRA rating for the Portsmouth-Rochester NH-ME Multistate MSA⁴:

Satisfactory

The lending test is rated: **High Satisfactory**

The investment test is rated:

Outstanding

The service test is rated: **High Satisfactory**

The major factors that support this rating include:

- Lending levels that reflect a good responsiveness by Fleet to the credit needs of its assessment area;
- An overall good distribution of home mortgage loans and small business loans to all geographies;
- An overall adequate distribution of home mortgage loans to borrowers of different incomes and small size businesses;
- The positive impact of community development lending and flexible underwriting;
- An excellent level of qualified community development investments;
- A good service delivery system that is accessible to individuals and geographies of all income levels; and,
- A good record of providing community development services.

Description of Institution's Operations in the Portsmouth NH/ME MSA

The Portsmouth-Rochester multistate assessment area includes the entire MSA and is located on the New Hampshire and southern Maine seacoasts. It is about 50 miles north of Boston and includes York, Rockingham, and Strafford counties. Fleet ranked third in deposit market share with 9% as of June 30, 2000. Fleet operates 13 branches and 21 ATMs. One of these branches is located in a census tract that has not been assigned an income level. Bank of New Hampshire and Citizens Bank have larger market shares than Fleet and are considered competitors.

⁴ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the Market Profile for the Portsmouth-Rochester NH-ME MSA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

The bank's performance under the lending test in the Portsmouth-Rochester MSA is rated " High Satisfactory" .

Lending Activity

Refer to Table 1 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Overall, lending activity is good. Fleet's deposits rank 3rd in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 9%. Lending competition is vigorous for both mortgage loans and small business loans with 242 local and national HMDA reporters and 55 CRA reporters identified in this assessment area. The bank ranked 25th in home purchase lending with a market share of 1%, 2nd in home improvement lending with a market share of 18% and 1st in refinance lending with a market share of 7%. Fleet was ranked 8th for the number of small loans to businesses with market share of 5%. Fleet's average loan size was \$30 thousand and reflects responsiveness to the needs of small businesses. Fleet's dollar market share for small loans to businesses was 7%.

Home mortgage lending represents 0.83% of the number and 0.65% of the dollar amount of the bank's overall home mortgage lending. Small business lending represents 1.22% of the number and 1.15% of the dollar amount of the bank's overall small business lending. Fleet's deposits in the MSA represent 0.37% of the bank's total deposits.

During the evaluation period, Fleet originated or purchased 1,809 home mortgage loans totaling \$143.5 million in the assessment area. Home mortgage lending represents 26% of the number of loans and 62% of dollar volume of the lending of loans in the MSA. Home mortgage loans originated during the evaluation period are distributed 59% to home refinance, 27% to home improvement, and 14% to home purchase.

During the evaluation period, Fleet originated 601 loans to small businesses totaling \$51 million. Loans to small businesses in the Portsmouth-Rochester MSA represent 9% of the number of loans and 22% of dollar volume.

In addition to home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for this product. Fleet originated 4455 consumer loans totaling \$37.7 million during the evaluation period. Consumer loans represent 65% of the number and 16% of Fleet's dollar volume of loans reviewed in the

assessment area. Loan types in this category include consumer auto, home equity, personal secured loans, and personal unsecured loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. There are no low-income geographies.

The overall geographic distribution of lending is good in the Portsmouth-Rochester MSA. There are no low-income geographies in the MSA. Therefore, conclusions are made solely based moderate-income performance.

Home Purchase Loans

The geographic distribution of home purchase loans is good in the Portsmouth-Rochester MSA. The distribution of lending in moderate-income areas of the MSA is slightly less than the percentage of owner-occupied housing in moderate-income geographies. As well, the bank's market share in moderate-income geographies is very near to the overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is poor in the Portsmouth-Rochester MSA. Fleet's distribution of home improvement lending in moderate-income areas of the MSA is less than half of the percentage of owner-occupied housing in moderate-income geographies. The market share in moderate-income geographies is significantly less than the overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home refinance loans is good in the Portsmouth-Rochester MSA. The distribution of lending in moderate-income areas is slightly less than the percentage of owner-occupied housing in moderate-income geographies. As well, the market share in moderate-income geographies is less than the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses. There are no low-income geographies.

The geographic distribution of small loans to businesses in the Portsmouth-Rochester MSA is good. The percentage of loans in moderate-income geographies is very near to the percentage of businesses in those areas. The market share for moderate-income geographies slightly exceeded Fleet's overall market share.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in the Portsmouth-Rochester MSA is poor. Fleet's percentage of loans in moderate-income geographies is significantly less than the percentage of households in those areas.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous gaps. Lending of all HMDA, small business, and consumer products is assessment-area wide.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Fleet's overall distribution of home mortgage loans in the Portsmouth-Rochester MSA is adequate. The high cost of housing in this MSA limits lending opportunities, especially to low-income borrowers.

Home Purchase Loans

Borrower distribution of home purchase loans is adequate. Lending to low-income borrowers is significantly below the percentage of low-income families, and the distribution of lending to moderate-income families is similarly well below the percentage of those families. The market share for low-income borrowers is less than the overall market share, and the market share for moderate-income borrowers is near to the overall market share.

Home Improvement Loans

Borrower distribution of home improvement loans is adequate. Lending to low-income borrowers is significantly below the percentage of low-income families, and the distribution of

lending to moderate-income borrowers is similarly well below the percentage of those families. The market share for low-income borrowers and moderate-income borrowers is less than the overall market share.

Home Mortgage Refinance Loans

Borrower distribution of home mortgage refinance loans is adequate. Lending to low-income borrowers is well below the percentage of low-income families, and the distribution of lending to moderate-income borrowers is also well below the percentage of those families. However, the market share for low-income borrowers exceeds the overall market share, while the market share for moderate-income borrowers nearly equaled the overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses reflects a good responsiveness to the credit needs of smaller businesses in the Portsmouth-Rochester MSA. The bank's percentage of lending is well below the small business demographics in the assessment area. However, the market share for loans to businesses with annual revenues of \$1 million or less exceeds their overall market share for small business loans. A majority of small loans are for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Fleet's borrower distribution of consumer auto, home equity, personal secured, and personal unsecured loans reflects good distribution in the Portsmouth-Rochester MSA. The percentage of consumer loans originated to low-income borrowers is significantly less than the percentage of low-income households.

However, the percentage of consumer loans originated to moderate-income borrowers significantly exceeds the percentage of moderate-income households.

Community Development Lending

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

CD lending has a positive impact on the overall Lending Test for this multistate MSA. During the evaluation period, Fleet made a

good volume of CD loans. During the evaluation period, Fleet originated three loans totaling \$1.8 million. This level is 4.1% of allocated Tier 1 Capital attributed to the Portsmouth-Rochester MSA. An example of Fleet's CD lending:

- Fleet provided a \$1.5 million construction loan to a community development company that helped fund acquisition and construction of 20 units of affordable housing in South Berwick, Maine.

Product Innovation and Flexibility

Product innovation and flexibility has a neutral impact on lending test in this MSA.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: LMI Equity Loans (3 / \$44 thousand), BBDC Loans (6 / \$19 thousand) and Second Chance Loans (48 / \$147 thousand). In addition, Fleet originated FHA loans (12 / \$1.6 million) and State Housing Finance Authority loans (15 / \$1.3 million).

INVESTMENT TEST

The bank's performance under the investment test in the Portsmouth-Rochester MSA is rated " Outstanding" .

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

Fleet originated 6 qualified investments totaling \$2.2 million during the evaluation period, which include the portion, based on the percentage of the bank's deposits, of the assessment area's allocated statewide investments. This dollar volume of investments represents 5% of allocated Tier 1 Capital. Location specific investments in the Portsmouth-Rochester MSA total \$103 thousand. Fleet originated \$3.9 million of qualified investments prior to this evaluation period that remain on the bank's books as of the examination date. This dollar volume represents another 8.58% of allocated Tier 1 Capital. The volume of investments is strong in relation to the modest level of CD opportunities present in the MSA. Fleet's investments have a positive impact on the community. Overall, Fleet's investments were in the form of investments and grants in LIHTCs, equity, and technical assistance funds. Although the volume is high, the investments were not especially innovative or complex.

SERVICE TEST

The bank's performance under the service test in the Portsmouth-Rochester MSA is rated " High Satisfactory" .

Retail Banking Services

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

Fleet's delivery systems offer good accessibility to geographies and individuals of different income levels throughout the Portsmouth-Rochester MSA. Fleet's distribution of branches in moderate-income geographies is very near to the percent of population living in such geographies.

Overall, branch closures had no affect on the accessibility of retail delivery systems to low- and moderate-income individuals or geographies. During the evaluation period, one branch was closed and it was located in a middle-income geography.

Fleet's hours and services offered in the MSA do not vary in ways that inconvenience any portion of the assessment area. There are no material differences in services provided throughout the branch network. A significant majority of ATMs is available in English, Spanish, Chinese, and Korean, Portuguese, or French. One of these ATMs is located in a moderate-income geography.

Community Development Services

Fleet's performance in providing CD services is good. Fleet conducted 29 seminars throughout the assessment area. With a focus on individuals with low- or moderate-income, Fleet held 18 First Time Homebuyer seminars with 108 attending and one Affordable Housing sessions where four attended. Six seminars facilitated small business development with 137 attending. Continuing their target of small size businesses, employees from the Portsmouth MSA participated throughout the evaluation period in organizations that assist such businesses.

Multistate Metropolitan Area Rating

CRA rating for the Providence-Fall River, Multistate RI-MA MSA⁵:

Outstanding

The lending test is rated:

High

Satisfactory

The investment test is rated:

Outstanding

The service test is rated:

Outs

tanding

The major factors that support this rating include:

- Excellent geographic distribution of home purchase loans and small business loans in the assessment area;
- Good borrower distribution for home mortgage lending and excellent distribution for consumer lending;
- An excellent level of community development lending which was responsive to the needs of the area;
- An excellent level of qualified community development investments; and,
- A service delivery system that is readily accessible to geographies and individuals of different income levels in the assessment area.

Description of Institution's Operations in the Providence-Fall River, RI-MA Multistate MSA

Fleet's assessment area includes the entire Providence-Fall River multistate MSA plus the non-metropolitan areas within the State of Rhode Island. Within this area Fleet operates 64 branches and 157 ATMs.

Refer to the Market Profile for the Providence-Fall River MSA in Appendix C for detailed demographics and other performance context information.

⁵ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

LENDING TEST

Fleet's performance under the lending test is rated " High Satisfactory" in the Providence-Fall River MSA.

Lending Activity

Refer to Table 1 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending record in the Providence-Fall River MSA demonstrated a good responsiveness to the credit needs of its assessment areas. Fleet's deposits rank 2nd in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 28%. Lending competition is intense for both mortgage loans and small business loans with 342 local and national HMDA reporters and 85 CRA reporters identified in this assessment area. The bank ranked 1st in home purchase lending with a market share of 7%, 2nd in home improvement lending with a market share of 16% and 1st in refinance lending with a market share of 8%. Fleet was ranked 3rd for the number of small loans to businesses with market share of 18% behind two large nationwide companies providing credit card loans. Fleet's average loan size of \$118 thousand was responsive to small business credit needs. Fleet's dollar market share for small loans to businesses was 33%.

The number of home mortgage loans in the MSA represents 4.9% of the bank's overall home mortgage lending. Similarly, Fleet has 4.9% of the total bank deposits within the Providence-Fall River MSA.

During the evaluation period, Fleet originated 10,698 mortgage loans totaling \$951 million in the assessment area. The majority of the home mortgage loans originated or purchased during the evaluation period areas were refinance loans at 52%, with home purchase loans at 31%, and home improvement loans at 17%. Four multifamily loans were originated in the Providence-Fall River MSA during the evaluation period. The volume represented less than 1% of the home mortgage lending reported in the state. This was considered as positive; however, the level did not allow for further analysis.

The number of loans to small businesses in the Providence-Fall River MSA represents 8.8% of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated 4,326 small loans to businesses totaling \$400 million within the assessment area.

Fleet originated a large volume of consumer loans in this MSA and requested that we review the bank's performance for this product. The number of consumer loans in the state represent 8.5% of the

bank's overall volume of consumer loans. During the evaluation period, Fleet originated 53,056 consumer loans totaling \$431 million within the assessment area. Loan types included in this category consist of motor vehicle, home equity, other secured, and unsecured. There is no market share data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of lending reflects good penetration throughout the assessment area. The distribution of each product is described below. The low percentage (0.6%) of owner-occupied units in the low-income tracts makes it difficult for banks to make home mortgage loans to borrowers in the low-income geographies. Therefore, lending in moderate-income tracts was given more weight.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent in the Providence-Fall River MSA. Fleet's distribution of lending in the low-income areas more than doubled the percentage of owner-occupied housing units in those geographies. The market share in the low-income geographies significantly exceeded the overall market share. The distribution of lending in the moderate-income significantly exceeded the owner-occupied demographics of the areas. The market share in the moderate-income geographies also exceeded the overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is adequate in the Providence-Fall River MSA. The distribution of lending in low-income tracts was significantly below the percentage of owner-occupied housing units. The market share in the low-income tracts was also well below the overall market share. The distribution of lending in moderate-income areas was also below the percentage of owner-occupied housing units in those geographies. The market share in these geographies was similarly below the overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is adequate in the Providence-Fall River MSA. The distribution of lending in low-income tracts was significantly below the percentage of owner-occupied housing units. The market share in

the low-income tracts was below the overall market share. The distribution of lending in moderate-income areas was below the percentage of owner-occupied housing units in those geographies. The market shares in these geographies were below the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Multistate MSA section of Appendix D 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 businesses was excellent. The percentage of loans in low- and moderate-income geographies exceeded the percentage of businesses in those geographies. The market share for low- and moderate-income geographies also exceeded the overall market share.

Consumer Loans

Refer to Table 13 in the Providence-Fall River MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is good. The percentage of consumer loans originated in low-income geographies slightly exceeds the percentage of households in those tracts. The geographic distribution of consumer loans in moderate-income geographies is slightly below the percentage of households in those areas.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous gaps. Lending of all HMDA, small business, and consumer products is assessment area wide.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall distribution of loans by borrower income level reflects good penetration in the Providence-Fall River, RI-MA Multistate MSA. The cost of housing is high with a median housing value of \$133.6 thousand. The maximum level of income to be considered low-income is \$24.9 thousand making housing

unaffordable for low-income families. Therefore, lending to moderate-income families was given more consideration.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. Lending to low-income borrowers is below the percentage of low-income families, but the distribution of lending to moderate-income borrowers significantly exceeded the percentage of those families. The market share for low- and moderate-income borrowers significantly exceeded the overall market share.

Home Improvement Loans

The borrower distribution of home improvement loans is good. Lending to low-income borrowers is well below the percentage of low-income families, but the market share for low-income borrowers exceeded the overall market share. The distribution of lending to moderate-income borrowers nearly equaled the percentage of those families. The market share for moderate-income borrowers slightly exceeded the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is good. Lending to low-income borrowers is significantly below the percentage of low-income families, and the distribution of lending to moderate-income borrowers is also well below the percentage of those families. However, the market share for low- and moderate-income borrowers exceeded the overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses reflects adequate responsiveness to the credit needs of smaller businesses. The bank's percentage of lending is below the small business demographics in the assessment area. However, the market share for loans to businesses with annual revenues of \$1 million or less slightly exceeded their overall market share for small business loans. A majority of small loans were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the Multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans to low- and moderate-income borrowers is excellent. The percentage of consumer loans to low-income borrowers exceeded the percentage of low-income households. The percentage of consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households.

Community Development Lending

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

CD lending had a positive impact on the Lending Test and on the community. During the evaluation period, the bank made 30 CD loans totaling \$35.9 million. The dollar volume represents 6% of the bank's allocated Tier 1 Capital that is attributed to the Providence-Fall River MSA. Fleet has been highly responsive to the needs of the community. A couple of examples of Fleet's efforts in the revitalization process are listed below:

- Fleet has provided a series of CD loans to a foundation to acquire and renovate a theatre in a low- and moderate-income area of downtown Woonsocket. The theatre had been closed since the 1970's, and had fallen into disrepair. Fleet provided a \$175 thousand loan to finance the acquisition of the theatre, a \$350 thousand loan, in conjunction with a Community Development Block Grant, to fund construction and \$274 thousand term loan to support the theatre's redevelopment. This project will help stabilize the surrounding low- and moderate-income communities by returning a visibly distressed and chronically vacant property in Woonsocket's downtown area to active use.
- Fleet granted a \$3.1 million loan to an organization to fund the rehabilitation of an inactive and gutted factory building. This loan will help to revitalize a low- income area that is within the federally designated Providence Enterprise Zone. As a requirement, the project site will undergo environmental remediation to clean up contamination from previous industrial uses. Upon completion, the property will provide freshly developed office space.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test in this area.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: Fleet Affordable Advantage (11/\$932,645), LMI Equity Loans (15/\$243,300), Fleet Co-Loans (3/\$375,000), BBDC Loans (720/\$6.7 million) and Second Chance Loans (791/\$2,.2 million). In addition, Fleet originated FHA loans (352/\$36.0 million) and State Housing Finance Authority loans (191/\$16.2 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

- *Massachusetts Soft Second Program*: This below-market interest rate program is offered in 27 communities in Massachusetts. The program features a 20% second mortgage. The second mortgage payment is interest only for 10 years and the interest payment may be subsidized. The program also features no points and no mortgage insurance. Fleet has committed \$300 million to the program over five years. Fleet has originated 82 loans totaling \$4.4 million
- *Jumpstart*: A partnership between Fleet and the state mortgage financing agencies in four states (Rhode Island, New Hampshire, New York and New Jersey). Fleet provides an unsecured loan at the time the agency originates the first mortgage. The unsecured loan is at the first mortgage rate and covers downpayment and closing costs. Fleet originated 24 loans under this program for \$137 thousand.

INVESTMENT TEST

The bank's performance under the investment test in the Providence-Fall River MSA is rated " Outstanding" .

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

The level of qualified investments is excellent. Fleet originated 115 qualified investments totaling \$27.3 million. An additional, \$1 million in statewide investments was allocated to this assessment area based on the percentage of the bank's deposits. The dollar volume of the investments represented 5% of the bank's allocated Tier 1 Capital. In addition, Fleet originated 6 qualified investments totaling \$7 million or 1.2% of allocated Tier 1 Capital prior to the evaluation period that remain on the bank's books as of the examination date. The volume of investments is highly responsive in relation to the level of CD opportunities that are present in the multistate MSA.

The bank's investments have had a positive impact on the community.

The majority of the number of investments were CRA grants. However, the bulk of the dollars were invested in municipal investments, LIHTCs, and technical assistance funds. Some investment highlights are as follows:

- A \$5.95 million LIHTC investment in Bristol, Rhode Island took advantage of several government-supported programs to make rental housing affordable to low- and moderate-income seniors. This development involved the rehabilitation of three vacant buildings into 92 units of affordable assisted living. The subject facility is adjacent to an existing 96 units of affordable elderly housing. Through the use of various forms of tax credits, the project was able to utilize equity as the primary source of construction funding. This assisted living complex has been allocated 68 Medicare Waivers. The remaining 24 units will be market rate. This investment is innovative because of its use of the Medical Waiver Program, which is just beginning to be used in Rhode Island.
- A \$1.75 million LIHTC investment in South Providence provided the rehabilitation of 30 units of rental housing. Fleet's investment in these buildings enabled the completion of renovations necessary to protect and preserve the units for affordable housing. Additional financing sources utilized to complete this project included two loans from Rhode Island Housing Finance Agency and grants provided by city and state HOME programs.

SERVICE TEST

Retail Banking Services

The bank's performance under the service test in the Providence-Fall River MSA is rated " Outstanding" .

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

Fleet's distribution of branches in the Providence-Fall River MSA is readily accessible to geographies and individuals of different income levels. Fleet operates 64 branches in the MSA with 3 branches or 4.69% in the low-income tracts. There are 11 branches or 17.19% in the moderate-income branches. The distribution of branches in the low-income tracts is excellent compared to the 2.29% of the population that live in low-income geographies. The distribution of branches in the moderate-income tracts is good compared to the 19.31% of the population that live in moderate-income tracts. In addition, Fleet operates three FCB

branches in this MSA, which improves access to services for low- and moderate-income individuals and small businesses.

During the evaluation period, there were five branch openings and nine closings. The net result was that three branches were closed in the moderate-income tracts and one in the middle-income tracts. The branch closures did not affect the accessibility of retail delivery systems to low- or moderate-income individuals and geographies. Fleet operates other branches that are accessible to low- and moderate-income geographies in those cities where offices were closed.

Fleet's hours and services offered in the Providence-Fall River MSA do not vary in a way that inconveniences any portion of the assessment area. There are no material differences in services provided throughout the branch network. Branch office hours and days of operation vary based on the convenience and needs of each branch's area. All branches have on-site ATMs. A majority of the branches also offer bilingual or multilingual ATM services including Spanish, Chinese, Korean, Portuguese, and French. In addition, Braille and 24-hour service are offered at these ATMs.

Nearly all of the branches within low- or moderate-income geographies offer multilingual ATM services.

Community Development Services

Fleet's performance in providing community development services is good in the Providence-Fall River, RI-MA multistate MSA and has had a positive impact. During the evaluation period, several bank employees have provided technical assistance to numerous groups. Technical assistance was provided throughout the evaluation period and co-sponsored with the local community organizations. Seminars include First-Time Homebuyers, Small Business, Basic Banking, Managing Money, and School Savings. These seminars were targeted to low- or moderate-income individuals as well as students.

State Rating

CRA Rating for the State of Connecticut ⁶ : <u>Satisfactory</u>	
The lending test is rated:	—
<u>High Satisfactory</u>	
The investment test is rated:	—
<u>High Satisfactory</u>	
The service test is rated:	—
<u>Outstanding</u>	

The major factors that support this rating include:

- Lending levels reflect good responsiveness to assessment area credit needs;
- Geographic distribution of all loan types reflects good penetration throughout the assessment area;
- Borrower distribution was good for home mortgage and small businesses and excellent for consumer lending;
- A good level of qualified community development investments and grants; and,
- Delivery systems and offices are readily accessible to geographies and individuals of different income levels in its assessment area.

Description of Institution's Operations in Connecticut

Fleet has six assessment areas within the State of Connecticut. They are Hartford MSA, Bridgeport MSA, Danbury MSA, New Haven MSA, Stamford MSA and Waterbury MSA. Fleet has 156 branches within the state. The bank ranked first in the state for deposit market share with 23% of deposits. The State of Connecticut contains 13.82% of Fleet's total deposits. As a percentage of the bank's total loan originations in this state, home mortgages comprise 10.95%, small business loans are 14.01%, and consumer loans are 10.35%.

Refer to the Market Profiles for State of Connecticut in Appendix C for detailed demographics and other performance context information for the two assessment area that received full-scope reviews.

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Connecticut

We selected the Hartford and Bridgeport MSAs for full-scope reviews. We reviewed the volume of deposits, branch network, loan market share, and number of complaints to determine full-scope areas. The Danbury, New Haven, Stamford and Waterbury MSAs received limited-scope reviews.

The Hartford MSA contains 59% of deposits and 44% of the number of total loans in the state. The Bridgeport MSA contains 10% of the total deposits and 13% of the total loans in the state. The overall performance in Connecticut was weighted by the percent of deposits generated in each assessment area. Refer to the Scope of Evaluation Table in the Appendix A for information on the names of the counties included in each assessment area.

During the examination, we considered information from community organizations from the areas that were subject to full-scope reviews. Information from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Connecticut is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Hartford and Bridgeport MSAs is good.

Lending Activity

Refer to Table 1 in the State of Connecticut section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending activity is good in the Hartford and Bridgeport MSAs and represents good responsiveness to the credit needs of its assessment areas. In the Hartford MSA, Fleet's deposits rank 1st in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 36%. Lending competition is intense for both mortgage loans and small business loans with 343 local and national HMDA reporters and 91 CRA reporters identified in this assessment area. The bank ranked 7th in home purchase lending with a market share of 3%, 1st in home improvement lending with a market share of 17% and 1st in refinance lending with a market share of 9%. Fleet was ranked 3rd for the number of small loans to businesses with market share of 11% behind two large nationwide companies providing credit card loans. Fleet's average loan size of \$71 thousand was responsive to the needs of small businesses. Fleet's dollar market share for small loans to businesses was 14%. In the Bridgeport MSA,

Fleet's deposits rank 2nd in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 19%.

Lending competition is intense for both mortgage loans and small business loans with 285 local and national HMDA reporters and 75 CRA reporters identified in this assessment area. The bank ranked 5th in home purchase lending with a market share of 4%, 1st in home improvement lending with a market share of 25% and 2nd in refinance lending with a market share of 9. Fleet was ranked 5th for the number of small loans to businesses with market share of 6% behind two large nationwide companies providing credit card loans and two banks. Fleet's dollar market share for small loans to businesses was 10%.

During the evaluation period, Fleet originated or purchased 23,750 home mortgage loans totaling \$2.5 Billion in the State of Connecticut. Home mortgage lending in the State of Connecticut represents 11% of the number and 11% of the volume of the bank's overall home mortgage lending. Fleet generated 13.8% of its total deposits in the state.

The Hartford MSA represents 38% of the number and 32% of the dollar volume of mortgage loans originated or purchased within the State of Connecticut. Fleet ranks first in the Hartford MSA with a deposit market share 36%. Of the total number of home mortgage loans made in the Hartford MSA, approximately 56% were refinances, 24% purchase, and 20% home improvement loans. Only four multifamily loans were originated in the Hartford MSA, therefore an analysis of that data was not meaningful.

The Bridgeport MSA represents 18% of the number and 16% of the dollar volume of home mortgage loans originated or purchased within the State of Connecticut. Fleet ranks second in this MSA with a deposit market share of 19%. Of the total number of home mortgage loans made in the Bridgeport MSA, approximately 49% of the number of home mortgage loans made were refinances, 28% home purchase, and 23% home improvement loans.

Loans to small businesses in the State of Connecticut, excluding the Multistate MSA, represents 14% of the number and 13% of the dollar amount of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated 6,907 loans totaling \$562 million.

The small business lending in the Hartford MSA represents 47% of the number and 48% of the dollar volume of loans originated within the state. The small business lending in the Bridgeport MSA represents 13% of the number and 11% of the dollar volume of loans originated in the state.

In addition to the home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for these products. During the evaluation period, Fleet originated 64,359 loans totaling \$702 million in the state. This represents 10% of the number and 13%

of the dollar volume of the bank's overall volume of consumer loans. The Hartford MSA represents 45% of the number and 40% of the dollar volume of loans originated within the State of Connecticut. The Bridgeport MSA represents 11% of the number and 12% of the dollar volume of loans originated in Connecticut. Loan types included in this category consist of home equity, motor vehicle, other secured and other unsecured loans. There is no market share information data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending good in both the Hartford and Bridgeport MSAs.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent in both the Hartford and Bridgeport MSAs.

In the Hartford MSA, the percentage of home purchase loans made in low-income geographies exceeded the percentage of owner-occupied housing units. The market share in low-income geographies significantly exceeded the overall market share. In the moderate-income geographies the percentage of home purchase loans nearly equaled the percentage of owner-occupied housing units. The market share in moderate-income geographies was less than the overall market share.

In the Bridgeport MSA, the percentage of home purchase loans made in both the low- and-moderate income geographies far exceeded the percentage of owner-occupied housing units in those geographies.

In addition, the market share in both the low- and-moderate income geographies exceeded the bank's overall market share.

Home Improvement Loans

Home improvement loan distribution is poor in the Hartford MSA and Bridgeport MSAs.

In the Hartford MSA, the percentage of home improvement loans made in both the low- and-moderate income geographies was significantly less than the percentage of owner-occupied housing units there. In addition, the market share for loans made in both low- and moderate-income geographies were well below the bank's overall market share.

In the Bridgeport MSA, the percentage of home improvement loans made in both the low- and-moderate income geographies was significantly less than percentage of owner-occupied housing units there. Only 33 loans were originated or purchased within these geographies. In addition, the market share for loans in both low- and moderate-income geographies was well below the bank's overall market share.

Refinance Loans

Home refinance loan distribution is adequate in the Hartford and poor in the Bridgeport MSA. In both MSAs, the percentage of home refinance loans made in both the low- and-moderate income geographies was below the percentage of owner-occupied housing units there. However, in the Hartford MSA, the market share for loans in low-income geographies nearly equaled the bank's overall market share while the market share in moderate-income geographies was less than the overall market share. In the Bridgeport MSA, the market share for loans in both low- and moderate-income geographies was well below the bank's overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Connecticut section of Appendix D 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 businesses originated or purchased in the Hartford MSA was excellent and in the Bridgeport MSA was good.

In the Hartford MSA, the bank's percentage of small loans to businesses in both the low- and moderate-income geographies exceeded the percent of businesses located there. In addition, the respective market share for loans made to businesses in these geographies exceeded the bank's overall market share.

In the Bridgeport MSA, the percentage of small loans to businesses in low-income geographies was less than the percentage of businesses located there, and in the moderate-income geographies it exceeded the percentage of businesses. However, the respective market share for loans in these geographies was slightly lower than the overall market share.

Consumer Loans

Refer to Table 13 in the State of Connecticut section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases. The geographic distribution of consumer loans is adequate in both the Hartford and Bridgeport MSAs.

In the Hartford MSA, Fleet's percentage of loans to low-income geographies was below the percentage of households. The distribution of lending in moderate-income geographies nearly equaled the percentage of households. In the Bridgeport MSA, Fleet's percentage of loans to low-income geographies was well below the percentage of households and the percentage of loans to moderate-income geographies was slightly less than the percentage of households.

Lending Gap Analysis

In the Hartford and Bridgeport MSAs, the analysis of Fleet's home mortgage, small business and consumer lending patterns did not reveal any gaps in the geographic distribution in this assessment area. Although there were a few low-or moderate-income geographies where Fleet made no small business or consumer loans, the gaps were the result of a limited number of businesses and a low number of households with high poverty levels.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is good in the Hartford and Bridgeport MSAs.

Home Purchase Loans

Fleet's distribution of home purchase loans is excellent in the Hartford and Bridgeport MSAs.

In the Hartford MSA, the percentage lending to low-income borrowers was less than the percentage of low-income families. However, the percentage of loans to moderate-income borrowers significantly exceeded the percentage of such families. The bank's market share for low-income borrowers exceeded the overall market share, and market share for moderate-income borrowers was slightly less than the overall market share.

In the Bridgeport MSA, the percentage of loans to low-income borrowers nearly equaled the percentage of families. However, the percentage of loans to moderate-income borrowers significantly exceeded the percent of such families. In addition, the bank's market share for low-income and moderate-income borrowers significantly exceeded the overall market share.

Home Improvement Loans

Distribution of home improvement loans to borrowers of different income levels is good in the Hartford and Bridgeport MSAs

In the Hartford MSA, the percentage of loans to low-income borrowers was less than the percent of families defined as such.

However, the bank's market share for loans to low-income families greatly exceeded the bank's overall market share. The percentage of loans to moderate-income borrowers nearly equaled the percentage of families. The market share for moderate-income borrowers is less than the overall market share.

In the Bridgeport MSA, the percentage of loans to low-income borrowers was less than the percentage of families defined as such. The percentage of loans to moderate-income families slightly exceeded the percent of such families. The bank's market share for loans made to low- or moderate-income families was slightly less than the overall market share.

Refinance Loans

Fleet's distribution of home refinance loans is adequate in the Hartford MSA and good in the Bridgeport MSAs.

In the Hartford MSA, the percentage of loans to low-income borrowers was well below the percentage of families. The percentage of loans to moderate-income borrowers nearly equaled percentage of such families. However, the market share for loans made to low-income borrowers exceeded the bank's overall market share and the market share for loans to moderate-income borrowers nearly equaled the overall market share.

In the Bridgeport MSA, the percentage of loans made to low-income borrowers was well below the percentage of families. However, the market share of lending to low-income families exceeded the overall market share. The percentage of loans to moderate-income borrowers exceeded the percentage of such families. In addition, the market share for loans to moderate-income borrowers exceeded the bank's overall market share.

Small Loans to Businesses

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

Distribution of small loans to businesses is adequate in both the Hartford and Bridgeport MSAs. In both MSAs, the bank's percentage of loans to small businesses is significantly less than the percentage of all small businesses in the assessment area. In both MSAs, the bank's market share for loans to businesses with annual revenues of \$1 million or less was less than the overall market share for all small business loans.

However, a substantial majority of small loans to businesses were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the State of Connecticut section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Fleet's borrower distribution of consumer loans is excellent in both the Hartford and Bridgeport MSAs. In both MSAs, the bank's percentage of loans made to low-income borrowers exceeded the percentage of low-income households, and the percentage of loan made to moderate-income borrowers significantly exceeded the percentage of moderate-income households.

Community Development Lending

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

CD lending had a positive impact in the Hartford MSA and a neutral impact in the Bridgeport MSA.

Fleet originated 33 CD loans totaling \$76.3 million during the evaluation period in the Hartford MSA and 2 CD loans totaling \$1.0 million in the Bridgeport MSA. This dollar volume represents 8% and 1% of the bank's allocated Tier 1 Capital that is attributed to the Hartford and Bridgeport assessment areas, respectively. In the Hartford MSA structuring affordable housing and other community development deals is very challenging and labor intensive. These difficulties resulted in only a few larger scale projects each year, thus creating a high level of competition among the area banks.

In the Hartford MSA, the following are examples of Fleet's CD lending:

- Fleet took a leadership role in a multi-faceted, complex affordable housing development by financing a total of \$771 thousand in construction and permanent financing for this redevelopment project in Hartford.
- The bank again took a leadership role by providing a \$14 million loan in the comprehensive revitalization of a low-income area in Hartford. This is part of a larger redevelopment project for the area, which included demolishing large housing projects and creating affordable single family homes, and developing retail facilities including a large grocery store.

In the Bridgeport MSA, the following is an example of Fleet's CD Lending:

- Fleet originated a \$500 thousand loan whose purpose was to cover the soft costs associated with renovating hospital facilities where Medicaid accounts for a majority of the revenues.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions for the full scope MSAs.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within the Hartford MSA, the following loans have been originated: Fleet Affordable Advantage (13 / \$1.2 million), LMI Equity Loans (11 / \$217 thousand), Fleet Co-Loans (3 / \$631 thousand), BBDC Loans (255 / \$2.2 million) and Second Chance Loans (411 / \$1.2 million). In addition, Fleet originated FHA loans (177 / \$19.4 million) and State Housing Finance Authority loans (127 / \$11.5 million). In the Bridgeport MSA, the following loans have been originated: Fleet Affordable Advantage (30 / \$3.6 million), LMI Equity Loans (10 / \$201 thousand), BBDC Loans (28 / \$117 thousand) and Second Chance Loans (113 / \$374 thousand). In addition, Fleet originated FHA loans (158 / \$16.5 million) and State Housing Finance Authority loans (90 / \$8.9 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

- H.A.R.T. (Hartford Area Rallies Together)/ Urban League) mortgage product: This mortgage product for low- or moderate-income families offers below market rates. Fleet originated 95 loans for \$8.5 million under this program.
- ACORN mortgage product: This program features a below market rate and 97% to 95% financing and flexible underwriting criteria. Fleet originated 102 loans for \$9.6 million under this program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Danbury, New Haven, Stamford, and Waterbury MSAs was not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Connecticut. Refer to Tables 1 through 13 in the State of Connecticut section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Fleet's performance under the investment test in Connecticut is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Hartford MSA is good and in the Bridgeport MSA is adequate.

In the Hartford MSA, the level of qualified investments is good. During the evaluation period, Fleet made 141 qualified investments totaling \$13.6 million. In addition, \$14.6 million in statewide investments were allocated to this assessment area based on the percentage of the bank's deposits. Qualified investments represent 2.81% of allocated Tier 1 Capital. In addition, three LIHTCs investments totaling \$2.5 million were made prior to this evaluation period and are still outstanding. While the dollar volume of investments was good, the investments were not especially innovative or complex.

The majority of investments in the Hartford MSA were in the form of LIHTC. During the evaluation period, five LIHTC investments were made for a total of \$11 million. These will provide affordable housing which has been identified as a need in this MSA.

In the Bridgeport MSA, the level of qualified investments was adequate. During the evaluation period, Fleet made 39 qualified investment totaling \$460 thousand. An additional \$2.5 million was allocated to this assessment area based on the percentage of the bank's deposits. Qualified investments represent 1.72% of allocated Tier 1 Capital. In addition, three LIHTC totaling \$2.2 million were made prior to this evaluation period and are still outstanding.

While Fleet was not awarded any LIHTC deals in the Bridgeport MSA during the evaluation period, the bank closely tracks these deals in the state and actively bids on the limited opportunities that have presented themselves in the Bridgeport market.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Danbury, New Haven, Stamford, and Waterbury MSAs is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in the State of Connecticut. Refer to the Table 14 in the State of Connecticut section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Connecticut is rated " Outstanding" . Based on full-scope reviews, the bank's performance in the Hartford and Bridgeport MSAs was excellent.

Retail Banking Services

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

Fleet's delivery systems are readily accessible to geographies and individuals of different income levels throughout the full-scope assessment areas. In both MSAs, the distribution of branches, 64 in the Hartford MSA and 24 in the Bridgeport MSA, is excellent. In both MSAs, the distribution of branches in low-income geographies exceeds the percentage of the population that resides there, and in moderate-income geographies is close to the percentage of the population that resides there. Additionally, Fleet operates five FCB branches in the Hartford MSA and three FCB branches in the Bridgeport MSA. These branches enhance Fleet's presence within low- or moderate-income geographies by providing a higher level of service.

In the Hartford MSA, on a net basis, branch openings and closings had no affect on the accessibility of retail delivery systems to low- and moderate-income individuals and geographies. During the evaluation period, Fleet closed 15 branches, three in moderate-income geographies. Other branches were located close to these branches that were closed.

In the Bridgeport MSA, branch openings and closings had no adverse affect on the accessibility of retail delivery systems to low- or moderate-income individuals and geographies. Two branches were closed in middle income census tracts. No branches were opened.

Fleet's branch hours and services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or individuals. There are no material differences in services provided throughout the branch network. Fleet's standard loan and deposit products are offered at all locations.

In both full-scope MSAs, drive-up locations are reasonably comparable among the branches regardless of income level of the geography. The majority of the ATMs offer multilingual services in Spanish, Chinese, Korean, and Portuguese. Other on-site ATM-related services include Braille ATMs and drive-up ATMs located throughout the MSA. In the Hartford MSA, ten multilingual ATMs

are located in low- or moderate-income geographies. In the Bridgeport MSA, there are six located in low- or moderate-income areas.

Community Development Services

Fleet provides a relatively high level of community development services in both full-scope MSAs. Its numerous and frequent activities in the form of external seminars and technical assistance are primarily focused on consumer and small business owner education. Seminars offered include Basic Banking, First-Time Homebuyers, Individual Credit Counseling, Technical Assistance for Small Businesses, Affordable Housing, Credit/Lending Basics, Managing Money, On-Line Banking, Small Business Seminars, and School Savings Program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Danbury, New Haven, Stamford and Waterbury MSAs is not inconsistent with the bank's overall "Outstanding" performance under the service test in Connecticut. Refer to Table 15 in the State of Connecticut section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for the State of Florida: Satisfactory

The lending test is rated:

Low

Satisfactory

The investment test is rated:

Outstanding

The service test is rated:

Low

Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to assessment area credit needs;
- Geographic distribution of home mortgage and consumer loans reflects adequate penetration throughout the assessment area;
- The distribution of borrowers for home mortgage and consumer loans reflects adequate penetration among customers of different income levels;
- An excellent level of qualified community development investments and grants; and,
- Delivery systems and offices are reasonably accessible to geographies and individuals of different income levels in its assessment area.

Description of Institution's Operations in the State of Florida

Fleet has two assessment areas in the State of Florida. They are West Palm Beach MSA and Sarasota MSA. Fleet has a very limited presence in this market with four branches and two ATMs. One of the branches in the West Palm MSA and the only branch in the Sarasota MSA have limited hours and services focusing on private banking clients. The bank's market share of deposits in the state is very small at 0.06%.

Refer to the Market Profile for the State of Florida in Appendix C for detailed demographics and other performance context information for the West Palm Beach MSA.

Scope of Evaluation in Florida

We selected the assessment area for a full-scope review based on the volume of deposits and loans. In the State of Florida, the West Palm Beach MSA received a full-scope review and the Sarasota MSA received a limited-scope review.

The West Palm Beach MSA was more heavily weighted in arriving at the overall conclusions of the bank's performance in the state. This MSA contains 94% of the bank's total deposits from the state and 77% of the total loans in the state. Fleet is ranked twenty-first in deposit market share in the MSA. The Sarasota MSA contains only one branch with limited hours and services and is primarily available to private banking clients.

As part of the evaluation, we considered information from community organizations from the area that was subject to a full-scope review. Information from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Florida is rated "Low Satisfactory". Based on a full-scope review of the bank's performance in the West Palm Beach MSA is adequate.

Lending Activity

Refer to Table 1 in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending activity is adequate in the State of Florida based on adequate performance in the West Palm Beach MSA. Fleet's deposits are limited in this assessment area with only 0.6% of the market share according the 2000 FDIC Deposit Market Share Report data. Lending competition is intense for both mortgage loans and small business loans with 490 local and national HMDA reporters. The bank ranked 10th in home purchase lending with a market share of 2%, 15th in home improvement lending with a market share of 1% and 8th in refinance lending with a market share of 2%. Fleet's small business lending was insignificant.

During the evaluation period, Fleet originated 5,079 home mortgage loans totaling \$568 million in the state. Home mortgage lending in the State of Florida represents 2.34% of the number and 2.57% of the dollar amount of the bank's overall home mortgage lending. Fleet generated only 0.14% of its total deposits in the state.

The West Palm Beach MSA represents 77% of the number and 78% of the dollar volume of reportable loans originated or purchased in the State of Florida. Of the total number of home mortgage loans made in the West Palm Beach MSA, approximately 66% were home purchase, 31% home mortgage refinance, and 3% home improvement loans. Fleet's market shares for these home mortgage products were 2%, 2% and 1%, respectively.

Fleet only originated or purchased 28 small loans to businesses during the evaluation period. Therefore, it is not meaningful to conclude on this product type.

In addition, Fleet originated a significant volume of consumer loans and requested that we evaluate their performance for this product. The number of consumer loans in the state represent 0.14% of the number and 0.29% of the dollar amount of the bank's overall volume of consumer loans. During the evaluation period, Fleet originated 845 loans totaling \$15 million. Loan types included in this category consist of home equity, motor vehicle, other secured and other unsecured loans. There is no market share information data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is adequate in the West Palm Beach MSA. Opportunities for lending in the low-income geographies are limited as the percentage of owner occupied units is only 0.94% or 2,446 units. Therefore, more weight was placed on performance within moderate-income geographies.

Home Purchase Loans

Home purchase loan distribution is adequate. The percentage of home purchase loans made in both the low- and-moderate income geographies was significantly less than the percentage of owner-occupied housing units. However, the market share for loans made in moderate-income tracts slightly exceeded the bank's overall market share and the market share in low-income tracts nearly equaled the overall share.

Home Improvement Loans

Home improvement loan distribution is poor. There were no loans originated or purchased in low-income census tracts. The percentage of home improvement loans in moderate-income geographies was far below the percentage of owner-occupied housing units there. In addition, the market share for loans in moderate-income geographies was insignificant as compared to bank's overall market share.

Home Mortgage Refinance Loans

Home refinance loan distribution is poor. The percentage of refinance loans made in the low-income geographies was insignificant. The percentage of loans made in moderate-income geographies was significantly below the percentage of owner-occupied housing units there. In addition, the market share for loans in moderate-income geographies was significantly below the bank's overall market share.

Consumer Loans

Refer to Table 13 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is adequate in the West Palm Beach MSA. There were no loans made in low-income tracts, however a low 3% of the population reside in low-income tracts. For moderate-income geographies, the bank's percentage of loans was less than the percentage of households.

Lending Gap Analysis

An analysis of Fleet's home mortgage and consumer lending patterns did not reveal any significant or unexplained gaps in the geographic distribution in this assessment area. Although there were several low- or moderate-income geographies where Fleet originated or purchased no loans, the gaps appear to be the result of a limited market presence.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is adequate based on Fleet's performance in the West Palm Beach MSA.

Home Purchase Loans

Fleet's distribution of home purchase loans to borrowers of different income levels is good in the West Palm Beach MSA. Home purchase loans made to low-income borrowers were significantly less than the percentage of low-income families. However, the market share for loans made to low-income borrowers slightly exceeded the bank's overall market share. The percentage of home purchase loans to moderate-income borrowers slightly exceeded the percentage of moderate-income families. The market share for

loans made to moderate-borrowers nearly equaled the overall share.

Home Improvement Loans

Fleet's distribution of home improvement loans to borrowers of different income levels is adequate in the West Palm Beach MSA. Home improvement loans made to low-income borrowers were one-sixth of the percentage of the low-income families, and the market share for loans made to low-income borrowers was less than the overall share. The percentage of home improvement loans to moderate-income borrowers slightly exceeded the percentage of moderate-income families. The market share for loans made to moderate-borrowers also slightly exceeded the bank's overall share.

Home Mortgage Refinance Loans

Fleet's distribution of home refinance loans to borrowers of different income levels is adequate in the West Palm Beach MSA. Home refinance loans to low-income borrowers were one-third the percentage of low-income families. The market share for loans to low-income borrowers was less than the overall share. The percentage of home refinance loans to moderate-income borrowers was slightly less than the percentage of moderate-income families. The market share for loans to moderate-borrowers was also slightly less than the bank's overall market share.

Consumer Loans

Refer to Table 13 in the State of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans is good in the West Palm Beach MSA. The bank's percentage of loans to low-income borrowers was less than the percentage of low-income households. The percentage of loans to moderate-income borrowers slightly exceeded the percentage of moderate-income households.

Community Development Lending

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

Fleet has made a low level of community development loans. The bank originated only 1 CD loan for \$200 thousand during the evaluation period in the West Palm Beach MSA. This level of lending had a neutral impact on the overall rating assigned to the Lending Test. During the evaluation period, the dollar volume of community development loans originated in West Palm Beach represents 1.21% of the bank's allocated Tier 1 Capital.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the Lending Test conclusions for the full scope MSA.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: BBDC Loans (3 / \$2 thousand) and Second Chance Loans (3 / \$10 thousand). In addition, Fleet originated FHA loans (10 / \$780 thousand).

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the Sarasota MSA is weaker than the bank's overall "Low Satisfactory" performance under the lending test in Florida. However, this was not considered to be material to the rating due to Fleet's limited presence in this MSA. Refer to the Tables 1-11 and Table 13 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the investment test in Florida is rated "Outstanding". Based on a full-scope review, the bank's performance in the West Palm Beach MSA is excellent.

The level of qualified investments is excellent. During the evaluation period, Fleet made 27 qualified investments totaling \$6.6 million in the West Palm Beach MSA. This dollar volume represents 40.17% of allocated Tier 1 Capital. In addition, Fleet has one investment for \$821 thousand that was made prior to this evaluation period and is still outstanding. While the dollar volume of investments was excellent, the investments were not especially innovative or complex.

During the evaluation period, Fleet took a leadership role in an investment for \$6.4 million. This LIHTC was for new construction of a multifamily residential rental development in Palm Beach County creating 288 affordable housing units.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Sarasota MSA is weaker than the bank's overall "Outstanding" performance under the investment test in Florida. This weaker performance was not considered to be material to the rating due to Fleet's limited presence in this MSA. The Sarasota branch has only been a full service branch since February 2000.

Refer to the Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Florida is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the West Palm Beach MSA is adequate.

Retail Banking Services

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

Fleet's delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area. Fleet's distribution of the three branches in this assessment area is adequate. There are no branches in low-income geographies. The one branch in a moderate-income geography exceeds the population that resides there. One branch is in upper income geography, and one of the branches is in an "income N/A" census tract. During the evaluation period, no branches have been opened or closed.

Fleet's branch hours and services are adequate. They do not vary in a way that inconveniences its assessment area, particularly low-and moderate-income geographies and/or individuals. There are no weekend hours. A drive-up location is available only at the upper income branch. Two branches offer on-site ATM 24-hour service, including the one located in a moderate-income geography. These two ATMs also offer Braille and multilingual services in Spanish.

There are no material differences in services provided throughout the branch network. Fleet's standard loan and deposit products are offered at all locations.

Community Development Services

Fleet provides a relatively high level of community development services. Its numerous activities in the form of external seminars and technical assistance are primarily focused on consumer and small business owner education. Seminars offered include Basic Banking, First-Time Homebuyers, and Individual Credit Counseling, Technical Assistance for Small Businesses,

Affordable Housing, Credit/Lending Basics, and Small Business Seminars.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the service test in the Sarasota MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Florida. Refer to Table 15 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for State of Maine⁷:

	<u>Sati</u>
<u>sfactory</u>	
The lending test is rated: <u>Satisfactory</u>	<u>High</u>
The investment test is rated: <u>Outstanding</u>	
The service test is rated: <u>Satisfactory</u>	<u>High</u>

The major factors that support this rating include:

- Good geographic distribution of home mortgage and an excellent distribution of small business loans in the assessment area;
- Good borrower distribution for home mortgage lending and consumer lending;
- The positive impact of community development lending and flexible underwriting;
- An excellent level of qualified community development investments;
- A good service delivery system that is accessible to geographies and individuals of different income levels in the assessment area; and,
- A good record of providing community development services.

Description of Institution's Operations in Maine

Fleet has five assessment areas within the State of Maine. The areas that we included in our review consisted of the Portland MSA, Bangor MSA, Lewiston MSA, and two non-metropolitan areas of Maine. As of June 30, 2000, Fleet ranked third among their peers in the State of Maine with respect to deposit market share. Fleet's market share was 9.3% compared to the market leader at 21.3% and the next competitor at 14%. As of our examination date, Fleet had 53 branches within the State of Maine.

Refer to the Market Profiles for the State of Maine in Appendix C for detailed demographics and other performance context

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maine

We selected the Portland Assessment Area for full-scope review. The Portland MSA contains 57% of Fleet's \$1.2 billion in deposits within the state and 35% of the total loans. Total deposits within the State of Maine represent 1.3% of total Fleet deposits.

All other assessment areas received limited-scope reviews. Refer to the Scope of the Evaluation table in Appendix A for more information on the names of the counties included in each assessment area.

The overall performance of the bank in Maine was weighted by the percent of deposits generated in each assessment area.

During this examination, we considered information from community organizations in the full-scope area. Information obtained from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Maine is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Portland MSA is good.

Lending Activity

Refer to Table 1 in the State of Maine section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending record in Maine represents a good responsiveness to the credit needs of its assessment areas, primarily through its home mortgage lending.

Fleet's lending activity is good in the State of Maine based on good performance in the Portland MSA. Fleet's deposits rank 2nd in the marketplace according to the 2000 FDIC Deposit Market Share Report data with a market share of 24%. Lending competition is vigorous for both mortgage loans and small business loans with 172 local and national HMDA reporters and 46 CRA reporters identified in this assessment area. The bank ranked 5th in home purchase lending with a market share of 4%, 1st in home improvement lending with a market share of 26% and 1st in refinance lending with a market share of 10%. For home loans a two nationwide mortgage companies and one bank were ranked ahead of Fleet. Fleet was ranked 6th for the number of small loans to businesses with market share of 5%. The bank was the 3rd ranked bank. Fleet's average loan sizes was \$108 thousand and responsive to the needs of small businesses. Fleet's dollar market share for small loans to businesses was 9%.

During the evaluation period, Fleet originated 7,853 HMDA loans totaling \$608 million in the assessment area. The number of home mortgage loans in the State of Maine represented 3.6% of the bank's overall home mortgage lending. Fleet has 1.27% of the total bank deposits within the State of Maine.

Fleet generated 57% of its Maine deposits in the Portland MSA, ranking second among other financial institutions. In the Portland MSA, Fleet's home purchase loans represented 29% of the number, home improvement loans 19% and refinance loans 52% of home mortgage loans originated or purchased in the State of Maine.

The number of loans to small businesses in the State of Maine represented 3% of the bank's overall volume of loans to small businesses. Fleet originated or purchased 1,454 small loans to businesses totaling \$134.4 million within the assessment area. The Portland MSA represented 35% of the number of small loans to businesses in the State of Maine.

In addition to home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for this product. In the Portland MSA, Fleet originated or purchased 13,790 consumer loans totaling \$111 million. The number of consumer loans in the state represented 2% of the bank's overall volume of consumer loans. Market share information is not available for consumer loans. Loan types in this category consist of motor vehicle, home equity, and other secured and unsecured.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is good based on the full-scope review of the Portland MSA. The number of owner-occupied units in the low-income geographies was only 476 units. Therefore, conclusions are mainly based upon Fleet's performance in moderate-income geographies.

Home Purchase Loans

The geographic distribution of home purchase loans is good in the Portland MSA. Fleet's distribution of lending in the low-income areas of Portland nearly doubled the percentage of owner-occupied housing units in those geographies. However, the market share in the low-income geographies is well below the overall market share. The distribution of lending in the moderate-income areas

of the Portland MSA nearly equaled the owner-occupied demographics of the areas. Similarly, the market share in the moderate-income geographies nearly equaled the overall market share.

Home Improvement Loans

The geographic distribution of home improvement loans is adequate in the Portland MSA. The distribution of lending in low-income areas equaled the percentage of owner-occupied housing units in those geographies. The market share in low-income geographies was below the overall market share. The distribution of lending in moderate-income areas was below the percentage of owner-occupied housing units. The market share in moderate-income geographies was below the overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is good in the Portland MSA. The distribution of lending in the low-income areas slightly exceeded the percentage of owner-occupied units in those geographies. The market share in those areas also exceeded the overall market share. The distribution of lending in the moderate-income areas was slightly below the percentage of owner-occupied units in those geographies. The market share in the moderate-income areas was slightly below the overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Maine section of Appendix D 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 businesses in the Portland MSA was excellent. The percentage of loans in low- and moderate-income geographies exceeded the percentage of businesses in those geographies. The market share for low- and moderate-income geographies also exceeded the overall market share.

Consumer Loans

Refer to Table 13 in the State of Maine section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in the low- and moderate-income geographies is adequate. The percentage of consumer loans originated is below the percentage of households in those tracts.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous gaps. Lending of all HMDA, small business, and consumer products is assessment-area wide.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall distribution of loans by borrower income level is good in the Portland MSA.

Home Purchase Loans

The borrower distribution of home purchase lending is good. Lending to low-income borrowers is well below the percentage of low-income families, but the distribution of lending to moderate-income borrowers nearly equaled the percentage of those families. The market share for low-income borrowers was slightly below the overall market share. The market share for moderate-income borrowers nearly equaled the overall market share.

When considering the high cost of housing with a median value of \$118 thousand in the Portland MSA and the maximum level of income to be considered low-income at \$24 thousand, it is difficult for low-income families to have sufficient income to purchase a home in the assessment area.

Home Improvement Loans

The borrower distribution of home improvement loans is good. Lending to low-income borrowers is well below the percentage of low-income families, but the distribution of lending to moderate-income borrowers exceeded the percentage of those families. Market share for low-income borrowers was slightly below the overall market share. Market share for moderate-income borrowers exceeded the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is adequate. Lending to low-income borrowers is significantly below the percentage of low-income families, and the distribution of lending to moderate-income borrowers is also slightly below the percentage of those families. The market share for low- and moderate-income borrowers was lower than the overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses reflects adequate responsiveness to the credit needs of smaller businesses in the Portland MSA. The bank's percentage of lending is below the small business demographics in the assessment area. However, the market share for loans to businesses with annual revenues of \$1 million or less nearly equaled its overall market share for small business loans. A majority of small loans were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the State of Maine section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Fleet's borrower distribution of consumer loans reflects good dispersion in the Portland MSA. The borrower distribution of consumer loans to low-income borrowers is adequate. The percentage of consumer loans originated is below the percentage of low-income households. However, the borrower distribution of consumer loans to moderate-income borrowers is excellent with the percentage of bank loans exceeding the percentage of moderate-income households.

Community Development Lending

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

The bank's CD lending efforts had a positive impact on the overall Lending Test. During the evaluation period, the bank made eight CD loans totaling \$21.4 million. The dollar volume represents 24% of the bank's Tier 1 Capital that is attributed to the Portland MSA. Fleet has been highly responsive to the needs of the community.

Examples include the following:

- Two of the CD loans, totaling \$2.8 million, were originated to a local housing partnership for the purpose of constructing a much-needed affordable housing project with 33 units, of which 7 will be at market rate. The project will receive a LIHTC allocation and is located in a low- or moderate-income area.
- Fleet provided financing to a local medical center that included \$6 million of construction funding in support of a new family practice center in a low- or moderate-income

community within the Portland MSA. The center was created specifically to support that community.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the following loans have been originated: Fleet Affordable Advantage (1/\$35,733), BBDC Loans (1/\$500) and Second Chance Loans (47/\$129,546). In addition, Fleet originated FHA loans (78/\$8.2 million) and State Housing Finance Authority loans (77/\$6.9 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed a product that is either specific to this rated area or offered to a limited geographic area. This included the following:

- **Maine Ice Loan Program:** Fleet originated 65 consumer loans totaling \$628 thousand under the Maine Ice Loan program to address the immediate needs of the community. Fleet offered special rates on unsecured installment loans at 7% with a maximum term of 48 months and Fast Equity loans at 7% for 5-15 years to help those impacted by the severe winter storms.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bangor and Lewiston MSAs and the Maine non-MSAs is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test in Maine. Refer to Tables 1-11 and 13 in the State of Maine section of Appendix D 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 in Maine is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Portland MSA is excellent.

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

Fleet originated 24 qualified investments during the evaluation period totaling \$420 thousand in the Portland MSA. An additional \$6.2 million in statewide investments was allocated to this MSA based on the percentage of the bank's deposits within this assessment area. The bank's investments have had a positive impact on the community. The dollar volume of the investments represented 7.45% of the bank's allocated Tier 1 Capital. Although the opportunities have been somewhat limited, Fleet has been aggressive in initiating the development of two banking consortia aimed at amalgamating resources for affordable housing and small business assistance.

The bulk of the statewide investment dollars were invested in LIHTCs, equity and technical assistance funds. The technical assistance funds are a part of the bank's \$14.6 billion Community Investment Commitment. The program is a five-year research and development effort by the bank to identify effective and sustainable methods of increasing the success of the bank's lending and investments efforts in support of low- and moderate-income borrowers, small businesses, and community development. Location specific investments in the Portland MSA totaled \$420 thousand. Although the volume is high, the investments were not especially innovative or complex.

The following are examples of Fleet's investments in the Portland MSA:

- Fleet provided a \$30 thousand grant to assist welfare and low-income women in acquiring technical skills and employment.
- Fleet also made a \$10 thousand grant to support a local planning council. The council's programs include educational opportunities, vocational training, community service opportunities, and literacy and math skills. The programs are targeted to low-income, at-risk youths.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Bangor MSA, Lewiston MSA, and non-metropolitan areas is not inconsistent with the bank's overall "Outstanding" performance under the investment test in Maine.

Refer to Table 14 in the State of Maine section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Maine is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Portland MSA is good.

Retail Banking Services

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

Fleet's distribution of branches in the Portland MSA is accessible to geographies and individuals of different income levels in its assessment area. Fleet operates 14 branches in the Portland MSA, with 3 branches or 21.4% in the moderate-income tracts. There are no branches located in the low-income tracts within the assessment area. The branch distribution in the low-income tracts is poor but the distribution in the moderate-income tracts is excellent compared to the 9.8% of the population that live in moderate-income geographies. There are 2 branches in the moderate-income tracts that border the low-income geographies. These are located at One City Center and 511 Congress Street. There are also ATMs located in the low-income tracts.

During the evaluation period, there was one branch closing.

Fleet's hours and services offered in the Portland MSA do not vary in a way that inconveniences any portion of the assessment area. There are no material differences in services provided throughout the branch network. Branch office hours and days of operation vary based on the convenience and needs of each branch's area. There are two branches in moderate-income geographies that do not offer Saturday hours. However, one is a drive-up facility that has low transaction volume. The other branch is located in a non-residential business district that has minimal weekend foot traffic.

All branches except for the drive-up branch have on-site ATMs. All branches offer multilingual ATM services, specifically French. The West Gate branch offers multilingual services including Spanish, Chinese, and Korean. In addition, Braille and 24-hour service are offered at these ATMs.

Community Development Services

Fleet's performance in providing community development services is good. During the evaluation period, several bank employees and various branches in the Portland MSA have provided technical assistance to numerous groups. Fleet co-sponsored technical assistance with the local community organizations throughout the evaluation period. Seminars offered included First-Time Homebuyers/Affordable Housing, Small Business, Basic Banking, and Managing Money. These seminars were targeted to low- or moderate-income individuals or small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Bangor MSA, Lewiston MSA, and non-metropolitan areas of Maine was stronger than the bank's overall

" High Satisfactory" performance under the service test in Maine. Seminars offered in these limited-scope areas were similar to the ones offered in Portland though less in number. This overall stronger performance was not considered significant enough to improve the overall state rating due to deposit market share and the extent of stronger performance.

Refer to Table 15 in the State of Maine section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for the State of Massachusetts ⁸ : <u>Satisfactory</u>	
The lending test is rated: <u>Satisfactory</u>	<u>High</u>
The investment test is rated: <u>Outstanding</u>	
The service test is rated: <u>Satisfactory</u>	<u>High</u>

The major factors that support this rating include:

- A good distribution of home mortgage lending, small business lending, and consumer lending throughout the assessment area;
- Good borrower distribution of mortgage and small business lending and excellent borrower distribution of consumer lending;
- The positive impact of community development lending and product flexibility;
- An excellent level of qualified community development investments;
- A good service delivery system that is accessible to geographies and individuals of different income levels in the assessment area; and,
- A good record of providing community development services.

Description of Institution's Operations in Massachusetts

Fleet has eight assessment areas within the State of Massachusetts. They include the Springfield MSA, Worcester MSA, Barnstable MSA (which also includes non-metropolitan areas of the Cape and Islands), Brockton MSA, Fitchburg MSA, Lowell MSA, New Bedford MSA, and the non-metropolitan areas of Western Massachusetts. As of June 30, 2000, Fleet ranked first among their peers in the State of Massachusetts with respect to deposit market share. Fleet's market share represented 33% compared to

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

the nearest competitor's at 9%. Fleet has 124 branches within the state.

Refer to the Market Profiles for the State of Massachusetts in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Massachusetts

We selected the Springfield and Worcester assessment areas for full-scope reviews while the Barnstable, Brockton, Fitchburg, Lowell, New Bedford assessment areas, and the non-metropolitan statistical areas received limited-scope reviews. The Springfield MSA and Worcester MSA contain 22% and 32% of Fleet's \$6.3 billion in deposits within the State, respectively. Refer to Scope of the Evaluation table in Appendix A for more information on the names of the counties included in each assessment area. The overall performance of the bank in Massachusetts was weighted by the percent of deposits generated in each assessment area. The full-scope MSAs account for 54% of the deposits in the state and 55% of the total loans.

During this examination, we considered information from community organizations in each of the full-scope areas. Information obtained from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Massachusetts is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the both the Springfield and Worcester MSAs is good.

Lending Activity

Refer to Table 1 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending record in Massachusetts represents a good responsiveness to the credit needs of its assessment areas, primarily through its home mortgage lending.

During the evaluation period, Fleet originated 19,513 mortgage loans totaling \$1,442 million in the assessment area. The number of home mortgage loans in the State of Massachusetts represented 9% of the bank's overall home mortgage lending. Fleet generated 7% of the total bank deposits within the State of Massachusetts.

Fleet generated 54% of its Massachusetts deposits in the Springfield and Worcester MSAs, ranking first in both MSAs among other financial institutions. Fleet had a 19% deposit market share in the Springfield MSA and 42% deposit market share in the Worcester.

In the Springfield MSA, Fleet's home purchase loans represented 25% of the number of home mortgage loans originated or purchased during the evaluation period. Home improvement loans represented 16% and refinance loans represented 59%. Fleet's market shares for home mortgage products in the Springfield MSA were 2%, 19% and 9% respectively.

In the Worcester MSA, home purchase loans represented 28% of the number of home mortgage loans originated or purchased during the evaluation period. Home improvement loans and refinance loans represented 15% and 57%, respectively. Fleet's market shares for home mortgage products in the Worcester MSA were 5%, 21% and 9% respectively.

Twenty-five multifamily loans were originated in the State of Massachusetts during the evaluation period. The volume represented less than 1% of the home mortgage lending in the state. This lending had a positive impact on lending but was insufficient for evaluating distribution.

The number of loans to small businesses in the State of Massachusetts represented 10.5% of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated 5,175 small loans to businesses totaling \$407 million within the assessment area. The Springfield MSA represents 24% of the number and 20% of the dollar volume. The Worcester MSA represents 25% of the number and dollar volume. The market shares for the Springfield and Worcester MSAs were each 3%.

In addition, to the home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for this product. The number of consumer loans in the state represent 12% of the bank's overall volume of consumer loans. During the evaluation period, Fleet originated 75,027 consumer loans totaling \$589 million within the assessment area. The Springfield MSA represents 27% of the number and 21% of the dollar volume originated within the State of Massachusetts. The Worcester MSA represents 28% of the number and 27% of the dollar volume originated. Loan types included in this category consist of motor vehicle, home equity, and other secured and unsecured. Market share information is not available for consumer loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is good in the Springfield MSA and the Worcester MSA.

Home Purchase Loans

Overall, the geographic distribution of home purchase loans is excellent. The bank exhibited an excellent distribution in the Springfield MSA and in the Worcester MSA.

The distribution of lending in the low-income areas of the Springfield MSA exceeded the percentage of owner-occupied units in those geographies. However, the market share within the low-income geographies was significantly less than the overall market share. The distribution of lending in the moderate-income areas of the Springfield MSA exceeded the percentage of owner-occupied units in those tracts and the market share was slightly below the overall market share.

The distribution of lending in the low- and moderate-income areas of the Worcester MSA exceeded the percentage of owner-occupied units in those tracts. The market share for those areas also exceeded the overall market share.

Home Improvement Loans

Overall, the geographic distribution of home improvement loans is good. The bank exhibited an excellent distribution in the Springfield MSA, and an adequate distribution in the Worcester MSA.

The distribution of lending in the low- and moderate-income areas of Springfield MSA exceeded the percentage of owner-occupied units in those areas. The market share within the low-income geographies exceeded the overall market share. The market share within the moderate-income geographies nearly equaled the overall market share.

The distribution of lending in the low-income geographies of the Worcester MSA nearly equaled the percentage of owner-occupied units in those tracts. The distribution of lending in the moderate-income geographies was well below the percentage of owner-occupied units in those areas. Both the market shares within low- and moderate-income geographies were significantly below the overall market share.

Home Mortgage Refinance Loans

Overall, the geographic distribution of home mortgage refinance loans is adequate. The bank exhibited an adequate distribution in the Springfield MSA and a good distribution in the Worcester MSA.

The distribution of lending in the low-income areas of the Springfield MSA is below the percentage of owner-occupied units in those areas. Similarly, the market share within the low-income geographies was well below the overall market share. The distribution of lending in the moderate-income areas of Springfield MSA was below the percentage of owner-occupied units in those areas. The market share within the moderate-income geographies nearly equaled the overall market share.

The distribution of lending in the low-income geographies of the Worcester MSA nearly equaled the percentage of owner-occupied units in those tracts. The distribution of lending in the moderate-income geographies was below the percentage of owner-occupied units in those areas. The market share within low-income geographies was less than the overall market share. The market share within the moderate-income geographies slightly exceeded the overall market share.

Small Loans to Businesses

Refer to Table 6 in the State of Massachusetts section of Appendix D 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 businesses reflects a good dispersion throughout its assessment areas. The bank exhibited an excellent distribution in the Springfield MSA and a good distribution in the Worcester MSA.

The distribution of lending in the low- and moderate-income areas of the Springfield MSA significantly exceeded the business demographics of the areas. In addition, the market shares for the low- and moderate-income areas significantly exceeded the overall market share.

The distribution of lending in the low-income areas of the Worcester MSA significantly exceeded the percentage of businesses in those geographies. The distribution of lending in the moderate-income areas was below the percentage of businesses in those geographies. The market share within the low- and moderate-income geographies was slightly below the overall market share.

Consumer Loans

Refer to Table 13 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Fleet's geographic distribution of consumer loans reflects adequate dispersion in the Springfield and Worcester MSAs. The distribution of lending within the low-income geographies of the Springfield MSA exceeded the percentage of households residing there. The distribution in moderate-income geographies of the Springfield MSA and in the low- and moderate-income geographies of the Worcester MSA nearly equaled the percentage of households in those geographies.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous gaps. There was one moderate-income tract within the full scope areas that did not have any HMDA lending. In this tract, the opportunities are limited with respect to HMDA lending given the small number of owner-occupied and rental units.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall borrower distribution of Fleet's home mortgage lending is good. The borrower distribution was excellent in the Springfield MSA and good in the Worcester MSA.

The median cost of housing in the Springfield MSA is \$122.5 thousand and in Worcester MSA is \$136.7 thousand. This is unaffordable to low-income families who have a maximum income of \$24 thousand for the Springfield MSA and \$27 thousand for the Worcester MSA. In addition, 12% and 9% of the households in the Springfield MSA and Worcester MSA, respectively, are below the poverty level.

Home Purchase Loans

The borrower distribution of home purchase loans is excellent. The bank exhibited an excellent distribution in both the Springfield MSA and the Worcester MSA.

The distribution of lending to low-income borrowers in the Springfield MSA was well below the percentage of low-income

families, but the distribution of lending to moderate-income borrowers exceeded the family income demographics by almost three times. The market shares for low- and moderate-income borrowers significantly exceeded the overall market share.

The distribution of lending to low-income borrowers in the Worcester MSA was significantly below the percentage of low-income families, but the distribution of lending to moderate-income borrowers significantly exceeded the family income demographics. The market shares for low- and moderate-income borrowers significantly exceeded the overall market share.

Home Improvement Loans

The borrower distribution of home improvement loans is good. The bank exhibited an excellent distribution in the Springfield MSA and a good distribution in the Worcester MSA.

The distribution of lending to low-income borrowers in the Springfield MSA was well below the percentage of low-income families, but the distribution of lending to moderate-income borrowers exceeded the family income demographics of those areas. The market shares for low- and moderate-income borrowers significantly exceeded the overall market share.

The distribution of lending to low-income borrowers in the Worcester MSA was significantly below the percentage of low-income families, but the distribution of lending to moderate-income borrowers nearly equaled the family income demographics of those areas. The market share for low-income borrowers was below the overall market share. The market share for moderate-income was slightly higher than the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is good. The bank exhibited a good distribution in the Springfield and Worcester MSAs.

The distribution of lending to low-income borrowers in the Springfield MSA was well below the percentage of low-income families. The distribution of lending to moderate-income borrowers was nearly equal to family income demographics. The market shares for low- and moderate-income borrowers exceeded the overall market share.

The distribution of lending to low-income borrowers in the Worcester MSA was significantly below the percentage of low-income families. The distribution of lending to moderate-income borrowers was below the family income demographics. The market share for low-income borrowers was slightly below the overall market share. The market share for moderate-income exceeded the overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses reflects a good responsiveness to the credit needs of smaller businesses in the Springfield and Worcester MSAs. The bank's percentage of lending is well below the small business demographics in both assessment areas. However, the market shares for loans to businesses with annual revenues of \$1 million or less exceeded the overall market share for small business loans. A majority of small loans were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans in low- and moderate-income geographies is excellent. The distribution of lending within the low- and moderate-income geographies for the Springfield and Worcester MSAs exceeded the percentage of households in those geographies.

Community Development Lending

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

CD lending had a positive impact in the Springfield MSA and a neutral impact in the Worcester MSA with respect to the Lending Test. During the evaluation period, Fleet made 14 CD loans totaling \$8.9 million in the Springfield MSA and 11 CD loans totaling \$4.2 million in the Worcester MSA. The dollar volume represents 5% and 2% of the bank's Tier 1 Capital that is attributed to the Springfield MSA and Worcester MSA, respectively. An example of a CD loan that has impacted the assessment area is listed below:

- In the Springfield MSA, Fleet originated three CD loans to a child care center. The purpose of the loans totaling \$3.2 million was to finance the purchase and construction of a facility that will enable the nonprofit organization to consolidate all of its programs in one location for convenience of the community. The organization provides integrated day care and education services for low- and moderate-income families in the Greater Springfield area. In this new facility, there will be space for 600 children. The

goal is to enable families by assisting in childcare and providing education to enhance their skills for better work opportunities. Upon completion, Fleet provided permanent financing, which was not a typical commercial real estate mortgage. Instead, the loan allowed this organization to purchase the Industrial Revenue Bond that was issued to take out Fleet's original construction loan.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within the Springfield MSA rating area, the following loans have been originated: Fleet Affordable Advantage (16/\$1.2 million), LMI Equity Loans (3/\$34,000), BBDC Loans (197/\$1.1 million) and Second Chance Loans (419/\$988,493).

In addition, Fleet originated FHA loans (82/\$7.6 million) and State Housing Finance Authority loans (35/\$2.8 million). In the Worcester MSA rating area, the following loans have been originated: Fleet Affordable Advantage (7/\$690,725), LMI Equity Loans (6/\$118,000), Fleet Co-Loans (2/\$365,000), BBDC Loans (244/\$814,500) and Second Chance Loans (186/\$503,382). In addition, Fleet originated FHA loans (75/\$8.2 million) and State Housing Finance Authority loans (57/\$5.5 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

- *Massachusetts Soft Second Program:* In the Springfield and Worcester MSAs, Fleet has made 332 loans totaling over \$14.5 million as part of the Massachusetts Soft Second Program. This below-market interest rate program is offered in 27 communities in Massachusetts. The program features a 75% first and a 20% second mortgage. The second mortgage payment is interest only for 10 years and the interest payment may be subsidized. The program also features no points and no mortgage insurance. Fleet has committed \$300 million to the program over five years.
- *Massachusetts Housing Finance Agency Home Improvement Loan Program:* Another flexible program that Fleet participates in is the Massachusetts Housing Finance Agency Home Improvement Loans. This program also meets one of the identified credit needs in the full-scope areas. In the Springfield MSA, Fleet originated 61 loans totaling \$3.5 million. In the Worcester MSA, Fleet originated 59 loans totaling \$5.6 million. The home improvement programs include lead removal and septic repairs. The programs provide below-market interest rate

funds with zero percent interest for owner-occupied units and 3% for non-owner occupied.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Barnstable MSA, Brockton MSA, Fitchburg MSA, Lowell MSA, New Bedford MSA, and the non-metropolitan areas of Western Massachusetts is weaker due to minimal volume of CD loans and weaker performance in both borrower and geographic distribution. However, this did not impact the bank's overall "High Satisfactory" performance under the lending test in Massachusetts. Refer to Tables 1-11 and 13 in the State of Massachusetts section of Appendix D 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 in Massachusetts is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Springfield and Worcester MSAs is excellent.

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

The volume of investments in both the Springfield and Worcester MSAs are highly responsive to the needs of the community. The bank's investments have had a positive impact on the community. While the dollar volume of investments was excellent, the investments were not especially innovative or complex.

In the Springfield MSA, Fleet provided 53 qualified investments during the evaluation period totaling \$133.8 million, which include a portion of statewide investments, based on the percentage of the bank's deposits in the MSA. Location specific investments in the Springfield MSA totaled \$131.5 million. The dollar volume of the investments represented 72% of the bank's allocated Tier 1 Capital. In addition, 4 qualified investments totaling \$6.6 million or 3.5% of allocated Tier 1 Capital were made in prior evaluation periods that remain on the bank's books as of the examination date.

In the Worcester MSA, Fleet provided 60 qualified investments during the evaluation period totaling \$21.4 million, which include a portion of statewide investments, based on the percentage of the bank's deposits in the MSA. Location specific investments in the Worcester MSA totaled \$18.1 million. The dollar volume of the investments represented 8% of the bank's allocated Tier 1 Capital. In addition, Fleet originated one

qualified investment totaling \$687 thousand or 0.3% of allocated Tier 1 Capital prior to the evaluation period that remain on the bank's books as of the examination date

Listed below are examples Fleet's investments:

- In the Springfield MSA, Fleet provided seven separate grants to a housing partnership that provides affordable housing services to the community. Five grants totaled \$99 thousand and supported the organization's FIRST HOME Program. The remaining two grants for \$40 thousand each were approved through Fleet's Technical Assistance Fund and were used to provide pre-development services.
- In the Worcester MSA, Fleet provided ongoing and increasing support to a local CDC. Between January 1998 and December 1999, Fleet gave the CDC two grants, which supported the CDC's efforts to revitalize the blighted Union and Oak Hill neighborhoods in Worcester. In 2000, Fleet provided an \$18,000 grant to support the CDC's Small Business Development Program and "Worcester Works" job fair. In 2001, Fleet provided an additional \$18,000 grant to support the agency's affordable housing and workforce development initiatives.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Lowell MSA and the non-metropolitan areas of Massachusetts are not inconsistent with the bank's overall "Outstanding" performance under the investment test in Massachusetts. The performance in the New Bedford, Fitchburg, Barnstable, and Brockton MSAs is weaker than the bank's overall performance in the state. The bank's weaker performance in these assessment areas does not have a material impact on the state rating.

Refer to Table 14 in the State of Massachusetts section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Massachusetts is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Springfield MSA and Worcester MSA is good.

Retail Banking Services

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

Fleet's distribution of branches in the Springfield MSA is accessible to low- and moderate-income geographies and individuals of different income levels in its assessment area. Fleet operates 43 branches in the Springfield MSA, with 4 branches or 9.3% in the low-income tracts, and 5 branches in the moderate-income tracts or 11.6%. The distribution is good compared to the 9.7% of the population that live in low-income geographies, and 10.6% that live in moderate-income geographies.

Among the 43 branches in the Springfield MSA, 5 are FCB branches. All but one of the FCB branches is located in a low- or moderate-income census tract. These branches enhance the delivery of services to low- and moderate-income customers and small businesses.

Fleet's distribution of branches in the Worcester MSA is good with 25 branches. Four branches or 16% are located in the low-income geographies, and one or 4% in the moderate-income tracts.

This branch distribution is excellent as compared to the population in the low-income tracts at 4.5%, but poor compared to the population in the moderate-income tracts at 15%. Among the 25 branches in the Worcester MSA, 3 are FCB branches and located in low- or moderate-income census tracts.

There was a net reduction of 12 branches in the Springfield MSA and a net increase of one branch in the Worcester MSA. The majority of the reductions was located in middle-income tracts and did not adversely impact the accessibility of retail delivery systems to individuals residing in low- or moderate-income geographies.

Fleet's hours and services offered in the Springfield MSA and Worcester MSA do not vary in a way that inconveniences any portion of the assessment area. There are no material differences in services provided throughout the branch network. Branch office hours and days of operation vary based on the convenience and needs of each branch's area. In the Springfield and Worcester MSAs, there are several branches located in low- or moderate-income areas that do not offer Saturday hours. However, these are located in non-residential business districts that have minimal weekend foot traffic. In addition, there are several other branches within a nearby distance that is opened on Saturdays. Supermarket branches typically open earlier and close later than traditional branches. Supermarket branches are also open on Saturdays and on Sundays.

All branches except for one in the Springfield MSA, and one in the Worcester MSA have on-site ATMs. A majority of the Springfield ATMs and nearly all of the Worcester ATMs offer

multilingual services. In addition, Braille and 24-hour service are offered at these ATMs.

Community Development Services

Fleet's performance in providing community development services is good in the Springfield and Worcester MSAs. During the evaluation period, several bank employees and various branches have provided technical assistance to numerous groups. Fleet co-sponsored technical assistance with the local community organizations throughout the evaluation period. Topics for seminars included First-Time Homebuyers/Affordable Housing, Small Business, Basic Banking, Managing Money, School Savings, and Women and Minorities in Business. These seminars were targeted to low- or moderate-income individuals or small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Barnstable, Brockton, Fitchburg, Lowell and New Bedford MSAs, and the non-metropolitan areas of Western Massachusetts is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in Massachusetts. Refer to Table 15 in the State of Massachusetts section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for the State of New Hampshire ⁹ : <u>Satisfactory</u>	
The lending test is rated: <u>Satisfactory</u>	<u>High</u>
The investment test is rated: <u>Satisfactory</u>	<u>High</u>
The service test is rated: <u>Satisfactory</u>	<u>High</u>

The major factors that support this rating include:

- An excellent distribution of home mortgage and small business loans throughout the geographies in the assessment area;
- Good distribution of lending to borrowers of different income levels and businesses of different sizes;
- A good level of qualified community development investments;
- A good service delivery system that is accessible to geographies and individuals of different income levels in the assessment area; and,
- A good record of providing community development services.

Description of Institution's Operations in New Hampshire

Fleet has four assessment areas within the State of New Hampshire. They include the Nashua MSA, Manchester MSA, and two non-metropolitan areas of New Hampshire. As of June 30, 2000, Fleet ranked fourth among their peers in the State of New Hampshire, but first in the Nashua MSA with respect to deposit market share. In the State of New Hampshire, Fleet's deposit market share was 7.9% compared to the number one ranked competitor at 42.4%. Fleet has 26 branches within the State of New Hampshire.

Refer to the Market Profiles for the State of New Hampshire in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in New Hampshire

The Nashua metropolitan area received a full-scope review while Manchester and the non-metropolitan areas received limited-scope reviews. The Nashua MSA contain 42% of Fleet's \$1.4 billion in deposits within the state. Total deposits within the State of New Hampshire represent 1.5% of total Fleet deposits. All other assessment areas received limited-scope reviews. Refer to the Scope of the Evaluation table in Appendix A for more information on the names of the counties included in each assessment area.

The overall performance of the bank in New Hampshire was weighted by the percent of deposits generated in each assessment area. The full-scope MSA account for 42% of the deposits and 42% of the total loans.

During this examination, we considered information from community organizations in each of the full-scope areas. Information obtained from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the State of New Hampshire is rated " High Satisfactory" . Based on full-scope review, the bank's performance in the Nashua MSA is good.

Lending Activity

Refer to Table 1 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending record in New Hampshire represents a good responsiveness to the credit needs of its assessment areas, based on good responsiveness in the Nashua MSA. Fleet's deposits rank 1st in the marketplace according the 2000 FDIC Deposit Market Share Report data with a market share of 38%. Lending competition is vigorous for both mortgage loans and small business loans with 226 local and national HMDA reporters and 45 CRA reporters identified in this assessment area. The bank ranked 13th in home purchase lending with a market share of 2%, 2nd in home improvement lending. Fleet was ranked 3rd for the number of small loans to businesses with market share of 12% behind two large nationwide companies providing credit card loans. Fleet's average loan size of \$87 thousand was responsive to the credit needs of small businesses. Fleet's dollar market share for small loans to businesses was 18%.

During the evaluation period, Fleet originated 4,480 loans totaling \$339.8 million in the assessment area. The number of home mortgage loans in the State of New Hampshire represented 2% of the bank's overall home mortgage lending. Fleet has 1.48% of the total bank deposits within the State of New Hampshire. Fleet generated 42% of its New Hampshire deposits in the Nashua MSA, ranking first among other financial institutions.

In the Nashua MSA, Fleet's home purchase loans represented 23% of the number of home mortgage loans originated or purchased in the State of New Hampshire. Fleet's home improvement loans represented 21% and home mortgage loans for refinance represented 56%. Additionally, two multifamily loans were originated in the State of New Hampshire during the evaluation period. However, the volume was immaterial and not analyzed.

The number of loans to small businesses in the State of New Hampshire represented 2.9% of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated or purchased 1,436 small loans to businesses totaling \$126.7 million within the assessment area. The Nashua MSA represents 46% of the number of small loans to businesses.

In addition to home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for this product. In the Nashua MSA, Fleet originated or purchased 14,105 consumer loans totaling \$113.5 million. The number of consumer loans in the State of New Hampshire represent 2.3% of the bank's overall volume of consumer loans. Market share information is not available for consumer loans. Loan types in this category consist of motor vehicle, home equity, and other secured and unsecured.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of lending is excellent based on the full-scope review of the Nashua MSA.

Home Purchase Loans

The geographic distribution of home purchase loans is excellent. The distribution of lending in the moderate-income geographies exceeded the percentage of owner-occupied housing in those geographies. The market share in the moderate-income tracts also exceeded the overall market share. There were no low-income geographies in the assessment area.

Home Improvement Loans

The geographic distribution of home improvement loans is excellent. The distribution of lending in the moderate-income geographies slightly exceeded the percentage of owner-occupied housing in those geographies. The market share in those geographies nearly equaled the overall market share for 1999.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is good. The distribution of lending in the moderate-income geographies was slightly below the percentage of owner-occupied housing in those geographies. The market share in those tracts was below the overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent. The percentage of loans in moderate-income geographies exceeded the percentage of businesses in those geographies. The market share for moderate-income geographies exceeded the overall market share.

Consumer Loans

Refer to Table 13 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans in the moderate-income geographies is adequate. The percentage of consumer loans originated is slightly below the percentage of households in those tracts.

Lending Gap Analysis

We reviewed the geographic distribution of loans and there were no gaps in any of the census tracts. Lending of all HMDA, small business, and consumer products is assessment-area wide.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

The overall distribution of loans by borrower income level is good in the Nashua MSA.

Home Purchase Loans

The borrower distribution of home purchase lending is excellent. Lending to low-income borrowers is significantly below the percentage of low-income families, but the distribution of lending to moderate-income borrowers significantly exceeded the percentage of those families. The market share both for low- and moderate-income borrowers exceeded the overall market share.

The high cost of housing with the median housing value of \$139.8 thousand in the Nashua MSA as compared to the maximum level of income to be considered low-income of \$32 thousand makes housing unaffordable for low-income families.

Home Improvement Loans

The borrower distribution of home improvement loans is good. Lending to low-income borrowers is significantly below the percentage of low-income families, but the distribution of lending to moderate-income borrowers equaled the percentage of those families. The market share for low- and moderate-income borrowers nearly equaled the overall market share.

Home Mortgage Refinance Loans

The borrower distribution of home mortgage refinance loans is good. The borrower distribution of home refinance loans to low-income borrowers is significantly below the percentage of low-income families. However, the market share of lending to low-income borrowers exceeded the overall market share. The borrower distribution of home refinance loans to moderate-income borrowers is below the percentage of moderate-income families. Similarly, the market share for those families is below the overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses reflects a adequate responsiveness to the credit needs of smaller businesses in the Nashua MSA. The bank's percentage of lending is less than the small business demographics in the assessment area. The market share for loans to businesses with annual revenues of \$1 million or less was also less than the overall market share for small business loans. A significant majority of the small loans to businesses were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 14 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans to low- and moderate-income borrowers is excellent. The percentage of consumer loans originated exceeded the percentage of low- and moderate-income households in those tracts.

Community Development Lending

Refer to Table 1 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank's CD lending during the evaluation period had a neutral impact on the overall Lending Test rating for the state. During the evaluation period, Fleet originated an adequate volume of CD loans. Fleet originated four CD loans totaling \$1.3 million. The dollar volume represents 1.7% of the bank's Tier 1 Capital that is attributed to the Nashua MSA. Two of the larger CD loans refinanced a mortgage for needed capital improvements to a 22-unit affordable housing facility for the elderly. All units are one-bedroom apartments occupied by low-income tenants. The project was originally developed in connection with the LIHTC and Section 8 Rehabilitation programs.

Product Innovation and Flexibility

While Fleet has made some flexible loans in the Nashua MSA, the complexity and volume had a neutral impact on the Lending Test.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within this rating area, the

following loans have been originated: Fleet Affordable Advantage (1/\$140,000), LMI Equity Loans (2/\$45,000), BBDC Loans (63/\$130,500) and Second Chance Loans (30/\$98,399). In addition, Fleet originated FHA loans (51/\$5.8 million) and State Housing Finance Authority loans (3/\$282,685).

There were no programs specific to this area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Manchester MSA and the non-metropolitan areas of New Hampshire was weaker than the bank's overall "High Satisfactory" performance under the lending test in New Hampshire. However, due to the smaller deposit bases in these areas and the lack of opportunity for CD lending, this had no effect on the overall rating. Refer to the Tables 1 through 11 and Table 13 in the State of New Hampshire section of Appendix D 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 in New Hampshire is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Nashua MSA is good.

Refer to Table 14 in the State of New Hampshire section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Fleet made 17 qualified investments originated during the evaluation period totaling \$113 thousand. In addition, \$3.2 million in statewide investments was allocated to this assessment area based on the percentage of bank deposit. The dollar volume of the investments represented 4% of the bank's allocated Tier 1 Capital. In addition, Fleet originated one qualified investment totaling \$769 thousand or 1% of allocated Tier 1 Capital prior to the evaluation period that remains on the bank's books as of the examination date. The investments are responsive to the identified needs of the community. There have been limited opportunities to participate in investments in this area. Fleet has been responsive to those opportunities that exist.

The statewide investments include LIHTCs for a local housing equity fund. The equity in these funds is invested in entities that develop and operate low- and moderate-income rental housing in New Hampshire. In addition, Fleet provided a \$22.5 thousand grant to a neighborhood housing service. This is a two-year partnership that will support the education, technical assistance, counseling, grants, and loans to assist low- and moderate-income individuals and families seeking to purchase a

home. Location specific investments in the Nashua MSA totaled \$112.7 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test, the non-metropolitan areas of New Hampshire is not inconsistent with the bank's overall "High Satisfactory" performance in the state. Performance in the Manchester MSA was stronger than the bank's overall "High Satisfactory" performance. Refer to Table 14 in the State of New Hampshire section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in New Hampshire is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Nashua MSA is good.

Retail Banking Services

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

Fleet's distribution of branches in the Nashua MSA is good. The branches are accessible to low- and moderate-income geographies and individuals of different income levels in its assessment area. Fleet operates 8 branches in the Nashua MSA, with one branch or 12.5% in a moderate-income geography. There are no low-income tracts in this MSA. The distribution is good compared to the 15.4% of the population that lives in moderate-income geographies.

Fleet's hours and services offered in the Nashua MSA do not vary in a way that inconveniences any portion of the assessment area. There are no material differences in services provided throughout the branch network. Branch office hours and days of operation vary based on the convenience and needs of each branch's area. There is one low- and moderate-income branch that does not offer Saturday hours. However, this branch is located in a non-residential business district with minimal weekend foot traffic. There are four Fleet branches in non-low- and moderate-income geographies that are within a short distance that are opened on Saturdays.

During the evaluation period, there were no branch openings or closings.

All branches have on-site ATMs. In total, there are 24 ATMs in the Nashua MSA in 16 different locations. Nearly all of the ATMs offer multilingual services including Spanish, Chinese, Korean, or French. Braille and 24-hour ATM service are offered at select branch locations. Three of the 24 ATMs are located in a moderate-income census tract and two of these offer multilingual services.

Community Development Services

Fleet's performance in providing community development services is good in the Nashua MSA. CD opportunities are available for financial institutions in the assessment area. During the evaluation period, several bank employees have provided technical assistance to numerous groups. Technical assistance was provided throughout the evaluation period and co-sponsored with the local community organizations. Seminars include First-Time Homebuyers, Small Business, Basic Banking, Managing Money, and School Savings. These seminars were targeted to low- or moderate-income individuals as well as students.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Manchester MSA and non-metropolitan areas of New Hampshire is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in New Hampshire. Refer to Table 15 in the State of New Hampshire section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for the State of New Jersey: Satisfactory

The lending test is rated:

High Satisfactory

The investment test is rated:

High Satisfactory

The service test is rated:

High Satisfactory

The major factors that support this rating include:

- A good volume of home mortgage lending, small business lending, and consumer lending throughout the assessment area;
- Good geographic distribution of home mortgage and consumer loans and an excellent distribution of small business loans;
- Good borrower distribution of home mortgage and small business loans and excellent distribution of consumer loans;
- Community development lending and product flexibility had a positive impact on the Lending Test;
- A good level of qualified community development investments; and,
- Service delivery systems are accessible to geographies and individuals of different income levels.

Description of Institution's Operations in the State of New Jersey

Fleet has eight assessment areas within the State of New Jersey.

The areas that we included in our review consist of seven New Jersey MSAs in their entirety and the New Jersey portion of the Philadelphia, Pennsylvania multistate MSA. They are Atlantic-Cape May, Bergen-Passaic, Jersey City, Middlesex-Somerset, Monmouth-Ocean, Newark, and Trenton MSA. The bank's assessment area includes the entire State of New Jersey except the Vineland-Millville MSA. As of our examination date, Fleet had 176 branches in the State of New Jersey.

Refer to the Market Profiles for the State of New Jersey in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New Jersey

We selected the Middlesex-Somerset and Newark Assessment Areas for full-scope reviews. These two areas contain 20% and 17%,

respectively, of Fleet's \$12.9 billion in deposits within the state. These assessment areas were selected due to the high percentage of deposits. In addition, the large percentage of low- and moderate-income census tracts within the Newark MSA contributed to its selection. Total deposits within the State of New Jersey represent 14% of total Fleet deposits. All other assessment areas received limited-scope reviews. Refer to the Scope of the Evaluation table in Appendix A for more information on the names of the counties included in each assessment area.

The overall performance of the bank in New Jersey was weighted by the percent of deposits generated in each assessment area. The two full-scope MSAs account for a total of 37% of the deposits in the state and 39% of the total loans.

During this examination, we considered information from community organizations that were subject to full-scope reviews. Information obtained from these contacts is included in the Market Profile section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New Jersey is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in both the Middlesex-Somerset and Newark MSAs is good.

Lending Activity

Refer to Table 1 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet's lending record in New Jersey represents a good responsiveness to the credit needs of its assessment areas, primarily through its home mortgage and community development lending. Fleet's lending activity is good in the State of New Jersey based on good performance in both the Middlesex-Somerset and Newark MSAs.

In the Middlesex-Somerset MSA, Fleet's deposits rank 5th in the marketplace according to the 2000 FDIC Deposit Market Share Report data with a market share of 5%. Lending competition is intense for both mortgage loans and small business loans with 407 local and national HMDA reporters and 113 CRA reporters identified in this assessment area. The bank ranked 5th in home purchase lending with a market share of 4%, 1st in home improvement lending with a market share of 12% and 3rd in refinance lending with a market share of 6%. Fleet was ranked 10th for the number of small loans to businesses with market share of 2%. Fleet's average loan size of \$112 thousand was responsive to the needs of

small businesses. Fleet's dollar market share for small loans to businesses was 5%.

In the Newark MSA, Fleet's deposits rank 9th in the marketplace according to the 2000 FDIC Deposit Market Share Report data with a market share of 3%. Lending competition is intense for both mortgage loans and small business loans with 451 local and national HMDA reporters and 140 CRA reporters identified in this assessment area. The bank ranked 4th in home purchase lending with a market share of 4%, 6th in home improvement lending with a market share of 6% and 4th in refinance lending with a market share of 4%. Fleet was ranked 15th for the number of small loans to businesses with market share of 1%. Fleet's dollar market share for small loans to businesses was 2%.

During the evaluation period, Fleet originated or purchased 41,877 home mortgage loans totaling \$4.6 billion in the state. The number of home mortgage loans represented 21% of the overall home mortgage lending. Fleet generated 14% of the total bank deposits within the State of New Jersey.

During the evaluation period, Fleet originated or purchased 7739 home mortgage loans totaling \$862 million in the Middlesex-Somerset MSA. Fleet's home purchase loans in this MSA represented 44% of home mortgage loans it originated in New Jersey. Fleet's home improvement loans represented 12% and home mortgage loans for refinance represented 43% of the home mortgage loans it originated in New Jersey.

During the evaluation period, Fleet originated or purchased 9100 home mortgage loans totaling \$1.1 billion in the Newark MSA. Fleet's home purchase loans in this MSA represented 46% of home mortgage loans it originated in New Jersey. Fleet's home improvement loans represented 12% and home mortgage loans for refinance represented 42% of the home mortgage loans it originated in New Jersey.

The number of loans to small businesses in the State of New Jersey represented 9% of the bank's overall volume of loans to small businesses. During the evaluation period, Fleet originated or purchased 4439 small loans to businesses totaling \$486 million. The Middlesex-Somerset MSA represents 19% of the total number and 20% of the dollar amount of this lending. The Newark MSA represents 19% of the total number of loans and 20% of the dollar amount of this lending.

In addition to home mortgage and small business loans, Fleet originated a large volume of consumer loans and requested that we evaluate the bank's performance for this product. In the Middlesex-Somerset and Newark MSAs, Fleet originated 9,815 and 11,213 consumer loans, respectively. Loan types included in this category consist of home equity, motor vehicle, other secured and other unsecured loans. There is no market share information data available for consumer lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is good in the Middlesex-Somerset and Newark MSAs.

Home Purchase Loans

Overall, Fleet's distribution of home purchase loans is excellent. The bank exhibited an excellent distribution in both the Middlesex-Somerset and Newark MSAs.

Fleet's distribution of lending in the low-income geographies in the Middlesex-Somerset MSAs exceeded the percentage of owner-occupied units of the geographies. The market share for low-income geographies significantly exceeded the overall market share. Fleet's distribution of lending in the moderate-income geographies of the Middlesex-Somerset MSA significantly exceeded the owner-occupied units of the geographies. In addition, the market share in moderate-income geographies exceeded the overall market share.

Fleet's distribution of lending in the low-income geographies in the Newark MSA significantly exceeded the percentage of owner-occupied units of the geographies. The market share for low-income geographies significantly exceeded the overall market share. Fleet's distribution of lending in the moderate-income geographies also significantly exceeded the percentage of owner-occupied units in the geographies. The market share in moderate-income geographies also exceeded the overall market share.

Home Improvement Loans

Overall, Fleet's distribution of home improvement loans is poor. The bank exhibited poor distribution in the Middlesex-Somerset and Newark MSAs.

In the Middlesex-Somerset MSA, Fleet's originated only two home improvement loans in low-income geographies. This produced a distribution far below the percentage of owner-occupied housing and a market share to low-income geographies that was significantly below the overall market share. The distribution of lending to moderate-income geographies was also significantly below the percentage of owner-occupied housing in those

geographies. The market share in moderate-income geographies was one-half the overall market share.

Fleet's distribution of lending in the low-income geographies Newark MSA was far below the percentage of owner-occupied units.

The market share for the low-income geographies was significantly below the overall market at only one-sixth of the overall market share. The distribution of lending in the moderate-income geographies was significantly below the owner-occupied units of the geographies. The market share in the moderate-income geographies was also far below their overall market share.

Home Mortgage Refinance Loans

Overall, Fleet's distribution of home mortgage refinance loans is adequate. The bank exhibited adequate distribution in the Middlesex-Somerset MSA and good distribution in the Newark MSA.

Fleet's distribution of lending in the low-income geographies in the Middlesex-Somerset MSA was less than the percentage of owner-occupied units in these geographies. The market share in the low-income geographies was less than the overall market share. The distribution of lending in the moderate-income geographies was significantly less than the percentage of owner-occupied units. However, the market share was less than the overall market share.

Fleet's distribution of lending in the low-income geographies in Newark MSA was near to the percentage of owner-occupied units in these geographies. The market share for low-income geographies was only slightly below their overall market share. The distribution of lending in the moderate-income geographies was less than the percentage of owner-occupied units, and the market share was also less than the overall market share.

Small Loans to Businesses

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

Fleet's geographic distribution of small loans to businesses reflects an excellent dispersion throughout its assessment area.

The bank exhibited an excellent dispersion in the both the Middlesex-Somerset and Newark MSAs.

Fleet's distribution of lending in the low-income and moderate-income geographies of the Middlesex-Somerset MSA exceeded the percentage of business located in these geographies. In addition, Fleet's market share in these geographies was significantly above its overall market share.

The bank's distribution in the Newark MSA slightly exceeded the business demographic in the low-income geographies. The market share in these low-income geographies was slightly above its overall market share. The distribution in moderate-income geographies was slightly below the percentage of businesses located in these geographies. However, the market share of lending slightly exceeded the overall market share.

Consumer Loans

Refer to Table 13 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Fleet's geographic distribution of consumer loans reflects an adequate dispersion in the Newark MSA and a good dispersion in the Middlesex-Somerset MSA.

Fleet's distribution of lending in the low-income geographies was slightly less than the percentage of households located in these geographies in the Middlesex-Somerset MSA. The percentage of lending in moderate-income geographies slightly exceeded the percentage of households.

Fleet's distribution of lending in the low-income geographies of the Newark MSA was significantly less than the percentage of low-income households. In the moderate-income geographies the percentage of lending was slightly less than the percentage of households.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any unexplained conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. The median prices for housing in both of the full-scope areas is high making purchases difficult for low- and moderate-income borrowers. It is especially difficult in the Newark MSA where the poverty level is 9%.

The overall borrower distribution of Fleet's home mortgage lending is good in the Middlesex-Somerset MSA and adequate in the Newark MSA.

Home Purchase Loans

Fleet's distribution of home purchase loans to borrowers of different income levels is good. The bank exhibited an excellent distribution in the Middlesex-Somerset MSA, and a good distribution in the Newark MSA.

Fleet's distribution of lending to low-income borrowers in the Middlesex-Somerset MSA significantly exceeded the percentage of families, and the low-income market share was well above the overall market share. The distribution of lending to moderate-income borrowers significantly exceeded the percentage of these families and the market share also exceeded the overall market share.

Fleet's distribution of lending to low-income families in the Newark MSA was below the family demographics of the areas, however the low-income market share was well above the overall market share. The distribution of lending to moderate-income borrowers in the Newark MSA significantly exceeded the percentage of families. The moderate-income market share also exceeded the overall market share.

Home Improvement Loans

Fleet's distribution of home improvement loans to borrowers of different income levels is good. The bank demonstrated a good distribution in the Middlesex-Somerset MSA and an adequate distribution in the Newark MSA.

Fleet's distribution of lending to low-income borrowers in the Middlesex-Somerset MSA was significantly below the percentage of low-income families. The market share was also well below the overall market share. However, the percentage of lending to moderate-income families exceeded the percentage of moderate-income families. The market share was less than the overall market share.

Fleet's distribution of lending to low-income borrowers in the Newark MSA was far below the percentage of low-income families. The market share was slightly below the overall market share. The distribution of lending to moderate-income borrowers was slightly below the percentage of families, and the moderate-income market share was also below the overall market share.

Home Mortgage Refinance Loans

Fleet's distribution of home mortgage refinance loans to borrowers of different income levels is adequate. The bank demonstrated a good distribution in the Middlesex-Somerset MSA and an adequate distribution in the Newark MSA.

Fleet's distribution of lending to low-income borrowers in the Middlesex-Somerset MSA was significantly below the percentage of low-income families. However, the market share was above the overall market share. The distribution of lending to moderate-

income borrowers was above percentage of moderate-income families. The market share to moderate-income borrowers nearly equaled to the overall market share.

Fleet's distribution of lending to low-income borrowers in the Newark MSA was far below the percentage of low-income families. The market share was similarly below the overall market share. However, the percentage of lending to moderate-income borrowers was only slightly below the percentage of moderate-income and the market share was nearly equal to the overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Fleet's distribution of small business loans reflects adequate responsiveness to the credit needs of smaller businesses in its full scope assessment areas. The distribution of the bank's lending to small businesses, defined as businesses with annual revenues of \$1 million or less, was less than percent of small businesses in each full scope assessment areas. However, the bank's market share of lending to businesses with annual revenues of \$1 million or less in each of the full scope assessment areas slightly exceeded their overall market share. In addition, approximately 80% of the bank's small business loans were for less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Fleet's borrower distribution of loans reflects excellent dispersion in each of the full scope areas.

Fleet's distribution of lending to low-income borrowers significantly exceeded the percentage of low-income and moderate-income households in the Middlesex-Somerset MSA. Fleet's distribution of lending was only slightly below the percentage of low-income households in the Newark MSA. The distribution of lending to moderate-income borrowers significantly exceeded the percentage of moderate-income households.

Community Development Lending

Refer to Table 1 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank's CD lending efforts during the evaluation period had a positive influence on the overall Lending Test rating for the state. During the evaluation period, Fleet originated an excellent volume of CD loans given the opportunities available in the full scope assessment areas.

During the evaluation period, Fleet originated 8 CD loans totaling \$45.2 million in the Middlesex-Somerset MSA and 11 CD loans totaling \$52.1 million in the Newark MSA. These dollar amounts represent 13% and 18% of the bank's allocated Tier 1 Capital, respectively. Although we noted some evidence of complexity associated with these loans, we did not identify many instances of innovative or leadership characteristics.

Examples include:

- Fleet provided a \$428 thousand loan to a nonprofit community development organization in the Middlesex-Somerset assessment area. The loan was a refinance of a purchase money mortgage provided by the original for-profit owner of three apartment buildings with 21 units of rental housing all for low-and moderate-income tenants.
- Fleet provided a \$2 million loan to finance the rehabilitation and completion of 123 condominium units to be sold to low- or moderate-income purchasers in the Middlesex-Somerset assessment area. The State of New Jersey is subsidizing 50% of the project with financing under the Urban Homeownership Recovery Program.
- Fleet provided a \$650 thousand loan to finance the construction of 18 for-sale homes targeted to low- and moderate-income households in a low- and moderate-income community in the Newark assessment area.
- Fleet provided a \$4.5 million construction loan to a nonprofit organization that serves the low- and moderate-income community in the Newark assessment area. The loan is to finance the construction of a charter school in a low-income community.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. In the Middlesex-Somerset MSA, the following loans have been originated: Fleet Affordable Advantage (64 / \$7 million), LMI Equity Loans (8/\$161 thousand), and Second Chance Loans (126/ \$495 thousand). In addition, Fleet originated FHA loans (122 / \$14.9 million) and State Housing

Finance Authority loans (7 / \$830 thousand). In the Newark MSA, the following loans have been originated: Fleet Affordable Advantage (40 / \$5.5 million), LMI Equity Loans (7/ \$134 thousand), and Second Chance Loans (116/ \$453 thousand). In addition, Fleet originated FHA loans (153/ \$20.3 million) and State Housing Finance Authority loans (54/ \$5.6 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to the State of New Jersey or offered to a limited geographic area. Those include:

- *Jumpstart* - A partnership between Fleet and the state mortgage financing agencies in four states (Rhode Island, New Hampshire, New York and New Jersey). Fleet provides an unsecured loan at the time the agency makes the first mortgage. The unsecured loan is at the first mortgage rate and is made for downpayment and closing costs. During the evaluation period, Fleet made 49 loans totaling \$162 thousand in New Jersey.
- *Hurricane Floyd Flood Loans* - In response to the damage residents of a number of counties in New Jersey experienced following Hurricane Floyd, Fleet offered special low rates and extended terms on personal unsecured installment and equity loans. Fleet originated 6 loans totaling \$40 thousand under this program.
- *New Jersey Home Improvement Unsecured Loans* - An unsecured loan with an extended term and an interest rate 1% below the rate of standard home improvement loans. These loans are available to low- and moderate-income tenants or homeowners. Fleet originated 39 loans totaling \$160 thousand under this program.
- *New Jersey Handicapped Rehabilitation Home Improvement and Equity Loans* - A secured or unsecured loan available to low- and moderate-income individuals and small business owners located in low- and moderate-income geographies. The loans are to support the modification of existing structures to either provide or improve access and tenancy for handicapped persons. The loans have an extended term and an interest rate 1% below the standard rate of home improvement loans. Fleet originated 8 loans totaling \$41 thousand under this program.
- *NJ Home Mortgage Opportunity Loan* - This program was offered from 1997 through 1999 and provided a 1% below market interest rate and flexible underwriting guidelines, including low downpayment and employment and credit flexibility. Fleet originated 529 loans totaling \$59 million in New Jersey.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Atlantic, Bergen-Passaic, Jersey City, Monmouth, Philadelphia, and Trenton assessment areas are not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test for New Jersey.

Refer to Tables 1 through 11 and Table 13 in the State of New Jersey section of Appendix D 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 in New Jersey is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Middlesex-Somerset MSA is good and the Newark MSA is excellent.

Refer to Table 14 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Fleet made 33 investments totaling \$6.8 million. An additional \$700 thousand of statewide investments was allocated to this assessment area based on the percentage of deposits. This volume of investments is good in relation to the level of CD opportunities that are presented in the MSA and represents 2% of the bank's allocated Tier 1 Capital. Fleet also has one investment that was made prior to this evaluation period that is still outstanding with a current net book value of \$4.9 million. Although the volume is good, we did not identify investments with that were especially innovative or complex, nor were leadership characteristics displayed.

The following are examples of Fleet's investments in the Middlesex-Somerset assessment area:

- Fleet invested \$6.6 million in a municipal security. This was a bond for the city of Perth-Amboy for the rehabilitation of a park and other urban renewal projects, including road resurfacing and shoreline improvements. Perth-Amboy is comprised of 11 census tracts, of which 1 (9%) is low-income and 10 (91%) are moderate-income. These improvements served to revitalize and stabilize the city.
- Fleet provided a \$50 thousand grant to pay predevelopment costs for a mixed income housing complex which will create a

total of 100 units of housing, of which 88 units will be affordable housing and 12 will be at market rates.

- Fleet provided a \$75 thousand three-year grant to a community-based health center that provides financial assistance and charity care to low- and moderate-income children, as well as comprehensive health education and support for the children and their families.

During the evaluation period, Fleet made 92 investments totaling \$17.5 million. An additional \$500 thousand of statewide investments was allocated to this assessment area based on the percentage of deposits. This volume of investments is excellent in relation to the level of CD opportunities that are presented in the MSA and represents 6% of the bank's allocated Tier 1 Capital. Although the volume is high, we did not identify investments with that were especially innovative or complex, nor were leadership characteristics displayed. Fleet also has eleven investments that were made prior to this evaluation period that are still outstanding with a current net book value of \$10.4 million.

The following are examples of Fleet's investments in the Newark assessment area:

- Fleet invested a total of \$16.7 million in three LIHTC projects in the assessment area. In total these investments created 305 units of affordable housing.
- Fleet provided a \$25 thousand grant to a community based organization's financial literacy program for low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jersey City, Trenton and Philadelphia assessment areas was stronger than the bank's overall "High Satisfactory" based on solely on the dollar volumes as compared to Tier 1 Capital. Performance under the investment test in the Bergen-Passaic, Monmouth-Ocean, and Atlantic-Cape May MSAs is weaker than the bank's overall performance in the state. The weaker performance is based on the comparatively low volume of investments within these assessment areas as compared with the level noted in the full-scope areas. These differences in performance did not, however, have a significant impact on the overall Investment Test rating for the state. Refer to Tables 14 in the State of New Jersey section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in New Jersey is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Newark MSA is adequate and in the Middlesex-Somerset MSA is excellent.

Retail Banking Services

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

Fleet's delivery systems are accessible to geographies and individuals of different income levels throughout the full scope assessment areas. Accessibility is excellent in the Middlesex-Somerset MSA and good in the Newark MSA. In the Middlesex-Somerset MSA, Fleet's distribution of offices located in low- or moderate-income geographies exceeded the distribution of the population living in such geographies. In the Newark MSA, the distribution of branches in the low-income geographies exceeded the population living in those geographies, but the distribution of branches in the moderate-income geographies was much lower than the percentage of the population living in those geographies.

On a net basis, branch closures and openings had no affect on the accessibility of retail delivery systems to low- and moderate-income individuals and geographies in the two full scope assessment areas. In the Middlesex-Somerset assessment area, a branch in a moderate-income geography was closed when the landlord would not renew the lease. The branch was relocated one block away within the same moderate-income geography. There were no openings or closing in the Newark MSA.

Fleet's hours of operation in the low- and moderate-income branches are similar to those in the middle- and upper-income branches. In both full scope assessment areas, Saturday hours from 9:00 AM to 12:00 noon are generally offered. One of the four branches that does not have Saturday hours in the Middlesex-Somerset assessment area is located in a low-income geography. This branch is not open on Saturday based on the limited transaction volume experienced at the branch throughout the week, at less than half the average monthly transaction volume of branches in the bank's franchise. In the Newark assessment area, one of two branches that do not have Saturday hours is located in a low-income geography. The branch is in an office building, which has no access to the general public on weekends and is therefore closed on Saturdays.

Fleet's standard loan and deposit products are offered at all locations. Fleet's ATM network offers a reasonable alternative delivery system for delivering teller based services to low- and moderate-income geographies and low- and moderate-income individuals. There are 4 ATMs in low-income geographies and 10

ATMs in moderate-income geographies. All ATMs are available in English, Spanish, Chinese and Korean.

Community Development Services

Fleet's performance in providing CD services is good, based on good performance in both the Middlesex-Somerset and Newark MSAs. Opportunities to become involved with organizations that have a community development focus are available in both of the full scope assessment areas.

In the full-scope areas, Fleet employees provided their technical and banking expertise as Board and committee members to organizations that focus on providing affordable housing for low- and moderate-income families, revitalizing and stabilizing distressed communities, and economic development. Fleet also conducted a total of 44 seminars in the Middlesex-Somerset MSA and 84 seminars in the Newark MSA that were responsive to identified community credit needs. Topics were basic banking, small business, affordable housing, first-time homebuyer, managing money, and school savings.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Atlantic-Cape May was not inconsistent with the bank's overall "High Satisfactory" performance under the service test in New Jersey. While Fleet had no branches in the low-income geographies of these assessment areas, the percentage of branches in moderate -income areas exceeded the percentage of population. In the Bergen, Jersey City, Monmouth-Ocean, and Philadelphia MSAs the performance was weaker than the bank's overall "High Satisfactory" performance under the service test. There were no branches in any of the low-income geographies of these assessment areas. In the Philadelphia assessment area, there were no branches in moderate-income geographies and in the Bergen, Jersey City and Monmouth-Ocean assessment areas the branches in moderate-income geographies was less than the percentage of the population within those geographies. In the Trenton MSA, the bank's performance is stronger than the bank's overall performance in the state. The distribution of Fleet's branches in low-and moderate-income geographies in this assessment area significantly exceeds the distribution of the population living in those geographies. Refer to Table 15 in the State of New Jersey section of Appendix D for the facts and data that support these conclusions.

State Rating

CRA Rating for State of New York : Outstanding

The lending test is rated:

Outstanding

The investment test is rated:

High Satisfactory

The service test is rated:

High Satisfactory

The major factors that support this rating include:

- Lending volumes reflect excellent responsiveness to assessment area credit needs;
- An excellent geographic distribution of home purchase loans and small loans to businesses;
- An excellent level of community development lending that addressed the credit needs of the assessment area;
- A good level of qualified investments; and,
- Delivery systems are generally accessible to geographies and individuals of different income levels.

Description of Institution's Operations in New York State

Refer to the Market Profiles for the State of New York in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Fleet has 13 assessment areas in the State of New York. These areas included the Albany-Schenectady, Buffalo, Dutchess County, Elmira, Jamestown, Nassau-Suffolk, New York City, Newburgh, Rochester, Syracuse and Utica MSAs and the 2 non-metropolitan assessment areas including the following counties: Allegany, Cattaraugus, Columbia, Cortland, Greene, Schuyler, Seneca, Steuben, Sullivan, Tompkins, Ulster, Wyoming and Yates.

As of June 30, 2000, Fleet ranked fifth among their peers within the state with respect to deposit market share. The bank had total deposits of \$15 billion and a market share of 3.38%. Fleet operates a total of 406 branches in the State of New York.

Scope of Evaluation in New York State

Refer to the table in Appendix A for more information on areas that received full-scope and limited-scope reviews. The ratings are based primarily on results of those areas that received full-scope reviews.

We selected four assessment areas for full scope review. These were the Albany-Schenectady MSA, the Nassau-Suffolk MSA, the New York City MSA, and the Syracuse MSA. The full-scope assessment areas represent 62% of the deposits and 74% of the lending in the state. The Nassau-Suffolk MSA and the New York MSA assessment areas received the most weight as they account for nearly 61% of total loans in New York State.

The assessment areas that received limited-scope reviews include the Buffalo MSA, the Dutchess County MSA, the Elmira MSA, the Jamestown MSA, the New York non-MSA areas, the Newburgh MSA, the Rochester MSA, and the Utica MSA.

During this examination, we considered information from community organizations, especially for the full-scope areas. Information from these contacts is included in the Market Profile Section of Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated "Outstanding". Based on full-scope reviews, the bank's performance in the New York and Nassau-Suffolk MSAs is excellent, and in the Albany-Schenectady and Syracuse MSAs is good.

Lending Activity

Refer to Table 1 in the State of New York section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Fleet has demonstrated excellent responsiveness to credit needs in its assessment areas. The results of its community development and mortgage lending contributed significantly to the overall assessment of this performance criterion. Fleet, relative to its market share of deposits, originated an excellent volume of community development loans and home mortgages, particularly in the New York City MSA.

During the evaluation period, Fleet originated or purchased 66,840 home mortgage loans totaling \$6.5 billion in the state. During 1998 and 1999, this volume placed Fleet first among lenders based on the number of loans as compared to its fifth rank in deposits. This number of mortgages represented 31% of the bank's overall mortgage lending. Fleet generates 16% of its deposits within the State of New York. Fleet's origination of mortgages represented excellent responsiveness to the identified

need for mortgages, including mortgages for home purchase.

In the New York City MSA, Fleet ranked sixth in 1998 and fourth in 1999 in mortgage lending, while ranked fourteenth in deposit market share with a market share of 1.33%. Home purchase lending represented 40% of mortgage lending; home improvement represented 16% and refinance loans 44% for this MSA. The market shares for these products in 1999 were 2.5%, 6.6% and 4.4% respectively.

In the Nassau-Suffolk MSA, Fleet ranked second in deposits, with a market share of 7.55%. The bank ranked first in both 1998 and 1999 for mortgage lending. Home purchase lending represented 29% of mortgage lending; home improvement represented 24% and refinance loans 47% for this MSA. The market shares for these products in 1999 were 4.1%, 21.5% and 8.1% respectively.

In the Albany-Schenectady MSA, Fleet ranked first in deposits with a market share of 16%. The bank ranked fifth in 1998 and fourth in 1999 for mortgage lending. Home purchase lending represented 18% of mortgage lending; home improvement represented 22% and refinance loans 60% for this MSA. The market shares for these products in 1999 were 1.6%, 10.5% and 7.9% respectively.

In the Syracuse MSA, Fleet ranked fourth in deposits with a market share of 11%. The bank ranked fourth in both 1998 and 1999 for mortgage lending. Home purchase lending represented 16% of mortgage lending; home improvement represented 28% and refinance loans 56% for this MSA. The market shares for these products in 1999 were 1.1%, 9.8% and 6.6% respectively.

Fleet's origination of small loans to businesses represented good responsiveness to the identified need for these products. The volume of small loans to businesses is good and reflects its relative market ranking in deposit market share and among other competitors in each of the full-scope assessment areas. The dominance of credit card companies in the market for small loans to businesses applies statewide, and also in each of the full-scope assessment areas.

During the evaluation period Fleet originated or purchased 12,649 small business loans totaling \$1.3 billion. This number of loans represents 26% of the total small business loans generated by Fleet during the evaluation period.

In the New York MSA, Fleet ranked fourteenth in 1998 and fifteenth in 1999 in small loans to businesses. Fleet's market share for small businesses for 1999 was 1.2%. In the Nassau-Suffolk MSA, Fleet ranked eighth in 1998 and ninth in 1999. Its market share for small business loans was 2.9% in 1999. In the Albany-Schenectady MSA, Fleet ranked sixth in 1998 and eighth in 1999. Its market share for small business loans was 3.1%. In the Syracuse MSA, Fleet ranked eighth in 1998 and ninth in 1999. Its market share for small business loans was 3.8% in 1999.

Fleet also originated 144,469 consumer loans totaling \$1.1 billion in the State of New York during this evaluation period and requested that we evaluate the bank's performance with respect to these products. The number of consumer loans in the state represents 23% of the overall volume of consumer loans the bank originated. Market share information is not available for consumer loans. Loan types in this category consist of motor vehicle, home equity, and other secured and unsecured.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The overall geographic distribution of Fleet's home mortgage lending is excellent based on the full-scope reviews. The geographic distribution was excellent in the Nassau-Suffolk and New York City MSAs and good in the Albany-Schenectady and Syracuse MSAs. The number of owner-occupied housing units is extremely low in the Albany-Schenectady, Nassau-Suffolk and Syracuse MSAs. In these areas, conclusion was primarily based on performance within the moderate-income geographies.

Home Purchase Loans

Fleet's geographic distribution of home purchase loans is excellent. Performance in the Nassau and New York City MSAs was excellent. Performance in the Albany and Syracuse MSAs was adequate.

Fleet's distribution of mortgage loans for home purchase in the New York and Nassau-Suffolk MSAs demonstrates excellent responsiveness, considering that the percentage of bank loans exceeds the percentage of owner-occupied units in both the low- and moderate-income geographies. The bank's market share in each of these geographies also exceeds its overall market share in the New York and Nassau-Suffolk MSAs.

In the Syracuse and Albany-Schenectady MSAs, the geographic distribution of mortgages for home purchase demonstrates adequate responsiveness. In both of these MSAs, the low volume of lending and opportunities in low-income geographies make analysis not meaningful. In both MSAs, the percentage of lending in moderate-income geographies was less than percentage of owner-occupied housing. In addition, the market share for moderate-income geographies was less than lower than the overall market share.

Home Improvement Loans

Fleet's geographic distribution of home improvement loans is

good. The geographic distribution in the Albany-Schenectady, New York City and Syracuse MSAs is considered good. Performance in the Nassau-Suffolk MSA is considered adequate.

The market for home improvement loans was dominated by one lender that captured over 80% of loans in the low- and moderate-income geographies of the New York MSA in 1998 and 1999. To a lesser extent, the same lender also dominated the Nassau-Suffolk market.

In the Albany-Schenectady and Syracuse MSAs, Fleet's distribution of lending in the moderate-income areas was slightly less than the percentage of owner-occupied housing units and its market share was also slightly less than the overall market share. In the New York City MSA, the distribution in moderate-income geographies was also slightly less than the percentage of owner-occupied housing. In low-income geographies, lending was nearly equal to the percentage of owner-occupied housing. However, the market share in both low- and moderate-income areas was less than the overall market share. In the Nassau-Suffolk MSA, the distribution of lending was less than the percentage of owner-occupied housing units and the market share in moderate-income areas was less than half of the overall market share.

Home Mortgage Refinance Loans

Fleet's distribution of mortgage loans for refinancing demonstrates adequate responsiveness in all the full-scope areas.

Fleet's performance was good in the New York City MSA and adequate in the Albany-Schenectady, Nassau-Suffolk and Syracuse MSAs.

In the New York City MSA, Fleet's geographic distribution of lending in low-income geographies exceeded the percentage of owner-occupied housing. The market share of lending in low-income geographies was slightly higher than the overall market share. In moderate-income census tracts, the distribution was nearly equal to the percentage of owner-occupied housing but the market share was less than the overall market share of lending to moderate-income geographies.

In the other full-scope MSAs, Fleet's lending distribution in moderate-income geographies was less than the percentage of owner-occupied housing. Additionally, the market share in the low- and moderate-income geographies was less than the overall market share.

Small Loans to Businesses

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

Fleet's small business lending demonstrates excellent geographic distribution, comparing percentage of loans made to the

percentage of businesses within the low- and moderate-income geographies and comparing market shares within these geographies with the bank's overall market share in each of the full-scope MSAs. Fleet's geographic distribution in all full-scope areas was considered to be excellent. Due to the small number of businesses located in low-income geographies in the Nassau-Suffolk MSA, performance in this area was not evaluated.

Fleet's distribution of small loans to businesses was above the portion of businesses located in the low-income areas in the Albany-Schenectady and Syracuse MSAs, and in the moderate-income areas in the Albany-Schenectady and New York City MSAs. Fleet's market share of small business loans exceeded its overall market share in the moderate-income areas in each of the full-scope assessment areas. In the low-income areas in all of the full-scope assessment areas, except in the New York City MSA, the market share of lending also exceeded the overall market share. In the New York City MSA, the market share in low-income geographies was slightly less than the overall market share.

Consumer Loans

Refer to Table 13 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Fleet's performance demonstrates an adequate geographic distribution of consumer loans. Performance was adequate in the Albany-Schenectady, New York City , Nassau-Suffolk and Syracuse MSAs.

Fleet's geographic distribution of lending is below the percentage of households living in low- or moderate-income geographies in the Albany-Schenectady, New York City and Syracuse MSAs. In the Nassau-Suffolk MSA, the percentage of lending in moderate-income geographies was nearly equaled the percentage of households in that geography. In this MSA, there were insufficient households in the low-income geographies to evaluate performance.

Lending Gap Analysis

Reports detailing Fleet's lending activity were reviewed to identify gaps in the geographic distribution of home mortgage loans and small loans to businesses. No unexplained conspicuous gaps were identified. Gaps in lending were identified in the New York MSA, Nassau-Suffolk, Syracuse, and Albany-Schenectady MSAs, but the number of census tracts, particularly low- and moderate-income geographies, without any lending activity is not considered significant especially when evaluated against the number of owner-occupied housing units and small businesses in those geographies.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

In the New York City MSA, affordability of housing is a significant issue. Housing is generally not affordable without a subsidy even for borrowers that are considered middle-income. Most state subsidized programs use 120% of median as the level for participation. This problem also exists within the Nassau-Suffolk MSA to a slightly lesser extent due to higher median incomes.

The overall distribution of home mortgage loans to borrowers of different income levels is good, based on good performance in all of the full-scope areas.

Home Purchase Loans

The borrower distribution of home purchase lending is good. Performance is considered to be good in all of the full-scope areas.

In the Albany-Schenectady, Nassau-Suffolk and Syracuse MSAs, the percentage of lending to low-income borrowers was significantly less than the percentage of low-income families. However, the percentage of lending to moderate-income families exceeded the percentage of those families. The market share for moderate-income borrowers in these MSAs was near to the overall market share. The market share for low-income borrowers was near to the overall market share.

In the New York City MSA, the percentage of lending to low-income families was insignificant due to the lack of affordability. The percentage of lending to moderate-income families was less than the overall percentage of such families. The market share for low-income borrowers was slightly less than the overall market

share and the market share for moderate-income borrowers exceeded the overall market share.

Home Improvement Loans

The borrower distribution for home improvement loans is good. The distribution in the Albany-Schenectady MSA is excellent, the Nassau-Suffolk and Syracuse MSAs is good and the New York City MSA is adequate.

In the Albany-Schenectady MSA, lending to low-income borrowers was well below the percentage of low-income families. However, the market share for low-income borrowers exceeded the overall market share. The percentage of lending to moderate-income borrowers exceeded the percentage of moderate-income families. The market share for moderate-income borrowers also exceeded the overall market share.

In the Nassau-Suffolk MSA, lending to low-income borrowers was well below the percentage of low-income families. However, the market share for low-income borrowers was nearly equal to the overall market share. The percentage of lending to moderate-income borrowers exceeded the percentage of moderate-income families. The market share for moderate-income borrowers also exceeded the overall market share.

In the New York City MSA, lending to low-income borrowers was very much lower than the percentage of low-income families and the market share was also much lower than the overall market share. The percentage of lending to moderate-income borrowers was slightly less than the percentage of moderate-income families. However, this market share was also much lower than the overall market share. As mentioned earlier in the report, one lender dominates the home improvement market in this MSA with over 80% of the market.

In the Syracuse MSA, lending to low-income borrowers was much lower than the percentage of low-income families but the market share to these families was only slightly less than the overall market share. The percentage of lending to moderate-income borrowers exceeded the percentage of moderate-income borrowers. However, this market share was also slightly less than the overall market share.

Home Mortgage Refinance Loans

The borrower distribution for home mortgage refinance loans is good. The distribution in all of the full-scope areas was considered to be good.

In the all full-scope areas, the percentage of lending to low-income borrowers was significantly less than the percentage of low-income families. However, in the Albany-Schenectady and Nassau-Suffolk MSAs, the market share of lending to these

families exceeded the overall market share. In the New York City and Syracuse MSAs, the market shares nearly equaled the overall market shares.

In the Nassau-Suffolk and Syracuse MSAs, the percentage of lending to moderate-income borrowers exceeded the percentage of moderate-income families. However, the market share for moderate-income borrowers was slightly less than the overall market share. In the Albany-Schenectady MSA, the percentage of lending to moderate-income borrowers nearly equaled the percentage of moderate-income borrowers and the market share was only slightly lower than the overall market share. In the New York City MSA, the percentage of lending to moderate-income borrowers was significantly less than the percentage of moderate-income families, but the market share to moderate-income borrowers was only slightly less than the overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses reflects adequate responsiveness to the credit needs of smaller businesses in the full-scope assessment areas of the State of New York. The bank's percentage of lending is well below the small business demographics in all full-scope assessment areas. However, the market shares for loans to businesses with annual revenues of \$1 million or less exceeded the overall market share for small business loans. A majority of small loans were for amounts less than \$100 thousand.

Consumer Loans

Refer to Table 13 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Fleet's distribution of consumer lending demonstrates good distribution to low- and moderate-income borrowers, particularly to moderate-income borrowers. The distribution was excellent in the Albany-Schenectady and Nassau-Suffolk MSAs and good in the New York City and Syracuse MSAs.

Fleet's distribution of lending exceeded the percentage of households for moderate-income borrowers by a ratio of more than 2 to 1 in all the full-scope assessment areas. The bank's distribution of lending exceeded the percentage of low-income borrowers in the Nassau-Suffolk MSA, approximated the percentage of low-income borrowers in the Albany-Schenectady MSA, but was significantly below the percentage of low-income borrowers in the New York City and Syracuse MSAs.

Community Development Lending

Refer to Table 1 in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending had a positive impact on the bank's overall lending activity in the Albany-Schenectady, Nassau-Suffolk and New York City MSAs. Fleet is a leader in making community development loans, particularly in the New York City and the Albany-Schenectady MSAs. Fleet's specialized commercial real estate (CRE) team has made a substantial level of community development loans. Fleet has focused on two community needs. These were low- and moderate-income housing and community revitalization to improve vacant, dilapidated public properties for all income levels in distressed communities.

In the Albany-Schenectady MSA Fleet originated 17 CD loans totaling \$25 million. This equals 9.5% of allocated Tier 1 Capital. An example of lending in this assessment area is a \$4 million loan to finance the construction of an industrial park that is located in a New York State designated Economic Development Zone.

In the Nassau-Suffolk MSA, Fleet originated 25 CD loans totaling \$119 million. This equals 20.7% of allocated Tier 1 Capital for this assessment area. Examples of CD lending in this assessment area are two loans totaling \$7.8 million originated in conjunction with the North Hempstead Housing Authority. These loans financed the gut renovation of two existing low-income public housing projects with 123 units in total.

In the Syracuse MSA, Fleet originated two CD loans totaling \$175 thousand. This equals 0.16% of allocated Tier 1 Capital for this assessment area.

In the New York City MSA, Fleet originated 134 loans totaling \$522 million. This level of lending equaled 97.6% of the allocated Tier 1 Capital for this assessment area. Examples of Fleet's community development lending are:

- Participation in a complex, multi-faceted \$25 million loan to finance the rehabilitation of a major apartment/condominium and commercial complex in the Parkchester section of the Bronx. Fleet was the lead bank in this loan, working closely with the Community Preservation Corporation. The complex contains 12,271 apartment/condominium units of which 5,909 are sold and the remaining 6,362 are sponsor-owned units. The Parkchester complex was originally built in 1939 as moderate-income rental housing. This important community development project is intended to prevent the deterioration of this large and important housing development and to stabilize the surrounding low-and moderate-income communities.

- The bank participates in New York City's Homeworks Program projects. The focus of this program is to put vacant city-owned property back into service in order to revitalize and stabilize low- and moderate-income communities. Fleet was the first bank in New York City to participate in this program. Fleet originated five loans under this program totaling \$24.9 million, which renovated and made available over 115 units of affordable housing.
- Fleet increased a \$1.2 million loan to help stabilize a low- and moderate-income community by providing additional funds to support the activities of this seriously financially troubled hospital that serves the low- and moderate-income community. The New York State Department of Health requested that the bank provide the loan to assist the financial condition of the hospital. Fleet is the only bank in the area making loans to financially troubled hospitals.

In addition to direct loans that are included Table 1, Fleet participates in New York City's 421a Bond Program used to create affordable housing. Under this program, Fleet serves as the construction administrator and provides letters of credit. These letters of credit serve as a credit enhancement for the New York City Housing Development Corporation bonds. This provides for financing of new construction or gut rehabilitation of multifamily properties for occupancy by low-income and homeless residents. Fleet has provided \$32 million in letters of credit under this program, which contributed to the creation of 458 affordable housing units.

Product Innovation and Flexibility

Product innovation and flexibility has a positive impact in evaluating the bank's performance under the lending test. Fleet's participation in these programs had a positive impact in all full-scope areas.

Fleet has developed assessment area-wide programs that are discussed in the Overall Rating Area section under Innovative/Flexible Programs. Within the Albany-Schenectady MSA, the following loans have been originated: Fleet Affordable Advantage (3/ \$143 thousand), LMI Equity Loans (6/\$121 thousand) and Second Chance Loans (234/\$888 thousand). In addition, Fleet originated FHA loans (203/\$15.9 million) and State Housing Finance Authority loans (49/ \$3.7 million). In the Nassau-Suffolk MSA, the following loans have been originated: Fleet Affordable Advantage (23/ \$3.3 million), LMI Equity Loans (32/\$615 thousand) and Second Chance Loans (468/\$2.0 million). In addition, Fleet originated FHA loans (182/\$25.1 million) and State Housing Finance Authority loans (113/\$13.3 million). In the New York City MSA, the following loans have been originated: Fleet Affordable Advantage (23/ \$3.3 million), LMI Equity Loans (2/\$33 thousand) and Second Chance Loans (997/\$3.8 million). In addition, Fleet

originated FHA loans (205/ \$34.0 million) and State Housing Finance Authority loans (95/ \$11.8 million). In the Syracuse MSA, the following loans have been originated: LMI Equity Loans (2/\$36 thousand) and Second Chance Loans (103/\$346 thousand). In addition, Fleet originated FHA loans (129/\$8.6 million) and State Housing Finance Authority loans (75/\$4.4 million).

In addition to the standard range of flexible products offered throughout the organization, Fleet has developed products that are either specific to this rated area or offered to a limited geographic area. Those include:

Jumpstart - A partnership between Fleet and the state mortgage financing agencies in four states (Rhode Island, New Hampshire, New York and New Jersey). Fleet provides an unsecured loan at the time the agency makes the first mortgage. The unsecured loan is at the first mortgage rate and is made for downpayment and closing costs. During the evaluation period, Fleet 79 loans aggregating \$438,000,

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance under the lending test in the Jamestown, Newburgh, Utica MSAs and the nonmetropolitan areas is not inconsistent with the bank's overall " Outstanding" performance under the lending test in New York. While there were no community development loans in the Jamestown and Newburgh, there are limited opportunities. Performance in the Buffalo, Dutchess County, Elmira and Rochester MSAs was weaker than the bank's overall " Outstanding" performance under the lending test. Based on Fleet's percentage of deposits in these areas, this weaker performance did not affect the overall rating for the lending test.

Refer to the Tables 1 through 11 in the State of New York section of Appendix D 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 in New York is rated " High Satisfactory" . Based on full-scope reviews, the bank's performance in the Nassau-Suffolk MSA was good, performance in the New York City MSA was excellent and performance in the Albany-Schenectady and Syracuse MSAs was adequate.

Refer to Table 14 in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

While the volume of investments throughout the state was good, the investments were not especially innovative or complex.

In the Albany-Schenectady MSA, Fleet originated 124 qualified investments for \$3.1 million. An additional, \$200 thousand was allocated to this assessment areas based on the percentage of deposits. The dollar volume of total investments represents 1.25% of allocated Tier 1 Capital. Investment opportunities in the Albany-Schenectady MSA are limited.

An example of investments in this area was a \$200 thousand equity investment in a loan fund sponsored by a CDFI. The purpose of this loan fund was to provide access to capital, primarily to low- and moderate-income individuals, for community development programs and projects.

In the Nassau-Suffolk MSA, Fleet originated 110 qualified investments totaling \$20.8 million. An additional \$500 thousand in statewide investments was allocated to this assessment area based on the percentage of the bank's deposits. This dollar volume of total investments represents 3.7% of allocated Tier 1 Capital.

An example of investments in this assessment area was multiple grants supporting a CDC. This CDC is a multi-faceted housing, community and economic development corporation dedicated to serving the needs of low- and moderate-income families and individuals. Fleet provided grants for operating support, grants for technical assistance, and to support a Section 8 Home Ownership Program. The technical assistance grants provided funds to assist small business owners with SBA loan programs. An additional grant provided monies for the CDC's loan loss reserve for their Homeownership program.

In the New York City MSA, Fleet originated 304 qualified investments totaling \$49.9 million during the evaluation period. An additional, \$500 thousand in statewide investments was allocated to this assessment area based on the percentage of the bank's deposits. This dollar volume of total investments represents 10% of allocated Tier 1 Capital. In addition, there was one investment totaling \$3.5 million originated prior to the evaluation period, which remains on the bank's books as of the examination date.

Examples of Fleet's performance in this assessment area are \$30 and \$25 thousand grants to a Business Resource Center which was established to provide technical assistance and capital access for small minority-and women-owned businesses in Queens. Fleet also provided a series of grants to a CDC operating in Harlem. This organization's mission is to create and maintain a viable community by providing affordable housing, improving the delivery of social services and fostering economic revitalization.

In the Syracuse MSA, Fleet originated 35 qualified investments

totaling \$588 thousand during the evaluation period. An additional \$98 thousand in statewide investments was allocated to this assessment area based on the percentage of the bank's deposits. This dollar volume of total investments represents 0.6% of allocated Tier 1 Capital. Opportunities for investments are very limited in this assessment area, which capacity building the primary need.

An example of the investments in this area was a \$20 thousand grant made as part of a three-year \$60 thousand grant commitment to an organization, which operates a loan fund. This loan fund will be a major financing avenue for not-for-profit community projects and for individuals purchasing homes rehabilitated through the initiative. The revolving loan fund will significantly improve the neighborhood revitalization efforts and financing options for low-income homebuyers in Syracuse.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the limited-scope assessment areas except as noted further, is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in New York.

In the Albany, Jamestown, Elmira and Syracuse MSAs the bank's performance is weaker than the bank's overall performance in the state. Fleet has a limited presence with one branch in the Elmira MSA and eight in the Jamestown MSA. Performance in the Dutchess Count and Newburgh MSAs and the nonmetropolitan areas was stronger than the bank's overall "High Satisfactory" performance. Refer to Table 14 in the State of New York section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in New York is rated "High Satisfactory". Based on full-scope reviews, the bank's performance is excellent in the Albany-Schenectady MSA, good in the Nassau-Suffolk and Syracuse MSAs, and adequate in the New York MSA.

Retail Banking Services

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

Fleet's service delivery systems, overall, are accessible to geographies and individuals of different income levels. The performance in the Albany, Nassau-Suffolk MSA and Syracuse MSAs is excellent and the New York City MSA is adequate as measured by the location of branches by income of geographies and its record of opening and closing branches.

In the Albany-Schenectady MSA, the geographic distribution of branches in the low- and moderate-income areas exceeds the percentage of the population within those areas. While there was a net decrease of four branches in this assessment area, it has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

In the Nassau-Suffolk MSA, the geographic distribution of branches in the moderate-income areas exceeds the percentage of the population within this geography. There was a net decrease of two branches in the moderate-income areas, but the change has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

In the Syracuse MSA, the geographic distribution of branches in the low-income areas is below the percentage of the population within this geography, while the geographic distribution of branches in the moderate-income areas significantly exceeds the percentage of the population within this geography. There was a net increase of one branch in the entire assessment area, it has not affected the accessibility of its delivery systems.

In the New York City MSA, the geographic distribution of branches in the low- and moderate-income areas is significantly below the percentage of the population within those areas. However, Fleet does operate 15 FCB branches within this assessment area. The net increase of one branch each in the low-income and moderate-income areas has not significantly affected the accessibility of its delivery systems. Fleet does have plans to open more branches within this assessment area but these openings will be considered in the next evaluation period.

The range of services provided and business hours do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income geographies and low- and moderate-income individuals.

Fleet's hours and services offered throughout the full-scope areas do not vary in a way that inconveniences any portion of the assessment areas. There are no material differences in services provided throughout the branch network.

Community Development Services

Community development services provided by the bank demonstrate responsiveness to the needs of the community. Community development services were excellent in the New York City and Nassau-Suffolk MSAs and good in the Albany and Syracuse MSAs. The services consisted of the involvement by bank staff in the boards and committees of various community groups, and the providing of technical assistance to various community groups

through external seminars and other forms of technical assistance. These seminars are targeted at various individuals including first-time homebuyers and small business owners. Topics include Basic Banking, Managing Money, Credit/Lending Basics, School Savings, Financial Budget, and SBA Loan Preparation. Fleet provides many of these seminars with community groups or leaders as co-sponsors.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in all the limited-scope assessment areas, except as discussed further, is not inconsistent with the bank's overall "High Satisfactory" performance under the service test in New York. Refer to Table 15 in the State of New York section of Appendix D for the facts and data that support these conclusions.

The bank's performance under the service test in the Buffalo and Dutchess County MSAs is stronger than the bank's overall performance in the state. The geographic distribution of branches in the low- and moderate-income areas exceeds the percentage of the population within those geographies. The bank's performance in the Elmira and Newburgh MSAs is weaker than the bank's overall performance in the state. The geographic distribution of branches in the low- and moderate-income areas is below the percentage of the population within those geographies.

Appendix A: Scope of Evaluation

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): (01/01/1998 to 12/31/2000) Investment and Service Tests and CD Loans: (01/01/1998 to 6/30/2001)	
Financial Institution	Products Reviewed	
Fleet National Bank (Fleet) Providence, RI	Home mortgage loans, small business loans, consumer loan, CD loans, qualified investments, community development services and branch services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Fleet Mortgage Company (FMG) Fleet Development Ventures Fleet CDC - RI Fleet CDC - NJ Fleet Securities BancBoston Capital Bank Boston Development Corp	Bank subsidiary Bank subsidiary Bank subsidiary Bank subsidiary Holding Co. Sub Holding Co. Sub Holding Co. Sub	Home mortgage loans and Services CD Loans, Investments and Services CD Loans, Investments and Services CD Loans, Investments and Services Investments and Services CD Loans, Investments and Services CD Loans, Investments and Services
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Boston Multistate MSA Lawrence Multistate MSA New London Multistate MSA	Full Scope Full Scope Full Scope	Entire MSA Entire MSA Entire MSA plus non-MSA portions of New London, Middlesex and Windam counties
Portsmouth Multistate MSA Providence Multistate MSA	Full Scope Full Scope	Entire MSA Entire MSA plus non-MSA portions of Rhode Island

State of Connecticut Bridgeport CT MSA Hartford CT MSA	Full Scope Full Scope	Entire MSA Entire MSA plus a portion of Litchfield county
Danbury CT MSA New Haven CT MSA Stamford CT MSA Waterbury CT MSA	Limited Scope Limited Scope Limited Scope Limited Scope	Entire MSA Entire MSA Entire MSA Entire MSA
State of Florida West Palm Beach FL MSA	Full Scope Limited Scope	Entire MSA Entire MSA
Sarasota FL MSA		
State of Maine Portland ME MSA Bangor ME MSA Lewiston ME MSA Maine Non-MSA Areas	Full Scope Limited Scope Limited Scope Limited Scope	Entire MSA Entire MSA Entire MSA Cumberland, Kennebec, Knox, Lincoln, Sagadahoc and York counties
State of Massachusetts Springfield MA MSA Worcester MA MSA Barnstable MA MSA	Full Scope Full Scope Limited Scope	Entire MSA Entire MSA Entire MSA plus non-MSA
Brockton MA MSA Fitchburg MA MSA Lowell MA MSA New Bedford MA MSA Western MA Non-MSA	Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Barnstable, Dukes and Nantucket counties Entire MSA Entire MSA Entire MSA Entire MSA Non-MSA portions of Franklin, Hampshire and Worcester counties
State of New Jersey Middlesex NJ MSA Newark NJ MSA Atlantic NJ MSA Bergen NJ MSA Jersey City NJ MSA Monmouth NJ MSA Philadelphia MSA Trenton NJ MSA	Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire NJ portion of MSA Entire MSA
State of New Hampshire Nashua NH MSA Manchester NH MSA NH Non-MSA Areas	Full Scope Limited Scope Limited Scope	Entire MSA Entire MSA Belnap, Cheshire, Grafton, and Merrimack counties
State of New York Albany-Schenectady NY MSA	Full Scope	
Nassau NY MSA New York City NY MSA Syracuse NY MSA Buffalo NY MSA Dutchess County NY MSA Elmira NY MSA Jamestown NY MSA Newburgh NY MSA Rochester NY MSA	Full Scope Full Scope Full Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Entire MSA, Fulton county and city of Glens Falls Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA Entire MSA

Utica NY MSA NY Non- MSA Areas		Entire MSA Entire MSA Allegany, Cattaraugus, Columbia, Cortland, Greene, Schuyler, Seneca, Steuben, Sullivan, Tompkins, Ulster, Wyoming, and Yates counties.
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**Appendix B: Summary of Multistate Metropolitan Area
and State Ratings**

RATINGS		Fleet National Bank		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Fleet National Bank	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Boston MA-NH Multistate MSA	Outstanding	Outstanding	Outstanding	Outstanding
Lawrence MA-NH Multistate MSA	Outstanding	Outstanding	High Satisfactory	Outstanding
New London-Norwich CT-RI Multistate MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Portsmouth NH-ME Multistate MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Providence-Fall River RI-MA Multistate MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
State Ratings:				
State of Connecticut	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
State of Florida	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Maine	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Massachusetts	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of New Hampshire	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New Jersey	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of New York	Outstanding	High Satisfactory	High Satisfactory	Outstanding

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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Boston, MA-NH Multistate MSA (#1120)

Demographic Information for Full Scope Area: Boston, MA-NH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	711	6.75	23.07	44.87	22.78	2.53
Population by Geography	3,226,843	3.94	20.39	51.02	24.56	0.08
Owner-Occupied Housing by Geography	691,701	0.88	12.69	55.29	31.14	0.00
Business by Geography	158,946	6.08	15.03	47.46	31.42	0.02
Farms by Geography	2,965	1.18	9.61	53.96	35.21	0.03
Family Distribution by Income Level	796,836	19.30	18.07	24.04	38.59	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	297,744	6.81	29.68	50.39	13.12	0.00
Median Family Income		48,688	Median Housing Value	195,887		
HUD Adjusted Median Family Income for 2000		65,500	Unemployment Rate (Dec 2000	1.7%		
Households Below Poverty Level		8.69%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Boston, MA-NH assessment area includes all of the 711 census tracts in the multistate MSA. It covers a broad area of Massachusetts stretching from the southern coastline of Barnstable County up to New Hampshire on the north, and west from the metropolitan area of Boston to Worcester County. This area covers a wide array of geography including small towns and communities to densely populated suburban and urban communities in the City of Boston. It includes the counties of Suffolk and Norfolk, as well as portions of Plymouth, Bristol, Essex, Middlesex, Worcester counties, and one town in Rockingham county, New Hampshire.

Fleet holds the greatest deposit market share at 38% (based on June 30, 2000 FDIC Deposit Market Share Reports). There are 200 branches and 939 ATMs in the assessment area. This multistate MSA contains the largest share of the bank's total deposits at 39.5%. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 13.15%, small business loans are 21.81%, and consumer loans are 28.44%.

Major mortgage competitors include Dime Savings, Chase Manhattan, Bank of America, NA, Countrywide Home Loans, and Citizens Bank & Mortgage Company. In the small business-lending arena, Fleet competes with American Express Centurion Bank, Capital One F.S.B, and Advanta Bank Corporation.

Boston's economy was among the hardest hit in the United States by the recession of the late 1980s and early 1990s. However, it has undergone a tremendous recovery evidenced by a 21% rise in MSA median income between 1990 and 2000. Currently, the Boston economy is robust following a rebound in the mid-90s coupled with a strong United States economy. The growth of information

technology (IT) and mutual fund industries as well as pharmaceutical startups helped fuel recovery of the economy following the collapse of the defense contracting and computer manufacturing industries.

The Boston MSA is now the top MSA in IT employment nationwide. It is also a center for biomedical research and development and high tech manufacturing. Boston is the business capital of New England, and it is also home to the most prestigious universities and research institutions in the country. Primary employers include FleetBoston Financial Corporation, Harvard University, Verizon Communications, and Fidelity Investments.

The unemployment rate (not seasonally adjusted) of the MSA declined to 1.7% in December 2000 from a high of 5.3% in 1990. An expansion in the financial services sector, particularly by mutual fund companies, has fueled the demand for labor, which has been in short supply. This labor shortage has been the number one constraint on the Boston economy.

Over 67% of the 169 income tracts in the City of Boston are low- or moderate-income, compared with 30% for the entire MSA. A 50% increase in the median price of an existing home between 1990 and 1999 has placed significant downward pressure on housing affordability in Boston. Areas typically considered affordable have witnessed one-year increases in housing prices of 20% to 50%. Moreover the high costs of land and construction have constrained new development, particularly of affordable housing.

As part of the evaluation, we met with five community groups involved in housing, and community and economic development. Identified needs are affordable housing mortgages, although the volume of possibilities is lower, as mentioned in the previous paragraph. Also, while there is a large opportunity for low cost loans to the various community organizations, equity financing is an even greater need, allowing the individual organizations to develop customized mortgage products they can then provide to consumers.

Lawrence, MA-NH Multistate MSA (#4160)

Demographic Information for Full Scope Area: Lawrence, MA-NH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	75	13.33	16.00	53.33	14.67	2.67
Population by Geography	353,409	7.59	15.35	60.84	16.21	0.00
Owner-Occupied Housing by Geography	80,537	1.68	8.50	69.27	20.54	0.00
Business by Geography	15,081	9.52	8.62	64.13	17.72	0.00
Farms by Geography	365	1.10	3.56	70.14	25.21	0.00
Family Distribution by Income Level	93,535	20.08	16.91	25.67	37.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,600	13.83	23.86	55.38	6.94	0.00
Median Family Income		46,609	Median Housing Value		156,342	
HUD Adjusted Median Family Income for 2000		60,800	Unemployment Rate (Dec 2000		3.00%	
Households Below Poverty Level		9.26%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Lawrence multistate assessment area includes all of the 75 census tracts in the MSA and covers portions of northern Massachusetts and Southern New Hampshire and includes sections of Essex and Rockingham counties. The cities of Lawrence and Haverhill are within the MSA, with Lawrence as the principal city. Fleet has the largest branch presence with 17 branches and 50 ATMs. It holds the greatest deposit market share at 21% (based on June 30, 2000 FDIC Deposit Market Share Reports).

Major mortgage competitors include Countrywide Home Loans, Dime Savings Bank, Norwest Funding & Mortgage and Citizens Bank & Mortgage Company. In the small business-lending arena, Fleet competes with American Express Centurion Bank and Capital One F.S.B.

Economic conditions remain strong. Prosperity in the MSA is evident by the 30% increase in the median family income between 1990 to 2000 to \$60,800. Conversely, the City of Lawrence has had the lowest median income in the state. Lawrence is among the poorest and most economically distressed areas in the state. In the past, Lawrence was the center of the textile industry; however, many of these mills were vacated over the last 30 years and are still vacant today. As a result, the city has undergone economic degeneration. In contrast, the surrounding communities including Andover, North Andover and Windham, MA and Salem, NH are among the wealthiest in the region and have benefited from the growth in high tech manufacturing.

The unemployment rate for the MSA dropped to 3% in 2000, the lowest level in a decade; conversely Lawrence's rate has historically been three times the state average. Population growth between 1990 and 1999 was 7.8%, primarily from a large

influx of immigrants, with some portion attributed to migration of residents from the Boston area to the more affordable suburban communities in the assessment area. Significant language and education barriers exist because many of the new immigrants have received very little education or training in English in their home countries, and as a result, they have had difficulty obtaining jobs and housing.

The City of Lawrence has a high concentration of low- and moderate-income areas and population, with 17 out of 18 tracts classified as low- or moderate-income. The city contains all but one of the 10 low-income tracts in the MSA. According to a 1998 study conducted by the City of Lawrence, most small businesses were financially unstable and were owned by people with limited educational background and/or little understanding of small business finance.

Unlike other parts of the region where supply has been the major obstacle to homeownership, the poor condition of existing housing is the problem in Lawrence. Construction of affordable housing in the last few years has been minimal. Housing prices in the city of Lawrence doubled between 1995 and 2000 from \$52,000 to \$118,000 for a single-family home. A lack of credit among prospective homeowners and little education or technical assistance regarding establishment of credit and homeownership is another barrier to homeownership.

As part of the evaluation, we considered information from three community contacts involved in community development, city planning and small businesses. Identified needs are multi-family loan financing, small business working capital loans, and homebuyer education seminars and loan programs. The City of Lawrence has the greatest need for community and economic development including community development investments.

New London-Norwich CT-RI Multistate MSA (#4560)

Demographic Information for Full Scope Area: New London-Norwich CT-RI MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	85	3.53	16.47	52.94	20.00	7.06
Population by Geography	336,583	1.30	19.23	57.91	20.39	1.18
Owner-Occupied Housing by Geography	81,138	0.29	11.63	62.61	25.47	0.00
Business by Geography	15,941	3.18	15.22	54.91	26.69	0.00
Farms by Geography	481	0.21	6.65	62.99	30.15	0.00
Family Distribution by Income Level	89,634	16.55	19.74	26.50	37.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,525	2.35	30.21	54.54	12.90	0.00
Median Family Income		42,554	Median Housing Value		151,382	
HUD Adjusted Median Family Income for 2000		52,971	Unemployment Rate (Dec 2000		1.4%	
Households Below Poverty Level		6.72%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The New London-Norwich multistate assessment area is located in southeastern Connecticut and borders Rhode Island to the east and Long Island Sound to the south. It includes all of the 75 census tracts in the MSA encompassing parts of New London, Middlesex, and Windham counties in Connecticut and Washington County in Rhode Island. It also includes 10 non-MSA tracts in Middlesex, New London and Windham counties. These areas do not extend substantially beyond the boundary of the MSA. Fleet ranks third in deposit market share with 13.8%, behind Citizens Bank of Connecticut at 16.4% and People's Bank at 15.6%. This is based on June 30, 2000 FDIC Deposit Market Share Reports. Subsequent to the BankBoston merger, Fleet has the greatest branch network with 21 branches and 47 ATMs. This AA holds 0.76% of the bank's total deposits; and 1.15% of home mortgage, 1.25% of small business, and 0.87% of consumer loan originations.

Major mortgage competitors include Chelsea Groton Savings Bank, Dime Savings Bank of Norwich, Citizens Bank & Mortgage Company, People's Bank and Charter Oak Federal Credit Union. In the small business-lending arena, Fleet competes with American Express Centurion Bank and Capital One F.S.B.

Economic growth remained strong throughout 2000 with a positive near-term outlook. Traditionally, the economy has been dominated by the transportation industry in general and the shipbuilding segment of that industry in particular. The Electric Boat Corporation, a division of General Dynamics, has long been a dominant employer, but it has fallen to second place because of defense cutbacks and the rise of the Foxwoods Casino.

The other major employers are Mohegan Sun Casino and Pfizer, Inc.

The MSA's unemployment rates have decreased significantly since 1990, when the unemployment rate was 5.2%. The unemployment rate was low in 1999 at 3.2%, but was above the state average of 2.9%.

As of December 2000, the unemployment rate (not seasonally adjusted) declined to 1.4%. The low unemployment rate is just as much a function of a decline in labor force growth, fueled by a persistent net out-migration, as it is robust job growth.

There were only 3 low-income tracts and 14 moderate-income tracts in the assessment area, concentrated primarily in the cities of New London and Norwich. Housing prices increased from \$159,000 in 1990 to \$200,000 in 1999, while the median family income increased 27% over the same time period. However, affordability remained an issue for low- and moderate-income residents. The housing stock in the lower income tracts is old and in need of rehabilitation, which becomes a cost issue for many residents particularly for the elderly on fixed incomes. The total population in the assessment area declined by about 5,000 persons from 1990 to 1999; however the elderly population (persons over age 65) grew by 8.1%. There is also very limited opportunity for new development of housing.

As part of the evaluation, we considered information from two recently completed community contacts involved in affordable housing. Identified needs are lack of affordable housing stock further limited by extensive renovations required, and rental housing. Also, most clients of the community development agency contacted have credit issues that prevent them from qualifying for most loan programs, including those offered by the non-profits. Opportunities for banks to be involved are lower interest rate home mortgages, providing flexible acquisition funding to housing agencies in the area, and offering favorable fees and terms and more flexibility in structuring construction loans to non-profit housing agencies. There is also an opportunity for area banks to make more charitable donations. Service opportunities include providing more home ownership training, and cashing social security and welfare checks at no charge regardless of account holder status. Overall, opportunities for community development lending are relatively limited in this small assessment area.

Portsmouth, ME-NH Multistate MSA (#6450)

Demographic Information for Full Scope Area: Portsmouth, ME-NH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	0.00	9.80	66.67	13.73	9.80
Population by Geography	224,068	0.00	8.62	78.96	12.17	0.25
Owner-Occupied Housing by Geography	54,632	0.00	4.94	83.37	11.68	0.00
Business by Geography	12,877	0.00	8.40	78.99	12.61	0.00
Farms by Geography	392	0.00	3.57	76.53	19.90	0.00
Family Distribution by Income Level	58,398	15.98	20.20	27.73	36.10	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	21,127	0.00	12.65	82.08	5.28	0.00
Median Family Income		40,510	Median Housing Value	138,815		
HUD Adjusted Median Family Income for 2000		52,300	Unemployment Rate (Dec 2000	1.8%		
Households Below Poverty Level		7.03%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Portsmouth NH-ME assessment area includes the entire metropolitan area and is located on the New Hampshire and southern Maine seacoasts. It is about 50 miles north of Boston and includes York, Rockingham, and Strafford counties. Fleet ranked third in deposit market share with 9% as of June 30, 2000 with 13 branches and 21 ATMs. One of these branches is located in a census tract designated as NA and therefore is not included in Table 15. Ahead of Fleet were Bank of New Hampshire and Citizens Bank and are also considered strong deposit and lending competitors.

Historically, this area has been a regional transportation and commercial center, but has been undergoing a transformation to a high tech and services based economy. Service industries including local, county, and state government agencies are the largest employers. Retail trade is the second largest and manufacturing is a distant third.

Portsmouth has been in the midst of economic expansion. From 1990 to 1999, area population increased by 8% and the number of households grew 12.3%. The tremendous growth in the area has put considerable pressure on housing prices and making affordability difficult for moderate-income families. The shortage of affordable housing is exacerbated by the lack of available land, combined with an aged housing stock in need of rehabilitation. The seasonally unadjusted unemployment rate for December 2000 was 1.8% and well below the national rate of 3.7%.

Community contacts with statewide coverage define primary credit needs as loans to support affordable housing purchase and repair.

Providence-Fall River RI-MA Multistate MSA (#6480)

Demographic Information for Full Scope Area: Providence-Fall River RI-MA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	274	4.01	21.90	54.38	17.52	2.19
Population by Geography	1,199,730	2.29	19.31	58.94	19.32	0.14
Owner-Occupied Housing by Geography	265,257	0.63	9.64	65.70	24.03	0.00
Business by Geography	49,728	4.47	15.17	61.22	19.13	0.00
Farms by Geography	1,290	0.39	6.51	66.90	26.20	0.00
Family Distribution by Income Level	314,103	19.25	17.88	25.31	37.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	116,626	3.77	29.76	55.59	10.88	0.00
Median Family Income		38,902	Median Housing Value		134,703	
HUD Adjusted Median Family Income for 2000		49,946	Unemployment Rate (Dec 2000		3.1%	
Households Below Poverty Level		10.7%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Providence-Fall River multistate assessment area includes all of the 255 census tracts in the MSA, encompassing Providence and Kent Counties and portions of Newport and Washington Counties in Rhode Island, and Bristol County in both Massachusetts and Rhode Island. It also includes 18 non-MSA tracts in Newport and one non-MSA tract in Washington County in Rhode Island. These 18 non-MSA tracts are comprised of four towns and do not extend substantially beyond the boundaries of the MSA areas. Fleet ranks second in deposit market share with 28%, behind Citizens Bank of Rhode Island at 36%. This is based on June 30, 2000 FDIC Deposit Market Share Reports. Fleet has the greatest branch network with 64 branches and 157 ATMs among competitors. This assessment area holds 4.9% of the bank's total deposits, and 4.9% of the HMDA loans, 8.8% of small business loans, and 8.5% consumer loans.

Major mortgage competitors include Dime Savings Bank, Citizens Bank & Mortgage Company, and First Federal Savings Bank. In the small business-lending arena, Fleet competes with American Express, Centurion Bank and Capital One F.S.B.

The economy has been stable during the last several years, however it remains one of the weaker economies in the Northeast.

The labor force and employment opportunities grew very slowly because of the concentration in manufacturing, defense, and low-tech industries. Financial services are a growing industry. Close proximity to the mutual fund hub Boston creates opportunities for financial firms that are fleeing Boston's high costs to utilize the area's more accessible office market as well as its larger pool of available labor. Seven of the top 20 employers are hospitals or health service organizations, comprising more than 11% of total employment. Major employers are Lifespan Corporation, Brown University and FleetBoston

Financial Corporation. The unemployment rate for the MSA decreased dramatically from 7.3% in 1990 to 3.1% as of December 2000 (not seasonally adjusted).

Most of the low- and moderate-income tracts are concentrated in the city of Providence. There is a smaller concentration of low- and moderate-income tracts in the cities of Fall River, Newport and the Woonsocket areas. Providence's housing stock is old and in need of rehabilitation, especially in the low-income areas and for its low-income, and often elderly, residents. During much of the decade, housing affordability in Providence was good, though, in recent years, housing prices have escalated. The migration of Boston residents into Rhode Island put pressure on home prices. Although single-family housing prices advanced at a slower pace than the national average, they grew faster than personal income, eroding housing affordability for Providence residents.

Bank management indicated that there was a significant need for affordable housing in the assessment area, but noted that very little land was available for building new structures. Options identified included either rehabilitating or demolishing and rebuilding properties to create affordable units. The city and state have not devoted significant resources to affordable housing initiatives over the last few years, as much of their focus in its continuing efforts to revitalize the downtown area had been on the economic redevelopment initiatives in Providence. Community development opportunities are limited in a competitive environment.

As part of the evaluation, we conducted a community contact involved in the development of low- and moderate-income housing in Providence. An identified credit need is a good financing vehicle for home repairs, and service opportunities exist for more banks offering individual development accounts. We also reviewed two recently completed community contacts involved with affordable housing in Fall River. Identified needs are multifamily housing, commercial rental properties, lead abatement, minority business development corporations, mobile home financing, and an investor consortium to improve or refinance elderly developments. Also, financial expertise of banks is needed by many organizations.

State of Connecticut Full-Scope Areas

Bridgeport CT MSA (#1160)

Demographic Information for Full Scope Area: Bridgeport CT MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	114	12.28	16.67	46.49	23.68	0.88
Population by Geography	443,722	7.55	14.30	53.06	25.07	0.02
Owner-Occupied Housing by Geography	110,346	1.84	7.54	59.52	31.10	0.00
Business by Geography	20,809	6.25	12.20	54.62	25.90	1.03
Farms by Geography	517	1.93	4.84	54.16	39.07	0.00
Family Distribution by Income Level	118,865	19.51	18.01	24.11	38.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	44,597	14.10	21.51	51.27	13.11	0.00
Median Family Income		48,221	Median Housing Value		181,498	
HUD Adjusted Median Family Income for 2000		72,000	Unemployment Rate (Dec 2000		1.7%	
Households Below Poverty Level		7.79%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Bridgeport assessment area includes all of the 114 census tracts in the MSA and is located in the southern most part of Connecticut and includes Fairfield County and parts of New Haven County. The MSA includes the city of Bridgeport, which includes all of the low-income tracts and 15 out of the 19 moderate-income tracts in the MSA. Fleet has 24 branches and 49 ATMs in the AA.

It holds the second greatest deposit market share at 19%; People's Bank ranks first with 42% (based on June 30, 2000 FDIC Deposit Market Share Reports). The Bridgeport MSA holds 1.44% of the bank's total deposits. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 2.0%, small business loans are 1.8%, and consumer loans are 1.2%.

Major mortgage competitors include People's Bank, Charter One Bank, and Citibank, F.S.B. In the small business-lending arena, Fleet competes with American Express Centurion Bank, Capital One F.S.B, Chase Manhattan Bank, and People's Bank.

The services, trade and manufacturing industries are the largest employers in the area. The unemployment rate (not seasonally adjusted) was 1.7% as of December 2000. Prosperity in the MSA is evident by the 49% increase in the median family income to \$72,000 from 1990 to 2000. Conversely, in Bridgeport's low- and moderate-income neighborhoods, disinvestment led to high residential vacancies, deterioration of properties, and housing abandonment. As the home to Sikorsky Aircraft, Bridgeport suffered from the end of the Cold War and lost 10% of its jobs

between 1992 and 1996, while the national economy was recovering strongly.

Bank management indicated that affordable housing continues to be a major community development need in Bridgeport. This is despite the fact that the city has not seen significant housing appreciation due to the concentration of properties in need of rehabilitation and population loss in some areas, especially low- and moderate-income tracts. In addition, Bridgeport has the highest property tax in the State of Connecticut, driving the overall cost price of living up, discouraging reinvestment and creating affordability problems for low-income households. There are limited opportunities for home mortgage lending in Bridgeport due to low number of owner occupied units in low- and moderate-income areas. Affordable housing development is particularly challenging. The low-income tracts are already 95% developed, hampering affordable housing development which generally entails demolishing an old building and addressing any historic and environmental issues, which is a significant cost burden added to construction costs.

As part of the evaluation, we conducted a community contact involved in the rehabilitation of multi-family residential housing in Bridgeport. An identified credit need is very small loans for homeowner improvements and small business owners. Service opportunities exist for more branches in the low- and moderate-income neighborhoods.

Hartford CT MSA (#3280)

Demographic Information for Full Scope Area: Hartford CT AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	308	9.74	12.99	55.52	19.48	2.27
Population by Geography	1,191,336	7.44	12.70	60.37	19.05	0.44
Owner-Occupied Housing by Geography	289,158	1.33	7.19	67.43	24.05	0.00
Business by Geography	54,698	5.95	11.67	58.89	22.40	1.09
Farms by Geography	1,529	0.52	5.56	63.64	30.15	0.13
Family Distribution by Income Level	314,524	17.54	18.44	26.84	37.17	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	113,177	14.01	18.20	57.65	10.14	0.00
Median Family Income		48,261	Median Housing Value		164,615	
HUD Adjusted Median Family Income for 2000		61,102	Unemployment Rate (Dec 2000)		1.5%	
Households Below Poverty Level		7.2%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Hartford assessment area includes all of the 298 census tracts in the MSA and also includes 10 non-MSA tracts in

Litchfield County. These 10 non-MSA tracts consist of only one town and do not extend substantially beyond the boundaries of the MSA. The assessment area is located in the north central part of Connecticut and includes Hartford and Tolland counties, as well as parts of Litchfield, Middlesex, New London and Windham counties. The majority (26 of 30) of low-income tracts in the assessment area are within the city of Hartford, and three are in the city of New Britain. Fifty-five percent of the moderate-income tracts are also located within these two cities, with the remainder scattered throughout the MSA. Fleet holds the greatest deposit market share at 36% (based on June 30, 2000 FDIC Deposit Market Share Reports). There are 64 branches and 152 ATMs in the assessment area. The Hartford assessment area holds 8.2% of the bank's total deposits. As a percentage of the bank's total loan originations in this AA, home mortgages comprise 4.2%, small business loans are 6.55%, and consumer loans are 4.67%.

Major mortgage competitors include Countrywide Home Loans, People's Bank, First Union, Webster Bank, and The McCue Mortgage Company. In the small business-lending arena, Fleet competes with American Express Centurion Bank, Capital One F.S.B, and Webster Bank.

Hartford has not shared in the buoyant national growth of the 1990's. The financial services industry, particularly the insurance business, is the backbone of Hartford's economic base, but has been experiencing consolidations and negative growth. Major employers include Citigroup Inc., CIGNA Corporation, Fleet Boston Financial Corporation, Pratt & Whitney and Hartford Insurance Group. Other important industries such as aerospace and transportation have also experienced negative growth.

Growth in the Hartford economy appeared to be slowing during 2000. Contributing to the weakening economy were ongoing job cuts in light manufacturing and a lack of job gains in the insurance industry. Compounding the trend was shrinking labor market, as actual employment grew more rapidly than the labor force. The unemployment rate (not seasonally adjusted) in Hartford declined significantly from 7.0% in 1990 to 1.5% in December 2000. The prices for existing homes were declining with the Hartford area population during most of the 1990s, but rebounded in the past several years. The median sales price for an existing home was over \$149,000 in 1999, while the median price for a new home climbed to \$202,000.

Bank management indicated that the assessment area has significant community development needs. The greatest need is for affordable housing, which is particularly challenging due to the lack of available land for development. The high cost of demolition and environmental clean up further limit development projects. Hartford also lacks strong, community-based organizations that can help facilitate initiatives.

As part of the evaluation, we considered information from five community contacts involved in community development, housing services, business development, and research. Identified housing needs are affordable housing rehabilitation, affordable housing mortgages, low-income housing purchases, and below market capital and gap financing related to development. Small business needs include micro-small and small business loans, and credit for small business start-ups.

State of Florida Full-Scope Areas

West Palm Beach FL MSA (# 8960)

Demographic Information for Full Scope Area: West Palm Beach MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	211	4.74	21.33	41.23	30.81	1.90
Population by Geography	863,518	3.05	21.73	46.83	28.15	0.25
Owner-Occupied Housing by Geography	262,894	0.94	20.87	46.30	31.90	0.00
Business by Geography	60,227	2.38	17.82	43.86	34.81	1.13
Farms by Geography	2,122	3.30	14.33	52.12	29.97	0.28
Family Distribution by Income Level	244,633	18.84	19.04	22.59	39.53	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	92,669	5.05	32.60	46.64	15.72	0.00
Median Family Income		38,539	Median Housing Value		135,973	
HUD Adjusted Median Family Income for 2000		56,600	Unemployment Rate (Dec 2000		3.5%	
Households Below Poverty Level		8.64%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The West Palm Beach assessment area is located north of Fort Lauderdale and includes all of the 211 census tracts in Palm Beach County. Fleet has a very limited presence in this market with three branches, two in Boca Raton and one in Delray Beach. One of the Boca Raton branches is not traditional, but is a limited service branch focusing on private banking clients. The Delray Beach branch and the traditional branch in Boca Raton contain ATMs.

Fleet's market share of deposits is very small, constituting 0.6% (based on June 30, 2000 FDIC Deposit Market Share Reports). This assessment area holds only 0.13% of the bank's total deposits, with 1.8% home mortgage, 0.05% small business, and 0.13% consumer loan originations. Competition is found in the large retail banks in the area, including Bank of America (NationsBank), First Union, Washington Mutual Bank, and SunTrust Bank.

The city's climate, quality of life, available labor, and low labor costs have lured both businesses and a large concentration of wealthy retirees. Over the past decade, housing prices have significantly increased, and the population has grown by an estimated 22%. The community has the third-highest per capita income in the nation. This is in spite of the fact that it has relatively high unemployment rates with a tourist and agrarian-driven economy. The MSAs unemployment rate (not seasonally adjusted) was 3.5% as of December 2000, higher than the statewide Florida level of 3.2%.

Local economic conditions are strong with positive expectations. The service sector employs about 41 percent of total employment. The county is Florida's largest agricultural one. The major employers are Pratt & Whitney and Columbia Palm Beach Healthcare Systems. Other large sources of employment are public services including hospitals, government, and education.

As part of the evaluation, we reviewed three recently completed community contacts conducted. The groups are involved in community development, city planning, and financing needs of small businesses. Identified needs are affordable rental and single family housing, home renovations, construction/permanent, and home mortgage and redevelopment commercial loans. Homebuyer education classes and credit counseling were also identified. Opportunities exist for flexible financing and technical assistance for small businesses. Overall, community development opportunities are characterized as good.

State of Maine Full Scope Area

Portland ME MSA (#6400)

Demographic Information for Full Scope Area: Portland ME MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	62	8.06	14.52	61.29	12.90	3.23
Population by Geography	221,295	3.90	9.80	71.72	14.57	0.01
Owner-Occupied Housing by Geography	55,384	0.86	5.85	75.30	17.99	0.00
Business by Geography	12,884	5.93	18.05	63.14	12.88	0.00
Farms by Geography	333	2.40	7.51	72.37	17.72	0.00
Family Distribution by Income Level	58,106	17.08	19.73	26.29	36.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	21,386	6.13	12.35	72.24	9.27	0.00
Median Family Income		39,346	Median Housing Value	118,526		
HUD Adjusted Median Family Income for 2000		49,000	Unemployment Rate (Dec 2000	1.2%		
Households Below Poverty Level		8.58%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Portland assessment area is located in Southern Maine along the Atlantic Coast. It is comprised of the counties of York and Cumberland and includes the entire metropolitan area. Portland is the largest city in the state. The area is predominantly comprised of middle-income tracts with some low-income tracts surrounding the city of Portland. Fleet has a significant presence with 14 branches and 34 ATMs and ranks second in deposit market share at 24% as of June 30, 2000, behind People's Heritage Bank with 35.5% of the market share. This assessment area holds .73% of the bank's total deposits, and 1.42% of the HMDA loans, 1% of small business loans, and .73% consumer loans. Major lending competitors include People's Heritage, Key Bank, Downeast Mortgage, Norwest Mortgage, and Town & Country Credit Union.

A diversification of the economy has led to above average job and income growth. Much of this diversification has been fueled by expansion of the wholesale trade sector and a booming regional economy. Major employers include the Maine Medical Center, UNUM Life Insurance Company, Shaw's Supermarkets, Inc., Manpower Temporary Services, and LL Bean, Inc. The seasonally unadjusted unemployment rate for December 2000 in the Portland MSA was 1.2%, well below the state at 2.6% and the national rate of 3.7%.

Portland's population growth of 5.8% between 1990 and 1999 exceeded the rate of growth for the State of Maine. Families and households in search of a more affordable standard of living than in other metro areas such as Boston, MA or Manchester, NH have been migrating to Portland. Home values increased 30% over the last decade, but remained 50% lower than the rest of the New

England, particularly the Boston area. However, there is a shortage of low- and moderate-income housing, with only 6.8% of owner-occupied units located in low- and moderate-income tracts as of the most recent census data (1990). As part of the evaluation, we reviewed four recently completed community contacts conducted. Community contacts have identified affordable housing as a primary credit need.

State of Massachusetts Full Scope Areas

Springfield MA MSA (#8000)

Demographic Information for Full Scope Area: Springfield MA MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	120	10.83	11.67	53.33	19.17	5.00
Population by Geography	596,775	9.72	10.61	59.39	19.99	0.29
Owner-Occupied Housing by Geography	131,071	1.58	6.20	66.38	25.84	0.00
Business by Geography	23,289	7.60	14.83	59.20	17.79	0.57
Farms by Geography	718	0.97	4.46	62.95	31.62	0.00
Family Distribution by Income Level	149,868	20.90	16.49	24.36	38.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	56,034	15.36	15.03	58.27	11.33	0.00
Median Family Income		38,097	Median Housing Value		122,485	
HUD Adjusted Median Family Income for 2000		47,500	Unemployment Rate (Dec 2000		2.4%	
Households Below Poverty Level		12.1%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Springfield assessment area is the second largest by population in Massachusetts and includes the entire metropolitan area. Following the merger with BankBoston at the end of 2000, Fleet had 43 branches and 122 ATMs in the Springfield area. Fleet was the largest depository institution in Springfield with 18.7% total market share as of June 30, 2000. First Massachusetts Bank, NA is the closest competitor with 17% of the deposit market share. This assessment area holds 1.54% of the bank's total deposits, and 1.66% of the HMDA loans, 1.54% of small business loans, and 3.21% consumer loans. Consolidation among large banks in the 1990's changed the landscape in Springfield. Thus, a majority of Fleet's competitors are local savings bank including Peoples Savings Bank. Major lending competitors include Countrywide Home Loans, Citibank Mortgage, Florence Savings Bank, United Cooperative Bank, and Charter One Bank.

Economic growth in Springfield trailed the rest of the state. Employment and income growth have been low because of the loss of manufacturing jobs during the recession in the early 1990's. In addition, universities and colleges have been major employers in the area, most of which fell in the low to moderate pay scale. The low labor growth rate coupled with a shortage of skilled workers will continue to be a major impediment to economic growth in this area. The seasonally unadjusted unemployment rate is 2.4% as of December 2000 and slightly above the state rate of 2%.

Housing market activity ended the year on a weak note. The decline in activity will adversely affect construction employment

over the near term. Springfield is one of the most affordable areas relative to the rest of Massachusetts. Between 1990 and 1999, the median sales price of an existing home fell by 6%, whereas new home sales prices increased 18.3%. Owner-occupied units in the Springfield MSA represented 57% of all housing units in the area in 1990. Only 7.8% of those units were located in low-or moderate-income tracts.

As part of the evaluation, we reviewed seven recently completed community contacts conducted. Community contacts have identified micro business loans and affordable housing as primary credit needs.

Worcester MA MSA (#9240)

Demographic Information for Full Scope Area: Worcester MA MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	111	5.41	16.22	59.46	17.12	1.80
Population by Geography	478,742	4.48	15.14	62.16	17.87	0.35
Owner-Occupied Housing by Geography	106,871	0.71	7.63	69.34	22.33	0.00
Business by Geography	20,140	9.18	12.69	58.06	19.94	0.13
Farms by Geography	537	0.56	3.54	70.02	25.70	0.19
Family Distribution by Income Level	125,047	18.84	17.66	25.47	38.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	45,632	7.90	21.37	60.68	10.05	0.00
Median Family Income		42,180	Median Housing Value	136,654		
HUD Adjusted Median Family Income for 2000		54,342	Unemployment Rate (Dec 2000	2.0%		
Households Below Poverty Level		9.17%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Worcester assessment area includes the entire metropolitan area and is located in the south central portion of Massachusetts. It comprises much of Worcester County and anchored by the city of Worcester, the second largest in the Commonwealth. Worcester is within 40 miles of Boston.

Fleet is the leading depository institution in the Worcester area in both deposit market share at 41.5% as of June 30, 2000 and branch presence with 25, two of which are First Community branches. This assessment area holds 2.21% of the bank's total deposits, and 2.4% of the HMDA loans, 2.58% of small business loans, and 3.35% consumer loans. As part of the Fleet and BankBoston integration process, five branches were divested to Sovereign Bancorp. Fleet also has 82 ATMs within the assessment area. Deposit competitors are small local institutions including First Massachusetts Bank, NA, Commerce Bank & Trust Co., Flagship Bank & Trust Co., and Webster Five Cents Savings Bank. Some of the major lending competitors include First Massachusetts

Bank, Capital One, American Express Centurion Bank, Norwest Mortgage, Countrywide Home Loans, Ohio Savings Bank, and the Millbury Credit Union.

Worcester was a center for textile manufacturing. However, the economy diversified over the years, largely due to the biotechnology industry. The area has also grown into a major research and academic center, with over eight colleges, including Holy Cross and a state medical school. Positive economic trends across the state coupled with growth in the services, retail and biotechnology industries in Worcester have stimulated the demand for labor and driven down the unemployment rate. The unemployment rate decreased from 9.8% in 1991 to 2% in December 2000, comparable to the state and well below the national rate.

Continued growth in the Worcester area has put pressure on housing prices and affordability. After a decline in the mid 1990's, housing prices began to rise, although median home sales price of \$110,500 in 1999 was still 3.8% lower than in 1990. Deterioration of inner-city housing and rising housing costs in the suburbs have impacted the availability of good quality, affordable housing stock, particularly for low- and moderate-income individuals.

Several community contacts have identified various credit needs including affordable home loans with flexible underwriting, home improvement and small business loans. Fleet has been active in a number of CD initiatives in Worcester, including the Greater Worcester Business Information Center, the Worcester Community Housing Resources and the Working Capital Program. The bank participated in tax credit and affordable housing projects through its participation in the Massachusetts Housing Equity Fund and its sister organization, MHIC, the Massachusetts Housing Investment Corporation.

State of New Hampshire Full Scope Area

Nashua NH MSA (#5350)

Demographic Information for Full Scope Area: Nashua NH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.00	18.75	62.50	18.75	0.00
Population by Geography	171,107	0.00	15.35	64.41	20.24	0.00
Owner-Occupied Housing by Geography	42,715	0.00	9.43	66.32	24.25	0.00
Business by Geography	8,852	0.00	17.83	60.75	21.42	0.00
Farms by Geography	253	0.00	9.88	64.43	25.69	0.00
Family Distribution by Income Level	46,310	14.97	19.25	29.62	36.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,849	0.00	25.61	63.03	11.36	0.00
Median Family Income	49,951	Median Housing Value		139,836		
HUD Adjusted Median Family Income for 2000	64,100	Unemployment Rate (Dec 2000		2.1%		
Households Below Poverty Level	5.18%	US Census not seasonally adjusted)				

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

Source: 1990 US Census and 2000 HUD updated MFI

The Nashua assessment area is located in Southern New Hampshire, comprised of Hillsborough County and the central city of Nashua, and includes the entire MSA. The city of Nashua is the second largest city in New Hampshire and is a major commercial and retail center. The area is predominantly comprised of middle-income tracts with no low-income tracts. As of June 30, 2000, Fleet ranked first in deposit market share with 38%, ahead of several large institutions including Bank of New Hampshire, Citizens Bank, and Keybank. This MSA holds .6% of the bank's total deposits, and .74% of the HMDA loans, 1.35% of small business loans, and 1% consumer loans. Fleet has 8 branches and 24 ATMs in the assessment area. Major lending competitors include Bank of America, MBNA, American Express Centurion Bank, Citizens Bank New Hampshire, Countrywide Home Loans, Norwest Mortgage, and Bank of New Hampshire.

The Nashua economy has expanded over the last ten years due to employment and income growth in the manufacturing, retail trade and services sectors. In addition, manufacturers including Compaq Computer and Lockheed Sanders continued to add a number of jobs to the area. A 28% rise in the median family income over the last decade was reflective of the strength of the Nashua economy. The seasonally unadjusted unemployment rate of 2.1% as of December 2000 is comparable to the state average, but well below the national average.

Due to the close proximity to the Boston area and the low state tax burden, many commuters have migrated from the Boston area and

have contributed to the 8.9% population growth in the area over the last decade, with the most significant growth coming from the over 65 age group. The population trend has also increased demand for housing and has led to double-digit growth in housing prices. In addition, Nashua has benefited from its access to the recently expanded Manchester Airport, the largest commercial airport in the region. Although Nashua is still considered more affordable than the Boston metro area, it has become more affluent over the last decade as evidenced by the 28% growth in median income.

Downtown areas of Nashua are in need of revitalization, specifically in the location adjacent to the river where old textile mill shells remain.

As part of the evaluation, we reviewed five recently completed community contacts conducted. Community contacts have defined primary credit needs as loans to support affordable housing purchase and repair.

State of New Jersey Full Scope Areas

Middlesex-Somerset NJ MSA (#5015)

Demographic Information for Full Scope Area: Middlesex-Somerset NJ MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	258	1.94	15.12	60.08	20.93	1.94
Population by Geography	1,019,835	1.53	14.13	61.52	22.48	0.34
Owner-Occupied Housing by Geography	258,237	0.55	9.24	63.87	26.34	0.00
Business by Geography	51,138	2.39	10.25	62.30	25.05	0.01
Farms by Geography	1,355	0.44	4.50	61.33	33.73	0.00
Family Distribution by Income Level	272,942	15.60	19.79	27.19	37.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	96,600	2.77	22.55	62.30	12.38	0.00
Median Family Income		55,147	Median Housing Value		179,410	
HUD Adjusted Median Family Income for 2000		80,800	Unemployment Rate (Dec 2000		2.3%	
Households Below Poverty Level		4.48%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The bank's assessment area in the Middlesex-Somerset MSA consists of the entire MSA. The assessment area is in Hunterdon, Middlesex, and Somerset counties. As of June 30, 2000 Fleet had 5% of the deposits in the metropolitan statistical area. Fleet was ranked fifth behind two New Jersey-headquartered banks, one of which consists of the deposits of a bank associated with a worldwide financial management and advisory company, and two large multistate banks, one headquartered in Pennsylvania and one in North Carolina. Three percent of the bank's deposits are located within the MSA.

Thirty-two, or 18% of the bank's total branches in the state, are located in the MSA. All branches have ATMs.

Major cities in the MSA include Perth-Amboy, New Brunswick and South Amboy. Major employers include AT&T, Johnson & Johnson, Merrill Lynch, and Bristol-Meyers Squibb. The primary sectors of employment are services (32%), retail trade (15%), and manufacturing (14%). Leading industries are personnel supply services, telephone communications, offices and clinics of medical doctors, and computer and data processing.

The economy in the assessment area has slowed substantially over the past six months, mirroring the nationwide deceleration. The slowdown has been broad based, with decreases in services and financial services hiring, and declines in manufacturing, transportation, communications, and utilities. While the slower pace of job creation has helped alleviate some of the pressure on

the labor market, the economy is anticipated to remain sufficiently tight to withstand a moderate weakening of economic conditions. The general economic outlook for the MSA is mixed. The slowing national economy, as well as uncertainty in the telecommunications and financial services industry, may limit near-term growth. Nevertheless, the MSA has consistently maintained one of the strongest economies in the state of New Jersey. Corporate headquarters continue to relocate to the western part of the assessment area, complimenting its high tech research and services. The concentration of telecommunications and pharmaceutical firms has kept migration positive and incomes high. The proximity to New York and Philadelphia, good quality of life, and high productivity of its industries provide good long-term potential.

Affordable housing is a need as house price appreciation has increased dramatically in the MSA. Existing home prices in the metro area are advancing at a double-digit pace. The pace of new construction will not be sufficient to meet demand in the tightest markets, and upward pressure on existing home prices will remain high. In addition to affordable housing, affordable housing that is reserved for the elderly and supportive services for the elderly, including senior centers, have been identified as a high priority needs. Affordable housing for renter households is also needed.

Competition is strong. The bank's major competitors include nationwide mortgage and business lenders, large regional banks, and numerous community banks.

We reviewed seven recently completed community contacts with local community development organizations. The organizations are involved in affordable housing, economic and community development, and small business development. The most pressing needs identified include interest rate subsidies for low- and moderate-income borrowers, greater participation in affordable housing and community development projects, small business lending, as well as grants.

Newark NJ MSA (#5640)

Demographic Information for Full Scope Area: Newark NJ MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	483	12.84	22.57	36.44	25.05	3.11
Population by Geography	1,915,928	8.71	21.48	39.20	30.57	0.04
Owner-Occupied Housing by Geography	409,163	1.98	11.73	44.58	41.71	0.00
Business by Geography	92,564	6.80	12.95	41.93	38.28	0.03
Farms by Geography	2,068	0.53	3.97	51.35	44.15	0.00
Family Distribution by Income Level	500,112	20.05	17.75	23.61	38.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	189,013	15.85	32.71	36.99	14.44	0.00
Median Family Income		50,047	Median Housing Value	174,740		
HUD Adjusted Median Family Income for 2000		70,600	Unemployment Rate (Dec 2000	3.3%		
Households Below Poverty Level		8.85%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The bank's Newark assessment area consists of the entire MSA. The assessment area is in Essex, Morris, Sussex, Union, and Warren counties. As of June 30, 2000, Fleet had 3% of the deposits in the MSA. Fleet was ranked ninth behind four New Jersey-headquartered banks, and four large multistate banks, two headquartered in Pennsylvania, one in New York, and one in North Carolina. Two percent of the bank's deposits are located within the MSA.

Twenty-seven, or 15% of the bank's total branches in the state, are located in the MSA. All branches have ATMs.

Competition is strong. The bank's major competitors include nationwide mortgage and business lenders, large regional banks, and numerous community banks.

Major cities in the MSA include Newark, East Orange, Elizabeth, Linden, Rahway, Summit and Plainfield. Major employers include Lucent Technologies, Continental Airlines, Prudential Insurance of America, Merck & Co., Federal Express, AT&T, Schering-Plough Corporation, and United Parcel Service. The primary sectors of employment are services (32%), government (14%) and manufacturing (14%). Leading industries are hospitals, pharmaceuticals, computer and data processing, miscellaneous business services, professional and commercial equipment, telephone communications, and trucking and courier services.

The economy in the Newark metro area is advancing at a healthy pace, with labor markets tightening. The future of the Port of

Newark is bright and activity is expected to maintain solid growth. The market for industrial space in the Newark MSA is strong. Growth is being driven by the expansion of the trucking and warehousing industry, as well as increased international trade associated business due to the growth of importance of the Port of Newark at Elizabeth and Newark International Airport. However, uncertainty is mounting in the telecommunications industry, with negative effects for some of the metro area's largest employers. Newark faces some uncertainty in the short term related to its dominant telecommunications, pharmaceutical and health-care employers as well as to an economic slowdown.

Affordable housing is a need as house price appreciation in the Newark area skyrockets. The median housing price is growing at a double-digit pace. Household formation has been growing at a significantly faster rate than residential permitting, resulting in excess demand in the market. The median existing home price has increased to more than \$245 thousand, and housing affordability in the metropolitan area has eroded. In addition to more affordable housing, resources for home improvement are needed.

We reviewed five recently completed community contacts with local community development organizations. These organizations are involved in affordable housing and economic and community development. The most pressing needs identified at these meetings were for community development financing.

State of New York Full-Scope Areas

Albany NY MSA (#0160)

Demographic Information for Full Scope Area: Albany NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	240	3.33	22.50	54.17	18.33	1.67
Population by Geography	953,303	2.85	18.83	56.04	22.09	0.18
Owner-Occupied Housing by Geography	235,992	0.88	15.25	59.44	24.44	0.00
Business by Geography	39,836	6.29	16.88	52.67	23.92	0.24
Farms by Geography	1,574	0.25	23.25	58.13	18.36	0.00
Family Distribution by Income Level	247,172	17.71	18.97	25.51	37.81	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	90,659	4.76	28.43	55.54	11.27	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below Poverty Level		38,726 50,309 9.25%	Median Housing Value Unemployment Rate (Dec 2000 US Census not seasonally adjusted)	93,242 3.1%		

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

Source: 1990 US Census and 2000 HUD updated MFI

The Albany assessment area is located in the eastern portion of the Upstate New York region on the Massachusetts border. It includes the entire Albany-Schenectady MSA and Fulton county and a portion of the Glen Falls MSA. Fleet ranked first in market share of deposits at 16% (based on June 30, 2000 FDIC Deposit Market Share Reports). However, in terms of number of branches, two other competitors had a greater branch presence when compared to Fleet's 42 branches. This MSA contains 2.19% of the bank's total deposits. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 1.98%, small business loans are 2.57%, and consumer loans are 1.65%.

Major mortgage competitors include Charter One Bank, HSBC Mortgage & Bank, and SEFCU. In the small business area, Fleet competes with American Express Centurion Bank, Capital One, F.S.B., and Keybank, NA

The growth of the area labor force was weak which hindered general economic vitality. However, the economy has remained strong and the unemployment rate (not seasonally adjusted) of the MSA has declined to 3.1% of as December 2000. In addition, the median income for the area grew by 29.9% over the last ten years to \$50,309 in 2000. The economy of Albany has been substantially dependent on the State Government, which employs about 50,000 people and on General Electric with 9,000 employees. Health care and financial service companies have also been among the other top employers.

The population grew slightly by 0.9% in the 1990s. The Albany assessment area had 8 low-income tracts, which were located in the cities of Troy, Albany, and Schenectady. Approximately 2.3% of households and 1.5% of families were located in these areas. The area also had 54 moderate-income tracts, which contained approximately 18.6% of households and 16.8% of families. Over the last ten years, the number of households and families in low-income tracts declined dramatically, by 24.1% and 33.8%, respectively.

The assessment area includes the City of Albany, but the city accounted for only one tenth of the total population in 1990. The city contained a significant concentration of poverty, with a 1990 poverty rate of 18.3% of households. Homeownership rate in the City of Albany was very low (38%) compared to the MSA homeownership rate of approximately 58.5%. Housing prices for existing homes have been decreasing in the Albany area where supply generally exceeds demand. However, the median new home price increased during the past few years and was approximately double that of the median existing home price in 1999.

As part of the evaluation, we considered information from three community contacts involved in community development and affordable housing. Identified needs are affordable first time homebuyer programs, small dollar amount home improvement loans, matching funds for Individual Development Accounts and inexpensive used car loans. Opportunities also exist for construction and rehab lending opportunities, as well as the need for technical assistance.

Nassau-Suffolk NY MSA (#5380)

Demographic Information for Full Scope Area: Nassau-Suffolk NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	582	0.52	13.57	66.15	18.04	1.72
Population by Geography	2,609,212	0.37	14.57	67.46	17.28	0.31
Owner-Occupied Housing by Geography	687,506	0.04	11.81	68.73	19.42	0.00
Business by Geography	139,446	0.15	14.26	65.49	20.07	0.02
Farms by Geography	3,578	0.00	18.70	66.10	15.15	0.06
Family Distribution by Income Level	690,401	16.36	19.26	26.30	38.08	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	245,967	0.15	21.59	68.64	9.61	0.00
Median Family Income		56,726	Median Housing Value		206,598	
HUD Adjusted Median Family Income for 2000		76,500	Unemployment Rate (Dec 2000		2.6%	
Households Below Poverty Level		4.55%	US Census not seasonally adjusted)			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2000 HUD updated MFI

The Nassau Suffolk MSA consists of Nassau and Suffolk Counties in New York and is commonly known as Long Island. Fleet ranked seventh in deposit market share at 7.6% (based on June 30, 2000 FDIC Deposit Market Share Reports), with 88 branches. This MSA contains 4.7% of the bank's total deposits. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 11.18%, small business loans are 6.92%, and consumer loans are 5.64%.

Major mortgage competitors include Chase Manhattan and First Union. In the small business area, Fleet competes with American Express Centurion Bank, Capitol One, F.S.B., and Chase Manhattan Bank.

The economy has expanded significantly, due to the area's close proximity to New York City, the impact of a buoyant stock market, and the diversification of the local economy into the fast growing software, biotech and financial services industries. North Shore-Long Island Jewish Health Systems is the major employer. The unemployment rate (not seasonally adjusted) was 2.6% in December 2000. Median family income has increased by almost 35 percent since 1990, reaching \$76,500 in 2000. The population has been growing steadily, but there has been significant growth in the "persons over 65" segment.

There are only three low-income tracts dispersed throughout the MSA. The moderate-income tracts in Nassau County are also scattered throughout the county and, in Suffolk, they are concentrated in the eastern half, where the population is also less dense. The number of low-income families declined by 7.7% between 1990 and 1999, while the number of moderate-income families increased 5.7% over the same period. Only 0.04 % of owner occupied units were located in low-income tracts and 11.8% were in moderate-income tracts. A large number of low-and moderate-income individuals and families have faced affordability issues caused by the high ownership and rental costs in the area, and a relatively high cost-of-living.

As part of the evaluation, we considered information from four community contacts involved in community and business development and affordable housing. Identified needs are affordable housing, affordable day care, and various loan types to assist small businesses. Opportunities also exist for participation in the SBA's 504 Loan Program and financing of community development projects.

New York City NY MSA (#5600)

Demographic Information for Full Scope Area: New York City NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,497	12.66	17.54	32.76	34.24	2.80
Population by Geography	8,546,846	14.32	20.00	29.69	35.62	0.38
Owner-Occupied Housing by Geography	1,084,100	2.00	7.82	29.17	61.00	0.01
Business by Geography	351,206	6.97	15.77	22.84	51.94	2.47
Farms by Geography	2,402	1.50	4.54	17.74	75.90	0.33
Family Distribution by Income Level	2,074,817	24.98	15.22	18.24	41.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	834,046	26.16	28.99	28.97	15.88	0.00
Median Family Income		37,515	Median Housing Value		194,647	
HUD Adjusted Median Family Income for 2000		56,200	Unemployment Rate (Dec 2000		4.8%	
Households Below Poverty Level		16.28%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The New York MSA includes the five boroughs of Manhattan, Queens, Brooklyn, Bronx, and Staten Island, as well as Westchester County, Rockland County, and Putnam County. Fleet ranked 14th in deposit market share at 1.33% (based on June 30, 2000 FDIC Deposit Market Share Reports), with 77 branches. Chase Manhattan Bank and Citibank have a combined deposit market share of 44.7% and significantly more branches than any other institutions, with Chase's 272 branches and Citibank's 139 branches. This MSA contains 4.4% of the bank's total deposits. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 8.52%, small business loans are 7.75%, and consumer loans are 8.29%.

The New York MSA is home to many large and diversified financial service companies, contributing to a fiercely competitive market for all types of products. Major mortgage competitors include Chase Manhattan and Citibank/Citicorp Mortgage. In the small business area, Fleet competes with American Express Centurion Bank, The Chase Manhattan Bank, and Capitol One, FSB

The overall economy for the MSA continues to grow. Wall Street is an important economic driver supporting solid job growth, vigorous consumer spending and active real estate markets. More recently, the area's economy has shown signs of slower growth as tourism slows, consumer demand eases, and housing prices stabilize as sales decline. Although job growth has slowed to the national average, the labor markets remain very tight.

The computer and business services industries also are important and help the region diversify. The media industry, comprised of computer-related companies, is a new growth industry for the area

and has a tight labor market. The top three employment sectors include Services; Government; and Finance, Insurance and Real Estate, and combined employ over 66% of the workforce. The major employers are Chase Manhattan Corporation, Citigroup Inc., and Verizon Communications. The unemployment rate (not seasonally adjusted) was 4.8% in December 2000.

The MSA has shown steady population growth over the past decade, with overall growth of 2.1%. The median family income was \$56,200 in 2000, nearly a 50% increase from 1990. Highly skilled and paid workers are attracted to the area's major national and international companies. The influx of these workers, along with strong stock market, has contributed to the area's high per capita income.

The substantial majority, 80% of the MSA population, as well as the substantial majority of the MSAs low- and moderate-income tracts is concentrated within the five boroughs of New York City.

The New York MSA is a very high cost area. Homeownership is not generally affordable without subsidy even for individuals earning more than 80 percent of the area median income. From 1990 to 1999, while there has been a decrease in the number of low-income families and households, moderate-income families have increased by 7.4% and households by 18%. A high portion, 16.3% of households remain below the poverty level. Only 2% of owner-occupied units are located in low-income tracts, and 7.8% are located in moderate-income tracts.

As part of the evaluation, we met with several community groups involved in housing, community and/or economic development. Identified needs include affordable housing, multifamily loans, micro loans, Section 42 tax credits, and banking accounts. Consumer service needs identified includes managing personal finance technical assistance and how to save and other self-help programs. Business service needs include technical assistance for small business owners, partnership with community groups that assist small businesses via referral program and technical assistance, and financial service centers. Also needed are more branches and ATMs.

Syracuse NY MSA (#8160)

Demographic Information for Full Scope Area: Syracuse NY MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	192	8.85	15.63	53.13	21.35	1.04
Population by Geography	673,057	6.51	13.83	56.02	23.31	0.33
Owner-Occupied Housing by Geography	164,528	1.37	9.24	61.93	27.46	0.00
Business by Geography	27,672	7.79	13.34	55.03	23.79	0.05
Farms by Geography	1,194	0.42	5.19	72.95	21.44	0.00
Family Distribution by Income Level	171,378	18.48	18.00	24.65	38.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	62,524	9.06	20.20	57.36	13.38	0.00
Median Family Income		36,672	Median Housing Value	73,066		
HUD Adjusted Median Family Income for 2000		47,000	Unemployment Rate (Dec 2000	4.3%		
Households Below Poverty Level		10.8%	US Census not seasonally adjusted)			

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

Source: 1990 US Census and 2000 HUD updated MFI

The Syracuse assessment area is located in the center of Upstate New York and includes Cayuga, Oswego and Onondago counties. Fleet ranked fourth in market share of deposits at 11% (based on June 30, 2000 FDIC Deposit Market Share Reports), and it had the third highest number of branches with 23 branch locations. This MSA contains 0.88% of the bank's total deposits. As a percentage of the bank's total loan originations in this assessment area, home mortgages comprise 1.25%, small business loans are 1.35%, and consumer loans are 1.01%.

Fleet's main competitors included Manufacturers and Traders Trust Company, HSBC Bank USA, Keybank NA, and Chase Manhattan Bank. Community banks were also strong competitors in this market, and generally perceived by community groups as more responsive to community needs.

The area enjoyed reasonably strong economic growth, particularly evident in the services and construction industries. The unemployment rate (not seasonally adjusted) was 4.3% in December 2000. Major employers include SUNY Upstate University, Syracuse University and Carrier Corporation. Employment was also concentrated in the auto parts and defense industries. While the economy in the late 1990's was strong, the concentration in old-line manufacturing industries is not favorable for long-term economic growth.

Syracuse is the central city of this area, with the 17 low-income census tracts located here. Many of the moderate-income tracts are also located in the City of Syracuse, however, some moderate-income tracts were scattered throughout the assessment area. From 1990 to 1999, there was an estimated decrease of 1,000

households and about 800 families in low-income tracts. Moderate-income tracts also experienced a declining trend, with an estimated decrease of about 6,000 households and 4,000 families from 1990 to 1999. Housing was generally affordable, yet homeownership remained a challenge among low-income borrowers. Depressed housing values and low-paying jobs were among deterrents.

An identified need was rehabilitating the large volume of substandard housing, particularly in low-income neighborhoods where almost 50% of the housing units were considered substandard. In some areas in the City of Syracuse, an estimated 75-80% of the houses needed rehabilitation. A total of eight community contacts were made. Community groups have identified purchase/rehabilitation, home improvement, new construction, and flexible programs as credit/ banking needs.

Appendix D: Tables of Performance Data

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Tables of Performance Data

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Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables.

References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated 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 MSA/assessment area.

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

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area. The Other Products Table presents the number and dollar amount of optional products.

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 - See Table 2.

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.

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.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Home Mortgage 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.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that

are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the call reports as an off-balance-sheet item.

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

Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATE MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area (2000):	% 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:												
Boston, MA-NH MSA AA	100.00	28,535	3,494,359	10,752	810,789	0	0	76	601,823	39,363	4,906,971	100.00
Lawrence, MA-NH MSA AA	100.00	4,061	377,801	913	69,392	0	0	5	19,052	4,979	466,245	100.00
New London-Norwich CT-RI	100.00	2,506	220,356	616	41,957	0	0	2	4,074	3,124	266,387	100.00
Portsmouth, ME-NH MSA AA	100.00	1,809	143,539	601	50,502	0	0	3	1,818	2,413	195,859	100.00
Providence-Fall River RI-	100.00	10,698	950,848	4,326	399,746	0	0	30	35,949	15,054	1,705,543	100.00

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: MULTISTATE MSA														
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000														
MA/Assessment Area (2000):	% of Rated Area Loans (#) in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Boston, MA-NH MSA AA	100.00	17,776	1,081,784	3,218	34,494	0	0	2,485	16,451	153,425	451,928	176,904	1,584,657	100.00
Lawrence, MA-NH MSA AA	100.00	1,527	78,778	438	4,124	0	0	512	2,894	11,713	38,972	14,190	124,768	100.00
New London-Norwich CT-RI	100.00	422	30,104	163	1,577	0	0	287	1,980	4,541	20,734	5,413	54,395	100.00
Portsmouth, ME-NH MSA AA	100.00	315	18,771	168	1,612	0	0	243	1,743	3,729	15,529	4,455	37,655	100.00
Providence-Fall River RI-MA	100.00	4,277	195,936	747	7,048	0	0	2,089	12,016	45,943	215,816	53,056	430,816	100.00

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Institution ID: 200-Fleet National Bank

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:															
Boston, MA-NH MSA AA	8,149	100.00	0.88	4.48	12.69	28.83	55.29	45.83	31.14	20.85	4.93	12.35	9.63	4.18	3.32
Lawrence, MA-NH MSA AA	1,340	100.00	1.68	11.19	8.50	29.93	69.27	49.25	20.54	9.63	5.44	19.63	18.28	3.66	2.16
New London-Norwich CT-RI AA	621	100.00	0.29	0.32	11.63	13.85	62.61	59.26	25.47	26.57	3.35	7.14	2.95	3.21	3.72
Portsmouth, ME-NH MSA AA	257	100.00	0.00	0.00	4.94	4.28	83.37	85.60	11.68	10.12	1.17	0.00	1.07	1.19	1.10
Providence-Fall River RI-MA AA	3,304	100.00	0.63	1.45	9.64	12.38	65.70	59.05	24.03	27.12	7.06	14.60	10.03	6.80	6.20

* Based on 1999 Aggregate HMDA Data Only.

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

Institution ID: 200-Fleet National Bank

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE MSA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Boston, MA-NH MSA AA	5,884	100.00	0.88	1.53	12.69	12.76	55.29	47.82	31.14	37.87	27.58	37.27	24.92	23.42	38.34	
Lawrence, MA-NH MSA AA	758	100.00	1.68	2.51	8.50	9.10	69.27	62.66	20.54	25.73	30.50	35.29	31.43	27.30	42.68	
New London-Norwich CT-RI	500	100.00	0.29	0.00	11.63	9.80	62.61	52.40	25.47	37.80	9.14	0.00	9.47	7.32	13.30	
Portsmouth, ME-NH MSA AA	481	100.00	0.00	0.00	4.94	2.08	83.37	87.73	11.68	10.19	17.88	0.00	5.41	18.56	15.79	
Providence-Fall River RI-MA	1,859	100.00	0.63	0.32	9.64	6.19	65.70	55.68	24.03	37.82	15.58	3.70	10.80	13.57	21.79	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MULTISTATE MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Boston, MA-NH MSA AA	14,484	100.00	0.88	1.22	12.69	12.31	55.29	51.95	31.14	34.52	6.14	7.06	6.31	6.00	6.26	
Lawrence, MA-NH MSA AA	1,958	100.00	1.68	1.02	8.50	6.03	69.27	68.95	20.54	24.00	6.44	5.00	5.98	6.66	6.05	
New London-Norwich CT-RI	1,385	100.00	0.29	0.14	11.63	6.93	62.61	59.57	25.47	33.36	9.14	0.00	6.94	8.97	10.29	
Portsmouth, ME-NH MSA AA	1,071	100.00	0.00	0.00	4.94	3.17	83.37	83.10	11.68	13.73	6.89	0.00	4.50	7.02	6.83	
Providence-Fall River RI-MA	5,531	100.00	0.63	0.42	9.64	5.77	65.70	58.67	24.03	35.15	7.77	5.49	6.03	7.25	9.58	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE MSA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Providence-Fall River RI-MA	4	100.00	0.63	25.00	9.64	50.00	65.70	25.00	24.03	0.00	1.44	16.67	2.15	0.00	0.00	
Portsmouth, ME-NH MSA AA	0	100.00	0.00	0.00	4.94	0.00	83.37	0.00	11.68	0.00	0.00	0.00	0.00	0.00	0.00	
New London-Norwich CT-RI	0	100.00	0.29	0.00	11.63	0.00	62.61	0.00	25.47	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence, MA-NH MSA AA	5	100.00	1.68	100.00	8.50	0.00	69.27	0.00	20.54	0.00	5.15	19.23	0.00	0.00	0.00	
Boston, MA-NH MSA AA	18	100.00	0.88	16.67	12.69	50.00	55.29	27.78	31.14	5.56	1.99	5.36	2.47	1.35	0.87	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: MULTISTATE MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Boston, MA-NH MSA AA	10,752	100.00	6.08	7.55	15.03	17.44	47.46	42.44	31.42	32.56	14.97	21.02	16.43	13.30	16.26					
Lawrence, MA-NH MSA AA	913	100.00	9.52	7.78	8.62	7.34	64.13	65.61	17.72	19.28	12.00	13.78	14.34	11.56	12.40					
New London-Norwich CT-RI	616	100.00	3.18	4.38	15.22	13.47	54.91	54.06	26.69	28.08	5.92	11.39	4.84	5.68	6.73					
Portsmouth, ME-NH MSA AA	601	100.00	0.00	0.00	8.40	7.15	78.99	81.03	12.61	11.81	4.93	0.00	6.16	5.29	3.09					
Providence-Fall River RI-MA	4,326	100.00	4.47	5.22	15.17	16.81	61.22	56.20	19.13	21.78	17.84	25.59	21.07	16.48	18.26					

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: MULTISTATE MSA															
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston, MA-NH MSA AA	0	0.00	1.18	0.00	9.61	0.00	53.96	0.00	35.21	0.00	0.00	0.00	0.00	0.00	0.00
Lawrence, MA-NH MSA AA	0	0.00	1.10	0.00	3.56	0.00	70.14	0.00	25.21	0.00	0.00	0.00	0.00	0.00	0.00
New London-Norwich CT-RI	0	0.00	0.21	0.00	6.65	0.00	62.99	0.00	30.15	0.00	0.00	0.00	0.00	0.00	0.00
Portsmouth, ME-NH MSA AA	0	0.00	0.00	0.00	3.57	0.00	76.53	0.00	19.90	0.00	0.00	0.00	0.00	0.00	0.00
Providence-Fall River RI-MA AA	0	0.00	0.39	0.00	6.51	0.00	66.90	0.00	26.20	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATE MSA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Boston, MA-NH MSA AA	8,149	59.61	19.30	12.62	18.07	33.06	24.04	25.19	38.59	29.13	4.78	11.28	8.53	4.54	2.69	
Lawrence, MA-NH MSA AA	1,340	9.80	20.08	18.25	16.91	35.99	25.67	27.85	37.34	17.91	5.99	17.31	10.21	5.32	2.31	
New London-Norwich CT-RI	621	4.54	16.55	7.23	19.74	23.69	26.50	29.11	37.21	39.96	3.45	4.23	3.38	3.07	3.65	
Portsmouth, ME-NH MSA AA	257	1.88	15.98	4.52	20.20	11.76	27.73	26.70	36.10	57.01	1.24	0.88	0.94	1.20	1.40	
Providence-Fall River RI-MA	3,304	24.17	19.25	7.39	17.88	25.91	25.31	26.13	37.56	40.58	7.55	13.61	11.55	6.43	5.96	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 18.95% 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: MULTISTATE MSA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Boston, MA-NH MSA AA	5,884	100.00	19.30	7.52	18.07	17.37	24.04	23.87	38.59	51.24	20.23	21.94	18.10	15.81	24.50	
Lawrence, MA-NH MSA AA	758	100.00	20.08	8.35	16.91	17.91	25.67	23.65	37.34	50.09	23.68	35.94	25.00	17.28	25.61	
New London-Norwich CT-RI	500	100.00	16.55	9.31	19.74	19.95	26.50	22.07	37.21	48.67	6.79	10.64	6.64	6.23	6.72	
Portsmouth, ME-NH MSA AA	481	100.00	15.98	6.69	20.20	12.81	27.73	25.91	36.10	54.60	13.23	8.86	9.09	11.39	16.46	
Providence-Fall River RI-MA	1,859	100.00	19.25	7.99	17.88	16.46	25.31	25.47	37.56	50.07	12.32	14.69	12.47	10.95	12.73	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 25.20% 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: MULTISTATE MSA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Boston, MA-NH MSA AA	14,484	100.00	19.30	5.53	18.07	18.36	24.04	28.00	38.59	48.11	4.23	5.05	4.41	4.16	4.11	
Lawrence, MA-NH MSA AA	1,958	100.00	20.08	5.92	16.91	19.85	25.67	27.15	37.34	47.08	4.90	5.69	5.86	4.74	4.54	
New London-Norwich CT-RI	1,385	100.00	16.55	5.55	19.74	16.77	26.50	26.78	37.21	50.90	7.14	7.02	6.28	6.66	7.82	
Portsmouth, ME-NH MSA AA	1,071	100.00	15.98	5.49	20.20	11.62	27.73	24.33	36.10	58.56	4.77	5.59	4.28	3.99	5.23	
Providence-Fall River RI-MA	5,531	100.00	19.25	5.36	17.88	14.75	25.31	26.93	37.56	52.96	6.18	7.34	6.56	5.57	6.29	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 40.00% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATE MSA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Boston, MA-NH MSA AA	10,752	62.48	83.68	50.34	84.79	7.90	7.31	14.97	3.47
Lawrence, MA-NH MSA AA	913	5.31	83.82	56.85	83.79	9.42	6.79	12.00	5.46
New London-Norwich CT-RI	616	3.58	86.55	75.00	88.64	6.17	5.19	5.92	6.29
Portsmouth, ME-NH MSA AA	601	3.49	84.34	71.05	83.86	9.32	6.82	4.93	5.58
Providence-Fall River RI-MA	4,326	25.14	85.31	61.23	80.12	11.03	8.85	17.84	8.62

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 20.30% 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: MULTISTATE MSA									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Boston, MA-NH MSA AA	0	0.00	89.65	0.00	0.00	0.00	0.00	0.00	0.00
Lawrence, MA-NH MSA AA	0	0.00	89.04	0.00	0.00	0.00	0.00	0.00	0.00
New London-Norwich CT-RI	0	0.00	92.10	0.00	0.00	0.00	0.00	0.00	0.00
Portsmouth, ME-NH MSA AA	0	0.00	89.54	0.00	0.00	0.00	0.00	0.00	0.00
Providence-Fall River RI-MA MSA	0	0.00	92.71	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: MULTISTATE MSA										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total *	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Boston, MA-NH MSA AA	176,904	100.00	3.93	4.91	20.92	22.05	51.55	44.47	23.59	28.56	24.09	29.92	15.91	25.62	19.51	17.00	40.49	27.45	
Lawrence, MA-NH MSA AA	14,190	100.00	7.41	5.58	15.13	11.99	62.59	61.06	14.87	21.35	24.04	29.75	15.56	22.90	20.58	19.31	39.83	28.04	
New London-Norwich CT-RI MSA	5,413	100.00	1.54	1.46	20.01	15.33	57.77	59.75	20.68	23.46	20.66	20.82	17.99	30.65	22.53	28.56	38.82	19.98	
Portsmouth, ME-NH MSA AA	4,455	100.00	0.00	0.00	8.51	4.62	81.52	85.01	9.96	10.37	20.36	15.48	18.06	31.99	23.21	26.00	38.37	26.53	
Providence-Fall River RI-MA MSA	53,056	100.00	2.25	2.35	19.88	16.00	59.86	56.53	18.01	25.12	24.84	27.83	15.18	24.48	19.56	21.42	40.42	26.27	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MULTISTATE MSA									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Boston, MA-NH MSA AA	29	70,756	381	453,802	388	151,675	100	0	0
Lawrence, MA-NH MSA AA	0	0	24	17,103	24	17,103	100	0	0
New London-Norwich CT-RI	0	0	22	8,478	22	8,478	100	0	0
Portsmouth, ME-NH MSA AA	1	3,850	6	2,250	7	6,100	100	0	0
Providence-Fall River RI-MA	6	7,026	115	28,340	121	35,366	100	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: MULTISTATE MSA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:																	
Boston, MA-NH MSA AA	100.00	200	100.00	6.00	16.00	42.50	35.50	4	6	-1	-3	+2	0	3.94	20.39	51.02	24.56
Lawrence, MA-NH MSA AA	100.00	17	100.00	11.76	5.88	70.59	11.76	1	0	0	0	+1	0	7.59	15.35	60.84	16.21
New London-Norwich CT-RI	100.00	21	100.00	9.52	14.29	42.86	33.33	0	2	0	0	-2	0	1.30	19.23	57.91	20.39
Portsmouth, ME-NH MSA AA	100.00	12	100.00	0.00	8.33	91.67	0.00	0	1	0	0	-1	0	0.00	8.62	78.96	12.17
Providence-Fall River RI-MA	100.00	64	100.00	4.69	17.19	59.38	18.75	5	9	0	-3	-1	0	2.29	19.31	58.94	19.32

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF CONNECTICUT				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area (2000):	% 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:												
Bridgeport CT MSA AA	16.99	4,329	404,701	887	62,667	0	0	2	1,000	5,218	468,368	10.43
Hartford CT AA	40.26	9,104	808,386	3,230	268,428	0	0	33	76,294	12,367	1,153,108	59.24
Limited Review:												
Danbury CT MSA AA	6.50	1,683	176,080	310	27,626	0	0	2	2,850	1,995	206,556	3.77
New Haven CT MSA AA	16.85	4,020	380,803	1,146	84,280	0	0	8	7,682	5,174	472,765	10.02
Stamford CT MSA AA	13.95	3,415	645,783	863	87,146	0	0	8	35,000	4,286	767,929	12.86
Waterbury CT MSA AA	5.45	1,199	99,870	471	32,068	0	0	5	24,180	1,675	156,118	3.68

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF CONNECTICUT						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
	% of Rated Area Loans (#) in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
MA/Assessment Area (2000):															
Full Review:															
Bridgeport CT MSA AA	16.99	862	54,199	227	2,249	0	0	529	3,763	5,773	26,849	7,391	87,060	10.43	
Hartford CT AA	40.26	2,363	144,105	872	9,170	0	0	1,050	6,797	24,732	123,786	29,017	283,858	59.24	
Limited Review:															
Danbury CT MSA AA	6.50	349	25,340	116	1,262	0	0	146	1,058	2,796	14,541	3,407	42,201	3.77	
New Haven CT MSA AA	16.85	1,044	63,581	288	3,094	0	0	509	3,714	10,615	44,017	12,456	114,406	10.02	
Stamford CT MSA AA	13.95	653	93,318	246	3,588	0	0	444	4,073	4,673	23,701	6,016	124,680	12.86	
Waterbury CT MSA AA	5.45	435	21,211	119	1,200	0	0	145	546	5,373	26,994	6,072	49,951	3.68	

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF CONNECTICUT					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Bridgeport CT MSA AA	1,220	20.62	1.84	3.20	7.54	13.20	59.52	62.21	31.10	21.39	4.26	7.29	8.03	4.27	3.07	
Hartford CT AA	2,197	37.12	1.33	2.28	7.19	6.78	67.43	57.67	24.05	33.23	3.21	7.57	2.48	2.95	3.80	
Limited Review:																
Danbury CT MSA AA	303	5.12	0.00	0.33	11.25	7.59	65.35	67.66	23.39	24.42	1.65	0.00	0.86	1.79	1.73	
New Haven CT MSA AA	1,127	19.04	2.71	1.51	11.04	7.72	55.77	49.42	30.48	41.35	3.82	1.97	2.30	3.59	4.94	
Stamford CT MSA AA	588	9.94	3.19	4.42	15.40	21.94	38.17	37.41	43.24	36.22	2.28	2.70	2.73	2.28	2.04	
Waterbury CT MSA AA	483	8.16	1.34	1.45	5.83	8.49	67.51	70.81	25.31	19.25	3.72	6.78	3.80	4.18	2.45	

* Based on 1999 Aggregate HMDA Data Only.

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

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF CONNECTICUT								Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MA/Assessment Area:	Total Home Improvement 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:															
Bridgeport CT MSA AA	972	18.97	1.84	0.82	7.54	2.57	59.52	50.82	31.10	45.78	25.02	3.51	6.21	22.27	41.95
Hartford CT AA	1,770	34.54	1.33	0.79	7.19	4.63	67.43	55.76	24.05	38.76	16.99	11.54	8.54	13.71	29.07
Limited Review:															
Danbury CT MSA AA	419	8.18	0.00	0.00	11.25	4.53	65.35	57.04	23.39	38.42	25.53	0.00	14.81	20.64	45.95
New Haven CT MSA AA	758	14.79	2.71	1.98	11.04	5.67	55.77	45.51	30.48	46.83	15.73	11.32	10.13	12.99	22.95
Stamford CT MSA AA	1,043	20.36	3.19	2.01	15.40	8.82	38.17	36.72	43.24	52.44	40.70	12.50	27.52	39.78	49.08
Waterbury CT MSA AA	162	3.16	1.34	1.23	5.83	3.09	67.51	53.09	25.31	42.59	11.13	0.00	4.76	9.46	18.44

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF CONNECTICUT								Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:															
Bridgeport CT MSA AA	2,137	16.82	1.84	0.75	7.54	3.84	59.52	53.63	31.10	41.79	8.59	1.36	6.22	8.27	9.79
Hartford CT AA	5,133	40.40	1.33	0.92	7.19	3.97	67.43	58.74	24.05	36.37	9.43	8.79	6.55	8.93	11.07
Limited Review:															
Danbury CT MSA AA	961	7.56	0.00	0.00	11.25	6.35	65.35	66.39	23.39	27.26	6.02	0.00	5.24	6.29	5.66
New Haven CT MSA AA	2,135	16.81	2.71	0.70	11.04	6.28	55.77	49.04	30.48	43.98	8.67	2.13	5.25	8.52	10.42
Stamford CT MSA AA	1,784	14.04	3.19	2.35	15.40	13.79	38.17	36.83	43.24	47.03	5.94	6.04	6.62	6.41	5.41
Waterbury CT MSA AA	554	4.36	1.34	0.54	5.83	1.62	67.51	62.82	25.31	35.02	6.34	5.36	2.20	6.77	6.28

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF CONNECTICUT					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Hartford CT AA	4	100.00	1.33	50.00	7.19	25.00	67.43	25.00	24.05	0.00	3.19	11.11	3.13	2.33	0.00	
Bridgeport CT MSA AA	0	0.00	1.84	0.00	7.54	0.00	59.52	0.00	31.10	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Waterbury CT MSA AA	0	0.00	1.34	0.00	5.83	0.00	67.51	0.00	25.31	0.00	0.00	0.00	0.00	0.00	0.00	
Stamford CT MSA AA	0	0.00	3.19	0.00	15.40	0.00	38.17	0.00	43.24	0.00	0.00	0.00	0.00	0.00	0.00	
New Haven CT MSA AA	0	0.00	2.71	0.00	11.04	0.00	55.77	0.00	30.48	0.00	0.00	0.00	0.00	0.00	0.00	
Danbury CT MSA AA	0	0.00	0.00	0.00	11.25	0.00	65.35	0.00	23.39	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF CONNECTICUT						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport CT MSA AA	887	12.84	6.25	5.41	12.20	12.63	54.62	56.37	25.90	25.14	6.21	5.02	5.92	6.99	5.18
Hartford CT AA	3,230	46.76	5.95	7.31	11.67	13.31	58.89	55.42	22.40	23.07	10.65	17.29	16.14	9.59	10.13
Limited Review:															
Danbury CT MSA AA	310	4.49	0.03	0.00	21.60	20.32	58.75	66.77	19.62	12.90	2.92	0.00	3.92	3.29	1.17
New Haven CT MSA AA	1,146	16.59	6.18	3.58	16.03	14.66	49.56	54.54	28.22	27.23	8.08	7.35	7.75	8.68	7.34
Stamford CT MSA AA	863	12.49	13.52	18.77	24.07	23.17	33.70	31.40	28.71	26.65	4.48	7.58	4.73	4.06	3.83
Waterbury CT MSA AA	471	6.82	10.84	12.53	9.02	8.28	54.45	57.54	25.68	21.66	11.91	15.08	17.88	11.86	10.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF CONNECTICUT						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport CT MSA AA	0	0.00	1.93	0.00	4.84	0.00	54.16	0.00	39.07	0.00	0.00	0.00	0.00	0.00	0.00
Hartford CT AA	0	0.00	0.52	0.00	5.56	0.00	63.64	0.00	30.15	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Danbury CT MSA AA	0	0.00	0.00	0.00	7.33	0.00	68.44	0.00	24.22	0.00	0.00	0.00	0.00	0.00	0.00
New Haven CT MSA AA	0	0.00	1.40	0.00	6.32	0.00	47.19	0.00	45.09	0.00	0.00	0.00	0.00	0.00	0.00
Stamford CT MSA AA	0	0.00	7.36	0.00	18.71	0.00	38.04	0.00	35.89	0.00	0.00	0.00	0.00	0.00	0.00
Waterbury CT MSA AA	0	0.00	0.38	0.00	2.66	0.00	51.71	0.00	45.25	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF CONNECTICUT					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Bridgeport CT MSA AA	1,220	20.62	19.51	17.60	18.01	35.54	24.11	25.60	38.37	21.26	3.64	8.42	4.82	3.61	1.99	
Hartford CT AA	2,197	37.12	17.54	10.50	18.44	25.33	26.84	24.26	37.17	39.91	2.68	3.25	2.56	2.34	2.94	
Limited Review:																
Danbury CT MSA AA	303	5.12	15.11	14.94	20.05	23.56	27.53	24.14	37.31	37.36	1.09	0.98	1.29	1.25	0.88	
New Haven CT MSA AA	1,127	19.04	18.64	6.30	18.51	20.47	25.09	23.88	37.76	49.34	3.27	2.47	2.39	2.55	4.64	
Stamford CT MSA AA	588	9.94	19.92	19.41	18.80	21.38	20.27	14.74	41.01	44.47	1.87	3.69	2.53	1.69	1.36	
Waterbury CT MSA AA	483	8.16	18.81	12.28	17.98	42.20	26.81	27.62	36.41	17.90	3.73	2.78	6.55	3.38	1.68	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 29.03% 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: STATE OF CONNECTICUT					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
Bridgeport CT MSA AA	972	18.97	19.51	8.02	18.01	18.75	24.11	26.77	38.37	46.47	22.00	17.93	18.98	18.77	27.43	
Hartford CT AA	1,770	34.54	17.54	9.94	18.44	17.80	26.84	23.56	37.17	48.70	13.52	17.21	10.07	10.05	17.62	
Limited Review:																
Danbury CT MSA AA	419	8.18	15.11	9.58	20.05	17.57	27.53	24.28	37.31	48.56	19.71	19.67	13.61	17.28	25.65	
New Haven CT MSA AA	758	14.79	18.64	8.95	18.51	16.72	25.09	20.61	37.76	53.72	12.37	11.04	9.09	10.09	15.97	
Stamford CT MSA AA	1,043	20.36	19.92	13.65	18.80	16.35	20.27	18.59	41.01	51.41	39.17	33.87	36.84	40.68	40.98	
Waterbury CT MSA AA	162	3.16	18.81	9.68	17.98	11.29	26.81	25.00	36.41	54.03	8.62	8.70	5.56	7.81	11.11	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 21.88% 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: STATE OF CONNECTICUT				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Bridgeport CT MSA AA	2,137	16.82	19.51	8.71	18.01	19.87	24.11	27.47	38.37	43.94	6.45	7.77	6.60	5.76	6.58	
Hartford CT AA	5,133	40.40	17.54	6.96	18.44	18.16	26.84	24.13	37.17	50.75	6.27	6.81	6.05	4.79	7.29	
Limited Review:																
Danbury CT MSA AA	961	7.56	15.11	10.77	20.05	21.14	27.53	28.05	37.31	40.04	3.56	4.66	3.72	3.52	3.27	
New Haven CT MSA AA	2,135	16.81	18.64	5.09	18.51	14.61	25.09	26.19	37.76	54.11	6.37	5.33	4.73	5.34	7.94	
Stamford CT MSA AA	1,784	14.04	19.92	13.74	18.80	19.82	20.27	19.92	41.01	46.52	4.22	8.18	5.10	4.19	3.31	
Waterbury CT MSA AA	554	4.36	18.81	8.03	17.98	16.42	26.81	23.36	36.41	52.19	3.89	3.95	3.69	2.20	5.25	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 44.83% of loans originated and purchased by BANK.

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

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

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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF CONNECTICUT			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Bridgeport CT MSA AA	887	12.84	85.04	68.88	87.15	8.91	3.95	6.21	5.53
Hartford CT AA	3,230	46.76	85.37	64.55	83.96	9.41	6.63	10.65	7.68
Limited Review:									
Danbury CT MSA AA	310	4.49	86.21	70.97	84.19	8.71	7.10	2.92	2.48
New Haven CT MSA AA	1,146	16.59	85.97	65.45	87.17	7.68	5.15	8.08	5.61
Stamford CT MSA AA	863	12.49	84.00	64.08	82.39	10.08	7.53	4.48	4.52
Waterbury CT MSA AA	471	6.82	85.68	62.42	86.41	7.22	6.37	11.91	2.98

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 9.15% 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: STATE OF CONNECTICUT			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Bridgeport CT MSA AA	0	0.00	91.10	0.00	0.00	0.00	0.00	0.00	0.00
Hartford CT AA	0	0.00	91.50	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Danbury CT MSA AA	0	0.00	93.33	0.00	0.00	0.00	0.00	0.00	0.00
New Haven CT MSA AA	0	0.00	88.77	0.00	0.00	0.00	0.00	0.00	0.00
Stamford CT MSA AA	0	0.00	87.12	0.00	0.00	0.00	0.00	0.00	0.00
Waterbury CT MSA AA	0	0.00	90.11	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF CONNECTICUT										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Bridgeport CT MSA AA	7,391	11.48	6.77	3.38	14.02	11.04	55.88	57.64	23.33	27.91	23.47	25.73	16.58	32.72	19.44	20.46	40.52	21.08	
Hartford CT AA	29,017	45.09	7.06	4.35	13.06	10.48	61.62	60.46	18.22	24.61	22.00	28.62	16.97	26.84	21.67	20.86	39.37	23.67	
Limited Review:																			
Danbury CT MSA AA	3,407	5.29	0.14	0.06	20.23	18.61	59.20	61.67	20.42	19.67	20.06	29.02	17.50	27.20	23.45	22.66	38.99	21.12	
New Haven CT MSA AA	12,456	19.35	7.28	4.41	19.68	16.57	50.78	50.94	22.25	28.08	23.33	27.32	16.06	27.65	20.69	20.99	39.92	24.03	
Stamford CT MSA AA	6,016	9.35	7.56	7.95	25.04	28.21	34.05	33.23	33.35	30.62	22.41	38.31	16.92	21.24	19.15	14.74	41.52	25.71	
Waterbury CT MSA AA	6,072	9.43	5.49	4.35	11.80	10.08	63.78	59.77	18.92	25.81	22.90	30.77	16.00	28.20	20.97	21.62	40.13	19.42	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: STATE OF CONNECTICUT									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Bridgeport CT MSA AA	3	2,176	39	3,029	42	2,636	6.60	0	0
Hartford CT AA	3	2,538	141	28,191	144	16,127	40.40	0	0
Limited Review:									
Danbury CT MSA AA	0	0	5	946	5	16	0.04	0	0
New Haven CT MSA AA	5	16,875	86	3,471	91	17,877	44.79	0	0
Stamford CT MSA AA	1	563	60	3,495	61	888	2.22	0	0
Waterbury CT MSA AA	0	0	20	3,279	20	2,372	5.94	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF CONNECTICUT				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:																	
Bridgeport CT MSA AA	10.43	24	15.38	8.33	16.67	50.00	20.83	0	2	0	0	-2	0	7.55	14.30	53.06	25.07
Hartford CT AA	59.24	64	41.03	12.50	10.94	56.25	18.75	3	15	0	-3	-7	-1	7.44	12.70	60.37	19.05
Limited Review:																	
Danbury CT MSA AA	3.77	9	5.77	0.00	22.22	66.67	11.11	0	1	0	-1	0	0	0.41	18.78	59.97	20.84
New Haven CT MSA AA	10.02	26	16.67	11.54	23.08	50.00	15.38	0	6	0	-1	-3	-2	8.30	18.71	49.45	23.54
Stamford CT MSA AA	12.86	24	15.38	8.33	25.00	54.17	12.50	0	1	0	0	-1	0	8.11	22.47	32.92	36.49
Waterbury CT MSA AA	3.68	9	5.77	33.33	0.00	55.56	11.11	0	2	0	0	-2	0	4.76	12.35	63.38	19.52

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area (2000):	% 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:												
West Palm Beach MSA	77.00	3,906	442,258	26	3,590	0	0	1	200	3,933	446,048	94.30
Limited Review:												
Sarasota FL MSA	23.00	1,173	126,235	2	70	0	0	0	0	1,175	126,305	5.70

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.
 ** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.
 *** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
	% of Rated Area Loans (#)in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
MA/Assessment Area (2000):														
Full Review:														
West Palm Beach MSA	77.00	102	10,935	17	181	0	0	26	506	638	2,699	783	14,321	94.30
Limited Review:														
Sarasota FL MSA	23.00	12	692	3	24	0	0	6	167	41	154	62	1,037	5.70

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	2,574	79.86	0.94	0.23	20.87	11.54	46.30	50.82	31.90	37.41	2.47	2.33	2.54	2.48	2.44	
Limited Review:																
Sarasota FL MSA	649	20.14	0.40	0.00	13.77	8.17	63.01	55.01	22.82	36.83	1.65	0.00	1.28	1.56	1.95	

* Based on 1999 Aggregate HMDA Data Only.

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

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	112	85.50	0.94	0.00	20.87	5.36	46.30	52.68	31.90	41.96	1.22	0.00	0.20	1.49	1.48	
Limited Review:																
Sarasota FL MSA	19	14.50	0.40	0.00	13.77	5.26	63.01	47.37	22.82	47.37	0.21	0.00	0.00	0.11	0.66	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	1,220	70.72	0.94	0.08	20.87	9.43	46.30	48.93	31.90	41.56	2.24	0.00	1.76	2.25	2.48	
Limited Review:																
Sarasota FL MSA	505	29.28	0.40	0.00	13.77	7.33	63.01	60.00	22.82	32.67	1.78	0.00	0.92	1.86	1.98	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF FLORIDA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	0	0.00	0.94	0.00	20.87	0.00	46.30	0.00	31.90	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Sarasota FL MSA	0	0.00	0.40	0.00	13.77	0.00	63.01	0.00	22.82	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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 Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans						
Full Review:																
West Palm Beach MSA	26	92.86	2.38	3.85	17.82	3.85	43.86	30.77	34.81	61.54	0.05	0.00	0.04	0.01	0.10	
Limited Review:																
Sarasota FL MSA	2	7.14	0.62	0.00	19.15	0.00	56.94	50.00	23.28	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	0	0.00	3.30	0.00	14.33	0.00	52.12	0.00	29.97	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Sarasota FL MSA	0	0.00	0.19	0.00	8.96	0.00	67.68	0.00	23.16	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	2,574	79.86	18.84	9.82	19.04	20.18	22.59	25.45	39.53	44.55	1.25	1.32	1.04	1.34	1.30	
Limited Review:																
Sarasota FL MSA	649	20.14	16.01	9.17	20.63	25.83	24.71	24.17	38.65	40.83	0.67	1.21	0.82	0.60	0.57	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 57.80% 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: STATE OF FLORIDA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
West Palm Beach MSA	112	85.50	18.84	3.33	19.04	21.67	22.59	31.67	39.53	43.33	0.95	0.73	1.07	0.62	1.18	
Limited Review:																
Sarasota FL MSA	19	14.50	16.01	0.00	20.63	17.65	24.71	11.76	38.65	70.59	0.15	0.00	0.35	0.00	0.20	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 41.22% 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: STATE OF FLORIDA					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
West Palm Beach MSA	1,220	70.72	18.84	5.57	19.04	16.43	22.59	23.96	39.53	54.04	0.74	0.52	0.67	0.58	0.92	
Limited Review:																
Sarasota FL MSA	505	29.28	16.01	5.74	20.63	15.57	24.71	28.69	38.65	50.00	0.65	0.50	0.60	0.53	0.79	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 72.12% of loans originated and purchased by BANK.

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

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

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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF FLORIDA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
West Palm Beach MSA	26	92.86	85.93	53.85	57.69	23.08	19.23	0.02	0.05
Limited Review:									
Sarasota FL MSA	2	7.14	86.35	50.00	100.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 21.43% of small loans to businesses originated and purchased by the bank.

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Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF FLORIDA			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
West Palm Beach MSA	0	0.00	87.42	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Sarasota FL MSA	0	0.00	85.89	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF FLORIDA										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
West Palm Beach MSA	783	92.66	2.46	0.00	22.51	14.43	46.24	44.83	28.77	40.74	22.31	18.30	16.74	23.49	19.99	21.33	40.96	36.89	
Limited Review:																			
Sarasota FL MSA	62	7.34	0.67	0.00	17.63	9.68	60.59	54.84	21.10	35.48	20.31	15.56	18.51	17.78	21.13	13.33	40.05	53.33	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: STATE OF FLORIDA		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
West Palm Beach MSA	1	821	27	6,637	28	7,458	99.73	0	0
Limited Review:									
Sarasota FL MSA	0	0	2	20	2	20	0.27	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	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:																	
West Palm Beach MSA	94.30	32	67	0.00	33.33	0.00	33.33	0	0	0	0	0	0	3.05	21.73	46.83	28.15
Limited Review:																	
Sarasota FL MSA	5.70	1	33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.83	18.21	59.69	21.27

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MAINE												
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000												
MA/Assessment Area (2000):	% 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:												
Portland ME MSA AA	38.65	3,080	312,049	515	55,138	0	0	8	213,80	3,603	338,567	56.87
Limited Review:												
Bangor ME AA	13.17	1,020	45,796	204	17,244	1	50	3	390	1,228	63,480	10.21
Lewiston ME MSA AA	10.51	785	45,170	193	23,393	0	0	2	3,250	980	71,813	7.48
Maine Non-MSA Areas	37.67	2,968	204,681	542	38,623	2	130	0	0	3,512	243,434	25.44

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: STATE OF MAINE														
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000														
	% of Rated Area Loans (#) in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
MA/Assessment Area (2000):														
Full Review:														
Portland ME MSA AA	38.65	432	26,446	141	1,336	0	0	210	1,175	3,727	15,417	4,510	44,374	56.87
Limited Review:														
Bangor ME AA	13.17	141	5,494	53	512	0	0	95	556	1,989	9,160	2,278	15,722	10.21
Lewiston ME MSA AA	10.51	104	3,741	25	249	0	0	62	505	1,289	5,576	1,480	10,071	7.48
Maine Non-MSA Areas	37.67	390	18,278	116	1,113	0	0	247	1,404	4,769	20,384	5,522	41,179	25.44

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF MAINE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	891	47.44	0.86	1.68	5.85	5.72	75.30	66.11	17.99	26.49	4.43	1.57	4.21	4.06	6.41	
Limited Review:																
Bangor ME AA	114	6.07	0.00	0.00	8.37	16.67	85.98	78.95	5.65	4.39	2.14	0.00	2.84	2.14	0.97	
Lewiston ME MSA AA	224	11.93	0.20	0.00	4.49	2.23	85.35	86.61	9.96	11.16	4.86	0.00	3.53	4.90	5.52	
Maine Non-MSA Areas	649	34.56	0.00	0.00	0.93	0.46	67.18	62.10	31.89	37.44	4.07	0.00	0.00	4.24	3.85	

* Based on 1999 Aggregate HMDA Data Only.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	573	34.66	0.86	0.87	5.85	3.66	75.30	72.95	17.99	22.51	25.90	20.00	15.63	24.02	38.36	
Limited Review:																
Bangor ME AA	272	16.45	0.00	0.00	8.37	6.99	85.98	90.07	5.65	2.94	23.10	0.00	12.12	23.99	25.00	
Lewiston ME MSA AA	154	9.32	0.20	0.00	4.49	3.25	85.35	87.66	9.96	9.09	16.83	0.00	0.00	17.67	15.00	
Maine Non-MSA Areas	654	39.56	0.00	0.00	0.93	0.76	67.18	66.21	31.89	33.03	23.90	0.00	28.57	24.72	22.02	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	1,616	37.39	0.86	1.11	5.85	4.58	75.30	63.74	17.99	30.57	9.82	13.51	8.11	9.17	12.19	
Limited Review:																
Bangor ME AA	634	14.67	0.00	0.00	8.37	8.68	85.98	87.22	5.65	4.10	11.52	0.00	8.06	12.19	7.06	
Lewiston ME MSA AA	407	9.42	0.20	0.25	4.49	2.21	85.35	82.06	9.96	15.48	8.89	7.69	4.69	8.59	14.41	
Maine Non-MSA Areas	1,665	38.52	0.00	0.00	0.93	0.54	67.18	63.54	31.89	35.92	12.49	0.00	9.09	13.20	11.31	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF MAINE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	0	0.00	0.86	0.00	5.85	0.00	75.30	0.00	17.99	0.00	5.00	0.00	0.00	0.00	0.00	
Limited Review:																
Maine Non-MSA Areas	0	0.00	0.00	0.00	0.93	0.00	67.18	0.00	31.89	0.00	0.00	0.00	0.00	0.00	0.00	
Lewiston ME MSA AA	0	0.00	0.20	0.00	4.49	0.00	85.35	0.00	9.96	0.00	0.00	0.00	0.00	0.00	0.00	
Bangor ME AA	0	0.00	0.00	0.00	8.37	0.00	85.98	0.00	5.65	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF MAINE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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 Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans						
Full Review:																
Portland ME MSA AA	515	35.42	5.93	7.38	18.05	19.81	63.14	58.06	12.88	14.76	4.92	7.89	5.50	4.65	4.99	
Limited Review:																
Bangor ME AA	204	14.03	0.00	0.00	18.60	13.24	73.36	84.31	6.49	0.98	4.26	0.00	3.15	5.07	0.00	
Lewiston ME MSA AA	193	13.27	7.04	6.22	12.22	18.13	73.94	66.32	6.80	9.33	6.47	4.44	12.36	5.47	23.81	
Maine Non-MSA Areas	542	37.28	0.00	0.00	3.58	3.87	66.51	66.24	29.91	29.89	3.47	0.00	6.12	3.39	3.44	

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	0	0.00	2.40	0.00	7.51	0.00	72.37	0.00	17.72	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Bangor ME AA	1	33.33	0.00	0.00	10.07	0.00	84.17	100.00	5.76	0.00	0.00	0.00	0.00	0.00	0.00	
Lewiston ME MSA AA	0	0.00	0.78	0.00	0.00	0.00	90.70	0.00	8.53	0.00	0.00	0.00	0.00	0.00	0.00	
Maine Non-MSA Areas	2	66.67	0.00	0.00	2.03	0.00	71.22	0.00	26.74	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MAINE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Purchase 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:																
Portland ME MSA AA	891	47.44	17.08	4.83	19.73	17.02	26.29	21.58	36.90	56.57	4.40	3.17	3.96	2.90	5.74	
Limited Review:																
Bangor ME AA	114	6.07	19.53	9.71	18.67	21.36	24.64	32.04	37.17	36.89	1.99	2.97	1.49	2.37	1.85	
Lewiston ME MSA AA	224	11.93	18.81	4.59	17.44	24.49	26.10	34.18	37.66	36.73	4.59	5.66	5.57	5.59	3.16	
Maine Non-MSA Areas	649	34.56	14.26	2.62	16.75	12.90	24.86	25.42	44.13	59.07	3.81	1.79	3.81	3.37	4.21	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 15.87% 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: STATE OF MAINE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
Portland ME MSA AA	573	34.66	17.08	6.09	19.73	21.31	26.29	25.53	36.90	47.07	19.83	15.38	22.40	17.67	21.31	
Limited Review:																
Bangor ME AA	272	16.45	19.53	9.33	18.67	19.11	24.64	24.44	37.17	47.11	20.20	34.48	22.08	19.47	17.51	
Lewiston ME MSA AA	154	9.32	18.81	6.56	17.44	18.03	26.10	21.31	37.66	54.10	12.41	7.69	17.78	11.90	11.49	
State of Maine Non-MSA Areas	654	39.56	14.26	5.30	16.75	13.85	24.86	24.24	44.13	56.62	18.60	16.07	19.70	19.51	18.15	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 23.47% 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: STATE OF MAINE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Portland ME MSA AA	1,616	37.39	17.08	5.84	19.73	14.27	26.29	23.28	36.90	56.61	7.82	6.98	6.87	7.28	8.55	
Limited Review:																
Bangor ME AA	634	14.67	19.53	5.87	18.67	16.77	24.64	28.09	37.17	49.27	9.47	5.71	11.01	10.48	8.82	
Lewiston ME MSA AA	407	9.42	18.81	4.86	17.44	11.46	26.10	28.47	37.66	55.21	6.77	10.00	6.51	5.63	7.20	
Maine Non-MSA Areas	1,665	38.52	14.26	4.36	16.75	12.52	24.86	21.61	44.13	61.50	9.53	10.53	10.00	7.92	9.97	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 33.20% of loans originated and purchased by BANK.

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

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

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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MAINE			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Portland ME MSA AA	515	35.42	84.25	67.96	80.97	8.54	10.49	4.92	4.86
Limited Review:									
Bangor ME AA	204	14.03	85.82	70.10	85.78	9.31	4.90	4.26	3.69
Lewiston ME MSA AA	193	13.27	84.19	58.03	74.09	11.92	13.99	6.47	6.99
Maine Non-MSA Areas	542	37.28	86.89	76.57	86.72	7.93	5.35	3.47	3.95

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 7.22% 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: STATE OF MAINE			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Portland ME MSA AA	0	0.00	87.69	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Bangor ME AA	1	33.33	87.77	0.00	100.00	0.00	0.00	0.00	0.00
Lewiston ME MSA AA	0	0.00	91.47	0.00	0.00	0.00	0.00	0.00	0.00
Maine Non-MSA Areas	2	66.67	92.15	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 33.33% of small loans to farms originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF MAINE										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Portland ME MSA AA	4,510	32.70	4.81	3.75	11.49	10.75	69.69	67.29	14.01	18.20	21.75	16.19	16.44	29.84	21.38	24.32	40.42	29.65	
Limited Review:																			
Bangor ME AA	2,278	16.52	0.00	0.00	14.53	11.90	78.64	83.63	6.83	4.30	22.69	14.13	17.29	30.10	19.79	32.69	40.23	23.08	
Lewiston ME MSA AA	1,480	10.73	2.26	0.88	16.18	7.23	74.29	83.58	7.26	8.31	23.45	13.25	15.79	23.97	21.21	39.31	39.54	23.47	
Maine Non-MSA Areas	5,522	40.04	0.00	0.00	1.99	1.16	68.99	68.13	29.02	30.71	19.15	9.02	15.23	20.96	20.02	44.77	45.61	25.26	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: STATE OF MAINE		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Portland ME MSA AA	0	0	24	6,615	24	6,615	54.62	0	0
Limited Review:									
Bangor ME AA	0	0	14	1,228	14	1,228	10.14	0	0
Lewiston ME MSA AA	0	0	6	869	6	869	7.17	0	0
Maine Non-MSA Areas	0	0	16	3,400	16	3,400	28.07	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
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:																	
Portland ME MSA AA	56.87	14	26.42	0.00	21.43	50.00	28.57	0	1	0	0	-1	0	3.90	9.80	71.72	14.57
Limited Review:																	
Bangor ME AA	10.21	9	16.98	0.00	22.22	77.78	0.00	0	1	0	0	-1	0	0.00	14.16	75.29	10.33
Lewiston ME MSA AA	7.48	7	13.20	14.29	28.57	57.14	0.00	0	0	0	0	0	0	1.69	14.41	76.36	7.54
Maine Non-MSA Areas	25.44	23	43.40	0.00	8.70	73.91	17.39	0	0	0	0	0	0	0.00	1.60	69.07	29.26

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area (2000):	% 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:												
Springfield MA MSA AA	19.69	3,602	228,232	1,251	82,139	0	0	14	8,877	4,867	319,248	22.49
Worcester MA MSA AA	26.24	5,202	452,080	1,271	101,342	0	0	11	4,185	6,484	557,607	32.29
Limited Review:												
Barnstable MA MSA	15.00	3,141	396,632	565	33,223	0	0	0	0	3,706	429,855	15.23
Brockton MA MSA AA	9.26	1,762	161,564	526	55,206	0	0	0	0	2,288	216,770	4.32
Fitchburg MA MSA AA	5.33	1,001	79,801	317	25,949	0	0	0	0	1,318	105,750	4.76
Lowell, MA-NH MSA AA	14.21	2,861	260,580	649	59,167	0	0	1	200	3,511	319,947	10.98
New Bedford MA MSA AA	7.46	1,373	90,355	470	41,790	0	0	0	0	1,843	132,145	8.08
Western MA Non-metro AA	2.82	571	33,471	126	8,544	0	0	0	0	697	42,015	1.86

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
	% of Rated Area Loans (#) in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
MA/Assessment Area (2000):														
Full Review:														
Springfield MA MSA AA	19.69	1,322	56,302	440	3,860	0	0	549	3,228	17,664	61,423	19,975	124,813	22.49
Worcester MA MSA AA	26.24	2,106	91,371	502	5,013	0	0	577	3,372	17,650	58,424	20,835	158,180	32.29
Limited Review:														
Barnstable MA MSA	15.00	1,403	76,127	206	2,184	0	0	199	1,541	6,308	20,832	8,116	100,684	15.23
Brockton MA MSA AA	9.26	606	23,262	98	992	0	0	169	1,252	4,943	16,608	5,816	42,114	4.32
Fitchburg MA MSA AA	5.33	306	11,371	89	844	0	0	76	387	2,509	9,018	2,980	21,620	4.76
Lowell, MA-NH MSA AA	14.21	1,368	59,031	300	3,131	0	0	197	1,104	8,435	27,510	10,300	90,776	10.98
New Bedford MA MSA AA	7.46	466	20,748	115	1,132	0	0	331	2,568	3,990	13,965	4,902	38,413	8.08
Western MA Non-metro AA	2.82	161	5,310	62	492	0	0	46	313	1,834	6,286	2,103	12,401	1.86

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Total Home Purchase 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:															
Springfield MA MSA AA	914	17.20	1.58	3.61	6.20	9.96	66.38	69.80	25.84	16.63	4.66	8.52	5.78	4.85	3.45
Worcester MA MSA AA	1,526	28.72	0.71	2.49	7.63	7.80	69.34	66.06	22.33	23.66	6.09	12.88	8.24	6.14	5.10
Limited Review:															
Barnstable MA MSA	860	16.18	0.00	0.00	3.92	7.56	76.38	72.56	19.70	19.88	4.79	0.00	3.81	4.60	5.80
Brockton MA MSA AA	495	9.32	0.95	3.64	9.59	19.39	81.61	70.10	7.85	6.87	3.73	10.64	5.17	3.51	1.98
Fitchburg MA MSA AA	365	6.87	0.34	0.00	12.51	18.08	62.67	62.47	24.48	19.45	6.24	0.00	9.35	6.21	4.70
Lowell, MA-NH MSA AA	859	16.16	0.83	3.84	10.40	22.00	64.04	55.65	24.73	18.51	4.69	7.97	9.30	3.94	4.09
New Bedford MA MSA AA	202	3.80	0.65	0.50	10.87	15.35	58.22	55.45	30.26	28.71	3.06	0.00	3.24	2.87	3.37
Western MA Non-metro AA	93	1.75	0.00	0.00	8.89	5.38	75.78	72.04	15.33	22.58	4.33	0.00	1.68	5.04	3.70

* Based on 1999 Aggregate HMDA Data Only.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MASSACHUSETTS				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Springfield MA MSA AA	574	17.66	1.58	2.44	6.20	6.97	66.38	60.98	25.84	29.62	18.65	19.44	17.50	16.00	27.57	
Worcester MA MSA AA	783	24.08	0.71	0.64	7.63	4.21	69.34	61.30	22.33	33.84	21.29	8.33	9.49	18.48	38.21	
Limited Review:																
Barnstable MA MSA	536	16.49	0.00	0.00	3.92	4.85	76.38	72.76	19.70	22.39	30.13	0.00	58.82	28.13	33.11	
Brockton MA MSA AA	279	8.58	0.95	0.72	9.59	5.02	81.61	84.95	7.85	9.32	14.80	20.00	7.58	16.01	10.13	
Fitchburg MA MSA AA	105	3.23	0.34	0.00	12.51	13.33	62.67	57.14	24.48	29.52	11.56	0.00	18.42	8.61	17.05	
Lowell, MA-NH MSA AA	532	16.36	0.83	0.38	10.40	6.95	64.04	62.41	24.73	30.26	28.65	16.67	20.59	27.78	35.44	
New Bedford MA MSA AA	335	10.30	0.65	1.49	10.87	10.15	58.22	55.82	30.26	32.54	22.16	25.00	30.65	19.59	24.31	
Western MA Non-metro AA	107	3.29	0.00	0.00	8.89	4.67	75.78	76.64	15.33	18.69	20.98	0.00	9.09	22.58	21.43	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
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:															
Springfield MA MSA AA	2,114	19.32	1.58	0.90	6.20	4.78	66.38	64.85	25.84	29.47	9.33	5.19	9.05	9.96	8.42
Worcester MA MSA AA	2,889	26.41	0.71	0.69	7.63	5.16	69.34	64.42	22.33	29.73	9.62	8.16	10.16	9.18	10.70
Limited Review:															
Barnstable MA MSA	1,745	15.95	0.00	0.00	3.92	7.62	76.38	69.91	19.70	22.46	6.70	0.00	8.13	6.36	7.53
Brockton MA MSA AA	987	9.02	0.95	0.41	9.59	9.63	81.61	80.24	7.85	9.73	5.38	1.23	4.84	5.55	4.99
Fitchburg MA MSA AA	530	4.84	0.34	0.57	12.51	9.06	62.67	60.19	24.48	30.00	7.61	25.00	6.15	7.04	9.17
Lowell, MA-NH MSA AA	1,470	13.44	0.83	0.34	10.40	6.33	64.04	65.17	24.73	28.16	6.80	6.90	6.26	6.61	7.45
New Bedford MA MSA AA	835	7.63	0.65	0.48	10.87	9.46	58.22	54.25	30.26	35.81	9.87	16.67	11.28	10.55	8.61
Western MA Non-metro AA	371	3.39	0.00	0.00	8.89	7.55	75.78	66.04	15.33	26.42	11.67	0.00	16.87	10.27	15.32

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF MASSACHUSETTS					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Worcester MA MSA AA	4	57.14	0.71	50.00	7.63	25.00	69.34	25.00	22.33	0.00	5.00	20.00	3.85	2.63	0.00	
Springfield MA MSA AA	0	0.00	1.58	0.00	6.20	0.00	66.38	0.00	25.84	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Western MA Non-metro AA	0	0.00	0.00	0.00	8.89	0.00	75.78	0.00	15.33	0.00	0.00	0.00	0.00	0.00	0.00	
New Bedford MA MSA AA	1	14.29	0.65	0.00	10.87	100.00	58.22	0.00	30.26	0.00	0.00	0.00	0.00	0.00	0.00	
Lowell, MA-NH MSA AA	0	0.00	0.83	0.00	10.40	0.00	64.04	0.00	24.73	0.00	0.00	0.00	0.00	0.00	0.00	
Fitchburg MA MSA AA	1	14.29	0.34	100.00	12.51	0.00	62.67	0.00	24.48	0.00	3.70	1.00	0.00	0.00	0.00	
Brockton MA MSA AA	1	14.29	0.95	100.00	9.59	0.00	81.61	0.00	7.85	0.00	1.64	33.33	0.00	0.00	0.00	
Barnstable MA MSA	0	0.00	0.00	0.00	3.92	0.00	76.38	0.00	19.70	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MA MSA AA	1,251	24.17	7.60	10.79	14.83	18.31	59.20	47.32	17.79	22.78	10.33	20.22	12.89	9.05	8.96
Worcester MA MSA AA	1,271	24.56	9.18	11.96	12.69	8.89	58.06	55.63	19.94	23.45	14.49	21.18	11.88	13.31	16.65
Limited Review:															
Barnstable MA MSA	565	10.92	0.00	0.00	13.73	13.98	68.08	59.12	18.19	26.90	5.78	0.00	5.09	5.02	8.52
Brockton MA MSA AA	526	10.16	3.84	4.94	12.92	11.22	74.98	77.19	8.26	6.65	10.33	12.28	13.10	10.01	9.66
Fitchburg MA MSA AA	317	6.13	4.75	1.89	21.17	22.71	55.96	58.04	18.07	17.35	13.12	22.22	20.00	12.72	9.13
Lowell, MA-NH MSA AA	649	12.54	8.25	5.70	10.68	9.71	52.85	52.70	28.22	31.90	11.23	10.78	13.41	10.97	11.21
New Bedford MA MSA AA	470	9.08	1.05	4.04	22.19	24.47	51.35	50.43	25.41	21.06	13.33	29.41	16.30	13.77	8.44
Western MA Non-metro AA	126	2.43	0.00	0.00	19.97	12.70	66.60	56.35	13.43	30.95	6.06	0.00	3.45	4.97	12.90

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF MASSACHUSETTS						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MA MSA AA	0	0.00	0.97	0.00	4.46	0.00	62.95	0.00	31.62	0.00	0.00	0.00	0.00	0.00	0.00
Worcester MA MSA AA	0	0.00	0.56	0.00	3.54	0.00	70.02	0.00	25.70	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Barnstable MA MSA	0	0.00	0.00	0.00	4.03	0.00	72.46	0.00	23.51	0.00	0.00	0.00	0.00	0.00	0.00
Brockton MA MSA AA	0	0.00	0.00	0.00	3.20	0.00	90.04	0.00	6.76	0.00	0.00	0.00	0.00	0.00	0.00
Fitchburg MA MSA AA	0	0.00	0.00	0.00	9.17	0.00	56.67	0.00	34.17	0.00	0.00	0.00	0.00	0.00	0.00
Lowell, MA-NH MSA AA	0	0.00	0.00	0.00	4.56	0.00	60.84	0.00	34.60	0.00	0.00	0.00	0.00	0.00	0.00
New Bedford MA MSA AA	0	0.00	0.00	0.00	14.78	0.00	35.22	0.00	50.00	0.00	0.00	0.00	0.00	0.00	0.00
Western MA Non-metro AA	0	0.00	0.00	0.00	4.68	0.00	82.13	0.00	13.19	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MASSACHUSETTS					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Springfield MA MSA AA	914	17.20	20.90	13.90	16.49	44.68	24.36	22.34	38.25	19.09	4.86	14.86	9.70	3.29	1.92	
Worcester MA MSA AA	1,526	28.72	18.84	7.31	17.66	28.91	25.47	28.07	38.04	35.71	5.24	9.84	8.45	4.64	3.86	
Limited Review:																
Barnstable MA MSA	860	16.18	17.35	3.41	18.42	12.30	24.43	17.48	39.80	66.81	4.75	4.55	4.72	3.84	5.05	
Brockton MA MSA AA	495	9.32	18.76	6.93	17.59	36.53	26.35	32.00	37.30	24.53	3.32	3.95	5.56	2.75	2.30	
Fitchburg MA MSA AA	365	6.87	20.27	11.22	16.77	26.19	25.98	34.69	36.98	27.89	6.69	12.41	7.62	7.09	4.74	
Lowell, MA-NH MSA AA	859	16.16	18.17	12.13	17.79	36.81	26.92	29.62	37.12	21.44	4.81	8.31	7.92	4.18	2.84	
New Bedford MA MSA AA	202	3.80	22.29	5.56	16.21	18.33	22.26	26.11	39.24	50.00	3.27	3.85	7.05	2.59	2.67	
Western MA Non-metro AA	93	1.75	19.27	3.61	18.48	22.89	27.13	33.73	35.12	39.76	4.66	3.08	3.33	6.38	4.70	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 19.53% 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: STATE OF MASSACHUSETTS					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
Springfield MA MSA AA	574	17.66	20.90	10.24	16.49	21.13	24.36	23.97	38.25	44.66	15.19	19.82	19.50	10.66	15.23	
Worcester MA MSA AA	783	24.08	18.84	5.33	17.66	17.35	25.47	23.71	38.04	53.61	15.05	11.63	15.15	10.96	18.52	
Limited Review:																
Barnstable MA MSA	536	16.49	17.35	2.31	18.42	11.79	24.43	21.54	39.80	64.36	22.86	23.08	17.07	15.70	28.05	
Brockton MA MSA AA	279	8.58	18.76	7.96	17.59	20.90	26.35	26.87	37.30	44.28	10.62	17.65	11.64	8.89	10.86	
Fitchburg MA MSA AA	105	3.23	20.27	7.69	16.77	23.08	25.98	32.05	36.98	37.18	9.22	5.00	7.94	9.02	10.56	
Lowell, MA-NH MSA AA	532	16.36	18.17	5.34	17.79	17.96	26.92	33.98	37.12	42.72	22.30	25.00	24.80	22.27	20.71	
New Bedford MA MSA AA	335	10.30	22.29	8.97	16.21	16.90	22.26	29.66	39.24	44.48	19.97	20.00	29.55	22.22	15.99	
Western MA Non-metro AA	107	3.29	19.27	9.30	18.48	12.79	27.13	36.05	35.12	41.86	16.40	20.00	6.82	16.95	21.21	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 23.16% 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: STATE OF MASSACHUSETTS				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
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:																
Springfield MA MSA AA	2,114	19.32	20.90	5.66	16.49	16.17	24.36	27.94	38.25	50.22	6.15	9.50	6.39	6.07	5.80	
Worcester MA MSA AA	2,889	26.41	18.84	5.24	17.66	15.84	25.47	28.44	38.04	50.48	5.58	6.12	6.05	4.78	5.85	
Limited Review:																
Barnstable MA MSA	1,745	15.95	17.35	4.18	18.42	10.69	24.43	22.21	39.80	62.92	5.51	5.10	5.33	6.04	5.39	
Brockton MA MSA AA	987	9.02	18.76	6.12	17.59	17.66	26.35	29.72	37.30	46.50	3.48	4.04	3.63	2.85	3.80	
Fitchburg MA MSA AA	530	4.84	20.27	6.23	16.77	16.26	25.98	27.68	36.98	49.83	4.97	6.40	4.25	4.16	5.76	
Lowell, MA-NH MSA AA	1,470	13.44	18.17	6.24	17.79	21.36	26.92	31.99	37.12	40.42	4.69	5.40	4.23	4.51	4.97	
New Bedford MA MSA AA	835	7.63	22.29	6.29	16.21	13.11	22.26	30.24	39.24	50.35	8.40	11.34	8.18	9.13	7.92	
Western MA Non-metro AA	371	3.39	19.27	2.79	18.48	15.35	27.13	32.09	35.12	49.77	7.62	7.69	4.25	8.88	8.33	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 42.88% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MASSACHUSETTS			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Springfield MA MSA AA	1,251	24.17	85.79	59.95	86.41	8.07	5.52	10.33	3.12
Worcester MA MSA AA	1,271	24.56	86.23	54.52	83.08	9.05	7.87	14.49	4.06
Limited Review:									
Barnstable MA MSA	565	10.92	87.54	59.12	87.26	7.61	5.13	5.78	0.95
Brockton MA MSA AA	526	10.16	84.56	47.91	76.62	11.60	11.79	10.33	3.96
Fitchburg MA MSA AA	317	6.13	85.14	50.16	78.23	14.83	6.94	13.12	4.46
Lowell, MA-NH MSA AA	649	12.54	84.02	55.32	83.20	8.47	8.32	11.23	5.45
New Bedford MA MSA AA	470	9.08	87.56	63.83	80.00	12.13	7.87	13.33	6.15
Western MA Non-metro AA	126	2.43	85.58	64.29	85.71	10.32	3.97	6.06	3.31

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 17.18% 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: STATE OF MASSACHUSETTS			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Springfield MA MSA AA	0	0.00	91.23	0.00	0.00	0.00	0.00	0.00	0.00
Worcester MA MSA AA	0	0.00	91.81	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Barnstable MA MSA	0	0.00	90.50	0.00	0.00	0.00	0.00	0.00	0.00
Brockton MA MSA AA	0	0.00	91.10	0.00	0.00	0.00	0.00	0.00	0.00
Fitchburg MA MSA AA	0	0.00	87.50	0.00	0.00	0.00	0.00	0.00	0.00
Lowell, MA-NH MSA AA	0	0.00	88.97	0.00	0.00	0.00	0.00	0.00	0.00
New Bedford MA MSA AA	0	0.00	88.70	0.00	0.00	0.00	0.00	0.00	0.00
Western MA Non-metro AA	0	0.00	88.51	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF MASSACHUSETTS										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Springfield MA MSA AA	19,975	26.62	8.00	8.46	10.92	10.60	62.51	57.07	18.57	23.80	25.22	26.66	14.83	25.06	19.42	23.26	40.53	25.02	
Worcester MA MSA AA	20,835	27.77	4.38	4.33	15.45	12.53	63.19	57.58	16.97	24.56	24.47	27.73	15.41	24.37	20.53	21.46	39.59	26.44	
Limited Review:																			
Barnstable MA MSA	8,116	10.82	0.00	0.00	6.68	5.52	75.16	69.07	18.17	25.41	22.43	17.80	16.07	25.28	20.49	22.17	41.01	34.75	
Brockton MA MSA AA	5,816	7.75	3.09	1.65	17.54	13.62	73.05	74.42	6.31	10.32	23.83	25.89	15.43	27.15	21.44	24.99	39.30	21.97	
Fitchburg MA MSA AA	2,980	3.97	2.20	1.51	21.43	15.54	58.52	56.24	17.84	26.38	25.07	26.01	14.69	30.57	19.64	21.19	40.59	22.22	
Lowell, MA-NH MSA AA	10,300	13.73	5.68	3.04	18.59	15.04	56.49	55.84	19.24	26.08	22.91	28.26	15.46	23.36	22.17	22.76	39.45	25.62	
New Bedford MA MSA AA	4,902	6.53	1.72	1.14	23.52	15.91	53.17	55.69	21.60	27.25	27.39	24.61	13.69	25.58	17.64	23.73	41.27	26.07	
Western MA Non-metro AA	2,103	2.80	0.00	0.00	15.00	12.89	72.30	66.76	12.70	20.35	24.09	20.61	16.16	33.26	21.18	25.25	38.57	20.88	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: STATE OF MASSACHUSETTS									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Springfield MA MSA AA	4	6,601	55	133,799	59	140,400	77.83	0	0
Worcester MA MSA AA	1	687	60	21,381	61	22,068	12.23	0	0
Limited Review:									
Barnstable MA MSA	1	2,748	19	1,669	20	4,417	2.45	0	0
Brockton MA MSA AA	0	0	22	618	22	618	0.34	0	0
Fitchburg MA MSA AA	0	0	10	767	10	767	0.43	0	0
Lowell, MA-NH MSA AA	2	1,057	22	8,299	24	9,356	5.19	0	0
New Bedford MA MSA AA	1	584	22	986	23	1,570	0.87	0	0
Western MA Non-metro AA	1	400	11	804	12	1,204	0.67	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF MASSACHUSETTS				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:																	
Springfield MA MSA AA	22.49	43	34.68	9.30	11.63	62.79	16.28	2	14	-1	-2	-7	-2	9.72	10.61	59.39	19.99
Worcester MA MSA AA	32.29	25	20.16	16.00	4.00	56.00	24.00	3	2	0	0	0	+1	4.48	15.14	62.16	17.87
Limited Review:																	
Barnstable MA MSA	15.23	11	8.87	0.00	9.09	81.82	9.09	0	0	0	0	0	0	0.00	5.88	74.86	19.20
Brockton MA MSA AA	4.32	7	5.65	0.00	14.29	57.14	28.57	0	0	0	0	0	0	2.66	16.76	73.99	6.58
Fitchburg MA MSA AA	4.76	6	4.84	16.67	33.33	16.67	33.33	0	0	0	0	0	0	1.34	19.83	59.44	18.70
Lowell, MA-NH MSA AA	10.98	8	6.45	0.00	12.50	37.50	50.00	0	0	0	0	0	0	5.74	17.93	56.78	19.55
New Bedford MA MSA AA	8.08	13	10.48	7.69	15.38	69.23	7.69	2	3	0	0	-1	0	1.90	21.63	53.64	22.74
Western MA Non-metro AA	1.86	11	8.87	0.00	9.09	54.55	36.36	0	0	0	0	0	0	0.00	13.32	73.17	13.51

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NEW HAMPSHIRE						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area (2000):	% 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:												
Nashua NH MSA AA	38.50	1,613	124,482	664	54,372	0	0	4	1,308	2,281	180,162	42.32
Limited Review:												
Manchester NH MSA AA	31.84	1,382	106,821	500	45,247	0	0	4	6,921	1,886	158,989	38.41
New Hampshire Non-MSA	29.66	1,485	108,504	272	27,062	0	0	0	0	1,757	135,566	19.28

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF NEW HAMPSHIRE						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
	% of Rated Area Loans (#)in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
MA/Assessment Area (2000):														
Full Review:														
Nashua NH MSA AA	38.50	764	31,839	198	1,954	0	0	129	826	5,113	18,392	6,204	53,011	42.32
Limited Review:														
Manchester NH MSA AA	31.84	373	17,171	173	1,656	0	0	158	1,129	3,469	12,779	4,173	32,735	38.41
New Hampshire Non-MSA	29.66	211	11,802	93	803	0	0	180	1,314	3,244	13,837	3,728	27,756	19.28

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Nashua NH MSA AA	368	41.26	0.00	0.00	9.43	12.50	66.32	65.76	24.25	21.74	2.40	0.00	3.33	2.37	2.14	
Limited Review:																
Manchester NH MSA AA	280	31.39	0.46	0.36	7.45	5.71	68.88	53.57	23.22	40.36	2.21	0.00	1.74	1.88	3.08	
New Hampshire Non-MSA	244	27.35	0.00	0.00	1.09	1.23	78.49	76.23	20.41	22.54	2.07	0.00	0.00	2.09	2.12	

* Based on 1999 Aggregate HMDA Data Only.

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

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF NEW HAMPSHIRE								Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
MA/Assessment Area:	Total Home Improvement 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:															
Nashua NH MSA AA	338	34.53	0.00	0.00	9.43	9.76	66.32	62.13	24.25	28.11	22.75	0.00	21.05	20.98	28.22
Limited Review:															
Manchester NH MSA AA	327	33.40	0.46	0.00	7.45	3.36	68.88	51.38	23.22	45.26	17.29	0.00	9.84	13.08	31.12
New Hampshire Non-MSA	314	32.07	0.00	0.00	1.09	0.00	78.49	77.39	20.41	22.61	17.81	0.00	0.00	18.94	14.20

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF NEW HAMPSHIRE								Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:															
Nashua NH MSA AA	906	34.75	0.00	0.00	9.43	8.06	66.32	61.48	24.25	30.46	6.92	0.00	4.77	7.13	7.15
Limited Review:															
Manchester NH MSA AA	774	29.69	0.46	0.65	7.45	4.78	68.88	55.68	23.22	38.89	6.13	0.00	5.32	5.90	6.83
New Hampshire Non-MSA	927	35.56	0.00	0.00	1.09	1.08	78.49	72.06	20.41	26.86	7.65	0.00	6.52	7.86	7.09

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Nashua NH MSA AA	1	50.00	0.00	0.00	9.43	0.00	66.32	100.00	24.25	0.00	6.67	0.00	0.00	10.00	0.00	
Limited Review:																
New Hampshire Non-MSA	0	0.00	0.00	0.00	1.09	0.00	78.49	0.00	20.41	0.00	0.00	0.00	0.00	0.00	0.00	
Manchester NH MSA AA	1	50.00	0.46	0.00	7.45	100.00	68.88	0.00	23.22	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF NEW HAMPSHIRE						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashua NH MSA AA	664	46.24	0.00	0.00	17.83	20.93	60.75	60.24	21.42	18.83	11.91	0.00	17.42	11.32	9.57
Limited Review:															
Manchester NH MSA AA	500	34.82	8.80	8.80	17.01	16.80	48.93	40.80	25.25	33.60	8.30	9.60	9.84	8.13	6.98
New Hampshire Non-MSA	272	18.94	0.00	0.00	0.72	0.00	79.91	74.26	19.36	25.74	1.88	0.00	0.67	2.01	1.89

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Nashua NH MSA AA	0	0.00	0.00	0.00	9.88	0.00	64.43	0.00	25.69	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Manchester NH MSA AA	0	0.00	0.51	0.00	3.55	0.00	63.96	0.00	31.98	0.00	0.00	0.00	0.00	0.00	0.00	
New Hampshire Non-MSA	0	0.00	0.00	0.00	1.18	0.00	78.70	0.00	20.12	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Nashua NH MSA AA	368	41.26	14.97	7.77	19.25	26.54	29.62	34.63	36.16	31.07	2.56	3.18	2.81	2.74	2.13	
Limited Review:																
Manchester NH MSA AA	280	31.39	15.91	6.25	18.83	18.75	29.23	31.25	36.03	43.75	2.22	1.73	2.23	1.93	2.51	
New Hampshire Non-MSA	244	27.35	14.60	0.94	17.83	16.04	26.59	24.53	40.98	58.49	2.14	1.50	2.07	1.63	2.51	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 14.69% 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: STATE OF NEW HAMPSHIRE					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
Nashua NH MSA AA	338	34.53	14.97	7.63	19.25	19.28	29.62	24.50	36.16	48.59	15.03	12.20	14.89	9.84	19.66	
Limited Review:																
Manchester NH MSA AA	327	33.40	15.91	7.08	18.83	17.08	29.23	25.83	36.03	50.00	11.42	8.16	14.18	8.60	12.74	
New Hampshire Non-MSA	314	32.07	14.60	6.33	17.83	14.35	26.59	25.32	40.98	54.01	12.46	13.46	12.77	12.20	12.38	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 25.84% 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: STATE OF NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Nashua NH MSA AA	906	34.75	14.97	6.30	19.25	18.70	29.62	28.63	36.16	46.37	5.05	6.12	3.98	4.54	5.79	
Limited Review:																
Manchester NH MSA AA	774	29.69	15.91	3.85	18.83	16.97	29.23	24.89	36.03	54.30	4.53	4.03	4.55	3.92	4.96	
New Hampshire Non-MSA	927	35.56	14.60	5.35	17.83	11.93	26.59	22.22	40.98	60.49	5.12	7.55	4.36	4.34	5.50	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 44.30% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF NEW HAMPSHIRE			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Nashua NH MSA AA	664	46.24	85.28	60.99	82.83	10.39	6.78	11.91	7.89
Limited Review:									
Manchester NH MSA AA	500	34.82	84.89	60.40	82.40	9.40	8.20	8.30	6.57
New Hampshire Non-MSA	272	18.94	85.39	65.81	76.10	13.24	10.66	1.88	2.29

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 10.79% of small loans to businesses originated and purchased by the bank.

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Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF NEW HAMPSHIRE			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Nashua NH MSA AA	0	0.00	88.93	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Manchester NH MSA AA	0	0.00	88.32	0.00	0.00	0.00	0.00	0.00	0.00
New Hampshire Non-MSA	0	0.00	88.95	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF NEW HAMPSHIRE										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Nashua NH MSA AA	6,204	43.98	0.00	0.00	16.96	13.02	64.22	63.12	18.83	23.86	19.21	26.20	16.99	24.58	26.44	24.17	37.36	25.04	
Limited Review:																			
Manchester NH MSA AA	4,173	29.59	3.03	1.39	18.71	11.62	62.34	54.97	15.92	32.02	21.69	21.27	16.03	26.76	23.92	24.99	38.35	26.98	
New Hampshire Non-MSA	3,728	26.43	0.00	0.00	1.07	1.05	80.63	77.58	18.30	21.38	19.62	11.15	16.27	37.53	21.69	30.48	42.42	20.84	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000			
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:									
Nashua NH MSA AA	1	769	17	3,327	18	4,096	33.21	0	0
Limited Review:									
Manchester NH MSA AA	1	950	42	5,748	43	6,698	54.31	0	0
New Hampshire Non-MSA	0	0	14	1,539	14	1,539	12.48	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:																	
Nashua NH MSA AA	43.22	8	30.76	0.00	12.50	7.50	12.50	0	0	0	0	0	0	0.00	15.35	64.41	20.24
Limited Review:																	
Manchester NH MSA AA	38.41	9	34.62	22.22	11.11	44.44	22.22	0	0	0	0	0	0	2.21	16.35	62.90	18.54
New Hampshire Non-MSA	19.28	9	34.62	0.00	0.00	77.78	22.22	0	0	0	0	0	0	0.00	0.97	79.06	19.98

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW JERSEY												
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000												
MA/Assessment Area (2000):	% 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:												
Middlesex-Somerset NJ MSA	18.57	7,739	861,873	857	100,499	0	0	8	45,279	8,604	1,007,651	19.86
Newark NJ MSA AA	21.55	9,100	1,110,978	876	95,261	0	0	11	52,171	9,987	1,258,410	17.28
Limited Review:												
Atlantic NJ MSA AA	5.88	2,476	190,968	244	19,756	0	0	4	2,250	2,724	212,974	5.94
Bergen-Passaic, NJ MSA AA	18.31	7,340	957,551	1,138	132,414	0	0	5	10,050	8,483	1,100,015	23.70
Jersey City, NJ MSA AA	4.45	1,754	199,146	302	34,663	0	0	4	2,625	2,060	236,434	8.87
Monmouth NJ MSA AA	18.55	7,836	822,688	751	73,155	0	0	7	10,689	8,594	906,532	19.01
Philadelphia MSA AA	9.62	4,272	402,542	181	18,301	0	0	6	36,990	4,459	457,833	2.50
Trenton NJ MSA AA	3.07	1,330	150,483	90	11,957	0	0	4	2053	1,424	164,493	2.84

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000								
MA/Assessment Area (2000):	% of Rated Area Loans (#) in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Middlesex-Somerset NJ MSA	18.57	649	37,408	321	3,268	0	0	458	3,330	8,387	39,907	9,815	83,913	19.86
Newark NJ MSA AA	21.55	638	43,206	222	2,237	0	0	425	2,680	9,928	47,528	11,213	95,651	17.28
Limited Review:														
Atlantic NJ MSA AA	5.88	224	12,018	114	1,050	0	0	414	2,168	3,242	14,228	3,994	29,464	5.94
Bergen-Passaic, NJ MSA AA	18.31	754	57,288	265	3,018	0	0	270	3,492	9,017	43,486	10,306	107,284	23.70
Jersey City, NJ MSA AA	4.45	104	4,807	139	1,341	0	0	393	2,408	4,775	21,207	5,411	29,763	8.87
Monmouth NJ MSA AA	18.55	667	39,901	221	2,248	0	0	352	2,817	6,791	30,964	8,031	75,930	19.01
Philadelphia MSA AA	9.62	158	7,554	27	257	0	0	120	1,031	4,392	20,967	4,697	29,809	2.50
Trenton NJ MSA AA	3.07	78	5,487	32	333	0	0	39	224	1,715	8,115	1,864	14,159	2.84

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Middlesex-Somerset NJ MSA AA	3,423	19.69	0.55	0.67	9.24	13.29	63.87	64.30	26.34	21.74	4.02	6.28	5.07	4.53	2.81	
Newark NJ MSA AA	4,218	24.27	1.98	5.19	11.73	17.02	44.58	52.30	41.71	25.49	4.11	7.62	5.30	5.22	2.36	
Limited Review:																
Atlantic NJ MSA AA	812	4.67	0.75	0.37	13.64	12.44	65.06	64.66	20.55	22.54	1.99	1.75	2.24	1.89	2.32	
Bergen-Passaic, NJ MSA AA	2,689	15.47	0.79	2.08	11.01	15.54	56.56	61.25	31.64	21.12	4.14	4.58	5.01	4.88	2.52	
Jersey City, NJ MSA AA	920	5.29	0.60	0.65	10.42	13.37	59.59	64.78	29.40	20.43	5.26	4.04	4.56	6.02	4.05	
Monmouth NJ MSA AA	2,863	16.47	1.02	0.66	23.04	17.74	46.18	54.98	29.76	26.58	3.00	1.28	2.81	3.20	2.83	
Philadelphia MSA AA	1,834	10.55	2.47	0.76	6.16	4.69	56.91	63.20	34.45	31.35	1.90	0.78	1.64	2.25	1.52	
Trenton NJ MSA AA	623	3.58	3.12	4.82	12.89	6.26	49.99	48.48	34.00	40.45	2.74	0.97	0.63	2.84	3.13	

* Based on 1999 Aggregate HMDA Data Only.

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

Institution ID: 200-Fleet National Bank

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Middlesex-Somerset NJ MSA	960	18.31	0.55	0.21	9.24	5.63	63.87	57.08	26.34	37.08	12.07	8.70	6.64	10.81	17.06	
Newark NJ MSA AA	1,087	20.73	1.98	0.46	11.73	5.98	44.58	34.59	41.71	58.97	6.41	0.93	2.09	5.15	10.84	
Limited Review:																
Atlantic NJ MSA AA	419	7.99	0.75	0.48	13.64	10.02	65.06	66.11	20.55	23.15	9.38	0.00	6.15	9.37	11.52	
Bergen-Passaic, NJ MSA AA	1,159	22.11	0.79	0.17	11.01	3.11	56.56	43.31	31.64	53.41	8.80	0.99	2.56	7.36	14.64	
Jersey City, NJ MSA AA	172	3.28	0.60	1.74	10.42	9.88	59.59	58.72	29.40	29.65	8.97	18.18	3.85	9.58	9.39	
Monmouth NJ MSA AA	1,031	19.66	1.02	0.29	23.04	14.36	46.18	43.74	29.76	41.51	7.16	0.00	6.19	6.52	8.75	
Philadelphia MSA AA	271	5.17	2.47	0.37	6.16	2.21	56.91	49.82	34.45	47.60	1.66	0.00	1.18	1.40	2.20	
Trenton NJ MSA AA	144	2.75	3.12	0.69	12.89	3.47	49.99	36.81	34.00	59.03	6.34	0.00	2.04	5.12	11.18	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Middlesex-Somerset NJ MSA	3,356	17.46	0.55	0.45	9.24	6.23	63.87	61.56	26.34	31.76	5.90	4.46	5.55	6.06	5.69	
Newark NJ MSA AA	3,795	19.74	1.98	1.87	11.73	8.67	44.58	42.48	41.71	46.98	4.01	3.67	3.32	4.15	4.07	
Limited Review:																
Atlantic NJ MSA AA	1,245	6.48	0.75	0.56	13.64	8.67	65.06	65.94	20.55	24.82	5.69	6.35	4.84	5.19	7.99	
Bergen-Passaic, NJ MSA AA	3,492	18.17	0.79	0.49	11.01	7.82	56.56	49.14	31.64	42.53	5.20	4.03	3.66	4.89	6.15	
Jersey City, NJ MSA AA	662	3.44	0.60	0.00	10.42	10.73	59.59	63.44	29.40	25.68	4.14	0.00	3.88	4.36	3.90	
Monmouth NJ MSA AA	3,942	20.51	1.02	0.51	23.04	16.01	46.18	49.49	29.76	33.99	5.16	4.00	5.44	5.14	5.09	
Philadelphia MSA AA	2,167	11.27	2.47	0.46	6.16	3.05	56.91	56.07	34.45	40.38	3.83	1.05	2.97	3.86	4.00	
Trenton NJ MSA AA	563	2.93	3.12	1.07	12.89	6.93	49.99	46.54	34.00	45.47	3.99	0.80	2.03	4.42	4.16	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Newark NJ MSA AA	0	0.00	1.98	0.00	11.73	0.00	44.58	0.00	41.71	0.00	0.00	0.00	0.00	0.00	0.00	
Middlesex-Somerset NJ MSA	0	0.00	0.55	0.00	9.24	0.00	63.87	0.00	26.34	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Trenton NJ MSA AA	0	0.00	3.12	0.00	12.89	0.00	49.99	0.00	34.00	0.00	0.00	0.00	0.00	0.00	0.00	
Philadelphia MSA AA	0	0.00	2.47	0.00	6.16	0.00	56.91	0.00	34.45	0.00	0.00	0.00	0.00	0.00	0.00	
Monmouth NJ MSA AA	0	0.00	1.02	0.00	23.04	0.00	46.18	0.00	29.76	0.00	0.00	0.00	0.00	0.00	0.00	
Jersey City, NJ MSA AA	0	0.00	0.60	0.00	10.42	0.00	59.59	0.00	29.40	0.00	0.00	0.00	0.00	0.00	0.00	
Bergen-Passaic, NJ MSA AA	0	0.00	0.79	0.00	11.01	0.00	56.56	0.00	31.64	0.00	0.00	0.00	0.00	0.00	0.00	
Atlantic NJ MSA AA	0	0.00	0.75	0.00	13.64	0.00	65.06	0.00	20.55	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: NEW JERSEY				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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 Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans						
Full Review:																
Middlesex-Somerset NJ MSA	857	19.31	2.39	3.85	10.25	10.39	62.30	64.41	25.05	21.35	1.98	4.95	2.53	2.13	1.38	
Newark NJ MSA AA	876	19.73	6.80	7.08	12.95	12.56	41.93	36.87	38.28	43.49	1.15	1.61	1.59	0.99	1.17	
Limited Review:																
Atlantic NJ MSA AA	244	5.50	0.86	0.82	18.07	16.80	62.23	63.11	18.72	19.26	1.63	2.86	1.59	1.56	1.94	
Bergen-Passaic, NJ MSA AA	1,138	25.64	3.27	1.23	15.08	12.92	53.25	48.95	28.31	36.73	1.85	0.98	1.60	1.75	2.27	
Jersey City, NJ MSA AA	302	6.80	1.23	0.66	17.05	17.88	56.70	59.93	24.60	21.52	2.18	0.00	1.89	2.26	2.29	
Monmouth NJ MSA AA	751	16.92	1.49	1.46	16.04	14.51	48.46	45.67	33.99	38.35	1.66	4.04	1.48	1.57	1.85	
Philadelphia MSA AA	181	4.08	2.93	0.55	6.13	4.42	50.73	44.75	39.33	49.72	0.35	0.00	0.84	0.29	0.40	
Trenton NJ MSA AA	90	2.03	8.02	6.67	10.95	14.44	45.18	44.44	35.84	34.44	0.96	2.99	1.28	1.03	0.60	

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Middlesex-Somerset NJ MSA	0	0.00	0.44	0.00	4.50	0.00	61.33	0.00	33.73	0.00	0.00	0.00	0.00	0.00	0.00	
Newark NJ MSA AA	0	0.00	0.53	0.00	3.97	0.00	51.35	0.00	44.15	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Atlantic NJ MSA AA	0	0.00	0.20	0.00	8.20	0.00	77.00	0.00	14.60	0.00	0.00	0.00	0.00	0.00	0.00	
Bergen-Passaic, NJ MSA AA	0	0.00	0.73	0.00	6.15	0.00	56.68	0.00	36.36	0.00	0.00	0.00	0.00	0.00	0.00	
Jersey City, NJ MSA AA	0	0.00	0.00	0.00	11.27	0.00	50.70	0.00	36.62	0.00	0.00	0.00	0.00	0.00	0.00	
Monmouth NJ MSA AA	0	0.00	0.13	0.00	11.85	0.00	47.99	0.00	40.03	0.00	0.00	0.00	0.00	0.00	0.00	
Philadelphia MSA AA	0	0.00	0.83	0.00	3.39	0.00	55.46	0.00	40.31	0.00	0.00	0.00	0.00	0.00	0.00	
Trenton NJ MSA AA	0	0.00	2.15	0.00	4.31	0.00	47.69	0.00	45.85	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Middlesex-Somerset NJ MSA	3,423	19.69	15.60	20.00	19.79	39.38	27.19	21.51	37.42	19.11	2.02	4.22	2.80	1.59	1.10	
Newark NJ MSA AA	4,218	24.27	20.05	10.68	17.75	34.76	23.61	26.92	38.60	27.64	1.62	3.54	2.51	1.45	1.01	
Limited Review:																
Atlantic NJ MSA AA	812	4.67	18.11	9.92	19.24	32.02	24.17	23.76	38.48	34.30	1.46	1.88	2.75	1.53	0.98	
Bergen-Passaic, NJ MSA AA	2,689	15.47	18.58	5.82	18.93	25.46	23.58	31.62	38.91	37.10	1.40	1.66	2.05	1.40	1.10	
Jersey City, NJ MSA AA	920	5.29	22.91	1.80	16.23	15.32	21.11	33.78	39.75	49.10	1.48	0.60	1.89	1.57	1.40	
Monmouth NJ MSA AA	2,863	16.47	18.33	9.03	18.83	30.18	24.47	23.89	38.37	36.90	1.38	1.64	1.77	1.43	1.14	
Philadelphia MSA AA	1,834	10.55	16.13	6.12	17.00	22.96	25.23	29.85	41.64	41.07	0.44	0.30	0.23	0.56	0.52	
Trenton NJ MSA AA	623	3.58	18.87	17.67	18.20	28.84	24.03	15.35	38.90	38.14	1.18	0.72	1.46	0.82	1.38	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 64.43% 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: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement 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:																
Middlesex-Somerset NJ MSA	960	18.31	15.60	10.69	19.79	19.94	27.19	26.95	37.42	42.42	8.19	5.65	6.32	6.62	11.89	
Newark NJ MSA AA	1,087	20.73	20.05	7.29	17.75	15.60	23.61	20.99	38.60	56.12	4.19	3.03	2.85	2.88	6.18	
Limited Review:																
Atlantic NJ MSA AA	419	7.99	18.11	6.58	19.24	21.00	24.17	26.65	38.48	45.77	7.54	5.45	8.82	6.79	7.79	
Bergen-Passaic, NJ MSA AA	1,159	22.11	18.58	5.34	18.93	11.80	23.58	22.11	38.91	60.75	6.19	3.83	4.17	4.61	8.71	
Jersey City, NJ MSA AA	172	3.28	22.91	11.61	16.23	25.89	21.11	24.11	39.75	38.39	5.98	9.80	10.79	3.98	5.03	
Monmouth NJ MSA AA	1,031	19.66	18.33	7.02	18.83	14.03	24.47	24.35	38.37	54.61	5.03	4.77	3.53	4.86	5.69	
Philadelphia MSA AA	271	5.17	16.13	7.41	17.00	17.04	25.23	28.89	41.64	46.67	0.71	0.80	0.81	0.64	0.69	
Trenton NJ MSA AA	144	2.75	18.87	7.22	18.20	11.34	24.03	28.87	38.90	52.58	4.37	0.84	3.78	4.00	6.11	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 33.09% 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: NEW JERSEY					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Middlesex-Somerset NJ MSA	3,356	17.46	15.60	9.25	19.79	21.69	27.19	29.13	37.42	39.93	2.48	2.57	2.30	2.63	2.45	
Newark NJ MSA AA	3,795	19.74	20.05	5.50	17.75	17.48	23.61	27.43	38.60	49.60	1.53	1.16	1.45	1.50	1.63	
Limited Review:																
Atlantic NJ MSA AA	1,245	6.48	18.11	7.50	19.24	15.17	24.17	27.08	38.48	50.24	3.54	5.03	3.81	3.80	3.17	
Bergen-Passaic, NJ MSA AA	3,492	18.17	18.58	4.37	18.93	14.11	23.58	27.15	38.91	54.37	2.50	1.84	2.35	2.44	2.65	
Jersey City, NJ MSA AA	662	3.44	22.91	5.37	16.23	11.22	21.11	27.32	39.75	56.10	1.66	1.53	1.40	2.03	1.55	
Monmouth NJ MSA AA	3,942	20.51	18.33	6.29	18.83	17.73	24.47	26.09	38.37	49.90	2.36	3.27	2.33	2.47	2.21	
Philadelphia MSA AA	2,167	11.27	16.13	5.19	17.00	18.08	25.23	27.69	41.64	49.04	1.08	0.48	1.04	1.17	1.14	
Trenton NJ MSA AA	563	2.93	18.87	3.64	18.20	16.36	24.03	23.64	38.90	56.36	1.60	0.78	2.00	1.77	1.52	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 64.35% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW JERSEY			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Middlesex-Somerset NJ MSA AA	857	19.31	83.24	60.91	78.18	10.27	11.55	1.98	2.11
Newark NJ MSA AA	876	19.73	83.89	64.38	80.71	9.93	9.36	1.15	1.31
Limited Review:									
Atlantic NJ MSA AA	244	5.50	85.25	67.21	83.20	11.07	5.74	1.63	1.93
Bergen-Passaic, NJ MSA AA	1,138	25.64	83.08	60.63	77.50	11.34	11.16	1.85	1.95
Jersey City, NJ MSA AA	302	6.80	83.28	59.27	77.81	10.93	11.26	2.18	2.23
Monmouth NJ MSA AA	751	16.92	85.49	64.98	81.09	11.72	7.19	1.66	1.77
Philadelphia MSA AA	181	4.08	83.99	57.46	76.80	14.92	8.29	0.35	0.38
Trenton NJ MSA AA	90	2.03	84.55	63.33	77.78	12.22	10.00	0.96	0.88

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 4.10% 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: NEW JERSEY									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Middlesex-Somerset NJ MSA	0	0.00	91.22	0.00	0.00	0.00	0.00	0.00	0.00
Newark NJ MSA AA	0	0.00	91.92	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Atlantic NJ MSA AA	0	0.00	88.40	0.00	0.00	0.00	0.00	0.00	0.00
Bergen-Passaic, NJ MSA AA	0	0.00	90.69	0.00	0.00	0.00	0.00	0.00	0.00
Jersey City, NJ MSA AA	0	0.00	94.37	0.00	0.00	0.00	0.00	0.00	0.00
Monmouth NJ MSA AA	0	0.00	91.46	0.00	0.00	0.00	0.00	0.00	0.00
Philadelphia MSA AA	0	0.00	88.00	0.00	0.00	0.00	0.00	0.00	0.00
Trenton NJ MSA AA	0	0.00	92.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: NEW JERSEY																		
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Full Review:																		
Middlesex-Somerset NJ MSA	9,815	17.74	1.40	1.03	14.60	14.92	62.18	61.50	21.81	22.56	19.42	27.08	17.95	35.51	24.06	21.11	38.57	16.30
Newark NJ MSA AA	11,213	20.27	8.18	5.59	21.24	17.44	40.77	41.68	29.80	35.28	23.79	23.13	15.93	34.37	19.30	21.53	40.98	20.97
Limited Review:																		
Atlantic NJ MSA AA	3,994	7.22	3.34	3.46	16.82	16.22	63.43	61.19	16.41	18.23	22.92	17.61	15.84	32.28	20.41	30.43	40.83	19.69
Bergen-Passaic, NJ MSA AA	10,306	18.63	3.48	1.11	18.31	11.83	54.94	54.92	23.27	32.12	23.05	18.28	16.15	32.51	20.61	24.62	40.19	24.60
Jersey City, NJ MSA AA	5,411	9.78	1.99	1.35	16.78	17.34	60.09	61.26	21.15	19.92	25.97	15.40	14.41	44.45	18.86	23.80	40.77	16.35
Monmouth NJ MSA AA	8,031	14.51	2.22	1.07	25.15	18.74	46.25	48.51	26.38	31.68	23.20	17.27	16.55	33.43	20.49	26.20	39.76	23.10
Philadelphia MSA AA	4,697	8.49	4.61	2.34	8.43	5.22	57.05	58.95	29.90	33.40	19.09	9.68	14.90	43.48	21.25	32.32	44.75	14.52
Trenton NJ MSA AA	1,864	3.37	6.15	3.97	16.06	12.29	48.00	45.01	29.78	38.73	22.69	18.62	17.11	36.42	20.16	23.30	40.04	21.66

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: NEW JERSEY									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Middlesex-Somerset NJ MSA	1	4,905	33	7,480	34	5,946	6.76	0	0
Newark NJ MSA AA	11	10,422	92	18,052	103	28,474	32.37	0	0
Limited Review:									
Atlantic NJ MSA AA	1	639	16	303	17	737	0.84	0	0
Bergen-Passaic, NJ MSA AA	0	0	25	1,041	25	1,041	1.18	0	0
Jersey City, NJ MSA AA	1	2,125	23	17,900	24	20,025	22.76	0	0
Monmouth NJ MSA AA	0	0	22	771	22	771	0.88	0	0
Philadelphia MSA AA	2	8,710	19	9,735	21	18,445	20.97	0	0
Trenton NJ MSA AA	4	8,666	45	3,866	49	12,532	14.25	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
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:																	
Middlesex-Somerset NJ MSA	19.86	32	18.18	3.13	18.75	46.88	31.25	1	1	0	0	0	0	1.53	14.13	61.52	22.48
Newark NJ MSA AA	17.28	27	15.34	11.11	11.11	37.04	40.74	0	0	0	0	0	0	8.71	21.48	39.20	30.57
Limited Review:																	
Atlantic NJ MSA AA	5.94	17	9.66	0.00	23.53	64.71	11.76	0	0	0	0	0	0	3.24	16.36	63.56	16.83
Bergen-Passaic, NJ MSA AA	23.70	34	19.32	0.00	11.76	38.24	50.00	0	0	0	0	0	0	4.18	18.73	52.23	24.82
Jersey City, NJ MSA AA	8.87	11	6.25	0.00	18.18	72.73	9.09	0	0	0	0	0	0	2.38	17.09	60.77	19.74
Monmouth NJ MSA AA	19.01	38	21.59	0.00	21.05	52.63	26.32	0	1	0	-1	0	0	2.14	21.19	46.97	29.54
Philadelphia MSA AA	2.50	8	4.55	0.00	0.00	50.00	50.00	0	0	0	0	0	0	5.33	8.93	54.80	30.88
Trenton NJ MSA AA	2.84	9	5.11	11.11	22.22	44.44	22.22	1	0	0	0	+1	0	6.87	15.87	43.89	32.69

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NEW YORK												
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000												
MA/Assessment Area (2000):	% 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:												
Albany NY MSA AA	7.01	4,306	261,033	1,265	110,396	2	40	17	25,434	5,590	396,903	13.56
Nassau-Suffolk NY MSA AA	34.74	24,257	2,610,350	3,410	333,606	0	0	25	119,151	27,692	3,063,107	29.14
New York City NY MSA AA	28.16	18,496	2,556,594	3,818	501,629	0	0	134	521,568	22,448	3,579,791	27.04
Syracuse NY MSA AA	4.23	2,704	134,366	667	62,764	1	200	0	0	3,372	197,330	5.48
Limited Review:												
Buffalo NY MSA AA	6.66	4,342	221,101	957	80,112	3	156	4	9,610	5,306	310,979	7.60
Dutchess County NY MSA AA	0.92	665	58,548	69	6,029	0	0	0	0	734	64,577	0.27
Elmira NY MSA AA	0.28	207	8,435	14	888	0	0	0	0	221	9,323	0.10
Jamestown NY MSA AA	1.19	835	28,688	115	6,868	1	11	0	0	951	35,567	0.67
New York Non-MSA Areas	5.80	3,890	176,868	730	57,066	2	130	2	75	4,624	234,139	2.55
Newburgh NY MSA AA	2.10	1,421	122,960	249	22,321	1	30	0	0	1,671	145,311	5.38
Rochester NY MSA AA	6.28	4,085	254,103	911	64,311	2	44	8	5,818	5,006	324,276	5.39
Utica NY MSA AA	2.64	1,641	66,742	444	38,034	15	1,347	3	250	2,103	106,373	2.81

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1998 to June 30, 2001.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: STATE OF NEW YORK						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
	% of Rated Area Loans (#)in MA/AA*	Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Optional Product Line**		Total Optional Loans		% of Rated Area Deposits (#) in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
MA/Assessment Area (2000):															
Full Review:															
Albany NY MSA AA	7.01	594	27,480	266	2,359	0	0	521	3,967	8,897	39,587	10,278	73,393	13.56	
Nassau-Suffolk NY MSA AA	34.74	2,741	223,831	1,027	10,633	0	0	2,208	19,438	29,122	135,474	35,098	389,376	29.14	
New York City NY MSA AA	28.16	1,453	123,325	847	9,393	0	0	2,826	18,838	46,437	219,902	51,563	371,458	27.04	
Syracuse NY MSA AA	4.23	332	14,711	243	2,032	0	0	193	1,212	5,536	23,476	6,304	41,431	5.48	
Limited Review:															
Buffalo NY MSA AA	6.66	590	26,875	390	3,360	0	0	418	2,672	8,923	38,544	10,321	71,451	7.60	
Dutchess County NY MSA AA	0.92	51	2,903	22	180	0	0	29	152	1,299	6,319	1,401	9,554	0.27	
Elmira NY MSA AA	0.28	22	859	8	63	0	0	1	2	451	2,001	482	2,925	0.10	
Jamestown NY MSA AA	1.19	105	3,853	88	703	0	0	64	686	1,861	7,599	2,118	12,841	0.67	
New York Non-MSA Areas	5.80	338	14,159	376	3,099	0	0	536	3,519	8,789	38,350	10,039	59,127	2.55	
Newburgh NY MSA AA	2.10	184	9,971	118	1,088	0	0	229	1,526	2,679	11,733	3,210	24,318	5.38	
Rochester NY MSA AA	6.28	484	22,370	322	2,679	0	0	245	1,437	7,853	35,274	8,904	61,760	5.39	
Utica NY MSA AA	2.64	231	10,236	200	1,692	0	0	179	1,348	4,141	17,453	4,751	30,729	2.81	

* Loan Data as of December 31, 2000. Rated area refers to either the state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is From January 01, 1998 to December 31, 2000.

*** Deposit Data as of June 30, 2000. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Albany NY MSA AA	759	4.11	0.88	0.40	15.25	7.25	59.44	60.08	24.44	32.28	1.61	0.00	1.25	1.73	1.57	
Nassau-Suffolk NY MSA AA	6,935	37.52	0.04	0.06	11.81	18.89	68.73	67.80	19.42	13.24	4.10	7.69	4.88	4.17	3.12	
New York City NY MSA AA	7,493	40.54	2.00	4.66	7.82	11.05	29.17	33.36	61.00	50.79	2.48	3.41	3.32	2.99	2.09	
Syracuse NY MSA AA	422	2.28	1.37	0.71	9.24	4.74	61.93	53.79	27.46	40.76	1.16	0.00	0.57	1.23	1.24	
Limited Review:																
Buffalo NY MSA AA	693	3.75	3.21	1.15	12.70	11.40	54.51	53.68	29.58	33.77	1.48	0.69	1.92	1.59	1.25	
Dutchess County NY MSA AA	154	0.83	1.50	0.65	8.81	6.49	73.20	76.62	16.48	16.23	1.27	1.20	0.71	1.32	1.36	
Elmira NY MSA AA	15	0.08	0.49	6.67	6.43	0.00	67.64	73.33	25.44	20.00	0.49	0.00	0.00	0.67	0.26	
Jamestown NY MSA AA	82	0.44	0.90	3.66	8.06	10.98	84.12	80.49	6.93	4.88	1.76	5.88	2.54	1.81	0.00	
New York Non-MSA Areas	613	3.32	0.02	0.00	4.79	6.53	70.52	73.90	24.67	19.58	2.25	0.00	3.69	2.60	1.27	
Newburgh NY MSA AA	402	2.18	1.22	2.49	8.97	7.71	55.02	49.25	34.79	40.55	1.96	3.03	2.06	1.95	1.91	
Rochester NY MSA AA	731	3.96	2.47	1.37	12.67	9.99	59.50	55.81	25.36	32.83	1.12	1.08	1.11	0.99	1.38	
Utica NY MSA AA	183	0.99	0.23	0.00	10.62	6.56	63.58	57.92	25.57	35.52	2.06	0.00	2.23	1.74	2.67	

* Based on 1999 Aggregate HMDA Data Only.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Albany NY MSA AA	951	6.24	0.88	0.42	15.25	12.93	59.44	60.88	24.44	25.76	10.51	8.00	8.88	10.90	10.63	
Nassau-Suffolk NY MSA AA	5,885	38.64	0.04	0.00	11.81	8.16	68.73	68.97	19.42	22.87	21.54	0.00	9.67	21.77	34.71	
New York City NY MSA AA	2,944	19.33	2.00	1.87	7.82	6.05	29.17	24.49	61.00	67.49	6.62	1.14	1.69	5.81	12.31	
Syracuse NY MSA AA	773	5.08	1.37	0.39	9.24	7.89	61.93	63.00	27.46	28.72	9.81	3.57	8.86	9.79	10.38	
Limited Review:																
Buffalo NY MSA AA	1,141	7.49	3.21	1.49	12.70	7.80	54.51	54.34	29.58	36.37	10.27	2.92	4.50	10.89	14.65	
Dutchess County NY MSA AA	120	0.79	1.50	0.00	8.81	7.50	73.20	73.33	16.48	19.17	5.99	0.00	9.38	5.48	7.20	
Elmira NY MSA AA	48	0.32	0.49	0.00	6.43	0.00	67.64	60.42	25.44	39.58	3.80	0.00	0.00	3.54	5.59	
Jamestown NY MSA AA	326	2.14	0.90	1.23	8.06	3.99	84.12	88.65	6.93	6.13	20.76	8.33	17.39	21.68	12.50	
New York Non-MSA Areas	1,270	8.34	0.02	0.00	4.79	4.96	70.52	75.59	24.67	19.45	14.83	0.00	13.04	14.27	18.16	
Newburgh NY MSA AA	305	2.00	1.22	1.64	8.97	8.20	55.02	47.21	34.79	42.95	11.57	16.67	8.62	12.33	10.96	
Rochester NY MSA AA	888	5.83	2.47	0.34	12.67	13.51	59.50	60.92	25.36	25.23	7.41	1.43	4.96	7.19	12.00	
Utica NY MSA AA	579	3.80	0.23	0.00	10.62	5.70	63.58	77.20	25.57	16.93	13.78	0.00	10.88	15.95	9.09	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Albany NY MSA AA	2,596	7.83	0.88	0.50	15.25	10.17	59.44	58.74	24.44	30.59	7.92	3.15	6.92	7.64	9.18	
Nassau-Suffolk NY MSA AA	11,437	34.51	0.04	0.06	11.81	8.71	68.73	71.50	19.42	19.72	8.08	5.56	5.30	8.40	9.06	
New York City NY MSA AA	8,059	24.32	2.00	3.02	7.82	7.54	29.17	25.61	61.00	63.71	4.41	4.61	3.52	4.35	4.57	
Syracuse NY MSA AA	1,509	4.55	1.37	0.99	9.24	5.90	61.93	57.46	27.46	35.65	6.63	3.73	5.21	6.59	7.25	
Limited Review:																
Buffalo NY MSA AA	2,508	7.57	3.21	1.04	12.70	6.10	54.51	54.94	29.58	37.92	6.34	1.20	2.93	6.89	7.35	
Dutchess County NY MSA AA	391	1.18	1.50	0.77	8.81	5.63	73.20	74.42	16.48	19.18	3.51	2.04	1.98	3.72	3.32	
Elmira NY MSA AA	144	0.43	0.49	0.00	6.43	10.42	67.64	64.58	25.44	25.00	4.61	0.00	4.04	4.74	4.66	
Jamestown NY MSA AA	427	1.29	0.90	0.00	8.06	5.62	84.12	83.84	6.93	10.54	10.53	0.00	7.32	10.52	16.10	
New York Non-MSA Areas	2,007	6.06	0.02	0.00	4.79	4.88	70.52	72.15	24.67	22.97	9.20	0.00	12.06	9.04	9.21	
Newburgh NY MSA AA	714	2.15	1.22	1.12	8.97	4.20	55.02	50.00	34.79	44.68	6.15	0.97	4.01	6.31	6.69	
Rochester NY MSA AA	2,466	7.44	2.47	0.85	12.67	8.88	59.50	60.42	25.36	29.85	5.60	1.21	4.15	5.83	6.21	
Utica NY MSA AA	879	2.65	0.23	0.00	10.62	5.12	63.58	66.44	25.57	28.44	9.17	0.00	5.36	9.46	9.86	

* Based on 1999 Aggregate HMDA Data Only.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF NEW YORK					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Syracuse NY MSA AA	0	0.00	1.37	0.00	9.24	0.00	61.93	0.00	27.46	0.00	0.00	0.00	0.00	0.00	0.00	
New York City NY MSA AA	0	0.00	2.00	0.00	7.82	0.00	29.17	0.00	61.00	0.00	0.00	0.00	0.00	0.00	0.00	
Nassau-Suffolk NY MSA AA	0	0.00	0.04	0.00	11.81	0.00	68.73	0.00	19.42	0.00	0.00	0.00	0.00	0.00	0.00	
Albany NY MSA AA	0	0.00	0.88	0.00	15.25	0.00	59.44	0.00	24.44	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Utica NY MSA AA	0	0.00	0.23	0.00	10.62	0.00	63.58	0.00	25.57	0.00	0.00	0.00	0.00	0.00	0.00	
Rochester NY MSA AA	0	0.00	2.47	0.00	12.67	0.00	59.50	0.00	25.36	0.00	0.00	0.00	0.00	0.00	0.00	
Newburgh NY MSA AA	0	0.00	1.22	0.00	8.97	0.00	55.02	0.00	34.79	0.00	0.00	0.00	0.00	0.00	0.00	
New York Non-MSA Areas	0	0.00	0.02	0.00	4.79	0.00	70.52	0.00	24.67	0.00	0.00	0.00	0.00	0.00	0.00	
Jamestown NY MSA AA	0	0.00	0.90	0.00	8.06	0.00	84.12	0.00	6.93	0.00	0.00	0.00	0.00	0.00	0.00	
Elmira NY MSA AA	0	0.00	0.49	0.00	6.43	0.00	67.64	0.00	25.44	0.00	0.00	0.00	0.00	0.00	0.00	
Dutchess County NY MSA AA	0	0.00	1.50	0.00	8.81	0.00	73.20	0.00	16.48	0.00	0.00	0.00	0.00	0.00	0.00	
Buffalo NY MSA AA	0	0.00	3.21	0.00	12.70	0.00	54.51	0.00	29.58	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 1999 Aggregate HMDA Data Only.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by 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: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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 Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans						
Full Review:																
Albany NY MSA AA	1,265	10.00	6.29	6.96	16.88	17.55	52.67	51.15	23.92	24.19	3.08	4.81	3.68	2.79	3.32	
Nassau-Suffolk NY MSA AA	3,410	26.96	0.15	0.12	14.26	14.22	65.49	68.06	20.07	17.57	2.37	2.94	2.40	2.53	1.97	
New York City NY MSA AA	3,818	30.18	6.97	5.79	15.77	18.96	22.84	24.17	51.94	47.35	1.02	0.93	1.32	1.04	0.91	
Syracuse NY MSA AA	667	5.27	7.79	8.10	13.34	12.14	55.03	52.32	23.79	27.29	2.76	3.79	2.93	2.48	3.12	
Limited Review:																
Buffalo NY MSA AA	957	7.57	4.68	5.43	14.72	13.69	49.03	47.96	30.92	32.81	1.88	2.01	1.95	1.81	1.97	
Dutchess County NY MSA AA	69	0.55	6.56	5.80	12.71	17.39	66.65	62.32	14.08	14.49	0.46	0.69	0.30	0.50	0.30	
Elmira NY MSA AA	14	0.11	4.26	0.00	23.32	21.43	51.83	50.00	20.57	28.57	0.25	0.00	0.59	0.00	0.65	
Jamestown NY MSA AA	115	0.91	9.50	3.48	10.68	10.43	71.53	82.61	8.29	3.48	1.80	1.54	0.48	2.23	0.70	
New York Non-MSA Areas	730	5.77	0.01	0.00	7.86	5.75	66.83	63.97	25.30	30.27	2.46	0.00	2.90	2.49	2.57	
Newburgh NY MSA AA	249	1.97	2.56	1.20	16.88	12.85	49.10	57.43	31.46	28.51	1.39	0.00	1.18	1.91	0.90	
Rochester NY MSA AA	911	7.20	5.15	5.60	14.94	17.23	53.48	57.19	24.41	17.89	1.83	2.15	2.35	2.09	0.97	
Utica NY MSA AA	444	3.51	3.05	2.70	19.58	20.72	53.73	56.53	22.83	18.24	3.64	5.56	4.23	3.53	3.47	

* Based on 1999 Aggregate Small Business Data Only.

** 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 (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF NEW YORK						Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA AA	2	7.41	0.25	0.00	23.25	100.00	58.13	0.00	18.36	0.00	0.00	0.00	0.00	0.00	0.00
Nassau-Suffolk NY MSA AA	0	0.00	0.00	0.00	18.70	0.00	66.10	0.00	15.15	0.00	0.00	0.00	0.00	0.00	0.00
New York City NY MSA AA	0	0.00	1.50	0.00	4.54	0.00	17.74	0.00	75.90	0.00	0.00	0.00	0.00	0.00	0.00
Syracuse NY MSA AA	1	3.70	0.42	0.00	5.19	0.00	72.95	100.00	21.44	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Buffalo NY MSA AA	3	11.11	0.36	0.00	4.28	0.00	64.88	100.00	30.48	0.00	0.00	0.00	0.00	0.00	0.00
Dutchess County NY MSA AA	0	0.00	0.22	0.00	12.04	0.00	73.55	0.00	14.19	0.00	0.00	0.00	0.00	0.00	0.00
Elmira NY MSA AA	0	0.00	0.00	0.00	6.35	0.00	69.05	0.00	24.60	0.00	0.00	0.00	0.00	0.00	0.00
Jamestown NY MSA AA	1	3.70	0.99	0.00	0.59	0.00	95.45	100.00	2.97	0.00	0.00	0.00	0.00	0.00	0.00
New York Non-MSA Areas	2	7.41	0.00	0.00	4.59	0.00	80.19	0.00	15.22	100.00	0.10	0.00	0.00	0.00	1.75
Newburgh NY MSA AA	1	3.70	0.31	0.00	4.39	0.00	52.66	100.00	42.63	0.00	0.00	0.00	0.00	0.00	0.00
Rochester NY MSA AA	2	7.41	0.61	0.00	10.87	0.00	72.58	100.00	15.94	0.00	0.40	0.00	0.00	0.50	0.00
Utica NY MSA AA	15	55.56	0.13	0.00	2.21	0.00	79.74	80.00	17.79	20.00	1.28	0.00	0.00	1.36	0.00

* Based on 1999 Aggregate Small Farm Data Only.

** 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 (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF NEW YORK					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Albany NY MSA AA	759	4.11	17.71	8.18	18.97	19.05	25.51	31.25	37.81	41.52	1.61	0.99	1.22	2.10	1.56	
Nassau-Suffolk NY MSA AA	6,935	37.52	16.36	6.56	19.26	23.53	26.30	30.00	38.08	39.91	1.81	1.93	1.63	1.57	2.10	
New York City NY MSA AA	7,493	40.54	24.98	2.18	15.22	12.77	18.24	26.20	41.56	58.86	1.13	0.89	1.20	1.14	1.13	
Syracuse NY MSA AA	422	2.28	18.48	5.51	18.00	21.76	24.65	27.55	38.87	45.18	1.26	0.98	0.88	1.20	1.57	
Limited Review:																
Buffalo NY MSA AA	693	3.75	19.56	9.83	18.17	30.11	24.00	29.20	38.27	30.86	1.74	1.54	1.83	2.09	1.46	
Dutchess County NY MSA AA	154	0.83	16.73	3.09	19.15	20.62	28.13	37.11	35.99	39.18	0.85	0.00	0.63	1.06	0.91	
Elmira NY MSA AA	15	0.08	18.75	7.69	18.82	0.00	23.45	53.85	38.98	38.46	0.48	1.19	0.00	0.67	0.49	
Jamestown NY MSA AA	82	0.44	19.40	13.33	18.10	29.33	23.68	26.67	38.82	30.67	1.92	5.33	2.44	2.01	1.24	
New York Non-MSA Areas	613	3.32	16.96	4.42	17.65	20.68	23.35	30.72	42.04	44.18	2.25	0.90	2.36	2.79	2.11	
Newburgh NY MSA AA	402	2.18	17.67	2.07	17.38	10.34	25.13	29.66	39.82	57.93	0.79	0.48	0.31	0.49	1.23	
Rochester NY MSA AA	731	3.96	18.75	9.04	18.35	30.32	24.95	23.43	37.95	37.21	1.16	0.86	0.86	1.31	1.39	
Utica NY MSA AA	183	0.99	18.32	7.51	18.96	19.08	24.04	33.53	38.68	39.88	2.49	2.01	2.74	2.22	2.64	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 55.19% 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: STATE OF NEW YORK					Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					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:																
Albany NY MSA AA	951	6.24	17.71	12.28	18.97	22.21	25.51	27.03	37.81	38.48	7.96	8.73	8.52	7.75	7.65	
Nassau-Suffolk NY MSA AA	5,885	38.64	16.36	8.72	19.26	20.62	26.30	29.93	38.08	40.73	18.60	16.11	19.14	17.14	20.35	
New York City NY MSA AA	2,944	19.33	24.98	5.03	15.22	11.92	18.24	24.19	41.56	58.86	5.32	1.71	3.78	5.64	7.58	
Syracuse NY MSA AA	773	5.08	18.48	8.26	18.00	21.81	24.65	30.53	38.87	39.41	8.41	7.35	7.12	9.51	8.51	
Limited Review:																
Buffalo NY MSA AA	1,141	7.49	19.56	10.76	18.17	21.31	24.00	26.16	38.27	41.77	9.06	7.98	8.17	9.01	10.02	
Dutchess County NY MSA AA	120	0.79	16.73	4.62	19.15	21.54	28.13	18.46	35.99	55.38	2.58	1.35	2.94	1.52	3.65	
Elmira NY MSA AA	48	0.32	18.75	5.26	18.82	26.32	23.45	26.32	38.98	42.11	3.01	0.00	4.10	0.83	4.44	
Jamestown NY MSA AA	326	2.14	19.40	6.78	18.10	23.05	23.68	31.86	38.82	38.31	19.50	18.60	18.80	20.67	19.17	
New York Non-MSA Areas	1,270	8.34	16.96	8.17	17.65	19.83	23.35	27.92	42.04	44.08	12.95	13.36	11.36	13.02	13.58	
Newburgh NY MSA AA	305	2.00	17.67	7.52	17.38	16.81	25.13	25.22	39.82	50.44	8.54	12.12	10.94	7.41	7.84	
Rochester NY MSA AA	888	5.83	18.75	10.46	18.35	23.86	24.95	28.87	37.95	36.82	6.08	5.18	5.53	6.02	6.88	
Utica NY MSA AA	579	3.80	18.32	10.54	18.96	21.87	24.04	30.82	38.68	36.78	12.38	17.97	13.93	13.04	10.16	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 27.47% 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: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance 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:																
Albany NY MSA AA	2,596	7.83	17.71	7.62	18.97	17.64	25.51	26.74	37.81	48.00	5.57	5.95	5.09	5.38	5.82	
Nassau-Suffolk NY MSA AA	11,437	34.51	16.36	6.98	19.26	21.43	26.30	31.43	38.08	40.16	5.45	5.56	5.33	5.29	5.63	
New York City NY MSA AA	8,059	24.32	24.98	2.92	15.22	10.15	18.24	23.42	41.56	63.50	2.27	2.04	2.25	2.20	2.31	
Syracuse NY MSA AA	1,509	4.55	18.48	6.75	18.00	19.91	24.65	28.16	38.87	45.18	5.21	4.94	5.10	5.83	4.93	
Limited Review:																
Buffalo NY MSA AA	2,508	7.57	19.56	6.62	18.17	21.53	24.00	28.41	38.27	43.44	4.96	3.78	5.44	5.21	4.80	
Dutchess County NY MSA AA	391	1.18	16.73	3.65	19.15	17.52	28.13	25.55	35.99	53.28	1.63	1.56	1.34	1.42	1.90	
Elmira NY MSA AA	144	0.43	18.75	7.45	18.82	19.15	23.45	35.11	38.98	38.30	2.86	2.56	1.16	3.39	3.36	
Jamestown NY MSA AA	427	1.29	19.40	5.33	18.10	17.24	23.68	30.41	38.82	47.02	9.62	13.11	7.83	10.80	9.27	
New York Non-MSA Areas	2,007	6.06	16.96	5.73	17.65	18.81	23.35	26.97	42.04	48.49	7.90	7.92	8.39	8.25	7.55	
Newburgh NY MSA AA	714	2.15	17.67	7.57	17.38	18.38	25.13	23.51	39.82	50.54	3.83	5.95	5.82	3.60	3.15	
Rochester NY MSA AA	2,466	7.44	18.75	7.89	18.35	20.38	24.95	28.66	37.95	43.07	3.84	3.73	3.93	3.73	3.90	
Utica NY MSA AA	879	2.65	18.32	7.14	18.96	14.61	24.04	27.11	38.68	51.14	8.20	8.99	7.13	8.26	8.38	

* Based on 1999 Aggregate HMDA Data Only.

** As a percentage of loans with borrower income information available. No information was available for 49.13% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF NEW YORK			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000					
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:										
Albany NY MSA AA	1,265	10.00	85.52	64.58	81.66	10.83	7.51	3.08	3.37	
Nassau-Suffolk NY MSA AA	3,410	26.96	84.77	64.55	80.29	10.82	8.89	2.37	2.58	
New York City NY MSA AA	3,818	30.18	81.73	58.91	75.48	11.18	13.33	1.02	1.05	
Syracuse NY MSA AA	667	5.27	85.56	61.17	82.01	10.19	7.80	2.76	2.94	
Limited Review:										
Buffalo NY MSA AA	957	7.57	84.35	66.04	82.13	11.08	6.79	1.88	2.56	
Dutchess County NY MSA AA	69	0.55	86.56	66.67	79.71	11.59	8.70	0.46	0.42	
Elmira NY MSA AA	14	0.11	87.71	85.71	92.86	7.14	0.00	0.25	0.50	
Jamestown NY MSA AA	115	0.91	85.75	73.91	89.57	7.83	2.61	1.80	2.70	
New York Non-MSA Areas	730	5.77	86.06	72.47	85.48	8.63	5.89	2.46	2.60	
Newburgh NY MSA AA	249	1.97	87.25	70.68	80.72	11.65	7.63	1.39	1.62	
Rochester NY MSA AA	911	7.20	86.73	71.68	88.47	7.14	4.39	1.83	2.24	
Utica NY MSA AA	444	3.51	86.01	67.79	82.66	9.46	7.88	3.64	3.77	

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 6.31% 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: STATE OF NEW YORK			Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000				
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:									
Albany NY MSA AA	2	7.41	93.58	100.00	100.00	0.00	0.00	0.00	0.00
Nassau-Suffolk NY MSA AA	0	0.00	92.17	0.00	0.00	0.00	0.00	0.00	0.00
New York City NY MSA AA	0	0.00	89.43	0.00	0.00	0.00	0.00	0.00	0.00
Syracuse NY MSA AA	1	3.70	91.37	100.00	0.00	100.00	0.00	0.00	0.00
Limited Review:									
Buffalo NY MSA AA	3	11.11	90.15	66.67	100.00	0.00	0.00	0.00	0.00
Dutchess County NY MSA AA	0	0.00	91.40	0.00	0.00	0.00	0.00	0.00	0.00
Elmira NY MSA AA	0	0.00	95.24	0.00	0.00	0.00	0.00	0.00	0.00
Jamestown NY MSA AA	1	3.70	95.64	100.00	100.00	0.00	0.00	0.00	0.00
New York Non-MSA Areas	2	7.41	93.04	0.00	100.00	0.00	0.00	0.10	0.00
Newburgh NY MSA AA	1	3.70	90.28	100.00	100.00	0.00	0.00	0.00	0.00
Rochester NY MSA AA	2	7.41	91.89	100.00	100.00	0.00	0.00	0.40	0.44
Utica NY MSA AA	15	55.56	95.97	100.00	66.67	33.33	0.00	1.28	1.35

* Based on 1999 Aggregate Small Business Data Only.

** 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 - 2001).

**** 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS		Geography: STATE OF NEW YORK										Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000							
MA/Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Albany NY MSA AA	10,278	7.11	3.18	1.42	19.78	14.20	56.27	58.58	20.76	25.73	22.68	18.36	16.60	34.36	20.56	25.22	40.15	22.06	
Nassau-Suffolk NY MSA AA	35,098	24.29	0.08	0.08	14.84	13.91	67.61	69.22	17.46	16.78	20.75	20.85	17.30	37.14	23.06	21.72	38.89	20.30	
New York City NY MSA AA	51,563	35.69	12.14	8.04	18.77	15.13	30.20	32.14	38.86	44.34	27.08	17.34	13.80	32.41	16.99	27.42	42.14	22.82	
Syracuse NY MSA AA	6,304	4.36	5.96	2.28	15.52	10.56	55.83	58.34	22.69	28.79	23.61	16.92	15.91	34.92	20.19	27.47	40.29	20.69	
Limited Review:																			
Buffalo NY MSA AA	10,321	7.14	7.20	3.64	17.58	12.83	50.73	53.50	24.48	29.95	25.23	19.41	15.25	35.10	18.66	26.08	40.86	19.40	
Dutchess County NY MSA AA	1,401	0.97	4.56	1.71	12.82	10.56	69.53	71.16	12.96	16.56	20.98	8.90	16.83	31.71	22.72	43.19	39.47	16.20	
Elmira NY MSA AA	482	0.33	2.35	0.41	13.29	9.13	63.79	63.28	20.57	27.18	23.58	14.59	16.35	46.57	19.12	28.76	40.95	10.09	
Jamestown NY MSA AA	2,118	1.47	3.61	1.32	11.09	9.02	78.55	82.20	6.75	7.46	24.41	17.35	15.45	34.41	19.14	26.54	41.01	21.70	
New York Non-MSA A	10,039	6.95	0.02	0.00	6.24	5.93	69.53	70.82	24.21	23.25	21.98	14.37	15.62	33.57	19.50	30.05	42.90	22.01	
Newburgh NY MSA	3,210	2.22	3.18	1.78	15.33	13.74	52.32	53.68	29.17	30.81	22.37	19.16	15.29	30.36	21.76	30.92	40.57	19.55	
Rochester NY MSA AA	8,904	6.16	5.93	1.86	15.78	15.60	57.07	59.67	21.21	22.80	23.14	18.11	16.33	36.81	20.62	25.47	39.92	19.60	
Utica NY MSA AA	4,751	3.29	1.37	0.59	19.86	11.83	57.94	65.86	20.83	21.66	23.98	19.40	16.01	32.18	19.32	25.53	40.68	22.89	

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of Households is based on the 1990 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: STATE OF NEW YORK									
Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:									
Albany NY MSA AA	0	0	124	3,353	124	3,353	1.06	0	0
Nassau-Suffolk NY MSA AA	0	0	110	21,346	110	21,346	67.19	0	0
New York City NY MSA AA	1	3,493	304	50,385	305	53,878	16.97	0	0
Syracuse NY MSA AA	0	0	35	687	35	687	0.22	0	0
Limited Review:									
Buffalo NY MSA AA	0	0	87	7,708	87	7,708	2.43	0	0
Dutchess County NY MSA AA	0	0	10	4,941	10	4,941	1.56	0	0
Elmira NY MSA AA	0	0	1	4	1	4,258	1.34	0	0
Jamestown NY MSA AA	0	0	15	41	15	41	0.01	0	0
New York Non-MSA Areas	0	0	52	9,111	52	9,111	2.87	0	0
Newburgh NY MSA AA	0	0	22	9,321	22	9,321	2.94	0	0
Rochester NY MSA AA	0	0	90	5,521	90	5,521	1.74	0	0
Utica NY MSA AA	0	0	37	5,346	37	5,346	1.68	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 2000									
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:																	
Albany NY MSA AA	13.56	40	10.34	4.76	19.05	45.24	28.57	1	5	0	0	0	-4	2.85	18.83	56.04	22.09
Nassau-Suffolk NY MSA AA	29.14	88	21.67	0.00	14.77	68.18	17.05	3	12	0	-2	-6	-1	0.37	14.57	67.46	17.28
New York City NY MSA AA	27.04	77	18.97	3.90	14.29	37.66	44.16	5	2	+1	+1	+2	-1	14.32	20.00	29.69	35.62
Syracuse NY MSA AA	5.48	23	5.67	4.35	17.39	43.48	34.78	2	1	0	0	0	+1	6.51	13.83	56.02	23.31
Limited Review:																	
Buffalo NY MSA AA	7.60	39	9.61	7.69	23.08	46.15	23.08	0	0	0	0	0	0	6.91	16.40	50.37	25.68
Dutchess County NY MSA AA	0.27	3	0.74	33.33	33.33	33.33	0.00	1	0	0	0	0	+1	3.71	11.95	67.99	14.59
Elmira NY MSA AA	0.10	1	0.25	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.57	12.68	61.71	21.17
Jamestown NY MSA AA	0.67	8	1.97	25.00	0.00	75.00	0.00	0	0	0	0	0	0	2.81	10.49	78.63	8.07
New York Non-MSA Areas	2.55	15	3.69	0.00	13.33	46.67	40.00	2	1	0	0	+1	0	0.02	6.40	69.01	24.33
Newburgh NY MSA AA	5.38	54	13.30	0.00	9.26	66.67	24.07	0	1	0	0	-1	0	4.49	14.38	51.42	29.70
Rochester NY MSA AA	5.39	35	8.62	0.00	28.57	51.43	17.14	2	1	0	0	+1	0	5.95	15.17	56.64	21.99
Utica NY MSA AA	2.81	21	5.17	0.00	19.05	66.67	14.29	0	0	0	0	0	0	0.99	19.01	57.40	21.79

