

# LARGE BANK

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

**Public Disclosure**

**September 1, 2003**

**Community Reinvestment Act  
Performance Evaluation**

**KeyBank, National Association  
Charter Number: 14761**

**127 Public Square  
Cleveland, Ohio 44114**

**Office of the Comptroller of the Currency**

**Large Bank Division  
250 "E" Street, SW  
Washington, D. C. 20219**

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

# Table of Contents

**OVERALL CRA RATING .....2**

**DEFINITIONS AND COMMON ABBREVIATIONS .....3**

**DESCRIPTION OF INSTITUTION.....6**

**SCOPE OF THE EVALUATION .....7**

**FAIR LENDING REVIEW .....11**

**STATE RATING.....12**

**STATE OF PORTLAND/VANCOUVER, OR-WA ..... 12**

**STATE OF ALASKA RATING .....15**

**STATE OF COLORADO RATING .....18**

**STATE OF IDAHO RATING .....21**

**STATE OF INDIANA RATING .....24**

**STATE OF MAINE RATING.....27**

**STATE OF MICHIGAN RATING .....30**

**STATE OF NEW YORK RATING .....33**

**STATE OF OHIO RATING .....37**

**STATE OF OREGON RATING .....41**

**STATE OF UTAH RATING .....44**

**STATE OF VERMONT RATING .....47**

**STATE OF WASHINGTON RATING.....50**

**APPENDIX A: SCOPE OF EXAMINATION .....A-1**

**APPENDIX B: SUMMARY OF STATE RATINGS .....B-1**

**APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS .....C-1**

**APPENDIX D: TABLES OF PERFORMANCE DATA .....D-1**

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “**Outstanding.**”

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

Performance Levels	KeyBank National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	<b>X</b>	<b>X</b>	<b>X</b>
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:

- Key’s overall lending performance in HMDA loans and small loans to businesses is very good and overall lending performance rises to excellent with the substantial volume of community development lending in every rated area;
- Key’s geographic distribution of HMDA loans and small loans to businesses is excellent in seven of the rated areas, representing 70 percent of the bank’s deposits, good in four rated areas or 26 percent, and adequate in one rated area or 4 percent.
- Key’s distribution of HMDA loans and small loans to businesses among borrowers of different income levels is excellent in nine of the rated areas, representing 49 percent of the bank’s deposits, and good in four of the rated areas, or 51 percent. Key has an excellent level of qualified investments in every state it serves; and
- Key has excellent accessibility to its branches and ATMs in low- and moderate-income areas for people of different income levels in six states representing 66 percent of its bank-wide deposits and good accessibility in the remaining seven states.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

KeyBank National Association (Key) is a wholly owned subsidiary of KeyCorp. Both are headquartered in Cleveland, Ohio. At the end of 2004, KeyCorp was the eighteenth largest commercial bank holding company with \$91 billion in assets. KeyCorp owned one other national bank, KeyBank USA, NA, which it merged into KeyBank National Association in October 2004. This transaction occurred after the evaluation period and none of the loans or investments KeyBank USA, NA made was considered in Key's performance. KeyCorp has several nonbank subsidiaries that: make community development loans and investments; underwrite, sell and clear securities; provide investment advice and discount brokerage services; and make commercial loans. At the bank's request, we considered two bank and three holding company affiliates that attribute loans, investments and services to Key's effort to help meet community credit needs.

Key is an interstate bank that provides a full range of retail and commercial financial products and services in: Alaska, Colorado, Idaho, Indiana, Maine, Michigan, New York, Ohio, Oregon, Utah, Vermont and Washington. Key's most significant presences are in New York, Ohio and Washington. The bank operates 932 branches and 1,517 automated teller machines (ATMs), primarily in metropolitan communities. As of December 31, 2002, Key reported total assets of \$75 billion, total loans of \$54 billion, a loan-to-deposit ratio of 110 percent and Tier I capital of \$5 billion. Loans represent 72 percent of the bank's assets and are broken out as follows: real estate – 42 percent (20 percent are secured by one-to-four family residential properties); commercial – 29 percent; lease financing receivables – 16 percent; consumer – 11 percent; agriculture – 1 percent; and other – 1 percent.

To determine Key's size and capacity for CRA evaluation purposes, we considered operating subsidiaries of the bank. None of Key's operating subsidiaries contributes to the bank's CRA performance. There are no significant financial, legal or other types of barriers limiting Key's ability to lend, invest or provide services in its communities.

The last CRA examination is dated March 1, 1999. The bank received an "outstanding" rating at that review. Refer to Appendix A for identification of the affiliates that contributed to the bank's performance during this evaluation period and a listing of the communities in which Key operates.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act. The evaluation period for home mortgage loans and small loans to businesses was January 1, 1999 through December 31, 2002. We analyzed community development loans, qualified investments and community development services from the date of the last evaluation through August 31, 2003. The bank makes some agricultural loans and loans on multi-family properties. However, both of these loan types represent less than one percent of total loans and we did not analyze them due to the very small volumes.

### Data Integrity

As part of this evaluation, we tested the accuracy of the publicly available, bank-reported data we used to evaluate HMDA loans, small loans to businesses and community development loans. We tested statistical samples of HMDA and small loans to businesses and found them to be substantially accurate, with isolated errors that did not impact our analyses. We tested judgmental samples of community development loans and investments and found them to qualify for consideration in our analyses. We note bank management's system of identifying and aggregating qualifying community development loans and investments has improved greatly since the last evaluation period.

### Selection of Areas for Full-Scope Review

We selected one metropolitan assessment area (AA) in each state where the bank has an office for a full-scope review. A full-scope review considers performance context, quantitative and qualitative factors. The metropolitan AA selected for the full-scope review had the largest percentage of Key's deposits in that state. The other metropolitan and the non-urban AAs in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Each of the states had non-urban communities in which Key has an office. In each state, these non-urban communities were aggregated as one for analytical purposes. In addition, Key has offices in one multi-state metropolitan area and it received a full-scope review. Refer to the "Description of the Institution's Operations" section under each State Rating for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the multi-state metropolitan area rating and state ratings. Three of the rated areas carried the greatest weight in our conclusions because they represent the bank's most significant markets in terms of deposit concentrations. In order they are the State of Ohio, the State of New York and the State of Washington. Together these three states contain over 77 percent of the bank's total deposits.

The state ratings are based primarily on those areas that received full-scope reviews, but proportional consideration is given to the bank's performance in areas receiving limited-scope reviews. Refer to the "Conclusions for Areas Receiving Limited-Scope Reviews" section under each test in each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

### Community Contacts

We personally contacted several community development organizations that work with housing, small business and economic development issues in Key's full-scope Cleveland/Lorain/Elyria AA to learn about local credit needs. We reviewed write-ups of contacts with community-based organizations in Key's other full-scope AAs that were made by examiners from the OCC and the other regulatory agencies. The most consistently voiced need is finding and funding affordable housing stock for LMI individuals. Community representatives also informed us of the need for small business loan programs to provide funds for new and existing businesses that foster job creation and retention. Many contacts



stressed the need for consumer credit and homebuyer counseling for individuals and financial education for current and prospective small business owners.

### **Other Information**

*Assessment Areas* – We determined that all of the bank’s AAs consisted of whole geographies, met the requirements of the regulation, and did not arbitrarily exclude any low- or moderate-income areas.

*Inside/Outside Ratio* – We considered the volume of HMDA and small loans to businesses Key made inside its AAs as a positive factor in our evaluation of lending performance. We analyzed the volume of bank originations within its AAs at both the state and bank level. Our conclusions were based solely on bank originations and did not include affiliates for these loan products.

Key originated 93.6 percent of its HMDA loans and 94.8 percent of its small loans to businesses within Key’s AAs across the country. We did not identify any products or states where the inside/outside ratio was a concern.

#### *Flexible Loan Programs and Financial Products* –

Key focuses its outreach on LMI families and LMI geographies. The bank’s primary mortgage loan program to help LMI borrowers achieve homeownership is the HomeAssist Product. HomeAssist enables the borrower to purchase a home with 3% down, which may be obtained as a gift. Flexible underwriting guidelines are used in order to accommodate as many borrowers as possible. In addition, the product does not require borrowers to obtain Private Mortgage Insurance (PMI). This decreases the loan costs and permits more borrowers to move into home ownership. In addition to the flexible lending criteria these borrowers are provided with homebuyer counseling as part of the home purchase process.

In addition to HomeAssist, the bank provides several other mortgage products for the LMI market. These include loans through the Federal National Mortgage Association (FNMA), Veteran’s Affairs (VA), the Federal Housing Agency (FHA), plus mortgage products offered through state Rural Housing Agencies and programs through the State Housing Agencies of Maine, New York, Oregon, Idaho, Colorado, Vermont and Washington. These loan programs, like Key’s internal product, help LMI applicants find affordable mortgage financing with features such as flexible underwriting criteria including higher debt-to-income ratios, lower closing costs, and the use of non-standard credit histories.

Key has a variety of loan and savings products tailored to the needs of the LMI community. One unique product Key offers is the Loan Assist program. The program gives a client the opportunity to repair damaged credit or build credit. The client takes out a loan for a set amount and the proceeds of the loan are deposited into a bank account. The client makes regular payments over the loan period and at the end of the period receives the proceeds from the account. During this evaluation period Key originated \$1 million of loans through this product.

In order to ensure access to credit Key reaches the needs of small businesses through its branch network and Business Banking and Community Development Banking divisions. Key is an active participant in the SBA loan program through all of these areas. Business Banking has a division dedicated to SBA lending. The Community Development Lending group has a SBA loan packager who works with its lenders to focus on SBA lending across the country in LMI areas.

#### *Factors Considered in our Analysis Under the Performance Tests -*

Lending Test - Bank management stated the opportunities to make HMDA loans, small loans to businesses and community development loans are reasonable in its full-scope AAs.

Based on the volume of HMDA loans and small loans to businesses we reviewed bank-wide, HMDA loans represented 40 percent of the weight and small loans to businesses represented 60 percent of

the weight given to the bank's primary lending performance. Within the HMDA products, home improvement mortgage loans, a principal retail product for the bank, received the heaviest consideration. Home purchase and home refinance mortgage loans received secondary consideration. We gave equal weighting to geographic and borrower distribution of the bank's mortgage and small business lending. In most markets the bank had a significant volume of community development loans that reflected its positive responsiveness to the credit needs of the community. Community development lending was a positive factor in every rating area and in some states justified raising the Lending Test rating. These situations are described in the conclusions for each rated area.

We did not analyze or draw conclusions on a particular loan product in any AA if 50 or fewer loans were made during the evaluation period. We found such an analysis did not provide meaningful information.

When we analyzed HMDA loans for distribution by the income level of the borrower, we considered the impact of poverty and the limited cash flow a low-income borrower would have to qualify for mortgage products.

Investment Test – Bank management stated the opportunity to make qualified investments is reasonable in all of its full-scope AAs, but two. In the Buffalo/Niagara Falls, New York AA, opportunities are low because of the lack of a significant infrastructure among community development organizations and local governing bodies making project developments difficult. In the Burlington, Vermont AA, it has been difficult to find investments because there is a limited amount of low-income housing tax credits awarded for the State of Vermont on an annual basis. When restricted to the Burlington MSA, this figure is even smaller. In addition, the majority of projects have one statewide syndicator as their investor.

We gave equal consideration to the volume of investments and grants made in the current evaluation period and the qualified investments that had outstanding balances on the bank's books from the prior evaluation period. The bank determined it had exceeded its regulatory limit for community welfare investments during this evaluation period. The bank requested and received approval for the overinvestment from the Federal Reserve Bank of Cleveland. An overinvestment can limit the bank's ability to make future investments until outstanding investments mature. We evaluated the responsiveness of those investments to the community's identified needs. We also compared the dollar volume of qualified investments in each AA to the dollar volume of Tier I capital allocated to that AA to gauge the level of qualified investments on an AA, state-wide and bank basis.

Service Test - We gave primary consideration to Key's performance in ensuring that low- and moderate-income people and areas had reasonable access to the bank's branches and ATMs. We evaluated the impact of branch openings and closings on accessibility for low- and moderate-income people and areas. We also considered the range of products and services and the convenience of business hours in low- and moderate-income areas compared to those in middle- and upper-income areas to determine if there were differences.

Key offers two primary alternative delivery systems for the convenience of its banking customers. They are accessing bank services through a toll-free telephone number and accessing their accounts on the Internet. However, the bank does not have information on how LMI individuals or people in LMI areas have benefited from these services. Therefore, we did not place significant weight on these systems when determining the bank's level of performance under the Service Test. Management informed us they are in process of developing a record-keeping system to track and analyze customer use of the bank's alternate delivery systems.

Key uses an affiliate's membership in the Federal Home Loan Bank to sponsor and package Affordable Housing Program grant applications. A Key employee is dedicated to providing this service for all applications received from across the country. Key sponsored requests for grants totaling \$29 million, of which \$11 million was awarded to affordable housing developments.

The Neighborhood Markets Initiative was pioneered in 1998 by Social Compact to respond to two interwoven issues discouraging private investment in inner-city markets: "bad" data and negative stereotypes. Three years later, the results were a series of tested, highly effective, replicable tools for assembling dependable business-oriented market data and insightful information on inner-city markets. These market profiles, known as the Neighborhood Market Drill Down, refute the negative stereotypes surrounding the inner city and overcome market information barriers. Key has spearheaded the effort to bring this process to Cleveland. In cooperation with the City of Cleveland, community groups and foundations, the Cleveland Social Compact Initiative has the tools to analyze data from a variety of sources to quantify the hidden economy in Cleveland's inner city neighborhoods.

## Fair Lending Review

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

## State Rating

### State of Portland/Vancouver, OR-WA

CRA rating for the Portland/Vancouver, OR-WA MMA<sup>1</sup>: **Outstanding**

The lending test is rated: **Outstanding**

The investment test is rated: **Outstanding**

The service test is rated: **Outstanding**

The major factors that support this rating include:

- An excellent distribution of loan products by both geography and the income level of the borrower;
- An excellent volume of community development loans;
- An excellent level of qualified investments; and
- Excellent accessibility of the bank's deposit facilities and a good level of community development services.

### **Description of Institution's Operations in Portland/Vancouver, OR-WA MMA**

The Portland/Vancouver MMA is comprised of Clackamas, Columbia, Multnomah, Oregon and Yamill counties in Oregon and Clark County in Washington. There are 37 depository institutions in the Portland/Vancouver MMA and the top four commercial banks hold 72 percent of the area's deposits. Key's deposit market share in the MMA ranks 5<sup>th</sup> at 6.10 percent with \$1.2 billion. The bank operates 37 branches and 61 ATMs in the MMA. The Portland/Vancouver MMA has 3.03% of Key's total deposits.

Refer to the market profile for the Portland/Vancouver, OR-WA MMA in Appendix C for detailed demographics and other performance context information.

### **LENDING TEST**

The bank's performance under the Lending Test in the Portland/Vancouver MMA is rated "Outstanding."

### **Lending Activity**

Lending activity in the Portland/Vancouver MMA is adequate. The bank ranked fifth in deposit market share in Portland/Vancouver, but its lending market share for all loan products was somewhat lower than its deposit market share. With numerous lenders vying for each product, the bank had adequate volumes of home purchase and home refinance mortgage loans and good volumes of home improvement mortgage loans and small loans to businesses.

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

The geographic distribution of loan products in the Portland/Vancouver MMA is excellent. Distribution of home purchase and home improvement mortgage loans is excellent in LMI geographies. The distribution of home refinance mortgage loans is excellent in low-income geographies and good in moderate-income geographies. The geographic distribution of small loans to businesses is good in low-income geographies and excellent in moderate-income geographies.

We did not identify any geographic gaps in lending.

<sup>1</sup> This rating reflects performance within the multi-state MA. The statewide evaluations do not reflect performance in the parts of those states contained within the multi-state MA.

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

The distribution of loans among borrowers of different income levels in the Portland/Vancouver MMA is excellent. The distribution of home purchase, home improvement and home refinance mortgage loans to low-income borrowers is good. The distribution of home purchase and home improvement mortgage loans to moderate-income borrowers is excellent. The distribution of home mortgage refinance loans to moderate-income borrowers is good. The distribution of small loans to businesses with gross revenues of \$1 million or less is excellent.

### **Community Development Lending**

Community development lending had a significant, positive impact on the Lending Test rating for the MMA. The volume of community development lending in the full-scope Portland/Vancouver MMA is excellent. During the evaluation period, Key made 17 community development loans totaling \$50.9 million. This dollar volume represents 33.31 percent of the Tier 1 capital allocated to the Portland/Vancouver MMA based on its percentage of bank-wide deposits. These loans reflect a mix of purposes including affordable housing and services targeted to LMI individuals and families. One example is a \$3.7 million loan to construct 51 units of multi-family housing affordable to LMI households in Vancouver. Another example is an \$8 million line of credit to a private nonprofit corporation to provide permanent financing for affordable housing projects in the MMA.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the Portland/Vancouver MMA is rated "Outstanding."

Based on a full-scope review, Key's volume of qualified investments in the Portland/Vancouver MMA is excellent. During the evaluation period, the bank made 15 qualified investments totaling \$31.2 million for affordable housing projects. The bank also made 85 grants totaling \$385 thousand to organizations involved with community development projects or services. The bank has 29 outstanding investments from the prior period totaling \$19.5 million for affordable housing projects. Total current and prior period investments represent 33.38 percent of the Tier I capital allocated to the Portland/Vancouver MMA.

### **SERVICE TEST**

The bank's performance under the Service Test in the Portland/Vancouver MMA is rated "Outstanding."

### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the Portland/Vancouver MMA is excellent. The accessibility of branches and ATMs in low-income geographies is excellent. The accessibility of branches in moderate-income geographies is also excellent and the accessibility of ATMs is adequate. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the MMA. Branch hours are convenient. During the evaluation, the bank opened three branches and closed one in middle-income areas and closed one branch in an upper-income area. These actions did not adversely affect the accessibility of banking services in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

### **Community Development Services**

Bank employees provided a good level of community development services to the Portland/Vancouver MMA. Thirteen employees provided over 1,600 hours of financial guidance to a number of organizations serving the community development needs of LMI areas and people in the MMA. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

**Refer to Tables 1 – 15 in the Portland/Vancouver MMA section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of Alaska Rating

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

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

The major factors that support this rating include:

- An excellent geographic distribution of HMDA loans and small loans to businesses;
- A good distribution of HMDA loans and small loans to businesses among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Good accessibility of the bank’s deposit facilities and a good level of community development services.

### **Description of Institution’s Operations in the State of Alaska**

The Anchorage MSA has 40.62 percent of Key’s deposits in the State of Alaska and was chosen for a full-scope review. The remaining branches in Alaska are in non-urban areas and were aggregated together for a limited-scope review. The State of Alaska accounts for one percent or \$384.7 million of Key’s total deposits.

The Anchorage AA is comprised of the Borough of Anchorage. There are five depository institutions in the Anchorage AA and the top three commercial banks hold 91 percent of the deposits. Key’s deposit market share ranks 4<sup>th</sup> at 6.8 percent with \$156.3 million. Key operates four branches and five ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Anchorage AA.

### **LENDING TEST**

The bank’s performance under the Lending Test in the State of Alaska is rated “Outstanding.”

Based on a full-scope review, lending performance for the HMDA products and small loans to businesses in the Anchorage AA is good. A very strong volume of community development loans in the Anchorage AA raises overall lending performance to excellent. Performance in the limited-scope AA did not impact the Lending Test rating for Alaska.

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

#### **Lending Activity**

Lending activity in the full-scope Anchorage AA is good. The bank’s lending market shares are lower than its deposit market share with numerous competitors vying for home mortgage and small commercial loans. The bank’s lending market shares in home purchase and home refinance mortgage loans are adequate and the lending market shares in home improvement mortgage loans and small loans to businesses are good.



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

The overall geographic distribution of loan products in the full-scope Anchorage AA is excellent. The distribution of home purchase mortgage loans is excellent in moderate-income geographies. No home purchase mortgage loans were made in low-income geographies, which has a small percentage of both the population and owner-occupied housing units. The distribution of home refinance mortgage loans is good in low-income geographies and excellent in the moderate-income areas. The geographic distribution of small loans to businesses is excellent in low-income geographies and good in moderate-income areas. Home improvement mortgage loans were not analyzed because of small volume.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Anchorage AA is good. The distribution of home purchase loans to low- and moderate-income borrowers is excellent, while the distribution of home refinance loans to low- and moderate-income borrowers is adequate. Home improvement loans were not analyzed because of small volume. The distribution of small loans to businesses with revenues of \$1 million or less was good.

**Community Development Lending**

The level of community development loans in the full-scope Anchorage AA is excellent. Key made two community development loans totaling \$11 million for projects that revitalized/stabilized LMI geographies. This dollar volume represents 54.43 percent of the Tier I capital allocated to the Anchorage AA. One example is a \$4 million construction/term loan to a Native-owned corporation for the construction of a new office building. This will expand the current operations of the corporation with the purpose of ensuring the long-term profitability and financial independence of Alaskan Natives and stability of the geography.

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

The bank’s performance under the Lending Test in the non-urban Alaskan AA is not inconsistent with the bank’s overall excellent performance in the State of Alaska. Lending performance for HMDA products and small loans to businesses in the non-urban AA is good and the volume of community development lending is very strong. The bank was also given positive consideration for three community development loans made in non-urban Alaskan geographies where Key does not have an office.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in the State of Alaska is rated “Outstanding.”

Based on a full-scope review, performance in the Anchorage AA is excellent. Performance in the limited-scope AA did not impact the Investment Test rating for Alaska.

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

Key’s volume of qualified investments in the Anchorage AA is excellent. During the evaluation period, the bank made 47 grants totaling \$181 thousand to 22 organizations involved with community development projects or services. The bank also has \$1.7 million in an outstanding investment from the prior period, which supports the assigned rating. The prior investment was for affordable housing. Total current and prior period investments represent 9.25 percent of the Tier I capital allocated to the Anchorage AA.

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

The bank’s volume of qualified investments in the non-urban AA is somewhat weaker than the excellent performance noted in the Anchorage AA and is considered good. The difference in performance between the full-scope AA and the limited-scope AA did not affect the overall Investment Test rating for

the State of Alaska because of the high volume of investments in the Anchorage AA. The bank also received positive consideration for a \$2 million investment in a non-urban portion of Alaska where the bank does not have an AA.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Alaska is rated "High Satisfactory."

Based on a full-scope review, performance in the Anchorage AA is good. Performance in the limited-scope non-urban AA did not impact the Service Test rating for Alaska.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Anchorage AA is good. The bank does not have any branches or ATMs in low-income geographies where only 7.5 percent of the population lives and there are few commercial businesses. Accessibility of banking services from the three low-income tracts is adequate. The accessibility of deposit facilities in moderate-income geographies is excellent. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are very convenient. No branches were opened or closed since the last evaluation. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided a good level of community development services to the Anchorage AA. Ten employees provided over 700 hours of financial guidance to numerous organizations serving the community development needs of LMI areas and people in the Anchorage community. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on a limited-scope review, the bank's performance under the service test in the non-urban AA is not inconsistent with the bank's overall good performance under the service test in the full-scope Anchorage AA.

**Refer to Tables 1 – 15 in the Alaska section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## **State of Colorado Rating**

**CRA Rating for the State:**                    ***Outstanding***

**The lending test is rated:**                    ***Outstanding***

**The investment test is rated:**                ***Outstanding***

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

The major factors that support this rating:

- An excellent geographic distribution of loan products and a good distribution of loans among borrowers of different income levels;
- An excellent volume of community development loans;
- An excellent level of qualified investments; and
- Good accessibility of the bank’s deposit facilities and a good level of community development services.

### **Description of Institution’s Operations in the State of Colorado**

The Denver AA has 64.15 percent of Key’s deposits in the State of Colorado and was chosen for a full-scope review. The rest of Key’s Colorado deposits are located in Boulder, Colorado Springs, Fort Collins, Greeley and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Colorado accounts for 1.73% or \$674 million of Key’s total deposits.

The Denver AA is comprised of Adams, Arapahoe, Denver, Douglas and Jefferson Counties. There are 89 depository institutions in the Denver AA and the top five commercial banks hold 54 percent of the deposits. Key’s deposit market share ranks 14<sup>th</sup> at 1.44 percent with \$432.6 million. Key operates 26 branches and 45 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Denver AA.

### **LENDING TEST**

The bank’s performance under the Lending Test in the State of Colorado is rated “Outstanding.”

Based on a full-scope review, lending performance in the Denver AA is excellent. The bank’s geographic distribution of loan products is excellent, the distribution by borrower-income level is good, and a very high volume of community development loans raises overall performance to excellent. Performance in the limited-scope AAs did not impact the Lending Test rating for Colorado.

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

#### **Lending Activity**

Lending activity in the full-scope Denver AA is good. The volume of home improvement mortgage loans and small loans to businesses are strong with lending market shares that exceed the bank’s deposit market share for the MSA. The volume of home purchase and home refinance mortgage loans is lower than the bank’s deposit market share indicating adequate volume with hundreds of competitors for each of these products.

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

The overall geographic distribution of loan products in the full-scope Denver AA is excellent. The distribution of home purchase and home improvement mortgage loans and small loans to businesses is excellent in LMI geographies. The distribution of home refinance mortgage loans is excellent in low-income areas and good in moderate-income areas.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Denver AA is good. The distribution of home purchase mortgage loans to LMI borrowers is excellent. The distribution of home improvement mortgage loans is adequate with poor dispersion among low-income borrowers and excellent dispersion among moderate-income borrowers. The distribution of home refinance mortgage loans is adequate with adequate dispersion among low-income borrowers and good dispersion among moderate-income borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

### **Community Development Lending**

The level of community development loans in the full-scope Denver AA is excellent. Key made 14 community development loans totaling \$43.8 million that supported affordable housing projects. This dollar volume represents 78.21 percent of the Tier I capital allocated to the Denver AA. One example is a \$6.8 million construction loan for the rehabilitation of affordable apartments located in a moderate-income geography and the new construction of a community center and facilities for apartment residents. KeyBank partnered with a national investor that provided equity funds in the form of low-income housing tax credits..

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

The bank's performance under the lending test in the limited-scope Boulder, Colorado Springs, Fort Collins, Greeley and non-urban AAs is not inconsistent with the bank's overall excellent performance under the lending test in Colorado. Lending performance for HMDA products in the limited-scope AAs is good (HMDA loans were not analyzed in the non-urban AA due to small volume) and performance is excellent in all of the limited-scope AAs regarding small loans to businesses. The bank has strong volumes of community development lending in the Boulder and Colorado Springs AAs.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Colorado is rated "Outstanding."

Based on a full-scope review, performance in the Denver AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating for Colorado. The bank has a high percentage of qualified investments in each of its Colorado markets.

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

Key's volume of qualified investments in the Denver AA is excellent. During the evaluation period, the bank made 14 qualified investments totaling \$16.2 million which included \$12.3 million in affordable housing projects and \$3.9 million in projects that revitalize or stabilize LMI geographies. The bank also made 92 grants totaling \$284 thousand to 54 different organizations involved with community development projects or services. The bank has eight outstanding investments in the Denver AA from the prior period totaling \$3.5 million. Of this total, \$1.6 million was for affordable housing projects and \$1.9 million was for projects that revitalize or stabilize LMI geographies. Total current and prior period investments represent 35.70 percent of Tier I capital allocated to the Denver AA.

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

The bank's volume of qualified investments in the five limited-scope Colorado AAs is not inconsistent with the overall excellent performance noted in the Denver AA.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Colorado is rated "High Satisfactory."

Based on a full-scope review, performance in the Denver AA is good. Performance in the limited-scope AAs did not impact the Service Test rating for Colorado.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Denver AA is good. The accessibility of branches and ATMs in low-income geographies is excellent. The accessibility of branches and ATMs in moderate-income geographies is adequate. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are very convenient. During the evaluation period, the bank opened five branches in middle-income areas and one in an upper-income area. The bank also closed one branch in a moderate-income area. There are five branches in middle- and upper-income areas that are reasonably accessible to LMI geographies so service convenience remains adequate in moderate-income areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided a good level of community development services to the Denver AA. Fourteen employees provided almost 2,000 hours of financial guidance to a number of organizations serving the community development needs of LMI areas and people in the Denver community. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the service test in the Fort Collins AA is stronger than the bank's overall good performance in the full-scope Denver AA. In the Boulder, Colorado Springs and Greeley AAs the bank's performance is weaker than in the Denver AA. The non-urban AA does not have any LMI geographies in which to analyze branch and ATM accessibility. The difference in performance in the limited-scope AAs did not impact the bank's overall performance in Colorado due to the dominant percentage of statewide deposits in the Denver market.

**Refer to Tables 1 – 15 in the Colorado section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## **State of Idaho Rating**

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

**The service test is rated:** *Outstanding*

The major factors that support this rating include:

- An adequate geographic distribution of HMDA products and an excellent geographic distribution of small loans to businesses;
- An excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Excellent accessibility of the bank's depository facilities and a good level of community development services.

### **Description of Institution's Operations in the State of Idaho**

The Boise AA has 37.12 percent of Key's deposits in the State of Idaho and was chosen for a full-scope review. The rest of Key's Idaho deposits are located in Pocatello and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Idaho accounts for 1.49 percent or \$583.3 million of Key's total deposits.

The Boise AA is comprised of Ada and Canyon Counties. There are 20 depository institutions in the Boise AA and the top five commercial banks hold 69 percent of the deposits. Key's deposit market share ranks 6<sup>th</sup> at 5.03 percent with \$216.6 million. Key operates 12 branches and 20 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Boise AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Idaho is rated "Outstanding."

Based on a full-scope review, overall lending performance in the Boise AA is excellent with good performance in the HMDA products, excellent performance in small loans to businesses and an excellent volume of community development lending. Performance in the limited-scope AAs did not impact the Lending Test rating for Idaho.

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

#### **Lending Activity**

Lending activity in the full-scope Boise AA is good. The volume of home improvement mortgage loans and small loans to businesses are strong with lending market shares that exceed the bank's deposit market share for the MSA. The volume of home purchase and home refinance mortgage loans is lower than the bank's deposit market share indicating an adequate volume with several hundred lenders competing for these loans.

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

The overall geographic distribution of loan products in the full-scope Boise AA is good. The distribution of home purchase mortgage loans is adequate with good penetration in low-income geographies and poor penetration in moderate-income geographies. The distribution of home improvement mortgage loans is good with adequate penetration in low-income geographies and excellent penetration in moderate-income geographies. The distribution of home refinance mortgage loans is poor in LMI geographies. The distribution of small loans to businesses is excellent in low-income geographies and good in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Boise AA is excellent. The distribution of home purchase mortgage loans is excellent among LMI borrowers. The distribution of home improvement mortgage loans is excellent among low-income borrowers and good among moderate-income borrowers. The distribution of home refinance mortgage loans is poor among LMI borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

### **Community Development Lending**

The level of community development loans in the full-scope Boise AA is excellent. Key made 11 community development loans totaling \$15.3 million. This dollar volume represents 54.56 percent of the Tier I capital allocated to the Boise AA. The majority of these loans supported affordable housing projects.

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

The bank's performance under the lending test in the limited-scope Pocatello and non-urban AAs is not inconsistent with the bank's overall excellent performance under the lending test in Idaho. Lending performance for HMDA products and small loans to businesses is excellent in the Pocatello AA. Lending performance in the non-urban AA is adequate for HMDA products and good for small loans to businesses. A significant volume of community development loans in the non-urban AA raises its overall lending performance to excellent.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Idaho is rated "Outstanding."

Based on a full-scope review, performance in the Boise AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Idaho.

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

Key's volume of qualified investments in the Boise AA is excellent. During the evaluation period, the bank made 50 grants totaling \$206 thousand to organizations involved in community development projects or services. The bank has three prior period investments totaling \$1.9 million that support the assigned rating. Those investments were for affordable housing projects. Total current and prior period investments represent 7.34 percent of the Tier I capital allocated to the Boise AA.

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

The bank's volume of qualified investments in the non-urban AA is excellent and not inconsistent with the excellent performance noted in the Boise AA. The level of qualified investments in the Pocatello AA is much weaker in terms of number and volume of investments. The smaller volume of investments in Pocatello does not warrant a downgrade in the overall strong investment performance in the State, because of Pocatello's small portion of the statewide deposits.

## **SERVICE TEST**

The bank's performance under the Service Test in the State of Idaho is rated "Outstanding."

Based on a full-scope review, performance in the Boise AA is excellent. Performance in the limited-scope AAs did not impact the Service Test rating for Idaho.

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

### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Boise AA is excellent. The accessibility of branches in LMI geographies is excellent. The accessibility of ATMs is excellent in low-income geographies and adequate in moderate-income geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank opened one branch in an upper-income area. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

### **Community Development Services**

Bank employees provided a good level of community development services to the Boise AA. Nine employees provided over 1,100 hours of financial guidance to a number of organizations serving the community development needs of LMI areas and people in Boise. The services the community development organizations provide address the community's most pressing needs, including housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Pocatello and non-urban AAs is not inconsistent with the bank's overall excellent performance in the full-scope Boise AA.

**Refer to Tables 1 – 15 in the Idaho section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**



## **State of Indiana Rating**

**CRA Rating for the State:**                    ***Outstanding***

**The lending test is rated:**                    ***Outstanding***

**The investment test is rated:**                ***Outstanding***

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

The major factors that support this rating:

- A good geographic distribution of HMDA products and an adequate geographic distribution of small loans to businesses;
- An excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Good accessibility of the bank's depository facilities and a good level of community development services.

### **Description of Institution's Operations in the State of Indiana**

The Indianapolis AA has 39 percent of Key's deposits in the State of Indiana and was chosen for a full-scope review. The rest of Key's Indiana deposits are located in Bloomington, Elkhart, Kokomo, South Bend, and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Indiana accounts for 4.24 percent or \$1.7 billion of Key's total deposits.

The Indianapolis MSA is comprised of Boone, Hamilton, Johnson, Madison, Marion, Morgan and Shelby Counties. There are 50 depository institutions in the Indianapolis AA and the top five commercial banks hold 68 percent of the deposits. Key's deposit market share ranks 7<sup>th</sup> at 3.04 percent with \$645.9 million. Key operates 25 branches and 31 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Indianapolis AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Indiana is rated "Outstanding."

Based on a full-scope review, lending performance in the Indianapolis AA is excellent with an adequate geographic distribution of loan products, an excellent distribution of loans by borrower income, and an excellent volume of community development lending. In addition to the Indianapolis AA, three of the limited-scope AAs also demonstrated overall excellent performance, which supports the state rating by representing over 86 percent of Indiana's deposits.

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

#### **Lending Activity**

Lending activity in the full-scope Indianapolis AA is good. The volume of home improvement mortgage loans is strong with a lending market share that substantially exceeds the bank's deposit market share for the MSA. The volume of home purchase and home refinance mortgage loans and small loans to businesses are adequate with lower lending market shares than the bank's deposit market share. The lower volumes in these products are mitigated by the high number of lenders competing for each of these loan products.

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

The overall geographic distribution of loan products in the full-scope Indianapolis AA is adequate. The distribution of home purchase mortgage loans is excellent in low-income geographies and good in moderate-income geographies. The distribution of home improvement mortgage loans is good in low-income geographies and adequate in moderate-income geographies. The distribution of home refinance mortgage loans is good in low-income geographies and poor in moderate-income geographies. The distribution of small loans to businesses is poor in low-income geographies and adequate in moderate-geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Indianapolis AA is excellent. The distribution of all home mortgage products is excellent among LMI borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is also strong.

**Community Development Lending**

The level of community development loans in the full-scope Indianapolis AA is excellent. Key made 12 community development loans totaling \$18.3 million. This dollar volume represents 21.91 percent of the Tier 1 capital allocated to the Indianapolis AA. These loans reflect a mix of purposes for affordable housing and activities that revitalize or stabilize LMI geographies. One example is a \$10 million bond anticipation note to finance infrastructure improvements to a blighted inner-city neighborhood. The improvements are necessary to ensure the success of a project to transform the neighborhood into a healthy, mixed-income, and diverse community providing a range of housing opportunities, recreational amenities and commercial support services. Fifty-one percent of the new homes built in the neighborhood will be targeted to LMI households.

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

The bank’s performance under the lending test in the limited-scope Elkhart, Kokomo and South Bend AAs is not inconsistent with the bank’s overall excellent performance under the lending test in Indiana. Lending performance for HMDA products in the Bloomington AA was not analyzed due to small volume; performance is good with respect to small loans to businesses. Lending performance for HMDA products is good in the Elkhart and Kokomo AAs and strong in the South Bend and non-urban AAs. Lending performance in small loans to businesses is good in the Elkhart and non-urban AAs and excellent in the Kokomo and South Bend AAs. The Elkhart and South Bend AAs benefited from community development lending. The bank was also given positive consideration for one community development loan in an Indiana geography where Key does not have an office.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in the State of Indiana is rated “Outstanding.”

Based on a full-scope review, performance in the Indianapolis AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Indiana.

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

Key’s volume of qualified investments in the full-scope Indianapolis AA is excellent. During the evaluation period, the bank made seven qualified investments totaling \$5.3 million, which included \$4.3 million in affordable housing projects and \$1 million in a project to revitalize or stabilize LMI geographies. The bank made 39 grants totaling \$199 thousand to 19 different organizations involved with community development projects or services. The bank has 21 investments from the prior period totaling \$4.6 million, which included \$4.5 million in affordable housing projects and \$120 thousand in projects that revitalize or stabilize LMI geographies. In addition, four prior period statewide investments

totaling \$3 million and two current period statewide investments totaling almost \$5 million had benefits in the Indianapolis AA. Total current and prior period investments represent 12.02 percent of the Tier I capital allocated to the Indianapolis AA, exclusive of the benefit provided by the statewide investments.

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

The bank's volume of qualified investments in the limited-scope Elkhart and South Bend AAs is not inconsistent with the excellent performance noted in the Indianapolis AA. Although somewhat less in volume, the level of qualified investments in the Bloomington, Kokomo and non-urban AAs is good. The slightly lower volumes of investments in these three AAs did not affect the overall Investment Test rating for the State of Indiana because together they represent less than 25 percent of Key's statewide deposits. All of the bank's limited-scope AAs in Indiana benefited from the bank's investment in statewide projects.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Indiana is rated "High Satisfactory."

Based on a full-scope review, performance in the Indianapolis AA is good. Performance in the limited-scope AAs did not impact the Service Test rating for Indiana.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Indianapolis AA is good. The accessibility of branches and ATMs in low-income geographies is adequate and their accessibility in moderate-income geographies is good. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank closed four branches in upper-income areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided a good level of community development services to the Indianapolis AA. Fourteen employees provided almost 1,500 hours of financial guidance to a number of organizations serving the community development needs of LMI areas and people in Indianapolis. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the service test in the South Bend AA is not inconsistent with the bank's overall good performance in the full-scope Indianapolis AA. In the Elkhart and Kokomo AAs, the bank's performance is stronger because of better branch and ATM accessibility. In the Bloomington and non-urban AAs, the bank's performance is weaker due to poorer accessibility of branches and ATMs.

**Refer to Tables 1 – 15 in the Indiana section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## **State of Maine Rating**

**CRA Rating for the State:**                    ***Outstanding***

**The lending test is rated:**                    ***Outstanding***

**The investment test is rated:**                ***Outstanding***

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

The major factors that support this rating:

- An excellent geographic distribution of loan products;
- An excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Good accessibility of the bank’s depository facilities and an adequate level of community development services.

### **Description of Institution’s Operations in the State of Maine**

The Portland AA has 34.23 percent of Key’s deposits in the State of Maine and was chosen for a full-scope review. The rest of Key’s Maine deposits are located in Bangor, Lewiston/Auburn, Portsmouth, and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Maine accounts for 4.82 percent or \$1.9 billion of Key’s total deposits.

The Portland AA is comprised of Cumberland and York Counties. There are 11 depository institutions in the Portland AA. Key has deposits of \$643.6 million and a 30.23 percent deposit market share which ranks 1<sup>st</sup>. Key operates 18 branches and 32 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Portland AA.

## **LENDING TEST**

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

The bank’s performance under the Lending Test in the State of Maine is rated “Outstanding.”

Based on a full-scope review, performance in the Portland AA is excellent with an excellent geographic distribution of loan products, an excellent distribution of loans by borrower income, and an excellent volume of community development lending. Overall performance in the non-urban AA is also excellent. Together these two communities represent 89 percent of Maine’s deposits. Performance in the other limited-scope AAs did not impact the Lending Test rating for Maine.

### **Lending Activity**

Lending activity in the full-scope Portland AA is adequate. Key ranked first in deposit market share in Portland, but its lending market shares for all loan products were somewhat lower than its deposit market share. With numerous lenders vying for customers, the bank had good volumes in home improvement mortgage loans and small loans to businesses.

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

The overall distribution of loan products in the full-scope Portland AA is excellent. The distribution of home improvement mortgage loans and small loans to businesses is excellent in LMI geographies. The distribution of home purchase mortgage loans is good in low-income geographies and excellent in

moderate-income geographies. The distribution of home refinance mortgage loans is poor in low-income geographies and excellent in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Portland AA is excellent. The distribution of home purchase mortgage loans is excellent among LMI borrowers. The distribution of home improvement loans is excellent among low-income borrowers and good among moderate-income borrowers. The distribution of home refinance mortgage loans is poor among LMI borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

### **Community Development Lending**

The level of community development loans in the full-scope Portland AA is excellent. Key made eight community development loans totaling \$17.6 million. This dollar volume represents 21.09 percent of the Tier 1 capital allocated to the Portland AA. The majority of these funds were used to finance affordable housing projects. One example is a \$ 4.5 million loan to finance the construction of a 45-unit, mixed-income housing project in Portland. Other participants in the project included the Maine State Housing Authority, the City of Portland, and KeyBank, which made an equity contribution using low-income housing tax credits. Nineteen of the units will be put aside for LMI families.

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

The bank's performance under the Lending Test in the limited-scope Bangor and non-urban AAs is not inconsistent with the bank's overall excellent performance under the Lending Test in Maine. In the Bangor AA, lending performance for HMDA products is excellent, performance is good with respect to small loans to businesses, and the bank made an excellent volume of community development loans. In the non-urban AA, overall geographic and borrower distributions are excellent for all loan products and the AA benefited from several community development loans. Lending performance in the Lewiston/Auburn AA is good with excellent performance in HMDA products and good performance in small loans to businesses. No loans were analyzed in the limited-scope Portsmouth AA because of very small volumes. The bank was given positive consideration for three community development loans it made in other Maine geographies where Key does not have an office.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Maine is rated "Outstanding."

Based on a full-scope review, performance in the Portland AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Maine.

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

Key's volume of qualified investments in the full-scope Portland AA is excellent. During the evaluation period, the bank made five qualified investments totaling \$7 million, which included \$3.3 million in affordable housing projects and \$3.7 million in projects that revitalize or stabilize LMI geographies. The bank made 23 grants totaling \$333 thousand to six different organizations involved with community development projects or services. The bank has three investments from the prior period totaling \$4.1 million. The purpose of those investments was for projects that revitalize or stabilize LMI geographies. In addition, two prior period statewide investments totaling \$3.6 million and two current period statewide investments totaling \$5 million had benefits in the Portland AA. Total current and prior period investments represent 13.77 percent of the Tier I capital allocated to the Portland AA, exclusive of the benefit provided by the statewide investments.

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

The bank's volume of qualified investments in the limited-scope Bangor, Portsmouth and non-urban AAs is not inconsistent with the excellent performance noted in the Portland AA. Key's volume of investments in the Lewiston AA is good. All of the limited-scope AAs in Maine benefited from the bank's investment in statewide projects.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Maine is rated "High Satisfactory."

Based on a full-scope review, performance in the Portland AA is good. Performance in the limited-scope AAs did not impact the Service Test rating for Maine.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Portland AA is good. There is no bank branch in low-income geographies where less than four percent of the population resides and fewer than six percent of the commercial businesses are located. An ATM is located in the low-income area which mitigates the lack of a branch for making deposits and receiving cash. The accessibility of branches and ATMs is excellent in moderate-income geographies. In addition, there are two branches in a middle- and upper-income area that are reasonably close to the LMI geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. During the evaluation period, one branch was opened and closed in a moderate-income area and one branch was opened while three were closed in middle-income areas. These openings and closings did not adversely affect accessibility in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided an adequate level of community development services to the Portland AA. Ten employees provided over 900 hours of financial guidance to several organizations serving the community development needs of LMI areas and people in the Portland community. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the non-urban AA is not inconsistent with the bank's overall good performance in the full-scope Portland AA. In the Bangor and Lewiston/ Auburn AAs, the bank's performance is stronger due to better accessibility of branches and ATMs. There are no LMI geographies in the Portsmouth AA.

**Refer to Tables 1 – 15 in the Maine section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## **State of Michigan Rating**

**CRA Rating for the State:**                    ***Outstanding***

**The lending test is rated:**                    ***Outstanding***

**The investment test is rated:**                ***Outstanding***

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

The major factors that support this rating:

- An excellent geographic distribution of HMDA products and a good distribution of small loans to businesses;
- An excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Good accessibility of the bank’s depository facilities and an adequate level of community development services.

### **Description of Institution’s Operations in the State of Michigan**

The Ann Arbor AA has 77.53 percent of Key’s deposits in the State of Michigan and was chosen for a full-scope review. The rest of Key’s Michigan deposits are located in a small suburban portion of the Detroit MSA and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Michigan accounts for 1.41 percent or \$549.6 million of Key’s total deposits.

The Ann Arbor MSA is comprised of Lenawee County and 10 tracts from Livingston County. There are 26 depository institutions in the Ann Arbor AA and the top five commercial banks hold 47 percent of the deposits. Key’s deposit market share ranks 6<sup>th</sup> at 6.58 percent with \$426.1 million. Key operates 16 branches and 24 ATMs in the AA.

Note: Deposit market share includes all census tracts in Livingston County.

Refer to the market profile in Appendix C for demographic and other performance context information for the Ann Arbor AA.

### **LENDING TEST**

The bank’s performance under the Lending Test in the State of Michigan is rated “Outstanding.”

Based on a full-scope review, performance in the Ann Arbor AA is excellent with an excellent geographic distribution of loan products, an excellent distribution of loans by borrower income level, and an excellent volume of community development lending. Performance in the limited-scope AAs, which was good, did not lower the Lending Test rating for Michigan because Ann Arbor represents almost 78 percent of the state’s deposits.

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

#### **Lending Activity**

Lending activity in the full-scope Ann Arbor AA is adequate. Key’s lending market shares are somewhat below its deposit market share. With numerous lenders vying for customers, the bank had good volumes in home improvement mortgage loans and small loans to businesses.

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

The overall geographic distribution of loan products in the full-scope Ann Arbor AA is excellent. The distribution of home mortgage products is excellent in LMI geographies and the distribution of small loans to businesses is adequate in low-income geographies and excellent in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Ann Arbor AA is excellent. The distribution of home mortgage loans is excellent among LMI borrowers and to businesses with revenues of \$1 million or less.

### **Community Development Lending**

The level of community development loans in the full-scope Ann Arbor AA is excellent. Key made six community development loans totaling \$7.1 million. This dollar volume represents 12.86 percent of the Tier 1 capital allocated to the Ann Arbor AA. The majority of these loans financed the construction of affordable housing for LMI families.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Detroit and non-urban AAs is excellent in home mortgage lending. Overall performance in making small loans to businesses is good in the Detroit AA and adequate in the non-urban AA. The difference in performance in the limited-scope AAs did not affect the overall Lending Test rating because of the substantial volume of deposits in the full-scope Ann Arbor AA. The bank was given positive consideration for three community development loans totaling \$5.3 million in other Michigan geographies where Key does not have an office.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Michigan is rated "Outstanding."

Based on a full-scope review, performance in the Ann Arbor AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Michigan. The bank has a high percentage of qualified investments in each of its Michigan markets.

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

Key's volume of qualified investments in the full-scope Ann Arbor AA is excellent. During the evaluation period, the bank made five qualified investments totaling \$4.2 million for affordable housing projects. The bank made 43 grants totaling \$92 thousand to 20 different organizations involved with community development projects or services. The bank has one outstanding investment from the prior period for an affordable housing project with nominal value remaining. In addition, three prior period statewide investments totaling \$1.5 million and four current period statewide investments totaling \$11 million had benefits in the Ann Arbor AA. Total current and prior period investments represent 7.83 percent of the Tier I capital allocated to the Ann Arbor AA, exclusive of the benefit provided by the statewide investments.

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

The bank's volume of qualified investments in the two limited-scope Michigan AAs is not inconsistent with the excellent performance noted in the Ann Arbor AA. Both of the bank's limited-scope AAs in Michigan benefited from the statewide investments.



## **SERVICE TEST**

The bank's performance under the Service Test in the State of Michigan is rated "High Satisfactory."

Based on a full-scope review, performance in the Ann Arbor AA is excellent. The very poor performance in the limited-scope Detroit AA resulted in overall good performance for Michigan.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Ann Arbor AA is excellent. The accessibility of branches in LMI geographies is excellent. The accessibility of ATMs is good in low-income areas and excellent in moderate-income areas. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank closed four branches in middle-income geographies and opened one branch in an upper-income area. The opening and closings did not adversely affect accessibility in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided an adequate level of community development services to the Ann Arbor AA. Three employees provided almost 400 hours of financial guidance to several organizations serving the community development needs of LMI areas and people in Ann Arbor. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Detroit AA is much weaker than the bank's overall excellent performance in the full-scope Ann Arbor AA. The poor accessibility of branches and ATMs in Detroit resulted in an overall good rating for the State of Michigan. The non-urban AA does not have any LMI geographies.

**Refer to Tables 1 – 15 in the Michigan section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of New York Rating

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

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

The major factors that support this rating:

- A good geographic distribution of loan products;
- An excellent distribution of loan products among borrowers of different income levels;
- An overall excellent volume of community development loans;
- An overall excellent level of qualified investments; and
- Overall good accessibility of the bank's depository facilities and a good level of community development services.

### **Description of Institution's Operations in the State of New York**

The Buffalo/Niagara Falls AA has 25.63 percent of Key's deposits in the State of New York and was chosen for a full-scope review. The rest of Key's New York deposits are located in Albany, Dutchess, Glens Falls, Jamestown, New York City, Newburgh, Rochester, Syracuse, Utica/Rome, and non-urban areas. These communities were analyzed using limited-scope procedures. The State of New York accounts for 20.07 percent or \$7.8 billion of Key's total deposits.

The Buffalo/Niagara Falls MSA is comprised of Erie and Niagara Counties. There are 20 depository institutions in the Buffalo/Niagara Falls AA and the top two commercial banks hold 64 percent of the deposits. Key's deposit market share ranks 3<sup>rd</sup> at 9.11 percent with \$2 billion. Key operates 37 branches and 45 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Buffalo/Niagara Falls AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of New York is rated "Outstanding."

Based on a full-scope review, performance in the Buffalo/Niagara Falls AA is good. Lending performance in HMDA products is excellent and performance in small loans to businesses is good. The bank also provided a good volume of community development loans in the Buffalo/Niagara Falls AA. Excellent performance in eight of the ten limited-scope AAs, representing nearly 72 percent of the state's deposits, raised the overall level of New York's lending performance to excellent.

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

#### **Lending Activity**

Lending activity in the full-scope Buffalo/Niagara Falls AA is good. The bank ranked third in deposit market share in Buffalo/Niagara Falls AA and matched that rank plus had a higher lending market share percentage in home improvement mortgage loans. The bank's lending market shares in home purchase and home refinance mortgage lending were significantly lower than the deposit market share, but represented adequate volumes among hundreds of competitors. The bank's lending market share of small loans to businesses was somewhat lower than the deposit market share and represented good volume among national and local competitors.

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

The overall geographic distribution of home mortgage products and small loans to businesses in the full-scope Buffalo/Niagara Falls AA is good. The distributions of home purchase mortgage loans and small loans to businesses are adequate in low-income geographies and strong in moderate-income geographies. The distribution of home improvement mortgage loans is excellent in LMI geographies. The distribution of home refinance mortgage loans is adequate in low-income geographies and excellent in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Buffalo/Niagara Falls AA is excellent. The distribution of home purchase and home improvement mortgage loans among LMI borrowers is excellent, as is the distribution of small loans to businesses with revenues of \$1 million or less. The distribution of home refinance mortgage loans is good with a poor dispersion among low-income borrowers and an excellent dispersion among moderate-income borrowers.

### **Community Development Lending**

The level of community development loans in the full-scope Buffalo/Niagara Falls AA is good. Key made 11 community development loans totaling \$7.9 million. The dollar volume represents 3.02 percent of the Tier 1 capital allocated to the Buffalo/Niagara Falls AA. These loans reflect a mix of purposes including affordable housing, activities that revitalize/stabilize LMI geographies and support to organizations that provide services targeted to LMI individuals and families. One example is a \$1.8 million loan to finance the construction of a new manufacturing plant in a low-income geography that the manufacturer expects will result in the retention of 240 local jobs and the addition of 30 new jobs primarily occupied by LMI workers.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Albany, Dutchess County, Newburgh, New York, Rochester, Syracuse, Utica/Rome and non-urban AAs is not inconsistent with the bank's overall excellent performance under the Lending Test in New York State. In the Albany and non-urban AAs lending performance in HMDA products and small loans to businesses is excellent with an excellent volume of community development lending. In the Dutchess County, Newburgh, Syracuse and Utica/Rome AAs, lending performance for HMDA products is good and performance in small loans to businesses is excellent. In the New York and Rochester AAs, HMDA performance is excellent and performance in small loans to businesses is good. The Newburgh AA benefited from a good volume of community development loans and the volumes in Dutchess County, New York, Rochester, Syracuse and Utica/Rome are excellent. The Jamestown AA had excellent lending performance in HMDA products and good performance in making small loans to businesses. No HMDA loans were analyzed in the Glen Falls AA due to small volumes; performance in making small loans to businesses is good. No community development loans were made in the Jamestown or Glen Falls AA. The bank was given positive consideration for seven community development loans totaling \$22.4 million in other New York State geographies where Key does not have an office.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of New York is rated "Outstanding."

Based on a full-scope review, performance in the Buffalo/Niagara Falls AA is good. Strong performance in six of the limited-scope AAs, which represent 50 percent of the state's deposits, had a positive impact on the Investment Test rating in New York raising it to overall excellent performance.

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

Key's volume of qualified investments in the full-scope Buffalo/Niagara Falls AA is good. During the evaluation period, the bank made three qualified investments totaling \$5.1 million for affordable housing projects. The bank made 65 grants totaling \$605 thousand to 38 different organizations involved with community development projects or services. The bank has four outstanding investments from the prior period totaling \$2.6 million, which further support the assigned rating. The purpose of those investments was for affordable housing projects. Total current and prior period investments represent 3.2 percent of the Tier I capital allocated to the Buffalo/Niagara Falls AA.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany, Newburgh, New York, Rochester, Syracuse and Utica/Rome AAs is not inconsistent with the bank's overall excellent performance under the Investment Test in New York State. Key's volume of investments in the non-urban AA is adequate, while its volume of investments in the Dutchess and Jamestown AAs is nominal. We did not identify any investments in the Glens Falls AA. The bank also received positive consideration for three prior and five current investments totaling over \$5 million in portions of New York State where the bank does not have an AA.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of New York is rated "High Satisfactory."

Based on a full-scope review, performance in the Buffalo/Niagara Falls AA is adequate. Stronger performance in five of the limited-scope AAs, representing 61 percent of the state's deposits, had a positive impact on the Service Test rating for New York improving it to overall good performance.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Buffalo/Niagara Falls AA is adequate. There are no branches and ATMs in low-income geographies; however, branch and ATM accessibility is excellent in moderate-income geographies. There are four branches in middle- and upper-income geographies that are reasonably accessible to LMI geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank closed one branch each in a low-, moderate-, and middle-income area and two branches in upper-income areas. One branch was opened in an upper-income area. The closings did not affect accessibility in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided a good level of community development services to the Buffalo/Niagara Falls AA. Sixteen employees provided over 1,800 hours of financial guidance to a number of organizations serving the community development needs of LMI areas and people in the Buffalo MSA. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Albany, Dutchess, Rochester, Syracuse and non-urban AAs is not inconsistent with the bank's "high satisfactory" rating in the State of New York. Key's performance in the Glens Falls, Jamestown, Newburgh, New York, and Utica/Rome AAs is weaker than the performance in the state primarily due to reduced accessibility in moderate-income areas. However, the weaker performance did not have an impact on overall performance in New York State.

**Refer to Tables 1 – 15 in the New York State section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of Ohio Rating

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

**The service test is rated:** *Outstanding*

The major factors that support this rating:

- An excellent geographic distribution of loan products;
- A good distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Good accessibility of the bank's depository facilities supported by a excellent level of community development services.

### **Description of Institution's Operations in the State of Ohio**

The Cleveland/Lorain/Elyria AA has 72.61 percent of Key's deposits in the State of Ohio and was chosen for a full-scope review. The rest of Key's Ohio deposits are located in Akron, Canton, Cincinnati, Columbus, Dayton/Springfield, Hamilton/Middletown, Mansfield, Toledo, Youngstown, and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Ohio accounts for 45.89 percent or \$17.9 billion of Key's total deposits.

The Cleveland/Lorain/Elyria AA is comprised of the following counties: Ashtabula, Cuyahoga, Geauga, Lake and Lorain (partial county). There are 50 depository institutions in the Cleveland/Lorain/Elyria AA. Key has \$13 billion in deposits and a 23.20 percent deposit market share which ranks 1<sup>st</sup>. Key operates 72 branches in geographies where an income level has been assigned and two branches in geographies with no assigned income. The bank has 160 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Cleveland/Lorain/Elyria AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Ohio is rated "Outstanding."

Based on a full-scope review, lending performance for the HMDA products and small loans to businesses in the Cleveland/Lorain/Elyria AA is good. A strong volume of community development loans the bank made directly in the Cleveland/Lorain/Elyria AA and the benefit derived from statewide community development loans in the AA raise the level of performance to excellent. Performance in the limited-scope AAs did not impact the Lending Test rating for Ohio because community development lending had a positive impact on overall lending performance statewide.

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

#### **Lending Activity**

Lending activity in the full-scope Cleveland/Lorain/Elyria AA is good. Key ranked first in deposit market share in Cleveland/Lorain/Elyria, its corporate home base. Lending market shares for mortgage loans and small loans to businesses are somewhat lower than the deposit market share, but each is in the top ten percent, which indicates good volume in a highly competitive market.

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

The overall geographic distribution of loan products in the full-scope Cleveland/Lorain/Elyria AA is excellent. The distribution of home mortgage loans and small loans to businesses in LMI geographies is excellent, with bank lending in all products exceeding the comparative demographics.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Cleveland/Lorain/Elyria AA is good. The distribution of home mortgage loans among LMI borrowers is excellent. The distribution of small loans to businesses with revenues of \$1 million or less is good.

### **Community Development Lending**

The level of community development loans in the full-scope Cleveland/Lorain/Elyria AA is excellent. Key made 59 community development loans totaling \$66.1 million directly in the Cleveland//Lorain/Elyria AA and the AA received benefit from seven statewide community development loans totaling \$324 million. These loans reflect a mix of purposes including affordable housing, activities that revitalize/stabilize LMI geographies and funding organizations that provide services targeted to LMI individuals and families. One example is a \$1.5 million loan to finance the renovation of a three-story mini-mall and office building located in the heart of Cleveland's Asian neighborhood. The development of buildings in the area has attracted other Asian-owned businesses and has helped stabilize this low-income geography. Another example is a \$1.3 million loan to a local community development corporation to renovate an apartment building in a moderate-income geography in Cleveland's Ohio City neighborhood. The building will provide affordable apartments for LMI families and market rate apartments.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Canton, Cincinnati, Columbus, Dayton, Hamilton, Toledo and Youngstown AAs is not inconsistent with the bank's overall excellent performance in Ohio. These AAs demonstrated excellent lending performance in HMDA products, good performance in small loans to businesses, and an excellent volume of community development loans. Overall performance in the Akron, Mansfield, and non-urban AAs is good. All of the limited-scope AAs benefited from the seven statewide community development loans made in Ohio. The three AAs with good performance represent less than 7 percent of the state's deposits and do not impact the overall Lending Test rating.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Ohio is rated "Outstanding."

Based on a full-scope review, performance in the Cleveland/Lorain/Elyria AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Ohio.

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

Key's volume of qualified investments in the full-scope Cleveland/Lorain/Elyria AA is excellent based on the volume of current and prior investments made directly in the Cleveland AA and several large statewide investments that benefited the AA. During the evaluation period, the bank made 18 qualified investments totaling \$18.4 million, which included \$10 million in affordable housing projects and \$8.4 million in projects that revitalize or stabilize LMI geographies. The bank made 457 grants totaling \$8 million to 77 different organizations involved with community development projects or services. The bank has 42 outstanding investments from the prior period totaling \$133 million. The purpose of those investments is a mix of affordable housing projects and projects that revitalize or stabilize LMI geographies. Total current and prior period investments represent 9.46 percent of the Tier I capital allocated to the Cleveland/Lorain/Elyria AA, exclusive of the benefit provided by the statewide investments.

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

The bank's volume of qualified investments in five of the ten limited-scope Ohio AAs is not inconsistent with the excellent performance noted in the Cleveland AA; Key's volume of investments in the Cincinnati, Dayton, Toledo, Youngstown and non-urban AAs is also excellent. The volume of the bank's investments in the Akron and Columbus AAs is adequate while the volume of investments in the Canton, Hamilton and Mansfield AAs is weaker. The difference in performance between the full-scope AA and the limited-scope AAs did not affect the overall Investment Test rating for the State of Ohio because of the high volume of investments in the full-scope and limited-scope AAs with excellent performance. All of the bank's limited-scope AAs in Ohio benefited from the bank's investment in statewide projects.

## **SERVICE TEST**

The bank's performance under the Service Test in the State of Ohio is rated "Outstanding."

Based on a full-scope review, performance in the Cleveland/Lorain/Elyria AA is excellent. Good branch and ATM distributions were positively impacted by excellent provision of community development services. Performance in the limited-scope AAs did not impact the Service Test rating for Ohio.

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

### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Cleveland/Lorain/Elyria AA is good. The distribution of branches in the Cleveland/Lorain/Elyria AA is good with excellent accessibility in low-income geographies and adequate accessibility in moderate-income geographies. In addition, there are nine branches in middle- and upper-income areas that are reasonably accessible to a large cluster of moderate-income tracts in the central city. The distribution of ATMs is excellent in low-income geographies and good in moderate-income geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are very convenient. During the evaluation period, the bank closed three branches each in low-, moderate- and middle-income geographies, and two branches in upper-income geographies. The bank opened one branch in a middle-income geography and one in an upper-income geography. None of the closings or openings adversely affected the accessibility of banking services in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

### **Community Development Services**

Bank employees provided an excellent level of community development services to the Cleveland/Lorain/Elyria AA. Over 100 employees, including senior bank officers, provided over 17,000 hours of financial guidance to 50 percent of the organizations serving the community development needs of the LMI areas and people in the Cleveland MSA. The time Key employees devoted to counseling local community development organizations represents over two years of assistance during this evaluation period. Bank employees hold leadership positions in many of the organizations, including board and committee memberships. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.



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

Based on limited-scope reviews, the bank's performance under the Service Test in the non-urban AA is not inconsistent with the bank's overall excellent performance in the full-scope Cleveland/Lorain/Elyria AA. The bank's performance is good in the Dayton, Hamilton, Mansfield and Toledo AAs. In the Akron, Canton, Youngstown, Cincinnati and Columbus AAs, the bank's performance is weaker due to less accessibility of branches and ATMs. The excellent performance in the Cleveland metro and non-urban AAs dominates performance in Ohio.

**Refer to Tables 1 – 15 in the Ohio section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of Oregon Rating

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

**The service test is rated:** *Outstanding*

The major factors that support this rating:

- A good geographic distribution of loan products with adequate distribution among HMDA products and good geographic distribution of small loans to businesses;
- A good distribution of loan products among borrowers of different income levels with adequate dispersion among HMDA borrowers and excellent dispersion among small businesses;
- An excellent volume of community development lending and stronger performance in borrower and geographic distribution in two limited-scope AAs which raised the overall Lending Test rating to excellent;
- An excellent volume of qualified investments; and
- Although the accessibility of the bank's depository facilities was adequate in the full-scope AA, it was strong in the limited-scope AAs, which raised the overall Service Test rating to excellent.

### **Description of Institution's Operations in the State of Oregon**

The Eugene/Springfield AA has 25.28 percent of Key's deposits in the State of Oregon and was chosen for a full-scope review. The rest of Key's Oregon deposits are located in Medford, Salem and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Oregon accounts for 2.21 percent or \$862.6 million of Key's total deposits.

The Eugene/Springfield AA is comprised of Lane County. There are 16 depository institutions in the Eugene/Springfield AA and the top five commercial banks hold 60 percent of the deposits. Key's deposit market share ranks 6<sup>th</sup> at 8.39 percent with \$218.1 million. Key operates 8 branches and 15 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Eugene/Springfield AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Oregon is rated "Outstanding."

Based on a full-scope review, performance in the Eugene/Springfield AA is excellent. The overall geographic distribution of loan products is good, as is the distribution of loans by the income level of the borrower. A significant volume of community development loans raises performance in the full-scope AA to excellent. Additionally, strong lending performance in two of the limited-scope AAs supports the overall state rating with these three markets representing 70 percent of Oregon's deposits.

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

#### **Lending Activity**

Lending in the full-scope Eugene/Springfield AA is adequate. The bank lending market shares for all loan products were lower than its deposit market share due to significant competition in all products. The bank's market shares for mortgage loans and small loans to businesses were adequate.

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

The overall geographic distribution of loan products in the full-scope Eugene/Springfield AA is good. The distribution of mortgage loans was not analyzed in low-income geographies due to the very low volume of owner-occupied housing units. In moderate-income geographies, the bank's distribution of home purchase mortgage loans is excellent; home improvement mortgage loan distribution is adequate; and home refinance mortgage loan distribution is good. The overall distribution of small loans to businesses in LMI geographies is good, with excellent penetration in low-income geographies and adequate penetration in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels is good. The distribution of home purchase mortgage loans is excellent among LMI borrowers. The distribution of home improvement mortgage loans is poor among LMI borrowers. The distribution of home refinance mortgage loans is adequate with poor dispersion among low-income borrowers and good dispersion among moderate-income borrowers. The distribution of small loans to businesses with revenues less than \$1 million is excellent.

### **Community Development Lending**

The level of community development loans in the full-scope Eugene/Springfield AA is excellent. Key made three community development loans totaling \$9.3 million. This dollar volume represents 33.08 percent of the Tier 1 capital allocated to the Eugene/Springfield AA. These loans were used to finance affordable housing projects in the AA. One example is a \$5.8 million loan to finance the construction and permanent financing of 54 affordable apartments in a moderate-income geography in downtown Eugene.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Medford and Salem AAs is not inconsistent with the "outstanding" performance in the State of Oregon. The bank had good performance in mortgage lending and strong performance in making small loans to businesses in both the Medford and Salem AAs. The Salem AA also benefited from a good volume of community development loans. The bank's performance is weaker in mortgage lending in the non-urban AA, but good in lending to small businesses. This did not affect the bank's overall performance in the state. The bank was given positive consideration for one community development loan totaling \$1.3 million in an Oregon geography where Key does not have an office.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Oregon is rated "Outstanding."

Based on a full-scope review, performance in the full-scope Eugene/Springfield AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Oregon.

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

Key's volume of qualified investments in the Eugene/Springfield AA is excellent. During the evaluation period, the bank made three qualified investments totaling \$2.4 million for affordable housing projects. The bank made 11 grants totaling \$29 thousand to seven different organizations involved with community development projects or services. The bank has four outstanding investments from the prior period totaling \$832 thousand. The purpose of those investments was for affordable housing projects. In addition, one prior period statewide investment totaling \$731 thousand had benefits in the Eugene/Springfield AA. Total current and prior period investments represent 11.65 percent of the Tier 1 capital allocated to the Eugene/Springfield AA, exclusive of the benefit provided by the statewide investment.

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

The bank's volume of qualified investments in the limited-scope Salem AA is not inconsistent with the excellent performance in the Eugene/Springfield AA. The volume of the bank's investments in the Medford and non-urban AAs is weaker. The difference in performance between the full-scope AA and the two weaker, limited-scope AAs did not affect the overall Investment Test rating for the State of Oregon because of the high volume of investments in the Eugene/Springfield and Salem AAs. All of the bank's limited-scope AAs benefited from the statewide investment.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Oregon is rated "Outstanding."

Based on a full-scope review, performance in the Eugene/Springfield AA is adequate. Strong performance in each of the three limited-scope AAs had a significant, positive impact on the Service Test rating for Oregon raising it to overall excellent performance.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Eugene/Springfield AA is adequate. The bank does not have any branches or ATMs in low-income geographies where less than 3.5 percent of the population resides and five percent of the commercial businesses are located. The accessibility of the bank's branches and ATMs is excellent in moderate-income geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. No branches were opened or closed during the evaluation period. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Provision of community development services in the Eugene/Springfield AA is weak. One bank employee provided financial guidance to a community development organization.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Medford, Salem and non-urban AAs is stronger, because of excellent branch and ATM distributions in each community. This performance improved the bank's overall Service Test rating to excellent.

**Refer to Tables 1 – 15 in the Oregon section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## **State of Utah Rating**

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

**The service test is rated:** *Outstanding*

The major factors that support this rating:

- An excellent geographic distribution of loan products;
- A good distribution of HMDA products among borrowers of different income levels and an excellent distribution of small loans to small businesses;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Excellent accessibility of the bank's depository facilities and an excellent level of community development services.

### **Description of Institution's Operations in the State of Utah**

The Salt Lake/Ogden AA has 72.1 percent of Key's deposits in the State of Utah and was chosen for a full-scope review. The rest of Key's Utah deposits are located in Provo/Orem and non-urban areas. These communities were analyzed using limited-scope procedures. The State of Utah accounts for 1.64 percent or \$641 million of Key's total deposits.

The Salt Lake/Ogden AA is comprised of Davis, Salt Lake and Weber Counties. There are 54 depository institutions in the Salt Lake/Ogden AA and the top five commercial banks hold 87 percent of the deposits. Key's deposit market share ranks 11<sup>th</sup> at 0.6 percent or \$462.4 million. Key operates 24 branches and 34 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Salt Lake AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Utah is rated "Outstanding."

Based on a full-scope review, performance in the Salt Lake/Ogden AA is excellent. The bank's overall geographic distribution of loan products is excellent, as is the distribution of loans by borrower income level. The Salt Lake/Ogden AA also benefited from a substantial volume of community development loans. Performance in the limited scope AAs did not impact the Lending Test rating for Utah.

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

#### **Lending Activity**

Lending activity in the full-scope Salt Lake/Ogden AA is good. The bank's deposit market share is low because one state-chartered institution dominates both the state and Salt Lake/Ogden AA with over two-thirds of the total deposits. However, Key had adequate lending market shares in home purchase and home refinance mortgage loans and strong lending market shares in home improvement mortgage loans and small loans to businesses.

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

The overall geographic distribution of loan products in the full-scope Salt Lake/Ogden AA is excellent. The distribution of home purchase and home improvement mortgage loans and small loans to businesses in LMI geographies is excellent. The distribution of home refinance mortgage loans is good with excellent penetration in low-income geographies and adequate penetration in moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Salt Lake/Ogden AA is excellent. The distribution of home purchase mortgage loans is excellent with good dispersion among low-income borrowers and excellent dispersion among moderate-income borrowers. The distribution of home improvement mortgage loans is good with adequate dispersion among low-income borrowers and excellent dispersion among moderate-income borrowers. The distribution of home refinance mortgage loans is adequate with poor dispersion among low-income borrowers and adequate dispersion among moderate-income borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

**Community Development Lending**

The level of community development loans in the full-scope Salt Lake City AA is excellent. Key made 16 community development loans totaling \$25.6 million. This dollar volume represents 42.75 percent of the Tier 1 capital allocated to the Salt Lake/Ogden AA. These loans were used to finance affordable housing projects in the AA and fund projects that revitalize/stabilize LMI geographies. One example is a \$5.6 million construction loan that was used for the renovation/construction of an existing retail center in a moderate-income geography that will assist in retaining businesses in the area.

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

Based on limited-scope reviews, the bank’s lending performance in HMDA products and small loans to businesses in the Provo/Orem and non-urban AAs is good, but considered somewhat weaker than the bank’s overall excellent performance in the full-scope Salt Lake/Ogden AA. The level of community development lending in Key’s limited-scope AAs is substantial raising its overall lending performances to excellent. The bank was given positive consideration for six community development loans in other Utah geographies where Key does not have an office.

**INVESTMENT TEST**

Performance under the Investment Test in the State of Utah is rated “Outstanding.”

Based on a full-scope review, performance in the Salt Lake/Ogden AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Utah.

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

Key’s volume of qualified investments in the full-scope Salt Lake/Ogden AA is excellent. During the evaluation period, the bank made eight qualified investments totaling \$7.6 million, which included \$7.1 million for affordable housing projects and \$500 thousand for projects that revitalize or stabilize LMI geographies. The bank made 79 grants totaling \$336 thousand to 36 different organizations involved with community development projects or services. The bank has two outstanding investments from the prior period totaling \$80 thousand. Those investments funded affordable housing units and micro-loans to small businesses. Total current and prior period investments represent 13.32 percent of the Tier I capital allocated to the Salt Lake/Ogden AA.

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

The bank's volume of qualified investments in the non-urban AA is not inconsistent with the excellent performance noted in the Salt Lake/Ogden AA. The volume of investments in the Provo/Orem AA is weaker and consisted of a nominal amount of charitable donations. The difference in performance between the full-scope AA and the one weaker, limited-scope AA did not affect the overall Investment Test rating for the State of Utah because of the very high volume of investments in the Salt Lake/Ogden and non-urban AAs.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Utah is rated "Outstanding."

Based on a full-scope review, performance in the Salt Lake/Ogden AA is excellent. Performance in the limited-scope AAs did not impact the Service Test rating for Utah.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Salt Lake/Ogden AA is excellent. The accessibility of branches and ATMs is excellent in low- and moderate-income geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank closed one branch in a moderate-income area and opened four in a middle-income area and one in an upper-income area. The closure did not adversely affect accessibility of banking services in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided an excellent level of community development services in the Salt Lake/Ogden AA. Ten employees provided almost 1,200 hours of financial guidance to a number of organizations that serve the community development needs of LMI areas and people in the Salt Lake metropolitan area. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the non-urban AA is not inconsistent with the bank's overall excellent performance in the full-scope Salt Lake/Ogden AA. In the Provo/Orem AA the bank's performance is weaker because branch and ATM accessibility is considered adequate. The weaker performance did not impact the bank's overall rating because of the small portion of statewide deposits in the Provo/Orem AA.

**Refer to Tables 1 – 15 in the Utah section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of Vermont Rating

**CRA Rating for the State:** *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:

- An excellent geographic distribution of HMDA loans and an adequate geographic distribution of small loans to businesses;
- An overall excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- Although the level of qualified investments in the full-scope AA was adequate, an excellent level of qualified investments in the limited-scope AA raised overall performance to good; and
- Good accessibility of the bank's depository facilities and an adequate level of community development services.

### **Description of Institution's Operations in the State of Vermont**

The Burlington AA has 69.5 percent of Key's deposits in the State of Vermont and was chosen for a full-scope review. The rest of Key's Vermont deposits are located in non-urban areas and were analyzed using limited-scope procedures. The State of Vermont accounts for 1.15 percent or \$449.7 million of Key's total deposits.

The Burlington AA is comprised of Chittenden, Franklin and Grand Isle Counties. There are 6 depository institutions in the Burlington AA and the top three commercial banks hold 73 percent of the deposits. Key's deposit market share ranks 4<sup>th</sup> at 10.56 percent or \$268.8 million. Key operates 10 branches and 16 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Burlington AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Vermont is rated "Outstanding."

Based on a full-scope review, performance in the Burlington AA is excellent. The bank's overall geographic distribution of loan products is good, the distribution of loans by borrower income level is excellent, and the Burlington AA benefited from an excellent volume of community development loans. Performance in the limited-scope AA did not impact the Lending Test rating for Vermont.

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

#### **Lending Activity**

Lending activity in the full-scope Burlington AA is good. Lending market shares for home purchase and home refinance mortgage loans and small loans to businesses are adequate with numerous lenders competing for loans. The bank ranked first in production of home improvement mortgage loans with a lending market share triple its deposit market share.



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

The overall geographic distribution of loans products in the full-scope Burlington AA is good. The distribution of home purchase and home improvement mortgage loans is excellent in LMI geographies. The distribution of home refinance loans is good with excellent penetration in low-income geographies and adequate penetration in moderate-income geographies. The distribution of small loans to businesses is adequate in both low- and moderate-income geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans to borrowers of different income levels in the full-scope Burlington AA is excellent. The distribution of home purchase and home improvement mortgage loans is excellent among LMI borrowers. The distribution of home refinance mortgage loans is adequate with very poor dispersion among low-income borrowers and excellent dispersion among moderate-income borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

**Community Development Lending**

The level of community development loans in the full-scope Burlington AA is excellent. Key made ten community development loans totaling \$10.6 million. This dollar volume represents 30.59 percent of the Tier 1 capital allocated to the Burlington AA. These loans were used to finance affordable housing projects and revitalize/stabilize LMI geographies. One example is a \$1 million construction loan to finance the acquisition and construction of a warehouse in a moderate-income geography. This business expansion helped create ten new manufacturing jobs for LMI employees.

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

Based on a limited-scope review, the bank’s performance under the Lending Test in the non-urban AA is not inconsistent with the bank’s overall excellent performance in the full-scope Burlington AA. The bank’s lending performance in HMDA products and small loans to businesses in the limited-scope non-urban AA is good and an excellent volume of community development loans raises overall performance to excellent.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in the State of Vermont is rated “High Satisfactory.”

Based on a full-scope review, performance in the Burlington AA is adequate, based on the limited opportunities Key had to purchase low-income housing tax credits, its primary form of qualified investment. Strong performance in the limited-scope AA, which represents 40 percent of the state’s deposits, had a positive impact on the Investment Test rating in Vermont raising it to good overall performance.

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

Key’s volume of qualified investments in the full-scope Burlington AA is adequate. The bank’s investments consisted of \$74 thousand in grants to 11 different charitable organizations involved with community development projects or services. The bank has two outstanding investments from the prior period totaling \$402 thousand. The purpose of these investments was for affordable housing projects and projects that revitalize or stabilize LMI geographies. Total current and prior period investments represent 1.37 percent of the Tier I capital allocated to the Burlington AA.

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

The bank's volume of qualified investments in its non-urban AA is stronger than the adequate performance noted in the Burlington AA. Key's volume of investments in the non-urban AA is excellent. This had a positive effect on the overall Investment Test rating for the State of Vermont raising it to good.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Vermont is rated "High Satisfactory."

Based on a full-scope review, performance in the Burlington AA is good. Performance in the limited-scope AA did not impact the Service Test rating for Vermont.

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

#### **Retail Banking Services**

The accessibility of the bank's branches is excellent with excellent distribution in low-income geographies and good distribution in moderate-income geographies. The accessibility of the bank's ATMs is good with excellent distribution in low-income geographies and poor distribution in moderate-income geographies. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are convenient. During the evaluation period, the bank closed one branch in a middle-income area and one in an upper-income area. The closures did not adversely affect accessibility of banking services in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided an adequate level of community development services to the Burlington AA. Employees provided financial guidance to several organizations serving the community development needs of LMI areas and people in Burlington. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on a limited-scope review, the bank's performance under the Service Test in the non-urban AA is weaker than the bank's overall good performance in the full-scope Burlington AA. The weaker performance did not impact the overall state rating due to the smaller concentration of statewide deposits in the non-urban areas.

**Refer to Tables 1 – 15 in the Vermont section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## State of Washington Rating

**CRA Rating for the State:** *Outstanding*

**The lending test is rated:** *Outstanding*

**The investment test is rated:** *Outstanding*

**The service test is rated:** *Outstanding*

The major factors that support this rating include:

- An overall excellent geographic distribution of loan products;
- An excellent distribution of loan products among borrowers of different income levels;
- An excellent volume of community development lending;
- An excellent level of qualified investments; and
- Excellent accessibility of the bank's depository facilities and an excellent level of community development services.

### **Description of Institution's Operations in the State of Washington**

The Seattle/Bellevue/Everett AA has 46.15 percent of Key's deposits in Washington State and was chosen for a full-scope review. The rest of Key's Washington State deposits are located in Bellingham, Bremerton, Olympia, Richland/Kennewick, Tacoma, Yakima, and non-urban areas. These communities were analyzed using limited-scope procedures. Washington State accounts for 11.33 percent or \$4.4 billion of Key's total deposits.

The Seattle/Bellevue/Everett AA is comprised of King, Snohomish and Island Counties. There are 60 depository institutions in the Seattle/Bellevue/Everett AA and the top three commercial banks hold 62 percent of the deposits. Key's deposit market share ranks 4<sup>th</sup> at 5.27 percent with \$2 billion. Key operates 59 branches and 131 ATMs in the AA.

Refer to the market profile in Appendix C for demographic and other performance context information for the Seattle/Bellevue/Everett AA.

### **LENDING TEST**

The bank's performance under the Lending Test in the State of Washington is rated "Outstanding."

Based on a full-scope review, performance in the Seattle/Bellevue/Everett AA is excellent. The bank's geographic distribution of loan products is excellent as is the distribution of loans by borrower income level. The Seattle/Bellevue/Everett AA benefited from an excellent volume of community development loans. Performance in the limited-scope AAs did not impact the Lending Test rating for the State of Washington.

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

#### **Lending Activity**

Lending activity in the full-scope Seattle/Bellevue/Everett AA is good. Lending market shares for home purchase and home refinance mortgage loans are lower than the deposit market share, but adequate with numerous lenders competing for loans. The bank's lending market shares for home improvement mortgage loans and small loans to businesses are somewhat lower than the deposit market share and considered good amid strong competition.

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

The overall geographic distribution of loan products in the full-scope Seattle/Bellevue/Everett AA is excellent. The distribution of home purchase and home improvement mortgage loans is excellent in LMI geographies. The distribution of home refinance loans is adequate with poor penetration in low-income geographies and good penetration in moderate-income geographies. The distribution of small loans to businesses is excellent in LMI geographies.

We did not identify any geographic gaps in lending.

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

The overall distribution of loans among borrowers of different income levels in the full-scope Seattle/Bellevue/Everett AA is excellent. The distribution of all mortgage products is excellent among LMI borrowers. The distribution of small loans to businesses with revenues of \$1 million or less is also excellent.

### **Community Development Lending**

The level of community development loans in the full-scope Seattle/Bellevue/Everett AA is excellent. Key made thirty-eight community development loans totaling \$122.3 million. This dollar volume represents 46.28 percent of the Tier 1 capital allocated to the Seattle/Bellevue/Everett AA. These loans reflect a mix of purposes including funds for affordable housing, activities that revitalize and/or stabilize LMI geographies, and organizations that provide services targeted to LMI individuals and families. One example is a \$300 thousand increase to an existing line of credit that provides operating funds to an assisted living program in an LMI area.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bellingham, Olympia, Tacoma and non-urban AAs is not inconsistent with the bank's overall excellent performance in the full-scope Seattle/Bellevue/Everett AA. In the Bremerton, Richland/Kennewick and Yakima AAs the bank's performance is slightly weaker, but considered good, compared to its performance in the Seattle/Bellevue/Everett AA. The good performance in several of the limited-scope AAs did not negatively impact the bank's overall excellent performance. Community development loans were made in each limited-scope AA and they contributed to the overall excellent Lending Test rating for Washington State. The bank was given positive consideration for two community development loans in other Washington State geographies where Key does not have an office.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in the State of Washington is rated "Outstanding."

Based on a full-scope review, performance in the Seattle/Bellevue/Everett AA is excellent. Performance in the limited-scope AAs did not impact the Investment Test rating in Washington State.

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

Key's volume of qualified investments in the full-scope Seattle/Bellevue/Everett AA is excellent. During the evaluation period, the bank made 15 qualified investments totaling \$9.1 million, which included \$8 million for affordable housing projects and \$1.1 million for projects that revitalize or stabilize LMI geographies. The bank made 230 grants totaling \$1.5 million to 103 different organizations involved with community development projects or services. The bank has 30 outstanding investments from the prior period totaling \$13.6 million, which support the assigned rating. They funded affordable housing projects. Total current and prior period investments represent 9.16 percent of the Tier I capital allocated to the Seattle/Bellevue/Everett AA.

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

The bank's volume of current and prior period qualified investments in four of the seven limited-scope Washington State AAs is excellent and not inconsistent with the excellent performance noted in the Seattle/Bellevue/Everett AA. The volume of the bank's investments in the Bellingham AA is adequate, while the volume of investments in the Tacoma and Yakima AAs is weaker. The difference in performance between the full-scope AA and the limited-scope AAs did not affect the overall Investment Test rating for the State of Washington because of the high volume of investments in the full-scope AA and in those limited-scope AAs with excellent performance.

### **SERVICE TEST**

The bank's performance under the Service Test in the State of Washington is rated "Outstanding."

Based on a full-scope review, performance in the Seattle/Bellevue/Everett AA is excellent. Performance in the limited-scope AAs did not impact the Service Test for Washington State.

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

#### **Retail Banking Services**

The accessibility of the bank's deposit facilities in the full-scope Seattle/Bellevue/Everett AA is excellent. The accessibility of branches and ATMs in LMI geographies is excellent. The services offered at each branch are generally consistent and do not vary in a way that would inconvenience portions of the AA. Branch hours are very convenient. During the evaluation period, the bank closed two branches in moderate-income geographies and opened one. The bank also closed one branch in a middle-income geography and opened two others in middle-income geographies. The closures did not adversely affect accessibility of banking services in LMI areas. In addition to the traditional branches and ATMs, customers can access services with a toll-free telephone number. They can also access their accounts via the Internet and may apply for financial products via the Internet 24 hours a day.

#### **Community Development Services**

Bank employees provided an excellent level of community development services to the Seattle/Bellevue/Everett AA. Forty-six employees provided almost 5,700 hours of financial guidance to many organizations serving the community development needs of LMI areas and people in the Seattle metropolitan area. The services the community development organizations provide address the community's most pressing needs, including affordable housing, economic revitalization and social welfare and educational services for LMI individuals and families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Bellingham, Olympia, Richland/Kennewick and non-urban AAs is not inconsistent with the bank's overall excellent performance in the full-scope Seattle/Bellevue/Everett AA. In the Tacoma and Yakima AAs, the bank's performance is good and in the Bremerton AA, performance is adequate. Performance in these three AAs did not have an impact on the overall state rating because a substantial majority of customers benefit from excellent accessibility.

**Refer to Tables 1 – 15 in the Washington State section of Appendix D for the facts and data that support the Lending, Investment and Service Test conclusions.**

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/1999 to 12/13/2002 Investment and Service Tests and CD Loans: 01/01/999 to 08/31/2003	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
KeyBank National Association Cleveland, Ohio	Mortgage Lending, Small Business Lending, Community Development Loans, Qualified Investments and Grants, and Community Development Services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Key Community Development Corp.	Holding Company	Community Development Loans and Qualified Investments
Key Equity Capital Corp.	Bank	Community Development Services
Key Foundation	Bank and Holding Company	Qualified Investments
McDonald & Co.	Holding Company	Community Development Services

<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Examination</b>	<b>Other Information</b> (Lists counties in non-MSA areas and counties in an MSA when whole MSA was not selected.)
<b>Portland/Vancouver, OR-WA MMA #6440</b>	Full-scope	
<b>State of Alaska</b>		
Anchorage MSA #0380	Full-scope	
Alaska non-MSA	Limited-scope	Fairbanks North Star, Juneau, Kenia, Ketchikan, Kodiak Island, Matanuska-Susitna, Aleutians West (partial), Dillingham and Yakutat
<b>State of Colorado</b>		
Denver MSA #2080	Full-scope	
Boulder MSA #1125	Limited-scope	
Colorado Springs MSA #1720	Limited-scope	
Fort Collins MSA #2670	Limited-scope	
Greeley MSA #3060	Limited-scope	
Colorado non-MSA	Limited-scope	Logan and Morgan
<b>State of Idaho</b>		
Boise MSA #1080	Full-scope	
Pocatello MSA #6340	Limited-scope	
Idaho non-MSA	Limited-scope	Bingham, Bonneville, Cassia, Fremont, Gem, Jefferson, Madison, Minidoka, Payette, Power, Teton and Twin Falls
<b>State of Indiana</b>		
Indianapolis MSA #3480	Full-scope	
Bloomington MSA #1020	Limited-scope	
Elkhart MSA #2330	Limited-scope	
Kokomo MSA #3850	Limited-scope	
South Bend MSA #7800	Limited-scope	
Indiana non-MSA	Limited-scope	Kosciusko, Marshsall, Pulaski, Stark and Steuben

<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area</b>		<b>Type of Examination</b>	<b>Other Information</b> (Lists counties in non-MSA areas and counties in an MSA when whole MSA was not selected.)
<b>State of Maine</b>			
Portland MSA	# 6400	Full-scope	Cumberland (partial) and York (partial)
Bangor MSA	#0730	Limited-scope	Penobscot (partial) and Waldo (partial)
Lewiston/Auburn MSA	#4240	Limited-scope	Androscoggin (partial)
Portsmouth MSA	# 6450	Limited-scope	York (partial)
Maine non-MSA		Limited-scope	Androscoggin (partial), Cumberland (partial), Penobscot (partial), Waldo (partial), York (partial), Knox, Lincoln, Sagadahoc, Hancock, Aroostock, Franklin, Kennebec, Oxford, Piscataquis, and Sommerset
<b>State of Michigan</b>			
Ann Arbor MSA	#0440	Full-scope	Lenawee, Washtenaw, and Livingston (partial)
Detroit MSA	#2160	Limited-scope	Wayne (partial)
Michigan non-MSA		Limited-scope	St. Joseph (partial)
<b>State of New York</b>			
Buffalo/Niagara Falls MSA	#1280	Full-scope	
Albany MSA	#0160	Limited-scope	
Dutchess MSA	#2281	Limited-scope	
Glens Falls MSA	#2975	Limited-scope	
Jamestown	#3610	Limited-scope	
New York MSA	#5600	Limited-scope	
Newburgh MSA	#5660	Limited-scope	
Rochester MSA	#6840	Limited-scope	
Syracuse MSA	#8160	Limited-scope	
Utica/Rome MSA	#8680	Limited-scope	
New York non-MSA		Limited-scope	Cattaraugus, Cortland, Otsego, Columbia, Green, Sullivan, Ulster, Fulton, Clinton, Franklin, Jefferson, Lewis and St. Lawrence



<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area</b>		<b>Type of Examination</b>	<b>Other Information</b> (Lists counties in non-MSA areas and counties in an MSA when whole MSA was not selected.)
<b>State of Ohio</b>			
Cleveland/Lorain/Elyria MSA	#1680	Full-scope	Ashtabula, Cuyahoga, Geauga, Lake, Medina, and Lorain (partial)
Akron MSA	#0080	Limited-scope	
Canton MSA	#1320	Limited-scope	
Cincinnati MSA	#1640	Limited-scope	Clermont, Hamilton and Warren (partial)
Columbus MSA	#1840	Limited-scope	
Dayton MSA	#2000	Limited-scope	
Hamilton MSA	#3200	Limited-scope	
Mansfield MSA	#4800	Limited-scope	
Toledo MSA	#8400	Limited-scope	
Youngstown MSA	#9320	Limited-scope	Columbiana, Mahoning and Trumbull (partial)
Ohio non-MSA		Limited-scope	Defiance, Erie, Hancock, Huron, Ottawa, Sandusky, Seneca and Wayne
<b>State of Oregon</b>			
Eugene/Springfield MSA	#2400	Full-scope	
Medford MSA	#4890	Limited-scope	
Salem MSA	#7080	Limited-scope	
Oregon non-MSA		Limited-scope	Hood River, Josephine and Linn
<b>State of Utah</b>			
Salt Lake/Ogden MSA	#7160	Full-scope	
Provo/Ogden MSA	#6520	Limited-scope	
Utah non-MSA		Limited-scope	Box Elder, Cache, Carbon, Emery, Summit and Tooele

<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area</b>		<b>Type of Examination</b>	<b>Other Information</b> (Lists counties in non-MSA areas and counties in an MSA when whole MSA was not selected.)
<b>State of Vermont</b>			
Burlington MSA	#1305	Full-scope	Chittendon (partial), Franklin (partial) and Grand Isle (partial)
Vermont non-MSA		Limited-scope	Chittendon (partial), Franklin (partial), Grand Isle (partial), Bennington, Rutland, Washington, and Windham
<b>State of Washington</b>			
Seattle/Bellevue/Everett MSA	#7600	Full-scope	
Bellingham MSA	#0860	Limited-scope	
Bremerton MSA	#1150	Limited-scope	
Olympia MSA	#5910	Limited-scope	
Richland/Kennewick MSA	#6740	Limited-scope	
Tacoma MSA	#8200	Limited-scope	
Yakima MSA	#9260	Limited-scope	
Washington non-MSA		Limited-scope	Chelan, Clallam, Cowlitz, Douglas, Grant, Grays Harbor, Lewis, Lincoln, Mason, Pacific, San Juan, Skagit and Stevens

## Appendix B: Summary of State Ratings

<b>RATINGS FOR KEYBANK NATIONAL ASSOCIATION, CLEVELAND, OHIO</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
KeyBank, National Association	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area and States:				
Portland/Vancouver, OR-WA MMA	Outstanding	Outstanding	Outstanding	Outstanding
State of Alaska	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Colorado	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Idaho	Outstanding	Outstanding	Outstanding	Outstanding
State of Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Maine	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Michigan	Outstanding	Outstanding	High Satisfactory	Outstanding
State of New York	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Ohio	Outstanding	Outstanding	Outstanding	Outstanding
State of Oregon	Outstanding	Outstanding	Outstanding	Outstanding
State of Utah	Outstanding	Outstanding	Outstanding	Outstanding
State of Vermont	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Washington	Outstanding	Outstanding	Outstanding	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

### Portland/Vancouver, OR-WA MMA #6440

Demographic Information for Full-Scope Area: Portland/Vancouver, OR-WA MMA # 6440						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	353	2.3	20.4	58.1	18.1	1.1
Population by Geography	1,515,452	1.2	17.6	62.3	18.9	0.0
Owner-Occupied Housing by Geography	362,878	0.7	13.7	63.5	22.1	0.0
Businesses by Geography	20,315	0.0	11.6	81.0	7.4	0.0
Farms by Geography	787	0.0	3.8	87.8	8.4	0.0
Family Distribution by Income Level	397,676	17.6	18.7	25.6	38.1	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	144,514	2.1	24.9	62.7	10.3	0.0
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$36,705 = \$57,200 = 9.64%	Median Housing Value Unemployment Rate			= \$75,705 = 2.69%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Portland/Vancouver MMA is comprised of Clackamas, Columbia, Multnomah, Oregon and Yamill counties in Oregon and Clark County in Washington. The AA does not arbitrarily exclude any LMI geographies. Portland is Oregon’s largest city and contains over half of the state’s population. Vancouver is Washington’s fastest growing city, now the fourth largest. This area has experienced rapid population growth with former California residents relocating to an area with a good quality of life and more affordable living conditions.

The area traditionally depended on forestry for its economic base. However, a shift away from the traditional industries to more high tech, service and manufacturing occurred in the late 1980’s and 90’s. The major types of businesses located in the MMA are services (32.22%), retail trade (13.56%), construction (9.37%), finance, insurance & real estate (6.91%) and manufacturing (4.95%).

The difference in tax structures between Washington State and Oregon impact the economies of the two larger cities. Washington State does not have personal or corporate income tax, but does have a sales tax. Oregon has no sales tax. Wages paid in Vancouver are typically lower than in Portland because the lack of income taxes allows employers to discount wages. Retail sales in Vancouver are lower because of the easy access to tax-free sales in Oregon. Many Washington residents commute into Portland for higher paying corporate wages.

Based on community contacts conducted by the OCC and other regulators, we noted affordable housing is a key issue, as is the need for small business start-up loans.

State of Alaska

Anchorage, AK - MSA # 0380

Demographic Information for Full-Scope Area: Anchorage, AK MSA #0380						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	56	5.4	19.6	44.6	28.6	1.8
Population by Geography	226,338	7.5	19.5	42.4	30.6	0.0
Owner-Occupied Housing by Geography	43,664	2.1	11.2	45.8	40.9	0.0
Businesses by Geography	22,253	5.6	26.0	41.0	27.4	0.0
Farms by Geography	267	3.4	16.1	45.3	35.2	0.0
Family Distribution by Income Level	57,519	20.0	18.0	22.4	39.6	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,858	13.4	29.9	41.3	15.4	0.0
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$50,109					
Households Below the Poverty Level	= \$60,500					
	= 6.44%					
			Median Housing Value			= \$98,375
			Unemployment Rate			= 3.72

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Anchorage AA consists of the Anchorage Borough. The AA does not arbitrarily exclude any LMI geographies. Anchorage is the largest city in Alaska with 42 percent of the state’s population and is the center of commerce for the state. Anchorage has a shipping port, a busy international airport that is an important conduit for freight and passengers en route to Asia, an air force base and a military reservation. Anchorage is ideally situated for tourists with its proximity to the Kenai peninsula, mountain ranges, national parks, national wildlife refuges and other attractions. The major types of businesses located in the MSA are services (31.77%), retail trade (12.35%), construction (6.20%), finance, insurance & real estate (4.69%) and Transportation/Communication (4.64%). Employment by the government and the military makes up nearly 22 percent of the work force. Economic conditions are good with relatively low unemployment and poverty rates. The population is growing.

Based on community contacts conducted by the OCC and other regulators, we noted affordable housing and programs targeted at Native Americans are key issues. Bankers and community contacts stated one important demographic characteristic of the Anchorage AA is a relatively high turnover in population. The causes most often cited are the weather, relative isolation from the lower 48 states and the high percentage of military personnel who are subject to frequent transfers. The local housing market appears to be affected by this factor because of a higher than average percentage of rental units and a lower than average percentage of owner-occupied units. Nevertheless, the demand for affordable housing still outstrips the supply.

State of Colorado

Denver, CO – MSA # 2080

Demographic Information for Full-Scope Area: Denver, CO – MSA #2080						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	498	6.8	21.9	32.5	21.5	17.3
Population by Geography	1,622,980	6.9	24.0	43.3	25.8	0.0
Owner-Occupied Housing by Geography	399,963	3.7	19.9	45.2	31.2	0.0
Businesses by Geography	171,064	7.8	20.7	37.4	33.9	0.2
Farms by Geography	2,604	3.6	18.4	44.8	33.0	0.2
Family Distribution by Income Level	424,057	18.8	18.7	24.6	37.9	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	159,032	12.2	35.5	40.0	12.3	0.0
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$40,222					
Households Below the Poverty Level	= \$69,900					
	= 9.52					
			Median Housing Value			= \$89,581
			Unemployment Rate			= 2.96%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Denver AA is comprised of Adams, Arapahoe, Denver, Douglas and Jefferson Counties. The AA does not arbitrarily exclude any LMI geographies. The City of Denver is the state’s capital and the center of its economic activity. Despite its diversification, Denver’s economy is declining. Unemployment has risen and jobs are contracting in every industry. The major types of businesses located in the Denver AA are services (32.29%), retail trade (11.87%), finance, insurance & real estate (8.40%), construction (7.35%) and wholesale trade (3.99%).

The city and county of Denver has a HUD Empowerment Zone/Enterprise Community. Denver and other counties in the AA also have areas designated as Redevelopment Zones or Blighted Areas. These areas typically present greater opportunities for financial institutions for developing partnerships that encourage economic development. There are four Community Development (CD) financial institutions in the Denver AA. There are also at least five active CD corporations that work primarily with financing and technical support for small business financing needs.

Based on community contacts completed by the OCC and other regulatory agencies, we noted there are a number of opportunities for bank involvement in community development activities and creation of affordable housing.

**State of Idaho**

**Boise, ID – MSA # 1080**

Demographic Information for Full-Scope Area: Boise, ID – MSA #1080						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	66	4.5	18.2	54.6	19.7	3.0
Population by Geography	295,851	2.2	17.5	53.8	26.4	0.1
Owner-Occupied Housing by Geography	75,031	1.1	15.1	55.5	28.3	0.0
Businesses by Geography	38,435	11.1	13.4	55.7	19.8	0.0
Farms by Geography	1,459	2.5	22.7	62.3	12.5	0.0
Family Distribution by Income Level	78,270	16.8	19.7	24.3	39.2	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	28,623	3.5	25.6	56.4	14.5	0.0
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2002	= \$32,339		Unemployment Rate		= \$64,709	
Households Below the Poverty Level	= \$54,500				= 2.28%	
	= 10.69%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Boise AA consists of Ada and Canyon Counties. The AA does not arbitrarily exclude any LMI geographies. Boise is the state’s capital and its economic hub. The State of Idaho is predominantly rural and has historically been dependent on agriculture, mining and forestry. The larger cities, especially Boise, have had shifts in employment from natural resource based industries to retail trade, services and tourism. This has added more diversity and strength to the overall economy, but has also placed more demands on housing and public infrastructure. The major types of businesses located in the Boise MSA are services (28.39%), retail trade (11.98%), construction (8.94%), finance, insurance & real estate (6.65%) and wholesale trade (3.71%).

Based on community contacts completed by the OCC and other regulatory agencies, we noted a need for the creation of affordable housing, financial education for consumers and small business owners, and start-up loans for small businesses.

State of Indiana

Indianapolis, IN – MSA # 3480

Demographic Information for Full-Scope Area: Indianapolis, IN – MSA #3480						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	310	8.4	24.2	44.8	22.0	0.6
Population by Geography	1,259,247	5.9	22.6	45.0	26.3	0.2
Owner-Occupied Housing by Geography	308,396	3.7	18.8	46.7	30.8	0.0
Businesses by Geography	72,216	7.3	17.1	39.0	36.5	0.1
Farms by Geography	2,630	0.6	5.2	69.3	24.9	0.0
Family Distribution by Income Level	337,446	19.4	18.9	24.0	37.7	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	129,255	10.0	33.7	44.5	11.8	0.0
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$37,198 = \$64,100 = 10.12%	Median Housing Value Unemployment Rate		= \$65,255 = 2.67%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Indianapolis AA consists of Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan and Shelby Counties. The AA does not arbitrarily exclude any LMI geographies. Indianapolis is the capital and largest city in Indiana. The Indianapolis AA has a growing and well-diversified economy. The major types of businesses located in the MSA are services (34.96%), retail trade (14.38%), finance, insurance & real estate (9.79%), construction (7.36%) and wholesale trade (5.14%).

Based on community contacts completed by the OCC and other regulatory agencies, we noted the need for very small business loans, affordable housing, and rehabilitation credit.



State of Maine

Portland, ME – MSA # 6400

Demographic Information for Full-Scope Area: Portland, ME – MSA #6400						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	62	8.1	14.5	61.3	12.9	3.2
Population by Geography	221,295	3.9	9.8	71.7	14.6	0.0
Owner-Occupied Housing by Geography	55,384	0.9	5.8	75.3	18.0	0.0
Businesses by Geography	17,244	5.9	17.6	63.1	13.4	0.0
Farms by Geography	380	2.6	8.2	71.3	17.9	0.0
Family Distribution by Income Level	58,106	17.1	19.7	26.3	36.9	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,386	6.1	12.4	72.2	9.3	0.0
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2002	= \$39,346		Unemployment Rate		= \$118,526	
Households Below the Poverty Level	= \$53,900				= 2.93%	
	= 8.58%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Portland AA consists of portions of Cumberland and York Counties and includes the entire metropolitan area. The AA does not arbitrarily exclude any LMI geographies. Portland is the largest city in Maine. Economic diversification has led to above average job and income growth. Much of the diversification has been fueled by expansion in the wholesale trade sector and a healthy regional economy. The major types of businesses located in the Portland MSA are services (40.60%), retail trade (15.96%), construction (8.57%), finance, insurance & real estate (8.26%) and wholesale trade (4.45%).

Based on community contacts completed by the OCC and other regulatory agencies, we noted affordable housing is the primary credit need.

**State of Michigan**

**Ann Arbor, MI – MSA # 0440**

Demographic Information for Full-Scope Area: Ann Arbor, MI – MSA #0440						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	111	8.1	22.5	43.3	24.3	1.8
Population by Geography	430,421	7.8	22.1	45.5	24.2	0.4
Owner-Occupied Housing by Geography	98,132	0.9	18.9	53.3	26.9	0.0
Businesses by Geography	28,451	7.3	18.0	46.2	28.5	0.0
Farms by Geography	1,474	0.6	20.6	55.3	23.5	0.0
Family Distribution by Income Level	104,158	19.2	18.4	24.8	37.6	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	39,201	6.7	35.4	45.9	12.0	
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$45,123					
Households Below the Poverty Level	= \$76,000					
	= 10.30%					
			Median Housing Value			= \$95,961
			Unemployment Rate			= 2.65%

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Ann Arbor AA consists of all of Lenawee and Washtenaw Counties and a portion of Livingston County. The AA does not arbitrarily exclude any LMI geographies. Ann Arbor is the home of the University of Michigan, which has played a significant role in the growth and economy of the area. The University is a major employer and student activities dominate the city. The major types of businesses located in the MSA are services (40.40%), retail trade (14.36%), construction (9.02%), finance, insurance & real estate (6.96%) and manufacturing (5.30%).

The presence of the University of Michigan has a strong influence on the housing market. Housing costs are high, including land costs and owner- and renter-occupied housing. There are very high percentages of rental properties in the LMI geographies, which is somewhat typical in cities with a large student population.

We used information from Ann Arbor’s Consolidated Plan to identify the credit needs in the AA. Those needs are creation of more affordable housing, rehabilitation of existing affordable housing, and social services.

State of New York

Buffalo/Niagara Falls, NY – MSA # 1280

Demographic Information for Full-Scope Area: Buffalo/Niagara Falls, NY – MSA #1280						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	290	9.0	19.3	49.7	20.3	1.7
Population by Geography	1,189,288	6.9	16.4	50.4	25.7	0.6
Owner-Occupied Housing by Geography	297,969	3.2	12.7	54.5	29.6	0.0
Businesses by Geography	60,981	5.5	14.8	47.2	32.0	0.5
Farms by Geography	1,503	.5	4.5	64.3	30.7	0.0
Family Distribution by Income Level	315,700	19.5	18.2	24.0	38.3	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	119,121	13.1	25.0	47.9	14.0	0.0
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2002	= \$34,831					= \$69,022
Households Below the Poverty Level	= \$50,800					= 3.43%
	= 12.89%					

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Buffalo/Niagara Falls AA consists of Erie and Niagara Counties. The AA does not arbitrarily exclude any LMI geographies. The upstate New York economy has been in decline as a result of lost manufacturing jobs. The Buffalo area has been hit the hardest as the shrinking automobile and steel industries caused significant economic decline in the city and surrounding areas. Between 1950 and 2000, the Buffalo population declined 50 percent and, as other cities continued to grow, Buffalo fell from the 15<sup>th</sup> largest city to the 59<sup>th</sup>. The major types of businesses located in the MSA are services (36.95%), retail trade (17.60%), construction (7.28%), finance, insurance & real estate (5.95%) and wholesale trade (4.72%).

Housing in Buffalo is affordable. However, existing housing generally pre-dates 1940 and in many neighborhoods shows signs of disinvestment. The lead in many of the older buildings makes it difficult to get financing for rehabilitation loans from prime lenders. Based on community contacts completed by the OCC and other regulatory agencies, we noted affordable, new housing and projects that stimulate economic development and revitalization are needed.

State of Ohio

Cleveland/Lorain/Elyria, OH – MSA # 1680

Demographic Information for Full-Scope Area: Cleveland/Lorain/Elyria, OH – MSA #1680						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	653	17.1	16.4	39.5	23.9	3.1
Population by Geography	1,953,346	10.7	14.9	45.6	28.7	0.1
Owner-Occupied Housing by Geography	499,193	5.3	11.3	50.0	33.4	0.0
Businesses by Geography	99,849	7.6	10.5	41.9	36.6	3.4
Farms by Geography	2,605	1.7	8.0	51.7	38.5	0.1
Family Distribution by Income Level	523,222	20.0	17.1	23.8	39.1	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	194,347	19.9	22.6	43.2	14.3	0.0
Median Family Income		Median Housing Value				= \$73,499
HUD Adjusted Median Family Income for 2002	= \$36,500	Unemployment Rate				= 3.36%
Income for 2002	= \$60,000					
Households Below the Poverty Level	= 12.01%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Cleveland/Lorain/Elyria AA consists of Ashtabula, Cuyahoga, Geauga, Lake, and Medina Counties and a portion of Lorain County. The AA does not arbitrarily exclude any LMI geographies. The local economy is diverse. The major types of businesses located in the MSA are services (36.68%), retail trade (16.98%), construction (8.27%), finance, insurance & real estate (8.27%) and manufacturing (6.79%). Economic conditions weakened during the evaluation period due to the impact of the national recession on manufacturing and retail trade.

Based on community contacts completed by the OCC and other regulatory agencies, we noted the creation and rehabilitation of affordable housing, financial education for consumers and small business owners, home improvement and small business loans are needed. There are a large number of community-based organizations in the AA with ample community development and investment opportunities for banks.

State of Oregon

Eugene/Springfield, OR – MSA # 2400

Demographic Information for Full-Scope Area: Eugene/Springfield, OR – MSA # 2400						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	82	2.44	14.63	52.44	14.64	15.85
Population by Geography	282,912	3.34	17.44	62.34	16.88	0.00
Owner-Occupied Housing by Geography	67,387	0.61	13.67	66.21	19.51	0.00
Businesses by Geography						0.00
Farms by Geography						0.00
Family Distribution by Income Level	74,065	19.15	18.55	24.03	38.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,921	2.27	23.89	64.08	9.76	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$30,763					
Households Below the Poverty Level	= \$4,800					
	= 14.69%					
			Median Housing Value			= \$66,271
			Unemployment Rate			= 3.52%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Eugene/Springfield AA consists of Lane County. The AA does not arbitrarily exclude any LMI geographies. Eugene/Springfield is the second largest urban area in Oregon. However, the county is 90 percent forestland. The US Forest Service is landlord for 48 percent of the land in the county. The major types of businesses located in the MSA are services (30.51%), retail trade (14.30%), construction (8.21%), finance, insurance & real estate (6.29%) and manufacturing (5.07%). The AA has experienced growth in its labor market with the addition of employees at the University of Oregon and in the manufacturing trades.

Based on community contacts completed by the OCC and other regulatory agencies, we noted the primary credit needs are financing for small business start-ups and loans for business expansion.

State of Utah

Salt Lake/Ogden, UT – MSA # 7160

Demographic Information for Full-Scope Area: Salt Lake/Ogden, UT – MSA #7160						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	230	4.78	21.30	52.17	21.74	0.00
Population by Geography	1,072,227	1.80	18.21	57.37	22.62	0.00
Owner-Occupied Housing by Geography	234,111	0.82	14.89	59.15	25.14	0.00
Businesses by Geography	127,010	4.80	21.05	48.42	25.73	0.00
Farms by Geography	1,730	2.43	14.16	60.69	22.72	0.00
Family Distribution by Income Level	262,143	16.64	19.61	26.59	37.16	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	95,018	3.50	30.63	55.34	10.53	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$35,240					
Households Below the Poverty Level	= \$57,200					
	= 9.58%					
			Median Housing Value			= \$72,830
			Unemployment Rate			= 2.31%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Salt Lake/Ogden AA consists of Davis, Salt Lake and Weber Counties. The AA does not arbitrarily exclude any LMI geographies. Salt Lake City is the state’s capital and largest city. The AA has a highly diversified economy, but has shown some recent volatility. The high-tech firms, medical, biotech, and computer software companies have been impacted by the national recession and a number of jobs were lost. The major types of businesses located in the MSA are services (26.90%), retail trade (10.79%), finance, insurance & real estate (6.70%), construction (6.41%) and manufacturing (3.26%).

Based on community contacts completed by the OCC and other regulatory agencies, we noted a need for affordable housing, particularly programs with down payment assistance for first-time LMI buyers.

State of Vermont

Burlington, VT – MSA # 1305

Demographic Information for Full-Scope Area: Burlington, VT – MSA #1305						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	9.38	15.62	59.38	15.62	0.00
Population by Geography	154,058	4.72	12.96	65.08	17.24	0.00
Owner-Occupied Housing by Geography	36,716	1.85	9.99	67.29	20.87	0.00
Businesses by Geography	13,412	11.92	11.49	58.11	18.48	0.00
Farms by Geography	364	2.20	12.91	68.41	16.48	0.00
Family Distribution by Income Level	37,641	16.86	18.92	26.98	37.24	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	13,467	8.54	20.04	61.57	9.85	0.00
Median Family Income		Median Housing Value				
HUD Adjusted Median Family Income for 2002	= \$41,968	Unemployment Rate				= \$116,829
Households Below the Poverty Level	= \$57,400					= 2.60%
	= 9.24%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Burlington AA consists of portions of Chittendon, Franklin, and Grand Isle Counties and includes the entire metropolitan area. The AA does not arbitrarily exclude any LMI geographies. The Burlington AA contains the largest concentration of Vermont’s population and provides almost one-third of the state’s jobs. The major types of businesses located in the MSA are services (36.93%), retail trade (16.41%), construction (7.27%), finance, insurance & real estate (6.48%) and manufacturing (4.22%). The Burlington economy was very strong in the 1990’s, but has begun to weaken with slow business growth and the effects of the national recession.

Based on community contacts completed by the OCC and other regulatory agencies, we noted the most pressing credit need is financing for the construction and rehabilitation of affordable housing.

State of Washington

Seattle/Bellevue/Everett, WA – MSA # 7600

Demographic Information for Full-Scope Area: Seattle/Bellevue/Everett, WA MSA #7600						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	439	2.96	17.08	58.77	18.45	2.73
Population by Geography	2,033,156	2.19	16.18	62.80	18.75	0.08
Owner-Occupied Housing by Geography	490,086	0.58	11.79	65.01	22.62	0.00
Businesses by Geography	186,676	2.31	19.81	56.62	21.25	0.01
Farms by Geography	4,295	1.02	13.97	66.17	18.84	0.00
Family Distribution by Income Level	523,808	16.70	18.94	26.92	37.44	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	186,691	2.93	23.47	63.59	10.01	0.00
Median Family Income						
HUD Adjusted Median Family Income for 2002	= \$43,103					
Households Below the Poverty Level	= \$77,900					
	= 7.54%					
			Median Housing Value			= \$141,463
			Unemployment Rate			= 2.31%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Seattle/Bellevue/Everett AA consists of Island, King and Snohomish Counties. The AA does not arbitrarily exclude any LMI geographies. The economy of the AA has long been anchored by lumbering, shipping and aerospace, but is now dominated by high-tech companies, most notably Microsoft. The major types of businesses located in the MSA are services (38.14%), retail trade (14.51%), construction (8.08%), finance, insurance & real estate (7.02%) and manufacturing (4.85%). The growth and dominance of the high-tech sector resulted in significant growth in personal income and wealth. This caused an increase in the cost of housing in the area and created shortages for LMI persons. As of January 2001, the estimated cost of living in Seattle was 35 percent higher than the U. S. average.

Based community contacts completed by the OCC and other regulatory agencies, we noted financing for the construction and rehabilitation of affordable housing, financial education for consumers and small business owners, and providing small businesses with lines of credit, credit cards and small, unsecured loans are among the more pressing credit needs.



## Appendix D: Tables of Performance Data

---

### 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 MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6.** Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
  
- Table 7.** **Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
  
- Table 8.** **Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
  
- Table 9.** **Borrower Distribution of Home Improvement Loans** - See Table 8.
  
- Table 10.** **Borrower Distribution of Refinance Loans** - See Table 8.
  
- Table 11.** **Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
  
- Table 12.** **Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

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

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

## Tables of Performance Data

---

**Multistate Metropolitan Area Portland/Vancouver, OR-WA**  
**State of Portland/Vancouver, OR-WA**  
**State of Alaska**  
**State of Colorado**  
**State of Idaho**  
**State of Indiana**  
**State of Maine**  
**State of Michigan**  
**State of New York**  
**State of Ohio**  
**State of Oregon**  
**State of Utah**  
**State of Vermont**  
**State of Washington**

Institution ID: KeyBank NA

**Table 1. Lending Volume**

LENDING VOLUME												
Geography : PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 6440 Portland/Vancouver	100.00	1,836	141,312	5,847	695,397	206	31,910	17	50,925	7,906	919,544	100.00

\* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
 \*\*\* Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE		Geography : PORTLAND/VANCOUVER, OR-WA MMA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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 ***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	495	100.00	0.67	2.22	13.74	16.36	63.48	48.48	22.11	32.93	0.23	0.23	0.18	0.17	0.39

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT		Geography: PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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 ***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 6440 Portland/Vancouver	987	100.00	0.67	1.11	13.74	16.41	63.48	64.84	22.11	17.63	1.53	0.00	1.72	1.46	1.69

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: PORTLAND/VANCOUVER, OR-WA MMA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	348	100.00	0.67	1.15	13.74	12.07	63.48	56.61	22.11	30.17	0.11	0.28	0.08	0.11	0.12

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography : PORTLAND/VANCOUVER, OR-WA MMA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Multifamily Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review :</b>															
MSA 6440 Portland/Vancouver	6	100.00	1.44	16.67	25.84	66.67	55.04	0.00	17.67	16.67	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	5,847	100.00	1.38	1.23	18.55	18.01	61.14	57.47	18.93	23.29	2.33	2.03	2.36	2.29	3.19

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	206	100.00	0.12	0.49	11.76	8.74	71.35	75.24	16.78	15.53	8.82	0.00	2.94	8.27	25.81

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : PORTLAND/VANCOUVER, OR-WA MMA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Home Purchase 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
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	495	100.00	17.63	8.10	18.71	35.22	25.61	26.92	38.05	29.76	0.26	0.55	0.54	0.32	0.08

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT		Geography: PORTLAND/VANCOUVER, OR-WA MMA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	987	100.00	17.63	7.40	18.71	18.03	25.61	31.31	38.05	43.26	1.59	1.01	2.14	1.17	1.71

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low -Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 6440 Portland/Vancouver	348	100.00	17.63	8.65	18.71	15.56	25.61	23.92	38.05	51.87	0.14	0.20	0.09	0.13	0.15

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PORTLAND/VANCOUVER, OR-WA MMA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 6440 Portland/Vancouver	5,847	100.00	67.62	67.49	72.29	14.69	13.02	2.33	4.28

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.22% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PORTLAND/VANCOUVER, OR-WA MMA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 6440 Portland/Vancouver	206	100.00	89.77	79.61	53.40	23.30	23.30	8.82	9.56

\* Based on 2001 Peer Small Business Data -- US

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

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

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



Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography : PORTLAND/VANCOUVER, OR-WA MMA				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 6440 Portland/Vancouver	29	19,456	100	31,585	129	51,041	100.00	0	0

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS		Geography: PORTLAND/VANCOUVER, OR-WA MMA						Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003									
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
<b>Full Review:</b>																	
MSA 6440 Portland/Vancouver	100.00	37	100.00	2.70	16.22	54.05	27.03	3	2	0	0	2	- 1	1.15	17.63	62.31	18.90

**Institution ID: KeyBank NA**  
**Table 1. Lending Volume**

LENDING VOLUME												
Geography: ALASKA												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 0380 Anchorage	57.89	276	25,872	1,102	213,557	0	0	2	20,237	1,380	259,666	57.89
<b>Limited Review :</b>												
AK Non-MSA AAs	42.11	252	10,611	902	148,720	1	10	5	29,580	1,160	188,921	42.11
Statewide/Regional								3	3,800	3	3,800	

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: ALASKA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 0380 Anchorage	172	90.05	2.04	0.00	11.22	31.98	45.83	52.91	40.91	15.12	0.32	0.00	0.91	0.36	0.14
<b>Limited Review:</b>															
AK Non-MSA AAs	19	9.95	1.25	0.00	5.86	10.53	60.14	47.37	32.75	42.11	0.15	0.00	0.00	0.12	0.24

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography : ALASKA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 0380 Anchorage	48	23.41	2.04	2.08	11.22	18.75	45.83	41.67	40.91	37.50	1.18	0.00	1.82	0.89	1.38	
<b>Limited Review:</b>																
AK Non-MSA AAs	157	76.59	1.25	0.64	5.86	8.28	60.14	58.60	32.75	32.48	6.78	0.00	15.15	7.14	4.20	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ALA SKA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 0380 Anchorage	56	42.42	2.04	1.79	11.22	16.07	45.83	44.64	40.91	37.50	0.28	0.00	0.51	0.40	0.14
<b>Limited Review:</b>															
AK Non-MSA AAs	76	57.58	1.25	1.32	5.86	13.16	60.14	51.32	32.75	34.21	0.50	0.00	1.09	0.26	0.91

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography : ALASKA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 0380 Anchorage	0	0.00	12.71	0.00	44.62	0.00	35.17	0.00	7.49	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
AK Non-MSA AAs	0	0.00	0.00	0.00	28.74	0.00	50.52	0.00	20.74	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography : ALASKA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA 0380 Anchorage	1,102	54.99	5.64	8.17	25.97	22.23	41.00	41.65	27.39	27.95	2.85	3.15	2.60	3.04	3.02
<b>Limited Review:</b>															
AK Non-MSA AAs	902	45.01	2.58	0.55	9.67	13.41	65.79	63.64	21.95	22.39	1.87	0.71	2.96	1.81	2.18

\* Based on 2001 Peer Small Business Data - US

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

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



**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS															
Geography : ALASKA															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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
<b>Full Review:</b>															
MSA 0380 Anchorage	0	0.00	3.37	0.00	16.10	0.00	45.32	0.00	35.21	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
AK Non-MSA AAs	1	100.00	4.04	0.00	5.32	0.00	65.74	100.00	24.89	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : ALASKA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low -Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA 0380 Anchorage	172	90.05	20.01	23.26	17.99	47.09	22.35	18.60	39.65	11.05	0.36	1.54	0.66	0.34	0.09	
<b>Limited Review:</b>																
AK Non-MSA AAs	19	9.95	18.94	5.26	16.83	31.58	22.58	26.32	41.65	36.84	0.17	0.00	0.31	0.00	0.23	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT		Geography : ALASKA									Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 0380 Anchorage	48	23.41	20.01	4.17	17.99	12.50	22.35	37.50	39.65	45.83	1.20	0.00	1.22	3.20	0.36
<b>Limited Review:</b>															
AK Non-MSA AAs	157	76.59	18.94	5.10	16.83	11.46	22.58	28.03	41.65	55.41	6.88	0.00	9.86	4.35	8.20

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ALASKA										Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 0380 Anchorage	56	42.42	20.01	7.14	17.99	14.29	22.35	21.43	39.65	57.14	0.40	0.40	0.31	0.52	0.36	
<b>Limited Review:</b>																
AK Non-MSA AAs	76	57.58	18.94	5.26	16.83	19.74	22.58	22.37	41.65	52.63	0.66	1.08	0.93	0.74	0.56	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography : ALASKA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 0380 Anchorage	1,102	54.99	58.87	61.80	54.90	19.15	25.95	2.85	4.55
<b>Limited Review:</b>									
AK Non-MSA AAs	902	45.01	59.75	64.75	62.75	15.19	22.06	1.87	2.22

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.10% 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 : ALASKA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 0380 Anchorage	0	0.00	88.39	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
AK Non-MSA AAs	1	100.00	90.85	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data -- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ALASKA				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 0380 Anchorage	1	1,691	47	181	48	1,872	39.56	0	0
<b>Limited Review:</b>									
AK Non-MSA AAs	1	866	13	30	14	896	18.93	0	0
Statewide/Regional	0	0	1	1,964	1	1,964	41.51	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: ALASKA										Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003								
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	
<b>Full Review:</b>																		
MSA 0380 Anchorage	40.62	4	22.22	0.00	25.00	50.00	25.00	0	0	0	0	0	0	0	7.49	19.51	42.41	30.59
<b>Limited Review:</b>																		
AK Non-MSA AAs	59.38	14	77.78	0.00	21.43	64.29	14.29	0	2	0	0	- 2	0	1.21	13.68	56.29	28.60	



Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: COLORADO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA2080 Denver	69.19	2,237	143,931	4,145	484,309	2	105	14	43,815	6,398	672,160	
<b>Limited Review:</b>												
MSA 1125 Boulder/Longmont	4.34	228	11,914	172	20,224	0	0	1	1,700	401	33,838	1.72
MSA 1720 Colorado Springs	10.29	370	8,569	581	36,550	0	0	1	700	952	45,819	10.26
MSA 2670 Ft.Collins/Loveland	8.90	329	11,806	494	30,644	0	0	0	0	823	42,450	16.93
MSA 3060 Greeley	4.64	272	6,125	146	6,285	11	1,172	0	0	429	13,582	0.97
CO Non-MSA AAs	2.64	67	2,288	92	11,198	85	6,528	0	0	244	20,014	5.97

\* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
 \*\*\* Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: COLORADO								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA2080 Denver	444	67.17	3.67	9.01	19.89	21.85	45.25	37.16	31.19	31.98	0.10	0.23	0.09	0.07	0.13
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	71	10.74	0.02	0.00	15.38	18.31	52.22	63.38	32.38	18.31	0.19	0.00	0.28	0.19	0.13
MSA 1720 Colorado Springs	33	4.99	1.30	0.00	18.80	24.24	45.72	30.30	34.18	45.45	0.03	0.00	0.07	0.03	0.02
MSA 2670 Ft.Collins/Loveland	46	6.96	3.23	4.35	10.86	8.70	64.15	78.26	21.76	8.70	0.20	0.50	0.10	0.24	0.08
MSA 3060 Greeley	52	7.87	1.87	1.92	20.83	26.92	54.17	51.92	23.13	19.23	0.28	0.79	0.44	0.22	0.23
CO Non-MSA AAs	15	2.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.59	0.00	0.00	0.59	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT		Geography : COLORADO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA2080 Denver	1,417	62.37	3.67	4.73	19.89	18.70	45.25	52.01	31.19	24.56	3.71	5.43	4.73	3.97	2.66
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	127	5.59	0.02	0.79	15.38	16.54	52.22	58.27	32.38	24.41	4.17	100.00	7.43	3.90	2.79
MSA 1720 Colorado Springs	292	12.85	1.30	0.34	18.80	22.60	45.72	44.52	34.18	32.53	1.24	0.00	3.38	1.07	0.78
MSA 2670 Ft.Collins/Loveland	208	9.15	3.23	6.25	10.86	14.42	64.15	67.31	21.76	12.02	5.85	7.69	8.89	6.31	2.72
MSA 3060 Greeley	194	8.54	1.87	2.58	20.83	33.51	54.17	39.18	23.13	24.74	7.07	23.08	19.30	3.25	9.41
CO Non-MSA AAs	34	1.50	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	3.38	0.00	0.00	3.38	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: COLORADO								JANUARY 1, 1999 TO DECEMBER 31, 2002					
	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
<b>Full Review:</b>															
MSA2080 Denver	371	65.66	3.67	5.39	19.89	18.06	45.25	37.74	31.19	38.81	0.06	0.12	0.05	0.04	0.07
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	30	5.31	0.02	0.00	15.38	10.00	52.22	53.33	32.38	36.67	0.04	0.00	0.03	0.04	0.04
MSA 1720 Colorado Springs	45	7.96	1.30	0.00	18.80	20.00	45.72	44.44	34.18	35.56	0.02	0.00	0.00	0.01	0.04
MSA 2670 Ft.Collins/Loveland	75	13.27	3.23	4.00	10.86	14.67	64.15	66.67	21.76	14.67	0.08	0.00	0.20	0.08	0.05
MSA 3060 Greeley	26	4.60	1.87	3.85	20.83	11.54	54.17	73.08	23.13	11.54	0.10	0.74	0.12	0.10	0.04
CO Non-MSA AAs	18	3.19	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.27	0.00	0.00	0.27	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: COLORADO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA2080 Denver	1	100.00	12.36	0.00	35.84	100.00	40.34	0.00	11.46	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 1125 Boulder/Longmont	0	0.00	4.21	0.00	33.45	0.00	46.71	0.00	15.63	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 1720 Colorado Springs	0	0.00	3.07	0.00	38.12	0.00	36.85	0.00	21.96	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2670 Ft.Collins/Loveland	0	0.00	8.03	0.00	25.58	0.00	52.41	0.00	13.98	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 3060 Greeley	0	0.00	9.42	0.00	46.63	0.00	22.15	0.00	21.80	0.00	0.00	0.00	0.00	0.00	0.00	
CO Non-MSA AAs	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: COLORADO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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					
<b>Full Review:</b>																				
MSA2080 Denver	4,145	73.75	7.81	12.26	20.72	24.16	37.45	29.41	34.02	34.17	1.38	1.90	1.44	1.09	1.65					
<b>Limited Review:</b>																				
MSA 1125 Boulder/Longmont	172	3.06	1.01	0.58	19.83	22.09	56.84	58.72	22.32	18.60	0.44	1.64	0.45	0.50	0.37					
MSA 1720 Colorado Springs	581	10.34	2.01	1.20	27.87	34.08	36.05	31.67	34.07	33.05	0.83	0.57	0.86	0.70	1.08					
MSA 2670 Ft.Collins/Loveland	494	8.79	8.49	8.50	15.38	17.41	58.26	53.24	17.87	20.85	0.98	0.47	1.58	0.88	1.25					
MSA 3060 Greeley	146	2.60	9.21	8.22	19.08	22.60	52.17	53.42	19.54	15.75	0.46	0.33	1.00	0.40	0.24					
CO Non-MSA AAs	92	1.64	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.82	0.00	0.00	0.88	0.00					

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: COLORADO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA2080 Denver	2	2.04	3.58	50.00	18.48	0.00	44.92	50.00	33.03	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	0	0.00	0.00	0.00	14.06	0.00	56.24	0.00	29.70	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1720 Colorado Springs	0	0.00	1.24	0.00	19.97	0.00	49.31	0.00	29.48	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2670 Ft.Collins/Loveland	0	0.00	5.43	0.00	9.27	0.00	68.87	0.00	16.42	0.00	0.00	0.00	0.00	0.00	0.00
MSA 3060 Greeley	11	11.22	2.34	0.00	8.43	0.00	82.11	100.00	7.11	0.00	0.27	0.00	0.00	0.30	0.00
CO Non-MSA AAs	85	86.73	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.60	0.00	0.00	2.60	0.00

\* Based on 2001 Peer Small Business Data - US

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

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

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

Borrower Distribution: HOME PURCHASE		Geography : COLORADO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low -Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% Families ***	% BANK Loans ****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA2080 Denver	445	67.22	18.79	14.61	18.71	19.55	24.56	18.65	37.94	47.19	0.13	0.09	0.06	0.09	0.20	
<b>Limited Review:</b>																
MSA 1125 Boulder/Longmont	71	10.73	18.09	1.41	18.09	14.08	25.55	28.17	38.28	56.34	0.24	0.00	0.05	0.38	0.31	
MSA 1720 Colorado Springs	33	4.98	18.03	6.06	19.64	12.12	23.31	12.12	39.02	69.70	0.04	0.00	0.00	0.04	0.06	
MSA 2670 Ft.Collins/Loveland	46	6.95	18.55	2.17	19.21	17.39	23.98	34.78	38.27	45.65	0.24	0.00	0.24	0.39	0.18	
MSA 3060 Greeley	52	7.85	20.07	5.77	18.18	3.85	22.96	21.15	38.78	69.23	0.33	0.64	0.00	0.24	0.44	
CO Non-MSA AAs	15	2.27	19.79	26.67	19.60	33.33	25.31	13.33	35.30	26.67	0.68	2.70	0.70	0.48	0.50	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% 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.



Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT		Geography : COLORADO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA2080 Denver	1,420	62.42	18.79	3.80	18.71	17.82	24.56	39.72	37.94	38.66	3.80	0.79	3.15	5.33	3.53
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	127	5.58	18.09	4.72	18.09	16.54	25.55	29.92	38.28	48.82	4.34	3.10	1.53	4.46	6.76
MSA 1720 Colorado Springs	292	12.84	18.03	3.77	19.64	19.52	23.31	28.08	39.02	48.63	1.27	0.51	1.82	1.25	1.20
MSA 2670 Ft.Collins/Loveland	208	9.14	18.55	6.73	19.21	24.04	23.98	31.25	38.27	37.98	6.14	4.55	9.72	3.95	6.36
MSA 3060 Greeley	194	8.53	20.07	3.09	18.18	14.43	22.96	24.74	38.78	57.73	7.32	0.00	6.52	5.97	8.44
CO Non-MSA AAs	34	1.49	19.79	23.53	19.60	14.71	25.31	32.35	35.30	29.41	3.45	15.38	3.33	2.63	1.56

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: COLORADO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA2080 Denver	371	65.66	18.79	6.20	18.71	16.44	24.56	23.45	37.94	53.91	0.08	0.04	0.04	0.06	0.11
<b>Limited Review:</b>															
MSA 1125 Boulder/Longmont	30	5.31	18.09	6.67	18.09	23.33	25.55	26.67	38.28	43.33	0.05	0.05	0.06	0.05	0.04
MSA 1720 Colorado Springs	45	7.96	18.03	6.67	19.64	17.78	23.31	28.89	39.02	46.67	0.03	0.00	0.00	0.03	0.05
MSA 2670 Ft.Collins/Loveland	75	13.27	18.55	9.33	19.21	12.00	23.98	25.33	38.27	53.33	0.11	0.12	0.00	0.09	0.16
MSA 3060 Greeley	26	4.60	20.07	3.85	18.18	3.85	22.96	19.23	38.78	73.08	0.13	0.41	0.09	0.04	0.16
CO Non-MSA AAs	18	3.19	19.79	5.56	19.60	5.56	25.31	22.22	35.30	66.67	0.35	0.00	0.00	0.35	0.53

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography : COLORADO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA2080 Denver	4,145	73.62	63.51	70.90	74.89	11.41	13.70	1.38	2.52
<b>Limited Review:</b>									
MSA 1125 Boulder/Longmont	172	3.06	63.51	72.67	79.07	5.23	15.70	0.44	0.81
MSA 1720 Colorado Springs	581	10.32	67.87	78.14	89.50	5.16	5.34	0.83	1.83
MSA 2670 Ft.Collins/Loveland	494	8.77	69.70	84.82	89.27	4.66	6.07	0.98	1.96
MSA 3060 Greeley	146	2.59	68.34	86.30	93.84	2.74	3.42	0.46	0.81
CO Non-MSA AAs	92	1.63	72.10	73.91	75.00	10.87	14.13	0.82	0.81

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.23% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography : COLORADO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA2080 Denver	2	2.04	89.98	50.00	100.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
MSA 1125 Boulder/Longmont	0	0.00	92.09	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1720 Colorado Springs	0	0.00	91.87	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2670 Ft.Collins/Loveland	0	0.00	90.60	0.00	0.00	0.00	0.00	0.00	0.00
MSA 3060 Greeley	11	11.22	89.33	100.00	81.82	0.00	18.18	0.27	0.31
CO Non-MSA AAs	85	86.73	92.49	100.00	81.18	11.76	7.06	2.60	2.66

\* Based on 2001 Peer Small Business Data -- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA2080 Denver	8	3,507	106	16,492	114	19,999	64.01	0	0
<b>Limited Review:</b>									
MSA 1125 Boulder/Longmont	2	189	6	1,782	8	1,971	6.31	0	0
MSA 1720 Colorado Springs	0	0	9	4,802	9	4,802	15.37	0	0
MSA 2670 Ft.Collins/Loveland	1	142	7	2,838	8	2,980	9.54	0	0
MSA 3060 Greeley	1	73	1	191	2	264	0.85	0	0
CO Non-MSA AAs	1	378	2	847	3	1,225	3.92	0	0

---

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: COLORADO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA2080 Denver	64.15	26	60.47	7.69	11.54	50.00	30.77	6	1	0	- 1	5	1	6.86	23.97	43.35	25.82
<b>Limited Review:</b>																	
MSA 1125 Boulder/Longmont	1.72	3	6.98	0.00	0.00	100.00	0.00	2	0	0	0	2	0	3.03	17.92	51.96	26.62
MSA 1720 Colorado Springs	10.26	6	13.95	0.00	33.33	16.67	50.00	3	0	0	0	0	3	1.81	25.89	44.03	28.27
MSA 2670 Ft.Collins/Loveland	16.93	5	11.63	20.00	20.00	40.00	20.00	0	0	0	0	0	0	5.68	14.04	61.44	18.84
MSA 3060 Greeley	0.97	1	2.33	100.00	0.00	0.00	0.00	0	0	0	0	0	0	3.47	27.07	50.19	19.27
CO Non-MSA AAs	5.97	2	4.65	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: IDAHO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 1080 Boise	52.03	908	114,954	2,311	278,778	95	12,224	11	15,301	3,325	421,257	37.12
<b>Limited Review:</b>												
MSA 6340 Pocatello	4.76	99	2,050	175	18,454	30	3,470	0	0	304	23,974	15.33
ID Non- MSA AAs	43.21	686	16,800	1,145	106,283	925	123,759	5	5,033	2,761	251,875	47.55

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE		Geography: IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
MSA 1080 Boise	441	84.00	1.07	0.91	15.08	8.84	55.50	62.13	28.36	28.12	0.55	0.00	0.37	0.60	0.51
<b>Limited Review:</b>															
MSA 6340 Pocatello	11	2.10	0.00	0.00	14.72	0.00	64.76	81.82	20.51	18.18	0.06	0.00	0.00	0.09	0.00
ID Non-MSA AAs	73	13.90	0.00	0.00	9.53	2.74	71.43	83.56	19.04	13.70	0.30	0.00	0.00	0.34	0.30

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography: IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 1080 Boise	244	31.12	1.07	0.82	15.08	14.75	55.50	57.79	28.36	26.64	5.91	16.67	5.71	5.41	6.63	
<b>Limited Review:</b>																
MSA 6340 Pocatello	63	8.04	0.00	0.00	14.72	15.87	64.76	55.56	20.51	28.57	13.26	0.00	22.73	11.01	14.00	
ID Non-MSA AAs	477	60.84	0.00	0.00	9.53	4.40	71.43	81.55	19.04	14.05	24.01	0.00	8.70	26.26	21.21	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: IDAHO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 1080 Boise	222	57.96	1.07	0.45	15.08	8.11	55.50	51.35	28.36	40.09	0.30	0.81	0.26	0.30	0.31
<b>Limited Review:</b>															
MSA 6340 Pocatello	25	6.53	0.00	0.00	14.72	20.00	64.76	56.00	20.51	24.00	0.49	0.00	0.83	0.46	0.43
ID Non-MSA AAs	136	35.51	0.00	0.00	9.53	6.62	71.43	78.68	19.04	14.71	0.44	0.00	0.00	0.53	0.24

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 1080 Boise	1	100.00	10.75	0.00	15.61	100.00	46.23	0.00	27.41	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 6340 Pocatello	0	0.00	0.00	0.00	39.43	0.00	53.29	0.00	7.28	0.00	0.00	0.00	0.00	0.00	0.00	
ID Non-MSA AAs	0	0.00	0.00	0.00	23.17	0.00	59.89	0.00	16.94	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography : IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ...	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
MSA 1080 Boise	2,311	63.65	11.07	14.32	13.42	11.81	55.74	54.48	19.77	19.39	5.28	7.56	3.56	5.38	6.45	
<b>Limited Review:</b>																
MSA 6340 Pocatello	175	4.82	0.00	0.00	31.51	33.14	55.17	49.71	13.32	17.14	2.61	0.00	2.52	3.11	2.56	
ID Non-MSA AAs	1,145	31.53	0.00	0.00	15.41	12.49	65.23	69.96	19.35	17.55	3.19	0.00	3.48	3.35	3.22	

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
MSA 1080 Boise	95	9.05	2.54	0.00	22.69	37.89	62.30	49.47	12.47	12.63	2.96	0.00	4.07	2.10	6.67	
<b>Limited Review:</b>																
MSA 6340 Pocatello	30	2.86	0.00	0.00	11.31	13.33	72.62	60.00	16.07	26.67	15.38	0.00	75.00	5.00	13.33	
ID Non-MSA AAs	925	88.10	0.00	0.00	4.69	2.27	87.39	93.08	7.92	4.65	7.73	0.00	5.00	7.87	7.81	

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : IDAHO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase 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
<b>Full Review:</b>															
MSA 1080 Boise	441	84.00	16.83	19.09	19.74	40.91	24.27	13.86	39.16	26.14	0.66	1.24	1.02	0.40	0.48
<b>Limited Review:</b>															
MSA 6340 Pocatello	11	2.10	19.88	27.27	17.47	18.18	25.38	9.09	37.28	45.45	0.07	0.00	0.27	0.00	0.00
ID Non-MSA AAs	73	13.90	17.55	17.81	19.31	20.55	24.00	30.14	39.13	31.51	0.37	1.15	0.24	0.42	0.29

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT		Geography: IDAHO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA 1080 Boise	244	31.12	16.83	8.68	19.74	18.18	24.27	28.51	39.16	44.63	6.11	8.47	4.62	5.78	6.51	
<b>Limited Review:</b>																
MSA 6340 Pocatello	63	8.04	19.88	11.11	17.47	34.92	25.38	20.63	37.28	33.33	13.56	25.00	20.00	7.84	12.50	
ID Non-MSA AAs	477	60.84	17.55	5.88	19.31	20.38	24.00	24.16	39.13	49.58	24.56	14.81	25.77	24.43	25.19	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IDAHO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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****						
<b>Full Review:</b>																
MSA 1080 Boise	222	57.96	16.83	3.21	19.74	9.63	24.27	16.06	39.16	71.10	0.39	0.12	0.23	0.28	0.53	
<b>Limited Review:</b>																
MSA 6340 Pocatello	25	6.53	19.88	16.00	17.47	20.00	25.38	32.00	37.28	32.00	0.62	0.00	0.81	0.59	0.67	
ID Non-MSA AAs	136	35.51	17.55	5.19	19.31	10.37	24.00	30.37	39.13	54.07	0.54	0.00	0.39	0.78	0.51	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by BANK.

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

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



Institution ID: KeyBank NA

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: IDAHO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1080 Boise	2,311	63.65	61.53	75.90	70.71	16.83	12.46	5.28	10.34
<b>Limited Review:</b>									
MSA 6340 Pocatello	175	4.82	69.06	70.29	74.29	13.14	12.57	2.61	4.88
ID Non-MSA AAs	1,145	31.53	64.23	75.02	77.55	12.58	9.87	3.19	5.00

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.22% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: IDAHO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 1080 Boise	95	9.05	90.68	85.26	58.95	25.26	15.79	2.96	3.34
<b>Limited Review:</b>									
MSA 6340 Pocatello	30	2.86	93.45	80.00	63.33	16.67	20.00	15.38	19.35
ID Non-MSA AAs	925	88.10	87.31	85.51	56.43	26.16	17.41	7.73	7.45

\* Based on 2001 Peer Small Business Data - US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: IDAHO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 1080 Boise	3	1,852	50	206	53	2,058	47.10	0	0
<b>Limited Review:</b>									
MSA 6340 Pocatello	0	0	8	18	8	18	0.40	0	0
ID Non-MSA AAs	0	0	11	2,294	11	2,294	52.50	0	0

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: IDAHO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003									
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
<b>Full Review:</b>																	
MSA 1080 Boise	37.12	12	40.00	8.33	16.67	50.00	25.00	1	0	0	0	0	1	2.23	17.49	53.76	26.43
<b>Limited Review:</b>																	
MSA 6340 Pocatello	15.33	3	10.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	16.42	64.33	19.25
ID Non-MSA AAs	47.55	15	50.00	0.00	26.67	66.67	6.67	0	0	0	0	0	0	0.00	10.23	71.57	18.21

Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: INDIANA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 3480 Indianapolis	55.82	2,360	102,369	2,639	182,321	66	8,085	12	18,321	5,077	311,096	39.00
<b>Limited Review:</b>												
MSA 1020 Bloomington	1.10	39	2,313	61	2,384	0	0	0	0	100	4,697	0.35
MSA 2330 Elkhart	15.32	703	33,578	678	74,537	8	612	4	687	1,393	109,414	21.32
MSA 3850 Kokomo	5.01	290	15,651	160	10,256	6	1,166	0	0	456	27,073	11.22
MSA 7800 South Bend	13.15	704	34,707	485	54,023	1	98	6	4,155	1,196	92,983	14.88
IN Non-MSA AAs	9.60	465	16,909	366	28,724	42	2,013	0	0	873	47,646	13.23
Statewide/Regional								1	5,462	1	5,462	

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE		Geography: INDIANA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 3480 Indianapolis	358	39.87	3.69	12.85	18.84	16.76	46.66	38.83	30.81	31.56	0.19	0.56	0.25	0.22	0.13
<b>Limited Review:</b>															
MSA 1020 Bloomington	7	0.78	0.03	0.00	20.41	0.00	50.84	14.29	28.72	85.71	0.05	0.00	0.00	0.00	0.15
MSA 2330 Elkhart	181	20.16	0.03	0.00	4.01	7.73	86.30	81.22	9.66	11.05	0.88	0.00	0.98	0.90	0.76
MSA 3850 Kokomo	53	5.90	0.12	0.00	22.57	9.43	50.13	71.70	27.17	18.87	0.45	0.00	0.32	0.61	0.21
MSA 7800 South Bend	232	25.84	2.02	4.31	18.67	30.60	59.38	51.72	19.93	13.36	1.02	3.85	1.64	1.00	0.47
IN Non-MSA AAs	67	7.46	0.00	0.00	1.71	1.49	85.05	82.09	13.24	16.42	0.52	0.00	0.00	0.56	0.36

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography : INDIANA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 3480 Indianapolis	1,572	58.79	3.69	3.18	18.84	15.01	46.66	54.01	30.81	27.80	7.08	7.19	7.12	7.42	6.55
<b>Limited Review:</b>															
MSA 1020 Bloomington	27	1.01	0.03	0.00	20.41	22.22	50.84	74.07	28.72	3.70	1.63	0.00	0.00	2.27	0.98
MSA 2330 Elkhart	344	12.86	0.03	0.29	4.01	3.20	86.30	84.88	9.66	11.63	9.62	0.00	15.00	8.98	12.99
MSA 3850 Kokomo	139	5.20	0.12	0.72	22.57	23.74	50.13	56.83	27.17	18.71	5.23	0.00	6.59	6.15	2.86
MSA 7800 South Bend	308	11.52	2.02	3.25	18.67	22.73	59.38	55.84	19.93	18.18	6.97	15.00	14.48	5.44	6.22
IN Non-MSA AAs	284	10.62	0.00	0.00	1.71	2.82	85.05	83.10	13.24	14.08	7.86	0.00	21.05	7.54	7.29

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: INDIANA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 3480 Indianapolis	429	43.47	3.69	3.26	18.84	9.09	46.66	51.75	30.81	35.90	0.22	0.31	0.16	0.28	0.17
<b>Limited Review:</b>															
MSA 1020 Bloomington	5	0.51	0.03	0.00	20.41	0.00	50.84	80.00	28.72	20.00	0.03	0.00	0.00	0.05	0.00
MSA 2330 Elkhart	178	18.03	0.03	0.00	4.01	3.93	86.30	85.39	9.66	10.67	0.93	0.00	0.00	0.99	0.82
MSA 3850 Kokomo	98	9.93	0.12	0.00	22.57	10.20	50.13	50.00	27.17	39.80	1.35	0.00	0.60	1.39	1.69
MSA 7800 South Bend	163	16.51	2.02	1.84	18.67	22.70	59.38	55.83	19.93	19.63	0.72	0.00	2.13	0.55	0.49
IN Non-MSA AAs	114	11.55	0.00	0.00	1.71	4.39	85.05	80.70	13.24	14.91	0.60	0.00	0.64	0.63	0.50

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: INDIANA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 3480 Indianapolis	0	0.00	7.85	0.00	23.66	0.00	47.50	0.00	20.99	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 1020 Bloomington	0	0.00	10.80	0.00	48.07	0.00	11.70	0.00	29.44	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2330 Elkhart	0	0.00	3.74	0.00	10.01	0.00	82.99	0.00	3.26	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 3850 Kokomo	0	0.00	4.12	0.00	20.89	0.00	57.60	0.00	17.39	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 7800 South Bend	1	100.00	6.62	0.00	22.49	0.00	49.18	100.00	21.72	0.00	0.00	0.00	0.00	0.00	0.00	
IN Non-MSA AAs	0	0.00	0.00	0.00	0.00	0.00	93.28	0.00	6.72	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: INDIANA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						
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
<b>Full Review:</b>															
MSA 3480 Indianapolis	2,639	60.14	7.34	3.75	17.09	11.41	39.06	38.25	36.51	46.59	1.43	1.28	1.20	1.31	1.81
<b>Limited Review:</b>															
MSA 1020 Bloomington	61	1.39	2.92	1.64	42.63	42.62	29.78	31.15	24.66	24.59	0.14	0.00	0.08	0.37	0.00
MSA 2330 Elkhart	678	15.45	4.98	1.77	5.48	6.34	83.29	84.22	6.25	7.67	2.88	0.58	5.62	3.09	1.82
MSA 3850 Kokomo	160	3.65	6.22	5.63	27.39	23.13	45.02	40.00	21.37	31.25	1.20	1.35	1.77	1.04	1.19
MSA 7800 South Bend	485	11.05	9.28	6.39	19.58	21.86	54.85	54.85	16.30	16.91	1.74	2.08	2.78	1.63	1.32
IN Non-MSA AAs	366	8.34	0.00	0.00	1.55	0.00	84.42	81.97	14.04	18.03	1.84	0.00	0.00	2.01	1.71

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: INDIANA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
MSA 3480 Indianapolis	66	53.66	0.57	4.55	5.17	0.00	69.34	69.70	24.91	25.76	1.95	0.00	0.00	1.44	6.52	
<b>Limited Review:</b>																
MSA 1020 Bloomington	0	0.00	1.08	0.00	13.98	0.00	68.28	0.00	16.67	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2330 Elkhart	8	6.50	0.19	0.00	0.37	0.00	89.89	100.00	9.55	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 3850 Kokomo	6	4.88	0.00	0.00	3.47	0.00	55.56	50.00	40.97	50.00	0.00	0.00	0.00	0.00	0.00	
MSA 7800 South Bend	1	0.81	1.11	0.00	3.11	0.00	80.22	100.00	15.56	0.00	0.00	0.00	0.00	0.00	0.00	
IN Non-MSA AAs	42	34.15	0.00	0.00	1.86	0.00	93.59	100.00	4.55	0.00	1.79	0.00	0.00	1.86	0.00	

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography: INDIANA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low -Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA 3480 Indianapolis	358	39.87	19.44	23.46	18.85	29.61	23.95	19.83	37.75	27.09	0.22	0.43	0.21	0.16	0.18	
<b>Limited Review:</b>																
MSA 1020 Bloomington	7	0.78	19.78	14.29	16.85	14.29	24.35	28.57	39.03	42.86	0.06	0.00	0.00	0.19	0.00	
MSA 2330 Elkhart	181	20.16	14.67	29.83	20.66	29.28	28.16	20.44	36.50	20.44	1.01	1.82	1.38	0.66	0.29	
MSA 3850 Kokomo	53	5.90	20.64	18.87	16.31	26.42	24.40	28.30	38.65	26.42	0.49	0.00	0.45	0.75	0.51	
MSA 7800 South Bend	232	25.84	17.81	34.91	19.60	32.33	24.14	16.81	38.44	15.95	1.19	3.05	1.29	0.77	0.67	
IN Non-MSA AAs	67	7.46	13.58	13.43	17.96	38.81	27.45	19.40	41.01	28.36	0.56	0.40	0.90	0.24	0.58	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT			Geography: INDIANA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 3480 Indianapolis	1,573	58.80	19.44	11.46	18.85	20.45	23.95	28.79	37.75	39.30	7.38	3.71	6.15	8.26	9.60
<b>Limited Review:</b>															
MSA 1020 Bloomington	27	1.01	19.78	3.70	16.85	14.81	24.35	14.81	39.03	66.67	1.65	2.13	0.00	1.53	2.90
MSA 2330 Elkhart	344	12.86	14.67	13.82	20.66	29.41	28.16	29.71	36.50	27.06	9.89	10.64	7.82	10.38	11.05
MSA 3850 Kokomo															
MSA 7800 South Bend	139	5.20	20.64	10.79	16.31	29.50	24.40	25.90	38.65	33.81	5.43	2.00	5.00	6.38	6.04
IN Non-MSA AAs	308	11.51	17.81	18.24	19.60	29.97	24.14	27.36	38.44	24.43	7.03	8.33	7.46	7.83	5.18
MSA 3480 Indianapolis	284	10.62	13.58	12.72	17.96	22.26	27.45	33.57	41.01	31.45	8.02	6.17	7.98	7.98	8.71

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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****						
<b>Full Review:</b>																
MSA 3480 Indianapolis	429	43.47	19.44	12.65	18.85	23.42	23.95	26.93	37.75	37.00	0.28	0.25	0.36	0.33	0.21	
<b>Limited Review:</b>																
MSA 1020 Bloomington	5	0.51	19.78	0.00	16.85	20.00	24.35	60.00	39.03	20.00	0.03	0.00	0.16	0.00	0.00	
MSA 2330 Elkhart	178	18.03	14.67	15.25	20.66	23.73	28.16	21.47	36.50	39.55	1.09	1.33	0.69	1.04	1.40	
MSA 3850 Kokomo	98	9.93	20.64	11.34	16.31	12.37	24.40	27.84	38.65	48.45	1.61	1.37	1.13	1.26	2.24	
MSA 7800 South Bend	163	16.51	17.81	15.95	19.60	25.15	24.14	13.50	38.44	45.40	0.85	1.78	0.88	0.36	0.91	
IN Non-MSA AAs	114	11.55	13.58	7.89	17.96	29.82	27.45	28.95	41.01	33.33	0.69	1.05	0.75	0.80	0.54	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography : INDIANA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 3480 Indianapolis	2,639	60.13	71.27	76.09	85.37	8.11	6.52	1.43	2.22
<b>Limited Review:</b>									
MSA 1020 Bloomington	61	1.39	75.95	80.33	91.80	8.20	0.00	0.14	0.20
MSA 2330 Elkhart	678	15.45	71.38	63.86	72.71	13.13	14.16	2.88	3.53
MSA 3850 Kokomo	160	3.65	76.57	80.00	86.88	9.38	3.75	1.20	1.40
MSA 7800 South Bend	485	11.05	74.10	72.16	75.46	12.16	12.37	1.74	2.46
IN Non-MSA AAs	366	8.34	77.53	80.60	83.88	7.10	9.02	1.84	2.33

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.18% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography : INDIANA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 3480 Indianapolis	66	53.66	95.17	87.88	62.12	28.79	9.09	1.95	1.90
<b>Limited Review:</b>									
MSA 1020 Bloomington	0	0.00	95.70	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2330 Elkhart	8	6.50	95.32	62.50	75.00	25.00	0.00	0.00	0.00
MSA 3850 Kokomo	6	4.88	97.92	100.00	33.33	50.00	16.67	0.00	0.00
MSA 7800 South Bend	1	0.81	93.78	100.00	100.00	0.00	0.00	0.00	0.00
IN Non-MSA AAs	42	34.15	97.24	100.00	85.71	14.29	0.00	1.79	1.90

\* Based on 2001 Peer Small Business Data -- US

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

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

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



Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: INDIANA				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 3480 Indianapolis	21	4,596	46	5,454	67	10,050	55.03	0	0
<b>Limited Review:</b>									
MSA 1020 Bloomington	0	0	0	0	0	0	0.00	0	0
MSA 2330 Elkhart	0	0	8	226	8	226	1.24	0	0
MSA 3850 Kokomo	0	0	5	15	5	15	0.08	0	0
MSA 7800 South Bend	1	71	29	244	30	315	1.72	0	0
IN Non-MSA AAs	1	67	4	13	5	80	0.44	0	0
Statewide/Regional	4	2,808	2	4,770	6	7,578	41.49	0	0

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: INDIANA				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 3480 Indianapolis	39.00	25	40.32	4.00	20.00	36.00	40.00	0	4	0	0	0	- 4	5.88	22.62	45.04	26.24
<b>Limited Review:</b>																	
MSA 1020 Bloomington	0.35	1	1.61	0.00	0.00	0.00	100.00	0	0	0	0	0	0	13.89	28.15	34.09	23.88
MSA 2330 Elkhart	21.32	13	20.97	7.69	7.69	84.62	0.00	0	2	- 1	0	- 1	0	0.46	6.47	84.56	8.52
MSA 3850 Kokomo	11.22	5	8.06	20.00	20.00	60.00	0.00	0	0	0	0	0	0	0.38	25.77	48.82	25.03
MSA 7800 South Bend	14.88	9	14.52	11.11	11.11	55.56	22.22	0	3	- 1	0	- 2	0	3.07	23.16	55.63	18.14
IN Non-MSA AAs	13.23	9	14.52	0.00	0.00	66.67	33.33	0	1	0	- 1	0	0	0.00	1.57	86.33	12.10

Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: MAINE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 6400 Portland	28.95	766	87,013	1,950	180,082	3	515	8	17,580	2,727	285,190	34.23
<b>Limited Review:</b>												
MSA 0730 Bangor	6.89	221	7,549	412	48,481	13	849	3	1,600	649	58,479	5.24
MSA 4240 Lewiston/Auburn	3.33	129	7,031	184	21,044	0	0	0	0	313	28,075	4.21
MSA 6450 Portsmouth	0.73	28	3,611	41	2,367	0	0	0	0	69	5,978	1.25
ME Non-MSA AAs	60.10	2,894	112,934	2,530	250,827	231	27,064	6	5,066	5,661	395,891	55.07
Statewide/Regional								3	18,788	3	18,788	

\* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
 \*\*\* Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: MAINE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 6400 Portland	264	29.17	0.86	0.76	5.85	12.12	75.30	69.32	17.99	17.80	0.98	0.00	1.47	1.00	0.76	
<b>Limited Review:</b>																
MSA 0730 Bangor	33	3.65	0.00	0.00	7.18	18.18	86.26	78.79	6.56	3.03	0.63	0.00	1.16	0.55	0.84	
MSA 4240 Lewiston/Auburn	54	5.97	0.20	0.00	4.49	3.70	85.35	88.89	9.96	7.41	0.89	0.00	2.47	0.91	0.00	
MSA 6450 Portsmouth	5	0.55	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.11	0.00	0.00	0.11	0.00	
ME Non-MSA AAs	549	60.66	0.01	0.36	7.82	6.56	76.57	83.42	15.60	9.65	1.47	0.00	1.83	1.76	0.55	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT		Geography : MAINE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 6400 Portland	221	10.40	0.86	0.90	5.85	9.05	75.30	77.83	17.99	12.22	5.38	28.57	6.90	5.26	4.14
<b>Limited Review:</b>															
MSA 0730 Bangor	144	6.78	0.00	0.00	7.18	9.03	86.26	84.72	6.56	6.25	5.60	0.00	11.76	4.89	13.33
MSA 4240 Lewiston/Auburn	43	2.02	0.20	0.00	4.49	2.33	85.35	90.70	9.96	6.98	5.13	0.00	0.00	5.59	0.00
MSA 6450 Portsmouth	12	0.56	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.48	0.00	0.00	1.48	0.00
ME Non-MSA AAs	1,704	80.23	0.01	0.00	7.82	10.86	76.57	82.22	15.60	6.92	16.28	0.00	24.43	17.82	6.04

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MAINE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 6400 Portland	280	27.81	0.86	0.36	5.85	6.07	75.30	58.57	17.99	35.00	0.91	0.00	1.04	0.70	1.62
<b>Limited Review:</b>															
MSA 0730 Bangor	44	4.37	0.00	0.00	7.18	6.82	86.26	81.82	6.56	11.36	0.42	0.00	0.49	0.45	0.00
MSA 4240 Lewiston/Auburn	32	3.18	0.20	0.00	4.49	3.13	85.35	84.38	9.96	12.50	0.43	0.00	0.00	0.44	0.48
MSA 6450 Portsmouth	11	1.09	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.09	0.00	0.00	0.09	0.00
ME Non-MSA AAs	640	63.56	0.01	0.00	7.82	7.03	76.57	77.03	15.60	15.94	1.34	0.00	2.86	1.44	0.92

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MAINE					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 6400 Portland	1	50.00	19.10	0.00	28.48	0.00	48.53	100.00	3.89	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 0730 Bangor	0	0.00	0.00	0.00	33.01	0.00	56.86	0.00	10.13	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 4240 Lewiston/Auburn	0	0.00	10.16	0.00	41.25	0.00	47.55	0.00	1.03	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6450 Portsmouth	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
ME Non-MSA AAs	1	50.00	0.00	0.00	10.85	0.00	78.87	100.00	10.28	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography : MAINE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002						
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
<b>Full Review:</b>															
MSA 6400 Portland	1,950	38.21	5.89	6.51	17.59	20.41	63.09	59.13	13.42	13.95	4.13	5.10	4.53	4.24	4.83
<b>Limited Review:</b>															
MSA 0730 Bangor	412	8.07	0.00	0.00	18.18	21.61	73.46	72.61	8.37	5.78	2.87	0.00	2.16	2.76	3.39
MSA 4240 Lewiston/Auburn	184	3.61	7.49	11.96	11.24	19.02	74.68	65.76	6.59	3.26	1.65	5.36	2.46	1.47	0.00
MSA 6450 Portsmouth	41	0.80	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.91	0.00	0.00	0.98	0.00
ME Non-MSA AAs	2,530	49.58	0.00	0.04	8.32	8.38	75.89	74.27	15.80	17.31	2.24	0.00	2.65	2.38	2.77

\* Based on 2001 Peer Small Business Data - US

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

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



Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MAINE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
MSA 6400 Portland	3	1.21	2.63	0.00	8.16	0.00	71.32	66.67	17.89	33.33	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 0730 Bangor	13	5.26	0.00	0.00	6.87	0.00	87.02	100.00	6.11	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 4240 Lewiston/Auburn	0	0.00	0.00	0.00	0.00	0.00	89.47	0.00	10.53	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6450 Portsmouth	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
ME Non-MSA AAs	231	93.52	0.00	0.00	9.99	35.93	77.61	64.07	12.40	0.00	5.03	0.00	14.10	4.09	0.00	

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : MAINE					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Purchase 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
<b>Full Review:</b>															
MSA 6400 Portland	264	29.17	17.08	12.98	19.73	27.86	26.29	16.79	36.90	42.37	1.17	2.18	2.06	0.85	0.91
<b>Limited Review:</b>															
MSA 0730 Bangor	33	3.65	19.32	6.06	18.24	18.18	24.83	42.42	37.62	33.33	0.74	0.00	0.87	1.42	0.40
MSA 4240 Lewiston/Auburn	54	5.97	18.81	16.67	17.44	31.48	26.10	29.63	37.66	22.22	1.07	8.70	1.86	0.41	0.67
MSA 6450 Portsmouth	5	0.55	13.53	0.00	19.48	20.00	30.29	20.00	36.71	60.00	0.13	0.00	0.00	0.00	0.27
ME Non-MSA AAs	549	60.66	18.44	10.60	18.85	22.85	24.66	26.14	38.04	40.40	1.71	4.14	2.16	1.76	1.38

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% 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: MAINE								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 6400 Portland	221	10.40	17.08	13.12	19.73	17.65	26.29	25.34	36.90	43.89	5.97	11.54	6.82	3.57	6.18
<b>Limited Review:</b>															
MSA 0730 Bangor	144	6.78	19.32	4.17	18.24	17.36	24.83	25.69	37.62	52.78	6.29	5.00	6.00	3.70	7.95
MSA 4240 Lewiston/Auburn	43	2.02	18.81	4.65	17.44	23.26	26.10	18.60	37.66	53.49	5.49	0.00	15.63	0.00	6.58
MSA 6450 Portsmouth	12	0.56	13.53	8.33	19.48	33.33	30.29	25.00	36.71	33.33	1.59	5.26	0.00	0.00	2.30
ME Non-MSA AAs	1,704	80.23	18.44	11.60	18.85	20.07	24.66	26.60	38.04	41.73	17.36	23.12	15.63	16.89	17.10

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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.

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MAINE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					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****						
<b>Full Review:</b>																
MSA 6400 Portland	280	27.81	17.08	3.93	19.73	10.71	26.29	17.50	36.90	67.86	1.13	0.83	0.80	0.70	1.48	
<b>Limited Review:</b>																
MSA 0730 Bangor	44	4.37	19.32	4.65	18.24	11.63	24.83	34.88	37.62	48.84	0.53	1.16	0.00	0.36	0.65	
MSA 4240 Lewiston/Auburn	32	3.18	18.81	6.25	17.44	18.75	26.10	28.13	37.66	46.88	0.52	1.61	1.53	0.37	0.28	
MSA 6450 Portsmouth	11	1.09	13.53	9.09	19.48	18.18	30.29	18.18	36.71	54.55	0.11	0.00	0.00	0.00	0.21	
ME Non-MSA AAs	640	63.56	18.44	5.78	18.85	18.91	24.66	24.84	38.04	50.47	1.67	1.68	2.79	1.81	1.39	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography : MAINE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 6400 Portland	1,950	38.11	75.36	70.97	78.67	12.41	8.92	4.13	6.91
<b>Limited Review:</b>									
MSA 0730 Bangor	412	8.05	74.46	65.29	69.90	16.75	13.35	2.87	4.77
MSA 4240 Lewiston/Auburn	184	3.60	71.94	58.70	72.28	15.22	12.50	1.65	2.30
MSA 6450 Portsmouth	41	0.80	77.17	82.93	87.80	7.32	4.88	0.91	1.60
ME Non-MSA AAs	2,530	49.44	73.96	71.54	75.97	13.99	10.04	2.24	2.97

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.06% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography : MAINE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 6400 Portland	3	1.21	88.68	66.67	66.67	0.00	33.33	0.00	0.00
<b>Limited Review:</b>									
MSA 0730 Bangor	13	5.26	89.31	15.38	76.92	23.08	0.00	0.00	0.00
MSA 4240 Lewiston/Auburn	0	0.00	90.98	0.00	0.00	0.00	0.00	0.00	0.00
MSA 6450 Portsmouth	0	0.00	89.61	0.00	0.00	0.00	0.00	0.00	0.00
ME Non-MSA AAs	231	93.52	91.70	74.46	58.44	34.63	6.93	5.03	4.01

\* Based on 2001 Peer Small Business Data -- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MAINE				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 6400 Portland	3	4,118	28	7,357	31	11,475	44.38	0	0
<b>Limited Review:</b>									
MSA 0730 Bangor	1	1,124	5	20	6	1,144	4.43	0	0
MSA 4240 Lewiston/Auburn	0	0	4	26	4	26	0.10	0	0
MSA 6450 Portsmouth	0	0	1	13	1	13	0.05	0	0
ME Non-MSA AAs	2	57	13	4,451	15	4,508	17.43	0	0
Statewide/Regional	2	3,569	2	5,120	4	8,689	33.61	0	0

---

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: MAINE				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003									
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
<b>Full Review:</b>																	
MSA 6400 Portland	34.23	18	27.69	0.00	22.22	61.11	16.67	2	4	0	0	- 2	0	3.90	9.80	71.72	14.57
<b>Limited Review:</b>																	
MSA 0730 Bangor	5.24	4	6.15	0.00	25.00	75.00	0.00	0	1	0	- 1	0	0	0.00	14.00	74.11	11.64
MSA 4240 Lewiston/Auburn	4.21	3	4.62	33.33	33.33	33.33	0.00	0	2	0	- 1	- 1	0	1.69	14.41	76.36	7.54
MSA 6450 Portsmouth	1.25	1	1.54	0.00	0.00	100.00	0.00	0	1	0	0	- 1	0	0.00	0.00	98.98	0.00
ME Non-MSA AAs	55.07	39	60.00	0.00	7.69	79.49	12.82	0	8	0	- 1	- 6	- 1	0.00	8.92	76.35	14.69



Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: MCHIGAN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 0440 Ann Arbor	66.98	744	61,102	925	72,927	17	1,132	6	7,097	1,692	142,258	77.53
<b>Limited Review:</b>												
MSA 2160 Detroit	25.50	319	15,162	315	21,385	10	184	0	0	644	36,731	14.33
MI Non-MSA AAs	7.52	132	2,913	57	7,144	1	200	0	0	190	10,257	8.14
Statewide/Regional								3	5,257	3	5,257	

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: MICHIGAN								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 0440 Ann Arbor	187	70.57	0.90	1.07	18.92	33.16	53.26	50.27	26.92	15.51	0.25	0.00	0.58	0.30	0.02
<b>Limited Review:</b>															
MSA 2160 Detroit	61	23.02	0.72	1.64	3.59	6.56	84.25	91.80	11.45	0.00	0.50	0.00	0.74	0.56	0.00
MI Non-MSA AAs	17	6.42	0.00	0.00	0.00	0.00	46.79	70.59	53.21	29.41	1.02	0.00	0.00	1.03	1.01

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 0440 Ann Arbor	316	54.11	0.90	1.90	18.92	50.32	53.26	42.72	26.92	5.06	3.57	0.00	9.38	2.63	1.22	
<b>Limited Review:</b>																
MSA 2160 Detroit	172	29.45	0.72	1.16	3.59	5.23	84.25	90.70	11.45	2.91	2.52	7.69	2.94	2.88	0.00	
MI Non-MSA AAs	96	16.44	0.00	0.00	0.00	0.00	46.79	44.79	53.21	55.21	15.50	0.00	0.00	11.94	19.35	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MICHIGAN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 0440 Ann Arbor	239	69.48	0.90	1.26	18.92	26.78	53.26	43.93	26.92	28.03	0.25	0.29	0.58	0.23	0.17
<b>Limited Review:</b>															
MSA 2160 Detroit	86	25.00	0.72	1.16	3.59	4.65	84.25	93.02	11.45	1.16	0.25	0.00	0.17	0.31	0.00
MI Non-MSA AAs	19	5.52	0.00	0.00	0.00	0.00	46.79	52.63	53.21	47.37	0.41	0.00	0.00	0.45	0.37

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MICHIGAN					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% of MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 0440 Ann Arbor	1	100.00	15.50	0.00	34.87	100.00	29.30	0.00	20.32	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 2160 Detroit	0	0.00	0.17	0.00	12.39	0.00	66.82	0.00	20.62	0.00	0.00	0.00	0.00	0.00	0.00	
MI Non-MSA AAs	0	0.00	0.00	0.00	0.00	0.00	83.95	0.00	16.05	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Business Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
MSA 0440 Ann Arbor	925	71.32	7.26	4.65	17.97	26.16	46.26	41.51	28.52	27.68	1.07	1.02	1.71	1.04	0.84	
<b>Limited Review:</b>																
MSA 2160 Detroit	315	24.29	0.77	0.00	7.87	4.13	82.22	93.02	9.14	2.86	0.28	0.05	0.13	0.51	0.10	
MI Non-MSA AAs	57	4.39	0.00	0.00	0.00	0.00	56.89	61.40	43.11	38.60	0.72	0.00	0.00	0.84	0.72	

\* Based on 2001 Peer Small Business Data - US

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA 0440 Ann Arbor	17	60.71	0.61	0.00	20.56	29.41	55.29	58.82	23.54	11.76	5.97	0.00	4.88	8.33	0.00
<b>Limited Review:</b>															
MSA 2160 Detroit	10	35.71	0.00	0.00	0.36	0.00	95.14	100.00	4.50	0.00	3.28	0.00	0.00	3.64	0.00
MI Non-MSA AAs	1	3.57	0.00	0.00	0.00	0.00	41.41	0.00	58.59	100.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography: MICHIGAN						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase 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
<b>Full Review:</b>															
MSA 0440 Ann Arbor	187	70.57	19.21	24.06	18.43	33.69	24.78	20.32	37.58	21.93	0.27	0.58	0.47	0.20	0.14
<b>Limited Review:</b>															
MSA 2160 Detroit	61	23.02	19.21	21.67	17.30	38.33	24.81	25.00	38.68	15.00	0.56	0.91	0.73	0.33	0.49
MI Non-MSA AAs	17	6.42	12.41	11.76	15.77	35.29	22.77	29.41	49.05	23.53	1.22	0.00	1.08	2.17	0.81

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% 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.



Institution ID: KeyBank NA

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

Borrower Distribution: HOME IMPROVEMENT			Geography: MICHIGAN								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 0440 Ann Arbor	316	54.11	19.21	29.11	18.43	27.22	24.78	27.85	37.58	15.82	3.63	7.36	4.15	3.44	1.76
<b>Limited Review:</b>															
MSA 2160 Detroit	172	29.45	19.21	15.12	17.30	28.49	24.81	29.07	38.68	27.33	2.55	2.22	1.94	2.14	3.77
MI Non-MSA AAs	96	16.44	12.41	11.46	15.77	17.71	22.77	21.88	49.05	48.96	15.63	22.22	13.79	14.29	15.09

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 0440 Ann Arbor	240	69.57	19.21	16.67	18.43	24.17	24.78	23.75	37.58	35.42	0.29	0.64	0.42	0.21	0.22
<b>Limited Review:</b>															
MSA 2160 Detroit	86	24.93	19.21	10.47	17.30	32.56	24.81	24.42	38.68	32.56	0.28	0.41	0.24	0.37	0.20
MI Non-MSA AAs	19	5.51	12.41	0.00	15.77	15.79	22.77	21.05	49.05	63.16	0.46	0.00	0.64	0.00	0.65

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MICHIGAN		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 0440 Ann Arbor	925	71.32	77.19	75.03	82.59	8.54	8.86	1.07	1.64
<b>Limited Review:</b>									
MSA 2160 Detroit	315	24.29	79.63	79.68	83.81	10.48	5.71	0.28	0.46
MI Non-MSA AAs	57	4.39	79.93	63.16	68.42	14.04	17.54	0.72	0.62

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.15% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography : MICHIGAN			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 0440 Ann Arbor	17	60.71	95.32	64.71	94.12	0.00	5.88	5.97	5.08
<b>Limited Review:</b>									
MSA 2160 Detroit	10	35.71	94.96	100.00	100.00	0.00	0.00	3.28	3.70
MI Non-MSA AAs	1	3.57	99.22	100.00	0.00	100.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data -- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MICHIGAN				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 0440 Ann Arbor	1	0	48	4,321	49	4,321	25.02	0	0
<b>Limited Review:</b>									
MSA 2160 Detroit	1	256	2	132	3	388	2.25	0	0
MI Non-MSA AAs	0	0	1	64	1	64	0.37	0	0
Statewide/Regional	3	1,495	6	11,004	9	12,499	72.36	0	0

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MICHIGAN				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 0440 Ann Arbor	77.53	16	69.57	6.25	37.50	43.75	12.50	1	4	0	0	- 4	1	7.83	22.12	45.47	24.21
<b>Limited Review:</b>																	
MSA 2160 Detroit	14.33	5	21.74	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.08	5.67	81.35	11.90
MI Non-MSA AAs	8.14	2	8.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	52.17	47.83

## Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 1280 Buffalo/Niagara Falls	19.31	2,646	81,707	2,632	229,366	2	215	11	7,861	5,291	319,149	25.63
<b>Limited Review:</b>												
MSA 0160 Albany	16.62	1,301	53,973	3,233	304,468	10	1,552	11	8,865	4,555	368,858	21.41
MSA 2281 Dutchess	2.93	410	17,040	390	42,992	0	0	15	13,437	815	73,649	3.18
MSA 2975 Glens Falls	0.51	40	5,252	97	10,413	2	40	0	0	139	15,705	0.36
MSA 3610 Jamestown	2.64	375	10,007	333	33,234	13	1,039	0	0	721	44,280	2.40
MSA 5600 NY, NY	1.85	96	6,498	410	32,010	0	0	7	33,383	513	71,891	4.74
MSA 5660 Newburgh	3.86	471	19,329	579	45,109	5	357	2	945	1,057	65,740	5.31
MSA 6840 Rochester	9.91	1,530	39,618	1,154	167,624	25	2,933	1	2,972	2,710	213,147	4.83
MSA 8160 Syracuse	17.82	2,370	58,368	2,419	275,097	82	11,226	9	14,032	4,880	358,722	11.80
MSA 8680 Utica/Rome	1.98	182	4,932	360	29,273	0	0	4	6,830	546	41,035	0.48
NY Non-MSA AAs	22.58	3,640	67,762	2,353	199,315	181	15,629	12	20,846	6,186	303,552	19.86
Statewide/Regional								7	22,442	7	22,442	

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

<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: NEW YORK								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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	
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	609	27.88	3.21	1.97	12.70	21.02	54.51	56.49	29.58	20.53	0.75	0.92	2.37	0.74	0.42	
<b>Limited Review:</b>																
MSA 0160 Albany	241	11.03	0.98	1.24	15.87	17.01	58.00	56.43	25.15	25.31	0.20	0.83	0.40	0.18	0.15	
MSA 2281 Dutchess	145	6.64	1.50	2.76	8.81	11.03	73.20	82.76	16.48	3.45	0.42	2.47	0.73	0.41	0.13	
MSA 2975 Glens Falls	10	0.46	0.00	0.00	7.23	0.00	64.13	80.00	28.64	20.00	0.25	0.00	0.00	0.25	0.28	
MSA 3610 Jamestown	51	2.34	0.90	0.00	8.06	3.92	84.12	96.08	6.93	0.00	0.51	0.00	0.00	0.60	0.00	
MSA 5600 NY, NY	11	0.50	0.05	0.00	1.33	0.00	7.72	0.00	90.90	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 5660 Newburgh	95	4.35	1.22	4.21	8.97	16.84	55.02	70.53	34.79	8.42	0.36	1.25	0.68	0.47	0.11	
MSA 6840 Rochester	270	12.36	2.58	4.44	11.79	26.67	59.23	52.22	26.41	16.67	0.21	1.47	0.41	0.23	0.07	
MSA 8160 Syracuse	281	12.87	1.24	1.07	9.65	9.61	63.48	65.12	25.63	24.20	0.47	0.00	0.23	0.55	0.41	
MSA 8680 Utica/Rome	41	1.88	0.30	0.00	9.97	17.07	56.09	56.10	33.64	26.83	0.52	0.00	0.52	0.60	0.41	
NY Non-MSA AAs	430	19.69	0.05	0.00	9.13	12.09	72.63	77.91	18.20	10.00	0.82	0.00	1.31	0.95	0.30	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW YORK				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low -Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ*** Units	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	1,728	18.19	3.21	4.34	12.70	16.55	54.51	55.09	29.58	24.02	13.70	20.49	17.40	13.56	11.32	
<b>Limited Review:</b>																
MSA 0160 Albany	868	9.14	0.98	1.73	15.87	19.82	58.00	53.57	25.15	24.88	9.36	6.25	10.21	8.69	10.46	
MSA 2281 Dutchess	233	2.45	1.50	1.29	8.81	10.30	73.20	76.39	16.48	12.02	5.49	0.00	3.28	6.14	4.00	
MSA 2975 Glens Falls	19	0.20	0.00	0.00	7.23	10.53	64.13	47.37	28.64	42.11	1.66	0.00	0.00	0.81	4.65	
MSA 3610 Jamestown	286	3.01	0.90	1.75	8.06	7.34	84.12	88.46	6.93	2.45	8.49	20.00	14.00	8.38	0.00	
MSA 5600 NY, NY	71	0.75	0.05	0.00	1.33	1.41	7.72	8.45	90.90	90.14	0.90	0.00	1.64	0.93	0.88	
MSA 5660 Newburgh	305	3.21	1.22	3.93	8.97	6.89	55.02	52.13	34.79	37.05	6.17	28.57	7.35	6.07	5.33	
MSA 6840 Rochester	1,159	12.20	2.58	1.38	11.79	26.49	59.23	56.26	26.41	15.88	6.10	1.16	10.99	5.48	5.03	
MSA 8160 Syracuse	1,799	18.93	1.24	0.89	9.65	9.39	63.48	68.04	25.63	21.68	12.89	11.54	11.46	13.41	12.01	
MSA 8680 Utica/Rome	128	1.35	0.30	0.78	9.97	7.81	56.09	59.38	33.64	32.03	1.44	0.00	0.75	1.73	1.13	
NY Non-MSA AAs	2,905	30.58	0.05	0.00	9.13	15.42	72.63	75.52	18.20	9.05	16.75	0.00	18.24	17.38	11.65	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOMEMORTGAGE REFINANCE				Geography: NEW YORK				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	309	22.51	3.21	2.27	12.70	11.97	54.51	50.81	29.58	34.95	0.53	0.49	0.78	0.53	0.49	
<b>Limited Review:</b>																
MSA 0160 Albany	191	13.91	0.98	0.52	15.87	9.42	58.00	50.26	25.15	39.79	0.22	0.00	0.11	0.22	0.27	
MSA 2281 Dutchess	32	2.33	1.50	0.00	8.81	6.25	73.20	75.00	16.48	18.75	0.05	0.00	0.00	0.02	0.15	
MSA 2975 Glens Falls	11	0.80	0.00	0.00	7.23	0.00	64.13	81.82	28.64	18.18	0.08	0.00	0.00	0.00	0.24	
MSA 3610 Jamestown	38	2.77	0.90	2.63	8.06	10.53	84.12	81.58	6.93	5.26	0.35	0.00	0.72	0.36	0.00	
MSA 5600 NY, NY	14	1.02	0.05	0.00	1.33	0.00	7.72	0.00	90.90	100.00	0.01	0.00	0.00	0.00	0.01	
MSA 5660 Newburgh	71	5.17	1.22	0.00	8.97	9.86	55.02	53.52	34.79	36.62	0.25	0.00	0.25	0.27	0.24	
MSA 6840 Rochester	101	7.36	2.58	0.00	11.79	15.84	59.23	49.50	26.41	34.65	0.12	0.00	0.44	0.08	0.13	
MSA 8160 Syracuse	290	21.12	1.24	0.69	9.65	6.21	63.48	62.07	25.63	31.03	0.63	0.00	0.52	0.75	0.45	
MSA 8680 Utica/Rome	13	0.95	0.30	0.00	9.97	0.00	56.09	61.54	33.64	38.46	0.03	0.00	0.00	0.00	0.08	
NY Non-MSA AAs	303	22.07	0.05	0.00	9.13	10.23	72.63	77.89	18.20	11.88	0.75	0.00	1.02	0.85	0.34	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW YORK				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% of MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	0	0.00	14.58	0.00	15.32	0.00	44.02	0.00	26.07	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 0160 Albany	1	50.00	10.26	100.00	20.35	0.00	49.63	0.00	19.76	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2281 Dutchess	0	0.00	12.51	0.00	20.69	0.00	63.50	0.00	3.30	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2975 Glens Falls	0	0.00	0.00	0.00	14.69	0.00	39.17	0.00	46.15	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 3610 Jamestown	0	0.00	19.04	0.00	12.66	0.00	58.76	0.00	9.54	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5600 NY, NY	0	0.00	2.13	0.00	13.37	0.00	25.77	0.00	58.73	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5660 Newburgh	0	0.00	7.56	0.00	20.44	0.00	53.57	0.00	18.43	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6840 Rochester	0	0.00	9.56	0.00	18.28	0.00	53.43	0.00	18.73	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 8160 Syracuse	0	0.00	19.06	0.00	28.03	0.00	36.15	0.00	16.76	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 8680 Utica/Rome	0	0.00	10.48	0.00	39.53	0.00	33.22	0.00	16.77	0.00	0.00	0.00	0.00	0.00	0.00	
NY Non-MSA AAs	1	50.00	1.90	0.00	20.96	0.00	62.15	0.00	14.99	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography : NEW YORK															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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
<b>Full Review:</b>															
MSA 1280 Buffalo/Niagara Falls	2,632	18.90	5.52	3.55	14.84	14.62	47.47	48.55	32.17	33.28	2.50	1.73	2.89	2.49	2.70
<b>Limited Review:</b>															
MSA 0160 Albany	3,233	23.22	9.17	7.40	15.97	14.98	50.56	49.58	24.30	28.04	3.21	4.29	3.69	3.17	3.41
MSA 2281 Dutchess	390	2.80	7.41	7.95	13.55	18.97	65.15	67.95	13.89	5.13	1.18	1.07	2.67	1.31	0.42
MSA 2975 Glens Falls	97	0.70	0.00	0.00	7.05	12.37	63.49	51.55	29.46	36.08	1.02	0.00	0.76	0.80	1.75
MSA 3610 Jamestown	333	2.39	9.71	10.51	10.31	14.11	72.18	69.67	7.80	5.71	3.20	2.53	1.92	3.93	1.69
MSA 5600 NY, NY	410	2.94	1.92	0.73	4.38	2.44	10.84	9.02	82.87	87.80	0.16	0.00	0.07	0.18	0.17
MSA 5660 Newburgh	579	4.16	3.08	4.32	15.57	13.47	49.11	52.50	32.25	29.71	1.24	1.02	0.92	1.17	1.77
MSA 6840 Rochester	1,154	8.29	4.71	5.97	14.22	13.96	54.40	56.01	26.66	24.06	0.76	1.18	0.69	0.72	0.87
MSA 8160 Syracuse	2,419	17.37	7.19	7.23	12.72	12.90	55.50	55.39	24.60	24.47	2.93	3.10	2.61	3.05	3.44
MSA 8680 Utica/Rome	360	2.59	4.37	1.69	17.80	23.10	47.42	41.41	30.41	33.80	1.46	1.79	1.84	0.85	2.36
NY Non-MSA AAs	2,353	16.90	1.48	2.30	10.78	10.55	67.50	70.43	20.23	16.72	2.29	9.93	2.22	2.53	2.28

\* Based on 2001 Peer Small Business Data - US

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: NEW YORK				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of... Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	2	0.63	0.53	0.00	4.46	0.00	64.27	50.00	30.74	50.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 0160 Albany	10	3.13	0.39	10.00	23.38	10.00	58.64	80.00	17.60	0.00	1.47	0.00	0.00	7.41	0.00	
MSA 2281 Dutchess	0	0.00	0.34	0.00	12.41	0.00	75.17	0.00	12.07	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 2975 Glens Falls	2	0.63	0.00	0.00	4.55	0.00	57.95	0.00	37.50	100.00	50.00	0.00	0.00	0.00	100.00	
MSA 3610 Jamestown	13	4.06	0.95	0.00	0.95	0.00	95.84	100.00	2.27	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5600 NY, NY	0	0.00	0.35	0.00	1.76	0.00	8.27	0.00	89.62	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5660 Newburgh	5	1.56	0.69	0.00	3.72	0.00	52.34	40.00	43.25	60.00	11.11	0.00	0.00	16.67	0.00	
MSA 6840 Rochester	25	7.81	0.67	4.00	9.33	16.00	72.18	80.00	17.82	0.00	0.56	0.00	0.00	0.71	0.00	
MSA 8160 Syracuse	82	25.62	0.43	0.00	6.09	6.10	72.98	84.15	20.50	9.76	5.80	0.00	0.00	5.44	21.43	
MSA 8680 Utica/Rome	0	0.00	0.19	0.00	1.95	0.00	69.98	0.00	27.88	0.00	0.00	0.00	0.00	0.00	0.00	
NY Non-MSA AAs	181	56.56	0.36	0.00	9.52	11.05	76.53	82.32	13.59	6.63	1.90	0.00	0.90	2.21	0.00	

\* Based on 2001 Peer Small Business Data - US

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

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

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

Borrower Distribution: HOME PURCHASE		Geography : NEW YORK										Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Purchase 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	
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	609	27.88	19.56	22.24	18.17	37.40	24.00	23.56	38.27	16.80	0.93	3.08	1.20	0.83	0.38	
<b>Limited Review:</b>																
MSA 0160 Albany	241	11.03	17.62	16.25	19.08	33.75	25.49	24.17	37.80	25.83	0.24	0.78	0.42	0.23	0.07	
MSA 2281 Dutchess	145	6.64	16.73	25.52	19.15	44.83	28.13	22.76	35.99	6.90	0.51	2.04	1.41	0.36	0.05	
MSA 2975 Glens Falls	10	0.46	16.11	0.00	17.74	30.00	26.01	30.00	40.13	40.00	0.29	0.00	1.18	0.37	0.00	
MSA 3610 Jamestown	51	2.34	19.40	9.80	18.10	15.69	23.68	37.25	38.82	37.25	0.62	3.51	0.32	0.27	0.74	
MSA 5600 NY, NY	11	0.50	9.85	9.09	9.35	9.09	15.75	18.18	65.04	63.64	0.00	0.00	0.00	0.00	0.00	
MSA 5660 Newburgh	95	4.35	17.67	15.79	17.38	36.84	25.13	30.53	39.82	16.84	0.43	2.40	0.68	0.61	0.16	
MSA 6840 Rochester	270	12.36	18.55	35.56	18.04	34.07	24.84	15.56	38.56	14.81	0.25	1.01	0.30	0.12	0.13	
MSA 8160 Syracuse	281	12.87	18.58	16.37	18.36	32.38	24.74	23.84	38.32	27.40	0.58	1.38	0.75	0.56	0.38	
MSA 8680 Utica/Rome	41	1.88	17.30	21.95	18.38	46.34	23.79	7.32	40.53	24.39	0.64	3.17	1.44	0.16	0.21	
NY Non-MSA AAs	430	19.69	18.64	10.28	18.22	25.93	23.72	34.11	39.41	29.67	0.99	2.45	1.30	1.29	0.63	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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 YORK					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA 1280 Buffalo/Niagara Falls	1,728	18.19	19.56	11.83	18.17	25.45	24.00	30.43	38.27	32.29	14.63	12.87	17.41	15.16	13.34	
<b>Limited Review:</b>																
MSA 0160 Albany	868	9.13	17.62	13.76	19.08	27.05	25.49	27.17	37.80	32.02	9.73	13.02	9.45	9.06	9.44	
MSA 2281 Dutchess	233	2.45	16.73	13.30	19.15	21.03	28.13	26.61	35.99	39.06	5.83	10.20	7.25	5.13	5.00	
MSA 2975 Glens Falls	19	0.20	16.11	0.00	17.74	21.05	26.01	21.05	40.13	57.89	1.73	0.00	3.03	1.82	1.45	
MSA 3610 Jamestown	286	3.01	19.40	8.04	18.10	19.58	23.68	25.17	38.82	47.20	10.88	9.52	8.06	8.67	14.29	
MSA 5600 NY, NY	71	0.75	9.85	5.63	9.35	8.45	15.75	26.76	65.04	59.15	1.00	1.39	2.34	1.19	0.79	
MSA 5660 Newburgh	305	3.21	17.67	15.41	17.38	21.64	25.13	22.95	39.82	40.00	6.55	19.23	7.52	7.17	4.64	
MSA 6840 Rochester	1,159	12.20	18.55	8.56	18.04	27.94	24.84	29.07	38.56	34.43	6.46	4.35	8.48	6.54	5.62	
MSA 8160 Syracuse	1,799	18.93	18.58	10.02	18.36	22.93	24.74	25.54	38.32	41.51	13.38	14.23	13.43	10.92	14.79	
MSA 8680 Utica/Rome	128	1.35	17.30	5.47	18.38	21.09	23.79	23.44	40.53	50.00	1.48	1.94	0.85	1.40	1.74	
NY Non-MSA AAs	2,906	30.58	18.64	9.92	18.22	24.69	23.72	28.99	39.41	36.40	17.66	15.71	21.83	18.04	15.59	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.1% 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 YORK						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1280 Buffalo/Niagara Falls	309	22.51	19.56	5.19	18.17	22.08	24.00	33.12	38.27	39.61	0.64	0.30	0.77	0.72	0.58
<b>Limited Review:</b>															
MSA 0160 Albany	191	13.91	17.62	5.26	19.08	14.74	25.49	26.84	37.80	53.16	0.27	0.16	0.14	0.25	0.34
MSA 2281 Dutchess	32	2.33	16.73	9.38	19.15	21.88	28.13	15.63	35.99	53.13	0.05	0.00	0.00	0.06	0.07
MSA 2975 Glens Falls	11	0.80	16.11	0.00	17.74	18.18	26.01	18.18	40.13	63.64	0.10	0.00	0.00	0.00	0.18
MSA 3610 Jamestown	38	2.77	19.40	2.63	18.10	15.79	23.68	13.16	38.82	68.42	0.48	0.00	0.81	0.00	0.68
MSA 5600 NY, NY	14	1.02	9.85	7.14	9.35	7.14	15.75	21.43	65.04	64.29	0.01	0.00	0.08	0.03	0.00
MSA 5660 Newburgh	71	5.17	17.67	5.63	17.38	14.08	25.13	26.76	39.82	53.52	0.30	0.58	0.43	0.33	0.25
MSA 6840 Rochester	101	7.36	18.55	9.90	18.04	21.78	24.84	18.81	38.56	49.50	0.14	0.11	0.20	0.09	0.15
MSA 8160 Syracuse	290	21.12	18.58	6.21	18.36	15.52	24.74	21.03	38.32	57.24	0.75	1.25	0.63	0.93	0.67
MSA 8680 Utica/Rome	13	0.95	17.30	0.00	18.38	15.38	23.79	30.77	40.53	53.85	0.04	0.00	0.00	0.00	0.07
NY Non-MSA AAs	303	22.07	18.64	6.95	18.22	20.86	23.72	26.82	39.41	45.36	0.91	0.87	1.08	1.11	0.79

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by BANK.

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

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



Institution ID: KeyBank NA

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEW YORK		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1280 Buffalo/Niagara Falls	2,632	18.85	71.87	71.35	79.41	12.16	8.43	2.50	4.73
<b>Limited Review:</b>									
MSA 0160 Albany	3,233	23.16	71.74	69.84	78.35	12.06	9.59	3.21	5.23
MSA 2281 Dutchess	390	2.79	73.28	66.92	75.90	12.05	12.05	1.18	2.10
MSA 2975 Glens Falls	97	0.69	74.92	75.26	74.23	14.43	11.34	1.02	1.99
MSA 3610 Jamestown	333	2.39	75.29	71.47	76.88	11.11	12.01	3.20	6.14
MSA 5600 NY, NY	410	2.94	66.39	78.78	84.15	7.32	8.54	0.16	0.27
MSA 5660 Newburgh	579	4.15	72.98	72.54	82.56	10.36	7.08	1.24	2.28
MSA 6840 Rochester	1,154	8.27	74.13	60.57	67.07	16.46	16.46	0.76	0.93
MSA 8160 Syracuse	2,419	17.33	74.25	64.61	72.72	14.01	13.27	2.93	4.33
MSA 8680 Utica/Rome	360	2.58	75.73	76.94	82.22	10.00	7.78	1.46	2.37
NY Non-MSA AAs	2,353	16.86	74.33	72.50	81.85	10.75	7.39	2.29	3.57

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.04% 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 YORK			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1280 Buffalo/Niagara Falls	2	0.63	90.88	0.00	50.00	50.00	0.00	0.00	0.00
<b>Limited Review:</b>									
MSA 0160 Albany	10	3.13	94.16	50.00	60.00	10.00	30.00	1.47	1.60
MSA 2281 Dutchess	0	0.00	93.28	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2975 Glens Falls	2	0.63	90.91	100.00	100.00	0.00	0.00	50.00	50.00
MSA 3610 Jamestown	13	4.06	95.65	53.85	84.62	7.69	7.69	0.00	0.00
MSA 5600 NY, NY	0	0.00	91.38	0.00	0.00	0.00	0.00	0.00	0.00
MSA 5660 Newburgh	5	1.56	92.84	80.00	60.00	40.00	0.00	11.11	0.00
MSA 6840 Rochester	25	7.81	91.40	44.00	64.00	28.00	8.00	0.56	0.16
MSA 8160 Syracuse	82	25.62	91.87	75.61	59.76	21.95	18.29	5.80	3.31
MSA 8680 Utica/Rome	0	0.00	96.10	0.00	0.00	0.00	0.00	0.00	0.00
NY Non-MSA AAs	181	56.56	93.90	86.74	72.38	20.44	7.18	1.90	1.63

\* Based on 2001 Peer Small Business Data-- US

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

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

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

Institution ID: KeyBank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 1280 Buffalo/Niagara Falls	4	2,648	68	5,678	72	8,326	10.86	0	0
<b>Limited Review:</b>									
MSA 0160 Albany	3	3,985	64	7,376	67	11,361	14.82	0	0
MSA 2281 Dutchess	1	130	11	24	12	154	0.20	0	0
MSA 2975 Glens Falls	0	0	0	0	0	0	0.00	0	0
MSA 3610 Jamestown	0	0	8	22	8	22	0.03	0	0
MSA 5600 NY, NY	6	7,123	21	4,035	27	11,158	14.55	0	0
MSA 5660 Newburgh	6	2,896	29	4,063	35	6,959	9.07	0	0
MSA 6840 Rochester	12	2,098	52	2,638	64	4,736	6.18	0	0
MSA 8160 Syracuse	6	1,961	54	6,019	60	7,980	10.41	0	0
MSA 8680 Utica/Rome	1	974	14	14,131	15	15,105	19.70	0	0
NY Non-MSA AAs	3	963	38	4,470	41	5,433	7.09	0	0
Statewide/Regional	3	5,401	5	33	8	5,434	7.09	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEW YORK				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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				
<b>Full Review:</b>																	
MSA 1280 Buffalo/Niagara Falls	25.63	37	18.23	0.00	16.22	59.46	24.32	1	5	- 1	- 1	- 1	- 1	6.91	16.40	50.37	25.68
<b>Limited Review:</b>																	
MSA 0160 Albany	21.41	45	22.17	13.33	8.89	51.11	26.67	1	6	0	0	- 4	- 1	3.15	19.38	54.73	22.53
MSA 2281 Dutchess	3.18	6	2.96	16.67	16.67	66.67	0.00	0	0	0	0	0	0	3.71	11.95	67.99	14.59
MSA 2975 Glens Falls	0.36	1	0.49	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	8.21	63.82	27.97
MSA 3610 Jamestown	2.40	6	2.96	33.33	0.00	50.00	16.67	0	0	0	0	0	0	2.81	10.49	78.63	8.07
MSA 5600 NY, NY	4.74	5	2.46	0.00	0.00	40.00	60.00	0	2	- 1	0	0	- 1	0.60	6.30	13.23	79.61
MSA 5660 Newburgh	5.31	9	4.43	11.11	0.00	55.56	33.33	0	2	0	0	- 2	0	4.49	14.38	51.42	29.70
MSA 6840 Rochester	4.83	15	7.39	0.00	26.67	53.33	20.00	1	1	0	0	0	0	6.20	14.29	56.36	22.90
MSA 8160 Syracuse	11.80	30	14.78	6.67	13.33	60.00	20.00	0	3	- 1	- 1	- 1	0	5.90	13.93	57.76	22.11
MSA 8680 Utica/Rome	0.48	3	1.48	33.33	0.00	33.33	33.33	0	0	0	0	0	0	1.27	19.81	49.98	27.90
NY Non-MSA AAs	19.86	46	22.66	4.35	10.87	69.57	15.22	0	8	0	- 1	- 6	- 1	0.72	12.52	68.72	17.45

## Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 1680 Cleveland/Lorain/Elyria	36.60	6,735	428,313	5,474	667,527	57	5,160	59	66,103	12,325	1,167,103	72.61
<b>Limited Review:</b>												
MSA 0080 Akron	9.10	1,342	86,521	1,712	207,234	8	742	3	810	3,065	295,307	3.05
MSA 1320 Canton	6.42	965	47,634	1,189	132,412	1	35	5	7,753	2,160	187,834	3.16
MSA 1640 Cincinnati	7.84	858	86,099	1,765	187,929	1	35	16	19,046	2,640	293,109	2.83
MSA 1840 Columbus	9.47	938	70,899	2,229	229,296	0	0	21	29,268	3,188	329,463	3.57
MSA 2000 Dayton	9.06	1,547	83,692	1,445	182,985	44	3,931	14	14,949	3,050	285,557	4.63
MSA 3200 Hamilton/Middletown	1.87	219	10,134	408	46,693	0	0	3	7,200	630	64,027	0.58
MSA 4800 Mansfield	1.62	176	4,977	368	34,707	2	105	0	0	546	39,789	1.04
MSA 8400 Toledo	10.39	1,765	119,122	1,724	172,554	2	550	9	6,118	3,500	298,344	5.17
MSA 9320 Youngstown	3.81	676	23,034	602	90,457	3	816	3	5,100	1,284	119,407	0.77
OH Non-MSA AAs	3.82	728	32,511	546	49,785	11	784	0	0	1,285	83,080	2.59
Statewide/Regional								7	324,000	7	324,000	

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

\*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE		Geography: OHIO								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 1680 Cleveland/Lorain/Elyria	1,738	41.49	5.27	16.80	11.31	26.99	49.98	33.66	33.44	22.55	0.74	3.02	1.78	0.54	0.43
<b>Limited Review:</b>															
MSA 0080 Akron	278	6.64	3.13	0.72	14.12	18.35	58.64	47.48	24.10	33.45	0.34	0.29	0.29	0.36	0.34
MSA 1320 Canton	169	4.03	1.90	4.73	12.70	17.16	64.05	52.07	21.35	26.04	0.45	3.88	1.10	0.24	0.48
MSA 1640 Cincinnati	280	6.68	2.61	5.36	11.54	13.57	49.36	48.21	36.49	32.86	0.15	0.46	0.24	0.14	0.12
MSA 1840 Columbus	393	9.38	5.45	19.08	17.50	18.83	38.69	36.39	38.36	25.70	0.28	0.97	0.37	0.31	0.16
MSA 2000 Dayton	406	9.69	4.53	9.85	14.10	16.26	53.50	48.03	27.87	25.86	0.51	2.58	0.52	0.42	0.42
MSA 3200 Hamilton/Middletown	58	1.38	3.54	1.72	18.21	20.69	49.47	50.00	28.79	27.59	0.25	0.50	0.50	0.19	0.21
MSA 4800 Mansfield	21	0.50	1.48	0.00	11.76	0.00	50.34	57.14	36.42	42.86	0.20	0.00	0.00	0.20	0.23
MSA 8400 Toledo	578	13.80	3.63	5.54	14.99	21.80	57.47	44.12	23.92	28.55	0.85	2.10	0.98	0.65	1.08
MSA 9320 Youngstown	83	1.98	5.09	2.41	15.92	10.84	58.35	56.63	20.64	30.12	0.17	0.00	0.46	0.18	0.06
OH Non-MSA AAs	185	4.42	0.00	0.00	2.76	3.24	64.70	62.16	32.54	34.59	0.55	0.00	1.52	0.54	0.52

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography : OHIO								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 1680 Cleveland/Lorain/Elyria	3,623	44.16	5.27	14.19	11.31	18.96	49.98	47.94	33.44	18.91	11.48	18.99	14.20	10.22	9.86
<b>Limited Review:</b>															
MSA 0080 Akron	677	8.25	3.13	9.75	14.12	22.90	58.64	53.18	24.10	14.18	6.27	16.85	7.08	5.67	5.00
MSA 1320 Canton	560	6.83	1.90	2.68	12.70	14.82	64.05	67.68	21.35	14.82	11.40	18.18	11.98	11.51	9.80
MSA 1640 Cincinnati	339	4.13	2.61	0.29	11.54	12.98	49.36	54.57	36.49	32.15	1.11	0.93	2.07	1.21	0.61
MSA 1840 Columbus	392	4.78	5.45	3.32	17.50	14.80	38.69	46.94	38.36	34.95	2.70	3.40	1.82	3.08	2.59
MSA 2000 Dayton	797	9.71	4.53	7.28	14.10	19.57	53.50	61.10	27.87	12.05	5.62	7.74	8.98	6.18	2.18
MSA 3200 Hamilton/Middletown	120	1.46	3.54	5.83	18.21	27.50	49.47	51.67	28.79	15.00	2.07	2.17	3.85	2.36	0.51
MSA 4800 Mansfield	114	1.39	1.48	2.63	11.76	14.91	50.34	50.88	36.42	31.58	6.22	20.00	4.48	6.32	5.93
MSA 8400 Toledo	734	8.95	3.63	7.63	14.99	20.71	57.47	54.50	23.92	17.17	8.39	17.07	10.96	7.34	6.82
MSA 9320 Youngstown	470	5.73	5.09	7.23	15.92	13.83	58.35	63.19	20.64	15.74	5.62	19.15	6.45	5.11	4.09
OH Non-MSA AAs	379	4.62	0.00	0.00	2.76	3.17	64.70	53.83	32.54	43.01	8.14	0.00	9.38	7.00	10.20

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units**	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 1680 Cleveland/Lorain/Elyria	1,371	38.60	5.27	7.59	11.31	12.11	49.98	37.20	33.44	43.11	0.54	0.82	0.67	0.38	0.67	
<b>Limited Review:</b>																
MSA 0080 Akron	387	10.90	3.13	4.91	14.12	13.70	58.64	47.55	24.10	33.85	0.31	0.10	0.22	0.28	0.46	
MSA 1320 Canton	236	6.64	1.90	0.85	12.70	11.02	64.05	58.47	21.35	29.66	0.47	0.00	0.30	0.50	0.52	
MSA 1640 Cincinnati	239	6.73	2.61	1.26	11.54	9.21	49.36	45.19	36.49	44.35	0.12	0.00	0.09	0.11	0.16	
MSA 1840 Columbus	153	4.31	5.45	5.88	17.50	15.69	38.69	37.91	38.36	40.52	0.14	0.12	0.24	0.15	0.10	
MSA 2000 Dayton	344	9.68	4.53	4.94	14.10	13.08	53.50	50.29	27.87	31.69	0.33	0.16	0.28	0.37	0.31	
MSA 3200 Hamilton/Middletown	41	1.15	3.54	0.00	18.21	17.07	49.47	51.22	28.79	31.71	0.06	0.00	0.09	0.04	0.10	
MSA 4800 Mansfield	41	1.15	1.48	2.44	11.76	7.32	50.34	51.22	36.42	39.02	0.32	0.00	0.28	0.41	0.24	
MSA 8400 Toledo	453	12.75	3.63	3.09	14.99	12.14	57.47	44.59	23.92	40.18	0.48	0.41	0.49	0.39	0.64	
MSA 9320 Youngstown	123	3.46	5.09	0.81	15.92	4.07	58.35	65.04	20.64	30.08	0.30	0.00	0.08	0.33	0.34	
OH Non-MSA AAs	164	4.62	0.00	0.00	2.76	4.88	64.70	51.22	32.54	43.90	0.29	0.00	0.94	0.19	0.43	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography : OHIO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1680 Cleveland/Lorain/Elyria	1	100.00	17.35	0.00	12.95	0.00	47.42	100.00	22.28	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MSA 0080 Akron	0	0.00	10.37	0.00	18.36	0.00	53.54	0.00	17.74	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1320 Canton	0	0.00	12.17	0.00	10.82	0.00	43.59	0.00	33.41	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1640 Cincinnati	0	0.00	20.27	0.00	19.54	0.00	43.34	0.00	16.85	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1840 Columbus	0	0.00	17.98	0.00	25.51	0.00	33.92	0.00	22.58	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2000 Dayton	0	0.00	12.29	0.00	21.36	0.00	46.19	0.00	20.15	0.00	0.00	0.00	0.00	0.00	0.00
MSA 3200 Hamilton/Middletown	0	0.00	6.38	0.00	19.17	0.00	44.29	0.00	30.16	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4800 Mansfield	0	0.00	4.73	0.00	8.61	0.00	62.60	0.00	24.06	0.00	0.00	0.00	0.00	0.00	0.00
MSA 8400 Toledo	0	0.00	10.27	0.00	20.13	0.00	50.00	0.00	19.61	0.00	0.00	0.00	0.00	0.00	0.00
MSA 9320 Youngstown	0	0.00	17.04	0.00	10.17	0.00	36.98	0.00	35.80	0.00	0.00	0.00	0.00	0.00	0.00
OH Non-MSA AAs	0	0.00	0.00	0.00	6.80	0.00	61.10	0.00	32.11	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography : OHIO				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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					
<b>Full Review:</b>																				
MSA 1680 Cleveland/Lorain/Elyria	5,474	31.73	7.87	8.66	10.84	11.57	43.35	40.89	37.94	38.88	2.28	2.73	2.78	2.02	2.54					
<b>Limited Review:</b>																				
MSA 0080 Akron	1,712	9.92	5.81	6.89	13.35	13.20	50.85	49.24	29.98	30.67	2.47	2.63	3.44	2.34	2.57					
MSA 1320 Canton	1,189	6.89	6.26	5.05	10.01	9.67	57.57	47.77	26.16	37.51	2.82	2.52	2.85	2.42	4.02					
MSA 1640 Cincinnati	1,765	10.23	7.41	6.07	11.05	6.92	46.79	44.53	34.75	42.48	1.19	1.15	0.79	1.28	1.34					
MSA 1840 Columbus	2,229	12.92	9.70	10.43	15.34	12.83	34.43	34.04	40.54	42.70	2.10	2.53	1.42	2.09	2.45					
MSA 2000 Dayton	1,445	8.38	10.05	11.98	16.32	18.01	43.64	40.72	29.99	29.29	1.78	1.77	1.40	1.92	1.95					
MSA 3200 Hamilton/Middletown	408	2.36	7.61	7.60	14.79	8.33	48.57	47.30	29.03	36.76	1.27	1.59	1.34	0.87	2.00					
MSA 4800 Mansfield	368	2.13	6.35	12.50	15.13	22.55	48.49	33.97	30.03	30.98	2.36	4.68	3.48	1.97	2.26					
MSA 8400 Toledo	1,724	9.99	9.05	10.03	11.53	12.65	51.87	46.35	27.55	30.97	2.86	3.82	3.09	2.51	3.52					
MSA 9320 Youngstown	602	3.49	8.95	4.49	12.08	6.15	50.74	53.99	28.23	35.38	1.33	1.10	0.33	1.32	1.83					
OH Non-MSA AAs	546	3.16	0.00	0.00	4.01	5.86	66.38	56.78	29.60	37.36	0.90	0.00	1.76	0.92	0.91					

\* Based on 2001 Peer Small Business Data - US

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS															
Geography : OHIO															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
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
<b>Full Review:</b>															
MSA 1680 Cleveland/Lorain/Elyria	57	44.19	1.69	1.75	7.96	31.58	51.75	63.16	38.60	3.51	19.23	0.00	42.86	20.69	6.67
<b>Limited Review:</b>															
MSA 0080 Akron	8	6.20	2.44	0.00	3.77	0.00	63.34	87.50	30.45	12.50	5.26	0.00	0.00	7.14	0.00
MSA 1320 Canton	1	0.78	1.64	0.00	1.86	0.00	83.79	100.00	12.71	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1640 Cincinnati	1	0.78	2.19	0.00	9.84	0.00	57.69	100.00	30.29	0.00	0.00	0.00	0.00	0.00	0.00
MSA 1840 Columbus	0	0.00	3.72	0.00	11.16	0.00	38.09	0.00	47.04	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2000 Dayton	44	34.11	1.36	0.00	9.69	4.55	67.21	56.82	21.75	38.64	0.37	0.00	0.00	0.51	0.00
MSA 3200 Hamilton/Middletown	0	0.00	1.98	0.00	6.53	0.00	69.11	0.00	22.38	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4800 Mansfield	2	1.55	0.25	0.00	3.23	0.00	55.58	50.00	40.94	50.00	0.00	0.00	0.00	0.00	0.00
MSA 8400 Toledo	2	1.55	0.85	0.00	3.69	0.00	81.84	0.00	13.62	100.00	0.00	0.00	0.00	0.00	0.00
MSA 9320 Youngstown	3	2.33	1.08	0.00	3.85	0.00	78.85	100.00	16.23	0.00	1.56	0.00	0.00	0.00	9.09
OH Non-MSA AAs	11	8.53	0.00	0.00	1.34	0.00	71.59	63.64	27.06	36.36	0.14	0.00	0.00	0.18	0.00

\* Based on 2001 Peer Small Business Data - US

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

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

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

Borrower Distribution: HOME PURCHASE		Geography : OHIO						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1680 Cleveland/Lorain/Elyria	1,740	41.52	20.02	25.17	17.12	31.57	23.75	16.94	39.10	26.32	0.91	2.16	1.17	0.56	0.67
<b>Limited Review:</b>															
MSA 0080 Akron	278	6.63	19.15	15.48	18.39	27.78	23.87	13.49	38.59	43.25	0.38	0.69	0.39	0.23	0.41
MSA 1320 Canton	169	4.03	18.08	18.45	18.26	25.60	25.33	21.43	38.33	34.52	0.51	0.98	0.68	0.44	0.32
MSA 1640 Cincinnati	280	6.68	20.00	12.90	16.85	36.20	22.97	25.09	40.18	25.81	0.18	0.25	0.18	0.21	0.13
MSA 1840 Columbus	393	9.38	19.17	22.39	17.51	38.68	24.15	18.07	39.17	20.87	0.33	0.59	0.55	0.18	0.19
MSA 2000 Dayton	406	9.69	19.90	29.14	17.75	34.07	24.15	13.33	38.20	23.46	0.59	1.35	0.48	0.38	0.57
MSA 3200 Hamilton/Middletown	58	1.38	19.23	24.14	18.20	24.14	24.52	25.86	38.06	25.86	0.28	0.39	0.16	0.44	0.20
MSA 4800 Mansfield	21	0.50	17.79	19.05	17.83	23.81	24.33	23.81	40.05	33.33	0.22	0.00	0.65	0.18	0.00
MSA 8400 Toledo	578	13.79	20.78	23.53	17.28	29.58	23.50	22.15	38.44	24.74	0.95	1.72	1.12	0.67	0.84
MSA 9320 Youngstown	83	1.98	21.64	18.29	19.12	25.61	22.75	20.73	36.48	35.37	0.19	0.19	0.16	0.33	0.10
OH Non-MSA AAs	185	4.41	13.89	10.33	16.50	27.17	24.02	32.07	45.59	30.43	0.62	0.66	0.77	0.76	0.43

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by BANK.

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

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the 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: OHIO					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
MSA 1680 Cleveland/Lorain/Elyria	3,623	44.16	20.02	18.97	17.12	26.72	23.75	27.14	39.10	27.17	11.66	13.65	12.18	11.38	10.42	
<b>Limited Review:</b>																
MSA 0080 Akron	677	8.25	19.15	17.19	18.39	30.81	23.87	28.00	38.59	24.00	6.38	8.06	8.60	5.36	4.84	
MSA 1320 Canton	560	6.83	18.08	14.21	18.26	22.04	25.33	32.60	38.33	31.15	11.48	10.76	10.81	11.47	12.32	
MSA 1640 Cincinnati	339	4.13	20.00	12.17	16.85	22.26	22.97	26.41	40.18	39.17	1.13	0.72	0.81	1.61	1.12	
MSA 1840 Columbus	392	4.78	19.17	6.91	17.51	25.06	24.15	28.39	39.17	39.64	2.76	1.19	2.86	1.97	3.95	
MSA 2000 Dayton	797	9.71	19.90	19.77	17.75	26.07	24.15	28.34	38.20	25.82	5.72	5.85	6.98	5.83	4.55	
MSA 3200 Hamilton/Middletown	120	1.46	19.23	13.45	18.20	35.29	24.52	28.57	38.06	22.69	2.12	1.99	2.92	1.64	2.06	
MSA 4800 Mansfield	114	1.39	17.79	8.77	17.83	28.95	24.33	30.70	40.05	31.58	6.33	1.79	9.41	5.88	6.67	
MSA 8400 Toledo	734	8.95	20.78	17.81	17.28	24.38	23.50	30.00	38.44	27.81	8.58	11.54	7.78	7.93	8.42	
MSA 9320 Youngstown	470	5.73	21.64	12.61	19.12	28.85	22.75	28.21	36.48	30.34	5.71	7.19	7.66	5.31	4.40	
OH Non-MSA AAs	379	4.62	13.89	7.65	16.50	22.43	24.02	30.34	45.59	39.58	8.27	5.10	11.11	9.12	6.92	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.6% 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: OHIO										Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 1680 Cleveland/Lorain/Elyria	1,371	38.60	20.02	13.06	17.12	20.54	23.75	19.59	39.10	46.81	0.64	0.68	0.58	0.39	0.84	
<b>Limited Review:</b>																
MSA 0080 Akron	387	10.90	19.15	9.68	18.39	25.22	23.87	19.35	38.59	45.75	0.36	0.17	0.38	0.28	0.45	
MSA 1320 Canton	236	6.64	18.08	9.32	18.26	15.25	25.33	21.61	38.33	53.81	0.54	0.55	0.42	0.41	0.73	
MSA 1640 Cincinnati	239	6.73	20.00	9.66	16.85	19.33	22.97	18.49	40.18	52.52	0.15	0.15	0.20	0.12	0.14	
MSA 1840 Columbus	153	4.31	19.17	11.92	17.51	26.49	24.15	25.83	39.17	35.76	0.17	0.31	0.16	0.21	0.12	
MSA 2000 Dayton	344	9.68	19.90	13.08	17.75	21.80	24.15	23.84	38.20	41.28	0.41	0.44	0.33	0.45	0.43	
MSA 3200 Hamilton/Middletown	41	1.15	19.23	7.32	18.20	34.15	24.52	26.83	38.06	31.71	0.08	0.00	0.14	0.07	0.07	
MSA 4800 Mansfield	41	1.15	17.79	7.32	17.83	21.95	24.33	26.83	40.05	43.90	0.36	0.36	0.26	0.46	0.34	
MSA 8400 Toledo	453	12.75	20.78	8.41	17.28	15.71	23.50	23.45	38.44	52.43	0.55	0.30	0.41	0.44	0.74	
MSA 9320 Youngstown	123	3.46	21.64	5.69	19.12	13.82	22.75	20.33	36.48	60.16	0.34	0.13	0.10	0.20	0.57	
OH Non-MSA AAs	164	4.62	13.89	8.54	16.50	17.68	24.02	28.66	45.59	45.12	0.34	0.14	0.32	0.28	0.41	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by BANK.

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography : OHIO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
MA/Assessment Area:	#	% 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
<b>Full Review:</b>									
MSA 1680 Cleveland/Lorain/Elyria	5,474	31.35	76.83	69.04	73.80	11.80	14.40	2.28	3.42
<b>Limited Review:</b>									
MSA 0080 Akron	1,712	9.80	77.77	63.55	72.49	12.62	14.89	2.47	3.24
MSA 1320 Canton	1,189	6.81	78.41	64.42	74.10	13.20	12.70	2.82	4.58
MSA 1640 Cincinnati	1,765	10.11	78.55	73.14	74.73	13.20	12.07	1.19	1.95
MSA 1840 Columbus	2,229	12.76	77.10	67.34	77.21	11.62	11.17	2.10	3.17
MSA 2000 Dayton	1,445	8.28	80.44	71.14	70.87	13.84	15.29	1.78	2.93
MSA 3200 Hamilton/Middletown	408	2.34	77.82	72.55	72.06	15.69	12.25	1.27	1.90
MSA 4800 Mansfield	368	2.11	80.30	68.21	77.72	10.60	11.68	2.36	2.17
MSA 8400 Toledo	1,724	9.87	77.58	70.36	77.20	11.77	11.02	2.86	3.67
MSA 9320 Youngstown	602	3.45	78.71	60.96	66.61	14.29	19.10	1.33	2.13
OH Non-MSA AAs	546	3.13	79.90	70.51	79.85	10.99	9.16	0.90	1.09

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.37% 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 : OHIO			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1680 Cleveland/Lorain/Elyria	57	44.19	92.32	98.25	64.91	31.58	3.51	19.23	25.71
<b>Limited Review:</b>									
MSA 0080 Akron	8	6.20	91.85	100.00	87.50	0.00	12.50	5.26	7.14
MSA 1320 Canton	1	0.78	95.40	100.00	100.00	0.00	0.00	0.00	0.00
MSA 1640 Cincinnati	1	0.78	91.11	100.00	100.00	0.00	0.00	0.00	0.00
MSA 1840 Columbus	0	0.00	90.48	0.00	0.00	0.00	0.00	0.00	0.00
MSA 2000 Dayton	44	34.11	95.46	100.00	75.00	18.18	6.82	0.37	0.39
MSA 3200 Hamilton/Middletown	0	0.00	95.84	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4800 Mansfield	2	1.55	96.28	100.00	100.00	0.00	0.00	0.00	0.00
MSA 8400 Toledo	2	1.55	95.39	100.00	50.00	0.00	50.00	0.00	0.00
MSA 9320 Youngstown	3	2.33	94.95	33.33	0.00	33.33	66.67	1.56	1.92
OH Non-MSA AAs	11	8.53	96.13	81.82	72.73	18.18	9.09	0.14	0.00

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

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



Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 1680 Cleveland/Lorain/Elyria	42	132,979	475	26,409	517	159,388	70.67	0	0
<b>Limited Review:</b>									
MSA 0080 Akron	2	1,101	66	189	68	1,290	0.57	0	0
MSA 1320 Canton	1	50	44	240	45	290	0.13	0	0
MSA 1640 Cincinnati	11	902	75	3,383	86	4,285	1.90	0	0
MSA 1840 Columbus	9	1,753	59	561	68	2,314	1.03	0	0
MSA 2000 Dayton	7	1,769	51	5,322	58	7,091	3.14	0	0
MSA 3200 Hamilton/Middletown	0	0	7	15	7	15	0.01	0	0
MSA 4800 Mansfield	0	0	9	61	9	61	0.03	0	0
MSA 8400 Toledo	4	1,486	77	2,315	81	3,801	1.69	0	0
MSA 9320 Youngstown	2	1,366	18	1,735	20	3,101	1.38	0	0
OH Non-MSA AAs	4	1,516	43	1,389	47	2,905	1.29	0	0
Statewide/Regional	5	4,310	12	36,674	17	40,984	18.16	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: OHIO				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003							
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		
<b>Full Review:</b>																			
MSA 1680 Cleveland/Lorain/Elyria	72.61	72	32.00	11.11	8.33	50.00	30.56	2	11	- 3	- 3	- 2	- 1	10.75	14.94	45.56	28.67		
<b>Limited Review:</b>																			
MSA 0080 Akron	3.05	20	8.89	0.00	30.00	35.00	35.00	3	0	0	1	1	1	5.71	16.78	56.72	20.80		
MSA 1320 Canton	3.16	13	5.78	7.69	0.00	61.54	30.77	0	0	0	0	0	0	3.67	14.83	60.69	20.80		
MSA 1640 Cincinnati	2.83	22	9.78	0.00	4.55	59.09	36.36	2	2	0	- 1	0	1	8.52	15.02	46.40	29.79		
MSA 1840 Columbus	3.57	18	8.00	0.00	5.56	55.56	38.89	0	1	0	0	- 1	0	12.46	21.69	35.27	30.54		
MSA 2000 Dayton	4.63	24	10.67	4.17	12.50	54.17	29.17	0	1	0	- 1	0	0	7.87	18.91	49.74	23.48		
MSA 3200 Hamilton/Middletown	0.58	3	1.33	33.33	0.00	66.67	0.00	0	1	0	0	- 1	0	7.65	19.99	45.26	26.40		
MSA 4800 Mansfield	1.04	6	2.67	16.67	16.67	33.33	33.33	0	0	0	0	0	0	2.30	13.90	50.74	33.07		
MSA 8400 Toledo	5.17	26	11.56	7.69	15.38	42.31	34.62	0	1	- 1	0	0	0	6.58	18.40	52.77	20.97		
MSA 9320 Youngstown	0.77	7	3.11	14.29	0.00	57.14	28.57	0	0	0	0	0	0	7.80	17.18	54.69	20.34		
OH Non-MSA AAs	2.59	14	6.22	0.00	14.29	50.00	35.71	1	2	0	0	- 1	0	0.00	3.92	66.01	30.07		

**Table 1. Lending Volume**

LENDING VOLUME		Geography: OREGON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 2400 Eugene/Springfield	26.42	341	18,430	780	65,454	63	9,736	3	9,340	1,187	102,960	25.28
<b>Limited Review:</b>												
MSA 4890 Medford	12.68	210	13,436	360	19,853	0	0	0	0	570	33,289	20.30
MSA 7080 Salem	37.37	468	27,496	825	67,372	385	63,989	1	1,000	1,679	159,857	24.34
Oregon Non-MSA AAs	23.53	327	14,025	568	46,516	162	22,176	0	0	1,057	82,717	30.08
Statewide/Regional								1	1,300	1	1,300	

\* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
 \*\*\* Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: OREGON								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	105	26.79	0.61	0.00	13.67	18.10	66.21	76.19	19.51	5.71	0.35	0.00	0.10	0.47	0.13
<b>Limited Review:</b>															
MSA 4890 Medford	78	19.90	0.38	0.00	10.10	15.38	68.70	65.38	20.81	19.23	0.17	0.00	0.44	0.15	0.10
MSA 7080 Salem	180	45.92	0.00	0.00	7.01	6.67	71.15	71.67	21.84	21.67	0.48	0.00	0.68	0.49	0.42
Oregon Non-MSA AAs	29	7.40	0.00	0.00	9.20	13.79	81.54	75.86	9.26	10.34	0.23	0.00	0.38	0.22	0.22

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography : OREGON								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	148	25.39	0.61	0.68	13.67	9.46	66.21	69.59	19.51	20.27	2.64	0.00	2.56	2.47	3.31
<b>Limited Review:</b>															
MSA 4890 Medford	62	10.63	0.38	0.00	10.10	11.29	68.70	79.03	20.81	9.68	2.20	0.00	3.85	1.58	3.57
MSA 7080 Salem	204	34.99	0.00	0.00	7.01	7.35	71.15	75.00	21.84	17.65	2.08	0.00	2.70	2.53	0.84
Oregon Non-MSA AAs	169	28.99	0.00	0.00	9.20	2.96	81.54	83.43	9.26	13.61	6.10	0.00	0.00	6.79	3.23

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OREGON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ... Units	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 2400 Eugene/Springfield	88	23.72	0.61	0.00	13.67	11.36	66.21	71.59	19.51	17.05	0.17	0.00	0.14	0.21	0.08	
<b>Limited Review:</b>																
MSA 4890 Medford	70	18.87	0.38	1.43	10.10	8.57	68.70	62.86	20.81	27.14	0.31	0.00	0.28	0.31	0.33	
MSA 7080 Salem	84	22.64	0.00	0.00	7.01	7.14	71.15	61.90	21.84	30.95	0.28	0.00	0.64	0.23	0.35	
Oregon Non-MSA AAs	129	34.77	0.00	0.00	9.20	1.55	81.54	91.47	9.26	6.98	0.65	0.00	0.43	0.64	0.82	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: OR EGON					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total	% of MF Units <sup>**</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	0	0.00	17.69	0.00	30.97	0.00	36.70	0.00	14.64	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MSA 4890 Medford	0	0.00	5.30	0.00	11.57	0.00	50.36	0.00	32.77	0.00	0.00	0.00	0.00	0.00	0.00
MSA 7080 Salem	0	0.00	0.00	0.00	23.54	0.00	61.11	0.00	15.35	0.00	0.00	0.00	0.00	0.00	0.00
Oregon Non-MSA AAs	0	0.00	0.00	0.00	7.54	0.00	85.94	0.00	6.53	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography : OREGON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
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	
<b>Full Review:</b>																
MSA 2400 Eugene/Springfield	780	30.79	5.18	8.59	23.25	17.56	54.09	56.03	17.49	17.82	1.75	3.82	1.55	1.90	1.69	
<b>Limited Review:</b>																
MSA 4890 Medford	360	14.21	7.67	4.72	12.09	12.50	64.62	67.50	15.61	15.28	1.26	1.34	1.63	1.47	0.63	
MSA 7080 Salem	825	32.57	0.00	0.00	15.75	20.00	68.86	56.61	15.39	23.39	2.23	0.00	2.68	2.03	3.53	
Oregon Non-MSA AAs	568	22.42	0.00	0.00	10.91	5.11	81.25	85.21	7.84	9.68	2.43	0.00	2.17	2.67	2.73	

\* Based on 2001 Peer Small Business Data - US

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

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



**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography : OREGON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	63	10.33	0.69	0.00	12.46	1.59	74.86	90.48	12.00	7.94	22.00	0.00	0.00	24.39	33.33
<b>Limited Review:</b>															
MSA 4890 Medford	0	0.00	2.15	0.00	8.05	0.00	72.99	0.00	16.82	0.00	0.00	0.00	0.00	0.00	0.00
MSA 7080 Salem	385	63.11	0.00	0.00	3.92	0.00	82.45	88.05	13.64	11.95	23.62	0.00	0.00	23.74	23.53
Oregon Non-MSA AAs	162	26.56	0.00	0.00	7.63	0.00	82.86	80.86	9.51	19.14	16.67	0.00	0.00	15.04	30.00

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : OREGON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase 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
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	105	26.79	19.15	10.48	18.55	32.38	24.03	24.76	38.27	32.38	0.42	0.44	0.55	0.30	0.45
<b>Limited Review:</b>															
MSA 4890 Medford	78	19.90	19.73	12.82	18.12	33.33	23.82	30.77	38.33	23.08	0.20	0.00	0.57	0.19	0.13
MSA 7080 Salem	180	45.92	17.83	7.22	19.49	42.78	24.43	37.78	38.25	12.22	0.55	2.66	1.42	0.41	0.14
Oregon Non-MSA AAs	29	7.40	20.60	6.90	18.64	17.24	23.13	34.48	37.63	41.38	0.27	0.00	0.48	0.30	0.22

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% 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 : OREGON					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	148	25.39	19.15	5.41	18.55	10.81	24.03	25.68	38.27	58.11	2.75	3.33	3.23	0.00	3.92
<b>Limited Review:</b>															
MSA 4890 Medford	62	10.63	19.73	4.84	18.12	20.97	23.82	22.58	38.33	51.61	2.27	7.69	2.27	1.37	2.25
MSA 7080 Salem	204	34.99	17.83	5.88	19.49	15.69	24.43	27.45	38.25	50.98	2.12	0.00	0.87	3.14	2.13
Oregon Non-MSA AAs	169	28.99	20.60	5.92	18.64	18.34	23.13	21.89	37.63	53.85	6.37	11.11	10.42	6.56	5.10

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OREGON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 2400 Eugene/Springfield	88	23.72	19.15	4.60	18.55	16.09	24.03	29.89	38.27	49.43	0.21	0.29	0.36	0.22	0.17
<b>Limited Review:</b>															
MSA 4890 Medford	70	18.87	19.73	10.00	18.12	21.43	23.82	12.86	38.33	55.71	0.38	0.50	0.63	0.44	0.30
MSA 7080 Salem	84	22.64	17.83	2.38	19.49	23.81	24.43	22.62	38.25	51.19	0.34	0.30	0.70	0.23	0.30
Oregon Non-MSA AAs	129	34.77	20.60	3.88	18.64	12.40	23.13	31.78	37.63	51.94	0.79	0.63	0.89	0.88	0.74

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by BANK.

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

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OREGON			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 2400 Eugene/Springfield	780	30.79	65.09	78.59	80.77	10.90	8.33	1.75	3.35
<b>Limited Review:</b>									
MSA 4890 Medford	360	14.21	66.72	85.28	88.06	8.06	3.89	1.26	2.58
MSA 7080 Salem	825	32.57	64.84	76.73	80.97	11.39	7.64	2.23	5.10
Oregon Non-MSA AAs	568	22.42	67.99	76.76	80.46	9.33	10.21	2.43	4.38

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.63% 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 : OREGON			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 2400 Eugene/Springfield	63	10.33	87.89	84.13	55.56	22.22	22.22	22.00	27.78
<b>Limited Review:</b>									
MSA 4890 Medford	0	0.00	89.62	0.00	0.00	0.00	0.00	0.00	0.00
MSA 7080 Salem	385	63.11	85.17	74.55	47.01	25.71	27.27	23.62	23.36
Oregon Non-MSA AAs	162	26.56	86.82	82.72	50.62	36.42	12.96	16.67	16.79

\* Based on 2001 Peer Small Business Data -- US

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

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: OREGON				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 2400 Eugene/Springfield	4	832	14	2,458	18	3,290	53.50	0	0
<b>Limited Review:</b>									
MSA 4890 Medford	0	0	4	9	4	9	0.15	0	0
MSA 7080 Salem	2	122	11	1,382	13	1,504	24.44	0	0
Oregon Non-MSA AAs	2	579	3	36	5	615	10.02	0	0
Statewide/Regional	1	731	0	0	1	731	11.89	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: OREGON				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 2400 Eugene/Springfield	25.28	8	27.59	0.00	25.00	62.50	12.50	0	0	0	0	0	0	3.35	17.44	62.34	16.88
<b>Limited Review:</b>																	
MSA 4890 Medford	20.30	5	17.24	20.00	20.00	20.00	40.00	0	0	0	0	0	0	1.30	12.49	66.95	19.26
MSA 7080 Salem	24.34	8	27.59	0.00	12.50	75	12.50	0	0	0	0	0	0	0.00	10.05	70.37	19.58
Oregon Non-MSA AAs	30.08	8	27.59	0.00	12.50	87.50	0.00	0	0	0	0	0	0	0.00	9.18	82.17	8.64



## Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: UTAH						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 7160 Salt Lake/Ogden	73.85	914	72,838	2,389	304,816	8	1,933	16	25,596	3,327	405,183	72.14
<b>Limited Review:</b>												
MSA 6520 Provo/Orem	9.72	93	14,405	337	53,848	4	90	4	13,034	438	81,377	5.65
UT Non-MSA AAs	16.43	229	13,153	339	30,648	164	12,082	8	9,316	740	65,199	22.21
Statewide/Regional								6	7,765	6	7,765	

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

<sup>\*\*</sup> The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: UTAH								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	362	81.72	0.82	3.31	14.89	35.64	59.15	46.41	25.14	14.64	0.18	0.00	0.45	0.13	0.17
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	18	4.06	1.43	0.00	5.67	0.00	58.59	66.67	34.31	33.33	0.01	0.00	0.00	0.02	0.00
UT Non-MSA AAs	63	14.22	0.00	0.00	5.99	1.59	59.91	58.73	34.10	39.68	0.29	0.00	0.00	0.36	0.25

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography : UTAH								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	399	70.12	0.82	1.25	14.89	19.55	59.15	59.65	25.14	19.55	3.21	3.45	5.19	3.23	2.22
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	51	8.96	1.43	0.00	5.67	11.76	58.59	54.90	34.31	33.33	1.69	0.00	0.00	1.82	1.65
UT Non-MSA AAs	119	20.91	0.00	0.00	5.99	2.52	59.91	66.39	34.10	31.09	4.65	0.00	0.00	5.66	4.05

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: UTAH								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	153	68.61	0.82	3.27	14.89	9.80	59.15	49.67	25.14	37.25	0.05	0.00	0.01	0.04	0.08
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	23	10.31	1.43	0.00	5.67	4.35	58.59	47.83	34.31	47.83	0.05	0.00	0.13	0.04	0.05
UT Non-MSA AAs	47	21.08	0.00	0.00	5.99	2.13	59.91	68.09	34.10	29.79	0.07	0.00	0.00	0.11	0.04

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: UTAH						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	0	0.00	5.81	0.00	42.28	0.00	46.21	0.00	5.70	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	1	100.00	43.21	0.00	19.48	100.00	33.72	0.00	3.60	0.00	0.00	0.00	0.00	0.00	0.00
UT Non-MSA AAs	0	0.00	0.00	0.00	13.50	0.00	48.27	0.00	38.23	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography : UTAH				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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					
<b>Full Review:</b>																				
MSA 7160 Salt Lake/Ogden	2,389	77.94	4.80	7.28	21.05	27.63	48.43	45.84	25.73	19.25	1.92	2.14	2.03	2.06	1.66					
<b>Limited Review:</b>																				
MSA 6520 Provo/Orem	337	11.00	4.28	3.86	9.40	8.90	56.22	64.39	30.10	22.85	0.97	1.96	1.33	0.97	0.90					
UT Non-MSA AAs	339	11.06	0.00	0.00	9.31	10.03	44.50	59.88	46.20	30.09	1.65	0.00	2.37	2.31	1.20					

\* Based on 2001 Peer Small Business Data - US

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography : UTAH								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	8	4.55	2.43	25.00	14.16	0.00	60.69	62.50	22.72	12.50	1.23	0.00	0.00	1.59	0.00
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	4	2.27	1.82	100.00	4.64	0.00	69.32	0.00	24.21	0.00	0.96	100.00	0.00	0.00	0.00
UT Non-MSA AAs	164	93.18	0.00	0.00	2.37	0.00	70.34	81.10	27.28	18.90	11.90	0.00	0.00	11.47	15.56

\* Based on 2001 Peer Small Business Data - US

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

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

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

Borrower Distribution: HOME PURCHASE		Geography : UTAH								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7160 Salt Lake/Ogden	362	81.72	16.64	7.52	19.61	40.67	26.60	28.41	37.16	23.40	0.22	0.17	0.34	0.15	0.19
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	18	4.06	19.19	0.00	18.38	11.11	24.30	33.33	38.14	55.56	0.01	0.00	0.06	0.00	0.00
UT Non-MSA AAs	63	14.22	14.79	3.17	16.06	19.05	23.57	58.73	45.58	19.05	0.35	0.00	0.48	0.77	0.08

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by BANK.

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

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the 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 : UTAH					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share *				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total	% Families ***	% BANK Loans ****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 7160 Salt Lake/Ogden	399	70.12	16.64	5.76	19.61	19.80	26.60	28.82	37.16	45.61	3.33	3.86	2.43	2.85	4.09	
<b>Limited Review:</b>																
MSA 6520 Provo/Orem	51	8.96	19.19	4.00	18.38	4.00	24.30	32.00	38.14	60.00	1.75	0.00	0.00	1.14	2.43	
UT Non-MSA AAs	119	20.91	14.79	10.92	16.06	18.49	23.57	26.05	45.58	44.54	4.83	0.00	9.26	1.92	5.41	

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.2% 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: UTAH					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
<b>Full Review :</b>															
MSA 7160 Salt Lake/Ogden	153	68.61	16.64	4.61	19.61	15.79	26.60	22.37	37.16	57.24	0.07	0.00	0.04	0.06	0.09
<b>Limited Review:</b>															
MSA 6520 Provo/Orem	23	10.31	19.19	4.35	18.38	0.00	24.30	26.09	38.14	69.57	0.06	0.00	0.00	0.07	0.07
UT Non-MSA AAs	47	21.08	14.79	2.13	16.06	19.15	23.57	29.79	45.58	48.94	0.09	0.63	0.21	0.13	0.04

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by BANK.

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

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography : UTAH			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 7160 Salt Lake/Ogden	2,389	77.94	52.78	66.22	71.12	13.39	15.49	1.92	3.08
<b>Limited Review:</b>									
MSA 6520 Provo/Orem	337	11.00	51.59	67.36	66.77	13.06	20.18	0.97	1.33
UT Non-MSA AAs	339	11.06	59.23	78.47	82.01	9.73	8.26	1.65	2.75

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.26% 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 : UTAH			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$ 1Million or Less
<b>Full Review:</b>									
MSA 7160 Salt Lake/Ogden	8	4.55	91.56	50.00	37.50	0.00	62.50	1.23	0.00
<b>Limited Review:</b>									
MSA 6520 Provo/Orem	4	2.27	89.88	100.00	100.00	0.00	0.00	0.96	1.12
UT Non-MSA AAs	164	93.18	95.02	100.00	76.83	18.90	4.27	11.90	12.96

\* Based on 2001 Peer Small Business Data -- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: UTAH				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 7160 Salt Lake/Ogden	2	80	87	7,895	89	7,975	59.34	0	0
<b>Limited Review:</b>									
MSA 6520 Provo/Orem	0	0	4	10	4	10	0.07	0	0
UT Non-MSA AAs	4	708	6	4,748	10	5,456	40.59	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: UTAH				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 7160 Salt Lake/Ogden	72.14	24	64.86	4.17	16.67	62.50	16.67	5	1	0	- 1	4	1	1.80	18.21	57.37	22.62
<b>Limited Review:</b>																	
MSA 6520 Provo/Orem	5.65	3	8.11	0.00	33.33	33.33	33.33	1	0	0	0	1	0	10.68	8.13	52.35	28.54
UT Non-MSA AAs	22.21	10	27.03	0.00	20.00	60.00	20.00	1	0	0	0	0	1	0.00	7.46	60.75	31.79

Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: VERMONT						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 1305 Burlington	60.42	448	45,335	542	56,821	0	0	10	10,649	1,000	112,805	69.50
<b>Limited Review:</b>												
VT Non-MSA AAs	39.58	337	18,341	313	36,958	4	702	1	1,650	655	57,651	30.50

\* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.  
 \*\*\* Deposit Data as of June 30, 2002. Rated Area refers to the state, multi-state MA, or institution, as appropriate.

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: VERMONT				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans	% Owner Occ Units ***	% BANK Loans						
<b>Full Review:</b>																
MSA 1305 Burlington	198	65.35	1.85	3.03	9.99	11.11	67.29	68.18	20.88	17.68	1.27	1.69	0.30	1.46	1.05	
<b>Limited Review:</b>																
VT Non-MSA AAs	105	34.65	0.00	0.00	3.25	2.86	80.55	68.57	16.20	28.57	0.37	0.00	0.00	0.30	0.71	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography : VERMONT								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income		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
<b>Full Review:</b>															
MSA 1305 Burlington	145	47.08	1.85	2.07	9.99	15.86	67.29	68.28	20.88	13.79	32.08	0.00	47.06	29.73	30.77
<b>Limited Review:</b>															
VT Non-MSA AAs	163	52.92	0.00	0.00	3.25	3.68	80.55	80.37	16.20	15.95	20.99	0.00	0.00	24.17	19.23

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: VERMONT								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 1305 Burlington	105	60.34	1.85	3.81	9.99	7.62	67.29	63.81	20.88	24.76	0.29	0.00	0.00	0.32	0.32
<b>Limited Review:</b>															
VT Non-MSA AAs	69	39.66	0.00	0.00	3.25	2.90	80.55	71.01	16.20	26.09	0.28	0.00	0.52	0.21	0.51

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: VERMONT								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1305 Burlington	0	0.00	13.53	0.00	20.82	0.00	56.23	0.00	9.42	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
VT Non-MSA AAs	0	0.00	0.00	0.00	1.92	0.00	81.90	0.00	16.18	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography : VERMONT								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 1305 Burlington	542	63.39	11.91	7.56	11.49	7.56	58.11	63.65	18.48	21.22	2.17	2.65	2.10	2.30	2.23
<b>Limited Review:</b>															
VT Non-MSA AAs	313	36.61	0.00	0.00	2.46	2.88	78.43	82.11	19.11	15.02	0.79	0.00	0.63	0.90	0.83

\* Based on 2001 Peer Small Business Data - US

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

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

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography : VERMONT								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
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
<b>Full Review:</b>															
MSA 1305 Burlington	0	0.00	2.20	0.00	12.91	0.00	68.41	0.00	16.48	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
VT Non-MSA AAs	4	100.00	0.00	0.00	2.76	0.00	86.63	100.00	10.61	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data - US

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

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

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

Borrower Distribution: HOME PURCHASE			Geography : VERMONT				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1305 Burlington	198	65.35	16.86	10.61	18.92	39.90	26.98	33.33	37.24	16.16	1.45	2.80	3.60	1.34	0.35
<b>Limited Review:</b>															
VT Non-MSA AAs	105	34.65	16.59	5.71	17.82	32.38	25.57	24.76	40.02	37.14	0.44	0.00	0.54	0.42	0.45

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the 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 : VERMONT						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
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
<b>Full Review:</b>															
MSA 1305 Burlington	145	47.08	16.86	10.34	18.92	26.21	26.98	31.03	37.24	32.41	34.00	37.50	30.30	44.44	28.13
<b>Limited Review:</b>															
VT Non-MSA AAs	163	52.92	16.59	2.45	17.82	22.09	25.57	27.61	40.02	47.85	22.08	0.00	27.59	20.37	24.19

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: VERMONT				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 1305 Burlington	105	60.34	16.86	1.90	18.92	20.00	26.98	28.57	37.24	49.52	0.34	0.00	0.36	0.42	0.31
<b>Limited Review:</b>															
VT Non-MSA AAs	69	39.66	16.59	2.90	17.82	10.14	25.57	17.39	40.02	69.57	0.33	0.76	0.19	0.25	0.37

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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



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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography : VERMONT			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1305 Burlington	542	63.39	69.91	69.00	73.62	15.31	11.07	2.17	3.29
<b>Limited Review:</b>									
VT Non-MSA AAs	313	36.61	72.92	74.76	74.12	12.14	13.74	0.79	1.28

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% 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 : VERMONT			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 1305 Burlington	0	0.00	92.58	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
VT Non-MSA AAs	4	100.00	93.40	50.00	50.00	25.00	25.00	0.00	0.00

\* Based on 2001 Peer Small Business Data-- US

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

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

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

Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: VERMONT				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 1305 Burlington	2	402	16	74	18	476	21.28	0	0
<b>Limited Review:</b>									
VT Non-MSA AAs	1	1,442	13	319	14	1,761	78.72	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: VERMONT				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 1305 Burlington	69.50	10	71.43	10.00	10.00	60.00	20.00	0	2	0	0	- 1	- 1	4.72	12.96	65.08	17.24
<b>Limited Review:</b>																	
VT Non-MSA AAs	30.50	4	28.57	0.00	0.00	50.00	50.00	0	3	0	0	- 3	0	0.00	3.22	81.37	15.41

## Institution ID: KeyBank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: WASHINGTON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 7600 Seattle/Bellevue/Everett	46.52	3,386	337,109	7,516	989,510	32	3,257	38	122,332	10,972	1,452,208	46.15
<b>Limited Review:</b>												
MSA 0860 Bellingham	3.44	155	12,253	602	67,170	54	9,428	1	1,736	812	90,587	4.30
MSA 1150 Bremerton	3.38	425	34,643	367	40,717	2	67	4	14,434	798	89,861	2.50
MSA 5910 Olympia	5.25	471	18,078	766	67,885	1	5	1	400	1,239	86,368	5.68
MSA 6740 Richland/Kennewick	2.68	90	3,867	244	38,250	297	53,549	1	1,100	632	96,766	1.66
MSA 8200 Tacoma	19.93	1,509	81,060	3,173	350,707	14	1,463	6	28,164	4,702	461,394	22.88
MSA 9260 Yakima	3.92	99	2,265	395	66,247	427	68,450	3	7,727	924	144,689	2.52
WA Non-MSA AAs	14.88	978	51,009	1,800	155,548	723	107,357	8	12,318	3,510	326,232	14.31
Statewide/Regional								2	4,020	2	4,020	

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

\*\* The evaluation period for Community Development Loans is from January 01, 1999 to August 31, 2003.

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME PURCHASE			Geography: WASHINGTON								Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
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
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	1,276	65.14	0.58	0.39	11.79	16.30	65.01	62.85	22.62	20.45	0.42	0.42	0.56	0.39	0.39
<b>Limited Review:</b>															
MSA 0860 Bellingham	21	1.07	0.00	0.00	10.62	4.76	77.33	80.95	12.05	14.29	0.14	0.00	0.00	0.16	0.17
MSA 1150 Bremerton	149	7.61	0.05	0.67	11.55	17.45	74.67	67.11	13.73	14.77	0.49	0.00	0.58	0.47	0.58
MSA 5910 Olympia	32	1.63	0.00	0.00	2.41	0.00	88.41	93.75	9.18	6.25	0.13	0.00	0.00	0.15	0.00
MSA 6740 Richland/Kennewick	19	0.97	0.00	0.00	20.77	57.89	48.06	31.58	31.18	10.53	0.04	0.00	0.00	0.04	0.05
MSA 8200 Tacoma	283	14.45	1.42	7.77	9.00	10.60	61.49	49.12	28.09	32.51	0.31	1.56	0.26	0.32	0.26
MSA 9260 Yakima	11	0.56	0.23	0.00	25.47	18.18	41.57	63.64	32.73	18.18	0.07	0.00	0.00	0.00	0.18
WA Non-MSA AAs	168	8.58	0.00	0.00	9.45	31.55	68.37	54.76	22.18	13.69	0.42	0.00	2.57	0.26	0.19

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME IMPROVEMENT			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 7600 Seattle/Bellevue/Everett	1,445	41.10	0.58	1.11	11.79	12.87	65.01	71.21	22.62	14.81	1.73	0.00	3.09	1.72	1.11	
<b>Limited Review:</b>																
MSA 0860 Bellingham	96	2.73	0.00	0.00	10.62	15.63	77.33	73.96	12.05	10.42	3.01	0.00	4.65	3.18	0.00	
MSA 1150 Bremerton	170	4.84	0.05	0.00	11.55	14.71	74.67	77.65	13.73	7.65	1.61	0.00	1.96	1.65	0.97	
MSA 5910 Olympia	307	8.73	0.00	0.00	2.41	2.61	88.41	91.86	9.18	5.54	6.94	0.00	0.00	7.38	3.64	
MSA 6740 Richland/Kennewick	44	1.25	0.00	0.00	20.77	40.91	48.06	36.36	31.18	22.73	0.58	0.00	2.17	0.00	0.78	
MSA 8200 Tacoma	865	24.60	1.42	0.81	9.00	7.75	61.49	66.01	28.09	25.43	5.61	0.00	3.35	6.89	4.12	
MSA 9260 Yakima	68	1.93	0.23	1.47	25.47	27.94	41.57	45.59	32.73	25.00	2.23	0.00	5.71	0.61	1.69	
WA Non-MSA AAs	521	14.82	0.00	0.00	9.45	12.48	68.37	69.48	22.18	18.04	5.98	0.00	7.83	6.46	4.01	

\* Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	659	40.48	0.58	0.30	11.79	10.17	65.01	60.70	22.62	28.83	0.15	0.00	0.12	0.15	0.18
<b>Limited Review:</b>															
MSA 0860 Bellingham	38	2.33	0.00	0.00	10.62	0.00	77.33	60.53	12.05	39.47	0.18	0.00	0.00	0.18	0.37
MSA 1150 Bremerton	106	6.51	0.05	0.94	11.55	9.43	74.67	74.53	13.73	15.09	0.26	25.00	0.54	0.23	0.18
MSA 5910 Olympia	132	8.11	0.00	0.00	2.41	1.52	88.41	92.42	9.18	6.06	0.36	0.00	0.53	0.37	0.21
MSA 6740 Richland/Kennewick	27	1.66	0.00	0.00	20.77	22.22	48.06	51.85	31.18	25.93	0.16	0.00	0.17	0.17	0.14
MSA 8200 Tacoma	358	21.99	1.42	1.12	9.00	6.42	61.49	63.41	28.09	29.05	0.23	0.62	0.22	0.22	0.25
MSA 9260 Yakima	20	1.23	0.23	0.00	25.47	60.00	41.57	25.00	32.73	15.00	0.08	0.00	0.21	0.00	0.11
WA Non-MSA AAs	288	17.69	0.00	0.00	9.45	11.81	68.37	74.65	22.18	13.54	0.40	0.00	0.68	0.46	0.20

\* Based on 2001 Peer Mortgage Data - Whole US

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

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



Institution ID: KeyBank NA

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
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 <sup>**</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
MSA 7600 Seattle/Bellevue/Everett	6	60.00	3.24	16.67	27.88	33.33	56.50	50.00	12.38	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
MSA 0860 Bellingham	0	0.00	0.00	0.00	29.61	0.00	59.52	0.00	10.87	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 1150 Bremerton	0	0.00	3.03	0.00	34.58	0.00	61.62	0.00	0.78	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5910 Olympia	0	0.00	0.00	0.00	4.69	0.00	81.59	0.00	13.71	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6740 Richland/Kennewick	0	0.00	0.00	0.00	33.35	0.00	42.00	0.00	24.65	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 8200 Tacoma	3	30.00	13.76	66.67	20.44	0.00	53.40	33.33	12.39	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 9260 Yakima	0	0.00	11.06	0.00	36.48	0.00	44.50	0.00	7.96	0.00	0.00	0.00	0.00	0.00	0.00	
WA Non-MSA AAs	1	10.00	0.00	0.00	24.77	100.00	55.97	0.00	19.26	0.00	0.00	0.00	0.00	0.00	0.00	

<sup>\*</sup> Based on 2001 Peer Mortgage Data - Whole US

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

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

Institution ID: KeyBank NA

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WASHINGTON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	7,516	50.57	2.31	2.90	19.81	22.21	56.62	49.76	21.25	25.13	2.23	3.07	2.93	2.02	2.65
<b>Limited Review:</b>															
MSA 0860 Bellingham	602	4.05	0.00	0.00	21.91	31.23	70.82	59.47	7.26	9.30	2.60	0.00	5.02	2.05	2.73
MSA 1150 Bremerton	367	2.47	1.58	2.72	13.78	16.35	70.99	66.76	13.65	14.17	1.32	3.23	0.21	1.52	1.84
MSA 5910 Olympia	766	5.15	0.00	0.00	5.21	6.14	77.80	83.29	16.98	10.57	3.15	0.00	2.76	3.70	1.76
MSA 6740 Richland/Kennewick	244	1.64	0.00	0.00	25.57	36.89	48.82	40.98	25.61	22.13	1.66	0.00	3.02	1.64	0.91
MSA 8200 Tacoma	3,173	21.35	7.51	10.31	12.81	13.61	54.10	50.96	25.58	25.12	4.31	6.03	3.58	4.34	4.98
MSA 9260 Yakima	395	2.66	8.34	9.62	26.87	22.78	39.74	43.04	25.04	24.56	1.91	2.58	1.56	2.54	1.59
WA Non-MSA AAs	1,800	12.11	0.00	0.00	13.54	14.50	67.94	66.50	18.52	19.00	2.27	0.00	3.66	2.30	2.28

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography : WASHINGTON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 7600 Seattle/Bellevue/Everett	32	2.06	1.02	0.00	13.97	3.13	66.17	90.63	18.84	6.25	1.45	0.00	0.00	2.05	0.00	
<b>Limited Review:</b>																
MSA 0860 Bellingham	54	3.48	0.00	0.00	5.92	0.00	90.48	98.15	3.60	1.85	0.94	0.00	0.00	0.99	0.00	
MSA 1150 Bremerton	2	0.13	0.00	0.00	6.41	0.00	75.74	100.00	17.85	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 5910 Olympia	1	0.06	0.00	0.00	1.52	0.00	91.77	100.00	6.71	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 6740 Richland/Kennewick	297	19.16	0.00	0.00	25.68	41.75	60.06	54.21	14.26	4.04	27.45	0.00	31.52	28.36	9.09	
MSA 8200 Tacoma	14	0.90	2.88	7.14	8.15	0.00	64.28	64.29	24.69	28.57	5.45	0.00	0.00	7.69	0.00	
MSA 9260 Yakima	427	27.55	0.78	0.70	15.92	10.77	65.95	79.16	17.35	9.37	25.71	0.00	17.14	31.08	9.43	
WA Non-MSA AAs	723	46.65	0.00	0.00	12.35	22.68	74.81	75.24	12.84	2.07	13.17	0.00	18.13	14.48	0.77	

\* Based on 2001 Peer Small Business Data - US

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME PURCHASE		Geography : WASHINGTON						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	1,276	65.14	16.70	18.75	18.94	29.80	26.92	22.20	37.44	29.25	0.47	1.21	0.52	0.37	0.39
<b>Limited Review:</b>															
MSA 0860 Bellingham	21	1.07	17.66	4.76	19.22	9.52	25.22	33.33	37.90	52.38	0.16	0.00	0.15	0.26	0.12
MSA 1150 Bremerton	149	7.61	16.77	13.19	19.44	40.28	26.42	20.14	37.38	26.39	0.48	1.28	1.17	0.31	0.26
MSA 5910 Olympia	32	1.63	17.19	12.50	19.18	21.88	26.49	21.88	37.14	43.75	0.16	0.61	0.21	0.00	0.23
MSA 6740 Richland/Kennewick	19	0.97	21.30	26.32	16.99	26.32	23.41	21.05	38.30	26.32	0.04	0.00	0.00	0.08	0.04
MSA 8200 Tacoma	283	14.45	19.04	10.60	18.46	24.03	24.87	26.15	37.64	39.22	0.36	0.76	0.47	0.36	0.29
MSA 9260 Yakima	11	0.56	21.63	9.09	17.73	18.18	20.58	27.27	40.07	45.45	0.08	0.00	0.00	0.13	0.09
WA Non-MSA AAs	168	8.58	19.79	19.76	17.72	20.96	22.62	21.56	39.88	37.72	0.48	3.36	1.27	0.40	0.21

<sup>1</sup> Based on 2001 Peer Mortgage Data - Whole US

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by BANK.

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

<sup>\*\*\*\*</sup> Home purchase loans originated and purchased in the 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: WASHINGTON				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
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
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	1,445	41.10	16.70	8.17	18.94	22.21	26.92	33.08	37.44	36.54	1.77	1.62	1.57	1.66	1.99
<b>Limited Review:</b>															
MSA 0860 Bellingham	96	2.73	17.66	9.38	19.22	28.13	25.22	28.13	37.90	34.38	3.17	5.26	6.35	3.19	1.97
MSA 1150 Bremerton	170	4.84	16.77	8.24	19.44	15.88	26.42	27.65	37.38	48.24	1.66	2.33	0.70	1.49	2.00
MSA 5910 Olympia	307	8.73	17.19	6.19	19.18	20.85	26.49	27.69	37.14	45.28	7.21	7.14	5.19	5.68	8.45
MSA 6740 Richland/Kennewick	44	1.25	21.30	15.91	16.99	27.27	23.41	29.55	38.30	27.27	0.60	0.00	0.00	1.16	0.52
MSA 8200 Tacoma	865	24.60	19.04	6.25	18.46	17.71	24.87	29.51	37.64	46.53	5.84	6.06	6.51	6.61	5.23
MSA 9260 Yakima	68	1.93	21.63	7.35	17.73	22.06	20.58	32.35	40.07	38.24	2.27	5.00	1.82	5.22	0.80
WA Non-MSA AAs	521	14.82	19.79	7.87	17.72	17.85	22.62	19.77	39.88	54.51	6.18	9.26	9.22	7.14	5.05

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 7600 Seattle/Bellevue/Everett	659	40.48	16.70	8.08	18.94	21.19	26.92	18.45	37.44	52.29	0.17	0.22	0.18	0.10	0.22
<b>Limited Review:</b>															
MSA 0860 Bellingham	38	2.33	17.66	2.63	19.22	7.89	25.22	10.53	37.90	78.95	0.23	0.00	0.12	0.13	0.34
MSA 1150 Bremerton	106	6.51	16.77	5.71	19.44	28.57	26.42	23.81	37.38	41.90	0.32	0.00	0.64	0.37	0.23
MSA 5910 Olympia	132	8.11	17.19	8.33	19.18	20.45	26.49	30.30	37.14	40.91	0.46	0.45	0.88	0.44	0.35
MSA 6740 Richland/Kennewick	27	1.66	21.30	7.41	16.99	22.22	23.41	18.52	38.30	51.85	0.19	0.00	0.00	0.19	0.25
MSA 8200 Tacoma	358	21.99	19.04	10.06	18.46	21.23	24.87	25.42	37.64	43.30	0.29	0.91	0.46	0.29	0.22
MSA 9260 Yakima	20	1.23	21.63	10.00	17.73	5.00	20.58	40.00	40.07	45.00	0.09	0.00	0.00	0.29	0.04
WA Non-MSA AAs	288	17.69	19.79	8.04	17.72	17.48	22.62	24.13	39.88	50.35	0.48	1.40	0.85	0.45	0.40

\* Based on 2001 Peer Mortgage Data - Whole US

\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by BANK.

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

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

Institution ID: KeyBank NA

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography : WASHINGTON		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 7600 Seattle/Bellevue/Everett	7,516	50.57	72.25	70.33	70.14	14.38	15.47	2.23	3.71
<b>Limited Review:</b>									
MSA 0860 Bellingham	602	4.05	77.01	70.93	73.09	13.95	12.96	2.60	3.77
MSA 1150 Bremerton	367	2.47	80.33	76.84	74.66	12.53	12.81	1.32	2.69
MSA 5910 Olympia	766	5.15	77.77	77.42	81.98	10.05	7.96	3.15	6.25
MSA 6740 Richland/Kennewick	244	1.64	80.83	66.80	62.30	19.26	18.44	1.66	2.70
MSA 8200 Tacoma	3,173	21.35	71.07	79.51	77.31	10.65	12.04	4.31	8.02
MSA 9260 Yakima	395	2.66	77.02	61.01	62.53	14.68	22.78	1.91	3.77
WA Non-MSA AAs	1,800	12.11	79.94	81.44	77.72	14.44	7.83	2.27	4.25

\* Based on 2001 Peer Small Business Data -- US

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.24% of small loans to businesses originated and purchased by the bank.

Institution ID: KeyBank NA

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography : WASHINGTON		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
MSA 7600 Seattle/Bellevue/Everett	32	2.06	90.08	68.75	65.63	21.88	12.50	1.45	1.68
<b>Limited Review:</b>									
MSA 0860 Bellingham	54	3.48	88.42	33.33	38.89	35.19	25.93	0.94	0.00
MSA 1150 Bremerton	2	0.13	94.63	100.00	100.00	0.00	0.00	0.00	0.00
MSA 5910 Olympia	1	0.06	92.68	100.00	100.00	0.00	0.00	0.00	0.00
MSA 6740 Richland/Kennewick	297	19.16	81.03	72.39	41.75	32.32	25.93	27.45	26.09
MSA 8200 Tacoma	14	0.90	89.88	85.71	71.43	21.43	7.14	5.45	9.09
MSA 9260 Yakima	427	27.55	80.96	80.33	48.48	27.87	23.65	25.71	31.84
WA Non-MSA AAs	723	46.65	90.65	86.58	50.90	28.63	20.47	13.17	14.73

\* Based on 2001 Peer Small Business Data -- US

\*\* 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&amp;B - 2002).

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



Institution ID: KeyBank NA

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WASHINGTON				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 7600 Seattle/Bellevue/Everett	30	13,647	245	10,558	275	24,205	60.74	0	0
<b>Limited Review:</b>									
MSA 0860 Bellingham	3	272	28	108	31	380	0.95	0	0
MSA 1150 Bremerton	4	1,159	12	1,580	16	2,739	6.87	0	0
MSA 5910 Olympia	1	149	6	2,348	7	2,497	6.27	0	0
MSA 6740 Richland/Kennewick	1	675	12	28	13	703	1.76	0	0
MSA 8200 Tacoma	5	733	41	410	46	1,143	2.87	0	0
MSA 9260 Yakima	0	0	18	84	18	84	0.21	0	0
WA Non-MSA AAs	5	1,209	42	6,838	47	8,047	20.19	0	0
Statewide/Regional			12	55	12	55	0.14		

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

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

Institution ID: KeyBank NA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: WASHINGTON				Evaluation Period: MARCH 1, 1999 TO AUGUST 31, 2003					
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
<b>Full Review:</b>																	
MSA 7600 Seattle/Bellevue/Everett	46.15	59	42.75	3.39	33.90	49.15	13.56	6	3	0	- 1	1	3	2.19	16.18	62.80	18.75
<b>Limited Review:</b>																	
MSA 0860 Bellingham	4.30	7	5.07	0.00	28.57	57.14	14.29	0	0	0	0	0	0	0.00	17.44	72.63	9.91
MSA 1150 Bremerton	2.50	5	3.62	0.00	20.00	80.00	0.00	0	1	0	0	- 1	0	0.28	18.86	67.71	11.33
MSA 5910 Olympia	5.68	9	6.52	0.00	11.11	77.78	11.11	0	0	0	0	0	0	0.00	2.99	87.50	9.51
MSA 6740 Richland/Kennewick	1.66	3	2.17	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	26.82	46.97	26.20
MSA 8200 Tacoma	22.88	30	21.74	13.33	6.67	50.00	30.00	1	2	0	0	- 1	0	4.66	16.05	56.15	23.10
MSA 9260 Yakima	2.52	5	3.62	20.00	20.00	40.00	20.00	0	0	0	0	0	0	1.33	32.12	41.92	24.63
WA Non-MSA AAs	14.31	20	14.49	0.00	30.00	45.00	25.00	0	0	0	0	0	0	0.00	12.29	67.43	20.27