



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

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Community Reinvestment Act Performance Evaluation

Trustco Bank, N.A.

Charter Number: 22844

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Schenectady, New York 12305

Office of the Comptroller of the Currency

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated "**Satisfactory**"

The following table indicates the performance level of **Trustco Bank, N.A.** with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- Lending levels that reflect an excellent responsiveness by TNB to the credit needs of the AA.
- Good distribution of TNB's loans among geographies and borrowers of different income levels throughout the AA.
- Investments that reflect an adequate responsiveness by TNB to the needs of the AA.
- TNB's service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.
- Good performance in providing community development services.
- Community development lending that had a positive impact on the bank's lending performance.
- Flexible lending activities that had a positive impact on the bank's lending

performance.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

Geography - A census tract or a block numbering area delineated by the U.S. 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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Trustco Bank, National Association, (TNB) is headquartered in Schenectady, New York and is a wholly owned subsidiary of Trustco Bank Corp NY (TBC). TBC is the largest commercial banking enterprise headquartered in the Capital Region of New York State, and had total average assets of \$2.4 billion as of December 31, 1999. TBC's other subsidiaries are ORE Subsidiary Corp. Trustco Realty Corp. and Trustco Savings Bank.

TNB is a full service intrastate bank with 54 branches serving nine counties within the Capital Region of New York State. There are no subsidiaries of the bank. TNB continues to concentrate on traditional deposit and loan banking services with an emphasis on real estate mortgages. As of September 30, 2000, TNB had \$2.35 billion in total assets that included \$1.36 billion in net loans, which equates to 58% of total assets. The bank's loan mix consists of 96% real estate loans (89.7% residential real estate and 10.3% commercial), 1% commercial and industrial loans, 2% loans to individuals and 1% credit card loans. Since December 31, 1998, total assets decreased 2.17% due primarily to a decline in securities holdings. During the same period net loans increased 7.36% with real estate loans increasing 7.61%, commercial loans increased 17.45% while loans to individuals decreased by 23.16%. Tier one leverage capital was \$148.4 million as of September 30, 2000.

TNB's last CRA exam was November 2, 1998, at which time the bank's performance was rated "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covered October 1, 1998 through December 31, 2000 for Home Mortgage Disclosure Act (HMDA) and small business loans. The bank does not make small farm loans. HMDA loans include home purchase, home improvement and refinance loans. The evaluation period for CD loans, investments, and services is November 2, 1998 through February 5, 2001. This represents the time period between the start of the bank's last and current CRA exams. The market share and peer comparisons are based on the information contained in the aggregate HMDA and Small Business/Farm Registers for 1999. The aggregate

HMDA and Small Business/Farm Reports are available for public review. The 2000 information will not be available until midyear 2001.

The peer comparisons in this report include only lenders who were required to file HMDA and Small Business/Farm Reports for 1999. Any lender with significant mortgage loan activity operating in TNB's three AAs would be required to file a HMDA report for 1999. Small business reporting is required only of bank and thrift institutions with assets of \$250 million or more as of December 31 of the prior two calendar years preceding the reporting year, or an affiliate of a holding company with \$1 billion or more in assets for the same time period.

Data Integrity

We performed a data integrity exam of the loan information indicated above. We chose samples with 95% reliability and 5% precision, which resulted in random samples of 60 small business loans and 60 HMDA loans.

There were no HMDA errors identified in the sample. Review of the small business data revealed the need to make some adjustments to the 1999 and 2000 loan data. The bank provided us with corrected data to perform the CRA performance analysis. There were five loans removed from the register that should not have been reported. Additionally, revenue codes were changed for 10 loans. The majority of these changes involved the miscoding of loans as loans to small businesses, when the loans were actually made to large businesses. TNB also corrected the geocoding for six loans that were reported with incorrect geographic information.

Selection of Areas for Full-Scope Review

We completed a full-scope review of the bank's Albany-Schenectady-Troy MSA AA, and limited scope reviews of the bank's Glens Falls MSA AA and Non MSA AA. We chose the Albany-Schenectady-Troy MSA for our full-scope analysis because 86% of the bank's lending was in this AA during the rating period. The AA also comprises 90% of TNB's deposits and 85% of its branches. Please refer to Appendix A later in the report for more information.

Ratings

The bank's overall rating is based primarily on the area that received the full-scope review.

When determining conclusions for the Lending Test, home mortgage products were weighted more than small loans to businesses. Within home mortgage lending, home purchase loans were weighted most heavily, followed by home mortgage refinance loans and then home improvement loans. This weighting is reflective of TNB's volume by loan type over the evaluation period.

Other

We held two community group meetings in the Albany-Schenectady-Troy AA, one in the City of Albany and the other in the City of Schenectady. Representatives from seven community and government organizations attended one of the two meetings. The contacts included several groups involved with affordable housing, one representative of city government, and one involved with micro business lending. The contacts stated that the primary credit need of the area was affordable housing financing. There is also a need for small business financing.

An unmet credit need exists concerning allowing a homebuyer to add the cost of rehabilitating/improving a home to the mortgage financing. This type of financing would enable a lower-income homebuyer to purchase a low cost home and pay for the high repair costs associated with many city properties in lower income areas. Without this type of long term/lower rate financing for home repairs, many lower income people are unable to make this type of home purchase. TNB's new low-cost-unsecured home improvement loan was viewed positively for addressing the needs of borrowers requiring \$5,000 or less. However, many of these home rehabilitation projects require funding in excess of \$5,000, and thus require the ability to secure significantly larger loan amounts with longer repayment terms, such as a normal 25 to 30 year mortgage term.

The contacts confirmed the bank's concern that predatory lenders were actively pursuing loans from lower-income borrowers and from lower-income neighborhoods. These predatory lenders pursue these applicants with aggressive marketing tactics. The borrowers unknowingly accept high cost mortgages with unfavorable terms such as balloon payments. Some of the contacts commented on landlords selling properties to tenants and arranging for a second mortgage from a predatory lender for the tenant. If the borrower defaults on the high cost loan, the landlord is able to regain title to the property and resell the property. A bank/community group forum consisting of groups and lenders in the Capital District has been formed to deal with the issue of predatory lending in the area. A TNB representative is an active participant in the group. One of the community contacts mentioned the need for a high loan to value (LTV) refinance loan product, which would help borrowers to retire their high cost loans. The product would

need to cover LTV's as high as 100% or more. The contacts stressed the need for financial literacy education and counseling to help low-income residents from becoming victims of these lending schemes, and helping them to obtain and maintain traditional mortgage financing.

Several contacts stated that escrowing of taxes and insurance premiums was very important for lower-income borrowers. It was believed that many of these borrowers are unable to manage the tax and insurance obligation without having these items included as part of a monthly mortgage payment.

The need for affordable housing and small business related credit, investments and services was considered in our evaluation of TNB's performance under the Lending, Investment and Service Tests. Refer to the Market Profile in Appendix B of this Evaluation for more information.

Fair Lending Review

An analysis of 1999's Home Mortgage Disclosure Data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed September 1998.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on the full-scope review, the bank's performance in the Albany-Schenectady-Troy MSA AA is good.

Lending Activity

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

Approximately 92% of the loans originated during the evaluation period were home mortgage loans, with small loans to businesses representing the remainder. The bank does not make agricultural loans.

Among home mortgage loan originations, 59% were for home purchase, 34% were home mortgage refinance and 7% were for home improvement.

TNB's lending activity is excellent in the Albany-Schenectady-Troy MSA based on the performance of its primary products, home purchase and home mortgage refinance loans. In the Albany-Schenectady-Troy MSA, TNB ranks second for deposits with a 14.65% share of the market. The bank's market share is slightly lower than the large multi-state bank with the highest market share of deposits. TNB slightly outranks another large multi-state bank that has the same number of branches in the AA as TNB. Based on the 1999 HMDA aggregate data, TNB is the fourth largest originator/purchaser of home purchase loans (6.67%), second largest originator/purchaser of mortgage refinance loans (7.74%), and eighth largest originator of home improvement loans (3.92%).

The bank is only outranked in the home purchase market by large mortgage companies. The second and third place lenders only have 7% market shares, only slightly above TNB's market share. The highest ranked lender has an 11% market share. The next highest ranked bank is seventh. The bank with the larger share of the deposit market is ranked number 21, with a 1% market share. The bank with the third highest market share of deposits is ranked number 39, also with a 1% market share.

TNB is only outranked by one lender for refinance loans. The lender is a multi-state bank whose market share is only slightly higher than TNB's (8%).

TNB is outranked by four banks, two finance companies and a credit union for home improvement loans. Home improvement loans are not one of TNB's primary products.

Based on 1999 CRA aggregate data, TNB ranks eleventh in small loans to businesses with a 2% market share. They are outranked by large banks and small banks. The number one lender is a very large credit card company. Commercial loans are not one of the bank's primary products.

Distribution of Loans by Income Level of the Geography

The geographic distribution of TNB's home mortgage loans and small business loans to businesses reflects good penetration throughout the full scope AA geographies.

Home Mortgage Loans

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

The overall distribution of home mortgage loans is good in the full scope AA.

TNB's home purchase loan geographic distribution is adequate in the full scope AA. TNB's portion of loans made in both low and moderate-income geographies were below the portion of owner occupied housing units in these geographies. TNB's market share for loans made in low and moderate-income geographies was below its overall market share. There are limited opportunities for mortgage loans in these geographies, especially in low-income geographies. Eighty-nine percent of the owner-occupied housing is located in middle or upper income geographies. Only slightly more than 1% or 2,100 owner-occupied housing units are located in low-income geographies. The competition with other lenders is very strong, with 222 lenders competing for loans. As mentioned earlier in this report, predatory lenders are believed to have diminished loan opportunities for traditional lenders. Potential predatory lenders may have originated as many as 20 or more of the 122 loans made in the low-income geographies in 1999.

Home improvement loan geographic distribution is good in the full scope AA. The portion of loans made in low-income geographies is near to the portion of owner occupied housing units that are within those geographies. The portion of loans made in moderate-income geographies was below the portion of owner occupied housing units that are within those geographies. There are also limited opportunities for home improvement loans in these geographies due to the limited number of owner-occupied housing units in low and moderate-income geographies. There is also strong competition among lenders for these loans. TNB's market share in low-income geographies substantially exceeds its overall market share. Its market share in moderate-income geographies substantially meets its overall market share.

Refinance loan geographic distribution is good in the full scope AA. The portion of loans made in low and moderate-income geographies is near to the portion of owner occupied housing units that are within those geographies. The market share

in low-income geographies substantially meets TNB's overall market share. The market share in moderate-income geographies exceeds TNB's overall market share.

Small Loans to Businesses

Refer to Table 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good in the full scope AA. The portion of loans in moderate-income geographies significantly exceeds the portion of businesses that are in those geographies. The portion of loans in low-income geographies is near the portion of businesses that are in those geographies. The market shares for these loans both exceeded TNB's overall market shares for small business loans.

Lending Gap Analysis

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

Inside/Outside Ratio

A substantial majority (97%) of the home mortgage loans, small business loans and CD loans were made within the bank's AAs. By product, ninety-seven percent of the bank's home mortgage loans, 96% of the small loans businesses and 100% of the CD loans were within the bank's AAs. Each of the home mortgage loan products, i.e., home purchase, home improvement and refinance loans had a 97% inside/outside ratio. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of TNB's home mortgage and small business loans to businesses reflects a good dispersion among borrowers of different income levels throughout the full scope AA. In the evaluation of borrower distribution, we gave consideration to the fact that 8.79% of the households in the AA are below the poverty level. It is unlikely that those with incomes below the poverty level would be involved in home mortgage financing. We also recognized that it would be a challenge for low-income borrowers to purchase homes in this AA. A low-income

family had income of less than \$25,650 compared to an average housing cost of \$99,594. This means the average housing cost is nearly four times the income of a low-income family at the high end of the low-income spectrum.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans is good in the full scope AA.

Home purchase borrower distribution is good. The portion of loans made to moderate-income borrowers is near the portion of families defined as such. TNB's portion of loans made to low-income borrowers is below the portion of families defined as such. However, as mentioned earlier, we believe the large percentage of families below the poverty level, and the affordability of housing for low-income families, greatly explains the gap between these numbers. The bank's market share to both low and moderate-income borrowers substantially met its overall market share.

Home improvement loan borrower distribution is good. The portion of loans made to moderate-income borrowers significantly exceeds the portion of the families defined as such. The portion of loans made to low-income borrowers is below the portion of the families defined as such. This relationship is reasonable when considering the housing affordability issues for low-income people discussed earlier. TNB's market share for low-income borrowers substantially met its overall market share, while its market share for moderate-income loans exceeded its overall market share.

Refinance loan borrower distribution is good. The portion of loans made to moderate-income borrowers is near to the portion of families that are defined as such. The portion of loans made to low-income borrowers is below the portion of families defined as such. This relationship is reasonable when considering the housing affordability issues for low-income people discussed earlier. The market share for such loans exceeds TNB's overall market share for both low and moderate-income borrowers.

Small Loans to Businesses

Refer to Table 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate in the full scope AA. The portion of TNB's loans to small businesses (businesses with revenues of \$1 million or less) is below the portion of businesses that are defined as such. The portion of loans of \$100,000 or less represented significantly more than half of the bank's small business loans.

Community Development Lending

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

TNB's level of community development lending had a positive impact on the evaluation of its lending performance activity. TNB originated 12 Community Development Loans totaling approximately \$8 million dollars during the evaluation period. The CD loans met identified needs for affordable housing, small business financing and essential community services targeted to low and moderate-income families. TNB also originated several small business loans having a community development purpose, which are included with the small business loan data.

TNB originated a \$2.4 million loan to an area business to purchase an office building located in a low-income geography in the city of Albany. At the time of purchase, the property had a 50% vacancy rate. The property was improved and is now at full-occupancy helping to revitalize and stabilize the surrounding community and support permanent job creation, retention and improvement some of which will be for low and moderate income individuals. The business is considered a small business per the Small Business Administration's (SBA) size eligibility requirements for Small Business Development Companies and Small Business Investment Companies

TNB originated \$2.1 million in the form of a \$1.4 million mortgage refinance loan and a \$700 thousand working capital line to a local non-profit community service organization. The organization acts as a wholesale distributor, providing food and related household products to local community service groups. These service groups include food pantries, soup kitchens, emergency shelters, day care centers and residential programs primarily for low and moderate-income individuals.

TNB refinanced and reduced the interest rate on an existing \$1.6 million mortgage for an area non-profit labor organization. The mortgage is on a property located in

a low-income geography. The mortgagee leases the property to commercial tenants. The major tenant went out of business prior to the refinance, vacating a large portion of the property. By obtaining refinancing at a lower interest rate, the organization was able to lower the rents allowing a current tenant, who provides mental health services primarily to individuals of low or moderate income, to expand into the abandoned space. This expansion helped to support permanent job creation, retention and improvement in this low-income geography. The loan also helped stabilize the area, by quickly alleviating a building vacancy.

TNB originated a \$1.1 million purchase money loan for the construction of a new office and laboratory building located in a moderate-income geography in the city of Schenectady. The financing allowed for the expansion of an existing business and was supplemented by additional financing of \$155 thousand from the Schenectady Economic Development Corporation. This helped to support permanent job creation, retention and improvement in a moderate-income geography. The business is considered a small business per the Small Business Administration's (SBA) size eligibility requirements for Small Business Development Companies and Small Business Investment Companies

TNB extended a \$750 thousand line of credit to an affordable housing organization. The organization provides affordable housing loans, home purchase counseling and debt counseling for individuals of low or moderate-income in the greater Albany area.

TNB originated three loans totaling \$69 thousand for a non-profit mental health association in the city of Schenectady. The organization provides day treatment services to the mentally ill, 24 by7-day housing and treatment services, group and individual family support services and a short-term rehabilitation program to help individuals set and obtain their goals. A majority of the organization's clients are low income individuals who receive Medicaid.

TNB along with several other community lenders each originated a loan in the amount of \$25 thousand into a micro-enterprise fund. The fund was established to provide financing for businesses who promote and maintain employment opportunities in Saratoga County. The fund provides loans up to \$50 thousand to small businesses of up to 100 employees, helping to support permanent job creation, retention and improvement for persons of low or moderate income.

TNB originated a \$20 thousand loan to a non-profit organization whose primary goal is providing affordable housing to low and moderate income individual in the Albany community. The organization purchases and renovates properties in low

and moderate-income geographies. The organization also owns and manages 160 rental units, which are rented primarily to low-income renters.

TNB originated a \$15 thousand line of credit in the form of a credit card to a non-profit ecumenical partnership serving the greater Schenectady area through various community programs. The programs provide assistance primarily for individuals of low and moderate income in the form of food, shelter, drug and family counseling and job training.

Product Innovation and Flexibility

TNB's innovative and flexible lending activity had a positive impact on the evaluation of its lending performance.

TNB has continued its Affordable Housing Program (AHP), which was instituted in 1990. The program offers 100% financing, with 90% financing through a maximum 30 year first mortgage and the remaining 10% through a simultaneous maximum 20 year second mortgage. The second mortgage is at the same interest rate as the first mortgage. Borrowers in the City of Schenectady can apply to The Schenectady Housing Development Corporation for a 10% down-payment loan in lieu of the TNB second mortgage. The program is available throughout the AA to first time homebuyers with family incomes that do not exceed the moderate-income guidelines. Closing costs are reduced by \$500 from the closing costs the bank requires for a conventional mortgage. Since the last review, TNB has enhanced the program by making the applications available in all of their branches and reducing the interest rate by a 1/4%. TNB opens a *Tax-Saver* savings account at closing for the customer to assist them in saving for tax and insurance payments. The bank contributes \$100 to the account. Sixty-five loans were made under this program throughout the AA during the evaluation period. In mid-1999 TNB offered many of its AHP borrowers with interest rates above 8% an opportunity to refinance their loans to a lower interest rate. To be eligible the borrower needed at least 12 months of satisfactory repayment history. The borrower was charged no closing costs and was given a \$100 mall gift certificate. Thirty-six customers accepted the offer.

TNB offers a Home Improvement Installment Loan targeted to low and moderate-income individuals. In response to a community credit need for more affordable home improvement financing the bank reduced the interest rate on this product from 12% to 9.5% in early 1999. TNB made further enhancements to the product in October 2000. Under the enhanced program, individuals who obtain certification from a local housing agency that they have received financial counseling, are eligible for an 8% interest rate. The loan is unsecured and available in amounts

from \$1,000 to \$5,000 for a term of up to 5 years. Thirty-five loans were made under this program at the rate of 9.5% and eight loans were made under the enhanced program throughout the AA during the evaluation period.

TNB began participating with Union College in the Union Schenectady Initiative. The goal of the Initiative is to revitalize the low and moderate-income geographies surrounding the college by rehabilitating the properties and providing incentives to encourage owner occupancy. TNB committed \$500,000 over the next five years (maximum of \$100,000 per year) to provide reduced application and closing costs and grant funds. On all applications for residential purchase money mortgages received from the project area, TNB will provide a discount of 50% off of its application fee of \$250 and settlement fee of \$500, for a savings of \$375 to each borrower. Further, for each approved application within the project area involving a conversion from non-owner to owner-occupied status TNB will provide the purchaser a grant of 5% of the purchase price of up to \$2,500, which can be used for any purpose elected by the recipient. This is a relatively new program. Consequently, TNB has originated only one loan under this program during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Glens Falls MSA AA is not inconsistent with the bank's overall "High Satisfactory" rating.

TNB's performance in the Non MSA AA was weaker than its performance in the full scope AA based on the data presented in the lending tables. There were several categories where performance was poor or adequate. The most significant of these was the borrower distribution of home purchase loans, where the portion of loans made to low-income people was poor in relation the portion of families defined as such. The weaker performance in the Non MSA AA did not have a negative impact on the lending test conclusions and rating. Refer to Tables 1 through 11 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on this full-scope review, the bank's performance in the Albany Troy Schenectady MSA is adequate.

Refer to Table 12 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

TNB's community development investments are considered to be adequate in relation to the bank's size and resources. In its investing activities, TNB exhibited a good responsiveness to credit and community development needs. Community development investment opportunities are available in the AA. Please refer to the Profile section in Appendix B for a discussion of the opportunities.

TNB's qualified investments made during the evaluation period consist of a \$1 million investment in the Statewide Zone Capital Corporation of New York, and qualifying grants and donations totaling \$274 thousand. None of the investments are considered complex or innovative.

Some of the major investments during the evaluation period include:

- Statewide Zone Capital Corporation of New York - TNB made a \$1,000,000 investment in this corporation. The corporation was formed in July 1999 to promote the development of new businesses, the expansion of existing businesses, and the development of human resources within 51 economic development zones created under the New York State Economic Development Zones Act. These zones are located in distressed areas with elevated poverty and unemployment levels. Although the corporation did not book any loans as of the examination date, state representatives indicate \$6,000,000 is approved for funding. TNB was one of the first banks to pursue this type of investment, and has served as a reference to other banks considering this type of qualified CRA investment.
- TNB contributed \$52,000 to a non-profit organization involved with solving human service problems. The non-profit organization funds various affordable housing and community service related non-profit organizations that predominantly serve low and moderate-income families.
- In April 1999, the bank donated a parcel of property to Union College of Schenectady, New York for rehabilitation and further utilization in support of the Union College-Schenectady Initiative Program. The property is located in a moderate-income geography. The Union College-Schenectady Initiative Program calls for the rehabilitation of a low-income, decaying neighborhood outside the Union College campus. The contribution amounted to \$35,000.
- The bank donated \$15,000 to the Rensselaer County Community Housing Resource Board during the evaluation period for the Mini-Repair Program. RCCHRB is a non-profit organization that provides housing related services and opportunities for low and moderate income households. The Mini-Repair Program provides free labor to homeowners with both limited incomes and physical limitations to maintain their homes. The program has assisted 70 low or moderate-income homeowners since July 1999.
- The bank converted a \$10,000 debenture, issued in March 1999, into grants during the evaluation period for the Capital District Community Loan Fund. The fund pools investments from individuals and institutions. It then makes loans to local groups for housing and economic development projects that benefit low-income people, at terms that are appropriate for each project. The loan fund also assists loan applicants in other financial matters. Loans are also available to nonprofit community-based groups and small businesses located in low income neighborhoods.

The remaining grants and contributions made during the evaluation period were made to 55 organizations, the vast majority serving affordable housing or community service needs primarily serving low and moderate-income people. Thirteen thousand dollars was allocated to several organizations for financial literacy and credit education initiatives.

TNB also has a prior period investment of \$1.8 million in a mortgage back security at December 31, 2000. The underlying collateral for the mortgage back security consists entirely of mortgage loans to low and moderate-income borrowers located in the assessment area. This prior period investment played an important role by increasing liquidity in the assessment area for the potential funding of additional affordable housing. The investment was pro-rated on Table 12 based on the deposits domiciled in each AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Glens Falls MSA and the Non-Metropolitan AA is not inconsistent with the bank's overall performance under the investment test. Refer to Table 12 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Albany-Troy-Schenectady MSA is good.

Retail Banking Services

Refer to Table 13 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

TNB's service delivery systems are accessible to geographies and individuals of different income levels in the assessment area. Retail banking services are good, in the assessment area. The branch distribution in low-income geographies is excellent in relation to the population distribution in such geographies. The branch distribution in moderate-income geographies is slightly below the population distribution in such geographies.

The branch network expanded by one branch since the last evaluation. A branch was opened in the Town of Milton, a middle income geography. There were no branch closings in the AA during the evaluation period.

Office hours and services are comparable among locations regardless of the income level of the geography. Branch hours of service vary by branch based on the bank's analysis of competition, community needs, lobby traffic, and alternative delivery systems. All branch offices offer extended hours on various days of the week. Saturday hours are offered in 42 of the 46 branches. This includes six of the eight branches located in low and moderate-income geographies.

TNB offers alternative delivery systems in the form of ATMs. A substantial majority of the bank's ATMs are located in this AA, including 80% of the 15 ATMs placed into service since the last evaluation period. Three ATMs were opened in either low or moderate-income geographies. The geographic distribution of the bank's ATMs in the various categories of income geographies is similar to its branch distribution. Customers and non-customers alike can access their accounts through TNB ATMs which are connected to the NYCE and PLUS ATM systems. Customers may also use their TNB ATM card to obtain cash at non-proprietary

ATMs throughout the world, which bear the NYCE or PLUS logos. All of the ATMs in the low-and moderate-income geographies are accessible 24 hours every day.

TNB also offers alternative delivery systems of bank-by-phone and bank-by-mail. We did not place significant weight on the alternative delivery systems because no data was available to determine the effectiveness of delivering retail banking services to low and moderate income geographies and to low and moderate income individuals.

Community Development Services

TNB demonstrated good performance in providing community development services.

Management and bank employees continue to support various organizations in the communities served by the bank by offering financial and technical expertise to such groups. Numerous personnel are members of the boards of directors or finance committees.

Affordable Housing Partnership - A bank officer serves on the Board of Directors of this nonprofit organization which provides counseling services to low and moderate income homeowners in County of Albany.

Albany Housing Coalition - A bank officer serves on the Board of Directors of this organization that provides counseling services to low and moderate income homeowners and renters in the City of Albany. The Coalition also provides transitional and permanent housing, support services coordination for veterans, and housing development in the form of rehabilitation, new construction, and housing management.

Better Neighborhoods, Inc. - A bank officer serves on the Board of Directors and Finance Committee of this nonprofit corporation serving the Hamilton Hill and Vale neighborhoods of Schenectady. This area consists primarily of low and moderate income geographies. This organization offers a variety of housing renovation and community service activities benefiting low and moderate income families and first time homebuyers.

Habitat for Humanity - Capital District - A bank officer serves on the finance committee of this organization. This organization provides affordable housing to mostly low-income individuals and families. This is accomplished primarily through a home building partnership between the organization's client and volunteer labor.

Bottomless Closet of Schenectady, Inc. - A bank employee serves on the Board of Directors of this organization that provides career clothing to low income women who are graduates of a job readiness program. Additional services include workshops in job support skills, job survival skills, and life skills.

DePaul Management Corp. - An officer serves on the finance committee of this organization that provides housing to low and moderate income senior citizens under a program offered by the Department of Housing and Urban Development. This facility is located in Albany.

Predatory Lending Task Force - A bank officer is taking a leadership role in discussing predatory lending issues with various nonprofit organizations. The task force is in the early stages of developing strategies to combat predatory lending targeted at lower income residents and increase community awareness of such practices.

Schenectady Family Health Services - An employee serves on the Board of Directors of this non-profit organization that provides comprehensive medical, dental and social work services to low and moderate income families in Schenectady County.

Carver Community Center - An employee serves on the Board of Directors and as the Youth Activity Chairperson. This organization oversees Family Health Services of Schenectady, day care and Headstart programs, and an after school program. The clientele for a majority of the programs are from low and moderate income families. This center targets Hamilton Hill, a low-income geography in Schenectady.

Home Furnishings Program, Inc. - A bank officer sits on the Board of Directors and finance committee of this organization that provides services for homeless people throughout the day. Additionally, it provides overnight shelter, day program services, a community breakfast program, and a clothing pantry. This organization serves Schenectady County.

Regional Food Bank of Northeastern New York - An employee serves on the Board of Directors and planning committee. This organization provides food indirectly to those in need through local food pantries and soup kitchens. The food bank serves Albany, Columbia, Fulton, Greene, Montgomery, Rensselaer, Saratoga, Schenectady, Schoharie, Warren, and Washington Counties.

Project Touch - Teens Offering Understanding and Compassion to Persons with HIV - A bank officer serves on the Finance and Advisory Boards of this organization.

This organization pairs up high school students with young children who are somehow affected by HIV. All current program participants are from low or moderate-income families.

Statewide Zone Capital Corporation - An executive officer serves on the Board of Directors of this organization. This organization was formed to promote the development of new businesses, the expansion of existing businesses, and the development of human resources within the economic development zones created under the State Economic Development Zones Act. These zones are located in distressed areas with elevated poverty and unemployment levels.

Parsons Child and Family Center - A bank officer sits on the Board of Directors of this agency. This agency provides services that enable children and families to reach their potential, always respecting the dignity of every individual, the importance of family and enduring relationships. All of the clients of the agency are low income.

Project Safe - An employee sits on the Board of Directors of this agency. The mission of Safe, Inc. is to serve the youth and young adults who are at risk of sexual exploitation or have been sexually exploited. Safe also serves youth and young adults to become self-sufficient and productive with the attention of good citizenship. The client base served by this organization is predominantly low-income.

Saratoga Economic Development Corporation (Saratoga EDC) - An officer is on the loan committee of this corporation. The loan fund was created to finance small and start-up businesses in Saratoga County. The Saratoga EDC administers a revolving loan fund and provides technical assistance to those companies that receive loans.

Schenectady Economic Development Corporation (Schenectady EDC) - An executive officer serves as a director of this private non-profit corporation. The main mission of the Schenectady EDC is to assist existing companies to expand, attract new companies to the community, and provide small business assistance programs. Primary emphasis is on revitalizing the City of Schenectady. The Schenectady EDC was the main force in finding an alternative location for the largest HMO in the area. The new location will be in a moderate-income geography. The EDC assistance helped retain 450 jobs and will result in 150 additional jobs in Schenectady, primarily for low and moderate-income individuals.

TNB provides check cashing services at its branch offices to customers of a Community Development Financial Institution (CDFI). The service is provided primarily to low-and moderate-income individuals at no cost. The bank entered into

a check cashing arrangement with Albany Community Development Credit Union, a Treasury certified CDFI, in 1999. This neighborhood-based credit union is located in the Arbor Hill section of Albany, a low-income geography.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Glens Falls MSA and the Non-Metropolitan AA is stronger than the bank's overall performance under the Service Test. Both assessment areas have excellent branch distribution in moderate-income geographies in relation to the population distribution. Refer to Table 13 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (10/01/98 to 12/31/00) Investment and Service Tests and CD Loans: (11/02/98 to 02/05/01)	
Financial Institution	Products Reviewed	
Trustco Bank, National Association (TNB) Schenectady, New York)	Home Purchase, Home Improvement and Refinance Loans reported on the HMDA LAR, as well as Small Business Loans and CD Loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Portions of Albany-Schenectady-Troy MSA #0160	Full-Scope	See "Descriptions of Assessment Areas"
Portions of Glens Falls MSA #2975	Limited Scope	
Non-metropolitan Area - Portions of Columbia and Greene Counties	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Albany-Schenectady-Troy MSA AA.....	B-1
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Albany-Schenectady-Troy MSA

Demographic Information for Full-Scope Area: Albany-Schenectady-Troy						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	186	4.30	17.20	55.38	22.04	1.08
Population by Geography	767,556	3.54	13.94	57.02	25.28	0.22
Owner-Occupied Housing by Geography	186,119	1.11	9.59	60.71	28.58	0.00
Businesses by Geography	29,664	8.03	12.42	53.73	25.82	0.00
Farms by Geography	1,012	.40	5.43	72.53	21.64	0.00
Family Distribution by Income Level	196,257	16.45	18.19	25.43	39.93	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	68,314	6.32	21.36	58.73	13.59	0.00
Median Family Income	\$41,487	Median Housing Value				= \$99,594
HUD Adjusted Median Family Income for 2000	\$51,300	Unemployment Rate				= 3.1%
Households Below the Poverty Level	8.79%					

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Albany-Schenectady-Troy AA consists of Rensselaer County, Schenectady County, the eastern half of Schoharie County, and major portions of Albany and Saratoga Counties. The rural northwest portion of Saratoga County and the extreme southern and southeastern portions of Albany County are excluded from the AA. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The AA includes 186, or 86%, of the 216 census tracts in the Albany-Schenectady-Troy MSA. The composition of the AA geographies by income level is: 4% low-income, 17% moderate-income, 56% middle-income, 22% upper-income, and 1% not designated. The two geographies with no designation are college campuses.

The Albany-Schenectady-Troy AA is by far the largest of the bank's three AA(s). This AA contains 85% of the population and geographies of the bank's total

population and geographies. Most of the bank's resources are located and expended in the AA. Branches and ATMs in the AA represent 85% and 86% of the total number of bank offices and ATMs, respectively. Deposits domiciled in the AA as of June 30, 2000 and loan originations in the AA for the evaluation period represent 90% of the bank's total deposits and 86% of loan originations for the evaluation period, respectively.

The competition among financial service providers is very strong. TNB competes with three large interstate regional banking companies, numerous community banks and savings banks, large mortgage companies, and several credit unions. TNB's market share of deposits in the AA is 14.65% as of June 30, 2000 according to the FDIC market share report. The bank retained its number two ranking by deposits since the last examination. The market share report also indicates TNB and Keybank have the largest branch networks in the AA with 48 branches each. TNB also operates a network of 42 ATMs in the AA. TNB is a full service lender offering a broad menu of lending products that include business loans, home mortgage loans, home equity loans, and consumer loans. The bank's business focus is primarily on residential mortgage lending and commercial lending to a lesser extent.

Eighty-one percent of the housing in the AA is one to four family units, 14% is multifamily units, 4% is mobile homes, and 1% is condominiums. Of total housing units, 59% is owner-occupied, 34% is renter-occupied, and 7% is vacant. The median housing value was \$99,594 in 1990. The mean sales price of existing homes increased only 2.4% from 1991 to 1999. Housing stock consists mostly of older homes with the median year built of 1954. Housing units in the low and moderate income geographies are older than the average, the median years built being 1939 and 1941, respectively.

According to the 2000 business demographics there are 30,676 businesses, of which 1,012 are farms in the AA. Small businesses represent 87% of the businesses reporting revenues. Approximately 76% of businesses reported having less than 10 employees. The primary industries in the AA are services 43%, retail trade 21%, and construction 10%. The MSA experienced a net loss of 28,000 high paying manufacturing jobs (or 42%) from 1977 through 1999. In addition, the state government decreased its workforce employed in the AA by 5,600 employees, or 31%, between 1995 and 1998. Major employers in the AA include New York State, General Electric, Albany Medical Center, St. Peter's Health Care Facilities, Verizon Corporation and Golub Corporation.

The Executive Summary of the 2000 Economic Outlook for the Capital District reported total public and private sector employment in the Albany-Schenectady-Troy MSA rose by 11,800 jobs or 2.7% in 1999 to a new all-time high of 451,500.

Other positive factors supporting the moderate economic growth in the AA are increases in total occupied commercial office space, transportation hub activity, and existing home sales. Unit sales of existing homes in the AA were up 545 or 8.3% in 1999, following an 861 unit, 15% increase in 1998.

The same report identified various declining indicators including the continued loss of manufacturing jobs, the decline of the number of units for which building permits were issued, and the tenth consecutive year of decline of median selling price (constant dollars) of existing houses, and out-migration according to IRS Migration data. Between 1992 and 1997, the Capital Region lost 22,625 taxpayers and their dependents according to the latest IRS data, a 3.7% decline.

Community development investment opportunities are available, in the assessment area, especially for community development lending and services. Community development investment opportunities are also available based on our community contacts, OCC internal resources, bank management, and public information. Examples of the types of qualified investments include, mortgage backed securities, tax credits, affordable housing, and small business investment company (SBIC) programs.

Two meetings were held during the examination with representatives of affordable housing organizations, a public official, and a representative of small business organization. The community contacts identified credit needs of the community to include a need for additional affordable housing loans, a combined purchase and rehabilitation mortgage product, small dollar business loans, and a longer term, higher dollar amount loan for home improvements. The contacts indicated some low and moderate-income individuals are victims of predatory lenders, and expressed a need for increasing public awareness of this issue. The contacts also stated the need for additional involvement by banks in foreclosure prevention and homeowner/mortgage counseling activities. These two issues were raised two years ago in our community meetings.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- 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 Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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 11. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods

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

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Appendix V: Standardized Tables

General Information

A set of mandatory standardized tables has been developed to improve the consistency of the presentation of data used in the evaluation in the PE.

The following are important facts to remember:

- The tables are **mandatory** for all banks evaluated using the large bank CRA examination procedures.
- The tables will always be included in the appendix section of the PE.
- A **separate set of tables** is to be completed for each rating area. A rating area is an area for which an overall rating and lending, investment, and service test ratings are assigned. Such areas will either be a state or a multistate MSA. Within a rating area, data for each MSA and full-scope non-metropolitan AAs will be presented on a separate line. Non-metropolitan AAs not chosen for full-scope reviews should be aggregated and reported on one line, unless the geographic proximity or anomalies in performance context would preclude such a combination.
- With the exception of community development loans, the evaluation period for the lending test should include all full calendar years since the ending date of the evaluation period of the last CRA examination. Current year-to-date (YTD) quarter-end loan data may also be included, if at least two quarters of data are available. If the evaluation period of the last CRA examination included YTD quarter-end loan data, the evaluation period for the current CRA examination may include loan data for the remaining quarters in that year. For community development loans and the service and investment tests, the evaluation period should run from the ending date of the last CRA evaluation period to the start date of the CRA data analysis phase.
- Data for the entire evaluation period should be combined in one table, i.e., you do not need a table for 1996 data and another table for 1997 data. Market share information contained in the tables should be for one year only and should always be for the most recent year that aggregate data are available.
- Loan data should always include loans originated AND purchased by the bank or any affiliates of the bank which the bank has provided for consideration.

- Whenever a table has a column for a “% of Total,” the percentage should be of the total for the rating area, not the overall bank.
- Tables 2 through 6 and Tables 13 and 14, which contain information relating to distribution by income level of geography, do not include a column for geographies that have not been assigned an income classification. These are commonly referred to as “NA” geographies. As such, the sum of the distribution in low-, moderate-, middle-, and upper-income geographies in an AA may not equal 100 percent.
- For non-HMDA reporters, examiners will complete as much of the information in the home mortgage lending tables as is feasible. The examiner should refer to the “Loan Sampling Guidelines for Small Bank CRA Examinations” for guidance on selecting a sample to evaluate the bank’s in/out ratio and borrower and geographic distribution and, if applicable, to test the accuracy of the bank’s own analysis. Examiners can find the guidelines on the OCCnet’s Community and Consumer Policy site. No market share information will be available.
- Table 14 is an **optional table** that should be included only if the bank has provided consumer loan information for consideration or if consumer lending constitutes a substantial majority of the bank’s business. If consumer loans are not considered, this table should be deleted.
- When feasible, affiliated entities should be combined when determining market share. A list of the groupings for the largest banking companies supervised by the OCC can be found on the Community and Consumer Policy Web site under CRA.

Content of Standardized Tables (Examiner Guidance Discussion)

The following is a listing and brief description of each table included in the set of standardized tables. Also included is other information to assist the examiner in interpreting the tables. For non-HMDA reporting banks evaluated using the large bank CRA examination procedures, market share information is not applicable.

Table 1. - Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/AA.

The deposit data contained in this table is obtained from the FDIC web site www.fdic.gov and is available only as of June 30 of each year. The percentage distribution of bank deposits by MSA/AA within a rating area compared to the percentage distribution of bank loans facilitates identification of MSAs/AAs not well served by the bank.

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 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 aggregate 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 AAs.

Table 6. - 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 aggregate 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 AAs.

Table 7. - Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/AA. The table also presents market share information based on the most recent aggregate market data available.

Table 8. - Borrower Distribution of Home Improvement Loans - See Table 7.

Table 9. - Borrower Distribution of Home Mortgage Refinance Loans - See Table 7.

Table 10. - 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.

It may not be feasible to perform a meaningful analysis of the distribution of loans by revenue size of business, if the percentage of loans originated and purchased by the bank for which revenue size of the business is unknown is high.

Table 11. - 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.

It may not be feasible to perform a meaningful analysis of the distribution of loans by revenue size of the farm, if the percentage of loans originated and purchased by the bank for which revenue size of the farm is unknown is high.

Table 12. - Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. It is recognized that some investments are not fully paid-in at inception. In those cases, bank reporting for financial statements and call reports govern the timing of recognizing the investments. 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. Unfunded commitments should be considered to gain an understanding of a bank's investment activity and capacity.

Table 13. - Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. - Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME		State: New York				Evaluation Period: October 1, 1998 TO December 31, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Albany-Schenectady-Troy MSA	85.86	4,295	398,010	400	60,721	0	0	12	8,079	4,707	466,810	90.0
Limited-Review:												
Glens Falls MSA	12.35	635	50,810	42	8,108	0	0	0	0	677	58,918	5.0
Non MSA	1.79	87	5,451	11	606	0	0	0	0	98	6,057	5.0

(*) Rated area refers to either the state or multistate MSA rating area.
 (**) The evaluation period for Community Development Loans is (November 2, 1998 to December 31, 2000).
 (***) Deposit data as of June 30, 2000. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE				State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Albany-Schenectady-Troy MSA	2,517	86.64	1.11	.48	9.59	5.40	60.71	52.88	28.58	41.24	6.67	4.10	4.62	6.16	8.23
Limited-Review:															
Glens Falls MSA	353	12.15	0.00	0.00	1.36	2.27	80.60	68.84	18.04	28.90	7.82	0.00	15.79	7.81	7.42
Non MSA	35	1.20	0.00	0.00	5.30	17.14	94.70	82.86	0.00	0.00	3.07	0.00	6.25	2.92	0.00

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area. (**) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(***)Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Albany-Schenectady-Troy MSA	290	83.82	1.11	1.03	9.59	4.14	60.71	62.07	28.58	32.76	3.92	8.00	3.37	3.91	3.96			
Limited-Review:																		
Glens Falls MSA	48	13.87	0.00	0.00	1.36	0.00	80.60	83.33	18.04	16.67	3.57	0.00	0.00	3.82	2.74			
Non MSA	8	2.31	0.00	0.00	5.30	0.00	94.70	100.00	0.00	0.00	2.04	0.00	0.00	2.31	0.00			

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

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

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			State: New York				Evaluation Period: October 1, 1998 TO December 31, 2000									
MSA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***					
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Albany-Schenectady-Troy MSA	1460	84.25	1.11	0.75	9.59	8.01	60.71	53.49	28.58	37.67	7.74	7.09	8.40	6.60	9.89	
Limited-Review:																
Glens Falls MSA	229	13.21	0.00	0.00	1.36	0.87	80.60	82.53	18.04	16.59	6.98	0.00	8.33	7.12	6.25	
Non MSA	44	2.54	0.00	0.00	5.30	2.27	94.70	97.73	0.00	0.00	7.76	0.00	5.00	7.92	0.00	

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 (**) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.
 (***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
				State: New York				Evaluation Period: October 1, 1998 TO December 31, 2000							
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Albany-Schenectady-Troy MSA	400	88.30	8.03	5.75	12.42	19.00	53.73	53.75	25.82	21.50	2.43	3.06	3.71	2.37	1.98
Limited-Review:															
Glens Falls MSA	42	9.27	0.00	0.00	41.60	0.00	73.57	54.76	22.27	45.24	2.00	0.00	0.00	1.81	3.21
Non MSA	11	2.43	0.00	0.00	6.79	0.00	93.21	100.00	0.00	0.00	0.25	0.00	0.00	0.32	0.00

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

(**) Source of Data-Dunn and Bradstreet.

(***) Based on [1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS				State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000									
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Albany- Schenectady-Troy MSA	0	0	.40	0	5.43	0	72.53	0	21.64	0	0	0	0	0	0
Limited-Review:															
Glens Falls MSA	0	0	0	0	0	0	92.22	0	7.78	0	0	0	0	0	0
Non MSA	0	0	0	0	0	0	100.00	0	0	0	0	0	0	0	0

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 (**) Source of Data-Dunn and Bradstreet.
 (***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: New York					Evaluation Period: October 1, 1998 TO December 31, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Full-Review:																
Albany-Schenectady-Troy MSA	2,517	86.64	16.52	3.62	18.18	15.26	25.45	27.10	39.85	53.08	6.67	5.08	5.91	6.96	9.12	
Limited-Review:																
Glens Falls MSA	353	12.15	16.14	2.55	17.96	17.28	26.40	25.50	39.50	53.54	7.82	2.70	8.58	8.87	9.59	
Non MSA	35	1.20	20.24	2.86	18.61	11.43	23.74	31.43	37.41	54.29	3.07	0.00	0.00	6.12	3.76	

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT				State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000									
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Albany-Schenectady-Troy MSA	290	83.82	16.52	6.21	18.18	23.79	25.45	26.90	39.85	42.76	3.92	3.46	5.74	3.66	3.70
Limited-Review:															
Glens Falls MSA	48	13.87	16.14	6.25	17.96	18.75	26.40	29.17	39.50	43.75	3.57	7.50	2.20	3.15	4.26
Non MSA	8	2.31	20.24	0.00	18.61	62.50	23.74	12.50	37.41	25.00	2.04	0.00	5.71	0.00	1.72

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

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Albany-Schenectady-Troy MSA	1,460	84.25	16.52	6.58	18.18	17.60	25.45	27.47	39.85	47.26	7.74	11.43	9.36	9.60	9.96			
Limited-Review:																		
Glens Falls MSA	229	13.21	16.14	2.62	17.96	12.23	26.40	29.69	39.50	55.02	6.98	1.54	5.79	8.73	9.72			
Non MSA	44	2.54	20.24	9.09	18.61	13.64	23.74	34.09	37.41	43.18	7.76	25.00	8.33	20.69	6.37			

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000				
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Albany-Schenectady-Troy MSA	400	88.30	86.70	64.00	62.41	17.79	19.80	2.43	2.99
Limited-Review:									
Glens Falls MSA	42	9.27	86.41	71.43	50.00	23.81	26.19	2.00	2.63
Non MSA	11	2.43	88.26	81.82	81.82	18.18	0.00	.025	0.38

(*) Small loans to businesses originated and purchased in the MSA/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.
 (***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4% of small loans to businesses originated and purchased by the bank.
 (****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: New York		Evaluation Period: October 1, 1998 TO December 31, 2000					
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 Businesses**	% BANK Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	
Full-Review:									
Albany-Schenectady-Troy MSA	0	0	96.84	0	0	0	0	0	0
Limited-Review:									
Glens Falls MSA	0	0	97.50	0	0	0	0	0	0
Non MSA AA	0	0	96.15	0	0	0	0	0	0

(*) Small loans to farms originated and purchased in the MSA/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 businesses.
 (***) 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 2% of small loans to businesses originated and purchased by the bank.
 (****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: New York Evaluation Period November 2, 1998 To February 5, 2001									
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Albany-Schenectady-Troy MSA	1	1,645	73	1,274	74	3,101	94	0	0
Limited-Review:									
Glens Falls MSA	1	91	1	1	2	92	3	0	0
Non MSA	1	91	1	1	2	92	3	0	0

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

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

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: New York				Evaluation Period: November 2, 1998 To February 5, 2001									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Albany-Schenectady-Troy MSA	90.0	46	85.2	7.0	11.0	63.0	19.0	0	1	0	0	1	0	4.3	17.2	55.4	22.0
Limited-Review:																	
Glens Falls MSA	5.0	5	9.2	0.0	20.0	40.0	40.0	0	0	0	0	0	0	0.0	2.5	80.6	16.9
Non MSA	5.0	3	5.6	0.00	33.3	66.6	0.00	0	0	0	0	0	0	0.0	9.7	90.3	0.0

