



Comptroller of the Currency
Administrator of National Banks

Public Disclosure

January 6, 1998

Community Reinvestment Act Performance Evaluation

**FirstBank of Silverthorne, N.A.
Charter Number: 17948**

**160 U.S. Highway 6
Silverthorne, Colorado 80498**

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NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **FirstBank of Silverthorne, N.A.**, prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **January 6, 1998**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

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

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

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

Census Tract (CT) - Small, locally defined statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

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

Median Family Income (MFI) - The median income determined by the United States Census Bureau every 10 years and used to determine the income level category of census tracts. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

Small Farm Loans - Loans with an original amount of \$500,000 or less for which the bank is required to collect and report certain monitoring data under the CRA regulation.

CRA Rating

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

The major factors which support this rating include:

- ▶ Lending activity reflects good responsiveness to credit needs with 88% of the number of loans originated within the assessment area.
- ▶ Loan distribution to borrowers of all incomes and businesses of different sizes is good.
- ▶ Investment and grant activity is satisfactory. The bank continues to carry one community development investment totaling \$220,000 and provided seven grants during the review period totaling \$8,206.
- ▶ Delivery systems are reasonably accessible and convenient to all parts of the assessment area.

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

| Performance Levels | FirstBank of Silverthorne, N.A. Performance Tests | | |
|---------------------------|--|-----------------|--------------|
| | Lending Test * | Investment Test | Service Test |
| Outstanding | | | |
| High satisfactory | X | | |
| Low satisfactory | | X | X |
| Needs to improve | | | |
| Substantial noncompliance | | | |

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

Description of Institution

FirstBank of Silverthorne, N.A., (FBS) is located in the mountain community of Silverthorne, Colorado. The bank operates one banking office, a full-service ATM, and a limited-service ATM in Silverthorne. FBS also offers 24-hour telephone banking. FBS reported total assets of \$72 million and net income of \$757,000 as of June 30, 1997.

FBS offers a wide range of loan products including real estate, consumer, credit card, and commercial loans. The bank's primary lending focus is residential real estate. The following table illustrates the composition of the loan portfolio by type of lending product.

| LOAN PORTFOLIO COMPOSITION | | |
|-----------------------------------|-----------------------------|--------------------------------------|
| June 30, 1997 | | |
| Loan Type | Amount \$(000's) | Percentage of Total Loans |
| Residential Real Estate | \$42,819 | 82% |
| Commercial Real Estate | 5,792 | 11% |
| Consumer | 2,248 | 4% |
| Commercial | 789 | 2% |
| Other | 236 | 1% |
| Total Loans | \$51,884 | 100% |

Source: June 30, 1997, Call Report.

FBS is a wholly owned subsidiary of FirstBank Holding Company of Colorado (FHCC). FHCC is a multibank holding company headquartered in Lakewood, Colorado. FHCC is the largest, locally owned banking organization in Colorado with total assets of \$2.9 billion and net income of \$25.1 million as of June 30, 1997.

FBS's performance under the Community Reinvestment Act was last evaluated as of November 23, 1994. The bank's performance was rated "Outstanding Record of Meeting Community Credit Needs."

Description of Assessment Area

FBS's assessment area is located in a Non-Metropolitan Statistical Area (Non-MSA). It encompasses all of Summit County and contains five block numbering areas (BNAs). There are no low-, moderate-, or middle-income geographies in the bank's assessment area. The following table provides demographic data, including income characteristics of the families in the assessment area.

| ASSESSMENT AREA PROFILE | | | | | | |
|--------------------------------------|----------|-----------|-----------------------|----------------------------|--------------------------|-------------------------|
| Non-MSA (Summit County) | | | | | | |
| Demographic Characteristics | # | \$ | Low % of # | Moderate % of # | Middle % of # | Upper % of # |
| Population (#) - 1990 | 12,881 | | 7% | 8% | 20% | 65% |
| Median Income (\$) - 1997 | | \$ 57,400 | | | | |
| Block Numbering Areas | 5 | | 0% | 0% | 0% | 100% |
| Unemployment Rate - 12/31/96 | 3% | | | | | |
| Owner Occupied Housing (#) | 2,570 | | 0% | 0% | 0% | 100% |
| Median Housing Value (\$) - 06/30/97 | | \$207,722 | | | | |
| Small Businesses | 1,241 | | 0% | 0% | 0% | 100% |

Source: Unless otherwise noted, 1990 U.S. Census data.

The assessment area is located 75 miles from the Denver metropolitan area and is roughly split in half by Interstate 70, the county's main access route. The 1997 Housing and Urban Development (HUD) estimated median family income is \$57,400. The county's major towns include Breckenridge, Silverthorne, Frisco, and Dillon. Summit County has four world-class ski resorts, which together have often been called the finest skiing in the world. Approximately three million people visit Summit County each year to ski.

There are 17,081 housing units in the assessment area. A majority of the units serve as either second homes or temporary rental units. Only 30% of the units are occupied full time and only 15% are owner occupied. According to the 1990 U.S. Census, the average year built for homes was 1978. Notable is the number of multifamily units, 9,645 compared to 1-4 family units of 6,760. The average price of a single-family home was \$255,000; for a duplex it was \$209,000; and for a multifamily unit it was \$190,000 as of June 30, 1997.

Employment and job creation in Summit County is strong. Data, as of December 31, 1994, indicates the service and retail trade industry dominate this market with 69% of the job force. Major employers are Vail Associates, Copper Mountain Ski Area, Dundee Realty, A-Basin Ski Area, and the Village at Breckenridge. Most other businesses are relatively small with revenues of less than \$1 million. Unemployment was at 3% as of December 31, 1996. For January 1997, the unemployment rate for the State of Colorado was 3.3% and the national rate was 5%.

Community Credit Needs

We identified community credit needs through a review of recent community contacts by the bank regulatory agencies. Affordable housing loans, for both rental and owner-occupied housing, and small business loans were identified as the primary credit needs of the area. However, the bank's ability to originate affordable housing loans is limited by the lack of affordable housing. The lack

of affordable housing is exacerbated by many rental housing units being converted to overnight lodging units. Also, the high cost of land, coupled with higher than average construction costs in mountain areas, has kept the supply of affordable housing well below demand.

Conclusions with Respect to Performance Tests

LENDING TEST

In assessing lending performance, we focused on FirstBank of Silverthorne, N.A.'s lending activity; assessment area concentration; geographic distribution of loans; borrower profile; responsiveness to credit needs of low- and moderate-income persons or small businesses; community development lending; and product flexibility. (Unless otherwise indicated, YTD 1997 means as of June 30, 1997.)

Conclusions:

The bank's lending performance within its assessment area is rated as "High Satisfactory." This rating is based on the following:

- ▶ FBS's lending level reflects good responsiveness to the credit needs of its assessment area.
- ▶ FBS originated 88% of its loans within its assessment area.
- ▶ FBS's loans are fairly evenly distributed throughout the five BNAs in the assessment area.
- ▶ FBS's loan distribution to borrowers of all income levels and businesses of different sizes is good.

Lending Activity

The loan-to-deposit ratio has remained fairly stable during the past two years. The bank's eight-quarter average loan-to-deposit ratio expressed as a percentage was 78% as of June 30, 1997. This is higher than that of similarly situated banks whose eight-quarter average loan-to-deposit ratios range from 62% to 72%.

Lending levels reflect good responsiveness to credit needs in the bank's assessment area. The following table shows FBS originated a high percentage of its loans in the assessment area. The bank originated 1,006 loans totaling \$38 million within the assessment area. This represents 88% of the total number and 91% of the total dollar volume.

| |
|---|
| VOLUME OF FIRSTBANK OF SILVERTHORNE, N.A.'S LOAN ORIGINATIONS IN 1996 and YTD 1997 |
|---|

| Product | Total Originations | | Within Assessment Area | | | |
|-----------------------------------|--------------------|-----------------|------------------------|------------|-----------------|------------|
| | # | \$(000) | # | % | \$(000) | % |
| Motor Vehicle Loans | 111 | \$ 1,084 | 101 | 91% | \$ 1,001 | 92% |
| Home Equity Loans | 261 | \$10,914 | 237 | 91% | \$10,062 | 92% |
| Other Secured Loans | 122 | \$ 9,096 | 108 | 89% | \$ 7,785 | 86% |
| Other Unsecured Loans | 417 | \$ 896 | 341 | 82% | \$ 771 | 86% |
| Total Consumer Loans | 911 | \$21,990 | 787 | 86% | \$19,619 | 89% |
| Total Small Business Loans | 151 | \$ 8,359 | 139 | 92% | \$ 7,298 | 87% |
| Home Purchase/Refinance Loans | 85 | \$11,900 | 80 | 94% | \$11,501 | 97% |
| Home Improvement Loans * | 0 | \$ 0 | 0 | 0% | \$ 0 | 0% |
| Multifamily Loans* | 0 | \$ 0 | 0 | 0% | \$ 0 | 0% |
| Total Home Mortgage Loans | 85 | \$11,900 | 80 | 94% | \$11,501 | 97% |
| Total Community Development Loans | 0 | \$ 0 | 0 | 0% | \$ 0 | 0% |
| Grand Total Loans | 1,147 | \$42,249 | 1,006 | 88% | \$38,418 | 91% |

Source: Bank-prepared Consumer and Small Business Loan Data Collection Registers and HMDA Loan Application Register.

* FirstBank of Silverthorne, N.A., is not in an MSA and does not track home improvement or multifamily loans separately. The number and dollar volume are included in the Consumer - Other Secured loan totals.

Consumer loans account for the largest segment of lending at 78% of the number and 51% of the dollar volume of loans originated in the assessment area during 1996 and YTD 1997. During the review period, the bank originated 787 consumer loans totaling nearly \$20 million. About one-third of the consumer loans are Cash Reserve loans (check credit) which have a low dollar limit. The volume of consumer lending is consistent with the bank's asset size and lending focus.

Home purchase and refinance loans account for 30% of the dollar volume and 8% of the number of all loans originated in 1996 and YTD 1997 in the assessment area. During the review period, the bank originated 80 home mortgage loans totaling \$11 million. (It is important to note that home improvement loans are included in "Consumer - Other Secured Loans.") This lending activity is consistent with the bank's asset size and lending focus and with housing and lending opportunities.

The volume of small business lending is reasonable considering the bank's asset size and lending focus. FBS originated 139 loans totaling \$7 million to small businesses during 1996 and YTD 1997. This represents 19% of the dollar volume and 14% of the number of loans.

Geographic Distribution of Loans within the Assessment Area

The bank's assessment area consists of only upper-income geographies. Therefore, an analysis of loan distribution based on income level of geographies is not meaningful. A review of loan distribution indicates the bank is making loans of all types to borrowers of all income levels in its assessment area.

Distribution by Borrower Income within the Assessment Area

The table below summarizes FBS's lending activities within the assessment area by product type, income level of BNA, and income level of the borrower.

| LENDING TEST: 1996 and YTD 1997 | | | | | | | |
|--|--------------|-----------------|-----|------------|-----------------|---------------|--------------|
| BNAs of Summit County | | | | | | | |
| Loan Type | # | \$ (000) | BNA | Low % of # | Moderate % of # | Middle % of # | Upper % of # |
| | | | B | | | | |
| Residential - Home Purchase | 38 | \$ 5,858 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 3% | 16% | 21% | 60% |
| Residential - Refinance | 42 | \$ 5,643 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 10% | 12% | 31% | 47% |
| Residential - Home Improvement* | 0 | \$ 0 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 0% | 0% | 0% | 0% |
| Consumer - Motor Vehicle | 101 | \$ 1,001 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 40% | 15% | 25% | 20% |
| Consumer - Home Equity | 237 | \$10,062 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 6% | 17% | 29% | 48% |
| Consumer - Other ** | 449 | \$ 8,556 | BNA | 0% | 0% | 0% | 100% |
| | | | B | 23% | 15% | 10% | 21% |
| Small Business | 139 | \$ 7,298 | BNA | 0% | 0% | 0% | 100% |
| Total Lending | 1,006 | \$38,418 | | | | | |

Source: Bank-prepared Consumer and Small Business Loan Data Collection Registers and HMDA Loan Application Register.

* Residential - Home Improvement loans are not tracked separately. They are included in consumer loan totals.

** Borrower income is not available for check credit loans which represent 31% of Consumer - Other loans.

BNA = Block Numbering Area.

B = Borrower.

Data indicates weak distribution of home mortgage loans to low-income borrowers, and somewhat weak distribution of home refinance loans. However, the bank's ability to originate home purchase loans is hampered by the lack of affordable housing in the assessment area. The bank originated one home purchase loan and four refinance loans to low-income borrowers. The percentage of loan originations for home purchase was 3%; and for home refinance it was 10%. In comparison, 7% of the population in the assessment area is low income. Since the bank is not in an MSA, no market share data is available.

Distribution of consumer loans to low-income individuals compares very favorably to demographics. Loans to low-income borrowers represent 40% for motor vehicle loans, 6% for home equity, and 23% for other consumer loans. As noted above, 7% of the population in the assessment area is low income.

Data indicates very good efforts to serve the credit needs of moderate-income borrowers. The percentage of loan originations to moderate-income borrowers for home purchase was 16%; and for home refinance 12%. The percentages of motor vehicle loans, home equity loans, and other consumer loans to moderate-income borrowers were 15%, 17%, and 15%, respectively. In comparison, demographic data indicates 8% of the population is moderate income.

FBS's lending to small businesses is reasonable. An analysis of small business loans by loan size indicates that FBS makes a significant number of business loans in small dollar amounts. As indicated in the table below, a substantial majority of the loans (87%) are for amounts of \$100,000 or less, and only 4% are for loans over \$250,000. To the extent that loan size is an indicator of the size of the business, the bank's efforts to extend small business loans are good.

| DISTRIBUTION OF SMALL BUSINESS LOAN ORIGINATIONS IN 1996 and YTD 1997 BY LOAN SIZE | | | | | |
|---|----------------|----------------------------|----------------|------------------------------|----------------|
| Less than \$100,000 | | \$100,001-\$250,000 | | \$250,001-\$1,000,000 | |
| # | \$(000) | # | \$(000) | # | \$(000) |
| 121 | 3,315 | 12 | 1,834 | 6 | 2,149 |

Source: Bank-prepared Small Business Loan Data Collection Register.

Community Development Lending

During the review period, the bank did not originate any loans which qualify as community development loans. Community development loans are those which meet the definition of community development lending, as contained in the CRA regulation, and that have not been considered in the review of small business, small farm, home mortgage, or consumer loans.

Product Innovation and Flexibility

FBS offers some flexible, but not innovative, loan products to serve the home mortgage credit needs of its assessment area. The bank offers home purchase loans with flexible underwriting guidelines, including a lower down payment and discounted loan fees. Two of these products, which are intended to help meet the home purchase needs of low- and moderate-income individuals, are the “Affordable Housing Program” and the “Super Affordable Housing Program.” However, we are unable to determine if low- and moderate-income families were the primary beneficiaries. For a majority of the review period (up to May 1997), the bank’s income guideline allowed individuals with up to 100% of the HUD estimated median family income to qualify for home mortgage loans under these programs. This is not consistent with the income level categories for low- and moderate-income families as defined in the CRA regulation.

INVESTMENT TEST

To assess FirstBank of Silverthorne N.A.’s performance under the Investment Test, we reviewed its investment and grant activity; responsiveness to credit and community development needs; and its initiatives with community development.

Conclusions:

FBS’s investment performance within its assessment area is rated as “Low Satisfactory.” This rating is based on the following:

- ▶ FBS holds a community development investment totaling \$220,000 which was purchased in 1993. This bond helped build a multifamily, low-income housing project in Silverthorne.
- ▶ FBS contributed grants totaling \$8,206 to organizations whose primary purpose is community development during the review period.

| INVESTMENT TEST: FBS Assessment Area | | | | | |
|---|------------------|----------------|----------------|------------------|-----------------------------------|
| Investment Type | Equity | Deposit | Grant | Total | # of Housing Units or Jobs |
| Affordable Housing | \$220,000 | 0 | 0 | \$220,000 | 61 housing units |
| Economic Development | 0 | 0 | 0 | 0 | |
| Other | 0 | 0 | \$8,206 | \$ 8,206 | Not available |
| Total | \$220,000 | 0 | \$8,206 | \$228,206 | |

Source: Bank-prepared records for investments and grants.

Qualifying investments can include but are not limited to investments, grants, or depositor shares that have community development, as defined in the CRA regulation, as their primary purpose. The bank rarely assumes a leadership role in this area but exhibits a good responsiveness to community development needs when opportunities are available. Affordable housing has been a significant need in the bank’s assessment area for a long time. FBS continues to help meet that

need by carrying in its investment portfolio a Colorado Affordable Catholic Housing Bond for \$220,000. This bond helped finance construction of a multifamily, low-income housing project in Silverthorne.

The bank made seven grants totaling \$8,206 to organizations that have community development, as defined in the CRA regulation, as their primary purpose. One grant helps assist low- and moderate-income home buyers. Another helps support a small business development program. The balance of the grants will help support organizations which assist low- and moderate-income individuals.

SERVICE TEST

In evaluating FirstBank of Silverthorne N.A.'s performance under the Service Test, we focused on the accessibility of its delivery systems; changes in branch locations; reasonableness of its business hours and services in meeting the needs of its assessment areas; and level of community development services.

Conclusions:

FBS's performance under the Service Test is rated "Low Satisfactory." This rating is based on the following:

- ▶ Delivery systems are reasonably accessible to all portions of the assessment area.
- ▶ The bank has not opened or closed any branches since the last CRA examination.
- ▶ FBS provided 11 hours of community development services within its assessment area.

Retail Banking Services

FBS has one staffed office, a full-service ATM, and a limited-service ATM. All are located in Silverthorne. However, these adequately serve the five BNAs in the bank's assessment area. The bank is centrally located and most residents of the assessment area commute to either Silverthorne or Breckenridge to work and do their banking and shopping.

In an effort to reach more individuals within the assessment area, the bank uses the following alternative delivery systems. However, management was not able to provide information about how effective these delivery systems are in reaching low- and moderate-income persons.

- ▶ **Loans By Phone** - This is a 24-hour system which allows individuals to apply for most types of consumer and mortgage loans by phone. The applicant is informed of a loan decision within 24 hours. By calling the same telephone number, an individual can also apply for a new checking or savings account. Applicants that are approved for loans or new accounts are referred to the nearest branch for loan closing or account set-up.

- ▶ **Business PC Banking** - This system is designed to allow businesses access to electronic banking through a personal computer. Services include funds transfer, account reconciliation, and tax payment filing.
- ▶ **FirstBank Web Site** - The web site at www.1stbank.com provides customers with product information, bank locations and hours, and telephone numbers. Customers can also apply for a consumer loan.

The bank also offers a service to small business owners called the “Simplified Employee Pension Account.” This service provides a simplified way for employers to establish a retirement plan for their employees by using Individual Retirement Accounts.

FBS’s business hours, products, and services are reasonable. The bank offers a wide array of products and services. FBS is open Monday through Thursday from 9:00 a.m. to 5:00 p.m., Friday from 9:00 a.m. to 6:00 p.m., and Saturday from 9:00 a.m. to noon. The drive-up facility is open Monday through Friday from 8:00 a.m. to 6:00 p.m. and Saturday from 9:00 a.m. to noon.

Community Development Services

The level of community development services is adequate considering the size of the staff and the size of the bank. Bank employees provided a total of 11 hours to 3 organizations or groups whose primary purpose is community development.

Examples of community development groups to whom the bank’s employees donated time are: Habitat for Humanity and Colorado Mountain College - Small Business Workshops.

Other ongoing community development services offered by the bank are:

- ▶ **Free Government Check Cashing** - The bank will cash all forms of federal, state, and local government checks free of charge for both customers and non-customers.
- ▶ **Free Non-Profit Accounts** - The bank provides free checking accounts for Colorado non-profit organizations.

Fair Lending Review

A fair lending examination was conducted in November 1996. The examination evaluated the uniform HMDA loan underwriting practices of the national bank subsidiaries of FirstBank Holding Company of Colorado. Lending policies and procedures were reviewed. And a comparative file analysis was done on a sample of 100 home improvement loans to white applicants and 12 denied applications for home improvement loans from minority applicants to test for illegal discrimination on the basis of race. No violations of the substantive provisions of the anti-discriminatory laws and regulations were identified. The holding company's compliance program requires fair lending training for appropriate bank personnel, and the company's audit department performs fair lending reviews of the subsidiary banks.

Appendix A: Scope of Examination

| Time Period Reviewed | | | | | | |
|---|--|---|-----------------------|---------|------|------|
| Lending Date: January 1, 1996 - June 30, 1997 | | | | | | |
| Other Performance Criteria: January 1, 1996 - January 6, 1998 | | | | | | |
| Financial Institution | Products Reviewed | | | | | |
| FirstBank of Silverthorne, N.A. | Loans: Consumer, Home Improvement, Residential Mortgage, Small Business, and Community Development. Other: Qualified Investments, Product Delivery Systems, and Community Development Services. | | | | | |
| Affiliate | Products Reviewed | | | | | |
| None. | None. | | | | | |
| List of Assessment Areas and Type of Examination | | | | | | |
| Assessment Areas | Type of Exam | Deposits Attributed to Area Branches as of June 30, 1997 | | | | |
| Summit County (Non-MSA) | On-site | <table style="width: 100%; border: none;"> <tr> <td style="text-align: center;">Dollars (in millions)</td> <td style="text-align: center;">Percent</td> </tr> <tr> <td style="text-align: center;">\$60</td> <td style="text-align: center;">100%</td> </tr> </table> | Dollars (in millions) | Percent | \$60 | 100% |
| Dollars (in millions) | Percent | | | | | |
| \$60 | 100% | | | | | |