



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**First National Bank
Charter Number: 3496**

**201 North Dewey
North Platte, NE 69103**

Office of the Comptroller of the Currency

**Central District
One Financial Place
440 South LaSalle Street, Suite 2700
Chicago, Illinois 60605-1073**

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 **Outstanding**.

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

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

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

The major factors that support this rating include:

- Lending levels reflected an excellent responsiveness by FNB to the credit needs of the bank’s assessment area (AA).
- The geographic distribution of FNB’s reported loans reflected good penetration throughout AA geographies.
- The bank achieved an excellent dispersion of loans among borrowers of different income levels and businesses and farms of different sizes.
- The bank provided an excellent volume of community development (CD) loans. Qualified CD loans totaled \$2.2 million.
- FNB’s volume of qualified investments was excellent. During the evaluation period, FNB made \$947,000 in qualified investments.
- The bank’s service delivery systems were readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of the bank’s branches located in moderate-income census tracts was nearly three times the percentage of the population in the AA that resided in moderate-income areas.
- FNB was a leader in providing CD services in its AA.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

First National Bank (FNB) is a full-service financial institution headquartered in North Platte, Nebraska. FNB offers a full range of credit products within its AA including real estate, agricultural, commercial, and consumer loans.

For purposes of CRA evaluation, FNB is an intrastate bank with offices located in Nebraska only. As of February 4, 2002, the bank's main office and two branches were located in North Platte, in west-central Nebraska. The bank had four additional branches located in the western Nebraska communities of Alliance, Chadron, Gering, and Scottsbluff. None of the offices were located in a Metropolitan Statistical Area (MSA). The bank had 17 automated teller machines (ATMs) disbursed throughout the assessment area. The bank had no subsidiaries and no merger or acquisition activities during the evaluation period.

First National of Nebraska, Inc. (FNNI) owns 99.6 percent of the bank stock. FNNI is a \$10 billion multibank holding company headquartered in Omaha, Nebraska. In addition to FNB, FNNI owns nine national banks and two state-chartered banks located primarily in Nebraska and adjacent states in the Midwest.

As of December 31, 2001, FNB had \$475 million in total assets and Tier 1 capital of \$33 million. The bank's loan-to-deposit ratio on that date was 85 percent and net loans represented 76 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 16 percent agricultural (including agricultural real estate); 14 percent commercial (including commercial real estate); 9 percent consumer; 7 percent residential real estate; 2 percent other real estate; and 7 percent other. The remaining 45 percent of the bank's portfolio was comprised of credit card participations purchased from an affiliate bank. FNB sold a significant volume of its home purchase and refinance mortgage loans on the secondary market. The loan-to-deposit ratio and loan portfolio mix do not reflect these loans. During 1999, 2000, and 2001, the bank originated and sold 457 residential mortgage loans totaling \$34 million. There were no known legal, financial, or other impediments that hampered FNB's ability to help meet the credit needs of its AA.

The bank previously attained a "Satisfactory" rating at the last CRA examination dated February 1, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for home mortgage loans, small loans to businesses, and small loans to farms was from January 1, 1999 to December 31, 2001. The evaluation period for community development loans, the investment test, and the service test was from February 1, 1999 to February 4, 2002.

While credit card loan participations comprised the largest portion of the bank's loan portfolio, we did not include these loans in the analysis of borrower and geographic distribution of loans. The participations represented a loan product offered nationwide by an affiliate bank. As a result, the vast majority of credit card borrowers were outside FNB's AA. When analyzing lending activity, we took

into consideration whether credit card loan participations were purchased to the detriment of borrowers within the AA.

Data Integrity

We tested the accuracy of the bank's publicly filed information for small loans to businesses and farms as part of the CRA evaluation. We found the level of accuracy of the collected data to be satisfactory.

The bank was not required to collect and report data on home mortgage loans under the Home Mortgage Disclosure Act (HMDA). FNB did collect and maintain some data on home mortgage loans internally. We tested the accuracy of this data to determine whether we could use it for CRA analysis. We found errors in the data regarding loan purpose and geocoding. Management implemented new procedures to ensure accurate data collection. For this examination, we used random samples of home purchase, home improvement, and home mortgage refinance loans to evaluate the bank's lending performance.

We also reviewed CD loans, investments, and services submitted by FNB to ensure they met the regulatory definition for CD. We excluded from this evaluation a few items submitted for consideration because they did not meet the definition or purpose of CD.

Selection of Areas for Full-Scope Review

FNB has only one AA. We performed a full-scope review of this area. Refer to the table in appendix A for more information.

Ratings

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

In determining conclusions for the lending test, we weighted loan products to be reflective of FNB's loan volume by product type during the evaluation period. The five loan products we evaluated were small loans to businesses, small loans to farms, home purchase loans, home improvement loans, and home mortgage refinance loans. We weighted small loans to farms and small loans to businesses more heavily than other reported loan products as they represented 36 percent and 26 percent of the total number of originated loans during the evaluation period. Home purchase and home mortgage refinance loans combined represented 27 percent of the total volume of loans. Home improvement and home equity loans combined represented 11 percent of the total loan volume.

The CRA regulation also gives consideration to a bank's multi-family mortgage lending. We did not include multifamily lending in our analysis as FNB's loan volume for this product was insignificant. As of December 31, 2001, multifamily mortgage loans represented less than 1 percent of the bank's total loans.

Other

We performed two community contacts during the examination and reviewed nine contacts completed in the AA since the last CRA examination. Organizations contacted included government officials, economic development organizations, housing organizations, and trade associations. The organizations focused on affordable housing for low- and moderate-income (LMI) individuals, community and economic development, and local business development and expansion.

The contacts stated the primary needs in the AA related to affordable housing for LMI families. Contacts noted median housing values rose significantly since the 1990 census and there was a shortage of homes in the AA that were affordable to LMI. Also, there was a continuing need for flexible mortgage loan programs targeted to LMI, including low down payment requirements and closing cost assistance. To a lesser extent, contacts noted a need for rehabilitation loans for older homes and capital to finance new businesses and the expansion of existing businesses. We considered these needs in our evaluation of the bank'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 the most recent public comments, consumer complaint information, small business lending data and small farm lending 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 in 1999.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Area Receiving a Full-Scope Review

The bank's performance under the lending test is rated "Outstanding." This is based on a full-scope review of the bank's AA.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity. Table 1 Other Products was removed from appendix C as the bank chose not to provide option data on other loan products.

FNB's lending activity in the AA was excellent. The bank's volume of small loans to farms and loans to purchase or refinance residential real estate were the primary factors supporting this conclusion.

To analyze FNB's lending activity, we compared the bank's deposit market share with its lending market share for small loans to farms and businesses. In comparing the market share percentages, we took into consideration that deposit market share information included only deposit-taking financial institutions that had one or more branches located in the AA. Lending market share information included lenders who did not have deposit-taking facilities in FNB's AA, but reported one or more business or farm loan in the area in 2000. Deposit market share data included all deposit-taking financial institutions regardless of their size. Lending market share data included primarily larger banks. CRA reporting requirements for business and farm loans are limited to banks with total assets exceeding \$250 million or more, or banks of any size that were part of a holding company with total assets of \$1 billion or more. Due to the different populations of financial institutions included in the data, we did

not expect FNB's deposit market share and lending market share percentages to match in order for performance to be considered good.

Based on FDIC deposit market share data as of June 30, 2001, there were 24 deposit-taking financial institutions with one or more banking offices in the bank's AA. FNB was the largest of these institutions with a 24 percent deposit market share.

The bank's volume of small loans to farms was excellent. There were 18 lenders reporting one or more small farm loans in the AA in 2000. FNB ranked second among these lenders with a 30 percent market share.

FNB's volume of small loans to businesses was good. There were over 40 lenders reporting one or more small business loans in the AA in 2000. FNB ranked first among these lenders with an 18 percent market share.

Similar comparisons were difficult to make for home mortgage loans because comprehensive market share data is not readily available in nonmetropolitan areas. Also, FNB was not required to collect and report data on home mortgage loans under the Home Mortgage Disclosure Act (HMDA). To analyze home mortgage lending volume, we compared bank-generated reports on home mortgage loan volume to aggregate HMDA data from the bank's AA for 2000.

Bank reports showed FNB originated an excellent volume of first purchase and home mortgage refinance loans within its AA. For 2000, FNB originated 277 loans to purchase or refinance the purchase of a residential dwelling. Bank reports did not separate first purchase from refinance loans. In comparison, aggregate HMDA data for 2000 showed the highest volume of first purchase or refinance loans originated by a financial institution within FNB's AA was 84 loans. Competition for these loans was very strong as HMDA data noted over 100 lenders reporting one or more first purchase or refinance loan in 2000.

The bank originated a good volume of home improvement loans within its AA. Bank reports showed FNB originated 145 home improvement or home equity loans in its AA in 2000. Bank reports did not separate home improvement loans from home equity loans. Examiners sampled the data and determined 46 percent of the sampled loans were for home improvement. For 2000, this equaled approximately 67 home improvement loans originated by FNB within its AA. The bank's estimated volume of home improvement loans compared favorably to aggregate HMDA data. For 2000, HMDA data showed the two highest volumes of home improvement loans originated by financial institutions within the FNB AA were 68 loans and 50 loans respectively. Aggregate data showed 14 lenders reporting one or more home improvement loan in the FNB AA in 2000.

FNB addressed local credit needs before purchasing credit card participations. It is FNNI policy for all affiliate banks to first help meet credit needs of their local AAs. Then, FNNI will make available credit card participations for affiliate banks to purchase with their excess liquidity. During this CRA evaluation, FNB demonstrated their commitment to AA lending needs as loan volume other than credit cards grew \$41 million (an increase of 28 percent). Meanwhile, the bank's volume of credit card participations decreased from \$183 million to \$163 million (a decrease of 11 percent).

Distribution of Loans by Income Level of the Geography

The geographic distribution of FNB's reported loans reflected good penetration throughout the AA. Performance was good or excellent for all loan products reviewed except home mortgage refinance loans. We identified no conspicuous gaps in the geographic distribution of loans. FNB originated a high percentage of its reported loans within its AA.

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 bank achieved a good geographic distribution of home purchase and home improvement loans throughout the AA. For both loan products, the bank's percentage of loans in moderate-income geographies was near to the percentage of owner-occupied housing units that were within those areas.

The bank's geographic distribution of home mortgage refinance loans was poor. FNB's percentage of these loans in moderate-income geographies (2 percent) was considerably below the percentage of owner-occupied housing units that were within those geographies (8 percent). The bank's performance was also not consistent with competing lenders. Aggregate HMDA data showed that for all home mortgage refinancing loans reported in FNB's AA in 2000, approximately 8 percent were in moderate-income geographies. Management was unable to provide an explanation for the bank's low penetration of home mortgage refinance loans in moderate-income geographies.

The weaker geographic distribution of home mortgage refinance loans did not have a significant adverse impact on the bank's performance as these loans represented only about 12 percent of total loans during the evaluation period. As previously noted, bank reports did not separate first purchase loans from refinance loans. Examiners sampled the data and determined 45 percent of the sampled loans were for home mortgage refinance. For the evaluation period, this equaled approximately 504 loans originated by FNB within its AA. This in turn represented 12 percent of total loans listed in Table 1 in appendix C.

A geographic analysis of multifamily loans was not meaningful because the bank originated a minimal number of these loans. Table 5 Geographic Distribution of Multifamily Loans was removed from appendix C.

Small Loans to Businesses

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

FNB's geographic distribution of small loans to businesses in the AA was good. The bank's percentage of loans made in moderate-income geographies was somewhat below the percentage of businesses in the AA that were located in those geographies. In concluding performance was good, we took into consideration the fact that 19 percent of the businesses in moderate-income geographies were in communities that ranged from approximately 30 to 80 miles from the nearest FNB branch. Market share performance was adequate as FNB's market share for small loans to businesses in moderate-income geographies was somewhat below the bank's overall market share for all small loans to businesses throughout the AA. In concluding performance was good, we gave less consideration the bank's

market share performance as the data was incomplete. The majority of banks competing in FNB's AA were not required to collect and report data on small loans to businesses.

Small Loans to Farms

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

The bank's distribution of small loans to farms by geography income level was excellent. FNB's percentage of small loans to farms in moderate-income BNAs met the percentage of farms in the AA that were located in those geographies. Market share performance was good as the bank's market share for small loans to farms in moderate-income geographies substantially met the bank's overall market share for small loans to farms in the AA. In concluding performance was excellent, we gave less consideration to the bank's market share performance as the data was incomplete. The majority of bank's competing in FNB's AA were not required to collect and report data on small loans to farms.

Lending Gap Analysis

We reviewed maps and reports of FNB's home mortgage loans, small loans to businesses, and small loans to farms in the AA to identify gaps in the geographic distribution of these loans. We did not identify any conspicuous gaps in lending. During the evaluation period, FNB originated one or more home mortgage, small business, or small farm loan in every census tract in the AA.

Inside/Outside Ratio

A high percentage of the FNB's reported loans were within its AA. By number of reported loans, the bank originated 89 percent of home purchase loans, 97 percent of home improvement loans, 95 percent of home mortgage refinance loans, 90 percent of small loans to businesses, and 70 percent of small loans to farms within the its AA. For all loan products combined, FNB originated 78 percent of the number of reported loans within the AA.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income level was excellent. Performance was excellent for small loans to farms and home purchase loans and was considered good for small loans to businesses.

When evaluating the borrower distribution of the bank's home mortgage lending throughout the AA, we took into consideration the significant percentage of families throughout the AA living below the poverty level. According to the 1990 U.S. Census, 11 percent of families in FNB's AA were below the poverty level and had less than \$8,300 per year in annual income. These families would have a more difficult time qualifying for residential mortgage loans due to their limited income. Also, rising housing costs made it difficult for low-income families to afford a home. The 1990 median housing value for the AA was \$39,203. Updated published data showed this number increased significantly throughout the AA. For example, the average price of single-family homes sold in North Platte in 2000 was \$81,141 while the average cost of a three-bedroom home in Scottsbluff in 1998 was \$64,637.

Home Mortgage Loans

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

The distribution of FNB's home purchase loans by borrower income level was excellent. Performance was especially strong for lending to moderate-income borrowers. FNB's percentage of home purchase loans to moderate-income borrowers was 1.5 times the percentage of families in the AA that were moderate-income. The bank's percentage of home purchase loans to low-income borrowers was slightly below the percentage of families in the AA that were low-income.

FNB achieved an adequate distribution of home improvement and home mortgage refinance loans to borrowers of different income levels. For both products, the percentage of the bank's loans to LMI borrowers was below the percentage of families in the AA that were LMI. Performance was considered adequate given the significant percentage of families in the AA that were below poverty level and the rising cost of housing.

Small Loans to Businesses

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

The bank's distribution of loans to businesses of different sizes was good. FNB's percentage of reported loans to businesses with gross annual revenues of \$1 million or less was somewhat below the percentage of businesses in the AA with revenues of \$1 million or less. Performance was stronger when looking at market share data. FNB's market share of loans to businesses with revenues of \$1 million or less was 22 percent. This exceeded the bank's overall market share of small loans to businesses, which was 18 percent.

Another indication of the bank's good performance was the percentage of loans originated in amounts of \$100,000 or less. Loan size often loosely correlates to the size of the business. During the evaluation period, FNB originated 87 percent of its reported loans to businesses in amounts of \$100,000 or less, regardless of the size of the business.

Small Loans to Farms

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

FNB's distribution of loans to farms of different sizes was excellent. The bank's percentage of reported loans to farms with gross annual revenues of \$1 million or less exceeded the percentage of farms in the AA with revenues of \$1 million or less. Market share performance was also excellent. FNB's market share of loans to farms with revenues of \$1 million or less was 32 percent. This exceeded the bank's overall market share of small loans to farms, which was 30 percent.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

CD lending had a positive impact on lending test conclusions. This was based primarily on the bank's excellent volume of CD loans originated throughout the AA. FNB originated 10 CD loans totaling \$2.2 million during the evaluation period. This dollar volume represented 7 percent of Tier 1 capital. We considered a few of the loans complex, primarily due to the involvement of various funding sources and partnerships with government entities, private developers, and other financial institutions. The loans were responsive to community needs as 77 percent of the total dollar amount of CD loans provided financing for affordable housing targeted to LMI and for small businesses. The following summarizes some of the bank's qualified CD loans:

- \$754,000 to a developer of affordable housing for the LMI. The funds were used to refinance a loan to construct a 26-unit apartment complex for LMI elderly.
- \$450,000 to a nonprofit economic development agency serving Scotts Bluff County. The funds represented the bank's participation in a \$2.5 million loan that the economic development agency used to construct a building in order to bring a new company to the county. The company helped stabilize and revitalize a moderate-income area by creating almost 400 new jobs, all of which went to LMI persons. Bank data indicated 70 percent of those hired had been unemployed. Other funding sources included community development block grant funds from the Nebraska Department of Economic Development, proceeds from bonds issued by the cities of Scottsbluff and Gering, and private/corporate contributions.
- \$60,000 to a nonprofit provider of services targeted to LMI in the North Platte area. Services provided included job training, emergency assistance, and day care. Loan proceeds were used for operating expenses.

Product Innovation and Flexibility

During the evaluation period, FNB participated in several flexible lending programs to help meet the credit needs of LMI borrowers in the AA. The bank's participation in these programs received positive consideration in the analysis of lending test performance.

FNB actively participated in several housing loan programs sponsored by the federal government that primarily serve LMI applicants. These loan programs generally had reduced down payment requirements, lower interest rates, and more liberal underwriting criteria than conventional loans. During 1999, 2000 and 2001, the bank originated 70 loans totaling \$4 million under the Federal Housing Authority (FHA) loan programs, 40 loans totaling \$3 million under Veteran's Administration (VA) loan programs, and 24 loans totaling over \$1 million under the U.S. Department of Agriculture's Rural Development loan program.

The bank also participated in loan programs offered through the Nebraska Investment Finance Authority (NIFA). NIFA's loan programs provided financing to qualified LMI borrowers throughout Nebraska.

The programs included reduced interest rates and lower down payment requirements than traditional mortgage loan programs. During 1999, 2000, and 2001, FNB originated 63 NIFA loans totaling \$3 million.

FNB was the only financial institution in western Nebraska participating in the First Down Nebraska loan program. This was an affordable housing grant program offered through the Federal Home Loan Bank of Topeka. The program was targeted to LMI borrowers and included grants of up to \$3,300 per loan to cover closing costs, down payment assistance, and homebuyer education programs. Through an affiliate bank in Omaha, FNB originated 25 loans in its AA under this program totaling over \$1 million. Grant assistance to the 25 borrowers totaled over \$70,000.

INVESTMENT TEST

Conclusions for Area Receiving a Full-Scope Review

The bank's performance under the investment test is rated "Outstanding." This is based on a full-scope review of the bank's AA.

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

The bank's performance under the investment test was excellent. During the evaluation period, FNB made \$972,000 in qualified investments. The bank took the initiative to help create investment opportunities in the AA when none were available to purchase on the market. The bank's investments were responsive to identified needs in the AA. FNB's CRA investment strategy focused on investing in opportunities that were sure to benefit the bank's AA, as opposed to investing in statewide investments that had a relatively low potential for direct benefit to the bank's market.

The bank's volume of qualified investments was excellent given the very limited level of CD opportunities in the AA. Discussions with community contacts and a review of CRA performance evaluations of competing banks did not identify any CD investment securities directly benefiting FNB's AA that would have been available for purchase during the evaluation period. In addition, opportunities at the statewide or regional level were primarily limited to low-income housing tax credits, with no guarantee that the investments would benefit the bank's AA. Refer to the market profile in appendix B for further information on the limited investment opportunities in the AA.

FNB's qualified investments included an equity investment of \$770,000 in a community development corporation (CDC) subsidiary of an affiliate bank. The CDC was formed to provide financing for projects to benefit LMI persons, LMI areas, and areas targeted for redevelopment by a government entity. The opportunity for FNB to invest in the CDC became available to the bank only a few months ago and FNB invested shortly thereafter. FNB chose to invest in the CDC because the bank will have an active role in identifying and pursuing local CD projects based upon bank management's expertise and knowledge of AA needs. In addition, the CDC intends to reinvest all of the bank's money in qualified projects that would directly benefit the bank's AA. Due to the short time of FNB's investment, the CDC has not had the opportunity to invest in projects benefiting FNB's AA.

In concluding on the bank's investment test rating, we took into consideration the bank's decision to invest in a regional CDC that would directly benefit FNB's AA, as opposed to investing in statewide tax credits that did not necessarily provide a direct benefit to the bank's AA. We also took into consideration the fact that the bank would have an active role in identifying and pursuing local CD projects for the CDC.

FNB demonstrated a good responsiveness to identified needs in the AA. Qualified CD organizations receiving contributions from the bank provided a variety of services to the community. These included nonprofit developers of affordable housing for LMI, organizations promoting economic development by assisting small businesses, and entities providing various services to LMI, including emergency shelter, food, education, job training, day care, and medical assistance.

SERVICE TEST

Conclusions for Area Receiving a Full-Scope Review

The bank's performance under the Service Test is rated "Outstanding". This is based on a full-scope review of the bank's AA.

Retail Banking Services

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

FNB's service delivery systems were readily accessible to geographies and individuals of different income levels throughout its AA. The percentage of the bank's branches that were located in moderate-income geographies was nearly three times the percentage of the population in the AA that resided in moderate-income areas. The bank maintained an office in each county in the AA with a population exceeding 5,500. The bank did not open or close any branches during the evaluation period.

The bank's hours and services offered throughout the AA were good. Hours and services did not vary in a way that inconvenienced its AA, in particular moderate-income geographies or LMI individuals. FNB supplemented its banking hours and services offered Monday through Friday with Saturday hours at all branches except the Gering branch (located in a middle-income tract). Office hours and services, including the availability of loan officers for all loan products, were comparable among locations with one exception. Two branches in North Platte did not have lending personnel onsite. Loan officers were available by appointment. One of the branches was located in a moderate-income geography while the other was located in an upper-income tract.

The bank's ATM network offered an effective alternative system for delivering retail banking services in moderate-income geographies and to LMI individuals. FNB operated 17 ATMs throughout the AA. By geography income level, 18 percent of the ATMs were in moderate-income tracts, 68 percent were in middle-income tracts, and 22 percent were in upper-income tracts. The percentage of bank ATMs in moderate-income tracts was nearly twice the percentage of the population in the AA that resided in moderate-income areas. Refer to Table 15 in appendix C for the distribution of population by geography income level.

FNB also offered other alternative delivery systems. These included banking by telephone, Internet, and mail services. Banking by telephone services were available in English or Spanish 24 hours per day via a toll-free phone number. The service allowed customers to access checking and savings balances, transfer funds, and obtain loan information. Internet banking allowed customers to access account balances, transfer funds, download account transaction information, and pay bills. No information was available on the effectiveness of these services in reaching moderate-income geographies or LMI individuals. We did not place significant weight on these systems when drawing conclusions under the service test.

Community Development Services

FNB was a leader in providing CD services. This was based on the number of organizations to which FNB provided CD services, the responsiveness of the services to the needs of the community, and the leadership roles bank representatives assumed with these organizations. In total, bank personnel provided services to almost 20 organizations serving the AA. Organizations assisted were involved in a variety of CD activities including affordable housing, community services targeted to LMI individuals, and economic development activities targeted to small businesses. Bank representatives often provided significant leadership to these organizations. They also served as executive officers, board members, and members of finance, executive, and loan review committees. In these roles, FNB employees provided vital services including participating in planning, budgeting, fundraising, loan review, and other managerial and administrative decisions.

The following are examples of community development services FNB representatives provided in the AA during the evaluation period:

- Several bank employees served in leadership roles for two local chapters of the Habitat for Humanity. In the Scottsbluff market, bank employees were instrumental in helping to establish the local Habitat chapter by steering committee that brought the organization to town. On an ongoing basis, employees provided leadership to these organizations by serving as directors and executive officers of the organizations. They also served on resource development, fund raising, and family selection committees. In these roles, bank employees assisted in selecting families for housing projects and guided the families through the home loan application and approval process.
- FNB employees provided significant leadership to a nonprofit organization that provided community services targeted to LMI individuals and families. Services provided by the organization included operating the only 24-hour homeless shelter in western Nebraska. Bank employees provided leadership to the organization by researching financing options to expand the homeless shelter, sponsoring the organization to obtain grant funds through the Federal Home Loan Bank of Topeka, coordinating fund raising events, and providing marketing and accounting advice. FNB personnel also served as directors, executive officers, chair of the finance committee, and members of the program committee.
- FNB officers served as instructors at ongoing seminars for LMI first time homebuyers and entrepreneurial training courses for future small business owners. Topics covered included mortgage loan processing and underwriting procedures, preparing personal financial statements, developing business plans, and analyzing small business credit.

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): 1/1/99 to 12/31/01 Investment and Service Tests and CD Loans: 2/1/99 to 2/4/02	
Financial Institution	Products Reviewed	
First National Bank (FNB) North Platte, NE	Home mortgage loans, small loans to businesses, small loans to farms, community development loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA - No affiliate products reviewed		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
FNB AA	Full-Scope	Rural AA consisting of the following counties in Nebraska: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas

Appendix B: Market Profile for Full-Scope Area

North Platte Assessment Area

Demographic Information for Full-Scope Area: FNB North Platte Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	33	0%	18%	64%	18%	0%
Population by Geography	102,866	0%	10%	68%	22%	0%
Owner-Occupied Housing by Geography	26,346	0%	8%	68%	24%	0%
Businesses by Geography	5,653	0%	14%	66%	20%	0%
Farms by Geography	1,505	0%	12%	68%	20%	0%
Family Distribution by Income Level	28,193	19%	19%	22%	40%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,680	0%	14%	72%	14%	0%
Median Family Income	= \$27,623					
HUD Adjusted Median Family Income for 2001	= \$45,000					
Households Below the Poverty Level	= 14%					
				Median Housing Value	= \$39,203	
				Unemployment Rate	= 4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

FNB designated the following contiguous counties in western Nebraska as its AA: Arthur, Box Butte, Dawes, Garden, Grant, Hooker, Lincoln, Logan, McPherson, Morrill, Scotts Bluff, and Thomas. The bank's head office, six branches, and all deposit-taking ATMs were located within the AA. FNB chose the 12-county area as its AA as this was where the majority of the bank's lending and banking services were available during the evaluation period.

The AA was very large as it contained over 13,000 square miles. This was comparable to the States of Connecticut, Massachusetts, and Rhode Island, combined. FNB's AA was also predominantly rural and very sparsely populated, with an average of less than eight persons per square mile. In counties where FNB did not have a branch facility, the population averaged less than two persons per square mile.

The bank's deposits in the AA totaled approximately \$409 million as of June 30, 2001. Based on FDIC deposit market share as of that date, this ranked FNB as the largest deposit-taking financial institution in the AA with a 24 percent market share. FNB was considerably larger than the second largest deposit-taking financial institution, which had \$168 million in deposits and a 10 percent market share. Five additional financial institutions reported deposits in excess of \$100 million and had market shares ranging from 7 percent to 9 percent.

FNB operated in a competitive environment. According to FDIC deposit market share data, there were 24 deposit-taking financial institutions operating in the bank's AA as of June 30, 2001 with a combined 66 banking offices. Primary financial institution competitors included Platte Valley National Bank in Scottsbluff, Community First National Bank in Alliance and Chadron, Wells Fargo Bank Nebraska, N.A. in Alliance and North Platte, First State Bank in Scottsbluff, Valley Bank and Trust Company in Scottsbluff, U.S. Bank, N.A. in Scottsbluff, and United Nebraska Bank in North Platte. Several mortgage companies provided significant competition for home mortgage loans. Aggregate HMDA data noted over 110 lenders reporting one or more mortgage loan in FNB's AA in 2000. The actual number of lenders making mortgage loans in the AA was considerably higher because rural banks (including FNB) were not required to report mortgage loans and were not included in the HMDA data.

The economy was stable during the evaluation period. Agriculture and related industries dominated the AA; however, there was some employment diversification. Major employers in the AA included Union Pacific Railroad in North Platte, Burlington Northern Railroad in Alliance, and regional medical centers in Scottsbluff and North Platte. The 2000 average unemployment rate for the AA was 4.2 percent. This was comparable to the national average of 4.0 percent. By county within FNB's AA, the 2000 average annual unemployment rate ranged from 1.4 percent in McPherson County to 6.0 percent in Thomas County.

According to community contacts, the primary credit needs in the AA were for flexible mortgage loan programs targeted to LMI persons, including low down payment requirements and closing cost assistance. To a lesser extent, contacts noted a need for rehabilitation loans for older homes and capital to finance new businesses and the expansion of existing businesses.

Several contacts noted a lack of housing stock that was affordable for LMI. Housing costs were reported to have risen significantly in the AA. The 1990 median housing value in the AA was \$39,203. Community contacts showed this number increased to over \$80,000 in North Platte and almost \$65,000 in Scottsbluff.

Limited opportunities existed to facilitate activities to address unmet credit and community development needs in the AA. Contacts noted there were no CD financial institutions or small business investment companies serving the AA. Contacts were unable to identify any qualified investment opportunities available during the evaluation period other than regional or statewide bond issuances, low-income housing tax credits, and contributions to organizations providing CD services within the AA.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME		Geography: Nebraska						Evaluation Period: January 1, 1999 to December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
FNB North Platte AA	100%	1,570	90,001	1,063	69,393	1,492	77,884	10	2,236	4,135	239,514	100%

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is February 1, 1999 to February 4, 2002.

*** Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: Nebraska					Evaluation Period: January 1, 1999 to December 31, 2001									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
FNB North Platte AA	59	100%	NA	NA	8%	7%	68%	58%	24%	36%	NA	NA	NA	NA	NA	

* Based on NA Peer Mortgage Data: NA Region.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Nebraska								Evaluation Period: January 1, 1999 to December 31, 2001					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB North Platte AA	30	100%	NA	NA	8%	7%	68%	83%	24%	10%	NA	NA	NA	NA	NA

* Based on NA Peer Mortgage Data: NA Region.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: Nebraska					Evaluation Period: January 1, 1999 to December 31, 2001				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp					
Full Review:																				
FNB North Platte AA	59	100%	NA	NA	8%	2%	68%	56%	24%	42%	NA	NA	NA	NA	NA					

* Based on NA Peer Mortgage Data: NA Region.

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: Nebraska					Evaluation Period: January 1, 1999 to December 31, 2001				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]										
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
FNB No. Platte AA	1,063	100%	0%	0%	14%	10%	66%	60%	20%	30%	18%	NA	14%	19%	23%						

^{*} Based on 2000 Peer Small Business Data: US.

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

^{***} Source Data - Dun and Bradstreet (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: Nebraska															
Evaluation Period: January 1, 1999 to December 31, 2001															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
FNB North Platte AA	1,492	100%	0%	0%	12%	12%	68%	68%	20%	20%	30%	NA	28%	29%	37%

* Based on 2000 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEBRASKA						Evaluation Period: January 1, 1999 to December 31, 2001							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
FNB North Platte AA	59	100%	19%	16%	19%	29%	22%	22%	40%	33%	NA	NA	NA	NA	NA

* Based on NA Peer Mortgage Data: NA Region.

** As a percentage of loans with borrower income information available. No information was available for 2% of loans originated and purchased by Bank.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: Nebraska				Evaluation Period: January 1, 1999 to December 31, 2001									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]					
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp	
Full Review:																
FNB North Platte AA	30	100%	19%	10%	19%	7%	22%	28%	40%	55%	NA	NA	NA	NA	NA	

^{*} Based on NA Peer Mortgage Data: NA Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Nebraska		Evaluation Period: January 1, 1999 to December 31, 2001				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]							
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp			
Full Review:																		
FNB North Platte AA	59	100%	19%	2%	19%	12%	22%	27%	40%	59%	NA	NA	NA	NA	NA			

^{*} Based on NA Peer Mortgage Data: NA Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Nebraska		Evaluation Period: January 1, 1999 to December 31, 2001		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
FNB North Platte AA	1,063	100%	94%	85%	87%	7%	6%	18%	22%

* Based on 2000 Peer Small Business Data: US.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

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

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
				Geography: Nebraska		Evaluation Period: January 1, 1999 to December 31, 2001			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
FNB North Platte AA	1,492	100%	90%	98%	86%	11%	3%	30%	32%

* Based on 2000 Peer Small Business Data: US.

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Nebraska				Evaluation Period: February 1, 1999 to February 4, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
FNB North Platte AA	0	0	17	972	17	972	100%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nebraska Evaluation Period: February 1, 1999 to February 4, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
FNB North Platte AA	100%	7	7	NA	29%	42%	29%	0	0	NA	NA	NA	NA	NA	10%	68%	22%