



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**August 14, 2006**

# **Community Reinvestment Act Performance Evaluation**

**First National Bank & Trust Company of Columbus  
Charter Number: 8328**

**2623 Thirteenth Street  
Columbus, Nebraska 68601**

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

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## Overall CRA Rating

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

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

<b>Performance Levels</b>	First National Bank & Trust of Columbus Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
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 activity reflected excellent responsiveness by FNB&T to address the credit needs of the bank’s assessment area (AA).
- The geographic distribution of FNB&T’s reported loans shows good penetration throughout the AA.
- FNB&T had good distribution of loans to borrowers of different income levels during the evaluation period.
- FNB&T’s volume of qualified investments was good. The bank made \$461,000 in qualified investments during the evaluation period.
- The bank’s service delivery systems are accessible to geographies and individuals of different income levels throughout the AA.
- FNB&T provided a relatively high level of community development (CD) services in the 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.

**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 householder 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 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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**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.

**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 & Trust Company of Columbus (FNB&T) is a full-service financial institution headquartered in Columbus, Nebraska. The bank offers a full range of credit products within its AA including agricultural, commercial, residential real estate, and consumer loans.

For purposes of the CRA evaluation, FNB&T is an intrastate bank with offices in Nebraska only. The bank is an intermediate small bank that for CRA purposes opted to be examined as a large bank. As of July 7, 2006 the bank had four office locations and 14 automated teller machines (ATMs) in the Columbus/Norfolk AA. None of the offices were located in a Metropolitan Statistical Area (MSA). The bank had no merger or acquisition activities during the evaluation period.

FNB&T is a subsidiary of First National of Nebraska, Inc. (FNNI). FNNI is a \$13 billion multibank holding company headquartered in Omaha, Nebraska. In addition to FNB&T, FNNI owns nine other national banks and two state-chartered banks located in Nebraska and adjacent Midwestern states.

As of March 31, 2006, FNB&T had \$419 million in total assets and Tier One Capital of \$33 million. The bank's loan-to-deposit ratio was 79 percent and net loans represented 70 percent of total assets. By dollar amount, the loan portfolio consisted of 29 percent commercial and commercial real estate loans, 28 percent agricultural and agricultural real estate loans, 11 percent residential real estate loans, 9 percent consumer loans, and 1 percent other loans. The remaining 22 percent of the bank's portfolio was comprised of credit card participations from an affiliate bank. There were no known legal, financial, or other impediments that hampered FNB&T's ability to help meet the credit needs of its AA.

The bank received a "Satisfactory" rating at the last CRA examination dated July 21, 2003.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for home purchase and home mortgage refinance loans, small loans to businesses, and small loans to farms was January 1, 2003 to December 31, 2005. We did not perform an analysis for home improvement or multifamily loans, as the volume for these products during the evaluation period was insignificant at less than 1 percent of the bank's lending activity.

The evaluation period for community development loans, the investment test, and the service test was from January 1, 2003 to December, 31 2005.

Credit card participations comprise a large portion of the bank's loan portfolio; however, we did not include these loans in the borrower and geographic loan distribution analysis. The participations represent a loan product offered nationwide by an affiliate bank. As a result, the vast majority of the credit card borrowers are located outside FNB&T's AA. When analyzing lending activity, we considered whether the bank adequately met the needs of borrowers in the AA prior to acquiring the credit card participations.

### Data Integrity

As a part of the CRA evaluation, we tested the accuracy of the bank's publicly filed information for small loans to businesses and farms, and the bank's voluntarily collected home purchase and home mortgage refinance loan information. We found the level of accuracy to be satisfactory for purposes of our CRA analysis.

We reviewed information on all community development activities (loans, investments, and services) to ensure they met the regulatory definition for CD. Only those activities that met the definition are presented and considered in this evaluation.

### Selection of Areas for Full-Scope Review

FNB&T has only one AA. We performed a full-scope review of the bank's Columbus/Norfolk AA. We included CT 9848, which includes the town of Schuyler, in our analysis of the bank's AA. Refer to 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 FNB&T's small loans to farms and businesses more heavily than home mortgage loan products. Small loans to farms represented approximately one-half of originated loans, and small loans to businesses totaled one-fourth of the originated loans during the evaluation period. The bank has historically focused on agricultural and commercial lending as its primary loan types in the AA. Please refer to Table 1 in appendix C for details.

## Other

We conducted two community contacts from economic development organizations during the examination. These organizations focus on attracting new businesses to the AA and on the growth of existing businesses. The contacts were knowledgeable about the AA's economic conditions, demographic characteristics, and the AA's general banking and credit needs. Community contact representatives cited small business lending, particularly loans to start-up businesses, and housing rehabilitation loans as the primary needs in the AA. Both community contacts indicated FNB&T has provided good support to CD activities in the AA.

## **Fair Lending or Other Illegal Credit Practices Review**

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated "High Satisfactory". This is based on a full-scope review of the Columbus/Norfolk 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.

Lending levels reflect excellent responsiveness to the bank's AA credit needs. The bank's volume of small loans to farms was the primary factor supporting this conclusion.

To analyze the lending activity of FNB&T, we compared the bank's deposit market share with its lending market share for each loan product where information was available. In comparing the market share percentages, we considered the fact that the deposit market share analysis only included deposit-taking financial institutions with one or more offices in the AA. However, the lending market share calculations included lenders who did not have deposit-taking facilities in the AA, as well some non-bank lenders. We did not expect FNB&T's deposit market share and lending market share percentages to be equal in order for performance to be considered good.

Based on FDIC deposit market share data as of June 30, 2005, there were 27 deposit-taking financial institutions with 67 offices in the 5 counties where FNB&T's AA is located. FNB&T was the largest institution with an 18 percent deposit market share.

FNB&T originated the following loan volumes in the AA during the evaluation period:

- 1,886 small loans to farms totaling \$170 million. This represents 27 percent of all reported loans to small farms in the assessment area, ranking the bank second among 16 lenders.
- 1,150 small loans to businesses totaling \$109 million. This represents 14 percent of all reported loans to small businesses in the assessment area, ranking the bank second among 27 lenders.
- 1,017 home purchase and refinance loans totaling \$91 million. Market share data was not available for home mortgage lending since that bank was not a HMDA reporter.

FNB&T 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.

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

The geographic distribution of FNB&T's reported loans reflects good penetration throughout the AA. We identified no conspicuous gaps in the geographic distribution of loans. FNB&T originated a high percentage of its reported loans within its AA.

### ***Home Mortgage Loans***

Refer to Tables 2 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.

FNB&T had a good geographic distribution of home purchase loans and an adequate geographic distribution of home mortgage refinance loans to the moderate-income geography in the AA. For home purchase loans, the bank's percentage of loans in the moderate-income geography is equal to the percentage of owner-occupied homes located in this geography. For home mortgage refinance loans, the bank's percentage of loans in the moderate-income CT was below the percentage of owner-occupied homes located in that CT.

A geographical analysis of home improvement loans and multifamily loans was not meaningful because the bank originated a minimal number of these loans.

### ***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 and purchase of small loans to businesses.

FNB&T's distribution of small loans to businesses by geographic income level was excellent. The bank's percentage of small loans to businesses in the moderate-income CT exceeds the percentage of businesses that were located in this CT. Additionally, market share performance was excellent as FNB&T's market share for small loans to businesses in the moderate-income geography far exceeded the bank's overall market share for all small loans to businesses throughout the AA.

### ***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 and purchase of small loans to farms.

The bank's geographic distribution of small loans to farms in the AA was excellent. The bank's percentage of small loans to farms in the moderate-income geography was 0.4 percent. This slightly trails the percentage of farms in the AA located in the moderate-income CT, which was 0.9 percent. The bank's market share for small loans to farms in the moderate-income geography was significantly higher than the bank's overall market share for small loans to farms.

In concluding the bank's overall distribution of loans by income level of the geography, we gave less consideration to the analysis conducted on the small loans to farms. This is due to

the extremely low number of farms (11 total) located in the only moderate-income CT in the AA.

### ***Lending Gap Analysis***

The geographic distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. There were no conspicuous gaps or under-served geographies in the Columbus/Norfolk AA. During the evaluation period, FNB&T originated at least one home mortgage, small business, or small farm loan in every CT in the AA.

### ***Inside/Outside Ratio***

A high percentage of FNB&T's loans were made inside its AA. For all loan products combined, FNB&T originated 83 percent of the number of reported loans within the AA. By specific loan type, the bank originated 86 percent of home purchase loans, 90 percent of home refinance loans, 88 percent of small loans to businesses, and 78 percent of small loans to farms within the AA. We viewed this as a positive characteristic in our evaluation of lending performance.

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

FNB&T had good distribution of loans to borrowers of different income levels during the evaluation period. Performance was considered good for small loans to farms and home mortgage refinance loans and excellent for small farms, small businesses, and home purchase loans. Small loans to farms accounted for approximately one-half of all of the bank's reported loan originations and purchases; thus, the analysis of the small loans to farms carried the most weight in our overall analysis.

### ***Home Mortgage Loans***

Refer to Tables 8 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&T's home purchase loans by borrower income level was excellent, and the distribution of home mortgage refinance loans was good. The bank's percentage of home purchase loans originated to moderate-income borrowers (26 percent) far exceeds the percentage of moderate-income families in the AA (18 percent). The bank's percentage of home mortgage refinance loans to moderate-income borrowers (13 percent) was below, but close to, the percentage of moderate-income families in the AA (18 percent). While the bank's percentages of home purchase and home mortgage refinance loans to low-income borrowers trail that of the percentage of low-income families in the AA, this is mitigated by the fact that 9.6 percent of families in the AA are below poverty level and would have difficulty qualifying for a residential mortgage loan.

### ***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 and purchase of small loans to businesses.

The bank's distribution of small loans to businesses with different revenues was excellent. FNB&T's percentage of reported loans to businesses with gross annual revenues of \$1 million or less (67 percent) exceeded the percentage of businesses in the AA with revenues of \$1 million or less (59 percent). FNB&T's market share of small loans to businesses with revenues of \$1 million or less was slightly higher than the bank's overall market share of small loans to businesses. Additionally, FNB originated 83 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 and purchase of small loans to businesses.

FNB&T's distribution of small loans to farms with different revenues was good. The bank originated 88 percent of its reported farm loans in the assessment area to entities with gross annual revenues of \$1 million or less. This slightly trails assessment area demographics, in which 94 percent of farms with known revenues have gross annual revenues of \$1 million or less. FNB&T's market share of small loans to businesses with revenues of \$1 million or less was 25 percent. This also slightly trailed the bank's overall market share of small loans to farms, which was 27 percent. The bank, however, made a substantial majority (81 percent) of small loans to businesses in the amounts of \$100,000 or less.

### **Community Development Lending**

FNB&T did not originate or purchase any CD loans during the evaluation period. Therefore, CD lending had a neutral impact on the lending test conclusions.

### **Product Innovation and Flexibility**

FNB&T participated in several flexible lending affordable housing programs during the evaluation period. The bank's participation in these programs received positive consideration in the analysis of lending test performance.

The following summarizes FNB&T's participation in the flexible loan programs during the evaluation period:

- Nebraska Investment Finance Authority (NIFA) – FNB&T made 226 loans totaling \$16 million under the NIFA program. NIFA's loan programs provide financing to qualified LMI borrowers throughout Nebraska. NIFA loans typically have lower interest rates and down payment requirements than traditional loan programs.
- Rural Development Guaranteed Rural Housing 503 Program (RD) – FNB&T made 182 loans totaling \$13.9 million during the evaluation period. RD loans offer 100 percent financing, no borrower closing costs, and monies for the rehabilitation of the property being purchased. FNB&T continues to be a top lender in the USDA's Guaranteed Rural Housing Program.

- Federal Housing Administration (FHA) – FNB&T originated 35 FHA loans totaling \$2.8 million. This housing program primarily serves LMI applicants and offers reduced down payment requirements, lower interest rates, and more liberal underwriting criteria than conventional loans.
- Veterans Administration – FNB&T originated 10 loans under this program totaling \$1.1 million. This is a loan program sponsored by the federal government that offers 100 percent financing and low closing costs.
- Northeast Nebraska Development District, Inc. and NeighborWorks Down Payment Assistance (DPA) Programs – The bank made 28 loans under these programs totaling \$407,000. These programs are offered to assist LMI homebuyers with down payment requirements. The DPA program consists of a second mortgage at zero percent interest and no payment requirements until after the first mortgage is paid in full.
- Rural Development Direct Leverage Guaranteed Program – FNB&T made 2 loans in 2003 totaling \$162,000 under this program. These loans are offered with second mortgages directly from Rural Development, with subsidized payments.
- Federal Home Loan Bank (FHLB) and First Down Nebraska grants – FNB&T made 48 loans totaling \$155,000 during the evaluation period. The total represents loans with direct FHLB grants and the First Down Nebraska program. The grants are forgivable second liens to first time homebuyers for down payments, closing costs, or home rehabilitation costs. First Down Nebraska is a program that was developed by a FNB&T affiliate in which the affiliate is responsible for verifying applicant qualifications and for obtaining grant monies from the FHLB.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated High Satisfactory. This is based on a full-scope review of the Columbus/Norfolk AA.

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

FNB&T's performance under the investment test was good. The bank made \$461,000, or 1.4 percent of Tier One Capital, in qualified investments during the evaluation period. There were limited CD investment opportunities in the AA and the bank exhibited good responsiveness to the credit and community economic development needs of the AA.

Investments include a \$250,000 investment in an equity fund that promotes affordable housing and economic development on a regional basis that includes the bank's AA. Additionally, the bank made \$211,000 in contributions to 23 organizations that provide affordable housing, promote economic development, and provide community services throughout the AA. None of

the bank's investments were considered innovative or complex. FNB&T did not have any qualified investments from the prior evaluation period that remained outstanding.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated High Satisfactory. This is based on a full scope review of the Columbus/Norfolk 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&T's service delivery systems are accessible to geographies and individuals of different income levels throughout the AA. Three of the bank's branches are located in middle-income CTs and the fourth is located in an upper-income CT. The only moderate-income CT is adjacent to the CT in which the Norfolk branch is located. Moreover, only 4 percent of the AA population resides in the moderate-income tract. There were no openings nor closings of any bank branches during the evaluation period.

FNB&T provides good hours and services at all office locations. Hours and services do not vary in a way that inconveniences moderate-income geographies or LMI individuals. All offices are open Monday through Saturday with extended drive-up hours. Three of the four office locations do not have lending personnel onsite for one or more products. The main bank in Columbus does not have residential real estate lenders onsite, the branch location in Columbus does not have commercial lenders onsite, and the branch location in Norfolk does not have residential real estate or commercial lenders onsite. In all instances, customers wanting to apply for these loan products are referred to the other bank location in Columbus or Norfolk. The lack of lenders at these locations did not place undue hardship on potential credit applications because of the close proximity of branches offering that particular product.

FNB&T offers several alternative delivery systems, including a telephone banking service, Internet banking, ATMs, and banking by mail. Telephone and Internet services are available 24 hours per day and allow customers to access account and loan balances, transfer funds, 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&T provides a relatively high level of CD services. This was based on the number of organizations to which FNB&T provided CD services, the responsiveness of the services to the needs of the community, and the leadership roles bank representatives assumed with these organizations. During the evaluation period, 18 bank employees provided services to 17 qualifying CD organizations. Service activities involved organizations that promote affordable

housing, support economic development activities targeted to small businesses, or provide community services to LMI individuals.

Examples of CD services provided by FNB&T representatives include the following:

- One FNB&T Director served on the Board of Directors and one bank employee was President for an affordable housing organization. Additionally, two other bank employees were LMI first-time homebuyer seminar instructors for this organization.
- Numerous bank representatives provided financial expertise to entities primarily involved with economic development in the AA. Activities included membership on councils and committees, and providing assistance to small business owners in developing their business plans.
- Several bank associates provided financial expertise to seven entities that provide community services targeted to LMI individuals and families. During the evaluation period, bank employees served in the roles of executive officers, board members, and members of various committees for these organizations.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered.

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 1/1/03 to 12/31/05 Investment and Service Tests and CD Loans: 1/1/03 to 12/31/05	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank & Trust Co. of Columbus (FNB&T) Columbus, Nebraska	Home Mortgage Loans, Small Loans to Businesses, Small Loans to Farms, and Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
First National Bank of Omaha (FNBO)	Affiliate Bank	Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Columbus/Norfolk AA	Full-Scope	The AA includes 20 census tracts in the following counties in Nebraska: Butler, Colfax, Madison, Platte, and Polk.

## Appendix B: Market Profiles for Full-Scope Areas

### Columbus/Norfolk Assessment Area

Demographic Information for Full-Scope Area: Columbus/Norfolk Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	20	NA	5%	75%	20%	NA
Population by Geography	83,964	NA	4%	68%	28%	NA
Owner-Occupied Housing by Geography	22,421	NA	2%	69%	29%	NA
Businesses by Geography	5,874	NA	5%	74%	22%	NA
Farms by Geography	1,189	NA	1%	88%	11%	NA
Family Distribution by Income Level	21,978	14%	18%	24%	44%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,018	NA	6%	73%	21%	NA
Median Family Income = \$45,936			Median Housing Value = \$76,513			
HUD Adjusted Median Family Income for 2005 = \$49,750			Unemployment Rate ** = 2.9%			
Households Below the Poverty Level = 9.6%						

(\*) The NA category consists of geographies that have not been assigned an income classification.

(\*\*) Nebraska Department of Labor (average for the five counties in the bank's AA for June 2006).

Source: 2000 U.S. Census and 2005 HUD updated MFI.

FNB&T's AA consists of 20 CTs located in the following counties: Butler, Colfax, Madison, Platte, and Polk. This includes CT 9848, the town of Schuyler, which we added to the bank's defined AA. The bank's head office, three branches, and 14 ATMs were located within the AA. The AA consists of 1 moderate-income CT, 15 middle-income CTs, and 4 upper-income CTs. The moderate-income CT was designated as a middle-income CT at the previous CRA examination.

The bank's deposits in the AA totaled approximately \$345 million as of June 30, 2005. Based on FDIC deposit market share information as of that date, this ranked FNB&T as the largest deposit-taking financial institution in the five counties that include FNB&T's AA with an 18 percent market share. The second and third largest deposit-taking institutions hold approximately 9 percent of the market share each.

Competition remains strong among the financial institutions in the market area. There are 27 financial institutions with 67 banking offices in the 5 counties that include the AA. Major competitors include Elkhorn Valley Bank & Trust, Pinnacle Bank, and BankFirst.

The AA economy improved since the prior CRA examination conducted in 2003. Agricultural production and related industries are a dominant influence on the economy. Major employers in the area include BD Medical Supplies, Vishay Electronics, Nebraska Public Power District,

Behlens Manufacturing, Camaco LLC, and Lindsay Manufacturing. The unemployment rate for the bank's AA decreased from 4.7 percent during the last CRA examination to 2.9 percent as of June 2006.

Limited opportunities existed to facilitate activities to address unmet credit and community development needs in the AA. Community contacts did not identify any specific investment securities directly benefiting FNB&T's AA that were available during the evaluation period. Responses from the community contacts indicate that FNB&T has offered good support, including both time and money, in CD projects in the AA.

## Appendix C: Tables of Performance Data

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### 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: (1) 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; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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 assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- 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 assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

**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, 2003 to December 31, 2005				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Columbus/Norfolk AA	100%	1,017	91,093	1,150	108,538	1,886	169,861	0	0	4,075	384,528	100%

\* Loan Data as of December 31, 2005. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is January 1, 2003 to December 31, 2005.

\*\*\* Deposit Data as of June 30, 2005. 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, 2003 to December 31, 2005									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% Owner Occ Units**	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Columbus/Norfolk	468	100%	NA	NA	2%	2%	69%	64%	29%	34%	NA	NA	NA	NA	NA	

\* Market share data is not available since FNB&T is not a HMDA reporter.

\*\* 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 2000 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: Nebraska					Evaluation Period: January 1, 2003 to December 31, 2005				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper					
<b>Full Review:</b>																				
Columbus/Norfolk	549	100%	NA	NA	2%	0%	69%	56%	29%	44%	NA	NA	NA	NA	NA					

\* Market share data is not available since FNB&T is not a HMDA reporter..

\*\* 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 2000 Census information.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: NEBRASKA		Evaluation Period: January 1, 2003 to December 31, 2005		
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	Upper	
<b>Full Review:</b>																
Columbus/Norfolk	1,150	100%	NA	NA	5%	8%	74%	59%	22%	34%	14%	NA	24%	13%	58%	

\* Based on 2005 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 2005.

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

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: Nebraska      Evaluation Period: January 1, 2003 to December 31, 2005															
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	Upper
<b>Full Review:</b>															
Columbus/Norfolk	1,886	100%	NA	NA	0.9%	0.4%	88%	81%	11%	19%	27%	NA	80%	24%	53%

\* Based on 2005 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 2005

## Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: Nebraska				Evaluation Period: January 1, 2003 to December 31, 2005									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upper	
<b>Full Review:</b>																
Columbus/Norfolk	468	100%	14%	6%	18%	26%	24%	28%	44%	40%	NA	NA	NA	NA	NA	

\* Market share data is not available since FNB&T is not a HMDA reporter.

\*\* 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 2000 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 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: Nebraska		Evaluation Period: January 1, 2003 to December 31, 2005				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upper			
<b>Full Review:</b>																		
Columbus/Norfolk	549	100%	14%	5%	18%	13%	24%	21%	44%	61%	NA	NA	NA	NA	NA			

\* Market share data is not available since FNB&T is not a HMDA reporter.

\*\* As a percentage of loans with borrower income information available. No information was available for 4% of loans originated and purchased by Bank.

\*\*\* Percentage of Families is based on the 2000 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, 2003 to December 31, 2005			
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****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Columbus/Norfolk	1,150	100%	59%	67%	83%	10%	7%	14%	15%

\* Based on 2005 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 - 2005).

\*\*\*\* 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 14% 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, 2003 to December 31, 2005		
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
<b>Full Review:</b>									
Columbus/Norfolk	1,886	100%	94%	88%	81%	13%	6%	27%	25%

\* Based on 2005 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 - 2005).

\*\*\*\* 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 4% of small loans to farms originated and purchased by Bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Nebraska				Evaluation Period: January 1, 2003 to December 31, 2005			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Columbus/Norfolk	0	0	22	211	22	211	46%	0	0
Statewide/Regional	0	0	2	250	2	250	54%	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 <span style="float: right;">Evaluation Period: January 1, 2003 to December 31, 2005</span>																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbus/ Norfolk	100%	4	100%	NA	0%	75%	25%	0	0	0	0	0	0	NA	4%	68%	28%