



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

February 9, 2004

Community Reinvestment Act Performance Evaluation

Commerce Bank, National Association
Charter Number: 22705

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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 **Outstanding**.

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

Performance Levels	Commerce Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		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:

- The bank’s distribution of loans among geographies with different income levels is good.
- Commerce Bank’s lending reflects excellent dispersion among borrowers of different income levels and businesses of different sizes.
- The bank’s level of community development lending is significant based on dollar volume, which has a positive impact on the Lending Test.
- The bank’s performance under the investment test is good.
- The bank’s branch distribution reflects excellent dispersion among low- and moderate-income geographies.
- Commerce Bank employees provide an excellent level of community development services.

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 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 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 applicants, 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

Commerce Bank, N.A., Wichita, Kansas (Commerce) is an intrastate institution headquartered in Wichita, Kansas. The bank operates 24 branch offices and 33 ATMs. Commerce serves the entire Wichita, Kansas Metropolitan Area (MA). In addition, Commerce serves the rural communities of Garden City, Hays and Hutchinson Kansas. Commerce has 14 offices in the Wichita, Kansas MA and 11 offices in other communities.

The bank is a wholly owned subsidiary of Commerce Bancshares, Inc. (CBI), headquartered in Kansas City, Missouri, with total assets of \$14.3 billion on December 31, 2003. CBI owns and operates four banks located in Illinois, Missouri, Kansas, and Nebraska. The Nebraska bank is a limited-purpose credit card bank. Also, CBI owns various non-banking entities engaged in activities directly supporting subsidiary banks such as real estate ownership, insurance services, venture capital, and mortgage banking. Commerce Mortgage Company originates the majority of the residential real estate loans for all CBI affiliates. CBI and its subsidiaries combine to provide a wide range of financial products and services for commercial businesses, farming businesses, consumers, and other entities.

As of December 31, 2003, Commerce had \$1.2 billion in total assets and \$494 million in gross loans. By dollar volume, the loan portfolio consists of 42 percent real estate secured, 29 percent consumer, 19 percent commercial, 5 percent agricultural, and 5 percent other loans. Tier 1 capital is \$99 million, which represents 8.24 percent of total assets.

There are no financial, legal or other factors that impede the bank's ability to meet community credit needs.

Commerce received an "Outstanding" rating at its last CRA examination dated September 18, 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed home mortgage, small business, and small farm loans originated from July 1, 2000 to December 31, 2002. We included loans made by Commerce Mortgage Company. The evaluation period for the investment and service tests, and community development loans, is July 1, 2000 through December 31, 2003.

Data Integrity

The OCC performed a review to determine the accuracy of the bank's loan data. The review noted no significant errors and found the bank's data reliable. We evaluated information regarding community development loans, investments, and services during this examination.

Selection of Areas for Full-Scope Review

Commerce has four assessment areas (AAs) in the state of Kansas, which include the Wichita, Kansas MA. We performed a full-scope evaluation on the Wichita AA. The non-MA areas (Garden City, Hays, & Hutchinson) received a limited-scope review. The Wichita AA (Sedgwick & Butler Counties) contains 14 offices and 66 percent of the bank's deposits as of June 30, 2003. The non-MA areas combined have a total of 11 offices and 29 percent of the deposits.

The bank also maintains nine offices located inside the Commerce Bank (Missouri) branches for the purpose of accepting public funds. Kansas state law requires that local public funds be deposited in banks chartered and headquartered in the state of Kansas. The offices are located in the cities of Columbus, Pittsburg, Lawrence, Leavenworth, Independence, Manhattan, Olathe, and Kansas City, Kansas. These locations do not accept retail deposits, originate any loans, or make qualified investments. They account for 5 percent of the bank's deposits. These AAs received a limited-scope review under the service test. However, they were not meaningful to our lending test or investment test analysis since the sole purpose of these branches is to accept public funds.

Refer to the table in Appendix A for additional information on the scope of our review.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. Therefore, more weight was placed on the bank's performance in the Wichita AA.

We gave more weight to small business lending performance since these loans make up a majority of loan originations by both number and dollar volume. After small business loans, home mortgage loans carry the most weight, based on the number of loan originations, followed by small farm loans. Refinanced loans are the primary home mortgage loan product, followed by home purchase loans.

Other

We performed two community contacts with representatives of organizations that provide affordable housing for LMI residents and a firm that provides professional services to small business owners. They indicated that home mortgage loans and small business loans were primary credit needs.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated "Outstanding". Based on a full-scope review, the bank's performance in the Wichita AA is excellent.

Conclusions for Areas Receiving Full-Scope Reviews

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 an adequate responsiveness to the credit needs of the Wichita AA. The bank originated 1,486 loans totaling \$227 million. Small loans to businesses represented 62 percent of these loans, home mortgage loans 25 percent, small loans to farms 12 percent, and community development loans 1 percent.

Commerce ranked third for deposit market share as of June 30, 2003, with 8.63 percent of the AA's deposits. Market share reports for 2002 indicate the bank ranks 10th with 2.42 percent of the small loans to businesses, third with 15.79 percent of the small loans to farms, and 46th with 0.37 percent of all home mortgage loans.

Distribution of Loans by Income Level of the Geography

Geography

The overall geographic distribution of loans by income level of the geography is good. Commerce's geographic distribution of small business loans is good. The distribution of small farm and home mortgage loans is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Commerce's distribution of home mortgage loans is adequate.

The geographic distribution of home purchase loans is adequate. The percentage of the bank's loans in low- and moderate-income (LMI) tracts is below the percentage of owner-occupied housing units in those tracts. However, over 57 percent of the families in the low-income tracts are low-income and 38 percent live at or below the poverty level. Individuals at the poverty level would find it difficult to qualify for home loans.

The geographic distribution of home improvement loans is good. The bank's percentage of loans in low-income tracts exceeds the percentage of owner-occupied units in those tracts. The percentage of loans in moderate-income tracts was below the percentage of owner-

occupied housing units in those tracts. The bank's market share in moderate-income tracts exceeds its overall market share and is below in low-income tracts.

The geographic distribution of home mortgage refinance loans is adequate. The bank's percentage of loans in the low-income tracts compares to the percentage of owner-occupied units, while the bank's lending level is below demographics in the moderate-income tract. The bank's market share in LMI tracts exceeds its overall market share.

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.

The geographic distribution of small loans to businesses is good. The percentage of loans in low-income tracts exceeds the percentage of AA's businesses in those tracts. The percentage of loans in moderate-income tracts was below the percentage of businesses in those tracts. The bank's market share in low-income tracts substantially meets its overall market share and exceeds its overall market share in moderate-income tracts.

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 geographic distribution of small loans to farms is adequate. The bank's lending in low-income tracts is near to the geographic distribution of farms in the tracts. Lending in the moderate-income tracts is lower than the percentage of farms. Market share data indicates the bank did not grant any loans during 2002 in LMI areas.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps, especially in LMI areas, during our geographic distribution analysis. Commerce granted loans in 100 percent of the low-income tracts and 92 percent of the moderate-income tracts.

Inside/Outside Ratio

A majority of the bank's loans were originated in its AAs. Calculated at the bank level, 85 percent of the home mortgages, 87 percent of the small loans to businesses, and 68 percent of the small loans to farms were extended within the AAs.

Distribution of Loans by Income Level of the Borrower

Commerce's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. The bank achieved excellent penetration of lending to businesses with revenues of \$1 million or less, and to LMI borrowers with home mortgage loan products.

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.

Commerce's distribution of home mortgage loans to borrowers of different income levels is excellent.

The distribution of home purchase loans is excellent. The bank's percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. However, the poverty rate is 10 percent for families in the AA, and these individuals would find it difficult to qualify for a home mortgage loan. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. The bank's market share for LMI borrowers compares favorably to its overall market share. The bank's market share in moderate-income tracts substantially meets its overall market share and is below its overall market share in low-income tracts.

The distribution of home improvement loans is excellent. The bank's percentage of loans to low-income borrowers is near to the demographics and loans to moderate-income borrowers exceed the demographics. The bank's market share for LMI borrowers is below its overall market share and exceeds its overall market share for moderate-income borrowers.

The distribution of home mortgage refinance loans is good. The bank's percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the demographics.

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.

Commerce's distribution of loans to businesses of different sizes is excellent. The percentage of loans to small businesses exceeds the percentage of small businesses in the AA. The bank's market share of small loans to small businesses exceeds the overall market share.

Small Loans to Farms

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

Commerce's distribution of loans to farms of different sizes is excellent. The percentage of loans to small farms exceeds the percentage of small farms in the AA. The bank's market share of small loans to small farms for 2002 is greater than its overall market share.

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. In addition, Table 5 includes geographic

lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank's community development lending is excellent and had a positive impact on the Lending Test rating.

Commerce originated 21 community development loans to 15 organizations or businesses totaling \$17.7 million. The bank originated 11 loans to organizations that provide services to LMI residents and 8 loans to organizations and businesses to provide LMI housing. The remaining loans were for economic development or for the revitalization and stabilization of LMI areas or within the Wichita Neighborhood Revitalization Areas.

Based on information gathered through community contacts, these loans were responsive to the identified needs in the AA.

Product Innovation and Flexibility

Commerce offers four flexible home mortgage loan products to assist LMI borrowers in achieving home ownership. Three are Federal National Mortgage Association programs that feature reduced down payment requirements, higher debt ratios, or more flexible sources of down payment funds. The bank also participates in the City of Wichita's HOMEownership 80 Program-First Time Home Buyer Assistance Program. This program assists LMI borrowers in obtaining mortgage financing. The bank does not maintain a history of the volume of loans under these programs. These loan products had a neutral impact on the lending test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Non-MA assessment areas is not inconsistent with the bank's overall outstanding performance under the lending test. Refer to Tables 1 through 12 in appendix C for the facts and data that support these conclusions.

The bank's geographic distribution of loans by income level of the geography is excellent. The bank exceeded the demographic in middle-income tracts for home purchase, home improvement, home refinance, small business, and small farm loans

The bank's distribution of loans by borrower income level is excellent. The distribution of loans by borrower income level was excellent for home improvement, small business, and small farm loans. The distribution of loans by borrower income level was good for home purchase and home improvement loans.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Wichita AA is good. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Commerce demonstrated good responsiveness to community development investment needs with its \$595 thousand in qualified investments during the evaluation period. In addition, the bank holds \$2.3 million in investments originated during prior evaluation periods. The AA offers a moderate level of opportunities to participate in community development investments.

The bank provided \$312 thousand in charitable contributions to qualified community development organizations. The majority of these funds assisted organizations that provide services that include economic development, LMI housing, financial counseling, and other services to LMI persons and geographies.

CBI's venture capital affiliate, Kansas Venture Capital (KVC) is a licensed Small Business Investment Company (SBIC). KVC partners its resources with other investors' contributions to create more financing opportunities in the State of Kansas. These investments often involve complex financing arrangements. SBIC investments during this evaluation period totaled \$78 thousand.

Major prior period investments still outstanding include \$1 million in low-income housing developments, \$634 thousand in the KVC, and \$400 thousand in Housing and Urban Development (HUD) Partnership certificates. The HUD partnership certificates help fund federal Community Development Block Grant programs. These investments provide continued support for the housing and other qualified investment needs of LMI residents.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Non-MA AA is weaker than its overall "High Satisfactory" performance under the investment test. Refer to Table 14 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Wichita AA is excellent.

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.

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank has 14 branch offices and 33 ATM locations in the AA. The percentage of bank offices in LMI tracts exceeds the percentage of population residing in those tracts. The excellent distribution of branch locations in LMI tracts had a major impact on the bank's overall service test performance.

Commerce closed one branch office in a middle-income tract during the evaluation period.

Products and services offered at the various bank locations do not vary substantially. Hours at branches in the LMI tracts are comparable to those at other locations. All offices offer daily, extended afternoon hours for the lobby and drive-up.

Commerce offers a free checking account and low minimum balance savings and IRA products. Alternative delivery systems include Internet banking, telebanking, and a 24-hour account information line. These alternative systems did not impact the service test performance, as the bank did not provide any data to demonstrate the impact of these systems in LMI geographies or the use of these systems by LMI individuals.

Community Development Services

The bank provides a relatively high level of community development services. Commerce staff provided their financial expertise to over 50 organizations that offer health care, small business development, job training, credit counseling, and housing to LMI residents. Bank officers and other staff members serve as executive directors, Board members, finance committee members, planning committee members, and allocation committee members for community development organizations and agencies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Non-MA AA is not inconsistent with the bank's overall "Outstanding" performance under the Service test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Service delivery systems are readily accessible to geographies of different income levels. The bank closed one branch office located in an upper-income geography during this evaluation

period. The bank sold two branch offices located in middle-income geographies to other financial institutions.

The bank has 9 branch offices located in Kansas within existing branches operated by Commerce Bank, headquartered in Missouri. The sole purpose of these offices is to accept public funds. The percentage of branch offices in moderate-income tracts exceeds the percentage of the population in those tracts. The excellent distribution of branch office locations had a positive impact on the bank's overall service test rating.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities 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): July 1, 2000 to December 31, 2002 Investment and Service Tests and CD Loans: July 1, 2000 to December 31, 2003	
Financial Institution	Products Reviewed	
Commerce Bank, National Association Wichita, Kansas (Commerce)	Small business loans, small farm loans, home mortgage loans, community development loans.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Commerce Bancshares Inc, Commerce Mortgage Company Kansas Venture Capital	Holding Company Common ownership Common ownership	Community development investments Home mortgage loans Equity Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Wichita, Kansas MA Non-MA assessment areas	“Full-Scope” “Limited-Scope”	

Appendix B: Market Profiles for Full-Scope Areas

Market Profiles for Areas Receiving Full-Scope Reviews

Wichita AA

Demographic Information for Full Scope Area: Wichita AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	112	8.93	22.32	51.79	16.96	NA
Population by Geography	454,242	5.81	18.39	54.46	21.35	NA
Owner-Occupied Housing by Geography	113,681	3.50	14.79	57.88	23.83	NA
Business by Geography	25,201	5.44	27.68	51.20	15.68	NA
Farms by Geography	908	1.21	8.59	72.14	18.06	NA
Family Distribution by Income Level	123,013	18.20	18.10	25.37	38.33	NA
Distribution of Low and Moderate Income Families throughout AA Geographies	44,653	10.22	26.98	53.72	9.09	NA
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below Poverty Level		35,931 59,000 10.8%	Median Housing Value Unemployment Rate (1990 US Census)		58,446 2.7%	

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

Source: 1990 US Census and 2003 HUD updated MFI

The Wichita AA is comprised of 112 census tracts in Butler and Sedgwick Counties of Kansas. The greater Wichita MA's population exceeds 500 thousand and is located in the south central portion of Kansas. Wichita is home to Wichita State University (the area's largest) and other smaller universities.

Wichita is one of the major manufacturing centers in the Midwest. Koch Industries is the largest firm headquartered in Wichita and the second largest privately held firm in the nation. Several aircraft manufacturers operate in Wichita, including its largest employer, Boeing, with over 17 thousand workers. Other aircraft manufacturers include Cessna, Raytheon, and Bombardier (Learjet Inc.). According to the Wichita Chamber of Commerce, these companies combine to supply more than half of the world's general aviation and military aircraft.

Competition in the financial services industry is strong in Wichita. Competing banks in Wichita include Intrust Bank, N.A., Bank of America, Fidelity Bank, Capital Federal, Emprise Bank, World Savings Bank, and Commercial Federal Bank.

We noted a moderate level of opportunities to originate community development loans and investments and a high level of opportunities for community development services.

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 assessment area may receive positive CRA consideration.
- 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/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.
- 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.

Institution ID: COMMERCE BANK, N.A.

Table 1. Lending Volume

LENDING VOLUME		Geography: COMMERCE BANK, N.A.				Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2003):	% 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:												
Wichita AA	42.65	369	31,983	920	166,595	176	10,556	21	17,664	1,486	226,798	65.40
Limited Review:												
Non-MA AAs (3 AAs combined)	57.35	420	33,882	850	71,785	717	49,098	11	21,498	1,998	176,263	29.40

* Loan Data as of January 01, 2003. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2003 to January 1, 2004.

*** Deposit Data as of June 30, 2003. The bank also has nine branches within branches, which represents 5.2% of deposits. Refer to Service Test comments for detail. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: COMMERCE BANK, N.A.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: COMMERCE BANK, N.A.				Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wichita AA	59	34.91	3.50	1.69	14.79	6.78	57.88	50.85	23.83	40.68	0.14	0.00	0.00	0.09	0.26
Limited Review:															
Non-MA AAs (3 AAs combined)	110	65.09	NA	NA	8.64	20.91	56.27	35.45	35.08	43.64	2.90	NA	7.02	1.78	3.45

* Based on 2002 Peer Mortgage Data: Midwest 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: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wichita AA	114	67.46	3.50	4.39	14.79	10.53	57.88	49.12	23.83	35.96	1.39	0.00	1.61	1.44	1.37	
Limited Review:																
Non-MA AAs (3 AAs combined)	55	32.54	NA	NA	8.64	9.09	56.27	50.91	35.08	40.00	6.36	NA	0.00	4.04	11.11	

* Based on 2002 Peer Mortgage Data: Midwest 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.

Institution ID: COMMERCE BANK, N.A.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wichita AA	194	43.79	3.50	3.09	14.79	7.73	57.88	43.81	23.83	45.36	0.41	1.03	0.56	0.34	0.46	
Limited Review:																
Non-MA AAs (3 AAs combined)	249	56.21	NA	NA	8.64	9.64	56.27	48.19	35.08	42.17	3.76	NA	6.92	3.72	3.42	

* Based on 2002 Peer Mortgage Data: Midwest 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 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Wichita AA	2	25.00	5.14	0.00	20.95	100.00	53.48	0.00	20.44	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Non-MA AAs (3 AAs combined)	6	75.00	NA	NA	25.48	0.00	34.58	100.00	39.93	0.00	30.00	NA	0.00	75.00	0.00	

* Based on 2002 Peer Mortgage Data: Midwest Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Institution ID: COMMERCE BANK, N.A.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
Full Review:																
Wichita AA	920	51.98	5.44	7.07	27.68	21.63	51.20	44.46	15.68	26.85	2.42	2.31	3.04	2.33	2.54	
Limited Review:																
Non-MA AAs (3 AAs combined)	850	48.02	NA	NA	21.95	24.12	49.85	51.65	28.20	24.24	7.45	NA	10.13	7.86	6.48	

* Based on 2002 Peer Small Business Data: US and PR.

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: COMMERCE BANK, N.A.						Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wichita AA	176	19.71	1.21	1.14	8.59	0.57	72.14	92.61	18.06	5.68	15.79	0.00	0.00	17.00	13.16
Limited Review:															
Non-MA AAs (3 AAs combined)	717	80.29	NA	NA	3.91	4.32	73.73	73.08	22.36	22.59	35.34	NA	72.73	34.01	38.02

* Based on 2002 Peer Small Business Data: US and PR.

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

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

Institution ID: COMMERCE BANK, N.A.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COMMERCE BANK, N.A.						Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Wichita AA	59	34.91	18.20	10.17	18.10	23.73	25.37	15.25	38.33	50.85	0.17	0.11	0.16	0.00	0.38
Limited Review:															
Non-MA AAs (3 AAs combined)	110	65.09	14.76	8.18	17.83	13.64	24.31	27.27	43.09	50.91	3.68	2.04	1.83	3.17	5.74

* Based on 2002 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% 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: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Wichita AA	114	67.46	18.20	17.54	18.10	18.42	25.37	26.32	38.33	37.72	1.48	1.97	1.18	1.63	1.36	
Limited Review:																
Non-MA AAs (3 AAs combined)	55	32.54	14.76	14.55	17.83	18.18	24.31	25.45	43.09	41.82	6.88	0.00	8.33	8.33	7.41	

* Based on 2002 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

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

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

Institution ID: COMMERCE BANK, N.A.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: COMMERCE BANK, N.A.					Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Wichita AA	194	43.79	18.20	7.81	18.10	18.75	25.37	19.27	38.33	54.17	0.51	0.51	0.32	0.45	0.67	
Limited Review:																
Non-MA AAs (3 AAs combined)	249	56.21	14.76	6.88	17.83	12.55	24.31	23.89	43.09	56.68	4.57	4.48	2.22	4.25	5.46	

* Based on 2002 Peer Mortgage Data: Midwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.90% 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: COMMERCE BANK, N.A.			Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wichita AA	920	51.98	59.06	62.50	60.87	16.85	22.28	2.42	5.03
Limited Review:									
Non-MA AAs (3 AAs combined)	850	48.02	60.49	82.00	82.24	8.24	9.53	7.45	17.51

* Based on 2002 Peer Small Business Data: US and PR.

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.67% of small loans to businesses originated and purchased by the bank.

Institution ID: COMMERCE BANK, N.A.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COMMERCE BANK, N.A.			Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wichita AA	176	19.71	92.07	96.59	84.09	11.93	3.98	15.79	19.74
Limited Review:									
Non-MA AAs (3 AAs combined)	717	80.29	93.07	95.82	82.15	12.41	5.44	35.34	38.45

* Based on 2002 Peer Small Business Data: US and PR.

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.34% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: COMMERCE BANK, N.A. Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 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:									
Wichita AA	5	2,300	151	595	156	2,895	78.07	0	0
Limited Review:									
Non-MA AAs (3 AAs combined)	6	586	276	149	182	735	19.82	0	0
Statewide/Regional	0	0	1	78	1	78	2.10	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.

Institution ID: COMMERCE BANK, N.A.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: COMMERCE BANK, N.A. Evaluation Period: JULY 1, 2000 TO DECEMBER 31, 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:																	
Wichita AA	65.40	14	41.18	7.14	57.14	28.58	7.14	0	1	0	0	-1	0	5.81	18.39	54.46	21.35
Limited Review:																	
Non-MA AAs (3 AAs combined)	29.4	11	32.35	NA	27.28	36.36	26.47	0	1	NA	0	0	-1	NA	10.47	56.36	32.31
Branches within branches	5.2	9	26.47	0.00	56.00	44.00	0.00	0	0	NA	0	0	0	4.80	19.63	47.15	28.42