



Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## **PUBLIC DISCLOSURE**

September 14, 2009

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

MetLife Bank, National Association  
Charter Number: 23743

501 Route 22  
Bridgewater, NJ 08807

Office of the Comptroller of the Currency  
New York Metro Field Office  
343 Thornall Street  
Edison, NJ 08837

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

# Table of Contents

**INSTITUTION'S CRA RATING ..... 1**

**DESCRIPTION OF INSTITUTION..... 1**

**SCOPE OF EXAMINATION..... 2**

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW ..... 2**

**APPENDIX A: SCOPE OF EXAMINATION .....A-1**

**APPENDIX B – TABLES OF PERFORMANCE.....B-1**

# INSTITUTION

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**. The rating is based on the following factors:

For the years 2005, 2007 and 2008:

- The bank met its strategic plan goals for originating qualified community development loans and investments during the period under review;
- The bank met its strategic plan goals for originating/purchasing residential mortgage loans during the period under review; and
- The bank substantially met its strategic plan goal for providing community development services during the period under review.

For the year 2006:

- The volume of lending in the AA is adequate;
- The bank's distribution of home mortgage loans among the AA geography of different income levels is adequate;
- The bank's record of originating community development loans is good;
- The bank's record of making qualified investments is adequate; and
- The level of services provided by the bank is adequate.

## DESCRIPTION OF THE INSTITUTION

MetLife Bank, N.A. is an intrastate bank headquartered in Bridgewater, New Jersey. The bank received its charter on February 23, 1999 and was acquired by MetLife, Inc. in February 2001. MetLife, Inc. is also the holding company for Metropolitan Life Insurance Company, one of the largest insurance companies in the United States. Through its numerous subsidiaries, MetLife, Inc. offers a full array of financial services to the general public. As of December 31, 2008 the bank had \$10.3 billion in total assets, \$6.9 billion in total deposits, \$4.9 billion in net loans, and \$4.4 billion in investments. The bank has one deposit-taking office, located at their headquarters at 501 Route 22, Bridgewater, NJ. Most deposit activities are conducted by telephone, mail or through the Internet. Deposit accounts are solicited through nationwide advertising and by referrals from agents of the Metropolitan Life Insurance Company. Deposits are also obtained from employees of affiliated companies. Loan products include commercial loans, agricultural loans and commercial real estate loans. Almost all of these loans are purchased from affiliated and non-affiliated parties, or co-originated with affiliated parties. Residential mortgages were offered through a non-affiliated party beginning in 2006 and ended in 2008. In September 2008, the bank acquired a mortgage company to create MetLife Home Loans, an affiliate of the bank.

The previous CRA examination, under the strategic plan procedures, dated March 21, 2005, rated the bank as "Satisfactory." There are no financial or legal impediments that would hinder the bank's ability to meet its CRA goals.

## DESCRIPTION OF ASSESSMENT AREA

The bank's Assessment Area (AA) consists of the entire Edison, NJ Metropolitan Division (20764) of

the New York – Newark – Edison NY/NJ Metropolitan Statistical Area (35620). The AA consists of Middlesex, Monmouth, Ocean and Somerset counties, all in New Jersey. The assessment area meets applicable regulatory guidelines and does not arbitrarily exclude any areas.

Demographics for the AA are based on 2000 census data. The current AA consists of 496 census tracts. The classification of the census tracts by income levels are as follows: 23 low-income (4.64%); 91 moderate-income (18.35%); 256 middle-income (51.61%); 123 upper-income (24.80%); and 3 not classified (0.60%). The population of the AA is 2,173,869. The 2008 HUD adjusted median family income for the AA is \$90,000. Owner-occupied housing units comprise 68% of the housing stock. The median housing value was \$182,418 in 2000, but has increased substantially since then. The distribution of households in the AA by income levels is as follows: 4.53% classified as low-income; 18.17% classified as moderate-income; 52.15% classified as middle-income; and 25.15% classified as upper-income. There are no apparent gaps of coverage or exclusion of any low- or moderate-income census tracts within the AA.

Business loans, affordable housing and financial literacy education are in need throughout the AA. Due to the current recessionary economic environment and the recent credit crunch, loans and micro loans to small businesses are the primary credit need in the AA. Despite the recent drop in house prices, affordable housing remains a need. Public officials have set up various programs to promote economic development within their respective counties. The Ocean County Department of Planning has set up the Community Development Block Grant Program which promotes a wide range of affordable housing to the elderly as well as first time home buyers and low-moderate income individuals. Edison Township in Middlesex County has established a Neighborhood Preservation Program to revitalize the Amboy Avenue area to make it more attractive to residents, businesses and visitors. Some of the identified goals of this program include: Housing Rehabilitation Grants, Material Grants and Facade Grants to Businesses and Improvements to local Parks. Monmouth County, along with the U.S. Department of Housing and Urban Development, has established a home repair assistance program to financially qualified residents. This program provides up to \$20,000, 10 year, interest free loans to homeowners with financial difficulties that need to repair their primary residences and encourages them to remain in their communities. Due to the high concentration of financial institutions in the AA, participation in these programs is highly competitive and remains one of the main challenges for the banks.

## **SCOPE OF EXAMINATION**

The bank was evaluated under the strategic plan goals for the years 2005, 2007 and 2008. The strategic plan establishes measurable goals for a combination of community development (CD) Loans and Investments, both for originations or purchases, and for the maintained balance. In addition, measurable goals are listed for CD Services. For evaluation of 2005, there is an amended plan that was OCC approved in June 2004. The strategic plan for 2007-2008 was OCC approved in January 2007. The goal of both plans is to achieve a Satisfactory CRA rating. For 2006, the bank did not operate under a strategic plan so we evaluated the bank under the Large Bank criteria that includes lending, qualified CD loans and investments. The lending test evaluates a bank's record of helping meet the credit needs of its AA through its lending activities. The CD test evaluates a bank's CD lending, qualified investments, and CD services.

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

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

**CONCLUSIONS:**

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b>		
	<b>Strategic Plan Goal</b>	<b>Actual Performance</b>
<b>Qualified Community Development Loans and Investments</b>	2005- 1.5% of average annual deposits (\$46.5 million)  2007- \$45 million  2008- \$48 million	2005- \$48.0 million  2007- \$53.3 million  2008- \$55.0 million
<b>Community Development Services: Homeowner Counseling Programs</b>	2007- 5 programs  2008- 6 programs	2007- 5 programs  2008- 7 programs
<b>Community Development Services: Board and Committee Positions</b>	2005- 5 positions  2007- 4 positions  2008- 4 positions	2005- 6 positions  2007- 5 positions  2008- 7 positions
<b>Residential Mortgage Loans to LMI Individuals</b>	2007- up to maximum of \$1.4 million  2008- up to a maximum of \$2.5 million	2007- \$3.2 million  2008- \$9.5 million
<b>Community Development Services: Financial Education Programs for Elementary and High School Students</b>	2007- 5 programs  2008- 6 programs	2007- 0 programs  2008- 0 programs

The bank’s 2005 strategic plan did not require the bank to participate in Financial Education Programs, instructors in Homeownership Counseling Seminars, or have goals for Residential Mortgage Loans to LMI individuals (bank did not offer that type of product in 2005).

**Community Development Loans and Investments**

The bank has met its strategic plan goals for making community development loans and qualified investments for 2005, 2007, and 2008.

Examples of community development loans and investments include:

- A \$1 million loan to a community loan fund, which is a certified CDFI that serves the state of New Jersey. This organization has funded projects located in all four counties within the bank's Assessment Area;
- A \$1.4 million loan to a new market tax credit group to build a charter school in an LMI area in Middlesex County;
- A \$5 million loan to a corporation for supportive housing that makes loans and grants to nonprofit organizations to create permanent affordable housing for the chronically homeless. A specific emphasis was placed on the counties within the bank's AA;
- The loans funded housing in Middlesex, Somerset, Monmouth and Ocean counties;
- A \$5 million investment in an affordable housing mortgage fund that made a \$7.6 million construction loan to build a 100 unit affordable rental housing in Monmouth County. Construction has been completed and the built community has income restrictions;
- An \$8 million investment in a tax credit fund, which provides a low income housing tax credit development for seniors. This created 48 homes in Middlesex County; and
- A \$3 million investment in a certified CDFI fund which provides SBA loans to businesses in Middlesex, Monmouth, Ocean, and Somerset counties.
- \$750,000 in grants during 2005 to benefit Hurricane Katrina relief efforts that revitalized and stabilized the designated disaster areas affected by Katrina.

### **Community Development Services**

The bank has met its strategic plan goals for community development services for 2005, 2007, and 2008.

The bank's strategic plans identified the following community development service goals:

- For 2005 and 2007-2008: maintain representations on Boards of non-profit or community-based organizations.
- For 2007-2008 only: participate as an instructor in homeownership counseling seminars, and provide financial education programs directed at LMI students.

The bank sufficiently met its Board representation goal and homeownership counseling goal; although, did not meet its goal for providing financial education programs directed at students from low- and moderate-income families. The bank demonstrated a good faith effort to accomplish its goal as the bank provided numerous financial education programs at schools where students from low- and moderate-income families represented about 20-40% of the students. However, the educational programs provided were not conducted at schools that served primarily students from low- and moderate-income families. There are a limited amount of school districts within the Edison AA in which the students were primarily from low- and moderate-income families; consequently when the bank contacted those districts, there were either other banks with programs already established or not a strong interest in having the bank put a program in place.

Examples of community development services include:

- A bank officer served on both the Board and loan committee of a non-profit community development organization. The organization provides financing to small business owners that cannot access financing through more conventional means. In addition to financing, the organization also mentors small business owners. This is a NJ based organization that includes activity in the bank's AA;
- A bank officer serves on the NJ advisory board of a national non profit corporation and Community Development Financial Institution (CDFI) that helps communities create permanent

housing. The organization provides support and development expertise by making loans and grants to supportive housing sponsors, by strengthening the supportive housing industry, and by reforming public policy to make it easier to create and operate supportive housing. This includes activity in the bank's AA;

- A bank officer serves on a committee evaluating credit for an organization that seeks to eliminate substandard housing. The organization helps low-income families achieve home ownership. This organization is located in Monmouth County and is part of the bank's AA;
- A bank officer serves as an advisory Board member for a non-profit organization that targets entrepreneurs in underserved urban communities. The organization assists entrepreneurs in pursuing their business aspirations. This is a NJ based organization that includes activity in the bank's AA; and
- A bank officer provided a first time home buyer seminar and sponsorship to help LMI individuals and families in Somerset and Middlesex County and is part of the bank's AA.

## Appendix A - Scope of Examination

The bank was evaluated under the strategic plan goals for the years 2005, 2007 and 2008. The strategic plan establishes measurable goals for a combination of community development (CD) Loans and Investments, both for originations or purchases, and for the maintained balance. In addition, measurable goals are listed for community development Services. For evaluation of 2005, there is an amended plan that was OCC approved in June 2004. The strategic plan for 2007-2008 was OCC approved in January 2007. The goal of both plans is to achieve a Satisfactory CRA rating. For 2006, the bank did not operate under a strategic plan so we evaluated the bank under the Large Bank criteria that includes lending, investments, and services tests.

<b>SCOPE OF EXAMINATION</b> Strategic Plan for 2005, 2007 and 2008. Large Bank criteria for 2006.			
<b>TIME PERIOD REVIEWED</b>	January 1, 2005 to December 31, 2008		
<b>FINANCIAL INSTITUTION</b> MetLife Bank, National Association Bridgewater, NJ			<b>PRODUCTS REVIEWED</b>  For 2006: home purchase, home improvement, and home mortgage refinance.
<b>FINANCIAL INSTITUTION/ AFFILIATE</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
MetLife Foundation	Affiliate		Community Development Grants and Donations
MetLife, Inc.	Affiliate		Community Development Investments
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
Edison, NJ MD	2005, 2007, 2008 Strategic Plan  2006 Large Bank	Bridgewater, NJ	

**The performance level for 2006 of MetLife Bank, NA as evaluated under the Large Bank criteria is satisfactory.**

- The volume of bank lending in its AA is adequate, taking into consideration the bank's strategic focus and lack of branches. The bank is not a significant mortgage lender in the area as evidenced by its market share ranking.
- The level of qualified investments is adequate.
- The bank's record of originating community development loans is good.
- The level of services provided by the bank in 2006 is adequate.

**Lending Activity**

The volume of bank lending in its AA is adequate, taking into consideration the Bank's strategic focus and lack of branches. MetLife Bank, NA is not a significant mortgage lender in the area as evidenced by its market share ranking.

Home purchase loans represent 41% and home refinance loans represent 54% of total home mortgage loan origination volume. Loans for home improvement comprise less than five percent of all home mortgage loans for the bank in 2006.

According to June 30, 2005 FDIC deposit market share information, MetLife Bank, NA ranked 9th in the Edison MD with a market share of 3%. Larger national and regional banks dominate this market, with eight other institutions comprising nearly 70% of the market share in the MD. As discussed earlier, most of the bank's deposits are obtained through the internet and, therefore, are derived from primarily outside of the AA.

In overall home mortgage lending, MetLife Bank, NA ranked 242nd in 2006 with a market share of 0.02%. Competition in the AA is strong, with approximately 660 lenders originating or purchasing home mortgage loans in 2006.

In home purchase lending for 2006, MetLife Bank, NA ranked 208 among all lenders originating in the AA. The bank's market share was 0.03%. Competition in the AA is strong, with approximately 520 lenders originating or purchasing home purchase loans.

Similar to home purchase loans, MetLife Bank, NA ranked 230 in home refinance lending in the evaluation period with a market share of 0.02%. Also similar to home purchase loans, competition for home refinance loans is strong in the AA, with approximately 540 lenders in 2006.

For home improvement lending in 2006, MetLife Bank, NA ranked 179<sup>th</sup> of over 260 lenders with a 0.01% market share. This volume is not sufficient to conduct a meaningful analysis of this product.

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

The bank's geographic distribution of home mortgage loans is adequate taking into consideration AA demographics and competition. As discussed in the Market Profile section, less than 4% of the AA's owner-occupied housing units are in low-income CTs. Accordingly, we gave greater consideration to

lending in moderate-income tracts. Also, according to 2006 market share data, over 660 lending institutions originated mortgage loans in the AA.

As mentioned in the Scope of Evaluation section, the Bank did not originate any multifamily loans, small business loans, or small farm loans during the evaluation period. Consequently, a meaningful geographic distribution analysis of these loan products for the evaluation period could not be performed.

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

#### **Home Purchase**

The bank's home purchase loan geographic distribution for the 2006 evaluation period is poor. While the bank's performance was below the demographic in moderate-income geographies, the bank had no loans in low-income geographies. In the LMI tracts, the bank's market share for home purchase loans was also below the overall market share.

#### **Home Refinance**

The geographic distribution of home refinance loans in the evaluation period is adequate. While the bank's performance was somewhat below the demographic in moderate-income geographies, the bank had no loans in low-income geographies. In the LMI tracts, the Bank's market share for home refinance loans was also below its overall market share.

#### **Home Improvement**

Home improvement loans are not considered a significant product for MetLife Bank; the bank only made two such loans in 2006. As such, a meaningful analysis of its geographic distribution for the evaluation period could not be performed.

### **Lending Gap Analysis**

We completed a lending gap analysis for the bank's AA. We note that MetLife Bank did not originate home mortgage loans in low-income tracts in its AA in 2006. We recognize that 2006 was the Bank's first full year of home mortgage lending, that less than 5% of the census tracts in the AA are categorized as low-income and that less than 4% of owner occupied housing units in the AA are in low-income tracts. Moreover, according to data available from Freddie Mac and Moody's, the State of New Jersey is ranked 48<sup>th</sup> in terms of housing affordability, with 1<sup>st</sup> considered as most affordable. This makes it difficult for potential LMI borrowers to afford a home. Similarly, the AA has a housing affordability ratio of approximately 33%, with 100% considered being very affordable.

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

The analysis of the bank's lending inside and outside of its AA was performed at the bank level. Additionally, information used in the analysis includes bank originations and purchases only and not extensions of credit by affiliates that are being considered under the other performance criteria.

During the evaluation period, MetLife Bank, NA originated a low volume of loans within its AA and is reflective of the bank's overall business strategy and lack of retail branches in the AA. Because of this focus, minimal weight was given to this analysis.

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

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

Overall, MetLife Bank's distribution of home mortgage loans by borrower income level is poor. As discussed in the Market Profile section, approximately 6% of the households in the AA are below the poverty level. Also, based on the average income of low-income families and the relatively high median housing cost, it would be difficult for these families to afford a house in the AA.

#### **Home Purchase**

The bank did not originate or purchase any home purchase loans with either low- or middle-income borrowers in 2006. As noted above, 2006 was the first full year that the bank had made mortgage loans of any kind. Nonetheless, the bank's performance is considered very poor.

This performance, however, is somewhat mitigated when taking into consideration the percentage of households living below the poverty level and difficulty of low- and middle-income borrowers affording a home in the AA.

#### **Home Refinance**

For the 2006 evaluation period, the bank's distribution of home refinance loans by borrower income category is good. While the percentage of MetLife Bank, NA loans to low-income borrowers is well below the percentage of families in this income category, its market share in this category exceeds its overall home refinance market share. This performance is considered good when taking in to consideration the percentage of families below the poverty level, difficulty of low-income borrowers in affording a home in the AA, and that the bank's market share in this income category was twice its overall market share. MetLife Bank's lending performance with moderate-income borrowers exceeded the borrower characteristics. The bank's market share in this income category was consistent with its overall home refinance market share.

#### **Home Improvement**

This is not considered a significant product for MetLife Bank, NA. As a result, the bank originated only two such loans during 2006. Consequently, a meaningful borrower distribution analysis of this loan product for the evaluation period could not be performed.

### ***Small Loans to Businesses***

As discussed in the Description of Institution section, small business lending is incidental to the Bank's business strategy and is not a primary loan product. Moreover, MetLife Bank, NA does not routinely collect income information for small loans to businesses. A substantial majority of these loans are business credit card or indirect business auto loans, for which revenue information is not available. For the evaluation period, nearly all of the small loans to businesses did not have revenue information available. Therefore, an analysis of this data would not be meaningful.

## **Community Development Lending**

The bank's record of originating community development loans is good with 9 community development loans totaling \$14 million in 2006.

**Qualified Investments**

The level of qualified investments is adequate. The bank had 1 qualified investment committed at \$5 million with \$641,000 funded in 2006.

**Services**

The level of services provided by the bank in 2006 is adequate. The bank provided for 2 homeowner counseling seminars in 2006 as part of a coalition for affordable housing. Bank officers served on 8 Board and Committee positions in 2006. Organizations included or a non-profit organization that targets entrepreneurs in underserved urban communities and a non-profit community development organization that provides financing to business owners that cannot access financing through more conventional means. This organization also mentors small business owners. All services reviewed benefit the bank's assessment area.

**Retail Services**

The bank's only branch is located in a middle-income neighborhood with normal banking hours and has a 24-hour ATM. No branches were opened or closed. Bank provides typical banking services with most deposit and lending activities conducted via internet, mail and phone.

**Table 1. Lending Volume**

LENDING VOLUME 2006		Geography: EDISON NJ MD						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,				
MA/Assessment Area (2006):	% 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>												
MetLife Edison MD	100.00	41	11,023	0	0	0	0	9	14,004	41	11,023	3.91

\* Loan Data as of December 31, 2006. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2006 to December 31, 2006.

\*\*\* Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2006		Geography: EDISON NJ MD								Evaluation Period: JANUARY 1, 2006 TO					
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>															
MetLife Edison MD	17	100.00	3.50	0.00	14.87	11.76	51.71	70.59	29.93	17.65	0.03	0.00	0.02	0.04	0.02

---

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT 31, 2006			Geography: EDISON NJ MD						Evaluation Period: JANUARY 1, 2006 TO DECEMBER						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	2	100.00	3.50	0.00	14.87	50.00	51.71	0.00	29.93	50.00	0.01	0.00	0.05	0.00	0.03

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* 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 units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2006			Geography: EDISON NJ MD						Evaluation Period: JANUARY 1, 2006 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	22	100.00	3.50	0.00	14.87	13.64	51.71	59.09	29.93	27.27	0.02	0.00	0.01	0.03	0.03

\* Based on 2006 Peer Mortgage Data (Eastern)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY 2006		Geography: EDISON NJ MD						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	0	0.00	7.81	0.00	24.08	0.00	53.46	0.00	14.66	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: EDISON NJ MD						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2006							
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**	% Families1	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	17	100.00	19.11	0.00	18.58	0.00	22.73	56.25	39.58	43.75	0.02	0.00	0.00	0.04	0.02

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 5.9% 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.

1 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2006		Geography: EDISON NJ MD								Evaluation Period: JANUARY 1, 2006 TO					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total* *	% Famili es***	% BANK Loans****	% Families2	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	2	100.00	19.11	0.00	18.58	0.00	22.73	50.00	39.58	50.00	0.01	0.00	0.00	0.02	0.02

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 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.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2006		Geography: EDISON NJ MD								Evaluation Period: JANUARY 1, 2006 TO					
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 <sup>3</sup>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MetLife Edison MD	22	100.00	19.11	13.33	18.58	20.00	22.73	40.00	39.58	26.67	0.02	0.04	0.02	0.02	0.01

\* Based on 2006 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 31.8% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

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

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: EDISON NJ MD				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2006				
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>										
MetLife NA	23	33,787	1	641	24	34,428	100.00	1	4,359	

---

\* 'Prior Period Investments' means investments made in a previous 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: MetLife

**Table 12. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: EDISON NJ MD				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2006									
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>																	
MetLife NA	0.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.91	17.20	51.81	26.93

**MetLife Edison MD**

Demographic Information for Full Scope Area: MetLife Edison MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	496	4.64	18.35	51.61	24.80	0.60
Population by Geography	2,173,869	3.91	17.20	51.81	26.93	0.15
Owner-Occupied Housing by Geography	595,582	3.50	14.87	51.71	29.93	0.00
Business by Geography	138,233	3.02	13.33	51.89	31.61	0.15
Farms by Geography	3,185	0.85	8.76	53.78	36.61	0.00
Family Distribution by Income Level	570,961	19.11	18.58	22.73	39.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	215,185	7.80	25.84	52.10	14.26	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level	69,978 87,500 6%	Median Housing Value Unemployment Rate (2000 US Census)	182,418 2.34%			

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

Source: 2000 US Census and 2006 HUD updated MFI