



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

July 18, 2000

Community Reinvestment Act Performance Evaluation

**Wilber National Bank
Charter Number: 2151**

**245 Main Street
Oneonta, New York 13820**

Office of the Comptroller of the Currency

**Syracuse Field Office
231 Salina Meadows Parkway
Suite 105
Syracuse, New York 13212**

NOTE: 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.

Table of Contents

General Information	2
Definitions and Common Abbreviations	3
Overall CRA Rating	6
Description of Institution	7
Scope of Evaluation	8
Fair Lending Review	10
Conclusions with Respect to Performance Tests	
Lending Test	11
Investment Test	17
Service Test	18
Appendix A: Scope of Evaluation	A-1
Appendix B: Market Profiles for Areas Receiving Full-Scope Reviews	B-1
Appendix C: Tables of Performance Data	C-1

General Information

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

This document is an evaluation of the CRA performance of **Wilber National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of **July 18, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

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

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

Block Numbering Area (BNA) Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

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

Community Development (CD) Affordable 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.

Full-Scope Review Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

Limited-Scope 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, branch distribution).

Low-Income- Income levels that are less than 50% of the median family income.

Median Family Income (MFI) The median income determined by the United States 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 Statistical Area (MSA) Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

Small Business Loans Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital- The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Overall CRA Rating

Institution's CRA Rating This institution is rated “**Satisfactory**”.

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

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

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect an excellent responsiveness to the credit needs of the assessment area.
- The geographic distribution of loans reflects a good penetration throughout the assessment area.
- The distribution of borrowers reflects an excellent penetration among retail customers of different income levels and business customers of different sizes.
- The use of flexible lending programs had a positive impact on the bank’s lending test rating.
- There is an adequate volume of qualified investments and donations.
- The bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area.
- The bank provides a good level of community development services.

Description of Institution

Wilber National Bank (WNB) is a full service community bank located in Oneonta, New York with total assets of \$563 million as of March 31, 2000. WNB is an intrastate bank with 16 branches, including the main office. WNB has branches in the following Non-MSA counties of Delaware, Otsego, and Ulster and in the Albany-Schenectady-Troy MSA in Schoharie County. There are ten branches located in Otsego County, four branches in Delaware County, and one branch each in Ulster and Schoharie. The bank has two operating subsidiaries, Wilber REIT, Inc. and Western Catskill Realty, LLC. These two subsidiaries are real estate related. WNB's subsidiaries are located in Oneonta, New York. WNB's operating subsidiaries did not impact its ability to meet the credit needs of its AAs. Likewise, there has not been any merger activity that would affect the bank's CRA performance.

The bank is owned by The Wilber Corporation (WC), a one-bank holding company, with total assets of \$571 million as of year-end 1999. WC is also located in Oneonta, New York. Oneonta is situated in the Catskill region of New York State, and is centrally located between the cities of Albany to the northeast and Binghamton to the southwest.

There are no legal or financial impediments that hinder the bank's ability to help meet the credit needs of its community. WNB received a satisfactory rating at their last CRA performance evaluation, dated April 6, 1998. WNB faces strong competition from other financial institutions, including other community banks, credit unions, branch's of regional and multinational banks, mortgage companies, and finance companies. As of March 31, 2000 net loans and leases are \$325 million or 57% of average assets. The loan portfolio consists of 42% 1 to 4 family residential mortgages, 38% commercial loans, 19% consumer loans, and 1% municipal loans. Held-to-Maturity securities are \$80 million or 15% of average assets and Available-for-Sale securities are \$121 million or 22% of average assets. Net Tier I capital as of March 31, 2000 is \$48 million and Tier I Leverage capital ratio is 8.53%.

WNB's business strategy centers around offering community bank services, including loans, deposit, and trust services. Community-based officers are responsible for taking loan applications, including consumer and residential mortgages, but the approval process is by and large centralized.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test covers activity from January 1, 1998 to December 31, 1999. Our review covered the following loan products: home purchase loans, home improvement loans, home mortgage refinance loans, and small business loans. No community development loans were originated during the evaluation period. WNB's origination and purchase of small farm loans was not evaluated, as the lending volume was not significant enough to perform a meaningful analysis (less than 1% of the number of loan originations/purchases over the Lending Test evaluation period).

The evaluation period for the Investment and Service Tests covers April 6, 1998 to July 18, 2000. For the investment and service tests, we considered qualified investment activity and WNB's record of providing retail and community development services.

Data Integrity

We selected a sample of thirty HMDA reportable loans and thirty small business loans from the HMDA LAR (Loan Application Register) and CRA Small Business LAR, respectively. We reviewed the procedures and processes in place to collect the required information and internal procedures used to test the accuracy of the data. Our conclusion is that the information for both the HMDA and CRA LARs is accurate. We had two recommendations for improving the consistency of data collection process, but our recommendations do not affect the overall accuracy of the data.

Selection of Areas for Full-Scope Review

WNB has two assessment areas (AAs). The first AA is a non-MSA consisting of Delaware, Otsego, and Ulster Counties. The second AA is Schoharie County in the Albany-Schenectady-Troy MSA. The non-MSA AA was chosen for a full scope review as a majority of the bank's loan, deposits, and offices are in this area, while the MSA AA was chosen for a limited scope review. The full scope area constitutes a representative sample of both significant and less significant markets in which the bank operates. The ratings are based primarily on the results of the area that received a full scope review. Refer to **Appendix A** for more information.

Ratings

The bank's overall rating is based primarily on the Non-MSA AA that received a full-scope review.

Other

During our examination, we contacted a business and non-profit/labor group in the Non-MSA AA, which serves Otsego County. We discussed, via the telephone, the general economy of the area, the credit needs, and community development opportunities. This organization's primary goal is to assist the county in prospering, especially small businesses, but also to improve the standard of living for all residents.

The contact indicated that the credit needs in this AA are small business- and housing-related. According to the contact, community development opportunities are limited. The contact stated that businesses in the area are primarily small, with the exception of two hospitals, two colleges, and few industrial plants. The contact also stated there was a need for quality housing in the area, as most of the new housing in the area for the past three years has been modular. Tourism is a big part of the economy, making many of the jobs seasonal in nature. Finally, the contact stated that WNB is the most active of the banks in the area for assisting in any community project.

Fair Lending Review

A Fair Lending examination was performed in conjunction with the CRA examination. We tested for discrimination on a gender basis by comparing approved home improvement mortgage loans of individual female borrowers to individual male borrowers. Our sample consisted of all individual male and female borrowers for home improvement loans between January 1, 2000 and March 31, 2000. Our analysis detected no evidence of disparate treatment. No violations of the substantive provisions of antidiscrimination laws and regulations were identified.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "**High Satisfactory**". Based on a full-scope review of the Non-MSA AA (AA), the bank's performance is good. In evaluating the bank's lending performance, equal weight was given to home mortgage products and to small loans to businesses. Housing related credits originated by WNB represent 53% by number of loans and 51% by dollar volume of loans. Small business loans represent 47% by number loans and 49% by dollar volume in the Non-MSA AA. The bank has no community development lending in this evaluation period. Community development lending opportunities are limited because of the rural nature of the area.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

WNB's lending levels reflect an excellent responsiveness to the credit needs. Primary credit needs are housing and small business related. Market rank and market share of deposits compared to the market rank and market share of lending products compares favorably when considering the strong competition for home mortgage loan and small business loans in the assessment area.

As of June 30, 1999, the bank's market share of deposits in Otsego County is 42% and market rank is one, in Delaware County market share is 13% and market rank is fourth, and in Ulster County market share is 0.5% and market rank is 15th.

WNB ranks second for all home mortgage loan products with an 8% market share. The market rank for home purchase, home improvement, and home mortgage refinance loans is four, two, and two, respectively. Market share for home purchase, home improvement, and home mortgage refinance loans is 5%, 16.9%, 8.3% respectively, in the Non-MSA assessment area. There are 251 HMDA reporting lenders. Additionally, WNB competes with non-bank mortgage lenders.

WNB is ranked third in market rank for small loans to businesses and small loans to farms. Market share for small loans to businesses and small loans to farms is 14.6% and 10.2%, in the Non-MSA assessment area. Two non-bank financial institutions rank first and second for small loans to businesses. These two institutions have more than 31% of the market share, in the assessment area. There are 47 small business loan-reporting lenders, in the assessment area.

The bank's net loans and leases to core deposit ratio at March 31, 2000 was 86%, at year end 1999 it was 84%, and at years end 1998 and 1997 it was 80%. The loan to deposit ratio indicates that the bank is lending and net loan growth has exceeded core deposit growth over the past years.

Distribution of Loans by Income Level of the Geography

The distribution of loans by income level of geography is good.

Home Mortgage Loans

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

The geographic distribution for home purchase, and home improvement loans is good. There are no low-income geographies in this area therefore we focused on the bank's record of lending in moderate-income geographies. There are only three moderate-income geographies in the Non-MSA, one in Delaware County and the remaining two in Ulster County. A local college occupies the moderate-income geography in Delaware and there is no owner occupied housing. The remaining two moderate-income geographies contain a limited percentage of owner-occupied housing, only 1%, or 1,055 housing units. In addition, these two-moderate-income geographies are located in Ulster County, where WNB has only one branch and competition from a local savings bank is particularly strong. Despite limited opportunities to lend in the moderate-income tracts, i.e. limited owner occupied housing, and strong competition, WNB did originate 1% of its total home purchase and home improvement products in the moderate-income geographies, which meets the demographics of the AA. No home refinance loans were made in moderate-income geographies.

Market share data is not meaningful to this analysis since the percentage of lending and the opportunities to lend in the moderate-income geographies is limited.

Small Loans to Businesses

Refer to Table 5 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. There are no low-income geographies in this area, so again we focused on the bank's record of lending in moderate-income geographies. The portion of small loans to businesses made in moderate-income geographies is near to the demographics. There are three moderate-income geographies in the non-MSA and only two percent, or 224 businesses, are located in these areas. WNB's record of lending in the moderate-income geographies is one percent, which is good due to the limited number of businesses in these geographies and that two of the three moderate-income tracts are in Ulster County, where WNB has only one branch.

WNB's market share data indicates that the bank has a greater market share in the moderate-income geographies than its overall market share.

Small Loans to Farms

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 farms. No analysis of small farm lending was performed, as it is not meaningful to this evaluation.

Lending Gap Analysis

There are no unexplained gaps in WNB's mortgage or small business lending patterns.

Inside/Outside Ratio

WNB originates a substantial majority of its loans within its AA. WNB's record of lending in their AAs' was factored into our geographic distribution analysis. Our analysis is based on the WNB's lending patterns at the bank level and not on the individual AAs. The information we analyzed included bank originations and purchases only. The volume of loans originated in the AAs during the evaluation period is as follows: 93% home mortgage loans, 83% small business loans, and 97% small farm loans.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by borrower income level is excellent.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

We evaluated the bank's lending practices by comparing their level of lending to low- and moderate-income families of the AA.

WNB displays a good record of lending to low- income individuals for home purchase and home mortgage refinance loans and an excellent level of lending for home improvement, when considering the high cost of housing for low-income individuals and the percentage of households that are below the poverty level.

The median housing cost in the Non-MSA assessment area is \$94,400 and the updated median family income is \$39,300. A low-income person earns less than \$19,650 and a moderate-income person earns at least \$19,650 but less than \$31,440. Additionally, more than 10% of the households in the assessment area are below the poverty level. As a result it is difficult for a low-income person to purchase a home and a reach for a moderate-income person Lending to low-income borrowers represent 8% for home purchase and 7% for refinance loans compared to 15% of low-income families and is considered good performance. Home improvement lending to low-income borrowers exceeds the demographics of the assessment area at 16% and is considered excellent performance.

WNB's displays an excellent record of lending to moderate-income borrowers. The bank's level of lending to moderate-income borrowers for home purchase and home improvement loans substantially exceeds the demographics for moderate-income families, and the level of home mortgage refinance is near to the demographics for moderate-income families.

Market share information supports that WNB has an excellent level of lending to low- and moderate-income borrowers. For home purchase, home improvement, and home mortgage refinance loans, WNB's market share of low- and moderate-income borrowers substantially exceeds the bank's overall market share in each product.

Small Loans to Businesses

Refer to Table 10 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.

WNB also displays an excellent level of lending to small businesses. We compared the bank's level of lending to the level of small businesses operating within the AA. The bank's percentage of loans to small businesses exceeds the percentage of small businesses in the AA. The bank's loans to all businesses are primarily loans under \$100 thousand. Finally, WNB's market share of loans to small businesses substantially exceeds its market share of loans to all businesses.

Small Loans to Farms

Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. No analysis of small farm lending was performed, as it is not meaningful to this evaluation.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank has no community development lending in either of its AAs. Opportunities for community development lending are limited due to the rural nature of the Non-MSA AA. Limited community development opportunities were confirmed through the community contact and our own investigation. WNB's management stated that many of the loans reported under the small business loan data collection process had community development purposes, but because the loans were reported as small business loans, they could not also be reported as community development loans.

Product Innovation and Flexibility

WNB's use of flexible lending programs had a positive impact on its lending test rating. These programs are outlined below.

Oneonta First-Time-Homeownership Projects & Programs

This program is targeted to low- and moderate-income individual and families. The homes are 1-3 family residences in the City of Oneonta that are priced less than \$80,000. Qualified individuals receive a second mortgage from the City of Oneonta, with all or a portion of it potentially forgiven. Applicants must obtain a mortgage from a participating lender such as WNB. Applicants may use a portion of the deferred second mortgage as down payment on the residence, or for closing and rehabilitation costs. WNB requires only a 10% down payment (\$1,500 must be from the individual's personal funds per program requirements), and waives the one point it normally charges on loans with down payments of less than 20%. WNB has allocated \$375,000 for this program. WNB made one loan for \$25 thousand under this program during the exam period.

City of Oneonta Downtown Revolving Loan Fund - WNB is involved in this special loan program along with the City of Oneonta. The bank provides one dollar of financing at the prevailing interest rate for every two dollars provided by the city fund. The bank has committed a total of \$300,000 to this program. Businesses must meet the bank's standards for credit history and collateral. WNB will finance up to 90% of a project associated with this program, as opposed to its usual 70%, and work with businesses to arrange additional financing through the SBA and other programs if necessary. An applicant must have a minimum 10% owner equity in a project. Loan proceeds are used to maintain or create jobs for low- and moderate-income individuals. WNB made 19 loans for \$160,000 during the exam period. These loan recipients also received \$320,000 in financing from the City.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the MSA AA is not inconsistent with the bank's overall "**High Satisfactory**" performance under the Lending Test. Refer to Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "**Low Satisfactory**". Based on full-scope review, the bank's performance in the Non-MSA AA is good.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Community development investment opportunities in the Non-MSA AA are very limited. Investment opportunities were determined through our own internal resources, through discussions with the community contact and through other public sources. While investment opportunities are limited, WNB committed to fund \$1 million in a Small Business Investment Corporation (SBIC), and made one qualified donation.

During the evaluation period, WNB invested \$131 thousand to the SBIC with the remaining amount as yet an unfunded commitment. The SBIC controls when funds must be disbursed, accounting for the large unfunded portion. SBICs are formed to provide loans to start up small businesses. The SBIC includes a boarder area that includes the bank's assessment areas. The investment in the SBIC has been allocated to both assessment areas based on the prorata share of deposits in each assessment area.

The qualifying contribution was \$75 thousand to a food pantry that assists primarily low- and moderate-income families.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the MSA is not inconsistent with the bank's overall "**Low Satisfactory**" performance under the Investment Test.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "**High Satisfactory**". Based on full-scope review, the bank's performance in the Non-MSA AA is good.

Retail Banking Services

Refer to Table 13 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.

WNB's service delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The services offered include a wide range of loan, deposit and trust services. In the Non-MSA AA, the bank operates fifteen branches, seven ATMs at branch locations, two stand alone ATMs, and seven drive-up facilities. The stand alone ATMs are cash dispensing only machines and are located at two local colleges in Oneonta, New York.

Branch distribution is excellent, as seven percent of the branches are located in moderate-income tracts versus 2.3% of the population. The branch in the moderate-income tract offers a drive-up facility and Saturday hours. Hours vary by branch location, but all offices offer some type of extended hours, which may include Saturday hours. Branch hours are tailored to meet the needs of the individual community. No offices have been opened or closed since the previous examination, dated April 6, 1998.

Alternative delivery system

WNB offers telephone banking in both AAs as an alternative delivery system. Bank-by-phone allows bank customers access to deposit and loan account information, including the ability to transfer funds, ability to apply for a loan, funds verification, and interest rate information. WNB also offers online banking via a personal computer. No documentation is maintained as to how telephone and computer banking serves low- and moderate-income customers and geographies. Therefore, no significant consideration was given to telephone and computer banking services in assigning the overall rating.

Community Development Services

WNB provides a good level of community development services. Eight employees participate in six different organizations that include housing, economic development and community services for low- and moderate-income individuals. Employees provide financial expertise and banking knowledge in reviewing loan applications, budgets, assisting in allocating resources, and planning and developing strategies. The organizations served by bank employees are responsive to the needs of the AA. Opportunities to provide community development services are available for bank involvement. The community contact stated that the bank is the most active of all the banks in the county for support and assistance in the area of community development. Again information regarding opportunities was obtained through community contact discussions, through our internal resources, and other public sources.

Downtown Oneonta Investment Program - WNB took a leadership role in the development of this program when it was formed prior to the previous public evaluation dated April 6, 1998. The Downtown Oneonta Investment Program is part of HUD's Community Development Block Grant - Small Cities Program. Major objectives include revitalization of downtown Oneonta, retention and creation of new employment opportunities particularly for persons of low- and moderate-income, and provision of low rate revolving loans for small businesses. The program is supervised by the Downtown Oneonta Investment Program Committee, which consists of four members, including a loan officer at WNB.

Oneonta First-Time-Homeownership Project - The Oneonta First-Time Home Ownership Project is a joint effort between the City of Oneonta and Opportunities for Otsego, Inc. which was mentioned earlier under the Innovative/Flexible Lending section of this report. The purpose of the program is to assist low- and moderate-income first-time homebuyers in the purchase of targeted affordable homes in the City of Oneonta. A WNB loan officer sits on a loan underwriting and a credit counseling committee of this project and provides advice in setting loan terms and conditions and evaluating loan candidates.

Executive Services Corps - Executive Services Corporation of Otsego-Delaware, Inc. is a non-profit agency of management consultants for small business, government, and nonprofit organizations. The agency promotes economic development in Otsego and Delaware Counties by providing business consulting services to new or potential startup businesses and struggling businesses, which assists in the retention and creation of jobs for low- and moderate-income individuals. A WNB loan officer serves as treasurer to the organization. An executive officer of WNB lends his financial expertise by serving as one of the business consultants. Another WNB lending officer is a member of the Corp's Small Business Council.

SHARP Committee Inc. - A bank officer has served on this committee for several years. This nonprofit organization's purpose is to provide low cost housing for low-income families and senior citizens. The organization also applies for grant monies that are used to make low interest rate loans to nonbankable businesses, which the Committee believes have the potential for maintaining or increasing jobs for low- and moderate-income individuals in the area.

New York Business Development Corporation - A bank officer serves as chairman of the loan committee for this organization. This corporation assists with originating loans to small businesses that are marginal or start up, which assists in the retention and creation of jobs for low- and moderate-income individuals.

Federal Home Loan Bank (FHLB) Affordable Housing Program - One loan officer services as a financial intermediary between the community and the Federal Home Loan Bank. In 1998 the bank was the official borrower for Habitat for Humanity. Habitat filed application through WNB to receive \$5,000 to rehabilitate a home for a low/moderate-income family. FHLB accepted the application from WNB and Habitat was the recipient of a \$5,000 grant.

Industrial Development - One Vice President services as a member of the board and reviews funding applications. Funds are primarily provided to small and start up businesses, whose employees are primarily low- and moderate-income. This organization has assisted a number of businesses in the last year.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the MSA is weaker than the bank's overall "**High Satisfactory**" service test rating. Refer to Table 13 in Appendix C for the facts and data that support these conclusions. WNB has only one branch in this AA and it is located in a middle-income geography. The fact that WNB has only one branch in this assessment area has no impact on the overall conclusion for the service test. WNB does offer the same services at this branch as at the other branches and hours are tailored to the community. Community development services are also fewer, with the Federal Home Loan Bank Affordable Housing Program being offered in this area.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan 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): 01/01/1998 to 12/31/1999 Investment and Service Tests and CD Loans: 04/06/1998 to 07/18/2000	
Financial Institution		Products Reviewed
Wilber National Bank (WNB) Oneonta, New York		Home purchase, home improvement, home mortgage refinance loans, and small business loans. All community development investment and services.
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.	NA	NA
List of AAs and Type of Examination		
AA	Type of Exam	Other Information
Non-MSA (Delaware, Otsego, and Ulster Counties in New York State) Albany-Schenectady-Troy - MSA - Schoharie County, New York #0160	Full-Scope Limited-Scope	NA

Appendix B: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews (Name of MSA or Nonmetropolitan Area)	B-2
--	-----

Non-MSA AA

Demographic Information for Full-Scope Area: Non- MSA - Delaware, Otsego, Ulster Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	78	0	4	59	37	0
Population by Geography	273,046	0	2	59	39	0
Owner-Occupied Housing by Geography	71,032	0	1	62	37	0
Businesses by Geography	11,151	0	2	58	40	0
Farms by Geography	658	0	0	70	30	0
Family Distribution by Income Level	69,629	15	17	22	46	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	21,942	0	3	74	23	0
Median Family Income	= \$31,473	Median Housing Value				= \$94,400
HUD Adjusted Median Family Income for 1998	= \$39,300	Unemployment Rate				= 4.3%
Households Below the Poverty Level	= 10.34%	Otsego				= 4.0
		Delaware				= 4.4
		Ulster				=2.8

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

Description of AA (AA)

The Non-MSA AA consists of the counties of Otsego, Delaware, and Ulster. Otsego County borders Delaware County to the south, which in turn borders Ulster County to the southwest. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. The Non-MSA AA represents 89% of the total deposits and 93% of loan originations for the evaluation period. The largest population centers include the city of Kingston in Ulster County, and the city of Oneonta in Otsego County.

There are no low-income geographies and only three moderate-income geographies. The first moderate-income geography is in Delaware County, where a college is located. The other two moderate-income geographies are located in Ulster County, where the bank has a branch.

WNB operates fifteen branches, nine ATMs (two stand alone, cash dispensing only), and seven drive-up facilities. Major competitors in the area include a wide variety of local financial institutions as well as branches of regional banks.

As of June 30, 1999, the bank's market share of deposits in Otsego County is 42%, in Delaware County 34%, and in Ulster County 0.5%. Market share of

HMDA products is 8.03% and WNB is ranked second for the Non-MSA. Market share of small business lending is 14.60% and WNB is ranked third for the Non-MSA.

As of May 2000, unemployment was 4.3% for New York State, 4.0% for Otsego, 4.4% for Delaware, and 2.8% for Ulster. The Non-MSA is primarily rural. Major employers include higher education facilities including State University of New York - Oneonta, and Hartwick College; medical facilities including Bassett and A. O. Fox Memorial hospitals; and various county school districts and local municipal governments. Major manufacturers include Amphenol Corporation (chemicals), Keith Clark, Inc. (publishing), and Corning Incorporated (specialty glass). The region attracts tourists and vacationers, particularly during the summer months. Major attractions include the Baseball Hall of Fame in Cooperstown and the National Soccer Hall of Fame in Oneonta. Overall the economy is considered stable.

Community Credit Needs

Our community contact confirmed the bank's assessment that small business and home loans are the primary credit needs in the AA.

Community Development Opportunities

The community contact, as well as our own research, revealed that community development loans and investments in this AA are limited due to the rural nature of the community.

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; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/AA; 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 MSA/AA.

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 MSA/AA.
- 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 rank and 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 Refinance Loans** See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

Table 7. 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 MSA/AA. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans See Table 7.

Table 9. Borrower Distribution of Refinance Loans See Table 7.

Table 10. 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 11. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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 12. Qualified Investments Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. 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 the population 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 MSA/AA.

Table 1. Lending Volume

LENDING VOLUME												
		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999								
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans	% of Rated Area Loans(#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full-Scope:												
Wilber Non-MSA	89	978	43,583	830	40,719	33	709	0	0	1,846	85,011	93
Limited-Scope:												
Wilber MSA	11	94	5,543	35	1,933	2	34	0	0	132	7,510	7

(*) Deposit data as of June 30, 1999.

(**) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is January 1, 1998 to December 31, 1999.

(***) The evaluation period for Community Development Loans is April 6, 1998 to July 18, 2000.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																
		State: New York				Evaluation Period: January 1, 1998 TO December 31, 1999										
MSA/Assessment Area:	Low-Income Geographies	Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*		Market Share by Geography**		Total Home Purchase Loans				
		% 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	#	% of Total**
Full-Scope:																
Wilber Non-MSA	0	0	1	1	61	96	38	3	4	5.0	0.0	0.0	8.9	0.3	256	93
Limited-Scope:																
Wilber MSA	0	0	67	60	33	40	0	0	6	4.6	0.0	5.5	3.3	0.0	20	7

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT										State: New York			Evaluation Period: January 1, 1998 TO December 31, 1999			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*			Total Home Improvement Loans			
	% 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	#	% of Total**
Full-Scope:																
Wilber Non-MSA	0	0	1	1	61	98	38	1	2	16.9	0.0	7.1	24.3	0.8	265	94
Limited-Scope:																
Wilber MSA	0	0	67	78	33	22	0	0	5	7.6	0.0	8.8	5.4	0.0	18	6

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE										State: New York			Evaluation Period: January 1, 1998 TO December 31, 1999			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*			Total Home Mortgage Refinance Loans			
	% 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	#	% of Total**
Full-Scope:																
Wilber Non-MSA	0	0	1	0	61	98	38	2	2	8.3	0.0	0.0	14.60	0.3	457	89
Limited-Scope:																
Wilber MSA	0	0	67	68	33	29	0	0	4	6.1	0.0	5.9	6.0	0.0	56	11

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999								
MSA/Assessment Area:	Low-Income Geographies	Moderate-Income Geographies	Middle-Income Geographies	Upper-Income Geographies	Overall Market Rank*	Market Share by Geography*				Total Small Business Loans		
	% of Businesses	% of Businesses	% of Businesses	% of Businesses		Overall	Low	Mod	Mid		Upp	#
Full-Scope:												
Wilber Non-MSA	0	2	1	58	3	14.6	0.0	18.4	22.3	0.8	830	96
Limited-Scope:												
Wilber MSA	0	53	29	47	5	10.3	0.0	5.6	18.9	0.0	35	4

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999								
MSA/Assessment Area:	Low-Income Geographies	Moderate-Income Geographies	Middle-Income Geographies	Upper-Income Geographies	Overall Market Rank*	Market Share by Geography*				Total Small Farm Loans		
	% of Farms	% of Farms	% of Farms	% of Farms		Overall	Low	Mod	Mid		Upp	#
Full-Scope:												
Wilber Non-MSA	0	0	0	70	3	10.2	0.0	0.0	10.9	0.0	33	94
Limited-Scope:												
Wilber MSA	0	70	50	30	4	4.0	0.0	0.0	10.0	0.0	2	6

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE State: New York Evaluation Period: January 1, 1998 TO December 31, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**		Market Share by Borrower Income**		Total Home Purchase Loans			
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	Overall Market Rank**	Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Wilber Non-MSA	15	8	17	22	25	42	4	5.0	15.1	9.3	7.7	4.1	256	93		
Limited-Scope:																
Wilber MSA	27	15	26	24	25	40	6	4.6	8.3	2.8	4.1	7.3	20	7		

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT State: New York Evaluation Period: January 1, 1998 TO December 31, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**		Market Share by Borrower Income**		Total Home Improvement Loans			
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	Overall Market Rank**	Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Wilber Non-MSA	15	16	17	22	25	28	2	16.9	26.6	22.9	19.9	12.2	265	94		
Limited-Scope:																
Wilber MSA	27	17	26	24	16	23	5	7.6	6.7	4.0	4.5	11.6	18	6		

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999								
MSA/Assessment Area:	Low-Income Borrowers	Moderate-Income Borrowers	Middle-Income Borrowers	Upper-Income Borrowers	Overall Market Rank**	Market Share by Borrower Income**			Total Home Mortgage Refinance Loans			
	% of Families	% of Families	% of Families	% of Families		Overall	Low	Mid		Upp	% of Total***	
Full-Scope:												
Wilber Non-MSA	15	17	22	46	2	8.3	23.5	12.6	13.5	7.9	457	89
Limited-Scope:												
Wilber MSA	27	26	24	23	4	6.1	5.9	4.1	8.1	8.8	56	11

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated and purchased by the bank in the Non-MSA and 2% in the MSA.
 (**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size		Market Share***		Total Small Loans to Businesses		
	% of Businesses*	% BANK Loans**	\$100,000 or Less	> \$100,000 to \$250,000	All	Rev \$1 million or less	#	% of Total****	
Full-Scope:									
Wilber Non-MSA	77	80	89	7	4	14.6	20.7	830	96
Limited-Scope:									
Wilber MSA	76	83	83	14	3	10.3	14.9	35	4

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.
 (**) 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 16% of small loans to businesses originated and purchased by the bank.
 (***) Based on 1998 Aggregate Small Business Data only. (****) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: New York		Evaluation Period: January 1, 1998 TO December 31, 1999			
MSA/Assessment Area:	Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size		Market Share***		Total Small Farm Loans
	% of Farms*	% BANK Loans**	\$100,000 or Less	> \$100,000 to \$250,000	All	Rev \$1 million or less	
Full-Scope:							
Wilber Non-MSA	95	96	94	6	10.2	10.7	33
Limited-Scope:							
Wilber MSA	97	100	100	0	4.0	4.0	2

(*) Farms with revenues of \$1 million or less as a percentage of all farms.

(**) 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 2% of small loans to farms originated and purchased by the bank.

(***) Based on 199X Aggregate Small Farm Data only.

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

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		State: New York		Evaluation Period: April 6, 1998 To July 18, 2000			
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:							
Wilber Non-MSA	0	0	2	192	2	192	1
Limited-Scope:							
Wilber MSA	0	0	0	14	1	14	0

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

(**) A Unfunded Commitments means legally binding investment commitments that are tracked and reported by the bank's financial reporting system.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														State: New York			Evaluation Period: April 6, 1998 To July 18, 2000		
MSA/Assessment Area:	Deposits			Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches in MSA/AA	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies			# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)			% of the Population within Each Geography							
				Low	Mod	Upp			Low	Mod	Upp	Low	Mod	Upp					
Full-Scope:																			
Wilber Non-MSA	89	15	94	0	7	93	0	0	0	0	0	0	0	0	0.0	2.3	59.1	35.6	
Limited-Scope:																			
Wilber MSA	11	1	6	0	0	100	0	0	0	0	0	0	0	0.0	60.0	35.0	0.0		

Note: 5% of population for MSA resides in a NA Census Tract.