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Public Disclosure

March 1, 1999

Community Reinvestment Act Performance Evaluation

**Sandy Spring National Bank of Maryland
Charter Number: 5561
17801 Georgia Avenue
Olney, Maryland 20832**

**Comptroller of the Currency
Maryland/National Capital Area Field Office
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NOTE: 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.

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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 the 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 **Sandy Spring National Bank of Maryland** prepared by the **Comptroller of the Currency**, the institution’s supervisory agency, as of **March 1, 1999**. The agency evaluates performance in the assessment area (“AA”), as delineated by the institution, rather than individual branches. This AA evaluation may include the visit 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 C.F.R. Part 25.

Institution’s CRA Rating: This institution is rated *Satisfactory*. The factors supporting the bank’s overall rating include:

- < strong lending levels to meet identified credit needs with loan originations during the review period that represented *40% of average assets* ;
- < a high percentage of all loan originations are made within the AAs;
- < a good record of originating small business loans and lending to small businesses;
- < a good record of originating mortgage loans to borrowers in low- and moderate income geographies;
- < a good record of opening and relocating branches that has improved accessibility to bank services in moderate-income geographies;
- < delivery systems that are accessible to geographies and individuals of different income levels in its AAs; and
- < a good level of community development services provided.

The following table indicates the performance level of Sandy Spring National Bank of Maryland with

respect to the lending, investment, and service tests.

Performance Levels	Sandy Spring National Bank of Maryland Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High satisfactory	x		x
Low satisfactory		x	
Needs to improve			
Substantial noncompliance			

* Note: The lending test is weighted more heavily than the investment and service tests in the overall rating.

Description of Institution

Sandy Spring National Bank of Maryland (“SSNB”), chartered in 1868, is an affiliate of SSNB Bancorp, a one-bank holding company established in 1988. In addition to its headquarter location in Olney, Maryland, SSNB operates 20 full service branches, of which 18 have Automated Teller Machines (“ATMs”). All locations are in the state of Maryland. The bank also operates two limited service branches in elder care facilities. The majority of the branches are located in the Montgomery County portion of one of the AAs. Since 1996, the bank has opened three new branches, and closed and relocated one branch. As an alternative delivery system to a branch, the bank maintains eight remote ATM sites, including four at local gas stations, one at the Montgomery General Hospital, one at Lakeforest Mall, and one at the Montgomery County Fairgrounds. Additionally, the bank purchased a mobile ATM trailer in December 1998.

Four loan production offices (“LPOs”) are scattered across Anne Arundel, Prince George’s, and Montgomery counties. The LPOs offer consumer, marine, student, and business loans. Sandy Spring Mortgage Corporation (“SSMC”), a 1996-initiated bank subsidiary, originates residential real estate loans from four locations. Prior to SSMC’s origination of loans beginning in 1997, residential mortgage products were made by SSNB as a product line within the bank.

As of December 31, 1998, bank assets totaled \$1.34 billion, and constitute a substantial majority of the assets of the holding company. The bank offers a wide range of loan products, including various types of residential mortgage, construction, commercial and industrial, and consumer loans. For the quarters ending December 31, 1996 through December 31, 1998, the bank’s loan-to-deposit ratio averaged 65%, which is below the bank’s national and local peer group averages. On December 31, 1998, net

loans comprised 47% of total assets, and loans by type were as follows:

Loans secured by real estate	\$524.6 million	83.2%
Commercial and industrial loans	58.5 million	9.3%
Loans to individuals for household, family, and other personal expenditures	<u>47.5 million</u>	<u>7.5%</u>
TOTAL LOANS	\$630.6 million	100.0%

The bank received a CRA rating of “Satisfactory” during its last examination in September 1996. There are no financial or legal obstacles impacting the ability of SSNB or SSMC to help meet its community’s credit needs. Consolidated net income for SSNB and SSMC exceeded \$16 million for 1998, and the capital position of both is strong. For 1998, SSMC earned \$1.1 million, and assets totaled \$53 million on December 31, 1998. Intense competition continues to be provided by larger regional and multinational banks in addition to other local institutions. Primary competitors include: Bank America, Chevy Chase Bank, First Union National Bank, Crestar, Annapolis National Bank, and the First National Bank of Maryland.

Description of Assessment Area

SSNB has defined two separate assessment areas. The larger AA, or AA1, which is located around the older bank in Montgomery County, consists of the entire Maryland counties of Montgomery and Howard, and the 17 most northwesterly census tracts in Prince George’s County. The newer AA, or AA2, resulting from the bank’s purchase of another bank in Annapolis, Maryland in 1996, is west of larger AA1, and consists of 41 census tracts in the middle of Anne Arundel County. The counties of Howard and Anne Arundel are located in the Baltimore Metropolitan Statistical Area (“MSA”) 0720. The counties of Montgomery and Prince George’s are located in the Washington D.C. MSA 8840. These two MSAs are part of the Consolidated MSA (“CMSA”) of Washington, D.C. and Baltimore, Maryland. The combined AA covers 247 whole census tracts, and is located entirely within the Washington, D.C. and Baltimore, Maryland CMSA.

The combined AAs had a population of 1.2 million in 1997. The significant majority of the local employment opportunities are in the government, retail, and service industries, with other employment in the construction, finance, and manufacturing sectors. The U.S. Department of Housing and Urban Development (“HUD”) estimated 1998 median family income for AA1 was \$69,950 and \$55,600 for AA2. Housing units total 483 thousand, of which 72% are one-to-four family units. Owner-occupied housing is 65% of the total housing stock, renter-occupied housing is 30%, and vacant housing accounts for 5% of the total. The median housing value was \$194 thousand.

The AAs meet regulatory guidelines and do not arbitrarily exclude any low- or moderate- income (“LMI”) neighborhoods. The local and national economy is performing well. It continues to benefit from strong economic growth, and low unemployment, inflation, and interest rates.

Recently completed community contacts for the AAs reveal the following credit needs: business financing for small and early stage businesses; community development loans; and flexible financing products for the consumer, especially as it relates to affordable housing. The three community contacts represent housing, economic development, and cooperative business interests.

According to data from the 1990 U.S. Census, the following table reflects the demographics and income characteristics of the bank's combined AAs:

COMBINED ASSESSMENT AREA DEMOGRAPHICS				
<i>Designation</i>	<i>#Census Tracts</i>	<i>% of Total Census Tracts</i>	<i>Level of Family Income</i>	<i>% Owner Occupied Housing Units</i>
Low	1	.4%	10.8%	0.0%
Moderate	24	9.7%	14.4%	4.9%
Middle	95	38.5%	22.8%	35.2%
Upper	125	50.6%	52.0%	59.9%
N/A*	2	.8%	0.0%	0.0%
TOTAL	247	100.0%	100.0%	100.0%

*Income not reported

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Scope of Review

This review covered the time period from January 1, 1997 through December 31, 1998 for all Home Mortgage Disclosure Act (“HMDA”)-reportable loan originations, qualified investments, and services. The January 1, 1997 through September 30, 1998 review period for small business, small farm, and community development loan originations covered a shorter time period because the data for the fourth quarter had not been compiled by management. Bank management requested that this analysis include loan origination activity for the review period by SSMC, a bank *subsidiary*. The bank’s two assessment areas have been combined for analysis purposes.

LENDING TEST

Performance Criteria

Lending Activity

The bank’s level of lending, including that of bank subsidiary Sandy Spring Mortgage Corporation, for the review period was strong. The number of loan originations in both entities totaled 2,802 and the dollars of loan originated totaled ***\$443 million, which equated to a strong 40% of average assets*** for the years 1997 and 1998.

By itself, SSMC originated 1,691 for \$306.3 million of HMDA-reportable loans inside the bank’s AAs. The 1997 activity of SSMC, combined with that of SSNB, placed it as the 29th (out of 600) most active residential mortgage lender in a very competitive market. Market share totaled 1.16% (information based on 1998 HMDA data is not available). SSNB originated or purchased an additional 348 residential real estate loans for \$64.6 million, 758 small business loans for \$71.9 million, and five small farm loans for \$168 thousand.

Concentration in the Assessment Areas

As indicated in the next table, SSNB originated a high percentage of its Community Reinvestment Act-reviewed loans in the AAs.

LOAN ORIGINATIONS BY PRODUCT TYPE IN THE COMBINED ASSESSMENT AREAS DURING THE EVALUATION PERIOD				
LOAN TYPE	# LOANS	% of TOTAL	\$ (000s)	% of TOTAL
Small Business	758	84.8%	71,913	81.8%
Small Farm	5	100.0%	168	100.0%
HMDA	348	63.0%	64,588	73.7%
TOTAL	1,111	77.6%	136,669	78.0%

Geographic Distribution of Loans

Over the review period, the geographic distribution of loans originated reflects good penetration of LMI census tracts.

The next table shows excellent geographic penetration of LMI census tracts of HMDA-reportable loans originated by both SSNB and SSMC when compared to 1997 HMDA data. The combined entities originated 4.3% of their total HMDA loans in low income and 13.7% in moderate income census tracts. In comparison, there are no owner-occupied housing units in low income census tracts and only 4.9% of the total owner-occupied housing units in the AAs are located in moderate census tracts.

SSNB AND SSMC HMDA LOAN GEOGRAPHIC PENETRATION BY CENSUS TRACTS			
<i>Designation</i>	<i>% Owner Occupied Housing Units</i>	<i>% of Subsidiary Loans</i>	<i>% of Bank Loans</i>
Low	0.0%	4.3%	4.0%
Moderate	4.9%	14.3%	11.2%
Middle	35.2%	26.1%	21.8%
Upper	59.9%	51.2%	58.6%
N/A*	0.0%	4.1%	4.4%
TOTAL	100.0%	100.0%	100.0%

***Income not reported**

Small business and small farm lending patterns reflect adequate penetration of LMI census tracts. While 13.1% of all small businesses and small farms in the AAs are located in LMI census tracts, only 11.7% of all lender originations in 1997 were made to businesses located there. Bank penetration levels of 9.2% trailed the peer.

SMALL BUSINESS AND SMALL FARM LOAN GEOGRAPHIC PENETRATION BY CENSUS TRACTS*				
<i>Designation</i>	<i># of Small Businesses and Farms in Census Tracts</i>	<i>% of Total Census Tracts</i>	<i># and % of All Lenders' 1997 Loans</i>	<i># and % of Loans in Census Tracts</i>
Low	869	2.1%	230/1.7%	2/.3%
Moderate	4,580	11.0%	1,325/10.0%	68/8.9%
Middle	15,999	38.4%	5,272/39.9%	342/44.8%
Upper	20,225	48.5%	6,376/48.4%	351/46.0%
TOTAL	41,673	100.0%	13,203/100%	763/100%

***Small farm originations are combined with small business loan originations due to limited activity.**

****Income not reported**

Borrowers' Profile

Small business loans originated during the evaluation period indicate a good distribution among business borrowers of different sizes. HMDA loan originations reflect adequate penetration among retail borrowers of different income levels.

Small Business Lending

The bank's distribution of lending to small businesses *by revenue size* of the business reflects good lending penetration patterns. Approximately 73% of reported non-farm businesses in the AAs show revenues of \$1 million or less. Over the evaluation period, the bank extended 71% of the number of loan originations and 57% of the dollar volume to business borrowers with revenues of \$1 million or less. This lending pattern compares very favorably to 1997 Small Business Lending Data that shows

only 39% of the number of loans and 36% of the dollar volume of loans were originated in the AAs to borrowers with revenues of \$1 million or less.

The bank’s distribution of business lending *by size of loan* reflects a good level of small business loan originations. For the evaluation period, almost 91% of the number of loan originations and 52% of the dollar volume was extended to business borrowers in amounts less than \$250 thousand. This lending pattern compares favorably to the 1997 Small Business Lending Data that shows 95% of the number of loans and 49% of the dollar volume of loans were originated in the AAs to borrowers in amounts less than \$250 thousand. The table below shows the distribution of small business loan originations by size of loan within the AAs:

Distribution of Small Business Loans by Size of Loan within the Assessment Areas		
Size of Loan	# of Loans/%	(000s) \$ Amt/%
< \$100 Thousand	590/77.8%	20,536/28.6%
\$100 Thousand to < \$250 Thousand	98/12.9%	16,787/23.3%
> \$250 Thousand to \$1 Million	70/9.3%	34,590/48.1%
TOTAL	758/100%	71,913/100%

Small Farm Lending

SSNB provides nominal lending to small farms. All five loan originations totaled only \$168 thousand. All loans originated for less than \$110 thousand, and were granted to borrowers with revenues of \$1 million or less.

Subsidiary HMDA Lending Activities

SSMC has a short two year history of originating residential real estate loan products. Loan originations for the evaluation period were as follows:

Borrower Characteristics of Affiliate HMDA Loans within the Assessment Areas					
Income Levels	1997		1998		% of Families within each Income Level
	# Loans / %	(000s) \$ Amt / %	# Loans / %	(000s) \$ Amt / %	
Low	23/5%	1,801/2%	50/4%	4,707/2%	10.8%
Moderate	61/13%	6,857/8%	180/15%	20,952/10%	14.4%
Middle	122/26%	18,046/21%	319/26%	45,847/21%	22.8%
Upper	255/54%	57,464/66%	611/50%	139,745/63%	52.0%
N/A*	12/2%	2,297/3%	58/5%	8,560/4%	
Total	473/100%	86,465/100%	1,218/100%	219,811/ 100%	100.0%

***Income not reported**

SSMC originated or purchased 1,691 residential real estate loans in the AAs, which represents 74% of all loans originated. The table above shows the SSMC made an adequate number of loans (18.6%) to low- and moderate-income families in the AAs when compared to the number of LMI families in the AAs (25.2%) and the limited opportunities to lend on LMI owner-occupied units.

SSNB Residential Real Estate Mortgage Lending Activities

Loans secured by real estate account for the majority of the bank's outstanding loan portfolio at 83.2%.

This portfolio contains various types of real estate loans, including construction and permanent mortgage loans. From the bank's 1997 and 1998 HMDA-Loan Application Registers, SSNB originated or purchased 348 residential real estate loans in the AAs, which represents 63% of all loans originated. The table below shows the bank made an adequate number of loans (15.0%) to low- and moderate-income families in the AAs when compared the number of LMI families in the AAs (25.2%) and the limited opportunities to lend on LMI owner-occupied units.

Borrower Characteristics of Bank HMDA Loans within the Assessment Areas					
Income Levels	1997		1998		% of Families within each Income Level
	# Loans / %	(000s) \$ Amt / %	# Loans / %	(000s) \$ Amt / %	
Low	7/7%	647/3%	7/3%	782/2%	10.8%
Moderate	12/12%	1,154/6%	27/11%	3,268/7%	14.4%
Middle	17/17%	2,456/13%	59/24%	7,337/16%	22.8%
Upper	59/59%	13,803/73%	145/58%	30,684/67%	52.0%
N/A*	5/5%	952/5%	10/4%	3,505/8%	--
TOTAL	100/100%	19,012/100%	248/100%	45,576/100%	100.0%

*Income not reported

Community Development Lending Activities

The Bank has originated an adequate level of community development loans. Based upon bank-generated reports and a review of bank files, SSNB originated two community development loans over the review period totaling \$2.0 million. Both borrowings support multifamily apartment buildings focused on affordable housing options that are subject to rent controls.

Innovative or Flexible Lending Practices

While SSNB offers a broad array of credit products, and continues to develop products to meet the needs of its customer base, management reports limited use of innovative and/or flexible lending practices in order to serve the AAs credit needs. SSNB and SSMC offer two notable flexible lending programs. First, the "80/10/10 Program" is designed to not only reduce the down payment requirements on residential mortgage loans, but also eliminates costly private mortgage insurance.

SSNB and SSMC originated 95 loans totaling \$3 million for 1997 and the first nine months of 1998. Second, for first time home buyers, SSMC offers several low down payment residential mortgage loans with more flexible credit underwriting standards than other products that are underwritten to secondary market standards. Management started tracking originations for this program in early 1999 **therefore there is no specific data on originations under this program for the review period.**

INVESTMENT TEST

The bank's level of qualified investments is adequate based on identified needs in the AAs and available opportunities to address these needs. There are a limited number of opportunities that are available within the AAs to participate in the purchase of investments. Neither the state of Maryland nor the municipalities within the AAs have issued any qualifying investment securities in recent years. There are no mortgage-backed securities with mortgages either located in LMI areas or originated to LMI borrowers. To address the need for affordable housing loans in the AAs, SSNB developed a program in 1998 to create and allow the bank to purchase investments that address LMI housing needs in the AAs and an extended statewide area that includes the AAs. SSNB anticipates purchasing the first investments under this program in the first half of 1999.

During the review period, SSNB has made \$703 thousand in qualified investments and grants. Targeted groups included small businesses, affordable housing, and homeless care.

The bank provided 41 donations and grants totaling \$102.7 thousand to a variety of local organizations that provide affordable housing and community services to LMI individuals. Some of these donations were specifically targeted for assistance to the homeless population in the AAs. Details of some donations and grants follow:

- < In 1998, the bank created a benevolent fund to help support LMI individuals at an elder care facility in Montgomery County. This \$25 thousand donation enables LMI individuals to stay in the facility after their funds for care have been exhausted, an innovative means of assisting the housing needs of LMI individuals in the AAs.
- < The bank made donations of \$4.7 thousand to an organization dedicated to ensuring that adequate and affordable housing is available in the AAs. The donations supported home buying seminars for LMI individuals.
- < SSNB donated \$6.5 thousand to an organization that provides home improvements to LMI households in Howard, Montgomery, and Anne Arundel counties.
- < In 1998, SSNB invested \$500 thousand in a certificate of deposit at a minority-owned financial

institution headquartered in Washington, D.C. that lends principally to small businesses and consumers in LMI neighborhoods. SSNB also invested \$100 thousand in a certificate of deposit at another minority-owned financial institution headquartered in Prince George’s County, Maryland that lends principally to small business and consumers in LMI areas.

In 1998, the bank created a Strategic Giving Plan to better target opportunities and develop consistency in corporate giving. The draft of the plan indicates that at least 20% of all giving should be targeted to CRA-qualified opportunities. The committee showed its positive influence in 1998 as qualified grants and donations increased 77% compared to 1997.

SERVICE TEST

SSNB’s delivery systems are accessible **to geographies and individuals of different income** levels in its AAs. The bank’s record of opening or closing offices has improved the accessibility to bank services, particularly in LMI geographies. Branch hours are reasonable and convenient to customers. As reflected in the table below, 10% of the bank’s full service offices and 25% of the remote ATMs are located in moderate-income census tracts.

Overall, the bank’s branch distribution reflects the geographies of the AAs. The table below reflects the full service branch office and ATM network within the various census tracts:

Distribution of Delivery Systems (Branches and Remote ATM Facilities)			
	<i>Full Service Branches</i>	<i>Remote ATM Facilities</i>	<i>Population by Census Tract</i>
<i>Census Tracts</i>	<i># / %</i>	<i># / %</i>	<i>%</i>
Low	0/0%	0/0%	.2%
Moderate	2/10%	2/25%	9.8%
Middle	10/50%	4/50%	37.3%
Upper	8/40%	1/13%	52.7%
N/A	0/0%	1/12%*	0.0%

TOTAL	20/100%	8/100%	100.0%
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* This is a newly acquired Mobile Unit that will visit the AAs

The bank's distribution of branches in LMI geographies mirrors the distribution of population by census tracts in the AAs, and the penetration of remote ATMs in the moderate-income census tracts significantly exceeds the percentage of LMI population by census tracts in the AAs. Since 1996, the bank has opened three new branches and five remote ATM locations. Of these eight locations, two (25%) were located in upper-income census tracts, five (62.5%) in middle-income census tracts, and one ATM (12.5%) in a moderate-income census tract. Additionally, the bank relocated one branch to a more accessible location in a moderate-income census tract. Currently, the bank has approval to open a branch at Montgomery General Hospital, located in an upper-income census tract, which would expand the services currently offered there through remote ATMs. According to bank management, the majority of the hospital's employees have incomes that would be considered LMI. The bank acquired a mobile ATM unit in 1998. This unit is able to provide banking services throughout the AAs including LMI areas.

Most branches are open from 9AM to 3PM, Monday through Thursday, and Friday hours are 9AM to 7PM. All branches, except four, are open Saturday from 9AM to 12PM, and drive-in windows are open 7:30AM to 7PM, Monday through Friday. Both branches in moderate-income census tracts conform to the hours of the other branches.

The bank offers a common set of financial services to all of its customers. SSNB offers a 24 hour telephone system that provides customers with a toll-free number which can be used to apply for loans and obtain other services without visiting a branch location. Telephone banking allows customers to obtain account information, transfer funds, and obtain current rates through the automated system. In addition, a customer may access the Customer Service Center from this site during business hours. The *Young Savers* program, developed in 1993, allows children to become familiar with deposit services by using a special window in the branch.

The *BankXpress* (PC Banking) product allows customers to check account balances, pay bills without writing checks, and transfer money between SSNB accounts, as well as accounts at many other financial institutions through a secure Internet accessible site. The bank maintains a website at <http://www.ssnb.com>. Information provided at the site includes branch locations, telephone numbers and hours, a history of the institution, and a description of services offered. In drawing conclusions on the Service Test, we placed little reliance on these two alternative delivery systems because the bank can not provide information on how these systems are available and effective in delivering banking services to LMI census tracts and LMI individuals.

Community Development Services

SSNB provides a good level of community development services. Primary services include providing standard financial services and providing technical financial assistance for consumers and small businesses. In April 1998, the bank received a Commissioners Award from The Housing Opportunities Commission of Montgomery County, Maryland for special recognition of support and commitment to the county's residents. This was awarded for the bank's involvement in a variety of projects that contributed to providing affordable housing to LMI individuals in Montgomery County.

Officers and directors from SSNB serve in varying capacities, including board members, for a number of not-for-profit organizations in the AAs. Examples include:

- < Financial counseling for Howard County Extension Service that offers free money management help through its offices in Howard County. The service provides assistance in managing credit, maintaining records, budgeting, savings and insurance. The services are free and aimed at LMI individuals.
- < Director of the Howard County Christmas in April. The organization's goal is to provide and improve housing conditions for low-income individuals in Howard County.
- < Director/Treasurer of Montgomery Housing Partnership. The goal of the organization is to provide affordable housing through both rental units and purchases for LMI individuals.
- < Director of Resource Sharing Network of Housing Opportunities Commission, a non-profit dedicated to assisting public housing residents as they work toward upward mobility and self-sufficiency.
- < Director of Home Builder Care Foundation. The goal of the organization is to provide construction assistance to LMI individuals of various needs in the AAs as well as a broader regional area that encompasses the AAs.
- < Director of Salvation Army of Annapolis, Maryland, a non-profit organization aimed at providing day care, food distribution, and housing assistance to LMI individuals of Anne Arundel County.
- < Director of Maryland Energy Assistance Program, an organization that provides assistance to LMI individuals with funds for electric and heating expenses.

FAIR LENDING EXAMINATION

A concurrent fair lending review involved a comparative loan file review analysis. The sample selection was obtained from the transactions reflected on the 1997 and YTD 9/30/98 HMDA-LARs. The

product choice was conventional, 1-4 family home purchase loans. The control group was joint, white borrowers versus the prohibited basis group defined as single, white female borrowers. We did not identify violations of the substantive provisions of anti-discrimination laws and regulations. SSNB has an effective system in place to comply with fair lending laws and regulations.

Appendix A: Scope of Examination

Time Period Reviewed:	January 1, 1997 through December 31, 1998 (with exception of Small Business and Farm Lending)
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Financial Institution: Sandy Spring National Bank of Maryland	Products Reviewed: Small business, small farm, and home mortgage loans
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Affiliate:	Affiliate Relationship:	Products Reviewed:
Sandy Spring Mortgage Corporation	Subsidiary	Home Mortgage Loans

List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited	Other Information
Includes portions of Washington, D.C. MSA #8840 and portions of Baltimore MSA #0720	On-Site	Main Office	None