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Comptroller of the Currency  
Administrator of National Banks

LARGE BANK

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## **Public Disclosure**

**May 15, 2000**

### **Community Reinvestment Act Performance Evaluation**

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

**2623 13<sup>th</sup> Street  
Columbus, Nebraska 68601**

**Office of the Comptroller of the Currency**

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**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.**

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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(LMI) 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 **First National Bank and Trust Company of Columbus, Nebraska** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **May 15, 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 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 with 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) dwelling loans, loans for the purchase of manufactured homes and refinancings 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, branch openings and closings).

**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 Loans to Businesses** - 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 Loans to Farms** - 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 **First National Bank and Trust Company of Columbus (FNB&T)** with respect to the Lending, Investment, and Service Tests:

<b>Performance Levels</b>	First National Bank & Trust Company of Columbus 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 main factors that support this rating include:

- FNB&T's lending levels reflect a good responsiveness to the credit needs of the Columbus assessment area (AA). The bank reported the largest number and dollar volume of small loans to businesses and farms in the Columbus AA. In addition, FNB&T's market share of the dollar volume of small loans to businesses (37%) and farms (44%) compares reasonably with the bank's dollar volume deposit market share (48%) in Platte County, Nebraska.
- FNB&T's overall record of lending to borrowers with different incomes is good. The bank achieved an excellent penetration of lending to moderate-income borrowers for home purchase loans and an adequate distribution for home mortgage refinance loans. In addition, FNB&T has an excellent record of providing small loans to businesses of different sizes and a good distribution for small loans to farms.
- FNB&T provided an adequate level of qualified community development (CD) investments during the evaluation period. This assessment accounts for the Columbus AA's CD needs and opportunities and the bank's capacity to help address those needs.
- FNB&T's delivery systems are reasonably accessible to individuals of different income levels in the AA and bank personnel provided a relatively high level of CD services.

## Description of the Institution

First National Bank and Trust Company of Columbus, Nebraska (FNB&T) is a \$409 million financial institution headquartered in Columbus, Nebraska. FNB&T is a subsidiary of First National of Nebraska, Inc. (FNNI), an \$8.6 billion multi-bank holding company headquartered in Omaha, Nebraska. FNNI owns two trust companies, five banks in Nebraska, three banks in Colorado, one bank in South Dakota, and one bank in Kansas. FNB&T operates the main bank, one branch and twelve automated teller machines (ATMs) in the Columbus AA. In addition, the bank operates two branches and three ATMs in the Norfolk AA. All of FNB&T's offices and ATMs are located in the bank's AAs, which consist of 11 block numbering areas (BNAs) in Butler, Colfax, Platte, and Polk Counties, Nebraska (Columbus AA) and 6 BNAs in Madison County, Nebraska (Norfolk AA). FNB&T did not conduct any merger or acquisition activity during the CRA evaluation period.

FNB&T offers a full range of banking services. There are no known legal or financial impediments that hinder the bank's ability to help meet the credit needs of its AA. FNB&T's loan portfolio is heavily influenced by credit card participations purchased from an affiliate. However, we did not consider these receivables during the CRA examination since credit card lending is national in scope and this activity has not hindered the bank's ability to lend and invest in the AAs. We instead focused on the bank's lending activities in the AAs. Excluding credit card receivables, the bank primarily emphasizes agricultural and commercial loans. As of December 31, 1999 the bank's loan portfolio by dollar volume consisted of 45% credit card receivables; 25% agricultural and agricultural real estate loans; 16% commercial and commercial real estate loans; 7% residential real estate loans, including multi-family; 6% consumer loans; 1% other loans. FNB&T's net loans represented 86% of deposits and 77% of total assets. In addition, the bank had Tier 1 capital of \$30.5 million and 1999 net income of \$5.6 million. FNB&T sells a significant portion of its home purchase and home mortgage refinance loans on the secondary market. From January 1, 1997 through December 31, 1999, the bank originated and sold 653 residential mortgage loans totaling \$47.2 million. Although these loans are not reflected in the above loan portfolio ratios, the number and dollar volume that were originated and purchased in the AAs are included in the mortgage loan totals in the tables in Appendix C.

FNB&T received an "Outstanding" rating during the previous CRA examination, dated March 21, 1997. The rating assigned during this examination does not reflect a decline in CRA performance. Rather, we evaluated the bank under the revised CRA regulation at this examination.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB&T's CRA performance using the FFIEC Interagency Large Bank CRA Examination Procedures, pursuant to the revised CRA regulation. The evaluation included analyses of the bank's lending, investment, and service activities. Our lending evaluation included home mortgage loans, small loans to businesses, and small loans to farms. The bank did not report any community development loans during this evaluation period.

- We reviewed data for small loans to businesses and farms collected by the bank from January 1, 1997 through December 31, 1999.
- We reviewed home mortgage data from January 1, 1998 through December 31, 1999. FNB&T voluntarily collected data for home purchase, home improvement, and home mortgage refinance loans even though the bank is not a Home Mortgage Disclosure Act (HMDA) reporter. However, the bank did not break down data by loan purpose for calendar year 1997. We included 1997 data in Table 1 of Appendix C in aggregate only. Therefore, we based our analyses of the geographic and borrower distributions of home purchase, home improvement, and home mortgage refinance loans on originations and purchases from calendar years 1998 and 1999 only.
- We compared FNB&T to other lenders in the bank's AA by reviewing 1998 market share loan data for small loans to businesses and small loans to farms. We were unable to perform market comparisons for mortgage loans since the bank is not a HMDA reporter.
- We used demographic data from the 1990 U.S. Census to compare the bank's lending performance to the potential opportunities in its AA. Refer to the Market Profile in Appendix B for details on demographic data.
- We analyzed FNB&T's community development investments and service activities from March 21, 1997 through May 15, 2000. We considered the number and types of qualified investments, branch locations and accessibility, alternative service delivery systems, and community development services.
- We used deposit information, annually reported to the Federal Deposit Insurance Corporation, to determine FNB&T's deposit market share and market presence relative to other financial institutions in its AA. The most recent deposit information available was as of June 30, 1999.

**Data Integrity**

Loan data for home mortgage loans, small loans to businesses, and small loans to farms for 1997, 1998, and 1999 is accurate. In June 1999, we sampled home mortgage data and small loans to businesses and farms reported for 1998. During this review, we found mortgage data accurate, but we identified significant data reporting errors in small loans to businesses and farms. These errors also impacted the 1997 data, since the same data collection and reporting processes were in place. FNB&T corrected reporting errors in the 1997 and 1998 small loans to businesses and farms data and ensured the 1999 data was collected and reported correctly. We performed a follow-up data integrity examination in May 2000 and found the adjusted data for 1997 and 1998 small loans to businesses and farms accurate. We also found the 1999 data for small loans to businesses and farms accurate.

**Selection of Area for Full-Scope Review**

We performed a full-scope review of FNB&T's Columbus AA since this area represented 80% of the bank's deposits and 85% of lending activity during the evaluation period. We performed a limited-scope review of the bank's Norfolk AA since this area represented only 20% of the bank's deposits and 15% of lending activity during the evaluation period.

**Ratings**

The bank's overall rating is based primarily on the area that received a full-scope review. We weighted the bank's performance in making small loans to farms and businesses more heavily than the bank's record of making home mortgage loans due to the greater number and dollar volume of business and farm loans during the evaluation period. We did not place any weight on FNB&T's record of making home improvement loans since the bank had only thirteen such loans in the AAs from January 1, 1998 through December 31, 1999.

**Community Contacts**

We performed two community contacts during this CRA evaluation and reviewed eight other contacts completed in the Columbus AA since the last CRA examination. These contacts included three city offices, two economic development entities, two housing entities, two businesses, and one community action group.

Results of the community contacts were mixed with most in the city of Columbus identifying a need for more retail businesses and most contacts in other areas of the AA identifying a need for affordable housing. None of the contacts identified a strong need for any one type of credit. Most feel the Columbus AA economy is strong and that local banks adequately meet area credit needs. Refer to the Market Profile in Appendix B for additional information regarding AA CD needs and opportunities.

## **Fair Lending Review**

We did not identify any substantive violations of anti-discrimination laws. Our fair lending review consisted of comparing rates and terms offered to approved individual female applicants and approved individual male applicants for automobile purchase loans originated from April 1, 1999 through July 1, 1999. We performed the fair lending examination in July 1999 during the consumer compliance examination. We did not identify any evidence of differential treatment in rates or terms offered on the basis of gender in the loans reviewed.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

FNB&T's performance under the Lending Test is rated "High Satisfactory." Based on a full-scope review, the bank's lending performance in the Columbus AA is good.

#### **Lending Activity**

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

FNB&T's lending levels reflect a good responsiveness to AA credit needs. FNB&T reported the largest number and dollar volume of small loans to businesses and farms in the Columbus AA during 1998, the most recent year for which aggregate data is available. The bank reported 1.8 times as many small loans to businesses and 2.7 times as many small loans to farms as the number two ranked reporter in the Columbus AA. FNB&T reported 30% of the number and 37% of the dollar volume of small loans to businesses in the Columbus AA. In addition, the bank reported 43% of the number and 44% of the dollar volume of small loans to farms in the AA. These percentages are reasonable and in line with the bank's 48% deposit market share in Platte County. No market share information is available for mortgage loans since the bank is not a HMDA reporter.

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

An analysis of the distribution of loans by income level of the geography is not meaningful since all significant BNAs in the AA are middle- or upper-income. The AA includes only one low-income BNA and no moderate-income BNAs. The low-income BNA contains only thirty-one people, five LMI families, eleven owner-occupied housing units, zero businesses, and zero farms.

Refer to the Market Profile in Appendix B for additional information.

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

There were no conspicuous gaps in the bank's home purchase loans, home mortgage refinance loans, small loans to businesses, or small loans to farms. We reviewed summary lending reports which revealed that the bank made loans in virtually every tract in the Columbus AA. We did not consider the bank's penetration of home improvement loans since the volume of this category of lending was insignificant to our analysis.

***Inside/Outside Ratio***

FNB&T originated and purchased a high percentage of the number of home purchase loans, home mortgage refinance loans, small loans to businesses, and small loans to farms in the bank's AAs during the evaluation period. FNB&T originated or purchased 77% of all loans reviewed for CRA in its AAs. More specifically, the bank made 81% of home purchase loans, 87% of home mortgage refinance loans, 88% of small loans to businesses, and 71% of small loans to farms within the AAs. We did not consider home improvement loans in this analysis since the volume of lending in this category was insignificant to our evaluation.

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

FNB&T's record of lending to borrowers of different income levels reflects an overall good distribution for home mortgage loans and small loans to businesses and farms.

We factored in the difficulties that the bank faces in making home mortgage loans to low-income borrowers when evaluating FNB&T's performance. Primary among these is the cost of housing in Columbus. Information available from local realtors reveals that a typical home sells for over \$90,000 in Columbus. This amount is well over the level that low-income individuals could afford to pay. We also considered demographic data that reveals that 7% of low-income families in the Columbus AA are below the poverty level. These families would have an especially difficult time purchasing a home in the AA. Refer to the Market Profile in Appendix B for additional information.

***Home Mortgage Loans***

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

The bank's overall borrower distribution of home mortgage loans is good.

FNB&T's home purchase loan borrower distribution is excellent. The percentage of the number of the bank's home purchase loans to moderate-income borrowers is 1.6 times the percentage of moderate-income families in the AA. The bank's percentage of home purchase loans to low-income borrowers (5%) was below the percentage of low-income families (12%). However, this statistic is mitigated by cost of housing and poverty level factors previously discussed in this document.

We did not consider the bank's borrower distribution of home improvement loans due to the low volume of activity for this loan category. FNB&T originated or purchased only eight home improvement loans in the Columbus AA during the evaluation period.

FNB&T's home mortgage refinance loan borrower distribution is adequate. The bank's percentage of the number of home mortgage refinance loans to moderate-income borrowers (12%) was below the percentage of moderate-income families (18%). The bank's percentage of home mortgage refinance loans to low-income borrowers (3%) was also below the percentage of low-income families (12%). However, these distributions are adequate given the cost of housing and the family poverty level in the Columbus AA.

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

Refer to Table 10 of Appendix C for facts and data used to evaluate the borrower income distribution of the bank's originations and purchases of small loans to businesses.

FNB&T's record of lending to businesses with revenues of different sizes is excellent. The bank's market share of small loans to businesses with revenues of \$1 million or less (36%) is larger than the bank's overall market share of small loans to businesses (30%). In addition, FNB&T originated 88% of its small loans to businesses in amounts of \$100,000 or less. Also, the bank extended 83% of the number of small loans to businesses to borrowers with gross annual revenues of \$1 million or less. This percentage is larger than the percentage of businesses (75%) in the AA that report revenues of \$1 million or less.

### ***Small Loans to Farms***

Refer to Table 11 in Appendix C for facts and data used to evaluate the borrower income distribution of the bank's originations and purchases of small loans to farms.

FNB&T's record of lending to farms with revenues of different sizes is good. The bank's market share of small loans to farms with revenues of \$1 million or less (44%) slightly exceeded the bank's overall market share of small loans to farms (43%). In addition, FNB&T originated 85% of its small loans to farms were originated in amounts of \$100,000 or less. Also, the bank extended 91% of the number of small loans to farms with gross annual revenues of \$1 million or less. This percentage is lower than, but compares favorably with the percentage of farms (96%) in the AA that report revenues of \$1 million or less.

## **Community Development Lending**

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

## **Product Innovation and Flexibility**

Bank products had a positive impact on the Lending Test conclusions for the Columbus AA. Product offerings are not considered innovative. However, they are flexible in their terms and underwriting.

FNB&T offers home mortgage loans under the Nebraska Investment Finance Authority (NIFA) program and under the United States Department of Agriculture, Rural Development (RD) program. These programs are primarily designed to facilitate the origination of home mortgage loans to LMI individuals, by offering low down-payments and below-market rate mortgages. During 1997, 1998, and 1999, FNB&T originated 106 loans under these programs, totaling \$6.0 million in the Columbus AA. These loan totals are already included in the mortgage loan data in Appendix C.

FNB&T also began offering home purchase loans under two programs offered by the Federal Home Loan Bank Board in March 2000. These programs provide last-position mortgage loans to assist LMI borrowers with closing costs or repairs. These mortgages are forgiven after five years of home ownership. FNB&T has originated six mortgages totaling \$275,050, with total last-place forgivable mortgages of \$24,995 under these programs since inception. We did not include these loans in the mortgage data in Appendix C since they were originated subsequent to the end of the Lending Test evaluation period.

## **Conclusions for Area Receiving Limited-Scope Review**

Refer to Tables 1 through 11 in Appendix C for facts and data used to evaluate the bank's lending performance in the Norfolk AA.

Based on a limited-scope review, FNB&T's performance in the Norfolk AA is not inconsistent with the bank's overall lending test rating of "High Satisfactory."

## **INVESTMENT TEST**

### **Conclusions for Area Receiving Full-Scope Review**

FNB&T's performance under the Investment Test is rated "Low Satisfactory."

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

Based on a full-scope review, the bank's performance in the Columbus AA is adequate. Qualifying CD investments can be in either the form of grants or investment securities. During the evaluation period, FNB&T made qualified donations to four CD organizations and received credit for affiliate donations to one CD organization. All donations for the Columbus AA totaled \$185,291. The bank did not purchase any qualified investment securities. However, we identified only limited qualified investment securities in the AA during the evaluation period. The volume of qualified investments is adequate, given the low level of CD needs and opportunities in the AA. Refer to the Market Profile in Appendix B for additional information regarding AA CD needs and opportunities.

The following is a list of the most significant CD donations provided during the evaluation period. We do not consider any of these donations innovative or complex.

- \$21,330 in donations to four entities that provide community development services to LMI individuals.
- \$163,961 in donations to an organization that provides financial counseling to LMI individuals. This organization serves a broader regional area that includes the bank's Columbus AA.

### **Conclusions for Area Receiving Limited-Scope Review**

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

Based on a limited-scope review, FNB&T's performance in the Norfolk AA is not inconsistent with the bank's overall investment test rating of "Low Satisfactory."

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated “High Satisfactory.”

### **Retail Banking Services**

Refer to Table 13 in Appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNB&T's delivery systems are reasonably accessible to individuals of different income levels in the AA. An analysis of the distribution of the bank's branches by geographic income is not meaningful since the AA includes only one low-income BNA with no branch placement opportunities, and no moderate-income BNAs. However, a map of FNB&T's offices revealed that there are no significant gaps in branch locations that would negatively impact LMI individuals in the AA. Sixty-six percent of LMI families in the Columbus AA reside in either the BNAs where the bank's branches are located or in adjoining BNAs. The bank has not opened or closed any branches in the Columbus AA since the last CRA examination. Refer to the Market Profile in Appendix B for additional information regarding the low-income BNA.

FNB&T offers reasonable services and business hours throughout the AA. The bank operates two full service branches in the Columbus AA. Both offices have Saturday morning hours and convenient hours throughout the week. In addition, the main bank lobby is open until 8 P.M. on Thursdays.

FNB&T also offers other delivery systems, which should help the bank reach a wide array of individuals throughout the AA. The bank offers Touch Tone Banking, a telephone banking service; banking services by mail; and twelve ATMs in the Columbus AA. The bank also offers a direct deposit service. Most of these delivery systems are available 24-hours a day, 7 days a week without customer usage fees. However, we did not place significant weight on alternative delivery systems since no data was available regarding the impact these services have had on the bank's record of reaching LMI individuals in the AA.

### **Community Development Services**

FNB&T provided a relatively high level of CD services during the evaluation period. In total, seven bank employees used their financial expertise to provide services to twelve CD organizations serving the Columbus AA. Bank personnel often acted in leadership capacities for economic development organizations, affordable housing entities and other groups that provide community services to LMI individuals in the AA.

The following is a list of the most significant CD services provided by the bank.

- Bank employees served in leadership capacities for two entities that promote economic development by promoting the Columbus AA to new businesses (including small businesses) or by providing financing of primarily small businesses. Bank employees provided financial services to these organizations by acting as a chairperson, a board member, and as member of a loan review committee. No information was available regarding the impact these services have had on the Columbus AA.
- A bank employee provided CD affordable housing financial services in three capacities in the Columbus AA. The employee is the Chairperson for a committee appointed by the Mayor of Columbus to oversee the city's use of grants for special loan programs for the rehabilitation of affordable housing. The employee also periodically provides affordable housing financial training for realtors in Columbus. Products discussed are designed for LMI individuals in the AA. The employee also holds affordable housing seminars annually for the general public. Financing options discussed are targeted to LMI individuals.
- Bank employees acted in leadership capacities for two organizations and provided financial services to four other entities that provide community services primarily for LMI individuals in the Columbus AA. FNB&T employees sat on boards, acted as Treasurers, and provided vital fundraising assistance for these entities.

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

Refer to Table 13 in Appendix C for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings in the Norfolk AA.

Based on a limited-scope review, FNB&T's performance in the Norfolk AA is not inconsistent with the bank's overall service test rating of "High Satisfactory."

## 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.

<b>Time Period Reviewed</b>	Lending Test (excluding CD Loans): 01/01/1997 to 12/31/1999 Investment and Service Tests and CD Loans: 03/21/1997 to 05/15/2000	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank & Trust Company of Columbus, Nebraska	Home Mortgage Loans, Small Loans to Businesses, Small Loans to Farms	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
First National Bank of Omaha	Affiliate Bank	Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Columbus	Full-Scope	The AA includes eleven BNAs in Butler, Colfax, Platte, and Polk Counties, Nebraska.
Norfolk	Limited Scope	The AA includes six BNAs in Madison County, Nebraska.

## Appendix B: Market Profile for Area Receiving Full-Scope Review

### Columbus Assessment Area

Demographic Information for Full-Scope Area: Columbus						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA** % of #
Geographies (Census Tracts/BNAs)	11	9%	NA	73%	18%	NA
Population by Geography	37,486	0%*	NA	74%	26%	NA
Owner-Occupied Housing by Geography	10,161	0%*	NA	75%	25%	NA
Businesses by Geography	1,661	0%*	NA	73%	27%	NA
Farms by Geography	521	0%*	NA	88%	12%	NA
Family Distribution by Income Level	10,132	12%	18%	26%	44%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,036	0%*	NA	80%	20%	NA
Median Family Income	= \$27,623	Median Housing Value				= \$45,724
HUD Adjusted Median Family Income for 1999	= \$39,800	Unemployment Rate (April 2000)				= 2.8%
Households Below the Poverty Level	= 9%					

Sources: 1990 U.S. Census, 1999 HUD updated MFI, and Nebraska Department of Labor unemployment data.

(\*) The low-income geography contains only 31 people, 11 owner-occupied housing units, 0 businesses, 0 farms, and 5 LMI families.

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

The Columbus AA is comprised of eleven BNAs in Butler, Colfax, Platte, and Polk Counties, Nebraska. Only one of the AA BNAs is low-income and none are moderate-income. We consider the low-income BNA insignificant to our CRA analysis since it contains only thirty-one people, five LMI families, eleven owner-occupied housing units, zero businesses, and zero farms. There are no opportunities to make small loans to businesses or farms and very limited opportunities to make mortgage loans.

Two of FNB&T's four offices and twelve of fifteen ATMs are located in the Columbus AA. In addition, 80% of the bank's deposits and 85% of the bank's loans analyzed during the CRA evaluation are from this area. Competition among financial institutions is strong. Thirteen other financial institutions operated sixteen banking offices in Platte County, the location of FNB&T's Columbus AA offices, as of June 30, 1999. FNB&T had 48% of the dollar volume of total deposits in Platte County as of June 30, 1999. Primary competitors include United Nebraska Bank; Columbus Bank and Trust Company; Columbus Federal Savings Bank; First Nebraska Bank; and Commercial Federal Bank, FSB. The economy in the AA is strong with an unemployment rate of 2.8%. Major employers in the area include: Appleton Electric, BD Medical Supplies, Behlen Manufacturing, Dale Electronics, Lindsay Manufacturing, and Magna-Lomason.

During the CRA evaluation, examiners performed two community contacts and reviewed eight other contacts completed in the Columbus AA since the last CRA examination. These contacts included three city offices, two economic development entities, two housing entities, two businesses, and one community action group.

Results of the community contacts were mixed with most in the city of Columbus identifying a need for more retail businesses and most contacts in other areas of the AA identifying a need for affordable housing. None of the contacts identified a strong need for any one type of credit. Most feel the Columbus AA economy is strong and that local banks adequately meet area credit needs.

A housing study was conducted in September 1997 in Columbus to assess the need for affordable housing. The Columbus Housing Market, A Study To Assess The Need For Affordable Housing (Study) revealed a minor shortage in overall housing units that normal residential development should cover. The Study also revealed that approximately 900 LMI households are in need of decent affordable housing. This conclusion was derived largely from community interviews that revealed that many elderly individuals live in under-maintained housing units. Therefore, the Study concluded that the highest priority should be the development of senior housing. However, the Study did not reveal any existing opportunities for partnerships to help develop senior housing.

Based on the demographics of the AA and identified affordable housing needs, unmet community development needs exist in the Columbus AA. However, opportunities for banks to help address these needs were limited during the evaluation period. Opportunities in the AA to make investments were largely in the form of donations. Even so, one Low-Income Housing Tax Credit (LIHTC) was available in the Columbus AA and statewide affordable housing bond issuances were available. According to the Nebraska Investment Finance Authority, during 1997, 1998, and 1999, LIHTCs available in FNB&T's Columbus AA totaled only \$81,830. In addition, the Nebraska Investment Finance Authority offered statewide affordable housing bonds. For example, a \$70 million statewide affordable housing revenue bond issuance was offered during 1999. This affordable housing bond was designed to provide a pool of money for the origination of mortgages to first-time home buyers with incomes and home purchase amounts below certain thresholds. However, we did not consider the statewide bond issuance an opportunity to invest in the Columbus AA because it was only indirectly responsive to local credit and community development needs.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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/assessment area.

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 Home Mortgage 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 Home Mortgage 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. The table also 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. The table also 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/assessment area. 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 investments 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 the MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME State: NEBRASKA												
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)			#
<b>Full-Scope:</b>												
Columbus	80%	625	\$45,920	998	\$60,984	2,267	\$126,177	0	\$0	3,890	\$233,081	85%
<b>Limited-Scope:</b>												
Norfolk	20%	102	\$8,922	436	\$28,016	109	\$4,315	0	\$0	647	\$41,253	15%

Sources: FFIEC CRA Aggregate and Disclosure Data for 1997, 1998, and 1999 for small loans to businesses and small loans to farms; bank records for mortgage and CD loans.

(\*) Federal Deposit Insurance Corporation 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, 1997 to December 31, 1999.

(\*\*\*) The evaluation period for Community Development Loans is March 21, 1997 to May 15, 2000.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE State: NEBRASKA Evaluation Period: January 1, 1997 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	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% Owner Occ Units	% BANK Loans	Overall	Low	Mod	Mid	Upper	#	% of Total	
<b>Full-Scope:</b>																			
Columbus	0%	0%	NA	NA	75%	70%	25%	30%	MARKET SHARE INFORMATION IS NOT AVAILABLE			MARKET SHARE INFORMATION IS NOT AVAILABLE			237	91%			
<b>Limited-Scope:</b>																			
Norfolk	NA	NA	NA	NA	72%	71%	28%	29%	MARKET SHARE INFORMATION IS NOT AVAILABLE			MARKET SHARE INFORMATION IS NOT AVAILABLE			24	9%			

(\*) Examiners analyzed the geographic distribution of home purchase loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect loan purpose data for calendar year 1997.

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

Geographic Distribution: HOME IMPROVEMENT State: NEBRASKA Evaluation Period: January 1, 1997 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	% Occ Units	% Owner Occ Units	% BANK Loans	% Occ Units	% Owner Occ Units	% BANK Loans	% Occ Units	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Upper	#	% of Total	
<b>Full-Scope:</b>																			
Columbus	0%	0%	NA	75%	87%	25%	13%	MARKET SHARE INFORMATION IS NOT AVAILABLE										8	62%
<b>Limited-Scope:</b>																			
Norfolk	NA	NA	NA	72%	80%	28%	20%	MARKET SHARE INFORMATION IS NOT AVAILABLE										5	38%

(\*) Examiners analyzed the geographic distribution of home improvement loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect loan purpose data for calendar year 1997.

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

Geographic Distribution: HOME MORTGAGE REFINANCE State: NEBRASKA Evaluation Period: January 1, 1997 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	% Occ Units	% Owner Occ Units	% BANK Loans	% Occ Units	% Owner Occ Units	% BANK Loans	% Occ Units	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Upper	#	% of Total	
<b>Full-Scope:</b>																			
Columbus	0%	0%	NA	75%	49%	25%	51%	MARKET SHARE INFORMATION IS NOT AVAILABLE										174	82%
<b>Limited-Scope:</b>																			
Norfolk	NA	NA	NA	72%	50%	28%	50%	MARKET SHARE INFORMATION IS NOT AVAILABLE										38	18%

(\*) Examiners analyzed the geographic distribution of home mortgage refinance loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect loan purpose data for calendar year 1997.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES State: NEBRASKA Evaluation Period: January 1, 1997 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 Loans to Businesses		
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total
Full-Scope:																
Columbus	0%	0%	NA	NA	73%	62%	27%	38%	1	30%	NA	NA	25%	51%	998	70%
Limited-Scope:																
Norfolk	NA	NA	NA	NA	89%	75%	11%	25%	1	27%	NA	NA	26%	43%	436	30%

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

**Table 6. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS State: NEBRASKA Evaluation Period: January 1, 1997 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 Loans to Farms		
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total
Full-Scope:																
Columbus	0%	0%	NA	NA	88%	68%	12%	32%	1	43%	NA	NA	37%	89%	2,267	95%
Limited-Scope:																
Norfolk	NA	NA	NA	NA	70%	51%	30%	49%	2	31%	NA	NA	29%	65%	109	5%

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

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE State: NEBRASKA Evaluation Period: January 1, 1997 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	% of BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**		Overall	Low	Mod	Mid	Upper
Full-Scope:													MARKET SHARE INFORMATION IS NOT AVAILABLE	
Columbus	12%	5%	18%	29%	26%	31%	44%	35%		MARKET SHARE INFORMATION IS NOT AVAILABLE			237	91%
Limited-Scope:													MARKET SHARE INFORMATION IS NOT AVAILABLE	
Norfolk	12%	4%	16%	26%	25%	22%	47%	48%		MARKET SHARE INFORMATION IS NOT AVAILABLE			24	9%

(\*) Examiners analyzed the borrower distribution of home purchase loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect income or loan purpose data for calendar year 1997.

(\*\*) As a percentage of loans with borrower income information available. No income information was available for five or 2% of home purchase loans analyzed from the Columbus AA and one or 4% of home purchase loans analyzed from the Norfolk AA.

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

Borrower Distribution: HOME IMPROVEMENT State: NEBRASKA Evaluation Period: January 1, 1997 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	% of BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**		Overall	Low	Mod	Mid	Upper
Full-Scope:													MARKET SHARE INFORMATION IS NOT AVAILABLE	
Columbus	12%	33%	18%	0%	26%	33%	44%	34%		MARKET SHARE INFORMATION IS NOT AVAILABLE			8	62%
Limited-Scope:													MARKET SHARE INFORMATION IS NOT AVAILABLE	
Norfolk	12%	0%	16%	20%	25%	40%	47%	40%		MARKET SHARE INFORMATION IS NOT AVAILABLE			5	38%

(\*) Examiners analyzed the borrower distribution of home improvement loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect income or loan purpose data for calendar year 1997.

(\*\*) As a percentage of loans with borrower income information available. No income information was available for 5 or 63% of home improvement loans analyzed from the Columbus AA. Income information was available for all home improvement loans analyzed from the Norfolk AA.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE State: NEBRASKA Evaluation Period: January 1, 1997 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 BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**	% of Families	% of BANK Loans**		Overall	Low	Mod	Upper	#
<b>Full-Scope:</b>														
Columbus	12%	3%	18%	12%	26%	23%	44%	62%	MARKET SHARE INFORMATION IS NOT AVAILABLE			174	82%	
<b>Limited-Scope:</b>														
Norfolk	12%	3%	16%	8%	25%	24%	47%	65%	MARKET SHARE INFORMATION IS NOT AVAILABLE			38	18%	

(\*) Examiners analyzed the borrower distribution of home mortgage refinance loans originated and purchased from January 1, 1998 - December 31, 1999 only since FNB&T did not collect income or loan purpose data for calendar year 1997.

(\*\*) As a percentage of loans with borrower income information available. No income information was available for 6 or 3% of home mortgage refinance loans analyzed from the Columbus AA and 1 or 3% of home mortgage refinance loans analyzed from the Norfolk AA.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES State: NEBRASKA Evaluation Period: January 1, 1997 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***	
	% of Businesses*	% BANK Loans**	\$100,000 or Less	>\$100,000 to \$250,000	Rev \$1 Million or Less	#
<b>Full-Scope:</b>						
Columbus	75%	83%	88%	6%	30%	998
<b>Limited-Scope:</b>						
Norfolk	70%	63%	86%	8%	27%	436

(\*) Businesses with revenues of \$1 million or less as a percentage of all businesses in the assessment area. No revenue information was reported by 17% of businesses in the Columbus AA and 22% of businesses in the Norfolk AA.

(\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 3% of small loans to businesses reported by FNB&T in the Columbus AA and for 4% of small loans to businesses reported by FNB&T in the Norfolk AA.

(\*\*\*) Based on 1998 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS State: NEBRASKA Evaluation Period: January 1, 1997 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	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	#	% of Total
<b>Full-Scope:</b>									
Columbus	96%	91%	85%	10%	5%	43%	44%	2,267	95%
<b>Limited-Scope:</b>									
Norfolk	96%	85%	92%	5%	3%	31%	32%	109	5%

(\*) Farms with revenues of \$1 million or less as a percentage of all farms in the assessment area. No revenue information was reported by 2% of farms in the Columbus AA and 2% of farms in the Norfolk AA.

(\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No revenue information was available for 4% of small loans to farms reported by FNB&T in the Columbus AA and for 6% of small loans to farms reported by FNB&T in the Norfolk AA.

(\*\*\*) Based on 1998 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: NEBRASKA Evaluation Period: March 21, 1997 to May 15, 2000								
MSA /Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<b>Full-Scope:</b>								
Columbus	0	\$0	5	\$185	5	\$185	0	\$0
<b>Limited-Scope:</b>								
Norfolk	0	\$0	5	\$41	5	\$41	0	\$0

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

(\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the 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: NEBRASKA Evaluation Period: March 21, 1997 to May 15, 2000																	
MSA /Assessment Area	Deposits		Branches				Branch Openings/Closings				Population						
	% of Rated Area Deposits in MSA/AA *	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by 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:																	
Columbus	80%	2	50%	0%	NA	50%	0	0	0	NA	0	0	0	0%	NA	74%	26%
Limited Scope:																	
Norfolk	20%	2	50%	NA	NA	100%	0	0	0	NA	0	0	0	NA	NA	73%	27%

(\*) Federal Deposit Insurance Corporation deposit data as of June 30, 1999.