



NEW YORK STATE BANKING DEPARTMENT
CONSUMER SERVICES DIVISION
One State Street
New York, NY 10004

PUBLIC SUMMARY

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Date of Evaluation: January 1, 2005

Institution: The Bank of New York
One Wall Street
New York, NY 10286

Note: This evaluation is not an assessment of the financial condition of this institution. The rating assigned does not represent an analysis, conclusion or opinion of the New York State Banking Department concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (“CRA”) performance of The Bank of New York (“BNY”) prepared by the New York State Banking Department. The evaluation represents the Banking Department’s current assessment and rating of the institution’s CRA performance based on an evaluation conducted as of January 1, 2005.

Section 28-b of the New York State Banking Law, as amended, requires that when evaluating certain applications, the Superintendent of Banks shall assess a banking institution’s record of helping to meet the credit needs of its entire community, including low and moderate income areas, consistent with safe and sound operations.

Part 76 of the General Regulations of the Banking Board implements Section 28-b and further requires that the Banking Department assess the CRA performance records of regulated financial institutions. Part 76 establishes the framework and criteria by which the Department will evaluate the performance. Section 76.5 further provides that the Banking Department will prepare a written report summarizing the results of such assessment and will assign to each institution a numerical CRA rating based on a 1 to 4 scoring system. The numerical scores represent an assessment of CRA performance as follows:

- (1) outstanding record of meeting community credit needs;
- (2) satisfactory record of meeting community credit needs;
- (3) needs to improve record of meeting community credit needs; and
- (4) substantial noncompliance in meeting community credit needs.

Section 76.5 further requires that the CRA rating and the written summary (“Evaluation”) be made available to the public. Evaluations are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Sections 76.8 through 76.13 of the regulation. These tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York State Banking Law.

For explanation of technical terms used in this report, please consult the **GLOSSARY** at the back of this document.

OVERVIEW OF INSTITUTION'S PERFORMANCE

Overall Rating

BNY is rated "2," indicating a satisfactory record of helping to meet community credit needs.

Lending Test - "Low Satisfactory"

- Lending levels reflect adequate responsiveness to assessment area credit needs. For the period under evaluation, the bank originated 25,586 HMDA-reportable and small business loans totaling over \$4 billion.
- A substantial majority of BNY's loans were made in the bank's assessment area. The assessment area percentages for 2003 and 2004 were 99.7% and 99.4%, respectively.
- The geographic distribution of loans reflects adequate dispersion throughout the assessment area.
- The distribution by borrower characteristics reflects good penetration among customers of different income levels and businesses of different revenue sizes.
- BNY makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment area.
- The bank had an excellent level of community development lending. For the period under evaluation, BNY's community development lending activity totaled \$824.6 million, including \$711.3 million (86.3%) in new money.

Investment Test - "Outstanding"

- BNY has an excellent level of qualified community development investments. During the evaluation period, investments totaled \$370.7 million, with \$195.6 million (52.8%) categorized as new money.

Service Test - "Low Satisfactory"

- Delivery systems are reasonably accessible to essentially all portions of the bank's assessment area. Banking offices within and adjacent to LMI census tracts account for 34% of BNY's branch network.
- BNY offers an alternative low-cost banking account that is more advantageous to the consumer than the Basic Banking Account mandated by NYS regulation.

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- Services do not vary in a way that inconveniences any particular portion of the assessment area, including LMI geographies and/or LMI individuals.
 - The bank provides a relatively high level of community development services.

This evaluation was conducted based on a review of the 12 assessment factors set forth in Section 28-b of the New York State Banking Law and Part 76 of the General Regulations of the Banking Board.

PERFORMANCE CONTEXT

Institution's Profile:

BNY was established in 1784 in lower Manhattan and chartered by the State of New York. BNY has the distinction of being the oldest bank in the United States. Still headquartered in lower Manhattan, BNY is a multi-state commercial bank with domestic branches in New York, New Jersey and Connecticut. The bank is the principal subsidiary of the Bank of New York Company, Inc. ("BNYCO"), a New York State-based bank holding company that is a global leader in securities servicing for investors, financial intermediaries and issuers. The bank also plays an integral role in the infrastructure of the world's capital markets, servicing securities in more than 100 markets around the globe.

BNY provides financial services to corporations and individuals through four primary businesses: (1) securities servicing, (2) treasury management, (3) investment management, and (4) individual and regional banking.

According to the Federal Deposit Insurance Corporation ("FDIC"), BNY's network of 251 branches in New York State held \$32.7 billion in deposits as of June 30, 2004. The bank was the fourth largest deposit-taking institution in the state, with 5.13% of total deposits. Within its assessment area, BNY ranked fourth in deposits out of 150 institutions.

The following chart shows BNY's deposit market share in each county within the bank's assessment area.

BNY's Deposit Market Share Based on Deposits as of 6/30/2004						
County	Number of BNY Branches	Deposits \$ (000's)	BNY Pct. Deposits per County	County Market Share	County Ranking	Competing FDIC Insured Institutions
Kings	1	11,757	0.04	0.04%	38	39
Bronx	0	0	N/A	N/A	N/A	23
New York	20	22,995,062	70.36	6.68%	3	92
Queens	17	599,104	1.83	1.71%	15	46
Westchester	62	3,547,370	10.85	13.59%	3	37
Rockland	22	1,003,413	3.07	15.54%	2	17
Putnam	1	47,204	0.14	1.32%	10	13
Nassau	45	1,833,024	5.61	3.97%	10	31
Suffolk	45	1,568,667	4.80	5.39%	7	25
Dutchess	14	381,964	1.17	11.09%	2	18
Orange	18	586,984	1.80	11.69%	2	24
Ulster *	4	52,649	0.16	2.36%	12	15
Sullivan *	2	53,201	0.16	5.45%	8	11
Assessment Area	251	32,680,399	100.0	6.03%	4	150

Ulster and Sullivan counties are partial counties in the bank's assessment area; however, the market share, ranking and number of competing institutions presented are for the *entire* counties.

The bank, through its affiliate BNY Mortgage Company (“BNYMC”), originates residential mortgages for one- to four-family homes, condominiums, and cooperative apartments. BNYMC was formed to increase the bank’s mortgage origination business by broadening available mortgage products and services. BNY owns 47% of BNYMC, which is a joint venture with EverBank. EverBank is a federally-chartered institution based in Jacksonville, Florida that operates four branches in the Jacksonville area (as of June 2005).

BNY Aurora Holding Corporation (“BNYAH”) is a non-bank subsidiary of BNY that invests in low-income rental housing development and rehabilitation projects through low-income housing tax credits. BNYAH is the subsidiary responsible for BNY’s CRA-qualified investments.

The combined activities of BNY, BNYMC and BNYAH are included in this review and are referred to hereafter as simply “BNY”.

For the fiscal year ending December 31, 2004, BNY’s Consolidated Reports of Condition and Income showed total assets of \$92.1 billion. Included in this total are \$35.6 billion in net loans and lease finance receivables and \$22.7 billion in securities. As of the same date, deposits totaled \$65.5 billion, including \$41.5 billion in domestic offices and \$24 billion in foreign offices, Edge Act Agreement subsidiaries and International Banking Facilities. As of year-end 2004, domestic core deposits totaled \$33.2 billion, equity capital totaled \$8.1 billion, and net income for the calendar year was reported as \$1.2 billion.

BNY offers a wide variety of retail and commercial lending products including, but not limited to, the following:

Residential Home Mortgages	Home Equity Loans
Personal Loans	Auto Loans
Student Loans	Overdraft Protection
Lines of Credit	Trade Financing
Revolving Credits	Commercial Mortgages
Installment or Term Loans	SBA Loans
Lease Financing	Debit Business Cards
Letters of Credit	

The table below shows the composition of BNY’s loan portfolio as of December 31 for calendar years 2002 through 2004:

BNY: Gross Loans Outstanding						
LOAN TYPE	12/31/2004		12/31/2003		12/31/2002	
	\$000	%	\$000	%	\$000	%
Foreign Branch Loans	10,160,488	28.0	10,364,561	28.1	13,749,000	42.1
Purchase/Carry Securities Loans	8,655,115	23.9	9,543,339	25.9	1,520,525	4.7
Lease Financing Loans	5,662,752	15.6	5,717,765	15.5	5,499,952	16.8
1-4 Family Mortgage Loans	4,237,728	11.7	3,272,317	8.9	2,966,405	9.1
Commercial and Industrial Loans	2,645,486	7.3	2,575,990	7.0	3,192,947	9.8
Other Loans	1,923,621	5.3	1,968,068	5.3	2,070,350	6.3
Commercial Real Estate Loans	1,581,146	4.4	1,884,726	5.1	2,036,990	6.2
Consumer Loans	757,935	2.1	941,250	2.6	1,169,650	3.6
Multifamily Mortgage Loans	414,454	1.1	416,150	1.1	331,508	1.0
Construction & Land Development Loans	120,007	0.3	125,289	0.3	136,798	0.4
U.S. Commercial Bank Loans	66,098	0.2	37,028	0.1	6,283	0.0
Agricultural & Farm Loans	1,435	0.0	7,336	0.0	9,941	0.0
Total Gross Loans	36,226,265	100.0	36,853,819	100.0	32,690,349	100.0

The Banking Department's previous CRA evaluation of BNY was conducted as of January 1, 2003, and resulted in a rating of "2." This rating reflected the bank's satisfactory record of helping to meet community credit needs.

During the current evaluation, there were no legal or financial impediments affecting the bank's ability to meet the credit needs of its community.

Assessment Area:

BNY's New York State assessment area is unchanged from the prior review and includes 11 full counties and two partial counties.

The assessment area includes seven of the eight counties in MSA 5600¹: Kings, Queens, New York, Bronx, Westchester, Rockland, and Putnam. The area also includes the counties of Nassau and Suffolk, which comprise MSA 5380; Dutchess County, which is MSA 2281 in its entirety; and the New York portion of MSA 5660 (Newburgh, NY-PA), which is Orange County. In addition, the bank has included major portions of Sullivan and Ulster Counties. These two counties are not within an MSA.

As of 2004, the Office of Management and Budget ("OMB") re-defined MSAs and other statistical areas such as census tracts. These changes had a negligible impact on the geographic limits of BNY's assessment area.

MSA 5600 and MSA 5380 are now contained in an expanded MSA 35620 entitled "New York-Northern-New Jersey-Long Island, NY-NJ-PA". This new MSA 35620 incorporates four metropolitan divisions ("MD") of which one is MD 35004 (Nassau and Suffolk counties) and another is MD 35644. MD 35644 contains the eight counties from "old" MSA 5600 plus three New Jersey counties: Bergen, Hudson and Passaic. Dutchess and Orange

¹ Richmond County (Staten Island) is not included in the assessment area.

counties are in a new MSA numbered 39100. Ulster County which had been considered non-MSA in 2003 is now part of MSA 28740 with Kingston identified as the principal city. Sullivan County remains a non-MSA area.

The following chart shows the distribution of census tracts within BNY's assessment area based on updated information from the OMB and the 2000 United States Census. Using definitions and data from 2004, BNY's assessment area contains a total of 3,198 census tracts, of which 2.4% are zero-income, 10.7% are low-income, 23.1% are moderate-income, 36.9% middle-income, and 26.9% are upper-income tracts.

BNY Assessment Area Geo-coded Census Tracts Based on 2004 OMB Revisions (Numbers Shown in Bold Are Based on 1990 Census Data)														
County	Zero		Low		Moderate		Middle		Upper		2004		2003	
											Total	LMI %	Total	LMI %
Kings	15	15	119	100	297	271	235	250	117	147	783	53.1	783	47.4
Bronx	14	14	132	117	98	99	65	72	46	53	355	64.8	355	60.8
New York	9	9	60	47	59	68	24	26	144	146	296	40.2	296	38.9
Queens	18	18	12	12	148	107	310	298	185	238	673	23.8	673	17.7
Westchester	4	4	4	2	21	17	39	37	153	161	221	11.3	221	8.6
Rockland	0	0	2	2	2	1	9	9	45	46	58	6.9	58	5.2
Putnam	0	0	0	0	0	0	0	0	19	19	19	0.0	19	0.0
MD 35644 / MSA 5600 total	60	60	329	280	625	563	682	692	709	810	2,405	39.7	2,405	35.1
Nassau	8	8	2	2	20	20	178	179	69	68	277	7.9	277	7.9
Suffolk	8	8	2	2	64	65	197	196	49	49	320	20.6	320	20.9
MD 35004 / MSA 5380 total	16	16	4	4	84	85	375	375	118	117	597	14.7	597	14.9
Dutchess (MSA 2281)	2	2	5	5	7	9	43	41	9	9	66	18.2	66	21.2
Orange (MSA 5660)	0	0	5	5	14	11	35	33	13	18	67	28.4	67	23.9
MSA 39100 total	2		10		21		78		22		133	23.3		
Ulster MSA 28740 (Non MSA)	0	0	0	0	6	2	33	22	7	22	46	13.0	46	4.3
Sullivan (Non MSA)	0	0	0	0	2	2	12	13	3	2	17	11.8	17	11.8
AA TOTAL	78	78	343	294	738	672	1,180	1,176	859	978	3,198	33.8	3,198	30.2
	2.4	2.4	10.7	9.2	23.1	21.0	36.9	36.8	26.9	30.6	100		100	

As the preceding chart indicates, LMI census tracts increased as a percentage of total tracts by 11.9% in 2004, with the largest increase (13.2%) occurring in MD 35644.

In the interest of clarity, the revised MSA and MD categories adopted by the OMB in 2004 will be used uniformly throughout this evaluation.

The following table summarizes the 2003 and 2004 unemployment rates for New York State as well as for particular Metropolitan Divisions, regions and whole counties.

Unemployment Percentages by Geographic Area							
YEAR	Bronx	Kings	New York	Queens	Westchester	Rockland	Putnam
2004	9.1	7.7	6.2	6.4	4.5	4.4	3.9
2003	10.4	9.0	7.5	7.4	4.6	4.7	4.0
	New York City & NYC Region				Putnam-Rockland-Westchester		
2004	7.1				4.4		
2003	8.3				4.6		
	New York State						
2004	5.8						
2003	6.4						
	Hudson Valley Region				Nassau-Suffolk MD		
2004	4.5				4.6		
2003	4.5				4.8		
	Dutchess	Orange	Ulster	Sullivan	Nassau	Suffolk	
2004	4.2	4.6	4.8	5.3	4.5	4.7	
2003	4.1	4.7	4.6	5.3	4.7	4.8	

The bank's assessment area appears reasonable based upon BNY's lending patterns and the location of its branches. There is no evidence that LMI areas have been arbitrarily excluded.

Please refer to the charts on pages 3-6 through 3-9 for demographic, housing and small business data for the 11 full counties and two partial counties in BNY's assessment area.

- Chart 1 – Population and Income
- Chart 2 – Housing
- Chart 3 – Business Demographics
- Chart 4 – Summary of Businesses by Standard Industrial Classification

Note that Chart 3 details the number and percentages of *total* businesses within the assessment area and includes small businesses, businesses with annual revenues greater than \$1 million and businesses that did not report their revenue size.

CHART # 2

BANK OF NEW YORK ASSESSMENT AREA HOUSING CHARACTERISTICS BY COUNTY, MD & MSA																					
COUNTY	Total Housing Units	1-4 family Units		Multifamily Units		Owner-Occupied Units (O-O)		O-O Units in Low-income Tracts		O-O Units in Mod-income Tracts		O-O Units in Mid-income Tracts		O-O Units in Upp-income Tracts		Rental Units		Vacant/ Boarded-up Units		Medium House Value	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	\$	
MD 35644 NEW YORK-WAYNE-WHITE PLAINS, NY-NJ																					
BRONX	490,659	132,650	27.0	357,495	72.9	90,522	18.4	11,370	12.6	20,802	23.0	33,285	36.8	25,066	27.7	391,918	79.9	27,447	5.6	159,625	
KINGS	930,866	455,859	49.0	474,122	50.9	238,290	25.6	13,368	5.6	77,659	32.6	92,885	39.0	54,378	22.8	670,996	72.1	50,139	5.4	235,737	
NEW YORK	798,144	28,178	3.5	769,392	96.4	148,695	18.6	3,881	2.6	12,773	8.6	7,108	4.8	124,934	84.0	616,053	77.2	59,500	7.5	345,099	
QUEENS	817,250	494,122	60.5	322,175	39.4	334,894	41.0	1,013	0.3	43,109	12.9	162,131	48.4	128,641	38.4	462,179	56.6	34,586	4.2	199,093	
PUTNAM	35,030	32,897	93.9	1,784	5.1	26,884	76.7	-	0.0	-	0.0	-	0.0	26,884	100.0	6,197	17.7	2,327	6.6	208,423	
ROCKLAND	94,973	77,801	81.9	15,958	16.8	66,461	70.0	598	0.9	479	0.7	5,569	8.4	59,815	90.0	27,349	28.8	2,298	2.4	228,035	
WESTCHESTER	349,445	237,122	67.9	112,117	32.1	202,765	58.0	507	0.3	4,887	2.4	20,824	10.3	176,547	87.1	140,169	40.1	12,303	3.5	285,775	
MD 35644	3,516,367	1,458,629	41.5	2,053,043	58.4	1,108,511	31.5	30,737	2.8	159,708	14.4	321,802	29.0	596,264	53.8	2,314,861	65.8	188,600	5.4	245,916	
MD 35004 NASSAU-SUFFOLK, NY																					
NASSAU	458,151	408,695	89.2	48,950	10.7	359,257	78.4	647	0.2	16,993	4.7	247,420	68.9	94,197	26.2	91,345	19.9	10,764	2.3	278,789	
SUFFOLK	522,323	478,870	91.7	37,980	7.3	374,371	71.7	945	0.3	72,600	19.4	237,997	63.6	62,829	16.8	101,107	19.4	53,024	10.2	207,175	
MD 35004	980,474	887,565	90.5	86,930	8.9	733,628	74.8	1,592	0.2	89,593	12.2	485,417	66.17	157,026	21.4	192,452	19.6	63,788	6.5	240,638	
MSA 39100 POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY																					
DUTCHESS	106,103	87,590	82.6	14,100	13.3	68,628	64.7	1,091	1.6	4,118	6.0	48,184	70.2	15,235	22.2	32,925	31.0	6,567	6.2	147,659	
ORANGE	122,754	104,229	84.9	14,868	12.1	76,948	62.7	1,916	2.5	8,087	10.5	48,754	63.4	18,191	23.6	40,353	32.9	7,966	6.5	146,546	
MSA 39100	228,857	191,819	83.8	28,968	12.7	145,576	63.6	3,007	2.1	12,205	8.4	96,938	66.59	33,426	23.0	73,278	32.0	14,533	6.4	147,062	
MSA 28740 KINGSTON, NY																					
**ULSTER	74,162	62,208	83.9	6,226	8.4	44,618	60.2	-	0.0	3,208	7.2	34,632	77.6	6,777	15.2	22,824	30.8	8,436	11.4	112,446	
MSA 28740	74,162	62,208	83.9	6,226	8.4	44,618	60.2	-	0.0	3,208	7.2	34,632	77.6	6,777	15.2	22,824	30.8	8,436	11.4	112,446	
NON-MSA																					
**SULLIVAN	34,018	27,157	79.8	3,270	9.6	13,624	40.0	-	0.0	911	6.7	8,778	64.4	3,935	28.9	8,769	25.8	13,141	38.6	90,065	
NON-MSA	34,018	27,157	79.8	3,270	9.6	13,624	40.0	-	0.0	911	6.7	8,778	64.4	3,935	28.9	8,769	25.8	13,141	38.6	90,065	
TOTAL A/A*	4,833,878	2,627,378	54.4	2,178,437	45.1	2,045,957	42.3	35,336	1.7	265,625	13.0	947,568	46.3	797,428	39.0	2,612,184	54.0	288,498	6.0	237,021	

* Assessment Area; ** Partial Counties

CHART # 3

BANK OF NEW YORK BUSINESS DEMOGRAPHICS BY COUNTY, MD & MSA													
COUNTY	Number of Businesses	Businesses with Rev. of \$1 million or less		Businesses with Rev. of more than \$1 million		Businesses with no revenues reported		Businesses with less than 50 employees		Operating from a single location		Businesses Located in LMI Areas	
		#	%	#	%	#	%	#	%	#	%	#	%
MD 35644 NEW YORK-WAYNE-WHITE PLAINS, NY-NJ													
BRONX	38,647	25,300	65.5	1,861	4.8	11,486	29.7	28,775	74.5	35,601	92.1	25,207	65.2
KINGS	108,481	71,831	66.2	5,359	4.9	31,291	28.8	80,804	74.5	101,940	94.0	58,013	53.5
NEW YORK	219,934	131,891	60.0	23,025	10.5	65,018	29.6	164,325	74.7	190,968	86.8	28,299	12.9
QUEENS	102,659	66,902	65.2	5,442	5.3	30,315	29.5	75,894	73.9	95,959	93.5	29,282	28.5
PUTNAM	6,173	4,395	71.2	311	1,467.0	1,467	23.8	5,184	84.0	5,918	95.9	-	-
ROCKLAND	23,878	15,773	66.1	1,177	4.9	6,928	29.0	18,390	77.0	22,389	93.8	1,122	4.7
WESTCHESTER	76,247	51,018	66.9	4,683	6.1	20,546	26.9	60,079	78.8	70,460	92.4	8,199	10.8
MD 35644	576,019	367,110	63.7	41,858	7.3	167,051	29.0	433,451	75.2	523,235	90.8	150,122	26.1
MD 35004 NASSAU-SUFFOLK, NY													
NASSAU	126,042	82,492	65.4	7,203	5.7	36,347	28.8	95,607	75.9	118,453	94.0	8,298	6.6
SUFFOLK	121,633	80,707	66.4	7,389	6.1	33,537	27.6	96,025	78.9	114,803	94.4	23,894	19.6
MD 35004	247,675	163,199	65.9	14,592	5.9	69,884	28.2	191,632	77.4	233,256	94.2	32,192	13.0
MSA 39100 POUGHKEEPSIE-NEWBURGH-MIDDLETOWN, NY													
DUTCHESS	16,904	11,480	67.9	808	4.8	4,616	27.3	14,182	83.9	15,457	91.4	2,878	17.0
ORANGE	22,712	15,144	66.7	1,123	4.9	6,445	28.4	18,655	82.1	20,766	91.4	5,431	23.9
MSA 39100	39,616	26,624	67.2	1,931	4.9	11,061	27.9	32,837	82.9	36,223	91.4	8,309	21.0
MSA 28740 KINGSTON, NY													
ULSTER	11,924	8,213	68.9	527	4.4	3,184	26.7	9,948	83.4	11,103	93.1	1,344	11.3
MSA 28740	11,924	8,213	68.9	527	4.4	3,184	26.7	9,948	83.4	11,103	93.1	1,344	11.3
NON-MSA													
SULLIVAN	3,784	2,477	65.5	157	4.1	1,150	30.4	2,952	78.0	3,512	92.8	349	9.2
NON-MSA	3,784	2,477	65.5	157	4.1	1,150	30.4	2,952	78.0	3,512	92.8	349	9.2
Total A/A	879,018	567,623	64.6	59,065	6.7	252,330	28.7	670,820	76.3	807,329	91.8	192,316	21.9

* Data is from New York State Labor Department

** AA Partial Counties

CHART # 4

BANK OF NEW YORK ASSESSMENT AREA STANDARD INDUSTRIAL CLASSIFICATION* BY COUNTY <i>(based on OMB 2004 revisions)</i>																				
COUNTY	Establishment Total		Service Providers		Retail Trade		Finance, Insurance and Real Estate		Wholesale Trade		Construction		Manufacturing		Transportation and Communication		Non-Classifiable Establishments		Other Establishments	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
MD 35644	579,353		230,081	39.7	101,634	17.5	55,642	9.6	34,512	6.0	29,373	5.1	23,724	4.1	23,395	4.0	73,855	12.7	7,137	1.2
KINGS	108,807		40,264	37.0	22,688	20.9	8,727	8.0	6,510	6.0	6,101	5.6	4,173	3.8	4,647	4.3	14,834	13.6	863	0.8
BRONX	38,751		14,613	37.7	9,376	24.2	3,553	9.2	1,690	4.4	2,317	6.0	989	2.6	1,671	4.3	4,144	10.7	398	1.0
NEW YORK	220,439		94,320	42.8	33,571	15.2	25,030	11.4	15,852	7.2	4,096	1.9	11,698	5.3	7,175	3.3	26,539	12.0	2,158	1.0
QUEENS	103,066		35,978	34.9	20,315	19.7	8,328	8.1	5,882	5.7	7,745	7.5	3,372	3.3	6,096	5.9	14,488	14.1	862	0.8
WESTCHESTER	77,584		32,562	42.0	11,266	14.5	7,560	9.7	3,166	4.1	6,214	8.0	2,465	3.2	2,770	3.6	9,653	12.4	1,928	2.5
ROCKLAND	24,317		9,920	40.8	3,491	14.4	1,992	8.2	1,179	4.8	1,929	7.9	794	3.3	811	3.3	3,568	14.7	633	2.6
PUTNAM	6,389		2,424	37.9	927	14.5	452	7.1	233	3.6	971	15.2	233	3.6	225	3.5	629	9.8	295	4.6
MD 35004	252,779		95,915	37.9	38,349	15.2	21,687	8.6	12,644	5.0	22,636	9.0	9,699	3.8	9,321	3.7	36,005	14.2	6,523	2.6
NASSAU	127,869		50,136	39.2	19,173	15.0	12,309	9.6	6,299	4.9	8,868	6.9	4,066	3.2	4,640	3.6	19,921	15.6	2,457	1.9
SUFFOLK	124,910		45,779	36.6	19,176	15.4	9,378	7.5	6,345	5.1	13,768	11.0	5,633	4.5	4,681	3.7	16,084	12.9	4,066	3.3
MSA 39100	41,010		16,093	39.2	7,211	17.6	3,163	7.7	1,533	3.7	4,212	10.3	1,343	3.3	1,496	3.6	3,903	9.5	2,056	5.0
DUTCHESS	17,532		7,071	40.3	3,045	17.4	1,332	7.6	548	3.1	1,856	10.6	583	3.3	570	3.3	1,604	9.1	923	5.3
ORANGE	23,478		9,022	38.4	4,166	17.7	1,831	7.8	985	4.2	2,356	10.0	760	3.2	926	3.9	2,299	9.8	1,133	4.8
ULSTER	12,343		4,923	39.9	2,209	17.9	807	6.5	439	3.6	1,104	8.9	540	4.4	457	3.7	1,256	10.2	608	4.9
SULLIVAN	3,891		1,413	36.3	664	17.1	336	8.6	134	3.4	346	8.9	109	2.8	187	4.8	520	13.4	182	4.7
TOTAL A/A**	889,376		348,425	39.2	150,067	16.9	81,635	9.2	49,262	5.5	57,671	6.5	35,415	4.0	34,856	3.9	115,539	13.0	16,506	1.9

*The Standard Industrial Classification codes are set by the Occupational Safety & Health Administration of the U.S. Department of Labor

**Assessment Area

PERFORMANCE TESTS AND ASSESSMENT FACTORS

The Banking Department assesses a large bank's CRA performance by evaluating its lending, investment and service activities using the Lending, Investment and Service Tests provided for in Parts 76.8, 76.9 and 76.10 of the General Regulations of the Banking Board.

This performance evaluation is based on a review of the bank's lending, investment, and service activities in its New York State assessment area, for the calendar years 2003 and 2004. Products considered for this evaluation include HMDA-reportable 1-4 family originations, home improvement, refinancing, multifamily loans and small business loans.

Statistics utilized in this evaluation were derived from various sources. In addition to loan information submitted by the bank, aggregate data for HMDA-reportable and small business loans were obtained from the Federal Financial Institutions Examination Council ("FFIEC") and PCI Services, Inc. CRA Wiz[®], an external vendor. Demographic data, along with the 2004 HUD-estimated median family income, are from the 2000 U.S. Census. The bank's HMDA-reportable and small business lending performance was compared to that of the corresponding aggregate, which includes all lenders reporting such loans within the bank's assessment area.

OMB revisions were the basis for geography income levels in 2004. The U.S. Department of Housing and Urban Development's ("HUD") estimates of 2003 and 2004 median family incomes were utilized for borrower income levels.

I. Lending Test: - "Low Satisfactory"

The bank's lending performance is evaluated pursuant to the following criteria: (1) Lending Activity, (2) Assessment Area Lending, (3) Geographic Distribution, (4) Borrower Characteristics, (5) Community Development Lending, and (6) Flexible Lending Practices.

Lending Activity: "Low Satisfactory"

The bank's lending levels reflect adequate responsiveness to assessment area credit needs.

BNY's combined lending volume for HMDA-reportable and small business lending reflects increases of 9% and 42% by number and dollar volume, respectively, compared with the percentages reported at the prior evaluation. The improvement was due to increased residential mortgage originations (35.3%) and tempered by a decline in small business lending (20.4%).

HMDA-reportable Loans

BNY's residential mortgage lending level reflects good responsiveness to assessment area credit needs.

In 2003, BNY ranked 12th out of 694 lenders in its assessment area based on number and dollar volume of HMDA-reportable loans originated. During that year, BNY achieved market share percentages of 1.9% by number of loans and 1.6% by dollar volume. As of June 30, 2003, the bank had the third-largest deposit market share in its assessment area.

In 2001, BNY had the same market share as in 2003 and ranked 13th (1.9%) and 17th (1.6%), respectively. In 2002, the bank ranked 12th by number of loans (2%) and 13th in dollar volume (1.6%).

The following table details the bank's HMDA-reportable lending volume categorized by loan purpose:

BNY HMDA-Reportable Loan Distribution Sorted by Purpose												
Loan Purpose	2004				2003				Total			
	#	% by #	\$000	% by \$	#	% by #	\$000	% by \$	#	% by #	\$000	% by \$
Home Purchase	4,530	62.2	1,116,648	68.4	4,245	44.7	948,929	48.9	8,775	52.3	2,065,577	57.8
Refinance	1,925	26.4	447,230	27.4	5,017	52.8	940,451	48.5	6,942	41.3	1,387,681	38.8
Home Improvement	833	11.4	67,690	4.1	219	2.3	2,418	0.1	1,052	6.3	70,108	2.0
Multifamily	0	0.0	0	0.0	20	0.2	48,851	2.5	20	0.1	48,851	1.4
Total	7,288	100.0	1,631,568	100.0	9,501	100.0	1,940,649	100.0	16,789	100.0	3,572,217	100.0

As detailed in the table above, BNY originated 9,501 HMDA-reportable loans during 2003, representing 56.6% of total originations for the evaluation period. In 2003, the bank improved on its 2002 lending volume by approximately 33% as borrowers took advantage of continued low interest rates. The bank's substantial percentage increase was only slightly behind the aggregate's corresponding increase of approximately 35%.

In 2004, BNY's loan numbers decreased by 23.3% to 7,288 and the dollar volume decreased by 15.9% to \$1.6 billion. The decline appears to mirror a nationwide trend according to estimates from the Mortgage Bankers Association of America ("MBA"). In 2004, according to the MBA estimates, the dollar volume of mortgage originations declined over 30% from 2003. The estimates indicate that, in 2003, refinance loans accounted for 66.4% of the dollar volume, compared to 44.5% a year later. The Federal Reserve Board's Beige Book for October 27, 2004 cites a widespread decline in refinancing activity in the Second District, which includes New York State.

The bank's major lending market markets are MD 35644, MD 35004, and MSA 39100, which together account for more than 95% of BNY's HMDA-reportable lending. The chart

below details BNY's HMDA-reportable lending activity sorted by MD and MSA during the evaluation period and includes market-rank data for 2003. Market-rank data for 2004 was unavailable at the time this evaluation was written.

BNY HMDA-reportable Lending Sorted by MD and MSA (Revised OMB Designations)								
MD/MSA	MD/MSA Name	2003					2004	
		#	% by #	Market Share %	Market Rank	Number of Lenders	#	% by #
MD 35644	New York	6,767	71.2	2.8	7	590	5,070	69.6
MD 35004	Nassau-Suffolk	2,072	21.8	1.1	20	491	1,472	20.2
MSA 39100	Dutchess-Orange	566	6.0	1.4	18	396	582	8.0
Non-MSA	Sullivan (County)	54	0.6	2.6	10	190	109	1.5
MSA 28740	Ulster	42	0.4	0.6	34	247	55	0.8
Assessment Area		9,501	100.0	1.9	12	694	7,288	100.0

As the chart indicates, BNY's originations between years of the current evaluation period declined 25.1% and 29% in MDs 35644 and 35004, respectively. In 2003, BNY registered a slight increase (0.3%) in MSA 39100.

Small Business Loans

The small business lending level reflects adequate responsiveness to the assessment area's credit needs.

During the evaluation period, BNY originated 8,797 small business loans totaling \$457.8 million, reflecting declines of 20.4% and 25.8% by number and dollar volume, respectively, compared to the prior evaluation.

Included in BNY's small business lending are 4,050 automatic line-of-credit increases representing over 46% of the bank's volume. This small business program, called Business CreditLink, automatically increases the credit line of existing BNY customers. Each line increase constitutes a new small business loan provided that the individual line does not exceed \$1 million. These line increases averaged approximately \$5 thousand per loan. BNY's small business lending without the line-increase loans decreased almost 35% over the same period.

In 2003, the bank ranked 17th and 6th in number of originations and dollar volume, respectively, among 330 small business lenders in the assessment area. BNY's market share was 1.3% by loan number and 2.8% by dollar volume of loans, reflecting declines from the prior year. In 2002 the bank's market shares were 1.6% by number of loans and 4.1% by dollar volume.

BNY's small business loan totals for 2003 reflected an 8.5% decline compared with 2002. The aggregate increased by 8.9% over the same period. The bank's declining trend continued in 2004, falling 6.7% from 2003. Refer to the following chart for details of the bank's changes compared with the aggregate:

	BNY	Small Business Origination Chart	Aggregate	
Decrease	18.2	2001 to 2002 Percentage Change	14.7	Increase
Decrease	8.5	2002 to 2003 Percentage Change	8.9	Increase
Decrease	6.7	2003 to 2004 Percentage Change	N/A	N/A

BNY's small business lending has been declining from 2002 through 2004. In 2002, the bank originated 4,974 loans. In 2003, BNY originated 4,551 loans, representing an 8.5% decrease from the prior year. In 2004, BNY originated 4,246 loans, representing an additional decrease of 6.7% between 2003 and 2004. According to bank management, the declining trend and loss of market share are attributable to the unusually high level of competition in the tri-state New York marketplace, where competitors have expanded their branch networks significantly. Management further indicated that BNY has increased its own marketing budget by 20% during the evaluation period to target LMI communities.

The bank's major lending areas are MD 35644, MD 35004, and MSA 39100, which together constitute more than 98% of BNY's reportable lending activity. The following chart details lending data sorted by MD and MSA during the evaluation period and include market-rank data for 2003. Market-rank data for 2004 was unavailable.

BNY Small Business Lending sorted by MD and MSA (Revised OMB Designations)								
MD/MSA	MD/MSA Name	2003					2004	
		#	% by #	Market Share %	Market Rank	Number of Lenders	#	% by #
MD 35644	New York	2,644	58.1	1.2	17	290	2,463	58.0
MD 35004	Nassau-Suffolk	1,448	31.8	1.4	16	150	1,353	31.9
MSA 39100	Dutchess-Orange	396	8.7	2.4	10	83	366	8.6
Non-MSA	Sullivan (County)	26	0.6	1.4	15	38	17	0.4
MSA 28740	Ulster	37	0.8	0.6	17	55	47	1.1
Assessment Area		4,551	100.0	1.3	17	330	4,246	100.0

Lending Within the Assessment Area: "Outstanding"

BNY made a substantial majority of its loans within the assessment area.

The following chart details BNY's assessment area lending percentages in 2003 and 2004:

BNY Assessment Area Lending Comparison								
LOAN TYPE	2003				2004			
HMDA	#	% by #	\$000	% by \$	#	% by #	\$000	% by \$
In	163	98.8	142,271	99.8	678	96.9	157,357	99.0
Out	2	1.2	335	0.2	22	3.1	1,652	1.0
Subtotal	165	100.0	142,606	100.0	700	100.0	159,009	100.0
Small Business	#	% by #	\$000	% by \$	#	% by #	\$000	% by \$
In	4,551	99.8	273,153	99.7	4,246	99.8	183,939	99.9
Out	11	0.2	697	0.3	8	0.2	142	0.1
Subtotal	4,562	100.0	273,850	100.0	4,254	100.0	184,081	100.0
HMDA and Small Business	#	% by #	\$000	% by \$	#	% by #	\$000	% by \$
In	4,714	99.7	415,424	99.8	4,924	99.4	341,296	99.5
Out	13	0.3	1,032	0.2	30	0.6	1,794	0.5
TOTAL	4,727	100.0	416,456	100.0	4,954	100.0	343,090	100.0

During the evaluation period, BNY extended almost 99.6% of its combined HMDA-reportable and small business loans in number and dollar volume inside the assessment area. It should be noted that Section 76.8 (c) (3) of Part 76 of the General Regulations of the Banking Board states that affiliate lending is not to be considered when assessing a bank's record of lending in its assessment area. As a result, the above table only reflects those loans originated directly by The Bank of New York itself. The table will not reconcile to the HMDA tables found elsewhere in this report because those tables include the lending activity of BNY and its affiliate.

Geographic Distribution: "Low Satisfactory"

The geographic distribution of BNY's loans reflects adequate penetration throughout the assessment area.

HMDA-reportable Loans

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area.

Please refer to exhibits 5.1 to 5.4 "HMDA Loan Originations – Geography Income Level Distribution" for the loan data utilized to evaluate the geographic distribution of BNY's HMDA-reportable loan originations.

In 2003, BNY originated 9,501 HMDA-reportable loans totaling \$1.9 billion within its New York State assessment area, of which 1,948 loans (20.5%) totaling \$394.5 million (20.3%) were made in LMI tracts. The bank's LMI penetration rate outperformed the aggregate percentage by more than 42%, but underperformed the market aggregate in middle-income tracts by approximately 9%. In 2004, BNY originated 7,288 HMDA-reportable loans totaling \$1.6 billion, of which 1,948 (26.7%) loans totaling \$479.5 million (29.4%) were made in LMI

tracts. These figures represent relatively stable volume, but significantly increased LMI penetration rates between years. Due to the revisions adopted by the OMB in 2004, the number of LMI tracts increased by 115 (11.9%), which may account for the inter-year increase in moderate-income percentages.

Distribution of HMDA Reportable Loans by Census Tract Income Level							
Census Tract Income Level	BNY in 2003				AGGREGATE in 2003		2003 Owner Occupied Housing Unit %
	#	% by #	\$000	% by \$	% by #	% by \$	
Low	334	3.5	73,520	3.8	1.6	1.8	1.4
Moderate	1,614	17.0	320,987	16.5	12.8	11.7	11.5
<i>LMI Total</i>	1,948	20.5	394,507	20.3	14.4	13.5	12.9
Middle	3,831	40.3	751,411	38.7	44.2	37.9	44.5
Upper	3,706	39.0	789,793	40.7	41.3	48.3	42.7
N/A	16	0.2	4,938	0.3	0.2	0.4	
Total for 2003	9,501	100	1,940,649	100	100	100	
Census Tract Income Level	BNY in 2004				AGGREGATE in 2004		2004 Owner Occupied Housing Unit %
	#	% by #	\$000	% by \$	<i>Unavailable</i>		
Low	366	5.0	79,846	4.9			1.7
Moderate	1,582	21.7	399,624	24.5			13.0
<i>LMI Total</i>	1,948	26.7	479,470	29.4			14.7
Middle	3,043	41.8	630,166	38.6			46.3
Upper	2,294	31.5	521,244	31.9			39.0
N/A	3	0.0	688	0.0			
Total for 2004	7,288	100	1,631,568	100			

An analysis of the bank's HMDA-reportable loans in LMI areas *for its major MD and MSA market areas* follows:

MD 35644 - In 2003, the bank originated 6,767 HMDA loans totaling \$1.4 billion in this MD, including 1,484 (21.9%) loans totaling almost \$307 million (22.3%) in LMI census tracts. The bank's LMI penetration rates based on number and dollar volume of loans were significantly higher than the aggregate's rates of 14.3%, and 14.4%, respectively. In 2004, BNY originated 5,070 HMDA loans totaling \$1.2 billion in this MD, including 1,483 (29.3%) loans totaling \$390.9 million (32.6%) in LMI census tracts. These figures indicate that, although the number of loans to LMI geographies was relatively unchanged between years, the LMI penetration rate increased substantially.

MD 35004 - During 2003, BNY originated 2,072 HMDA loans totaling \$457.4 million in this MD, of which 328 (15.8%) loans totaling \$69.2 million (15.1%) were in LMI census tracts. The bank's percentages were similar to the aggregate's rates of 15.9% and 13.3%. In 2004, the bank extended 1,472 HMDA-reportable loans totaling \$326.5 million, of which 309 (21.0%) loans totaling \$68.1 million (20.9%) were extended in LMI census tracts. These figures indicate a decrease in the number of loan originations in LMI geographies, but an increased LMI penetration rate between years.

MSA 39100 - During 2003, BNY originated 566 HMDA loans totaling \$94.9 million in this MSA, of which 131 (23.1%) loans totaling \$17.9 million (18.8%) were in LMI census tracts. BNY's penetration rates were significantly higher than the 10.3% and 8.2%, respectively, achieved by the market aggregate. In 2004, the bank extended 582 HMDA loans totaling \$84.8 million, which includes 147 (25.3%) loans totaling \$19.6 million (23.1%) in LMI census tracts. These figures indicate an increase in both the number of loans and LMI penetration rates to LMI geographies between years of the evaluation period.

Small Business Loans

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area.

Please refer to exhibits 5.7 and 5.8, entitled "Small Business Lending," for the data used in evaluating the geographic distribution of BNY's small business loan originations.

In 2003, the bank extended 12.6% by number and 12.8% by dollar volume of its small business loans in LMI areas, which is lower than the aggregate's LMI penetration rate of 17.8% by number and 17.1% by dollar volume. The bank's penetration rate improved in 2004 to 13.3% by number but the dollar volume rate remained the same.

The table below illustrates the distribution of small business loans by geographic income level for 2003 and 2004.

Distribution of Small Business Loans by Census Tract Income Level						
Census Tract	BNY 2003				AGGREGATE 2003	
	#	% by #	\$000	% by \$	% by #	% by \$
Low	97	2.1	6,248	2.3	3.5	3.2
Moderate	480	10.5	28,790	10.5	14.3	13.9
<i>LMI Total</i>	577	12.7	35,038	12.8	17.8	17.1
Middle	1,728	38.0	87,706	32.1	36.2	33.4
Upper	2,218	48.7	149,507	54.7	45.3	48.0
N/A	28	0.6	902	0.3	0.7	1.4
Total for 2003	4,551	100	273,153	100	100	100
Census Tract	BNY 2004				AGGREGATE 2004	
	#	% by #	\$000	% by \$	Unavailable	
Low	80	1.9	3,267	1.8		
Moderate	485	11.4	19,806	10.8		
<i>LMI Total</i>	565	13.3	23,073	12.5		
Middle	1,575	37.1	66,596	36.2		
Upper	2,083	49.1	92,000	50.0		
N/A	23	0.5	2,270	1.2		
Total for 2004	4,246	100	183,939	100		

An analysis of the bank's small business loans in LMI areas by MD and MSA market areas follows:

MD 35644 - The bank had a poor small business lending penetration in LMI geographies within this MD. In 2003, BNY originated 2,644 small business loans for \$173.5 million in MD 35644, including 282 (10.7%) loans for \$17.4 million (10%) in LMI geographies. The bank's LMI area penetration rates were significantly lower than the corresponding aggregate rates of 20.1% and 18.4%. In 2003 and 2004, BNY originated 22.7% and 26.1%, respectively, of its total businesses loans in LMI tracts. During 2004, the bank's penetration rates by number and dollar volume of loans increased slightly to 11.9% and 11.5%, respectively.

MD 35004 - The bank's geographic distribution of small business loans in this MSA was good. In 2003, BNY originated 1,448 small business loans for \$73.5 million, which includes 223 (15.4%) small business loans for \$13 million (17.7%) in LMI geographies. The bank's LMI penetration rates were higher than the corresponding aggregate LMI rates of 13.8% and 14.4%. In 2004, the penetration rate by number of loans remained as 15.6%, but the rate by dollar volume decreased to 13.8%. The bank's penetration percentages were good in comparison to the percentage of total businesses located in LMI tracts: 13.5% in 2003 and 13% in 2004.

MSA 39100 - The bank's geographic distribution of small business loans in this MSA was good. In 2003, BNY originated 396 small business loans totaling \$23.8 million in this area. The total for 2003 includes 69 (17.4%) small business loans for \$4.4 million (18.4%) in LMI geographies. The bank's LMI penetration rate in loan volume was slightly higher than the corresponding aggregate LMI rate of 17.2% and lower than the aggregate's rate in dollar volume of 20.2%. In 2004, the bank's rates declined by number and dollar volume of loans to 15.6% and 16.6%, respectively. BNY's penetration percentages were comparable to the percentage of total businesses located in LMI tracts: 20.7% and 21% in 2003 and 2004, respectively.

Borrower Characteristics: "High Satisfactory"

Given BNY's product offerings, the bank's distribution of loans reflects good penetration among customers of different income levels and businesses of different sizes.

HMDA-reportable Loans

Refer to exhibits 5.5 and 5.6 titled "1-4 Family HMDA Loan Originations – Borrower Income Level Distribution" for the loan data used to evaluate the borrower distribution of the bank's HMDA-reportable loan originations.

As shown in the table below, the bank had a good distribution of HMDA loans among borrowers of different income levels, including good lending penetration with LMI borrowers. The chart excludes loans where borrower income was not considered in the underwriting process and therefore will not match the exhibits.

In 2003, BNY originated 9,481 one- to four-family loans in its New York State assessment area, including 1,341 (14.1%) loans extended to LMI individuals. This percentage is slightly lower than the 14.5% penetration rate achieved by the market aggregate.

In 2004, the bank originated 7,273 one- to four-family loans, of which 1,488 (20.5%) loans were made to LMI individuals. These figures indicate that the number of loans to LMI borrowers increased moderately between years of the evaluation period, while the LMI penetration rate increased substantially.

Distribution of HMDA Reportable Loans by Borrower Income Level (Excluding Loans Where Income Was Not Considered in Underwriting Decision)							
Borrower Income	BNY 2003		AGGREGATE 2003		BNY 2004		AGGREGATE 2004
	#	% by #	#	% by #	#	% by #	Unavailable
Low	243	2.8	12,630	2.9	297	4.5	
Moderate	1,098	12.9	57,755	13.1	1,191	17.9	
<i>LMI Total</i>	1,341	15.7	70,385	15.9	1,488	22.4	
Middle	2,185	25.6	111,181	25.2	1,913	28.8	
Upper	5,010	58.7	260,115	58.9	3,237	48.8	
Total	8,536	100	441,681	100	6,638	100	

An analysis of the bank's HMDA-reportable loans to LMI borrowers by MD and MSA market areas follows:

MD 35644 - The distribution of HMDA-reportable loans in this MD was good. In 2003, BNY originated 6,753 HMDA-reportable loans in this MD, including 593 loans (8.8%) made to LMI individuals, which is significantly higher than the 5.8% penetration rate achieved by the aggregate. In 2004, the bank originated 5,062 HMDA loans, which includes 761 loan (15.0%) loans made to LMI individuals. These figures indicate an increase in both the number of loans and the LMI penetration rate between years of the evaluation period.

MD 35004 - The distribution of HMDA-reportable loans to borrowers of different income levels was good in this MD. In 2003, BNY originated 2,067 HMDA-reportable loans here, including 586 loans (28.4%) made to LMI individuals, bettering the aggregate's performance of 24.2%. In 2004, the bank made 1,467 HMDA-reportable loans, of which 516 (35.2%) were made to LMI individuals. These figures indicate a decrease in the number of loans to LMI borrowers, but an increased LMI penetration rate between years of the evaluation period.

MSA 39100 - The borrower income distribution of HMDA-reportable loans in this MSA was good. During 2003, the bank originated 565 HMDA-reportable loans in this MSA, of which 146 (25.8%) loans were made to LMI individuals, significantly higher than 19.2% for the aggregate. In 2004, BNY made 580 loans in this MSA, of which 186 (32.1%) were made to LMI individuals. These figures indicate an increase in both the number of loans and LMI penetration rate to LMI borrowers between 2003 and 2004.

Small Business Loans

In 2003, BNY originated approximately 66% by number and 42% by dollar volume of its small business loans to businesses with gross annual revenue of \$1 million or less. The aggregate's corresponding ratios in 2003 were approximately 39% in volume and 40% in dollars. The bank's 2004 ratios were almost unchanged from the prior year.

BNY Distribution of Small Business Lending among Businesses of Different Sizes										
Business Revenue Size	BNY 2003				Aggregate 2003²		BNY 2004			
	#	% by #	\$000	% by \$	% by #	% by \$	#	% by #	\$000	% by \$
Firms with Revenues <= \$1 million	2,990	65.7	115,105	42.1	39.2	40.1	2,762	65.0	78,799	42.8
Firms with Revenues > \$1 million	1,429	31.4	150,428	55.1	N/A	N/A	1,344	31.7	93,287	50.7
Firms with Unreported Revenues	132	2.9	7,620	2.8	N/A	N/A	140	3.3	11,853	6.4
Total	4,551	100.0	273,153	100.0	100.0	100.0	4,246	100.0	183,939	100.0

An analysis of the bank's loans to small businesses by MD and MSA market areas follows:

MD 35644 - The bank's distribution of small business loans was excellent. In 2003, the bank originated approximately 64.6% by number and 39.6% by dollar volume of its small business loans to businesses with gross annual revenue of \$1 million or less. The aggregate's corresponding ratios for the same period were approximately 39.8% and 40.2% respectively. In 2004, the bank maintained its ratios at the same level.

MD 35004 - The bank had an excellent distribution of small business loans. In 2003, the bank originated approximately 64.6% by number and 42.4% by dollar volume of its small business loans to businesses with gross annual revenue of \$1 million or less. The aggregate's corresponding ratios for the same period were approximately 38.9% and 39.3% respectively. In 2004, the bank's ratios remained at approximately at the same level.

MSA 39100 - The bank had an excellent distribution of small business loans. In 2003, the bank originated approximately 75.5% by number and 57.7% by dollar volume of its small business loans to businesses with gross annual revenue of \$1 million or less. The aggregate's corresponding ratios for the same period were approximately 35.6% and 42.4%, respectively. In 2004, the bank's ratios decreased to 71.3% and 50.0%, respectively.

² The percentages of aggregate loans to businesses with revenue greater than \$1 million and to firms with unknown revenues were not available to the writer.

Community Development Loans: “Outstanding”

BNY’s is a leader in making community development loans.

During the evaluation period, the bank continued to demonstrate strong leadership in community development lending as indicated by its excellent level of community development loans, which totaled \$824.6 million as of December 31, 2004. The total includes approximately \$711.3 million (86.3%) in “new money” extended since the prior evaluation period.

Between evaluations, BNY’s total community development loan (“CDL”) portfolio grew by \$253.8 million or 44.5%. The bank provided a majority (56.5%) of its total CDL commitments in support of affordable housing initiatives. Loans to support the revitalization and stabilization of LMI neighborhoods accounted for 33.4% of total CDLs, while funding for community development services and economic development efforts accounted for 7% and 3%, respectively. Over 65% of the bank’s new commitments supported projects and programs in MD 35644 and 24% addressed general CDL needs throughout the assessment area.

The following chart details the purpose of the bank’s community development lending:

BNY Community Development Loans							
MD/MSA	Number of Outstanding Loans	Dollar Volume (000's)	Number of New Loans	Dollar Volume (000's)	New Dollar Volume Pct.	Total Dollar Volume Credit	Dollar Volume Percentage Per MD/MSA
35644	29	70,500	68	467,465	86.9	537,965	65.2
35004	3	10,500	10	34,357	76.6	44,857	5.4
39100	4	21,232	11	20,536	49.2	41,768	5.1
28740	0	0	0	0	N/A	0	0.0
Non-MSA	0	0	2	1,966	100.0	1,966	0.2
All AA	4	10,998	12	187,000	94.4	197,998	24.0
Total	40	113,230	103	711,324	86.3	824,554	100.0

In its continued efforts to provide financing for affordable housing and economic development projects in LMI communities, the bank has focused on facilitating:

- LMI housing development and rehabilitation
- Construction lending, interim financing, and permanent financing
- Letters of credit
- Commercial revitalization projects in LMI communities
- Community development loans to nonprofit organizations.

Many of the CDLs and community development letters of credit provided by BNY demonstrated innovative and/or complex-lending practices used by the bank in responding to the credit needs of its assessment area. The following brief examples demonstrate BNY’s responsiveness:

-
- Courtlandt Development Group, LLC (“CDG”) – BNY extended a \$4.4 million construction loan to the CDG to build twelve multifamily homes. The New Foundations Program, a program of New York City’s Department of Housing Preservation and Development (“HPD”), was designed to provide developers with maximum flexibility and encourage smaller developers to create affordable housing units. Sales are conducted through a lottery coordinated between HPD and the particular community sponsor, in this case, *Nos Quedamos*. The new homes will occupy former city-owned lots within the Melrose Commons Urban Renewal Zone in the Bronx. The bank worked with an existing relationship, but on a subsidized project in a different market, within a streamlined HPD program. Although the equity level was below what BNY would typically consider in a construction loan, that factor was offset by the bank’s knowledge and familiarity with the experience and track record of the borrower’s principals as contractors and marketing agents. The transaction brought multifamily affordable housing and stabilization to a renewal zone.
 - Coolidge 545 South, LLC (“Coolidge”) - The bank originated a \$ 2 million loan for the acquisition of a 40-unit apartment building located in Peekskill, New York (Westchester County). At closing, the 6-story building operated under a U.S. Department of Housing and Urban Development (“HUD”) program with subsidized Section 8 tenancy. The building’s owners were opting out of the HUD program, but all tenants received vouchers that enabled them to stay in their units due to an overall shortage of affordable housing in Westchester County. BNY demonstrated its flexibility and innovation with this transaction by financing a project while the building was undergoing a change in rent subsidy programs. BNY also provided flexible pricing alternatives to Coolidge.
 - Hempstead Properties, LLC – BNY offered a \$13.6 million credit enhancement in the form of a letter of credit to support bonds issued by the Industrial Development Agency of Nassau County. The bonds financed the acquisition and conversion of an existing hotel to create 105 units of affordable housing for seniors, along with some retail space and parking. Upon completion, the apartments will be rented under HUD’s project-based Assistance Housing Choice Voucher Program. As part of this transaction, BNY demonstrated its flexibility in structuring underwriting guidelines to recognize a borrower’s limited experience with HUD-operated buildings in low-income areas. BNY’s innovative and flexible approach to this transaction enabled the loan to close and provided 106 senior housing apartments to an area of Long Island in dire need of affordable housing.

Innovative and Flexible Lending Practices - Outstanding

BNY made extensive use of innovative and/or flexible lending practices in serving the assessment area’s credit needs during the evaluation period.

The bank offers wide-ranging mortgage options through the BNY Affordable Housing Program, Federal National Mortgage Association, State of New York Mortgage Authority, Federal Housing Authority, and Veteran Affairs Home Loan Guaranty Program. The following chart lists the number and dollar volume of residential products exhibiting innovative and/or flexible underwriting features extended during the evaluation period:

BNY Innovative and/or Flexible Lending Products				
Description	#	% by #	\$000	% by \$
MAPS	6,637	59.9	1,724,551	70.1
BNY CRA Portfolio	3,459	31.2	508,985	20.7
Reverse Mortgage	636	5.7	165,072	6.7
SONYMA	312	2.8	54,665	2.2
Homestyle Mortgage	21	0.2	6,013	0.2
Community Lending	7	0.1	2,171	0.1
Sub-Prime Rescue	2	0.0	255	0.0
FHA 203 (K) Mortgage	1	0.0	143	0.0
Total	11,075	100.0	2,461,855	100.0

The following product descriptions illustrate a few of the innovative and flexible products BNY employs to create more lending opportunities throughout the assessment area:

- *Mortgage Alternative Products Program (“MAPS”)*: - The MAPS program, utilizes an alternate credit-decision model that allows BNY to evaluate borrowers with non-traditional credit profiles and permits the verification of income in a non-traditional manner. This program helps to break down barriers faced by new immigrants seeking homeownership. The product allows more flexibility related to down payment (sources, documentation and amount), income sources, and residency. While new immigrants are the focus of this program, U.S. citizens and permanent residents are also eligible to participate.
- *BNY CRA Portfolio*: - BNY CRA Portfolio loans provide discounted financing to LMI borrowers or to borrowers buying or refinancing homes in LMI census tracts. The product offers greater flexibility in qualifying and underwriting standards.

The New Immigrant Initiative helps to facilitate homeownership. The product allows more flexibility related to down payment (sources, documentation and amount), income sources, and residency. While new immigrants are the focus of this program, U.S. citizens and permanent residents are also eligible to participate.
- *Reverse Mortgage Program*: - BNY is a leading reverse mortgage lender. Reverse mortgages allow older homeowners to convert a portion of the equity in their homes to cash. The loan does not have to be repaid until the borrower no longer occupies the property as their principal residence. The

products are designed to benefit homeowners who are 62 years of age and have little or no outstanding debt. BNY promotes these loans for home improvement purposes.

- *State of New York Mortgage Agency (“SONYMA”)*: - SONYMA is a public-private partnership with the NYS Housing Finance Agency (“HFA”) and its affiliates, the Affordable Housing Corporation (“AHC”) and the Mortgage Insurance Fund (“MIF”). Through the issuance of tax-exempt and taxable bonds, it provides participating lenders with a secondary market for low down payment, below-market rate mortgages to first-time homebuyers who have completed an approved homebuyer education program. Eligible applicants must satisfy certain income requirements and the properties to be acquired cannot exceed certain price limits.
- *FHA 203(k) Mortgage*: - Section 203(k) of the National Housing Act enables HUD to promote and facilitate the restoration and preservation of the nation’s existing housing stock. This loan program is FHA-insured and provides both acquisition and renovation financing in a single loan. Borrowers of all income levels are eligible. Under this program, a product called the “StoreWorks Initiative” is made available to rehabilitate certain mixed-use properties.

In addition, BNY provides financing for community groups and nonprofit organizations to purchase residential properties that need rehabilitation, then helps the organizations find qualified borrowers (typically first-time homebuyers) to purchase the properties upon completion of the renovations.

As indicated in the preceding chart, the bank’s most popular programs have been MAPS and the BNY CRA Portfolio, which account for approximately 60% and 30%, respectively, of all originations categorized as flexible and/or innovative.

BNY refers homeowner-applicants who have been declined for a personal loan request to the bank’s alternative Credit Option program. This program was established to assist applicants who do not qualify for the bank’s core product offerings but may benefit from the Credit Option real estate secured program. BNY utilizes a partner, Mortgage Lender Network (“MLN”), which underwrites and originates the alternative product on behalf of the bank. The loan is originated in the bank’s name and subsequently sold to MLN within two weeks. The borrowers are evaluated under an alternative set of credit criteria for products with terms that differ from the bank’s core products. Products in the program offer consumers who have blemished credit histories an opportunity to repair their credit.

During the evaluation period, BNY extended 733 Credit Option loans totaling \$66.3 million in the tri-state area.

II. Investment Test: - “Outstanding”

This test evaluates the bank's record of helping to meet the needs of its assessment area through qualified investments. Qualified investments are evaluated based on their dollar volume, their innovation or complexity, their responsiveness to community development needs, and the degree to which these investments are not routinely provided by private investors.

BNY has booked an excellent level of qualified community development investments. During the evaluation period, qualified investments totaled \$370.7 million, including \$195.6 million (52.8%) in new money. The total also includes 232 CRA-qualified grants, totaling \$2.1 million, awarded to a variety of social, educational, housing and community organizations.

Most of BNY’s investments were Low-Income Housing Tax Credits (“LIHTCs”). These tax credits were created by Congress in 1986 to promote the development of rental housing affordable to low-income households. The tax credit provides a dollar-for-dollar reduction in federal income tax liability for owners of, or investors in, qualified low-income rental housing developments.

The following chart details the bank’s qualified investments:

BNY Qualified Investments in Dollar Volume							
MD/MSA	Affordable Housing	Economic Development	Community Service	Revitalize & Stabilize	New Money	% New Money	Total Credit
35644	226,110,502	505,100	796,300	11,100	134,391,698	59.1	227,423,002
35004	78,842,410	13,100	29,500	0	3,205,100	4.1	78,885,010
39100	32,770,776	1,500	2,500	0	29,427,148	89.8	32,774,776
28740	1,700	0	0	0	1,700	100	1,700
Non-MSA	1,500	0	0	0	1,500	100	1,500
Not in AA	31,651,856	0	0	0	28,574,420	90.3	31,651,856
Total	369,378,744	519,700	828,300	11,100	195,601,566	52.8	370,737,844

During the evaluation period, BNY invested \$19.9 million in tax credit properties in Buffalo and \$5.9 million in a 250-unit LIHTC located in North Tonawanda, Niagara County. The bank also invested \$2.7 million in an LIHTC residence supporting 36 one- and two-room homes located in Fredonia, Chautauqua County. BNY maintains an outstanding balance from the prior evaluation of \$3.1 million invested in support of a housing development in Elmira, Chemung County.

These investments constitute 8.6% of the bank’s total investments and support affordable housing in parts of New York State that are beyond the assessment area. The LIHTCs supplement and support BNY’s already outstanding record of meeting the needs of its assessment area.

III. Service Test: - “Low Satisfactory”

The service test evaluates the bank’s record of helping to meet the credit needs of its assessment area by analyzing both the availability and effectiveness of the bank’s systems for delivering retail banking services and the extent and innovativeness of its community development services.

- **Retail Banking Services:** “Low Satisfactory”

BNY’s delivery systems are accessible to most portions of the bank’s assessment area; however, there are noteworthy gaps in the bank’s network.

BNY has no branch presence in Bronx County and just one branch in Kings County. Individuals living in LMI geographies in these two counties cannot easily access BNY’s branch system. These two counties have a total of 646 LMI census tracts, which account for 59.8% of the LMI census tracts within the bank’s New York assessment area. In New York County (Manhattan), all branches are located south of 74th Street.

In the remaining counties where BNY maintains offices, the bank’s delivery systems are readily accessible. Approximately 61% (147) of the bank’s branches are located in three counties: Westchester, Nassau and Suffolk. In Westchester, BNY has a commanding branch presence of 62 offices. BNY also maintains a strong branch presence throughout Dutchess, Queens, Orange and Rockland counties.

BNY Branch Location by County and Census Tract as of 12/31/2004 (Based on 2004 Revisions by the U.S. Office of Management and Budget)								
County or MD/MSA	Census Tract Income Level					% of Total BNY Branches	LMI Adjacent Branches	In or Adjacent to LMI (% per County or MSA)
	Low	Moderate	Middle	Upper	Total			
Kings	0	0	0	1	1	0.4	1	100.0
Bronx	0	0	0	0	0	N/A	N/A	N/A
New York	0	0	1	18	19	7.9	0	0.0
Queens	0	4	8	5	17	7.1	6	58.8
Westchester	0	9	10	43	62	25.7	10	30.6
Rockland	0	0	2	20	22	9.1	5	22.7
Putnam	0	0	0	1	1	0.4	0	0.0
MD 35644	0	13	21	88	122	50.6	22	28.7
Nassau	0	1	33	10	44	18.3	7	18.2
Suffolk	1	8	25	7	41	17.0	13	53.7
MD 35004	1	9	58	17	85	35.3	20	35.3
Dutchess	2	1	9	1	13	5.4	5	61.5
Orange	1	1	11	3	16	6.6	5	43.8
MSA 39100	3	2	20	4	29	12.0	10	51.7
Ulster	0	0	3	0	3	1.2	2	66.7
Sullivan	0	0	2	0	2	0.8	0	0.0
Assessment Area	4	24	104	109	241	100.0	54	34.0
% by Category	1.7	10.0	43.2	45.2	100.0			

The table above summarizes BNY's branch locations by county and census tract income level. It also reflects branches that are physically located in middle- or upper-income areas adjacent to LMI census tracts. As indicated in the table, 34% of BNY's branches are located within or adjacent to LMI census tracts.

Record of Opening and Closing of Branches

BNY's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.

During the evaluation period, BNY opened one employee branch, relocated one branch and consolidated two branches within New York State. The new employee branch is located in an upper-income census tract in Kings County, part of MD 35644. This location also houses one of BNY's business operation centers. The relocated branch was in a non-adjacent upper-income census tract in New York County and the consolidation affecting two branches were in upper-income census tracts (not adjacent to LMI tracts) in Rockland County. There were no branch closings during the evaluation period.

Special Products

BNY offered the following retail deposit products that benefit LMI individuals and small businesses:

- Individual Development Account – Matching funds savings account opened by a non-profit organization on behalf of its individual clients. During the evaluation period, the bank opened one lead account and five sub-accounts in New York.
- Basic Checking Account – BNY offers an alternative basic banking transaction account which is more advantageous to the consumer than is mandated by NYS regulation. This account is suitable for individuals who keep low minimum balances and who have minimal transaction needs. The account carries no minimum balance requirement and a low monthly fee. During the evaluation period, the bank had 36,934 active accounts.
- Group Banking – This is an employee-sponsored program that offers a comprehensive financial package of free and discounted banking benefits. Participants in this program are eligible for discounted rates on loans and can receive up to \$500 off their mortgage closing costs. During the evaluation period, the bank had approximately 30 thousand active accounts in New York.

Alternative Delivery Systems

BNY's alternative delivery systems are reasonably accessible throughout its assessment area.

Of the total branches, 201 (83.4%) had ATMs that were available during and after banking hours and 20 (10%) of these branches were located in LMI areas. These ATMs were available around-the-clock in English and Spanish. BNY is a member of the NYCE, CIRRUS, PLUS, Discover and AMEX ATM networks. In addition, BNY had 18 off-site non-deposit taking and four deposit-taking ATM facilities located at various schools, hospitals and business locations within the New York State assessment area. The 22 off-site ATM facilities were located in the following counties: New York (ten); Westchester (five); Bronx (two); Kings (two); Suffolk (two) and Putnam (one).

BNY offers the following alternative delivery systems:

- The bank offers toll-free telephone banking which allows a customer to obtain current account information, transfer funds, stop payment, pay a loan, or access a customer service representative 24 hours a day. Through BNY's centralized Customer Service Unit, customers can establish additional accounts. The bank has expanded this service to non-customers looking to establish a new consumer relationship with BNY.
- BNY can be reached at its web site address (www.bankofny.com) where consumers can download application forms and calculate payments. The site also describes products and services and has a listing of all branches and ATMs. The bank's Internet banking (BNY On-Line) provided real time account information, bill payment, current financial news and stock quotes. The business On-Line service has been enhanced to include sub-user capabilities to allow the owner the convenience of designating authority to employees such as bookkeepers.
- The bank has extended its network of Business and Professional Centers in its New York State assessment area to a total of 55 with all but one located at standing branches. The 36 centers located in MD 35644 are in: New York (12), Queens (5), Kings (2), Westchester (14) and Rockland (3). MD 35004 has 16 business centers divided evenly between Nassau and Suffolk while MSA 39100 has two and one centers in Orange and Dutchess counties, respectively.

Selected Centers have resource areas with information kiosks. These kiosks provide access to the bank's website, enable customers to perform account analyses, and allow business customers to network with each other.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's business hours and services do not vary in a way that inconveniences certain portions of its assessment area, particularly LMI geographies and/or LMI individuals.

BNY offers extended banking hours at 214 (88.8%) branches, including 117 locations (54.7%) where Saturday business hours are provided.

Community Development Services: “High Satisfactory”

BNY provides a relatively high level of community development services.

During the evaluation period, the bank through partnership with community development organizations, local government entities and various civic organizations, sponsored and presented a high volume of seminars and workshops addressing diverse topics on mortgage lending, small business, financial literacy and other basic financial education. The bank’s volume of activities remained at relatively the same level since the previous evaluation.

Following are examples of the bank’s community development service activities during the evaluation period:

First-time Homebuyer Seminars and Mortgage Fairs – BNY participated in six first-time homebuyer fairs and mortgage seminars geared towards LMI individuals and families within the assessment area. Harlem Congregations for Community Improvement, Inc., Westchester Interfaith Housing Corporation, and Westchester Residential Opportunities were three of the community organizations that hosted the seminars.

Small Business Seminars / Workshops – BNY participated in 13 small business development workshops held within the assessment area during the evaluation period. Five of the presentations were made at the workshops hosted by the Brooklyn Chamber of Commerce Business Expo, The Greater New York Chamber of Commerce, National Minority Business Council, African-American Chamber of Commerce, and Yonkers Business Week Small Business Expo.

Financial Literacy – During the evaluation period, BNY participated in six programs that provide financial literacy training to LMI children and adults, designed to build savings for financial security. The following is a brief description of each of the six programs:

- *New York City Financial Services Partnership For Youth (FSPY)* – The bank is a founding member and a longstanding supporter of FSPY. FSPY provides career development, job training and internships for unemployed and underemployed young people ages 17 to 22 years old. Through partnerships with government agencies, the private sector and community-based organizations, participants receive intensive training in work readiness, financial education and job-related technical skills.
- *Operation Hope, Inc. “Banking on Our Future”*. This program teaches economic literacy in middle and high schools throughout New York City.
- *Credit Where Credit is Due, Inc. “School Banking Program.”* The bank was the lead supporter of this program. The overall objective is to raise the self-esteem and competitiveness of low-income young people and teach the value of accumulating savings. The program is geared towards fourth and fifth graders.

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- *Hunts Point Economic Development Corporation (“HPEDC”) “University in the Market Learning Center” (Center)*. The bank provided grants to the Center, which was created by HPEDC to provide financial, computer, and English literacy programs for the Hunts Point Empire Zone business employees. The program is a collaborative effort involving employers, foundations, colleges, and the HPEDC.
 - *Coalition for Consumer Bankruptcy Debtor Education “Financial Workshops”*. BNY partnered with this NFP organization by conducting financial workshops in Kings and New York counties for LMI individuals filing for personal bankruptcy. The goal is to improve the lives of debtors after they emerge from bankruptcy by creating and providing financial management systems for them.
 - *American Banker’s Association Education Foundation “Teach Children to Save” program*. The bank partnered with an elementary school in Mount Vernon (Westchester County) that serves LMI children with financial workshops focusing on developing good savings habits.

During the evaluation period, BNY’s directors, officers and employees participated in approximately 30 community development organizations serving as board members, treasurers and financial advisors in a capacity related to the provision of financial services. The following is a sample of these organizations:

- Bronx Economic Development Corporation – a vice president is a member of economic development committee member
- Long Island Development Corporation – an assistant vice president is a member of loan committee member
- Business Outreach Network, Inc. – a vice president is a member of the loan committee

IV. Discrimination or Other Illegal Practices

BNY practices intended to discourage applications for types of credit set forth in the banking institution’s CRA Public File.

No practices intended to discourage applications for the types of credit offered by the institution were noted.

Evidence of prohibited discriminatory or other illegal credit practices.

The most recent regulatory compliance and fair lending examinations, conducted concurrently with this evaluation, indicate satisfactory performance in terms of adherence to anti-discrimination or other applicable laws and regulations. No evidence of prohibited discrimination or other illegal credit practices was noted.

V. Process Factors

Activities conducted by the banking institution to ascertain the credit needs of its community, including the extent of the banking institution's efforts to communicate with members of its community regarding the credit services being provided by the banking institution.

The Community Development Division ("CDD") coordinates the bank's CRA programs and initiatives and assists both lending and non-lending divisions of the bank in generating business development opportunities throughout BNY's assessment area.

The CDD's Community Development Relationship Managers participate as members of boards of directors and advisory boards of community-based organizations, thereby focusing management and line-officers' attention to community and business opportunities. Bank officers participate in home ownership and small business fairs as exhibitors and/or panelists where they have direct contact and discussions with potential borrowers, public officials, for profit and nonprofit developers of affordable housing and representatives of community-based organizations with regards to the community's credit needs.

Officers of the bank regularly attend various community-based initiatives sponsored by the Federal Reserve Bank of New York and New York State Banking Department. These initiatives include Child-Care Initiatives, Affordable Housing Initiatives, and Financial Literacy initiatives.

The extent of the banking institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the banking institution.

The Marketing Division of BNY coordinates with CDD and the bank's various lending divisions to market the bank's products and banking services.

In 2003 and 2004, the bank attempted to increase lending opportunities through focused direct marketing, community outreach and localized advertising of its lending products and services within the bank's assessment area, with a focused penetration within targeted LMI area.

The bank participates in homebuyer, small business, and other seminars to promote its products and services. The bank also uses its branch office network including its Business Centers in marketing its products and services through brochures, signs, and information directly disseminated by branch office personnel. The bank has brochures in Spanish describing its banking services and its mortgage application process.

BNY regularly advertises in minority print media including the *African-American Observer*, the *New York Amsterdam News*, *Carib News* as well as Spanish-language media including *La Voz Hispana*, *Hoy* and *El Nuevo Hudson*. The bank marketed to LMI individuals by

advertising in the *Westchester Journal*, *Long Island Newsday* and the *Middletown Times*.

The extent of participation by the banking institution's board of directors in formulating the banking institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

The Board of Directors has been active in the oversight of CRA and consumer compliance. At least twice per year, the Board of Directors reviews and approves the CRA policy of the bank. The Board also receives regular reports on the bank's CRA performance.

The board has an established CRA/Fair Lending Committee to oversee the implementation of the bank's CRA and fair lending policies. This committee meets, at a minimum, twice per year to monitor the bank's CRA performance and to recommend ways to enhance its CRA activities. The committee is responsible for approving the annual CRA Business Plan and for reviewing the annual CRA policy, as well as other CRA documentation, before being submitted to the overall Board for approval.

BNY maintains a permanent CRA Officer position. The CRA Officer has the day-to-day responsibility of managing and ensuring that the bank's performance meets the requirements of the Community Reinvestment Act and its implementing regulations. In addition, the CRA Officer will keep senior management and appropriate bank personnel informed on new government or lending opportunities.

The Community Reinvestment Act/Fair Lending Planning Committee's coordinates and enhances managerial oversight of the bank's CRA and fair lending efforts. The committee is responsible for approving CRA goals, overseeing the development and implementation of CRA policies and procedures, and reviewing CRA activities such as outreach, marketing, lending, investment, and service and administrative activities, and overseeing CRA compliance. Membership on the committee includes representatives from other areas of the bank that are directly responsible for carrying out the bank's CRA responsibilities. The committee meets 11 times annually to discuss the bank's CRA efforts and prepares reports for senior management and the CRA/Fair Lending Committee of the Board of Directors.

VI. Other Factors

Other factors that in the judgement of the Superintendent and Banking Board, bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community.

None.

HMDA LOAN ORIGINATIONS¹
YEAR 2003

GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

County/Area	Geography Income Level	Home Purchase				Refinancing			Home Improvement			Multifamily			Total						
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %				
Nassau	low	2	0.65	71	0.41	1	0.15	154	0.25	0	0.00	1	0.05	1	100.00	3	5.36	4	0.40	229	0.29
	moderate	26	8.47	1,330	7.66	27	4.08	3,587	5.91	4	13.79	128	6.40	0	0.00	8	14.29	57	5.71	5,053	6.31
	middle	190	61.89	11,809	68.02	447	67.62	42,067	69.30	21	72.41	1,588	79.44	0	0.00	39	69.64	658	65.93	55,503	69.27
	upper	89	28.99	4,151	23.91	186	28.14	14,899	24.54	4	13.79	282	14.11	0	0.00	6	10.71	279	27.96	19,338	24.14
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	10.5 total	307	100.00	17,361	100.00	661	100.00	60,707	100.00	29	100.00	1,999	100.00	1	100.00	56	100.00	998	100.00	80,123	100.00
Suffolk	low	2	0.48	122	0.49	2	0.33	237	0.27	0	0.00	15	0.33	0	0.00	0	0.00	4	0.37	374	0.32
	moderate	124	29.74	6,650	26.72	132	21.78	17,648	20.40	6	12.77	1,165	25.35	1	25.00	9	19.57	263	24.49	25,472	21.95
	middle	251	60.19	14,789	59.42	380	62.71	55,736	64.41	36	76.60	2,960	64.42	3	75.00	34	73.91	670	62.38	73,519	63.35
	upper	40	9.59	3,327	13.37	92	15.18	12,908	14.92	5	10.64	455	9.90	0	0.00	3	6.52	137	12.76	16,693	14.38
	zero & NAs	0	0.00	0	0.00	0	0.00	1	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1	0.00
	11.3 total	417	100.00	24,888	100.00	606	100.00	86,530	100.00	47	100.00	4,595	100.00	4	100.00	46	100.00	1,074	100.00	116,059	100.00
MD 35004	low	4	0.55	193	0.46	3	0.24	391	0.27	0	0.00	16	0.24	1	20.00	3	2.94	8	0.39	603	0.31
	moderate	150	20.72	7,980	18.89	159	12.55	21,235	14.42	10	13.16	1,293	19.61	1	20.00	17	16.67	320	15.44	30,525	15.56
	middle	441	60.91	26,598	62.96	827	65.27	97,803	66.43	57	75.00	4,548	68.97	3	60.00	73	71.57	1,328	64.09	129,022	65.77
	upper	129	17.82	7,478	17.70	278	21.94	27,807	18.89	9	11.84	737	11.18	0	0.00	9	8.82	416	20.08	36,031	18.37
	zero & NAs	0	0.00	0	0.00	0	0.00	1	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1	0.00
	21.8 total	724	100.00	42,249	100.00	1,267	100.00	147,237	100.00	76	100.00	6,594	100.00	5	100.00	102	100.00	2,072	100.00	196,182	100.00
Bronx	low	36	17.39	660	12.77	6	6.59	937	9.70	4	57.14	59	13.98	0	0.00	217	40.56	46	15.08	1,873	11.87
	moderate	69	33.33	1,345	26.03	21	23.08	2,052	21.24	0	0.00	110	26.07	0	0.00	236	44.11	90	29.51	3,743	23.71
	middle	40	19.32	1,570	30.39	28	30.77	3,250	33.64	2	28.57	148	35.07	0	0.00	64	11.96	70	22.95	5,032	31.88
	upper	62	29.95	1,586	30.69	35	38.46	3,410	35.30	1	14.29	103	24.41	0	0.00	16	2.99	98	32.13	5,115	32.41
	zero & NAs	0	0.00	6	0.12	1	1.10	11	0.11	0	0.00	2	0.47	0	0.00	2	0.37	1	0.33	21	0.13
	3.2 total	207	100.00	5,167	100.00	91	100.00	9,660	100.00	7	100.00	422	100.00	0	0.00	535	100.00	305	100.00	15,784	100.00
Kings	low	76	10.57	1,231	8.16	86	8.54	1,662	5.21	2	5.56	60	5.12	0	0.00	193	14.76	164	9.31	3,146	6.36
	moderate	262	36.44	4,654	30.86	379	37.64	9,032	28.33	18	50.00	338	28.84	0	0.00	637	48.70	659	37.40	14,661	29.65
	middle	288	40.06	4,998	33.14	388	38.53	11,077	34.74	8	22.22	474	40.44	0	0.00	315	24.08	684	38.82	16,864	34.10
	upper	92	12.80	4,157	27.56	153	15.19	10,020	31.42	8	22.22	299	25.51	0	0.00	160	12.23	253	14.36	14,636	29.60
	zero & NAs	1	0.14	42	0.28	1	0.10	96	0.30	0	0.00	1	0.09	0	0.00	3	0.23	2	0.11	142	0.29
	18.5 total	719	100.00	15,082	100.00	1,007	100.00	31,887	100.00	36	100.00	1,172	100.00	0	0.00	1,308	100.00	1,762	100.00	49,449	100.00
New York	low	19	7.63	310	2.29	11	5.14	295	1.24	1	25.00	13	6.95	0	0.00	97	8.67	31	6.57	715	1.85
	moderate	42	16.87	956	7.07	20	9.35	1,456	6.13	3	75.00	46	24.60	0	0.00	252	22.52	65	13.77	2,710	7.02
	middle	14	5.62	813	6.01	17	7.94	994	4.19	0	0.00	14	7.49	0	0.00	129	11.53	31	6.57	1,950	5.05
	upper	171	68.67	11,293	83.51	162	75.70	20,653	86.96	0	0.00	105	56.15	5	100.00	632	56.48	338	71.61	32,683	84.72
	zero & NAs	3	1.20	151	1.12	4	1.87	351	1.48	0	0.00	9	4.81	0	0.00	9	0.80	7	1.48	520	1.35
	5.0 total	249	100.00	13,523	100.00	214	100.00	23,749	100.00	4	100.00	187	100.00	5	100.00	1,119	100.00	472	100.00	38,578	100.00
Putnam	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	middle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	upper	29	100.00	1,785	100.00	62	100.00	5,914	100.00	1	100.00	189	100.00	0	0.00	4	100.00	92	100.00	7,892	100.00
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	1.0 total	29	100.00	1,785	100.00	62	100.00	5,914	100.00	1	100.00	189	100.00	0	0.00	4	100.00	92	100.00	7,892	100.00
Queens	low	3	0.27	128	0.60	1	0.08	149	0.36	0	0.00	9	0.58	0	0.00	1	0.20	4	0.17	287	0.44
	moderate	160	14.65	2,351	11.09	210	17.51	3,692	8.85	3	7.89	114	7.36	0	0.00	179	36.02	373	16.01	6,336	9.75
	middle	510	46.70	9,760	46.04	584	48.71	18,274	43.80	17	44.74	727	46.96	1	100.00	268	53.92	1,112	47.73	29,029	44.69
	upper	418	38.28	8,935	42.15	401	33.44	19,568	46.90	18	47.37	696	44.96	0	0.00	49	9.86	837	35.92	29,248	45.02
	zero & NAs	1	0.09	23	0.11	3	0.25	37	0.09	0	0.00	2	0.13	0	0.00	0	0.00	4	0.17	62	0.10
	24.5 total	1,092	100.00	21,197	100.00	1,199	100.00	41,720	100.00	38	100.00	1,548	100.00	1	100.00	497	100.00	2,330	100.00	64,962	100.00
Rockland	low	3	2.56	43	1.02	13	6.91	115	0.83	0	0.00	0	0.00	0	0.00	3	12.50	16	4.85	161	0.87
	moderate	0	0.00	17	0.40	2	1.06	49	0.35	0	0.00	4	0.80	0	0.00	0	0.00	2	0.61	70	0.38
	middle	29	24.79	600	14.17	35	18.62	1,130	8.19	2	8.00	32	6.43	0	0.00	4	16.67	66	20.00	1,766	9.51
	upper	85	72.65	3,575	84.42	138	73.40	12,510	90.63	23	92.00	462	92.77	0	0.00	17	70.83	246	74.55	16,564	89.24
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	3.5 total	117	100.00	4,235	100.00	188	100.00 </														

HMDA LOAN ORIGINATIONS¹

YEAR 2003

GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS

County/Area % of Total A/A Loans	Geography Income Level	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Dutchess MSA 39100	low	2	2.63	145	3.37	1	1.11	254	1.87	0	0.00	21	2.77	0	0.00	3	16.67	3	1.79	423	2.26
	moderate	9	11.84	444	10.31	15	16.67	1,078	7.93	1	100.00	72	9.49	0	0.00	7	38.89	25	14.88	1,601	8.57
	middle	52	68.42	2,735	63.50	48	53.33	8,757	64.40	0	0.00	518	68.25	1	100.00	6	33.33	101	60.12	12,016	64.32
	upper	13	17.11	983	22.82	26	28.89	3,508	25.80	0	0.00	147	19.37	0	0.00	2	11.11	39	23.21	4,640	24.84
	zero & NAs	0	0.00	0	0.00	0	0.00	1	0.01	0	0.00	1	0.13	0	0.00	0	0.00	0	0.00	2	0.01
	1.8 total	76	100.00	4,307	100.00	90	100.00	13,598	100.00	1	100.00	759	100.00	1	100.00	18	100.00	168	100.00	18,682	100.00
Orange MSA 39100	low	27	16.98	268	4.39	35	14.77	362	2.41	0	0.00	14	1.58	0	0.00	3	11.11	62	15.54	647	2.93
	moderate	26	16.35	619	10.13	15	6.33	825	5.49	0	0.00	58	6.55	0	0.00	8	29.63	41	10.28	1,510	6.85
	middle	77	48.43	3,393	55.55	96	40.51	8,189	54.46	1	50.00	489	55.25	1	100.00	13	48.15	175	43.86	12,084	54.79
	upper	29	18.24	1,828	29.93	91	38.40	5,660	37.64	1	50.00	324	36.61	0	0.00	3	11.11	121	30.33	7,815	35.43
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	3.7 total	159	100.00	6,108	100.00	237	100.00	15,036	100.00	2	100.00	885	100.00	1	100.00	27	100.00	399	100.00	22,056	100.00
Ulster* MSA 28740	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	1	5.00	81	4.07	0	0.00	117	2.29	0	0.00	8	2.30	0	0.00	2	20.00	1	2.38	208	2.79
	middle	7	35.00	844	42.41	10	47.62	2,005	39.22	0	0.00	147	42.24	0	0.00	3	30.00	17	40.48	2,999	40.20
	upper	12	60.00	1,065	53.52	11	52.38	2,990	58.49	1	100.00	193	55.46	0	0.00	5	50.00	24	57.14	4,253	57.01
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.5 total	20	100.00	1,990	100.00	21	100.00	5,112	100.00	1	100.00	348	100.00	0	0.00	10	100.00	42	100.00	7,460	100.00
Sullivan* Non-MSA	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	3	10.34	55	8.50	1	4.00	95	7.30	0	0.00	16	16.33	0	0.00	0	0.00	4	7.41	166	8.11
	middle	20	68.97	422	65.22	13	52.00	829	63.72	0	0.00	62	63.27	0	0.00	2	100.00	33	61.11	1,315	64.21
	upper	6	20.69	170	26.28	11	44.00	377	28.98	0	0.00	20	20.41	0	0.00	0	0.00	17	31.48	567	27.69
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.7 total	29	100.00	647	100.00	25	100.00	1,301	100.00	0	0.00	98	100.00	0	0.00	2	100.00	54	100.00	2,048	100.00
A/A Total	low	170	4.00	3,007	2.33	156	3.11	4,194	1.22	7	3.20	194	1.42	1	4.76	526	13.63	334	3.52	7,921	1.61
	moderate	749	17.64	18,841	14.62	827	16.48	40,291	11.70	35	15.98	2,083	15.26	3	14.29	1,387	35.93	1,614	16.99	62,602	12.76
	middle	1,630	38.40	53,171	41.27	2,103	41.92	155,302	45.11	92	42.01	7,271	53.27	7	33.33	948	24.56	3,832	40.33	216,692	44.17
	upper	1,689	39.79	53,581	41.59	1,922	38.31	143,948	41.82	85	38.81	4,087	29.94	10	47.62	985	25.52	3,706	39.00	202,601	41.30
	zero & NAs	7	0.16	232	0.18	9	0.18	511	0.15	0	0.00	15	0.11	0	0.00	14	0.36	16	0.17	772	0.16
100.0 total	4,245	100.00	128,832	100.00	5,017	100.00	344,246	100.00	219	100.00	13,650	100.00	21	100.00	3,860	100.00	9,502	100.00	490,588	100.00	

* The bank takes only that part of the county, MD or MSA in its assessment area

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); 2000 Census with 2003 tract definition (geography income levels); and FFIEC (aggregate data)

HMDA LOAN ORIGINATIONS ¹											
YEAR 2004											
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS											
County/Area % of Total A/A Loans	Geography Income Level	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
		Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %
Nassau	low	1	0.31	1	0.45	0	0.00	2	66.67	4	0.64
	moderate	23	7.19	25	11.31	2	2.53	1	33.33	51	8.19
	middle	218	68.13	153	69.23	65	82.28	0	0.00	436	69.98
	upper	78	24.38	42	19.00	12	15.19	0	0.00	132	21.19
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	8.5 total	320	100.00	221	100.00	79	100.00	3	100.00	623	100.00
Suffolk	low	4	1.00	3	1.15	2	1.08	0	0.00	9	1.06
	moderate	117	29.25	85	32.57	41	22.04	2	100.00	245	28.86
	middle	239	59.75	149	57.09	124	66.67	0	0.00	512	60.31
	upper	40	10.00	24	9.20	19	10.22	0	0.00	83	9.78
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	11.6 total	400	100.00	261	100.00	186	100.00	2	100.00	849	100.00
MD 35004	low	5	0.69	4	0.83	2	0.75	2	40.00	13	0.88
	moderate	140	19.44	110	22.82	43	16.23	3	60.00	296	20.11
	middle	457	63.47	302	62.66	189	71.32	0	0.00	948	64.40
	upper	118	16.39	66	13.69	31	11.70	0	0.00	215	14.61
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	20.2 total	720	100.00	482	100.00	265	100.00	5	100.00	1,472	100.00
Bronx	low	31	13.54	11	14.86	5	20.00	0	0.00	47	14.33
	moderate	107	46.72	27	36.49	9	36.00	0	0.00	143	43.60
	middle	52	22.71	19	25.68	5	20.00	0	0.00	76	23.17
	upper	39	17.03	17	22.97	6	24.00	0	0.00	62	18.90
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	4.5 total	229	100.00	74	100.00	25	100.00	0	0.00	328	100.00
Kings	low	75	9.26	43	12.29	16	14.55	0	0.00	134	10.55
	moderate	304	37.53	153	43.71	49	44.55	0	0.00	506	39.84
	middle	307	37.90	107	30.57	29	26.36	0	0.00	443	34.88
	upper	122	15.06	47	13.43	16	14.55	0	0.00	185	14.57
	zero & NAs	2	0.25	0	0.00	0	0.00	0	0.00	2	0.16
	17.4 total	810	100.00	350	100.00	110	100.00	0	0.00	1,270	100.00
New York	low	70	22.08	6	7.59	2	14.29	0	0.00	78	18.80
	moderate	93	29.34	11	13.92	2	14.29	1	20.00	107	25.78
	middle	13	4.10	5	6.33	0	0.00	0	0.00	18	4.34
	upper	141	44.48	57	72.15	10	71.43	4	80.00	212	51.08
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	5.7 total	317	100.00	79	100.00	14	100.00	5	100.00	415	100.00
Putnam	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	middle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	upper	35	100.00	18	100.00	11	100.00	0	0.00	64	100.00
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.9 total	35	100.00	18	100.00	11	100.00	0	0.00	64	100.00
Queens	low	4	0.37	3	0.68	2	1.63	0	0.00	9	0.55
	moderate	262	24.30	112	25.28	17	13.82	0	0.00	391	23.78
	middle	580	53.80	224	50.56	64	52.03	0	0.00	868	52.80
	upper	232	21.52	104	23.48	40	32.52	0	0.00	376	22.87
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	22.6 total	1,078	100.00	443	100.00	123	100.00	0	0.00	1,644	100.00
Rockland	low	3	2.22	2	2.94	0	0.00	0	0.00	5	2.02
	moderate	2	1.48	4	5.88	1	2.27	0	0.00	7	2.83
	middle	34	25.19	11	16.18	6	13.64	0	0.00	51	20.65
	upper	96	71.11	51	75.00	37	84.09	0	0.00	184	74.49
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	3.4 total	135	100.00	68	100.00	44	100.00	0	0.00	247	100.00
Westchester	low	2	0.25	0	0.00	0	0.00	1	33.33	3	0.27
	moderate	42	5.23	7	3.52	3	3.09	1	33.33	53	4.81
	middle	172	21.42	36	18.09	17	17.53	0	0.00	225	20.42
	upper	586	72.98	156	78.39	77	79.38	1	33.33	820	74.41
	zero & NAs	1	0.12	0	0.00	0	0.00	0	0.00	1	0.09
	15.1 total	803	100.00	199	100.00	97	100.00	3	100.00	1,102	100.00
MD 35644*	low	185	5.43	65	5.28	25	5.90	1	12.50	276	5.44
	moderate	810	23.77	314	25.51	81	19.10	2	25.00	1,207	23.81
	middle	1,158	33.99	402	32.66	121	28.54	0	0.00	1,681	33.16
	upper	1,251	36.72	450	36.56	197	46.46	5	62.50	1,903	37.53
	zero & NAs	3	0.09	0	0.00	0	0.00	0	0.00	3	0.06
	69.6 total	3,407	100.00	1,231	100.00	424	100.00	8	100.00	5,070	100.00

HMDA LOAN ORIGINATIONS ¹											
YEAR 2004											
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS											
County/Area % of Total A/A Loans	Geography Income Level	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
		Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %
Dutchess	low	7	8.86	3	5.88	0	0.00	0	0.00	10	5.81
	moderate	8	10.13	5	9.80	1	2.50	1	50.00	15	8.72
	middle	51	64.56	36	70.59	23	57.50	1	50.00	111	64.53
	upper	13	16.46	7	13.73	16	40.00	0	0.00	36	20.93
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	1.7 total	79	100.00	51	100.00	40	100.00	2	100.00	172	100.00
Orange	low	43	20.09	21	18.10	3	3.75	0	0.00	67	16.34
	moderate	31	14.49	17	14.66	7	8.75	0	0.00	55	13.41
	middle	92	42.99	53	45.69	49	61.25	0	0.00	194	47.32
	upper	48	22.43	25	21.55	21	26.25	0	0.00	94	22.93
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	4.7 total	214	100.00	116	100.00	80	100.00	0	0.00	410	100.00
MSA 39100	low	50	17.06	24	14.37	3	2.50	0	0.00	77	13.23
	moderate	39	13.31	22	13.17	8	6.67	1	50.00	70	12.03
	middle	143	48.81	89	53.29	72	60.00	1	50.00	305	52.41
	upper	61	20.82	32	19.16	37	30.83	0	0.00	130	22.34
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	6.5 total	293	100.00	167	100.00	120	100.00	2	100.00	582	100.00
Ulster*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	1	4.17	1	5.56	0	0.00	0	0.00	2	3.64
	middle	18	75.00	13	72.22	9	69.23	0	0.00	40	72.73
	upper	5	20.83	4	22.22	4	30.77	0	0.00	13	23.64
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.5 total	24	100.00	18	100.00	13	100.00	0	0.00	55	100.00
Sullivan*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	2	2.74	4	16.00	1	9.09	0	0.00	7	6.42
	middle	47	64.38	15	60.00	7	63.64	0	0.00	69	63.30
	upper	24	32.88	6	24.00	3	27.27	0	0.00	33	30.28
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	1.6 total	73	100.00	25	100.00	11	100.00	0	0.00	109	100.00
A/A Total	low	240	5.31	93	4.84	30	3.60	3	20.00	366	5.02
	moderate	992	21.96	451	23.45	133	15.97	6	40.00	1,582	21.71
	middle	1,823	40.36	821	42.69	398	47.78	1	6.67	3,043	41.75
	upper	1,459	32.30	558	29.02	272	32.65	5	33.33	2,294	31.48
	zero & NAs	3	0.07	0	0.00	0	0.00	0	0.00	3	0.04
	100.0 total	4,517	100.00	1,923	100.00	833	100.00	15	100.00	7,288	100.00

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); and 2000 Census with 2004 tract definition (geography income levels).

HMDA LOAN ORIGINATIONS¹

YEAR 2003

GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS

County/Area	Geography % of Total A/A Loans	Home Purchase				Refinancing				Home Improvement				Multifamily				Total				
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	
Nassau	low	80	0.10	14,420	0.28	180	0.13	28,986	0.21	0	0.00	15	0.01	6,000	100.00	11,450	10.07	6,260	2.76	54,871	0.29	
	moderate	3,395	4.18	294,204	5.64	4,815	3.45	665,363	4.90	17	7.30	5,001	3.64	0	0.00	41,306	36.31	8,227	3.63	1,005,874	5.28	
	middle	46,440	57.22	3,094,425	59.34	88,776	63.70	8,327,898	61.35	187	80.26	102,838	74.77	0	0.00	53,989	47.46	135,403	59.71	11,579,150	60.81	
	upper	31,243	38.50	1,811,864	34.74	45,600	32.72	4,551,616	33.53	29	12.45	29,677	21.58	0	0.00	7,013	6.16	76,872	33.90	6,400,170	33.61	
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
	11.7 total	81,158	100.00	5,214,913	100.00	139,371	100.00	13,573,863	100.00	233	100.00	137,531	100.00	6,000	100.00	113,758	100.00	226,762	100.00	19,040,065	100.00	
Suffolk	low	508	0.52	22,976	0.34	287	0.23	36,136	0.21	0	0.00	750	0.34	0	0.00	0	0.00	795	0.34	59,862	0.25	
	moderate	24,397	25.18	1,450,324	21.74	24,502	19.66	3,132,059	18.02	13	4.01	46,906	21.24	5,000	57.31	15,955	13.46	53,912	23.38	4,645,244	19.04	
	middle	57,562	59.40	4,023,426	60.31	78,642	63.09	10,983,464	63.19	255	78.70	140,121	63.44	3,725	42.69	101,385	85.51	140,184	60.79	15,248,396	62.51	
	upper	14,441	14.90	1,174,664	17.61	21,215	17.02	3,228,779	18.58	56	17.28	33,106	14.99	0	0.00	1,230	1.04	35,712	15.49	4,437,779	18.19	
	zero & NAs	0	0.00	0	0.00	0	0.00	350	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	350	0.00	
	11.9 total	96,908	100.00	6,671,390	100.00	124,646	100.00	17,380,788	100.00	324	100.00	220,883	100.00	8,725	100.00	118,570	100.00	230,603	100.00	24,391,631	100.00	
MD 35004	low	588	0.33	37,396	0.31	467	0.18	65,122	0.21	0	0.00	765	0.21	6,000	40.75	11,450	4.93	7,055	1.54	114,733	0.26	
	moderate	27,792	15.61	1,744,828	14.68	29,317	11.10	3,797,422	12.27	30	5.39	51,907	14.48	5,000	33.96	57,261	24.65	62,139	13.59	5,651,118	13.01	
	middle	104,002	58.41	7,117,851	59.88	167,418	63.41	19,311,362	62.39	442	79.35	242,959	67.79	3,725	25.30	155,374	66.88	275,587	60.26	26,827,546	61.77	
	upper	45,684	25.66	2,986,528	25.13	66,815	25.31	7,780,395	25.13	85	15.26	62,783	17.52	0	0.00	8,243	3.55	112,584	24.62	10,837,949	24.95	
	zero & NAs	0	0.00	0	0.00	0	0.00	350	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
	23.6 total	178,066	100.00	11,886,303	100.00	264,017	100.00	30,954,651	100.00	557	100.00	358,414	100.00	14,725	100.00	232,328	100.00	457,365	100.00	43,431,696	100.00	
Bronx	low	6,560	21.47	157,195	13.90	1,006	7.65	180,989	9.50	79	66.95	2,165	11.91	0	0.00	279,745	36.50	7,645	17.45	620,094	16.23	
	moderate	7,738	25.33	271,247	23.99	3,249	24.72	401,693	21.07	0	0.00	3,856	21.22	0	0.00	375,130	48.95	10,987	25.08	1,051,926	27.53	
	middle	7,071	23.14	347,060	30.70	4,456	33.90	640,090	33.58	5	4.24	6,586	36.24	0	0.00	92,190	12.03	11,532	26.32	1,085,926	28.42	
	upper	9,182	30.05	353,666	31.28	4,327	32.92	681,184	35.74	34	28.81	5,552	30.55	0	0.00	16,356	2.13	13,543	30.91	1,056,758	27.66	
	zero & NAs	0	0.00	1,378	0.12	105	0.80	2,092	0.11	0	0.00	15	0.08	0	0.00	3,000	0.39	105	0.24	6,485	0.17	
	2.3 total	30,551	100.00	1,130,546	100.00	13,143	100.00	1,906,048	100.00	118	100.00	18,174	100.00	0	0.00	766,421	100.00	43,812	100.00	3,821,489	100.00	
Kings	low	19,809	10.11	344,745	8.13	15,759	9.25	353,479	4.93	6	1.01	4,806	4.55	0	0.00	105,809	11.66	35,574	9.70	808,839	6.51	
	moderate	76,771	39.19	1,275,003	30.07	64,652	37.94	1,966,154	27.43	306	51.34	24,770	23.47	0	0.00	422,285	46.54	141,729	38.63	3,688,212	29.70	
	middle	74,149	37.85	1,301,892	30.71	62,382	36.60	2,446,793	34.14	171	28.69	46,791	44.33	0	0.00	235,160	25.92	136,702	37.26	4,030,636	32.45	
	upper	24,938	12.73	1,304,741	30.78	27,547	16.16	2,379,562	33.20	113	18.96	28,851	27.34	0	0.00	140,480	15.48	52,598	14.34	3,853,634	31.03	
	zero & NAs	220	0.11	13,116	0.31	80	0.05	21,169	0.30	0	0.00	323	0.31	0	0.00	3,575	0.39	300	0.08	38,183	0.31	
	18.9 total	195,887	100.00	4,239,497	100.00	170,420	100.00	7,167,157	100.00	596	100.00	105,541	100.00	0	0.00	907,309	100.00	366,903	100.00	12,419,504	100.00	
New York	low	5,924	7.75	80,714	1.48	1,960	2.80	80,215	1.02	3	3.06	991	4.90	0	0.00	138,731	4.33	7,887	5.13	300,651	1.82	
	moderate	7,383	9.65	272,213	5.00	5,877	8.39	379,420	4.80	95	96.94	2,702	13.37	0	0.00	442,291	13.80	13,355	8.69	1,096,626	6.62	
	middle	3,091	4.04	222,937	4.10	3,214	4.59	218,213	2.76	0	0.00	1,074	5.31	0	0.00	345,971	10.80	6,305	4.10	788,195	4.76	
	upper	58,170	76.05	4,741,895	87.18	57,497	82.13	7,007,917	88.70	0	0.00	11,808	58.41	7,050	100.00	2,261,040	70.57	122,717	79.87	14,022,660	84.66	
	zero & NAs	1,920	2.51	121,422	2.23	1,463	2.09	215,141	2.72	0	0.00	3,640	18.01	0	0.00	15,969	0.50	3,383	2.20	356,172	2.15	
	7.9 total	76,488	100.00	5,439,181	100.00	70,011	100.00	7,900,906	100.00	98	100.00	20,215	100.00	7,050	100.00	3,204,002	100.00	153,647	100.00	16,564,304	100.00	
Putnam	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
	moderate	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
	middle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
	upper	7,389	100.00	450,725	100.00	10,715	100.00	1,162,301	100.00	13	100.00	14,252	100.00	0	0.00	2,011	100.00	18,117	100.00	1,629,289	100.00	
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
	0.9 total	7,389	100.00	450,725	100.00	10,715	100.00	1,162,301	100.00	13	100.00	14,252	100.00	0	0.00	2,011	100.00	18,117	100.00	1,629,289	100.00	
Queens	low	502	0.19	29,172	0.56	210	0.10	27,375	0.32	0	0.00	432	0.54	0	0.00	8,500	1.49	712	0.15	65,479	0.45	
	moderate	36,010	13.73	601,958	11.56	36,811	17.72	846,817	9.92	59	12.02	5,952	7.39	0	0.00	156,563	27.42	72,880	15.18	1,611,290	11.19	
	middle	116,399	44.39	2,350,625	45.15	105,152	50.61	3,713,261	43.50	235	47.86	33,850	42.05	9,700	100.00	289,699	50.74	231,486	48.21	6,387,435	44.37	
	upper	108,971	41.56	2,220,022	42.64	64,951	31.26	3,940,974	46.17	197	40.12	40,042	49.75	0	0.00	116,166	20.35	174,119	36.26	6,317,204	43.89	
	zero & NAs	323	0.12	5,046	0.10	640	0.31	7,655	0.09	0	0.00	215	0.27	0	0.00	0	0.00	963	0.20	12,916	0.09	
	24.7 total	262,205	100.00	5,206,823	100.00	207,764	100.00	8,536,082	100.00	491	100.00	80,491	100.00	9,700								

HMDA LOAN ORIGINATIONS¹

YEAR 2003

GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS

County/Area	Geography % of Total A/A Loans	Home Purchase				Refinancing				Home Improvement				Multifamily				Total			
		Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %	Bank \$	Bank %	Agg. \$	Agg. %
Dutchess	low	83	0.72	17,736	2.05	157	0.95	26,955	1.25	0	0.00	990	3.15	0	0.00	2,664	6.31	240	0.86	48,345	1.56
	moderate	557	4.85	73,137	8.47	2,300	13.96	143,471	6.65	5	100.00	2,815	8.94	0	0.00	22,190	52.57	2,862	10.24	241,613	7.81
	middle	7,085	61.75	529,126	61.30	9,408	57.10	1,355,287	62.79	0	0.00	20,386	64.77	0	0.00	16,434	38.94	16,493	59.00	1,921,233	62.07
	upper	3,749	32.67	243,185	28.17	4,612	27.99	632,463	29.30	0	0.00	7,272	23.11	0	0.00	920	2.18	8,361	29.91	883,840	28.55
	zero & NAs	0	0.00	0	0.00	0	0.00	207	0.01	0	0.00	10	0.03	0	0.00	0	0.00	0	0.00	217	0.01
1.2	total	11,474	100.00	863,184	100.00	16,477	100.00	2,158,383	100.00	5	100.00	31,473	100.00	0	0.00	42,208	100.00	27,956	100.00	3,095,248	100.00
Orange	low	4,146	15.56	31,803	2.86	6,285	15.72	48,137	2.04	0	0.00	414	1.08	0	0.00	638	3.91	10,431	15.58	80,992	2.30
	moderate	2,405	9.03	73,930	6.66	1,922	4.81	89,708	3.80	0	0.00	1,739	4.54	0	0.00	7,924	48.59	4,327	6.46	173,301	4.92
	middle	13,207	49.58	581,629	52.37	14,491	36.24	1,182,671	50.12	1	4.76	20,244	52.85	300	100.00	7,155	43.87	27,999	41.82	1,791,699	50.83
	upper	6,879	25.82	423,271	38.11	17,293	43.24	1,038,981	44.03	20	95.24	15,910	41.53	0	0.00	592	3.63	24,192	36.13	1,478,754	41.95
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
2.8	total	26,637	100.00	1,110,633	100.00	39,991	100.00	2,359,497	100.00	21	100.00	38,307	100.00	300	100.00	16,309	100.00	66,949	100.00	3,524,746	100.00
Ulster*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	94	2.74	8,272	2.61	0	0.00	10,477	1.56	0	0.00	215	1.44	0	0.00	180	2.59	94	1.55	19,144	1.89
	middle	1,161	33.80	114,528	36.08	1,296	49.18	237,534	35.29	0	0.00	5,765	38.63	0	0.00	4,135	59.55	2,457	40.47	361,962	35.75
	upper	2,180	63.46	194,636	61.32	1,339	50.82	425,033	63.15	1	100.00	8,942	59.92	0	0.00	2,629	37.86	3,520	57.98	631,240	62.35
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
0.4	total	3,435	100.00	317,436	100.00	2,635	100.00	673,044	100.00	1	100.00	14,922	100.00	0	0.00	6,944	100.00	6,071	100.00	1,012,346	100.00
Sullivan*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	416	10.38	5,721	7.53	83	3.21	10,539	7.42	0	0.00	1,057	26.05	0	0.00	0	0.00	499	7.57	17,317	7.65
	middle	2,389	59.64	46,423	61.09	1,050	40.63	85,338	60.10	0	0.00	2,162	53.29	0	0.00	4,300	100.00	3,439	52.19	138,223	61.07
	upper	1,201	29.98	23,852	31.39	1,451	56.15	46,110	32.47	0	0.00	838	20.66	0	0.00	0	0.00	2,652	40.24	70,800	31.28
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
0.4	total	4,006	100.00	75,996	100.00	2,584	100.00	141,987	100.00	0	0.00	4,057	100.00	0	0.00	4,300	100.00	6,590	100.00	226,340	100.00
A/A Total	low	38,250	4.03	716,388	2.00	29,182	3.10	815,103	1.08	88	3.64	10,575	1.33	6,000	12.28	551,885	9.12	73,520	3.79	2,093,951	1.77
	moderate	162,197	17.09	4,400,605	12.28	145,395	15.46	7,789,550	10.34	495	20.47	96,299	12.11	12,900	26.41	1,544,539	25.51	320,987	16.54	13,830,993	11.72
	middle	351,212	37.01	13,032,324	36.36	383,912	40.82	30,013,109	39.83	962	39.78	385,782	48.52	15,325	31.37	1,251,583	20.67	751,411	38.72	44,682,798	37.85
	upper	394,620	41.59	17,551,035	48.97	379,674	40.37	36,492,484	48.43	873	36.10	298,286	37.51	14,626	29.94	2,684,030	44.33	789,793	40.70	57,025,835	48.31
	zero & NAs	2,650	0.28	142,231	0.40	2,288	0.24	248,177	0.33	0	0.00	4,203	0.53	0	0.00	22,544	0.37	4,938	0.25	417,155	0.35
0.0	total	948,929	100.00	35,842,583	100.00	940,451	100.00	75,358,423	100.00	2,418	100.00	795,145	100.00	48,851	100.00	6,054,581	100.00	1,940,649	100.00	118,050,732	100.00

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); 2000 Census with 2003 tract definition (geography income levels); and FFIEC (aggregate data)

HMDA LOAN ORIGINATIONS ¹											
YEAR 2004											
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS											
County/Area	Geography Income Level	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
		Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %
Nassau	low	316	0.35	125	0.24	0	0.00	10,138	88.71	10,579	6.62
	moderate	3,892	4.30	4,662	8.89	19	0.34	1,290	11.29	9,863	6.17
	middle	56,619	62.62	33,979	64.81	4,522	80.89	0	0.00	95,120	59.50
	upper	29,584	32.72	13,662	26.06	1,049	18.77	0	0.00	44,295	27.71
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
9.8	total	90,411	100.00	52,428	100.00	5,590	100.00	11,428	100.00	159,857	100.00
Suffolk	low	825	0.91	747	1.33	173	1.17	0	0.00	1,745	1.05
	moderate	21,628	23.81	15,996	28.54	3,302	22.35	5,000	100.00	45,926	27.56
	middle	57,886	63.72	33,020	58.91	8,722	59.05	0	0.00	99,628	59.78
	upper	10,501	11.56	6,288	11.22	2,574	17.43	0	0.00	19,363	11.62
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10.2	total	90,840	100.00	56,051	100.00	14,771	100.00	5,000	100.00	166,662	100.00
MD 35004	low	1,141	0.63	872	0.80	173	0.85	10,138	61.71	12,324	3.77
	moderate	25,520	14.08	20,658	19.04	3,321	16.31	6,290	38.29	55,789	17.09
	middle	114,505	63.17	66,999	61.76	13,244	65.05	0	0.00	194,748	59.64
	upper	40,085	22.12	19,950	18.39	3,623	17.79	0	0.00	63,658	19.50
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20.0	total	181,251	100.00	108,479	100.00	20,361	100.00	16,428	100.00	326,519	100.00
Bronx	low	7,384	19.78	2,390	14.74	301	54.43	0	0.00	10,075	18.62
	moderate	11,742	31.45	6,026	37.17	79	14.29	0	0.00	17,847	32.99
	middle	10,885	29.15	4,332	26.72	23	4.16	0	0.00	15,240	28.17
	upper	7,325	19.62	3,466	21.38	150	27.12	0	0.00	10,941	20.22
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
3.3	total	37,336	100.00	16,214	100.00	553	100.00	0	0.00	54,103	100.00
Kings	low	16,521	7.10	11,458	12.40	1,955	12.24	0	0.00	29,934	8.78
	moderate	94,309	40.53	43,053	46.60	8,364	52.38	0	0.00	145,726	42.73
	middle	86,866	37.33	26,460	28.64	4,098	25.66	0	0.00	117,424	34.43
	upper	34,520	14.84	11,419	12.36	1,551	9.71	0	0.00	47,490	13.92
	zero & NAs	469	0.20	0	0.00	0	0.00	0	0.00	469	0.14
20.9	total	232,685	100.00	92,390	100.00	15,968	100.00	0	0.00	341,043	100.00
New York	low	9,674	11.79	1,483	5.03	324	19.78	0	0.00	11,481	9.13
	moderate	18,163	22.13	3,023	10.25	94	5.74	5,605	43.76	26,785	21.29
	middle	3,068	3.74	820	2.78	0	0.00	0	0.00	3,888	3.09
	upper	51,153	62.34	24,180	81.95	1,220	74.48	7,075	56.24	83,628	66.49
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
7.7	total	82,058	100.00	29,506	100.00	1,638	100.00	12,580	100.00	125,782	100.00
Putnam	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	middle	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	upper	8,331	100.00	5,067	100.00	750	100.00	0	0.00	14,148	100.00
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
#DIV/0!	total	8,331	100.00	5,067	100.00	750	100.00	0	0.00	14,148	100.00
Queens	low	1,285	0.46	683	0.62	43	0.36	0	0.00	2,011	0.50
	moderate	66,537	23.77	31,566	28.65	1,979	16.57	0	0.00	100,082	24.89
	middle	144,992	51.79	54,385	49.33	6,314	52.85	0	0.00	205,691	51.15
	upper	67,121	23.98	23,622	21.42	3,610	30.22	0	0.00	94,353	23.46
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24.6	total	279,935	100.00	110,256	100.00	11,946	100.00	0	0.00	402,137	100.00
Rockland	low	776	2.68	288	2.12	0	0.00	0	0.00	1,064	2.35
	moderate	518	1.79	996	7.34	23	0.82	0	0.00	1,537	3.39
	middle	4,643	16.06	1,743	12.85	228	8.14	0	0.00	6,614	14.81
	upper	22,974	79.46	10,536	77.68	2,551	91.04	0	0.00	36,061	79.65
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
2.8	total	28,911	100.00	13,563	100.00	2,802	100.00	0	0.00	45,276	100.00
Westchester	low	309	0.22	0	0.00	0	0.00	1,322	3.49	1,631	0.75
	moderate	5,984	4.35	1,253	3.54	438	6.18	35,062	92.55	42,737	19.61
	middle	23,419	17.02	7,041	19.90	916	12.95	0	0.00	31,376	14.40
	upper	107,673	78.25	27,091	76.56	5,733	80.67	1,500	3.96	141,997	65.15
	zero & NAs	219	0.16	0	0.00	0	0.00	0	0.00	219	0.10
13.4	total	137,604	100.00	35,385	100.00	7,089	100.00	37,884	100.00	217,962	100.00
MD 35644*	low	35,949	4.46	16,302	5.39	2,623	6.44	1,322	2.82	56,196	4.68
	moderate	197,253	24.45	85,917	28.41	10,977	26.94	40,567	80.39	334,714	27.88
	middle	273,873	33.94	94,781	31.34	11,581	28.42	0	0.00	380,235	31.67
	upper	299,097	37.07	105,381	34.85	15,565	38.20	8,575	16.99	428,618	35.70
	zero & NAs	688	0.09	0	0.00	0	0.00	0	0.00	688	0.06
73.6	total	806,860	100.00	302,381	100.00	40,746	100.00	50,464	100.00	1,200,451	100.00

HMDA LOAN ORIGINATIONS ¹											
YEAR 2004											
GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS											
County/Area	Geography Income Level	Home Purchase		Refinancing		Home Improvement		Multifamily		Total	
		Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %	Bank \$	Bank %
Dutchess	low	523	3.96	331	4.27	0	0.00	0	0.00	854	3.60
	moderate	1,303	9.88	759	9.79	35	2.43	25	1.90	2,122	8.95
	middle	8,087	61.30	5,267	67.93	872	60.51	1,294	98.10	15,520	65.47
	upper	3,280	24.86	1,397	18.02	534	37.06	0	0.00	5,211	21.98
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	1.3 total	13,193	100.00	7,754	100.00	1,441	100.00	1,319	100.00	23,707	100.00
Orange	low	5,663	15.30	4,737	23.71	72	1.75	0	0.00	10,472	17.14
	moderate	4,102	11.08	1,797	8.99	279	6.78	0	0.00	6,178	10.11
	middle	15,823	42.76	8,515	42.62	2,454	59.64	0	0.00	26,792	43.85
	upper	11,417	30.85	4,931	24.68	1,310	31.83	0	0.00	17,658	28.90
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	3.5 total	37,005	100.00	19,980	100.00	4,115	100.00	0	0.00	61,100	100.00
MSA 39100	low	6,186	12.32	5,068	18.27	72	1.30	0	0.00	11,326	13.36
	moderate	5,405	10.77	2,556	9.22	314	5.65	25	1.90	8,300	9.79
	middle	23,910	47.63	13,782	49.69	3,326	59.86	1,294	98.10	42,312	49.89
	upper	14,697	29.28	6,328	22.82	1,844	33.19	0	0.00	22,869	26.97
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	4.8 total	50,198	100.00	27,734	100.00	5,556	100.00	1,319	100.00	84,807	100.00
Ulster*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	65	1.78	156	5.27	0	0.00	0	0.00	221	3.07
	middle	3,044	83.17	2,248	75.97	288	48.81	0	0.00	5,580	77.40
	upper	551	15.05	555	18.76	302	51.19	0	0.00	1,408	19.53
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.3 total	3,660	100.00	2,959	100.00	590	100.00	0	0.00	7,209	100.00
Sullivan*	low	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	moderate	240	2.59	343	11.90	17	3.89	0	0.00	600	4.77
	middle	5,502	59.40	1,564	54.25	225	51.49	0	0.00	7,291	57.95
	upper	3,520	38.00	976	33.85	195	44.62	0	0.00	4,691	37.28
	zero & NAs	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
	0.9 total	9,262	100.00	2,883	100.00	437	100.00	0	0.00	12,582	100.00
A/A Total	low	43,276	4.12	22,242	5.00	2,868	4.24	11,460	16.80	79,846	4.89
	moderate	228,483	21.73	109,630	24.67	14,629	21.61	46,882	68.73	399,624	24.49
	middle	420,834	40.03	179,374	40.36	28,664	42.35	1,294	1.90	630,166	38.62
	upper	357,950	34.05	133,190	29.97	21,529	31.81	8,575	12.57	521,244	31.95
	zero & NAs	688	0.07	0	0.00	0	0.00	0	0.00	688	0.04
	100.0 total	1,051,231	100.00	444,436	100.00	67,690	100.00	68,211	100.00	1,631,568	100.00

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); and 2000 Census with 2004 tract definition (geography income levels)

1-4 FAMILY HMDA LOAN ORIGINATIONS ¹																	
YEAR 2003																	
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																	
County/Area	Borrower % of Total A/A Loans	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Nassau	low	17	5.54	342	1.97	20	3.03	2,173	3.58	0	0.00	129	6.45	37	3.71	2,644	3.30
	moderate	71	23.13	2,179	12.55	101	15.28	10,658	17.56	0	0.00	416	20.81	172	17.25	13,253	16.55
	middle	89	28.99	5,269	30.35	173	26.17	17,934	29.54	0	0.00	665	33.27	262	26.28	23,868	29.81
	upper	106	34.53	8,049	46.36	258	39.03	24,031	39.59	4	13.79	722	36.12	368	36.91	32,802	40.97
	zero & NAs	24	7.82	1,522	8.77	109	16.49	5,911	9.74	25	86.21	67	3.35	158	15.85	7,500	9.37
	10.5 total	307	100.00	17,361	100.00	661	100.00	60,707	100.00	29	100.00	1,999	100.00	997	100.00	80,067	100.00
Suffolk	low	49	11.75	853	3.43	47	7.76	4,922	5.69	2	4.26	479	10.42	98	9.16	6,254	5.39
	moderate	137	32.85	4,629	18.60	139	22.94	19,655	22.71	3	6.38	1,071	23.31	279	26.07	25,355	21.86
	middle	108	25.90	7,897	31.73	157	25.91	26,469	30.59	2	4.26	1,648	35.87	267	24.95	36,014	31.04
	upper	100	23.98	9,181	36.89	170	28.05	27,441	31.71	0	0.00	1,264	27.51	270	25.23	37,886	32.66
	zero & NAs	23	5.52	2,328	9.35	93	15.35	8,043	9.30	40	85.11	133	2.89	156	14.58	10,504	9.05
	11.3 total	417	100.00	24,888	100.00	606	100.00	86,530	100.00	47	100.00	4,595	100.00	1,070	100.00	116,013	100.00
MD 35004	low	66	9.12	1,195	2.83	67	5.29	7,095	4.82	2	2.63	608	9.22	135	6.53	8,898	4.54
	moderate	208	28.73	6,808	16.11	240	18.94	30,313	20.59	3	3.95	1,487	22.55	451	21.82	38,608	19.69
	middle	197	27.21	13,166	31.16	330	26.05	44,403	30.16	2	2.63	2,313	35.08	529	25.59	59,882	30.54
	upper	206	28.45	17,230	40.78	428	33.78	51,472	34.96	4	5.26	1,986	30.12	638	30.87	70,688	36.05
	zero & NAs	47	6.49	3,850	9.11	202	15.94	13,954	9.48	65	85.53	200	3.03	314	15.19	18,004	9.18
	21.8 total	724	100.00	42,249	100.00	1,267	100.00	147,237	100.00	76	100.00	6,594	100.00	2,067	100.00	196,080	100.00
Bronx	low	7	3.38	73	1.41	2	2.20	168	1.74	0	0.00	27	6.40	9	2.95	268	1.76
	moderate	46	22.22	436	8.44	10	10.99	739	7.65	0	0.00	62	14.69	56	18.36	1,237	8.11
	middle	72	34.78	1,074	20.79	28	30.77	2,300	23.81	0	0.00	116	27.49	100	32.79	3,490	22.89
	upper	68	32.85	3,136	60.69	46	50.55	5,470	56.63	0	0.00	198	46.92	114	37.38	8,804	57.73
	zero & NAs	14	6.76	448	8.67	5	5.49	983	10.18	7	100.00	19	4.50	26	8.52	1,450	9.51
	3.2 total	207	100.00	5,167	100.00	91	100.00	9,660	100.00	7	100.00	422	100.00	305	100.00	15,249	100.00
Kings	low	5	0.70	112	0.74	8	0.79	487	1.53	0	0.00	44	3.75	13	0.74	643	1.34
	moderate	41	5.70	759	5.03	51	5.06	2,148	6.74	0	0.00	105	8.96	92	5.22	3,012	6.26
	middle	157	21.84	2,405	15.95	180	17.87	6,374	19.99	1	2.78	251	21.42	338	19.18	9,030	18.76
	upper	483	67.18	10,157	67.35	718	71.30	19,200	60.21	2	5.56	704	60.07	1,203	68.27	30,061	62.44
	zero & NAs	33	4.59	1,649	10.93	50	4.97	3,678	11.53	33	91.67	68	5.80	116	6.58	5,395	11.21
	18.6 total	719	100.00	15,082	100.00	1,007	100.00	31,887	100.00	36	100.00	1,172	100.00	1,762	100.00	48,141	100.00
New York	low	0	0.00	13	0.10	2	0.93	62	0.26	0	0.00	7	3.74	2	0.43	82	0.22
	moderate	6	2.41	226	1.67	1	0.47	419	1.76	0	0.00	25	13.37	7	1.50	670	1.79
	middle	43	17.27	1,028	7.60	17	7.94	1,579	6.65	2	50.00	24	12.83	62	13.28	2,631	7.02
	upper	180	72.29	11,640	86.08	164	76.64	19,941	83.97	1	25.00	126	67.38	345	73.88	31,707	84.64
	zero & NAs	20	8.03	616	4.56	30	14.02	1,748	7.36	1	25.00	5	2.67	51	10.92	2,369	6.32
	4.9 total	249	100.00	13,523	100.00	214	100.00	23,749	100.00	4	100.00	187	100.00	467	100.00	37,459	100.00
Putnam	low	1	3.45	8	0.45	0	0.00	27	0.46	0	0.00	3	1.59	1	1.09	38	0.48
	moderate	2	6.90	49	2.75	4	6.45	213	3.60	0	0.00	9	4.76	6	6.52	271	3.44
	middle	7	24.14	246	13.78	9	14.52	924	15.62	0	0.00	30	15.87	16	17.39	1,200	15.21
	upper	17	58.62	1,401	78.49	36	58.06	4,220	71.36	0	0.00	142	75.13	53	57.61	5,763	73.06
	zero & NAs	2	6.90	81	4.54	13	20.97	530	8.96	1	100.00	5	2.65	16	17.39	616	7.81
	1.0 total	29	100.00	1,785	100.00	62	100.00	5,914	100.00	1	100.00	189	100.00	92	100.00	7,888	100.00
Queens	low	11	1.01	130	0.61	5	0.42	572	1.37	0	0.00	58	3.75	16	0.69	760	1.18
	moderate	94	8.61	1,260	5.94	66	5.50	3,139	7.52	1	2.63	160	10.34	161	6.91	4,559	7.07
	middle	278	25.46	4,188	19.76	255	21.27	9,213	22.08	2	5.26	401	25.90	535	22.97	13,802	21.41
	upper	674	61.72	13,111	61.85	813	67.81	23,960	57.43	1	2.63	849	54.84	1,488	63.89	37,920	58.82
	zero & NAs	35	3.21	2,508	11.83	60	5.00	4,836	11.59	34	89.47	80	5.17	129	5.54	7,424	11.52
	24.6 total	1,092	100.00	21,197	100.00	1,199	100.00	41,720	100.00	38	100.00	1,548	100.00	2,329	100.00	64,465	100.00
Rockland	low	2	1.71	16	0.38	2	1.06	82	0.59	0	0.00	5	1.00	4	1.21	103	0.56
	moderate	12	10.26	154	3.64	6	3.19	435	3.15	0	0.00	18	3.61	18	5.45	607	3.27
	middle	24	20.51	590	13.93	19	10.11	1,643	11.90	0	0.00	65	13.05	43	13.03	2,298	12.40
	upper	68	58.12	3,201	75.58	133	70.74	10,334	74.86	3	12.00	378	75.90	204	61.82	13,913	75.06
	zero & NAs	11	9.40	274	6.47	28	14.89	1,310	9.49	22	88.00	32	6.43	61	18.48	1,616	8.72
	3.5 total	117	100.00	4,235	100.00	188	100.00	13,804	100.00	25	100.00	498	100.00	330	100.00	18,537	100.00
Westchester	low	18	2.18	69	0.55	6	0.97	148	0.42	0	0.00	13	1.37	24	1.63	230	0.47
	moderate	149	18.08	555	4.43	33	5.36	856	2.43	2	7.14	39	4.11	184	12.53	1,450	2.98
	middle	278	33.74	1,547	12.33	100	16.23	3,254	9.24	1	3.57	121	12.74	379	25.82	4,922	10.10
	upper	331	40.17	9,603	76.57	375	60.88	27,362	77.67	1	3.57	796	77.47	707	48.16	37,701	77.36
	zero & NAs	48	5.83	768	6.12	102	16.56	3,608	10.24	24	85.71	41	4.32	174	11.85	4,417	9.07
	15.5 total	824	100.00	12,542	100.00	616	100.00	35,228	100.00	28	100.00	950	100.00	1,468	100.00	48,720	100.00
MD 35644*	low	44	1.36	421	0.57	25	0.74	1,546	0.95	0	0.00	157	3.16	69	1.02	2,124	0.88
	moderate	350	10.81	3,439	4.68	171	5.06	7,949	4.91	3	2.16	418	8.42	524	7.76	11,806	4.91
	middle	859	26.54	11,078	15.07	608	18.00	25,287	15.61	6	4.32	1,008	20.30	1,473	21.81	37,373	15.54
	upper	1,821	56.26	52,249	71.06	2,285	67.66	110,487	68.22	8</							

1-4 FAMILY HMDA LOAN ORIGINATIONS ¹																	
YEAR 2003																	
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS																	
County/Area	Borrower Income Level	Home Purchase				Refinancing				Home Improvement				Total			
		Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %	Bank #	Bank %	Agg. #	Agg. %
Dutchess	low	14	18.42	152	3.53	5	5.56	535	3.93	1	100.00	59	7.77	20	11.98	746	4.00
MSA 39100	moderate	20	26.32	754	17.51	18	20.00	2,308	16.97	0	0.00	153	20.16	38	22.75	3,215	17.23
	middle	25	32.89	1,292	30.00	30	33.33	3,933	28.92	0	0.00	228	30.04	55	32.93	5,453	29.22
	upper	13	17.11	1,904	44.21	31	34.44	5,595	41.15	0	0.00	282	37.15	44	26.35	7,781	41.69
	zero & NAs	4	5.26	205	4.76	6	6.67	1,227	9.02	0	0.00	37	4.87	10	5.99	1,469	7.87
	1.8 total	76	100.00	4,307	100.00	90	100.00	13,598	100.00	1	100.00	759	100.00	167	100.00	18,664	100.00
Orange	low	13	8.18	203	3.32	6	2.53	443	2.95	0	0.00	41	4.63	19	4.77	687	3.12
MSA 39100	moderate	39	24.53	1,021	16.72	30	12.66	2,043	13.59	0	0.00	121	13.67	69	17.34	3,185	14.46
	middle	44	27.67	1,791	29.32	55	23.21	4,276	28.44	0	0.00	270	30.51	99	24.67	6,337	28.77
	upper	50	31.45	2,832	46.37	118	49.79	7,012	46.63	1	50.00	424	47.91	169	42.46	10,268	46.61
	zero & NAs	13	8.18	261	4.27	28	11.81	1,262	8.39	1	50.00	29	3.28	42	10.55	1,552	7.05
	3.7 total	159	100.00	6,108	100.00	237	100.00	15,036	100.00	2	100.00	885	100.00	398	100.00	22,029	100.00
Ulster*	low	0	0.00	31	1.56	0	0.00	82	1.60	0	0.00	13	3.74	0	0.00	126	1.69
MSA 28740	moderate	3	15.00	190	9.55	5	23.81	478	9.35	0	0.00	44	12.64	8	19.05	712	9.56
	middle	7	35.00	430	21.61	4	19.05	1,129	22.09	0	0.00	86	24.71	11	26.19	1,645	22.08
	upper	9	45.00	1,216	61.11	9	42.86	2,983	58.35	0	0.00	184	52.87	18	42.86	4,383	58.83
	zero & NAs	1	5.00	123	6.18	3	14.29	440	8.61	1	100.00	21	6.03	5	11.90	584	7.84
	0.5 total	20	100.00	1,990	100.00	21	100.00	5,112	100.00	1	100.00	348	100.00	42	100.00	7,450	100.00
Sullivan*	low	0	0.00	12	1.85	0	0.00	30	2.31	0	0.00	7	7.14	0	0.00	49	2.39
Non-MSA	moderate	2	6.90	74	11.44	6	24.00	141	10.84	0	0.00	14	14.29	8	14.81	229	11.19
	middle	9	31.03	177	27.36	9	36.00	286	21.98	0	0.00	28	28.57	18	33.33	491	24.00
	upper	18	62.07	346	53.48	9	36.00	733	56.34	0	0.00	47	47.96	27	50.00	1,126	55.03
	zero & NAs	0	0.00	38	5.87	1	4.00	111	8.53	0	0.00	2	2.04	1	1.85	151	7.38
	0.7 total	29	100.00	647	100.00	25	100.00	1,301	100.00	0	0.00	98	100.00	54	100.00	2,046	100.00
A/A Total	low	137	3.23	2,014	1.56	103	2.05	9,731	2.83	3	1.37	885	6.48	243	2.56	12,630	2.59
100.0 total	moderate	622	14.65	12,286	9.54	470	9.37	43,232	12.56	6	2.74	2,237	16.39	1,098	11.58	57,755	11.87
	middle	1,141	26.88	27,934	21.68	1,036	20.65	79,314	23.04	8	3.65	3,933	28.81	2,185	23.05	111,181	22.84
	upper	2,117	49.87	75,777	58.82	2,880	57.40	178,282	51.79	13	5.94	6,056	44.37	5,010	52.84	260,115	53.44
	zero & NAs	228	5.37	10,821	8.40	528	10.52	33,687	9.79	189	86.30	539	3.95	945	9.97	45,047	9.26
	4,245	100.00	128,832	100.00	5,017	100.00	344,246	100.00	219	100.00	13,650	100.00	9,481	100.00	486,728	100.00	

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); and 2000 Census with 2003 HUD updates (borrower income levels)

1-4 FAMILY HMDA LOAN ORIGINATIONS ¹									
YEAR 2004									
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS									
County/Area	Borrower	Home Purchase		Refinancing		Home Improvement		Total	
% of Total A/A Loans	Income Level	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %
Nassau	low	15	4.69	25	11.31	7	8.86	47	7.58
	moderate	68	21.25	53	23.98	10	12.66	131	21.13
	middle	103	32.19	58	26.24	18	22.78	179	28.87
	upper	96	30.00	70	31.67	21	26.58	187	30.16
	zero & NAs	38	11.88	15	6.79	23	29.11	76	12.26
	8.5 total		320	100.00	221	100.00	79	100.00	620
Suffolk	low	37	9.25	29	11.11	28	15.05	94	11.10
	moderate	143	35.75	66	25.29	35	18.82	244	28.81
	middle	124	31.00	80	30.65	51	27.42	255	30.11
	upper	64	16.00	66	25.29	40	21.51	170	20.07
	zero & NAs	32	8.00	20	7.66	32	17.20	84	9.92
	11.6 total		400	100.00	261	100.00	186	100.00	847
MD 35004	low	52	7.22	54	11.20	35	13.21	141	9.61
	moderate	211	29.31	119	24.69	45	16.98	375	25.56
	middle	227	31.53	138	28.63	69	26.04	434	29.58
	upper	160	22.22	136	28.22	61	23.02	357	24.34
	zero & NAs	70	9.72	35	7.26	55	20.75	160	10.91
	20.2 total		720	100.00	482	100.00	265	100.00	1,467
Bronx	low	7	3.06	4	5.41	0	0.00	11	3.35
	moderate	54	23.58	13	17.57	2	8.00	69	21.04
	middle	84	36.68	23	31.08	0	0.00	107	32.62
	upper	70	30.57	34	45.95	3	12.00	107	32.62
	zero & NAs	14	6.11	0	0.00	20	80.00	34	10.37
	4.5 total		229	100.00	74	100.00	25	100.00	328
Kings	low	5	0.62	5	1.43	1	0.91	11	0.87
	moderate	80	9.88	26	7.43	7	6.36	113	8.90
	middle	186	22.96	97	27.71	17	15.45	300	23.62
	upper	513	63.33	211	60.29	36	32.73	760	59.84
	zero & NAs	26	3.21	11	3.14	49	44.55	86	6.77
	17.5 total		810	100.00	350	100.00	110	100.00	1,270
New York	low	2	0.63	1	1.27	0	0.00	3	0.73
	moderate	41	12.93	3	3.80	1	7.14	45	10.98
	middle	70	22.08	9	11.39	2	14.29	81	19.76
	upper	173	54.57	56	70.89	9	64.29	238	58.05
	zero & NAs	31	9.78	10	12.66	2	14.29	43	10.49
	5.6 total		317	100.00	79	100.00	14	100.00	410
Putnam	low	1	2.86	1	5.56	0	0.00	2	3.13
	moderate	1	2.86	2	11.11	1	9.09	4	6.25
	middle	11	31.43	3	16.67	2	18.18	16	25.00
	upper	20	57.14	10	55.56	7	63.64	37	57.81
	zero & NAs	2	5.71	2	11.11	1	9.09	5	7.81
	0.9 total		35	100.00	18	100.00	11	100.00	64
Queens	low	16	1.48	7	1.58	3	2.44	26	1.58
	moderate	121	11.22	41	9.26	6	4.88	168	10.22
	middle	244	22.63	124	27.99	25	20.33	393	23.91
	upper	631	58.53	260	58.69	36	29.27	927	56.39
	zero & NAs	66	6.12	11	2.48	53	43.09	130	7.91
	22.6 total		1,078	100.00	443	100.00	123	100.00	1,644
Rockland	low	1	0.74	1	1.47	0	0.00	2	0.81
	moderate	27	20.00	6	8.82	1	2.27	34	13.77
	middle	37	27.41	13	19.12	13	29.55	63	25.51
	upper	63	46.67	43	63.24	27	61.36	133	53.85
	zero & NAs	7	5.19	5	7.35	3	6.82	15	6.07
	3.4 total		135	100.00	68	100.00	44	100.00	247
Westchester	low	30	3.74	8	4.02	3	3.09	41	3.73
	moderate	191	23.79	33	16.58	8	8.25	232	21.11
	middle	261	32.50	54	27.14	11	11.34	326	29.66
	upper	276	34.37	86	43.22	50	51.55	412	37.49
	zero & NAs	45	5.60	18	9.05	25	25.77	88	8.01
	15.1 total		803	100.00	199	100.00	97	100.00	1,099
MD 35644*	low	62	1.82	27	2.19	7	1.65	96	1.90
	moderate	515	15.12	124	10.07	26	6.13	665	13.14
	middle	893	26.21	323	26.24	70	16.51	1,286	25.40
	upper	1,746	51.25	700	56.86	168	39.62	2,614	51.64
	zero & NAs	191	5.61	57	4.63	153	36.08	401	7.92
	69.6 total		3,407	100.00	1,231	100.00	424	100.00	5,062

1-4 FAMILY HMDA LOAN ORIGINATIONS ¹									
YEAR 2004									
BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS									
County/Area	Borrower Income Level	Home Purchase		Refinancing		Home Improvement		Total	
		Bank #	Bank %	Bank #	Bank %	Bank #	Bank %	Bank #	Bank %
Dutchess	low	7	8.86	7	13.73	0	0.00	14	8.24
	moderate	26	32.91	16	31.37	5	12.50	47	27.65
	middle	24	30.38	12	23.53	16	40.00	52	30.59
	upper	12	15.19	11	21.57	14	35.00	37	21.76
	zero & NAs	10	12.66	5	9.80	5	12.50	20	11.76
	1.7 total	79	100.00	51	100.00	40	100.00	170	100.00
Orange	low	25	11.68	8	6.90	6	7.50	39	9.51
	moderate	56	26.17	24	20.69	6	7.50	86	20.98
	middle	53	24.77	32	27.59	15	18.75	100	24.39
	upper	62	28.97	44	37.93	36	45.00	142	34.63
	zero & NAs	18	8.41	8	6.90	17	21.25	43	10.49
	4.7 total	214	100.00	116	100.00	80	100.00	410	100.00
MSA 39100	low	32	10.92	15	8.98	6	5.00	53	9.14
	moderate	82	27.99	40	23.95	11	9.17	133	22.93
	middle	77	26.28	44	26.35	31	25.83	152	26.21
	upper	74	25.26	55	32.93	50	41.67	179	30.86
	zero & NAs	28	9.56	13	7.78	22	18.33	63	10.86
	6.5 total	293	100.00	167	100.00	120	100.00	580	100.00
Ulster*	low	1	4.17	1	5.56	0	0.00	2	3.64
	moderate	3	12.50	2	11.11	1	7.69	6	10.91
	middle	7	29.17	5	27.78	5	38.46	17	30.91
	upper	12	50.00	8	44.44	3	23.08	23	41.82
	zero & NAs	1	4.17	2	11.11	4	30.77	7	12.73
	0.5 total	24	100.00	18	100.00	13	100.00	55	100.00
Sullivan*	low	2	2.74	2	8.00	1	9.09	5	4.59
	moderate	6	8.22	4	16.00	2	18.18	12	11.01
	middle	14	19.18	7	28.00	3	27.27	24	22.02
	upper	49	67.12	11	44.00	4	36.36	64	58.72
	zero & NAs	2	2.74	1	4.00	1	9.09	4	3.67
	1.6 total	73	100.00	25	100.00	11	100.00	109	100.00
A/A Total	low	149	3.30	99	5.15	49	5.88	297	4.08
	moderate	817	18.09	289	15.03	85	10.20	1,191	16.38
	middle	1,218	26.96	517	26.89	178	21.37	1,913	26.30
	upper	2,041	45.18	910	47.32	286	34.33	3,237	44.51
	zero & NAs	292	6.46	108	5.62	235	28.21	635	8.73
	100.0 total	4,517	100.00	1,923	100.00	833	100.00	7,273	100.00

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Bank numbers include those of both the bank and BNY Mortgage Co.

Sources of data: Bank (bank loans and assessment area); and 2000 Census with 2004 HUD updates (borrower income levels)

SMALL BUSINESS LENDING																							
YEAR 2003																							
MSA/County/Area	Geography Income Level	Small Business Loans ¹								% of Loans by Loan Size ²						Loans to Small Businesses ³							
		Bank				Aggregate				Bank			Aggregate			Bank		Aggregate					
		#	%	\$000's	%	#	%	\$000's	%	LS1	LS2	LS3	LS1	LS2	LS3	#	SBLs	\$	SBLs	#	SBLs	\$	SBLs
Nassau	low	1	0.2	20	0.1	249	0.5	4,818	0.4														
	moderate	33	5.2	2,166	6.6	2,699	5.7	84,129	6.2														
	middle	469	73.3	24,078	72.9	30,793	65.4	841,819	62.1														
	upper	137	21.4	6,753	20.5	13,335	28.3	425,666	31.4														
	zero & NAs		0.0		0.0	2	0.0	42	0.0														
14.1	total	640	100.0	33,017	100.0	47,078	100.0	1,356,474	100.0	92.3	3.4	4.2	95.6	2.4	2.0	406	63.4	14,297	43.3	18,290	38.9	522,057	38.5
Suffolk	low	6	0.7	985	2.4	253	0.5	12,920	0.8														
	moderate	183	22.6	9,815	24.3	10,562	20.0	312,259	20.5														
	middle	497	61.5	23,816	58.8	32,576	61.5	917,137	60.3														
	upper	122	15.1	5,857	14.5	9,545	18.0	278,796	18.3														
	zero & NAs		0.0		0.0	1	0.0	3	0.0														
17.8	total	808	100.0	40,473	100.0	52,937	100.0	1,521,115	100.0	92.1	3.8	4.1	95.5	2.4	2.2	530	65.6	16,892	41.7	20,581	38.9	608,532	40.0
MD 35004	low	7	0.5	1,005	1.4	502	0.5	17,738	0.6														
	moderate	216	14.9	11,981	16.3	13,261	13.3	396,388	13.8														
	middle	966	66.7	47,894	65.2	63,369	63.4	1,758,956	61.1														
	upper	259	17.9	12,610	17.2	22,880	22.9	704,462	24.5														
	zero & NAs	0	0.0	0	0.0	3	0.0	45	0.0														
31.8	total	1,448	100.0	73,490	100.0	100,015	100.0	2,877,589	100.0	92.2	3.7	4.1	95.5	2.4	2.1	936	64.6	31,189	42.4	38,871	38.9	1,130,589	39.3
Bronx	low	26	30.2	1,580	32.8	3,382	27.2	96,320	32.9														
	moderate	19	22.1	841	17.5	3,515	28.3	74,132	25.3														
	middle	23	26.7	741	15.4	3,067	24.7	66,990	22.9														
	upper	16	18.6	1,598	33.2	2,325	18.7	45,549	15.6														
	zero & NAs	2	2.3	55	1.1	124	1.0	9,846	3.4														
1.9	total	86	100.0	4,815	100.0	12,413	100.0	292,837	100.0	90.7	7.0	2.3	96.9	1.5	1.6	58	67.4	2,832	58.8	4,959	40.0	121,396	41.5
Kings	low	11	8.9	265	3.4	3,516	8.6	85,311	8.8														
	moderate	49	39.8	2,371	30.0	14,843	36.2	408,007	41.9														
	middle	36	29.3	3,243	41.1	13,858	33.8	300,071	30.8														
	upper	25	20.3	1,954	24.8	8,469	20.7	169,873	17.4														
	zero & NAs	2	1.6	60	0.8	264	0.6	10,470	1.1														
2.7	total	123	100.0	7,893	100.0	40,950	100.0	973,732	100.0	95.1	0.0	4.9	96.6	1.8	1.6	81	65.9	3,688	46.7	16,130	39.4	432,000	44.4
New York	low	7	1.1	411	0.7	2,580	3.2	56,380	2.1														
	moderate	11	1.7	770	1.3	5,723	7.2	131,210	4.8														
	middle	44	7.0	1,430	2.3	5,908	7.4	174,146	6.4														
	upper	544	86.5	57,890	94.5	63,677	80.0	2,278,629	83.4														
	zero & NAs	23	3.7	782	1.3	1,719	2.2	91,539	3.4														
13.8	total	629	100.0	61,283	100.0	79,607	100.0	2,731,904	100.0	85.7	4.9	9.4	94.6	3.1	2.3	362	57.6	20,334	33.2	32,393	40.7	990,489	36.3
Putnam	low	0	0.0	0	0.0	0	0.0	0	0.0														
	moderate	0	0.0	0	0.0	0	0.0	0	0.0														
	middle	0	0.0	0	0.0	0	0.0	0	0.0														
	upper	41	100.0	2,188	100.0	3,156	100.0	77,269	100.0														
	zero & NAs	0	0.0	0	0.0	0	0.0	0	0.0														
0.9	total	41	100.0	2,188	100.0	3,156	100.0	77,269	100.0	90.2	4.9	4.9	95.8	2.5	1.7	31	75.6	1,215	55.5	1,147	36.3	35,994	46.6
Queens	low	5	1.4	1,125	5.6	484	1.2	16,862	1.7														
	moderate	76	21.2	5,016	25.1	7,578	18.7	208,976	20.8														
	middle	160	44.7	5,835	29.2	18,437	45.5	456,051	45.5														
	upper	116	32.4	8,006	40.1	13,646	33.7	300,706	30.0														
	zero & NAs	1	0.3	5	0.0	377	0.9	20,501	2.0														
7.9	total	358	100.0	19,987	100.0	40,522	100.0	1,003,096	100.0	94.4	1.7	3.9	96.4	2.1	1.5	230	64.2	9,425	47.2	15,936	39.3	460,734	45.9
Rockland	low	9	2.6	314	1.8	336	3.4	7,196	2.9														
	moderate	0	0.0	0	0.0	31	0.3	1,550	0.6														
	middle	30	8.8	1,770	10.3	1,291	13.2	26,225	10.5														
	upper	303	88.6	15,135	87.9	8,106	83.0	214,359	86.0														
	zero & NAs	0	0.0	0	0.0	0	0.0	0	0.0														
7.5	total	342	100.0	17,219	100.0	9,764	100.0	249,330	100.0	91.8	4.1	4.1	96.0	2.0	2.0	234	68.4	6,973	40.5	3,760	38.5	116,002	46.5
Westchester	low	0	0.0	0	0.0	70	0.2	3,864	0.5														
	moderate	69	6.5	4,694	7.8	1,572	5.0	47,478	5.6														
	middle	218	20.5	11,765	19.6	4,910	15.7	132,853	15.7														
	upper	778	73.1	43,682	72.6	24,815	79.1	663,280	78.2														
	zero & NAs	0	0.0	0	0.0	4	0.0	462	0.1														
23.4	total	1,065	100.0	60,141	100.0	31,371	100.0	847,937	100.0	91.2	4.8	4.0	96.0	2.1	1.9	711	66.8	24,181	40.2	12,269	39.1	329,123	38.8
MD 35644*	low	58	2.2	3,695	2.1	10,368	4.8	265,933	4.3														
	moderate	224	8.5	13,692	7.9	33,262	15.3	871,353															

SMALL BUSINESS LENDING																						
YEAR 2003																						
MSA/County/Area	Geography Income Level	Small Business Loans ¹								% of Loans by Loan Size ²						Loans to Small Businesses ³						
		Bank				Aggregate				Bank			Aggregate			Bank			Aggregate			
		#	%	\$000's	%	#	%	\$000's	%	LS1	LS2	LS3	LS1	LS2	LS3	#	SBLs	\$	SBLs	#	SBLs	\$
Dutchess	low	16	8.6	1,047	9.7	415	5.9	15,598	8.2													
	moderate	24	12.9	1,462	13.6	829	11.7	22,616	11.9													
	middle	117	62.9	6,433	59.9	4,460	63.1	117,284	61.8													
	upper	29	15.6	1,802	16.8	1,364	19.3	34,350	18.1													
	zero & NAs	0	0.0	0	0.0	2	0.0	6	0.0													
4.1 total	186	100.0	10,744	100.0	7,070	100.0	189,854	100.0	91.4	5.9	2.7	95.2	2.4	2.4	145	78.0	5,547	51.6	2,483	35.1	78,575	41.4
Orange	low	16	7.6	501	3.9	538	6.4	9,659	4.9													
	moderate	13	6.2	1,360	10.5	879	10.5	30,759	15.4													
	middle	112	53.3	7,546	58.0	4,565	54.6	103,491	52.0													
	upper	69	32.9	3,603	27.7	2,385	28.5	55,240	27.7													
	zero & NAs	0	0.0	0	0.0	0	0.0	0	0.0													
4.6 total	210	100.0	13,010	100.0	8,367	100.0	199,149	100.0	88.6	4.8	6.7	95.8	2.2	2.0	154	73.3	8,163	62.7	3,006	35.9	86,438	43.4
Ulster*	low	0	0.0	0	0.0	0	0.0	0	0.0													
	moderate	1	2.7	150	13.3	191	3.8	7,295	8.1													
	middle	7	18.9	198	17.6	1,978	39.7	37,429	41.3													
	upper	29	78.4	778	69.1	2,818	56.5	45,803	50.6													
	zero & NAs	0	0.0	0	0.0	0	0.0	0	0.0													
0.8 total	37	100.0	1,126	100.0	4,987	100.0	90,527	100.0	94.6	5.4	0.0	97.0	1.7	1.3	30	81.1	656	58.3	1,703	34.1	38,797	42.9
Sullivan*	low	0	0.0	0	0.0	0	0.0	0	0.0													
	moderate	2	7.7	145	11.5	98	7.5	2,921	10.2													
	middle	15	57.7	851	67.7	975	74.3	21,221	74.3													
	upper	9	34.6	261	20.8	240	18.3	4,426	15.5													
	zero & NAs	0	0.0	0	0.0	0	0.0	0	0.0													
0.6 total	26	100.0	1,257	100.0	1,313	100.0	28,568	100.0	92.3	3.8	3.8	96.4	1.8	1.8	18	69.2	902	71.8	493	37.5	13,577	47.5
NYS A/A TOTAL	low	97	2.1	6,248	2.3	11,823	3.5	308,928	3.2													
	moderate	480	10.5	28,790	10.5	48,520	14.3	1,331,332	13.9													
	middle	1,728	38.0	87,706	32.1	122,818	36.2	3,194,717	33.4													
	upper	2,218	48.7	149,507	54.7	153,881	45.3	4,593,946	48.0													
	zero & NAs	28	0.6	902	0.3	2,493	0.7	132,869	1.4													
100.0 total	4,551	100.0	273,153	100.0	339,535	100.0	9,561,792	100.0	91.1	4.1	4.8	95.7	2.4	2.0	2,990	65.7	115,105	42.1	133,150	39.2	3,833,714	40.1

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Loans included in "loans to small businesses" as defined in call report instructions, generally consisting of business loans with original amounts of \$1 million or less.

² Loan size categories: LS1 means up to \$100 thousand; LS2 means more than \$100 thousand and up to \$250 thousand; and LS3 means more than \$250 thousand.

³ Small business loans to entities with gross annual revenues of \$1 million or less.

Sources of data: Bank (assessment area); FFIEC (aggregate lending); 2000 Census with 2003 tract definition (geography income levels); and Dun & Bradstreet (small business entities).

SMALL BUSINESS LENDING												
YEAR 2004												
MSA/County/Area	Geography Income Level	Small Business Loans ¹				% of Loans by Loan Size ²			Loans to Small Businesses ³			
		Bank				Bank			Bank	% of	Bank	% of
		#	%	\$000's	%	LS1	LS2	LS3	#	SBLs	\$	SBLs
% of Bank Total #												
Nassau	low	0	0.0	0	0.0							
	moderate	33	5.4	1,881	8.9							
	middle	420	69.0	13,382	63.2							
	upper	156	25.6	5,896	27.9							
	zero & NAs	0	0.0	0	0.0							
14.3 total	609	100.0	21,159	100.0	95.4	2.6	2.0	397	65.2	9,245	43.7	
Suffolk	low	1	0.1	5	0.0							
	moderate	177	23.8	4,332	18.2							
	middle	441	59.3	15,083	63.5							
	upper	125	16.8	4,349	18.3							
	zero & NAs	0	0.0	0	0.0							
17.5 total	744	100.0	23,769	100.0	95.7	2.2	2.2	499	67.1	13,061	54.9	
MD 35004	low	1	0.1	5	0.0							
moderate	210	15.5	6,213	13.8								
middle	861	63.6	28,465	63.4								
upper	281	20.8	10,245	22.8								
zero & NAs	0	0.0	0	0.0								
31.9 total	1,353	100.0	44,928	100.0	95.6	2.4	2.1	896	66.2	22,306	49.6	
Bronx	low	24	34.3	742	19.0							
	moderate	15	21.4	867	22.2							
	middle	16	22.9	324	8.3							
	upper	10	14.3	1,241	31.7							
	zero & NAs	5	7.1	735	18.8							
1.6 total	70	100.0	3,909	100.0	94.3	1.4	4.3	43	61.4	1,252	32.0	
Kings	low	12	15.2	430	12.1							
	moderate	32	40.5	1,575	44.2							
	middle	22	27.8	1,359	38.1							
	upper	13	16.5	199	5.6							
	zero & NAs	0	0.0	0	0.0							
1.9 total	79	100.0	3,563	100.0	96.2	1.3	2.5	54	68.4	1,520	42.7	
New York	low	6	1.1	226	0.6							
	moderate	17	3.0	396	1.0							
	middle	48	8.5	9,406	23.5							
	upper	483	85.3	29,196	72.9							
	zero & NAs	12	2.1	847	2.1							
13.3 total	566	100.0	40,071	100.0	90.3	2.7	7.1	325	57.4	11,488	28.7	
Putnam	low	0	0.0	0	0.0							
	moderate	0	0.0	0	0.0							
	middle	0	0.0	0	0.0							
	upper	42	100.0	1,235	100.0							
	zero & NAs	0	0.0	0	0.0							
1.0 total	42	100.0	1,235	100.0	95.2	4.8	0.0	31	73.8	702	56.8	
Queens	low	4	1.2	275	1.7							
	moderate	72	22.0	5,709	34.6							
	middle	145	44.3	4,473	27.1							
	upper	100	30.6	5,332	32.4							
	zero & NAs	6	1.8	689	4.2							
7.7 total	327	100.0	16,477	100.0	93.9	1.2	4.9	204	62.4	9,346	56.7	
Rockland	low	6	1.7	93	0.6							
	moderate	6	1.7	175	1.1							
	middle	26	7.2	1,293	8.2							
	upper	325	89.5	14,155	90.1							
	zero & NAs	0	0.0	0	0.0							
8.5 total	363	100.0	15,716	100.0	91.7	4.1	4.1	228	62.8	5,656	36.0	
Westchester	low	5	0.5	133	0.3							
	moderate	95	9.4	3,318	8.2							
	middle	176	17.3	9,857	24.3							
	upper	740	72.8	27,308	67.2							
	zero & NAs	0	0.0	0	0.0							
23.9 total	1,016	100.0	40,616	100.0	93.3	3.4	3.2	671	66.0	17,505	43.1	
MD 35644*	low	57	2.3	1,899	1.6							
	moderate	237	9.6	12,040	9.9							
	middle	433	17.6	26,712	22.0							
	upper	1,713	69.5	78,666	64.7							
	zero & NAs	23	0.9	2,270	1.9							
58.0 total	2,463	100.0	121,587	100.0	92.6	3.0	4.4	1,556	63.2	47,469	39.0	

SMALL BUSINESS LENDING												
YEAR 2004												
MSA/County/Area	Geography Income Level	Small Business Loans ¹				% of Loans by Loan Size ²			Loans to Small Businesses ³			
		Bank				Bank			Bank	% of	Bank	% of
		#	%	\$000's	%	LS1	LS2	LS3	#	SBLs	\$	SBLs
% of Bank Total #												
Dutchess	low	11	7.1	753	13.1							
	moderate	10	6.4	132	2.3							
	middle	108	69.2	3,784	65.6							
	upper	27	17.3	1,095	19.0							
	zero & NAs	0	0.0	0	0.0							
3.7 total		156	100.0	5,764	100.0	93.6	3.8	2.6	107	68.6	2,602	45.1
Orange	low	11	5.2	610	7.7							
	moderate	25	11.9	765	9.7							
	middle	122	58.1	4,710	59.8							
	upper	52	24.8	1,789	22.7							
	zero & NAs	0	0.0	0	0.0							
4.9 total		210	100.0	7,874	100.0	92.9	3.3	3.8	154	73.3	4,220	53.6
MSA 39100	low	22	6.0	1,363	10.0							
	moderate	35	9.6	897	6.6							
	middle	230	62.8	8,494	62.3							
	upper	79	21.6	2,884	21.1							
	zero & NAs	0	0.0	0	0.0							
8.6 total		366	100.0	13,638	100.0	93.2	3.6	3.3	261	71.3	6,822	50.0
Ulster*	low	0	0.0	0	0.0							
	moderate	2	4.3	156	5.9							
	middle	39	83.0	2,353	88.7							
	upper	6	12.8	143	5.4							
	zero & NAs	0	0.0	0	0.0							
1.1 total		47	100.0	2,652	100.0	89.4	6.4	4.3	35	74.5	1,723	65.0
Sullivan*	low	0	0.0	0	0.0							
	moderate	1	5.9	500	44.1							
	middle	12	70.6	572	50.4							
	upper	4	23.5	62	5.5							
	zero & NAs	0	0.0	0	0.0							
0.4 total		17	100.0	1,134	100.0	82.4	11.8	5.9	14	82.4	479	42.2
NYS A/A TOTAL	low	80	1.9	3,267	1.8							
	moderate	485	11.4	19,806	10.8							
	middle	1,575	37.1	66,596	36.2							
	upper	2,083	49.1	92,000	50.0							
	zero & NAs	23	0.5	2,270	1.2							
100 total		4,246	100.0	183,939	100.0	93.5	2.9	3.6	2,762	65.0	78,799	42.8

* The bank takes only that part of the county, MD or MSA in its assessment area.

¹ Loans included in "loans to small businesses" as defined in call report instructions, generally consisting of business loans with original amounts of \$1 million or less

² Loan size categories: LS1 means up to \$100 thousand; LS2 means more than \$100 thousand and up to \$250 thousand; and LS3 means more than \$250 thousand.

³ Small business loans to entities with gross annual revenues of \$1 million or less

Sources of data: Bank (assessment area); 2000 Census with 2004 tract definition (geography income levels); and Dun & Bradstreet (small business entities)

GLOSSARY

Aggregate

The cumulative lending by all HMDA-reporting lenders in the same geographic area under evaluation.

Community Development

The term “community development” is defined to mean:

1. Affordable housing (including multifamily housing) for low- or moderate-income (“LMI”) individuals;
2. Community services targeted to LMI individuals;
3. Activities that promote economic development by financing business or farms that meet the size eligibility standards of the United States Small Business Administration (“SBA”) Development Company or Small Business Investment Company programs, or have gross annual incomes of \$1 million or less;
4. Activities that revitalize or stabilize LMI geographies; and
5. Activities that seek to prevent defaults and/or foreclosures in loans included in (1) and (3), above.

A “community development loan” is defined as a loan that has as its *primary purpose* community development. This includes but is not limited to loans to:

- Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing for multifamily rental property serving low or moderate income (“LMI”) persons;
- Nonprofit organizations serving primarily LMI or other community development needs;
- Borrowers to construct or rehabilitate community facilities that are located in LMI areas or that primarily serve LMI individuals;
- Financial intermediaries including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds or pools, micro-finance institutions, and low-income or community development credit unions that primarily lend or facilitate lending to promote community development;
- Local, state and tribal governments for community development activities; and
- Borrowers to finance environmental clean-up or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located.

A “qualified investment” is defined as a lawful investment, deposit, membership share or grant that has as its *primary purpose* community development. This includes but is not limited to investments, deposits, membership shares or grants in or to:

- Financial intermediaries (including community development financial institutions,

community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;

- Organizations engaged in affordable housing rehabilitation and construction;
- Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;
- Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women's centers, and alcohol and drug recovery centers;
- Projects eligible for low-income housing tax credits;
- State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
- Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
- Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.

A "community development service" is defined as a service that has as its *primary purpose* community development, is related to the provision of financial services, and has not been considered in the evaluation of the banking institution's retail banking services. This includes but is not limited to:

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs;
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing;
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM "Training Machines" available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
 - ❖ Serving on a loan review committee;
 - ❖ Developing loan application and underwriting standards;
 - ❖ Developing loan processing systems;
 - ❖ Developing secondary market vehicles or programs;

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- ❖ Assisting in marketing financial services, including the development of advertising and promotions, publications, workshops and conferences;
 - ❖ Furnishing financial services training for staff and management;
 - ❖ Contributing accounting/bookkeeping services; and
 - ❖ Assisting in fund raising, including soliciting or arranging investments.

Demand-Adjusted Penetration Rate

The number of owner-occupied loans made by the institution (or aggregate as appropriate) in a geographic area per thousand owner-occupied housing units in that area. Mathematically, it is arrived at by dividing the number of owner-occupied housing units into the number of loans made and then multiplying by 1,000.

Demand-Adjusted Penetration Ratio

A ratio that depicts geographic penetration of loans by comparing demand-adjusted lending in LMI areas with non-LMI areas. Mathematically, it is arrived at by dividing the demand-adjusted penetration rate in non-LMI areas into the demand-adjusted penetration rate in LMI areas and then expressed as a percentage.

A ratio of 100% means that the institution (or aggregate as appropriate) made an equal number of loans proportionally in LMI and non-LMI areas. Less than 100 percent would indicate less lending in LMI areas on the same basis compared to non-LMI areas, whereas over 100 percent would indicate a greater level of lending in LMI areas versus non-LMI areas.

Home Mortgage Disclosure Act (“HMDA”)

The Home Mortgage Disclosure Act, enacted by Congress in 1975, and subsequently amended, requires institutions to annually report data about applications for residential (including multifamily) financing.

Loans to Small Businesses

Small business loans to businesses with gross annual revenues of \$1 million or less.

Low or Moderate Income (“LMI”) Geographies

Those census tracts or block numbering areas (“BNAs”), where according to the 2000 US Census, the median family income is less than 80% of the area median family income. In the case of tracted areas that are part of a Metropolitan Statistical Area (“MSA”) or Primary Metropolitan Statistical Area (“PMSA”), this would relate to the median family income for the MSA or PMSA in which the tracts are located. In the case of BNAs and tracted areas that are not part of a MSA or PMSA, the area median family income would be the statewide nonmetropolitan median family income.

LMI Borrowers

Borrowers whose income, as reported on the loan application which the lender relied upon in making the credit decision, is less than 80% of the area median family income. In the case where the residential property is located in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide nonmetropolitan median family income. In all instances, the area median family incomes used to measure borrower income levels are updated annually by the U.S. Department of Housing and Urban Development (“HUD”).

LMI Individuals/Persons

Those individuals, whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide nonmetropolitan median family income. In all instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

Small Business Loans

Loans to businesses with original amounts of \$1 million or less.