



PUBLIC DISCLOSURE

January 6, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank Alaska
Charter Number: 12072

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Anchorage, AK 99503

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall Community Reinvestment Act (CRA) Rating

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of **First National Bank Alaska (FNBA)** with respect to the lending, investment, and service tests:

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

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- An excellent distribution of Home Mortgage Disclosure Act (HMDA) lending by geography and an adequate distribution by borrower income in the Anchorage Assessment Area.
- An excellent distribution of small loans to businesses by geography and an adequate distribution of small loans to businesses by borrower income.
- An excellent level of community development lending responsive to the needs of the bank's assessment areas (AAs).
- An excellent level of community development investments.
- FNBA's branches are readily accessible to geographies and individuals of all income levels. Their range of services, products, and business hours do not vary in ways that inconvenience their customers, including low- and moderate-income (LMI) individuals.
- An excellent level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 C.F.R. § 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act: the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing, and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by the Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less, and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less, and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

FNBA is the largest independently owned bank in Alaska. The bank has no holding company. It is an intrastate bank that has no affiliates. The bank is headquartered in Anchorage, with a significant amount of its business activities and facilities concentrated in the Anchorage Mat-Su MSA.

The bank was founded in 1922 and operates as a full service bank, providing a variety of financial services within its ten assessment areas. The AAs are spread throughout Alaska and include a substantial portion of the Anchorage MSA, comprised of the Municipality of Anchorage and the Matanuska-Susitna (Mat-Su) Borough, as well as nine other full or partial boroughs. The additional boroughs are Bethel, Denali, Fairbanks North Star, Haines, Juneau, Kenai Peninsula, Kodiak Island, Sitka, and Valdez-Cordova. FNBA operates 30 branches and 32 ATMs in the AAs.

Services offered by the bank include a variety of deposit account products, loan products, safe deposit boxes, night depositories, drive-up facilities, remote deposit capture and an internet site. The bank also offers trust and private banking services. FNBA continues to enhance its products and services to help meet the diverse needs of the communities it serves. There was no merger or acquisition that affected the scope of the bank's operations during the evaluation period. For a more detailed description of products and services, please refer to the Service Test part of this Performance Evaluation (PE).

As of September 30, 2013, FNBA reported total assets of \$3.1 billion. Total loans were \$1.3 billion, total deposits were \$2.1 billion, and net Tier One Capital was \$452 million. It is important to note that FNBA's capital is above the average for peer banks, and its earnings are comparable to peer group averages. These financial indicators show a good capacity for CRA performance. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs.

The primary focus of FNBA is to become the number one small business bank in Alaska. This focus on commercial lending is reflected in the breakdown of FNBA's loan portfolio. About 48% of gross loans are secured by commercial real estate; 17% are commercial and industrial loans; 12% are construction and development loans; 8% are secured by 1-4 family residential real estate; 7% are credit card, home equity, or individual loans; 4% are secured by multifamily real estate; 3% are municipal loans; and 1% are agricultural loans.

FNBA, along with other banking institutions operating in Alaska, faces a major obstacle in serving its customers. This obstacle is the state's geography. The unique geographic characteristics of Alaska contributes to high transportation and communication expenses, particularly for more remote rural areas. Adding to this challenge is the lack of infrastructure, fragmented population, and weak economic conditions that rural Alaska faces. This situation presents FNBA with difficult challenges in its efforts to provide all of its customers with ready access to banking services as it would be impractical to establish branches in most of the remote towns and villages scattered throughout the state.

FNBA was last examined under the CRA using performance information through January 18, 2011, and was rated "**Outstanding.**"

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation assesses the bank's performance from January 1, 2010, through December 31, 2013. We evaluated HMDA and CRA reportable lending activity from January 1, 2010, through December 31, 2012. We considered all Community Development (CD) Loans, Investment Test, and Service Test information from January 1, 2011 through December 31, 2013.

Home purchase, home refinance, small business, and CD loans were reviewed in conjunction with the Lending Test. Additionally, any special loan programs offered by the bank were included in our analysis to the extent appropriate. Lending activity in 2012 was evaluated against the 2012 HMDA Aggregate Peer Mortgage Data, 2012 Peer Small Business Data, and 2010 U.S. Census Bureau (Census) data. Lending activity in 2010 and 2011 was evaluated primarily against 2011 HMDA Aggregate Peer Mortgage Data, 2011 Peer Small Business Data, and 2000 Census data. Although the distribution of all years of data were considered, the PE Tables and narrative focus on lending activity in 2012. Generally, lending performance in 2010 and 2011 was comparable to the 2012 performance unless otherwise noted. The bank originated insufficient volumes of small farm loans in its AAs to support distribution analysis.

The Investment Test focuses on a review of qualifying investments, grants, and donations. Community development services, retail banking locations, and retail banking services were reviewed in connection with the Service Test. The bank did not submit optional consumer loan information for consideration, so optional Table 13 is not included in Appendix D. For more information about the scope of this evaluation, please refer to Appendix A.

Data Integrity

We reviewed the bank's system of internal controls to ensure the integrity of its loan reporting process. The review found that FNBA's internal controls, which include extensive loan data testing procedures, are satisfactory. The bank's publicly reported HMDA and CRA loan data is accurate. We verified the accuracy of FNBA's investment, service, and community development data during this CRA examination.

Selection of Areas for Full Scope Review

FNBA operates primarily in ten AAs in Alaska. One AA, the Anchorage AA, is comprised of parts of the Anchorage MSA, which consists of the Municipality of Anchorage and the Matanuska-Susitna Borough. (Note: In 2012, this AA contained the entirety of the Anchorage and Matanuska-Susitna Boroughs.) Another AA consists of parts of the Fairbanks MSA (Fairbanks AA). The other eight AAs are noncontiguous full or partial boroughs in rural Alaska. We selected the Anchorage AA for a full scope review, and selected the Fairbanks AA and the eight non-MSA areas for limited scope reviews. The Anchorage AA is the most important assessment area to the bank's operations. The majority of FNBA's loans and deposits are derived from the Anchorage AA. FNBA's CRA performance in the Anchorage AA is

substantially representative of its overall performance. To obtain a better understanding of the scope of FNBA's AAs, please refer to the Market Profiles for the State of Alaska in Appendix C for detailed demographics and other performance context information for the Anchorage AA.

In conjunction with this CRA examination, we conducted one community contact interview with a representative from a business development association. The organization provides volunteer income tax assistance (VITA) and financial literacy services for the Native Alaskan Communities in the rural areas of the state. The contact stated that Alaska's financial institutions provide limited support for the efforts despite the benefits of the program for very low-income Native Alaskans.

Ratings

The bank's overall rating is based primarily on the full scope review. In general, the performance in each AA is weighted according to the percentage of loans and deposits in that area. Therefore, FNBA's performance in the Anchorage AA carries the most weight in developing the overall conclusions for the bank.

Fair Lending or Other Illegal Credit Practices Review

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

LENDING TEST

Conclusions for Area Receiving Full Scope Review

FNBA's performance under the lending test is rated Outstanding. Based on the full scope review, the bank's performance in the Anchorage AA is excellent.

Lending Activity

Overall, FNBA's lending activity in HMDA and CRA reportable loans is considered good. FNBA reported a 21.40% market share of deposits in June 2013. FNBA's share of home purchase loans is 2.66% by number and 2.57% by dollar amount of lending in the Anchorage AA, both of which are significantly below its deposit market share. FNBA's share of home improvement loans is 13.86% by number and 27.36% by dollar amount of lending in the AA. The percentage by number is significantly below its deposit market share, while the percentage by dollar volume significantly exceeds its deposit market share. FNBA's share of refinance loans is 3.94% by number and 3.47% by dollar amount of lending in the AA, both of which are significantly below its deposit market share. FNBA's low percentages, relative to its deposit market share reflect the fact that there are 69 home purchase lenders, 33 home improvement lenders, and 130 refinance lenders competing in the market, and only four other depository financial institutions. FNBA ranked fifth in the home purchase lending market and only two other depository financial institutions have a greater market share. The bank ranked fourth in the home improvement market, and only one other depository financial institution has a greater market share. FNBA ranked fifth in the refinance market, and only one other depository financial institution has a greater market share.

FNBA's market share of small business loans is 4.28% by number and 23.66% by total dollars ranking it fifth in the market. Most of the reporting institutions with larger market shares, by number of loans are issuers of business credit cards. The percentage by number would indicate poor performance and the percentage by dollar would indicate excellent performance when compared to the bank's deposit market share of 21.40%. We consider the overall performance good because FNBA is the fifth highest ranking small business lender in the Anchorage AA and there are 37 other small business lenders in the market.

Considering the large numbers of lenders operating in the market without a branch or deposit-taking presence, FNBA's ranking in lending among depository financial institutions is consistently equal to its ranking in deposit share. In addition to its level of HMDA and small business loans, we considered the exceptionally high volume of CD loans, totaling more than \$51.5 million, originated in the Anchorage AA. The combined level of lending activity had a positive effect upon our overall conclusion about the bank's performance under the Lending Test.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home Purchase

Home purchase lending in the Anchorage AA is good. Home purchase lending volumes in low-income CTs were too low in the bank and among all lenders for analysis of market shares and lending versus demographics.

The percentage of FNBA's loans in moderate-income CTs is near to the demographics for those tracts and significantly exceeds its overall market share. For the 2010 and 2011 activity period, the bank home purchase loans exceed the percent of owner-occupied loan in both low- and moderate-income geographies in the Anchorage AA.

Home Improvement

Home improvement lending in the Anchorage AA is good. Home improvement lending volumes in low-income CTs were too low in the bank and among all lenders for analysis of market shares and lending versus demographics.

The percentage of FNBA's loans in moderate-income CTs exceeds the demographics. FNBA's market share in these CTs substantially meets its overall market share.

Refinance

Home mortgage refinance lending in the Anchorage AA is adequate. Home mortgage refinance lending volumes in low-income CTs is too low in the bank and among all lenders for analysis of market shares and lending versus demographics.

The percentage of FNBA's loans in moderate-income CTs is somewhat lower than the demographics. The market share in those tracts substantially meets its overall market share.

Multifamily

Multifamily mortgage lending in the Anchorage AA is excellent. Multifamily lending volumes in low-income CTs were too low in the bank and among all lenders for analysis of market shares and lending versus demographics.

The percentage of FNBA's multifamily loans in moderate-income CTs significantly exceeds the demographics of those tracts and its overall market share.

Small Loans to Businesses

Refer to Table 6 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to businesses.

The geographic distribution of small loans to business in the Anchorage AA is excellent. The bank's small loans to businesses significantly exceeds the area demographics in the low-income CTs and exceeds the area demographics in moderate-income CTs. The bank's market share in low- and moderate-income CTs significantly exceeds its overall market share.

Small Loans to Farms

Refer to Table 7 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

The bank is not a significant lender of small loans to farms.

Lending Gap Analysis

Maps and reports detailing FNBA's lending activity over the evaluation period for small loans to businesses, home purchase loans, and home refinance loans were reviewed to identify gaps in the geographic distribution. No unexplained conspicuous gaps were identified. Two moderate-income geographies were not penetrated by small business, small farm, and HMDA loans. Both of those geographies are comprised primarily of military bases with virtually no owner-occupied housing, small businesses, or farms, and therefore there is little demand for such loans. The absence of unexplained gaps in the bank's lending had a positive effect on our conclusion about the geographic distribution of FNBA's lending activity.

Inside/Outside Ratio

Virtually all of the applicable loans originated or purchased by FNBA during the evaluation period were within its AAs. The bank's excellent performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography. Ninety-nine percent of the HMDA loans (home purchase, home improvement, refinance, and multifamily), 96% of the small loans to businesses and farms, and 100% of CD loans were made to borrowers within FNBA's AAs, or within the State of Alaska.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase

FNBA's distribution of home purchase loans to borrowers of different income levels in the Anchorage AA is adequate. The bank's loans to low-income borrowers is significantly lower than the demographics for those borrowers. Loans to moderate-income borrowers significantly exceed the demographics for those borrowers. FNBA's market share of loans to low-income borrowers significantly exceeds the bank's overall market share and market share of loans to moderate-income borrowers is below the bank's overall market share.

Home Improvement

Home improvement lending to borrowers of different income levels in the Anchorage AA is adequate.

For lending activity for 2012, the bank's loans to low-income borrowers is significantly lower than the demographics for those borrowers. Loans to moderate-income borrowers is somewhat lower than the demographics for those borrowers. FNBA's market share of loans to low- and moderate- income borrowers is significantly below the bank's overall market share.

For lending activity in 2010 and 2011, the bank's loans to low-income borrowers is significantly lower than the demographics for those borrowers. Loans to moderate-income borrowers exceeds the demographics for those borrowers. FNBA's market share of loans to low-income borrowers is significantly below the bank's overall market share. FNBA's market share of loans to moderate-income borrowers significantly exceeds the bank's overall market share.

Home Mortgage Refinance Loans

FNBA's distribution of home mortgage refinance loans to borrowers of different income levels in the Anchorage AA is good. The bank's percentage of loans to low-income borrowers is significantly lower than the demographics. The bank's percentage of loans to moderate-income borrowers exceeds the demographics.

The bank's market share of loans to low-income borrowers significantly exceeds its overall market share. FNBA's market share of loans to moderate-income borrowers exceeds its overall market.

Small Loans to Businesses

Refer to Table 11 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

FNBA's distribution of small loans to businesses by the income of the borrower in the Anchorage AA is adequate. The bank's percentage of loans to businesses with revenues of less than \$1 million is lower than the percentage of those businesses in the AA.

The bank's market share of loans to businesses with revenues of less than \$1 million significantly exceeds its overall market share.

Small Loans to Farms

Refer to Table 12 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

The bank is not a significant lender of small loans to farms.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate FNBA's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. Table 5 contains geographic lending data on all multifamily loans, including those that qualify as CD loans. However, Table 5 does not separately list CD loans.

FNBA made an excellent amount of CD loans during the evaluation period. The bank's total community development lending activity, resulting in 79 loans totaling more than \$223.6 million, provided funds for economic development, community service projects, revitalization of low-and moderate-income geographies, support for Native Alaskan tribes, and housing for LMI individuals. Thirty-four of the loans, totaling more than \$51.5 million, were originated in the Anchorage MSA. Another 19 loans, totaling \$56.5 million, were originated outside of the Anchorage MSA within the bank's other AAs. The remaining 26 loans, totaling \$115.6 million, benefited a broader regional or statewide area that included the bank's AAs. CD lending levels indicate a significant commitment of funds by FNBA to meet community needs, particularly in light of the bank's high capital levels. It should be noted that FNBA's capital levels are almost twice the average level of its peers.

FNBA has identified AAs that are reasonable, based on the physical locations of its branch delivery system. Alaska has vast sparsely populated geographical areas that, although not part of the FNBA's delineated AAs, are served by the bank. Loans in these areas are not included in the tables in the Appendix, but receive the same weight as CD loans within the AAs. Many of the loans are considered complex based on financing structure and collateral. The loans are also flexible and responsive to community needs. Examples of loans displaying responsiveness and flexibility include:

- Project funding for an emergency shelter for LMI women and children.
- Refinance and rehabilitation of a Native corporation-owned hotel in Anchorage with a Bureau of Indian Affairs (BIA) guarantee.
- Two lines of credit and a loan to a medical services provider providing support throughout rural Alaska. One of the lines provided construction funds for a seasonal housing facility, and then was converted to the loan. The second line of credit provided bridge funding for operations pending the receipt of federal reimbursements.
- A loan to a rural Native Alaskan village to provide operating funds until the collection of local taxes and the receipt of pending funding from the state.
- A loan and a line of credit to a rural nonprofit commercial fishing association to support operations.
- A loan to a Native Alaskan housing authority to provide bridge funds for operations pending the receipt of a Native American Housing Assistance and Self Determination Act (NAHASDA) grant.

In addition to the loans mentioned and other community development loans reported, FNBA provided several community development-related loans that were reported in the small business lending numbers. The loans provided affordable housing, supported community services, economic development and the revitalization of low-and moderate-income geographies.

PRODUCT INNOVATION AND FLEXIBILITY

FNBA has developed a national reputation as a bank that finances housing in remote rural communities benefiting LMI individuals. The bank uses numerous flexible lending programs offered by the state and the federal government to enable it to address the credit needs of its communities in a safe and sound manner. The programs enhance the bank's lending performance and are invaluable in enabling it to impact rural communities.

A number of the reported community development loans met essential community needs. Most of the loans were outside of the bank's assessment area. However, they still merit mention for their value to impoverished communities in the broader statewide or regional area that includes FNBA's AAs. Some of the loans are considered under the Investment Test as part of the bank's Rural Tax Exemption Program. Under this program, loans are originated at below market rates, and considered as investments based on IRS guidelines. Most of the loans provide affordable housing for residents, including public safety officers and teachers in remote villages inaccessible except by air or water transport. FNBA received a national award in recognition for its work in rural Alaska in reaching the underserved.

During the evaluation period, FNBA demonstrated flexibility by using affordable housing programs including: the Alaska Housing Finance Corporation's (AHFC) Housing Choice Voucher Program, Tax-Exempt First Time Homebuyer Program, Rural Program and Interest Rate Reduction for Low-Income Borrowers (IRRLIB); the Affordable Housing Enhanced Loan Program (AHELP); the Cook Inlet Housing Authority 2nd Deed of Trust Program; the USDA Rural Development 1st Deed of Trust Program; the HUD ONAP 184 Loan Program; the Alaska Community Development Home Opportunity Program (HOP); and the Muckleshoot Housing Authority Program. The bank made 479 loans, totaling over \$65 million, to LMI families during the evaluation period using affordable housing programs.

FNBA also participates in several business lending programs that support small businesses. From January 1, 2011 through December 30, 2013, FNBA made 78 loans, totaling nearly \$134 million, using various Small Business Administration (SBA), Bureau of Indian Affairs (BIA), Alaska Industrial Development and Export Authority (AIDEA), and HUD Title VI loan programs linked to the NAHASDA.

CONCLUSIONS FOR AREAS RECEIVING LIMITED SCOPE REVIEWS

Based on limited scope reviews, the bank's performance under the lending test in the Fairbanks MSA and the Bethel, Denali, Haines-Klukwan, Juneau, Kenai, Kodiak, Sitka, and Valdez-Cordova non-metropolitan AAs is not inconsistent with the bank's overall outstanding rating. Refer to Tables 1 through 11 in Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for AREA Receiving Full Scope Review

FNBA's performance under the Investment Test is rated Outstanding. Based on the full-scope review, the bank's performance in the Anchorage AA is excellent with more than \$4 million in one investment and numerous donations during the evaluation period. Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. The table includes donation data. FNBA's total current period investments and donations in its assessment areas, as well as the broader regional area of the state of Alaska, total \$28.9 million representing 6.5% of the bank's Tier One capital as of year-end 2013.

During the evaluation period, in addition to the current period investments, the bank had \$13.5 million in prior period investments in its AAs. Another \$8.3 million in prior period investments remained in other areas of the state, resulting in total prior period investments of \$21.7 million. Overall, the bank's combined current and prior period investments and donations for the state of Alaska totaled \$50.6 million or 11.4% of Tier One capital.

FNBA has a significant level of qualified community development-related investments and donations that are responsive to the state's credit and community economic development needs. The bank has made exceptional impact in rural areas through innovative and complex initiatives such as its Rural Tax Exempt Loan Program (RTEP) that results in below market loans that are classified as investments under Internal Revenue Service guidelines. Several of the RTEP investments have supported essential services in Native Alaskan villages, and provided affordable housing and economic development assistance in areas only accessible by air or water transport.

Another innovative and responsive investment is the bank's donation to an organization providing VITA for Native Alaskan villages in remote areas of the state. In addition to the tax preparation assistance provided by volunteers, many of whom are graduate students, the organization provides financial literacy classes and materials to the residents.

The bank also provided support for several organizations that provide services for the homeless including shelters, transitional housing, and the complex HUD Title VI housing developments. The investment and donation support is essential as Alaska has a low percentage of owner-occupied housing.

Conclusions for Area Receiving Limited Scope Reviews

Based on limited scope reviews, FNBA's performance under the investment test in the Fairbanks MSA and the Bethel, Denali, Haines-Klukwan, Juneau, Kenai, Kodiak, Sitka, and Valdez-Cordova non-metropolitan AAs is not inconsistent with the bank's overall Outstanding rating. Refer to Table 14 of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full Scope Reviews

FNBA's performance under the Service Test is rated Outstanding. Based on a full scope review, the bank's performance in the Anchorage AA is excellent.

Retail Banking Services

Refer to Table 15 in Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNBA's branches are readily accessible to geographies and individuals throughout the Anchorage AA. FNBA's distribution of branches in low- and moderate-income CTs exceeds the percentage of the population living in both low- and moderate-income tracts, thus providing convenient accessibility to most residents in those tracts. No branches were opened or closed in the Anchorage AA during the evaluation period. Lobby hours are reasonable, and there are no significant differences in hours or services for branches in low- and moderate-income geographies compared to those in middle- and upper-income geographies. The bank's business hours are structured to accommodate customers' needs. Six of the twelve Anchorage branches have Saturday hours (a total of 14 FNBA branches throughout the state offer Saturday hours), and rural branches accommodate clients by appointment, traveling to hub areas to provide services as needed.

FNBA provides bilingual services at several offices and via phone. These languages include Samoan, Russian, Spanish, Yu'pik and Tagalog.

Alternative Delivery Systems

Providing banking services throughout the state of Alaska offers unique challenges for banks in the state. Populations are spread out over vast areas that encompass many towns and villages. FNBA has made strides to serve these areas by providing BusinessLink, Direct Deposit services, online banking, remote deposit capture, and an ATM network.

There are 32 ATMs in the bank's assessment areas. All of the bank's branch offices, aside from one in Juneau and another in Bethel, have an ATM at the location. FNBA serves a large group of clients all over the state of Alaska. The bank's assessment areas reflect branch locations but cannot represent the dispersed population of the large state. Small pockets of individuals reside in villages and tiny communities scattered throughout the state.

The implementation of remote deposit capture supplement the loss of the postage paid bank by mail program. Known as deposit advantage, remote deposit advantage is a new way to do business. With a portable scanner and internet connection, the banks rural customers can submit their deposits from their business location, instead of making a personal trip to the bank or night drop.

The bank continues to offer the First Account as well as electronic transfer accounts developed with input from the U.S. Treasury for use in rural Alaska. FNBA offers the First Account, an account for individuals that need checking services, but are comfortable with limited transactions at reduced or no cost. Also supplementing the branch system is the bank's on line service. The bank offers online mortgage applications and a comprehensive online home loan center as well as other specialized micro sites specific to particular industry.

During the current evaluation period, FNBA launched FNBAApp, the bank's mobile banking application that gives customers the ability to manage their money anytime, anywhere - from their mobile device(s). The application is a way to access the bank's online banking application (BankNow! Online) to view balances, check account activity, pay bills, and make transfers between accounts. As of December 2012, there were 38 mobile banking customers. By the end of November 2013, this figure had grown to over 3,600.

The incomes of customers using these alternative delivery systems are not tracked; therefore we could not place significant weight on the alternative delivery systems when drawing conclusions about the Service Test.

Community Development Services

FNBA offers a high level of community development services that are specific to a variety of people and organizations throughout the state. The bank has focused its CD services on supporting the capacity and infrastructure necessary for the growth of the economy and affordable housing in Alaska. During the evaluation period, the bank provided 4,455 hours of services to various organizations throughout the state. The bank supports the volunteer efforts of its employees. Individuals from headquarters and the branches serve on boards and in volunteer functions throughout the bank's AAs.

In the Anchorage AA, FNBA employees provided 1,216 hours of community development-related service. Some of the organizations benefiting from FNBA employees' volunteer efforts include:

- A nonprofit organization that provides housing for LMI disabled individuals. The FNBA employee served as a board member.
- A nonprofit organization that provides health services to low-income individuals. The FNBA employee served as a board member.
- An organization that provides training, technical assistance and micro-loans for low-income women. The FNBA employee served as a board member.

FNBA also contributes many service hours to various organizations that benefit other parts of Alaska. Service hours to these areas totaled 3,239 hours. Examples of the services provided to these areas include:

- Technical assistance for a tribal housing authority that serves low income tribal members. Bank staff provided fund raising and grant writing assistance for the nonprofit organization.

- Bank staff provides support for an organization that provides services to military families. Many of the families are LMI. FNBA staff provides financial education classes for the families.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the service test in the Fairbanks MSA and the Kenai, Kodiak, and Sitka, nonmetropolitan AAs and other rural areas of the state is not inconsistent with the bank's overall Outstanding rating. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full scope”) and those that received a less comprehensive review (designated by the term “limited scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/10 to 12/31/12) Investment and Service Tests and CD Loans: (01/01/11 to 12/31/2013)	
Financial Institution		Products Reviewed
First National Bank Alaska (FNBA) Anchorage, Alaska		HMDA, Small Loans to Businesses and Farms, Community Development Loans, Services and Investments
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Anchorage MSA	Full Scope	
Bethel	Limited Scope	
Denali		
Fairbanks		
Haines Klukwan		
Juneau		
Kenai		
Kodiak		
Sitka		
Valdez Cordova		

Appendix B: Summary of State Ratings

RATINGS		First National Bank Alaska		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
First National Bank Alaska	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Market Profiles for Full-Scope Areas

Anchorage MSA

Demographic Information for Full Scope Area: FNBA Anchorage						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	1.27%	29.11%	51.90%	17.72%	0.00%
Population by Geography	380,821	2.03%	24.82%	53.76%	19.39%	0.00%
Owner-Occupied Housing by Geography	87,632	0.48%	16.01%	58.29%	25.23%	0.00%
Businesses by Geography	44,494	1.18%	27.42%	50.65%	20.74%	0.00%
Farms by Geography	672	1.04%	19.49%	59.08%	20.39%	0.00%
Family Distribution by Income Level	91,429	19.60%	18.01%	23.62%	38.77%	0.00%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,392	3.25%	34.31%	53.79%	8.64%	0.00%
Median Family Income	= \$82,861			Median Housing Value	= \$242,183	
HUD Adjusted Median Family Income for Anchorage	= \$85,200			Unemployment Rate	= 4.04%	
Households Below the Poverty Level	= 7.00%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census and 2012 HUD updated MFI.

The Anchorage Mat-Su MSA is the largest assessment area in the state including the entire Anchorage Municipality (020) and the Matanuska Susitna Borough (170). FNBA has ten branches located in Anchorage and two branches located in the Mat-Su Valley, within the 79 census tracts in the bank's delineated assessment area. Total lending for the area was \$1.47 billion, or nearly 60% of the bank's overall lending. More than half of Alaska's population resides in the adjoining south-central areas encompassing the Municipality of Anchorage and the Matanuska Susitna Borough. The two population centers are physically separated by two military bases, Elmendorf Air Force Base and Fort Richardson Army Base and the flats of the Matanuska and Knik Rivers.

Anchorage

Anchorage is a diverse and vibrant community. It is one of America's most livable cities, and is the state's largest city. Anchorage serves as the state's "hub" for communication, transportation, healthcare, finance, and trade meeting the vital needs of the private and public sectors. Anchorage has changed profoundly in the last 25 years as its economy has stabilized, and job and population growth has slowed. Its population has become more rooted. The demands of rapid growth have faded, and quality of life issues have moved to the forefront.

Mat-Su Valley

The Matanuska Susitna (Mat-Su) Borough lies in the heart of south-central Alaska, encompassing approximately 25,000 square miles. It is comprised of suburban areas, rural subdivisions, farmlands, remote communities, and vast wild lands. The majority of its residents reside along the two major roadways, the Parks and Glenn Highways. A mere drive of 30 miles reflects drastic differences in community composition and dynamics. Remote outposts without electricity or running water contrast with upscale housing developments with modern amenities. Despite a robust economy supported by construction, education, health care, government, social services, retail, and agriculture, a substantial portion of the population commutes to other areas for employment. The two highways have been instrumental in linking the southern portion of the area, commonly referred to as “The Valley” with Anchorage. The Valley is a suburban area with three incorporated communities, Houston, Wasilla, and Palmer. The area is the fastest growing area of the state, partially because of the improved access provided by roadways and also the low-cost of land for development purposes.

A community contact completed with a local nonprofit indicated that the state’s geography often presents challenges to providing services to various LMI communities. Alaska’s geographic separation from the “Lower 48,” has resulted in limited resources for nonprofits, affordable housing developers, and social service agencies. Despite its challenges, there are still numerous loan, investment, and service opportunities for financial institutions.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and percentage Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this Performance Evaluation.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: FNB ALASKA				Evaluation Period: January 01, 2012 TO December 31, 2012						
MA/Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
2012 FNBA ANC MSA_Cty 020 and 170 AA	54.49	894	202,256	349	77,239	2	204	19	33,520	1,264	313,219	61.32
Limited Review:												
2012 FNBA Bethel AA	1.27	15	3,354	13	2,329	1	7	1	12,850	30	18,540	2.08
2012 FNBA Denali AA	1.27	9	1,969	20	3,025	0	0	0	0	29	4,994	0.78
2012 FNBA Fairbanks AA	10.68	115	21,923	129	23,728	0	0	2	3,435	245	49,086	7.47
2012 FNBA Haines Klukwan AA	1.71	27	3,968	11	2,144	1	12	1	200	40	6,324	2.14
2012 FNBA Juneau AA	1.49	21	4,372	13	2,521	0	0	1	4,040	35	10,933	5.87
2012 FNBA Kenai AA	21.31	285	57,887	194	26,696	8	804	5	5,804	492	91,191	11.77
2012 FNBA Kodiak AA	2.06	22	4,713	23	5,074	2	579	0	0	47	10,366	3.13
2012 FNBA Sitka AA	1.14	24	6,381	2	100	0	0	0	0	26	6,481	2.10
2012 FNBA Valdez AA	4.60	63	13,136	33	3,615	9	837	1	200	106	17,788	3.32

* Loan Data as of December 31, 2012. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: FNB ALASKA								Evaluation Period: January 01, 2012 TO December 31, 2012					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2012 FNBA ANC MSA_Cty 020 and 170 AA	217	59.45	0.48	0.00	16.01	15.67	58.29	56.68	25.23	27.65	2.66	0.00	2.96	2.61	2.67
Limited Review:															
2012 FNBA Bethel AA	7	1.92	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	18.92	0.00	0.00	0.00	18.92
2012 FNBA Denali AA	5	1.37	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	35.71	0.00	0.00	35.71	0.00
2012 FNBA Fairbanks AA	23	6.30	2.36	4.35	7.72	8.70	59.95	47.83	29.97	39.13	1.52	2.08	1.53	1.22	2.08
2012 FNBA Haines Klukwan AA	6	1.64	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	35.29	0.00	0.00	35.29	0.00
2012 FNBA Juneau AA	3	0.82	0.00	0.00	0.00	0.00	27.85	0.00	72.15	100.0	0.59	0.00	0.00	0.00	0.78
2012 FNBA Kenai AA	67	18.36	0.00	0.00	0.56	0.00	97.80	100.0	1.65	0.00	8.47	0.00	0.00	8.51	0.00
2012 FNBA Kodiak AA	5	1.37	0.00	0.00	7.11	0.00	92.89	100.0	0.00	0.00	4.27	0.00	0.00	4.50	0.00
2012 FNBA Sitka AA	3	0.82	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	11.11	0.00	0.00	11.11	0.00
2012 FNBA Valdez AA	29	7.95	0.00	0.00	0.00	0.00	76.27	65.52	23.73	34.48	19.08	0.00	0.00	17.92	21.74

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census Information ****Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: FNB ALASKA								Evaluation Period: January 01, 2012 TO December 31, 2012					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2012 FNBA ANC MSA_Cty 020 and 170 AA	80	70.18	0.48	0.00	16.01	16.25	58.29	52.50	25.23	31.25	13.86	0.00	12.75	12.77	17.36
Limited Review:															
2012 FNBA Bethel AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00
2012 FNBA Denali AA	2	1.75	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	66.67	0.00	0.00	66.67	0.00
2012 FNBA Fairbanks AA	11	9.65	2.36	0.00	7.72	0.00	59.95	45.45	29.97	54.55	6.63	0.00	0.00	5.81	9.68
2012 FNBA Haines Klukwan AA	1	0.88	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	33.33	0.00	0.00	33.33	0.00
2012 FNBA Juneau AA	2	1.75	0.00	0.00	0.00	0.00	27.85	0.00	72.15	100.0	2.99	0.00	0.00	0.00	3.77
2012 FNBA Kenai AA	10	8.77	0.00	0.00	0.56	0.00	97.80	100.0	1.65	0.00	15.63	0.00	0.00	15.87	0.00
2012 FNBA Kodiak AA	5	4.39	0.00	0.00	7.11	20.00	92.89	80.00	0.00	0.00	19.23	0.00	20.00	19.05	0.00
2012 FNBA Sitka AA	2	1.75	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	22.22	0.00	0.00	22.22	0.00
2012 FNBA Valdez AA	1	0.88	0.00	0.00	0.00	0.00	76.27	0.00	23.73	100.0	12.50	0.00	0.00	0.00	33.33

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census Information

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Refinance		Geography: FNB ALASKA								Evaluation Period: January 01, 2012 TO December 31, 2012					
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2012 FNBA ANC MSA_Cty 020 and 170 AA	585	59.75	0.48	0.00	16.01	11.79	58.29	56.92	25.23	31.28	3.94	0.00	3.72	4.06	3.89
Limited Review:															
2012 FNBA Bethel AA	7	0.72	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	9.72	0.00	0.00	0.00	9.72
2012 FNBA Denali AA	2	0.20	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	8.70	0.00	0.00	8.70	0.00
2012 FNBA Fairbanks AA	79	8.07	2.36	1.27	7.72	11.39	59.95	51.90	29.97	35.44	3.16	1.75	5.20	2.77	3.57
2012 FNBA Haines Klukwan AA	20	2.04	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	38.46	0.00	0.00	38.46	0.00
2012 FNBA Juneau AA	16	1.63	0.00	0.00	0.00	0.00	27.85	25.00	72.15	75.00	1.51	0.00	0.00	1.49	1.52
2012 FNBA Kenai AA	206	21.04	0.00	0.00	0.56	0.00	97.80	99.51	1.65	0.49	12.05	0.00	0.00	12.12	5.26
2012 FNBA Kodiak AA	12	1.23	0.00	0.00	7.11	8.33	92.89	91.67	0.00	0.00	4.58	0.00	4.35	4.60	0.00
2012 FNBA Sitka AA	19	1.94	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	14.84	0.00	0.00	14.84	0.00
2012 FNBA Valdez AA	33	3.37	0.00	0.00	0.00	0.00	76.27	69.70	23.73	30.30	22.92	0.00	0.00	19.66	37.04

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census Information

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

Table 5. Geographic Distribution of Multi-Family Loans

Geographic Distribution: Multi-Family		Geography: FNB ALASKA						Evaluation Period: January 01, 2012 TO December 31, 2012									
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:																	
2012 FNBA ANC MSA_Cty 020 and 170 AA	12	70.59	3.45	0.00	44.50	66.67	44.86	25.00	7.19	8.33	34.29	0.00	44.44	20.00	100.0		
Limited Review:																	
2012 FNBA Bethel AA	1	5.88	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	100.0	0.00	0.00	0.00	0.00	100.0	
2012 FNBA Denali AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Fairbanks AA	2	11.76	13.71	0.00	44.54	100.0	33.57	0.00	8.19	0.00	22.22	0.00	50.00	0.00	0.00	0.00	
2012 FNBA Haines Klukwan AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Juneau AA	0	0.00	0.00	0.00	0.00	0.00	24.77	0.00	75.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Kenai AA	2	11.76	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	40.00	0.00	0.00	40.00	0.00	0.00	
2012 FNBA Kodiak AA	0	0.00	0.00	0.00	36.38	0.00	63.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Sitka AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Valdez AA	0	0.00	0.00	0.00	0.00	0.00	70.70	0.00	29.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census Information

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses		Geography: FNB ALASKA								Evaluation Period: January 01, 2012 TO December 31, 2012					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2012 FNBA ANC MSA_Cty 020 and 170 AA	349	44.40	1.18	2.29	27.42	28.65	50.65	54.44	20.74	14.61	4.28	6.30	5.04	4.80	3.20
Limited Review:															
2012 FNBA Bethel AA	13	1.65	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	17.39	0.00	22.73	18.18	26.53
2012 FNBA Denali AA	20	2.54	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	26.32	0.00	0.00	34.48	0.00
2012 FNBA Fairbanks AA	128	16.28	3.55	0.00	34.89	50.78	42.20	33.59	19.36	15.63	6.07	0.00	9.31	5.73	5.19
2012 FNBA Haines Klukwan AA	11	1.40	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	9.17	0.00	0.00	17.46	0.00
2012 FNBA Juneau AA	13	1.65	0.00	0.00	0.00	0.00	25.73	30.77	74.27	69.23	2.18	0.00	0.00	1.72	2.67
2012 FNBA Kenai AA	194	24.68	0.00	0.00	0.18	0.00	97.78	98.97	2.03	1.03	12.20	0.00	0.00	15.11	7.69
2012 FNBA Kodiak AA	23	2.93	0.00	0.00	25.32	43.48	74.68	56.52	0.00	0.00	6.19	0.00	14.71	5.90	0.00
2012 FNBA Sitka AA	2	0.25	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	0.93	0.00	0.00	1.02	0.00
2012 FNBA Valdez AA	33	4.20	0.00	0.00	0.00	0.00	70.13	72.73	29.87	27.27	11.75	0.00	0.00	15.48	15.66

*Based on 2012 Peer Small Business Data -- AK

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

*** Source Data - Dun and Bradstreet (2012).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms												Geography: FNB ALASKA				Evaluation Period: January 01, 2012 TO December 31, 2012				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
2012 FNBA ANC MSA_Cty 020 and 170 AA	2	9.09	1.04	0.00	19.49	50.00	59.08	50.00	20.39	0.00	3.57	0.00	14.29	3.33	0.00					
Limited Review:																				
2012 FNBA Bethel AA	1	4.55	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	100.0	0.00	100.0	0.00	100.0					
2012 FNBA Denali AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
2012 FNBA Fairbanks AA	0	0.00	0.67	0.00	22.67	0.00	52.00	0.00	24.67	0.00	0.00	0.00	0.00	0.00	0.00					
2012 FNBA Haines Klukwan AA	1	4.55	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	9.09	0.00	0.00	12.50	0.00					
2012 FNBA Juneau AA	0	0.00	0.00	0.00	0.00	0.00	31.34	0.00	68.66	0.00	0.00	0.00	0.00	0.00	0.00					
2012 FNBA Kenai AA	8	36.36	0.00	0.00	0.00	0.00	97.22	100.0	2.78	0.00	9.20	0.00	0.00	11.27	0.00					
2012 FNBA Kodiak AA	1	4.55	0.00	0.00	18.42	0.00	81.58	100.0	0.00	0.00	6.45	0.00	0.00	8.33	0.00					
2012 FNBA Sitka AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
2012 FNBA Valdez AA	9	40.91	0.00	0.00	0.00	0.00	55.10	0.00	44.90	100.0	27.27	0.00	0.00	0.00	47.37					

*Based on 2012 Peer Small Business Data -- AK

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

*** Source Data - Dun and Bradstreet (2012).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: FNB ALASKA										Evaluation Period: January 01, 2012 TO December 31, 2012				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
2012 FNBA ANC MSA_Cty 020 and 170 AA	217	59.45	19.60	7.77	18.01	20.39	23.62	24.27	38.77	47.57	2.76	3.13	2.11	2.11	3.77	
Limited Review:																
2012 FNBA Bethel AA	7	1.92	14.36	0.00	10.66	0.00	22.70	50.00	52.28	50.00	17.14	0.00	0.00	60.00	11.54	
2012 FNBA Denali AA	5	1.37	10.18	0.00	15.93	0.00	23.45	20.00	50.44	80.00	38.46	0.00	0.00	25.00	44.44	
2012 FNBA Fairbanks AA	23	6.30	20.02	9.09	18.09	18.18	24.27	22.73	37.62	50.00	1.62	1.36	0.87	1.13	3.53	
2012 FNBA Haines Klukwan AA	6	1.64	13.45	0.00	27.31	16.67	24.90	50.00	34.34	33.33	35.29	0.00	25.00	60.00	33.33	
2012 FNBA Juneau AA	3	0.82	11.55	0.00	15.01	0.00	18.66	0.00	54.78	100.0	0.68	0.00	0.00	0.00	1.39	
2012 FNBA Kenai AA	67	18.36	19.76	3.33	16.23	28.33	21.95	13.33	42.05	55.00	8.20	4.44	9.34	3.62	11.62	
2012 FNBA Kodiak AA	5	1.37	21.17	0.00	20.32	0.00	19.25	60.00	39.26	40.00	4.63	0.00	0.00	8.82	3.77	
2012 FNBA Sitka AA	3	0.82	17.44	0.00	16.18	0.00	24.67	33.33	41.71	66.67	12.50	0.00	0.00	12.50	20.00	
2012 FNBA Valdez AA	29	7.95	18.85	0.00	17.79	0.00	16.96	27.59	46.40	72.41	20.28	0.00	0.00	15.69	28.77	

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Families is based on 2010 Census information.

****As a percentage of loans with borrower income information available. No information is available for 5.5% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement			Geography: FNB ALASKA								Evaluation Period: January 01, 2012 TO December 31, 2012				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
2012 FNBA ANC MSA_Cty 020 and 170 AA	80	70.18	19.60	7.79	18.01	14.29	23.62	28.57	38.77	49.35	13.58	8.70	8.80	13.50	18.10
Limited Review:															
2012 FNBA Bethel AA	0	0.00	14.36	0.00	10.66	0.00	22.70	0.00	52.28	0.00	0.00	0.00	0.00	0.00	0.00
2012 FNBA Denali AA	2	1.75	10.18	0.00	15.93	0.00	23.45	0.00	50.44	100.0	50.00	0.00	0.00	0.00	100.0
2012 FNBA Fairbanks AA	11	9.65	20.02	0.00	18.09	18.18	24.27	36.36	37.62	45.45	6.71	0.00	4.76	7.84	9.09
2012 FNBA Haines Klukwan AA	1	0.88	13.45	0.00	27.31	0.00	24.90	100.0	34.34	0.00	33.33	0.00	0.00	50.00	0.00
2012 FNBA Juneau AA	2	1.75	11.55	0.00	15.01	0.00	18.66	50.00	54.78	50.00	3.08	0.00	0.00	6.67	2.44
2012 FNBA Kenai AA	10	8.77	19.76	10.00	16.23	10.00	21.95	30.00	42.05	50.00	15.87	25.00	20.00	18.75	13.16
2012 FNBA Kodiak AA	5	4.39	21.17	0.00	20.32	0.00	19.25	100.0	39.26	0.00	19.23	0.00	0.00	50.00	0.00
2012 FNBA Sitka AA	2	1.75	17.44	0.00	16.18	0.00	24.67	50.00	41.71	50.00	22.22	0.00	0.00	50.00	16.67
2012 FNBA Valdez AA	1	0.88	18.85	0.00	17.79	0.00	16.96	0.00	46.40	100.0	12.50	0.00	0.00	0.00	33.33

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Families is based on 2010 Census information.

****As a percentage of loans with borrower income information available. No information is available for 3.5% of loans originated and purchased by bank Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2).

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Refinance		Geography: FNB ALASKA										Evaluation Period: January 01, 2012 TO December 31, 2012				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
2012 FNBA ANC MSA_Cty 020 and 170 AA	585	59.75	19.60	7.89	18.01	19.27	23.62	27.16	38.77	45.69	5.41	8.01	5.70	5.15	5.16	
Limited Review:																
2012 FNBA Bethel AA	7	0.72	14.36	0.00	10.66	14.29	22.70	0.00	52.28	85.71	12.73	0.00	20.00	0.00	15.38	
2012 FNBA Denali AA	2	0.20	10.18	0.00	15.93	0.00	23.45	50.00	50.44	50.00	11.11	0.00	0.00	9.09	33.33	
2012 FNBA Fairbanks AA	79	8.07	20.02	9.21	18.09	18.42	24.27	27.63	37.62	44.74	4.38	4.49	3.55	3.90	5.26	
2012 FNBA Haines Klukwan AA	20	2.04	13.45	21.05	27.31	21.05	24.90	21.05	34.34	36.84	43.18	50.00	57.14	33.33	41.18	
2012 FNBA Juneau AA	16	1.63	11.55	12.50	15.01	12.50	18.66	18.75	54.78	56.25	2.16	11.76	3.28	1.57	1.91	
2012 FNBA Kenai AA	206	21.04	19.76	5.00	16.23	15.00	21.95	25.00	42.05	55.00	13.90	12.35	13.70	12.72	14.75	
2012 FNBA Kodiak AA	12	1.23	21.17	0.00	20.32	0.00	19.25	18.18	39.26	81.82	5.73	0.00	0.00	3.51	7.56	
2012 FNBA Sitka AA	19	1.94	17.44	0.00	16.18	15.79	24.67	26.32	41.71	57.89	17.76	0.00	23.08	15.15	18.97	
2012 FNBA Valdez AA	33	3.37	18.85	0.00	17.79	6.45	16.96	22.58	46.40	70.97	28.44	0.00	11.76	25.93	34.92	

*Based on 2012 Peer Mortgage Data (WE)

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

*** Percentage of Families is based on 2010 Census information.

****As a percentage of loans with borrower income information available. No information is available for 5.4% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses					Geography: FNB ALASKA			Evaluation Period: January 01, 2012 TO December 31, 2012	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses** *	% BANK Loans****	\$100,000 or less	from \$100,000 to \$250,000	from \$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
2012 FNBA ANC MSA_Cty 020 and 170 AA	349	44.40	71.78	47.28	44.41	27.51	28.08	4.28	4.77
Limited Review:									
2012 FNBA Bethel AA	13	1.65	66.04	53.85	46.15	23.08	30.77	17.39	19.30
2012 FNBA Denali AA	20	2.54	64.58	50.00	45.00	40.00	15.00	26.32	27.03
2012 FNBA Fairbanks AA	128	16.28	72.44	53.13	52.34	29.69	17.97	6.07	8.26
2012 FNBA Haines Klukwan AA	11	1.40	71.52	45.45	63.64	9.09	27.27	9.17	8.77
2012 FNBA Juneau AA	13	1.65	68.92	53.85	53.85	15.38	30.77	2.18	2.78
2012 FNBA Kenai AA	194	24.68	71.61	73.20	62.89	21.13	15.98	12.20	15.54
2012 FNBA Kodiak AA	23	2.93	71.92	56.52	39.13	39.13	21.74	6.19	7.39
2012 FNBA Sitka AA	2	0.25	70.95	100.0	100.0	0.00	0.00	0.93	1.64
2012 FNBA Valdez AA	33	4.20	65.71	60.61	69.70	15.15	15.15	11.75	13.64

*Based on 2012 Peer Small Business Data -- AK

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B -2012).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.15% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms					Geography: FNB ALASKA			Evaluation Period: January 01, 2012 TO December 31, 2012		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	from \$100,000 to \$250,000	from \$250,000 to \$500,000	All	Rev \$1 Million or Less	
Full Review:										
2012 FNBA ANC MSA_Cty 020 and 170 AA	2	9.09	96.88	100.0	50.00	50.00	0.00	3.57	5.13	
Limited Review:										
2012 FNBA Bethel AA	1	4.55	100.0	100.0	100.0	0.00	0.00	100.0	100.0	
2012 FNBA Denali AA	0	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Fairbanks AA	0	0.00	98.67	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Haines Klukwan AA	1	4.55	100.0	100.0	100.0	0.00	0.00	9.09	11.11	
2012 FNBA Juneau AA	0	0.00	89.55	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Kenai AA	8	36.36	93.89	100.0	75.00	12.50	12.50	9.20	12.12	
2012 FNBA Kodiak AA	1	4.55	86.84	100.0	100.0	0.00	0.00	6.45	9.76	
2012 FNBA Sitka AA	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00	
2012 FNBA Valdez AA	9	40.91	91.84	88.89	66.67	33.33	0.00	27.27	29.63	

*Based on 2012 Peer Small Business Data -- AK

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B -2012).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FNB ALASKA			Evaluation Period: January 01, 2011 TO December 31, 2013						
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area:	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope:									
2012 FNBA ANC MSA_Cty 020 and 170 AA	2	7,714	96	4,226	98	11,940	29.19	0	0
Limited Scope:									
2012 FNBA Bethel AA	1	4,057	6	29	7	4,086	9.99	0	0
2012 FNBA Denali AA	0	0	0	0	0	0	0.00	0	0
2012 FNBA Fairbanks AA	1	235	12	90	13	325	0.79	0	0
2012 FNBA Haines Klukwan AA	1	895	1	1	2	896	2.19	0	0
2012 FNBA Juneau AA	1	552	9	10,030	10	10,582	25.87	0	0
2012 FNBA Kenai AA	0	0	26	13,068	13	13,068	31.94	0	0
2012 FNBA Kodiak AA	0	0	1	1	1	1	0.01	0	0
2012 FNBA Sitka AA	0	0	5	2	5	2	0.01	0	0
2012 FNBA Valdez AA	0	0	6	11	6	11	0.01	0	0

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

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: FNB ALASKA				Evaluation Period: January 01, 2012 TO December 31, 2012										
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population						
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Income of Geographies (%)														
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp					
Full Scope:																		
2012 FNBA ANC MSA_Cty 020 and 170 AA	61.32	12	40.00	0	50	50	0	0	0	0	0	0	0	0	2.03	24.82	53.76	19.39
Limited Scope:																		
2012 FNBA Bethel AA	2.08	1	3.33	0	0	0	100	0	0	0	0	0	0	0	0.00	0.00	0.00	100.0
2012 FNBA Denali AA	0.78	1	3.33	0	0	100	0	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
2012 FNBA Fairbanks AA	7.47	3	10.00	0	33.33	33.33	33.33	0	0	0	0	0	0	0	3.50	19.17	52.24	25.08
2012 FNBA Haines Klukwan AA	2.14	1	3.33	0	0	100	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00	
2012 FNBA Juneau AA	5.87	3	10.00	0	0	33.33	66.67	0	0	0	0	0	0	0.00	0.00	32.89	67.11	
2012 FNBA Kenai AA	11.77	4	13.33	0	0	100	0	0	0	0	0	0	0	0.00	0.67	97.71	1.62	
2012 FNBA Kodiak AA	3.13	1	3.33	0	100	0	0	0	0	0	0	0	0	0.00	20.01	79.99	0.00	
2012 FNBA Sitka AA	2.10	1	3.33	0	0	100	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00	
2012 FNBA Valdez AA	3.32	3	10.00	0	0	66.67	33.33	0	0	0	0	0	0	0.00	0.00	76.50	23.50	

Institution ID: FIRST NATIONAL BANK ALASKA (10000012072) (Included)

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																		Geography: FNB ALASKA				Evaluation Period: January 01, 2012 TO December 31, 2012			
MA/Assessment	Deposits		Branches				ATMs				Population														
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
Full Scope:																									
2012 FNBA ANC MSA_Cty 020 and 170 AA	61.32	12	40.00	0	50	50	0	14	43.75	0	7	7	0	2.03	24.82	53.76	19.39								
Limited Scope:																									
2012 FNBA Bethel AA	2.08	1	3.33	0	0	0	100	0	0.00	0	0	0	0	0.00	0.00	0.00	100.0								
2012 FNBA Denali AA	0.78	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.0	0.00								
2012 FNBA Fairbanks AA	7.47	3	10.00	0	33.33	33.33	33.33	4	12.50	0	1	1	2	3.50	19.17	52.24	25.08								
2012 FNBA Haines Klukwan AA	2.14	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.0	0.00								
2012 FNBA Juneau AA	5.87	3	10.00	0	0	33.33	66.67	3	9.38	0	0	1	2	0.00	0.00	32.89	67.11								
2012 FNBA Kenai AA	11.77	4	13.33	0	0	100	0	4	12.50	0	0	4	0	0.00	0.67	97.71	1.62								
2012 FNBA Kodiak AA	3.13	1	3.33	0	100	0	0	1	3.13	0	1	0	0	0.00	20.01	79.99	0.00								
2012 FNBA Sitka AA	2.10	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.0	0.00								
2012 FNBA Valdez AA	3.32	3	10.00	0	0	66.67	33.33	3	9.38	0	0	2	1	0.00	0.00	76.50	23.50								

Institution ID: FIRST NATIONAL BANK ALASKA (10000012072) (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: FNB ALASKA				Evaluation Period: January 01, 2010 TO December 31, 2011						
MA/Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
2011 FNBA ANC MSA_Cty 020 and 170 AA	52.91	1,134	262,004	780	167,552	3	355	15	17,995	1,932	447,906	69.54
Limited Review:												
2011 FNBA Bethel AA	0.69	10	2,230	15	2,336	0	0	0	0	25	4,566	2.03
2011 FNBA Denali AA	1.66	21	3,168	39	7,880	0	0	0	0	60	11,048	0.78
2011 FNBA Fairbanks AA	11.40	112	22,740	300	48,429	1	24	3	23,876	416	95,069	7.90
2011 FNBA Haines AA	2.07	33	5,367	33	2,890	9	345	0	0	75	8,602	2.34
2011 FNBA Juneau AA	1.63	34	6,773	25	6,365	0	0	1	1,093	60	14,231	6.34
2011 FNBA Kenai AA	22.11	410	75,229	368	41,028	23	2,762	3	4,766	804	123,785	1.38
2011 FNBA Kodiak AA	2.82	40	9,152	39	5,861	23	4,066	0	0	102	19,079	3.41
2011 FNBA Sitka AA	0.94	23	4,821	9	679	2	464	0	0	34	5,964	1.90
2011 FNBA Valdez AA	3.78	79	14,211	46	6,859	12	1,197	1	200	138	22,467	4.38

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: FNB ALASKA								Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2011 FNBA ANC MSA_Cty 020 and 170 AA	367	59.58	0.41	0.54	11.58	12.26	58.54	67.30	29.47	19.89	2.43	0.00	3.61	2.86	1.16
Limited Review:															
2011 FNBA Bethel AA	4	0.65	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	11.76	0.00	0.00	11.76	0.00
2011 FNBA Denali AA	6	0.97	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	28.57	0.00	0.00	0.00	28.57
2011 FNBA Fairbanks AA	36	5.84	0.00	0.00	2.86	0.00	67.77	63.89	29.37	36.11	1.20	0.00	0.00	1.06	1.80
2011 FNBA Haines AA	17	2.76	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	31.25	0.00	0.00	31.25	0.00
2011 FNBA Juneau AA	10	1.62	0.00	0.00	0.00	0.00	27.92	20.00	72.08	80.00	1.29	0.00	0.00	1.55	1.21
2011 FNBA Kenai AA	125	20.29	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	9.66	0.00	0.00	9.66	0.00
2011 FNBA Kodiak AA	11	1.79	0.00	0.00	0.00	0.00	28.03	27.27	71.97	72.73	2.63	0.00	0.00	2.38	2.73
2011 FNBA Sitka AA	2	0.32	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	4.88	0.00	0.00	4.88	0.00
2011 FNBA Valdez AA	38	6.17	0.00	0.00	34.23	13.16	0.00	0.00	65.77	86.84	12.75	0.00	20.00	0.00	11.49

*Based on 2011 Peer Mortgage Data (WE)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: FNB ALASKA								Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2011 FNBA ANC MSA_Cty 020 and 170 AA	98	58.68	0.41	1.02	11.58	10.20	58.54	58.16	29.47	30.61	7.95	33.33	2.27	8.75	7.61
Limited Review:															
2011 FNBA Bethel AA	1	0.60	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Denali AA	1	0.60	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	100.0	0.00	0.00	0.00	100.0
2011 FNBA Fairbanks AA	13	7.78	0.00	0.00	2.86	7.69	67.77	69.23	29.37	23.08	3.13	0.00	0.00	3.85	1.89
2011 FNBA Haines AA	1	0.60	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	50.00	0.00	0.00	50.00	0.00
2011 FNBA Juneau AA	1	0.60	0.00	0.00	0.00	0.00	27.92	0.00	72.08	100.0	0.00	0.00	0.00	0.00	0.00
2011 FNBA Kenai AA	39	23.35	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	17.95	0.00	0.00	17.95	0.00
2011 FNBA Kodiak AA	7	4.19	0.00	0.00	0.00	0.00	28.03	42.86	71.97	57.14	21.43	0.00	0.00	33.33	18.18
2011 FNBA Sitka AA	1	0.60	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Valdez AA	5	2.99	0.00	0.00	34.23	0.00	0.00	0.00	65.77	100.0	37.50	0.00	0.00	0.00	75.00

*Based on 2011 Peer Mortgage Data (WE)

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

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

2000 Census Information

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Refinance		Geography: FNB ALASKA								Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2011 FNBA ANC MSA_Cty 020 and 170 AA	636	59.61	0.41	0.47	11.58	5.50	58.54	58.18	29.47	35.85	2.90	3.92	2.29	2.98	2.87
Limited Review:															
2011 FNBA Bethel AA	4	0.37	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	5.00	0.00	0.00	5.00	0.00
2011 FNBA Denali AA	14	1.31	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	50.00	0.00	0.00	0.00	50.00
2011 FNBA Fairbanks AA	58	5.44	0.00	0.00	2.86	3.45	67.77	65.52	29.37	31.03	1.39	0.00	0.00	1.20	1.90
2011 FNBA Haines AA	14	1.31	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	14.29	0.00	0.00	14.29	0.00
2011 FNBA Juneau AA	23	2.16	0.00	0.00	0.00	0.00	27.92	26.09	72.08	73.91	1.13	0.00	0.00	1.09	1.14
2011 FNBA Kenai AA	243	22.77	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	8.90	0.00	0.00	8.90	0.00
2011 FNBA Kodiak AA	22	2.06	0.00	0.00	0.00	0.00	28.03	36.36	71.97	63.64	5.92	0.00	0.00	10.20	4.17
2011 FNBA Sitka AA	19	1.78	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	5.50	0.00	0.00	5.50	0.00
2011 FNBA Valdez AA	34	3.19	0.00	0.00	34.23	11.76	0.00	0.00	65.77	88.24	13.13	0.00	5.00	0.00	15.19

*Based on 2011 Peer Mortgage Data (WE)

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

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

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

Table 5. Geographic Distribution of Multi-Family Loans

Geographic Distribution: Multi-Family					Geography: FNB ALASKA					Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2011 FNBA ANC MSA_Cty 020 and 170 AA	33	71.74	5.61	6.06	44.56	39.39	43.34	36.36	6.49	18.18	39.13	20.00	54.55	21.43	40.00
Limited Review:															
2011 FNBA Bethel AA	1	2.17	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	100.0	0.00	0.00	100.0	0.00
2011 FNBA Denali AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Fairbanks AA	5	10.87	0.00	0.00	13.33	20.00	72.84	60.00	13.83	20.00	57.14	0.00	50.00	60.00	0.00
2011 FNBA Haines AA	1	2.17	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	100.0	0.00	0.00	100.0	0.00
2011 FNBA Juneau AA	0	0.00	0.00	0.00	0.00	0.00	20.04	0.00	79.96	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Kenai AA	3	6.52	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	75.00	0.00	0.00	75.00	0.00
2011 FNBA Kodiak AA	0	0.00	0.00	0.00	0.00	0.00	46.22	0.00	53.78	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Sitka AA	1	2.17	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Valdez AA	2	4.35	0.00	0.00	12.29	50.00	0.00	0.00	87.71	50.00	0.00	0.00	0.00	0.00	0.00

*Based on 2011 Peer Mortgage Data (WE)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses		Geography: FNB ALASKA								Evaluation Period: January 01, 2010 TO December 31, 2011						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
2011 FNBA ANC MSA_Cty 020 and 170 AA	780	47.16	1.65	3.72	23.57	27.05	51.13	52.56	23.65	16.67	4.66	13.46	4.92	4.96	3.58	
Limited Review:																
2011 FNBA Bethel AA	15	0.91	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	9.73	0.00	10.00	10.14	0.00	
2011 FNBA Denali AA	39	2.36	0.00	0.00	0.00	0.00	0.00	0.00	100.0	100.0	23.17	0.00	0.00	0.00	24.68	
2011 FNBA Fairbanks AA	300	18.14	0.00	0.00	4.63	9.33	70.25	73.00	25.11	17.67	8.03	0.00	8.05	8.56	7.07	
2011 FNBA Haines AA	33	2.00	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	29.49	0.00	0.00	29.87	0.00	
2011 FNBA Juneau AA	25	1.51	0.00	0.00	0.00	0.00	25.15	44.00	74.85	56.00	1.42	0.00	0.00	1.39	1.43	
2011 FNBA Kenai AA	368	22.25	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	9.87	0.00	0.00	10.39	0.00	
2011 FNBA Kodiak AA	39	2.36	0.00	0.00	0.00	0.00	42.97	43.59	57.03	56.41	4.54	0.00	0.00	3.90	5.70	
2011 FNBA Sitka AA	9	0.54	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	1.77	0.00	0.00	1.80	0.00	
2011 FNBA Valdez AA	46	2.78	0.00	0.00	30.31	17.39	0.00	0.00	69.69	82.61	6.21	0.00	3.96	0.00	7.66	

*Based on 2011 Peer Small Business Data -- AK

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

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: FNB ALASKA								Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2011 FNBA ANC MSA_Cty 020 and 170 AA	3	4.11	0.64	0.00	15.50	33.33	60.06	66.67	23.80	0.00	2.86	0.00	0.00	4.65	0.00
Limited Review:															
2011 FNBA Bethel AA	0	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	100.0	0.00	100.0	0.00	0.00
2011 FNBA Denali AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Fairbanks AA	1	1.37	0.00	0.00	1.46	0.00	70.80	0.00	27.74	100.0	8.33	0.00	0.00	0.00	33.33
2011 FNBA Haines AA	9	12.33	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	45.45	0.00	0.00	45.45	0.00
2011 FNBA Juneau AA	0	0.00	0.00	0.00	0.00	0.00	30.36	0.00	69.64	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Kenai AA	23	31.51	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	11.00	0.00	0.00	11.22	0.00
2011 FNBA Kodiak AA	23	31.51	0.00	0.00	0.00	0.00	42.86	39.13	57.14	60.87	15.58	0.00	0.00	12.82	18.42
2011 FNBA Sitka AA	2	2.74	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	8.33	0.00	0.00	8.33	0.00
2011 FNBA Valdez AA	12	16.44	0.00	0.00	21.28	0.00	0.00	0.00	78.72	100.0	17.14	0.00	0.00	0.00	19.35

*Based on 2011 Peer Small Business Data -- AK

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: FNB ALASKA										Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
2011 FNBA ANC MSA_Cty 020 and 170 AA	367	59.58	19.38	7.29	17.65	21.28	24.19	29.45	38.77	41.98	2.47	3.45	1.89	2.28	2.93		
Limited Review:																	
2011 FNBA Bethel AA	4	0.65	21.99	0.00	15.58	0.00	16.02	33.33	46.41	66.67	12.50	0.00	0.00	0.00	22.22		
2011 FNBA Denali AA	6	0.97	14.54	0.00	12.78	0.00	17.62	60.00	55.07	40.00	33.33	0.00	0.00	0.00	33.33		
2011 FNBA Fairbanks AA	36	5.84	16.30	0.00	15.32	24.24	23.17	24.24	45.22	51.52	1.31	0.00	1.10	1.07	2.65		
2011 FNBA Haines AA	17	2.76	27.12	11.76	17.10	29.41	22.96	23.53	32.82	35.29	34.48	0.00	50.00	28.57	35.71		
2011 FNBA Juneau AA	10	1.62	11.74	0.00	12.94	11.11	20.22	44.44	55.11	44.44	1.30	0.00	1.49	1.31	1.27		
2011 FNBA Kenai AA	125	20.29	21.22	6.56	17.29	9.84	22.76	27.05	38.74	56.56	9.90	5.56	5.77	8.38	14.29		
2011 FNBA Kodiak AA	11	1.79	14.84	0.00	14.10	0.00	20.28	12.50	50.78	87.50	2.11	0.00	0.00	2.08	3.85		
2011 FNBA Sitka AA	2	0.32	12.65	0.00	15.86	0.00	24.41	50.00	47.08	50.00	5.00	0.00	0.00	6.67	5.00		
2011 FNBA Valdez AA	38	6.17	18.57	0.00	16.01	13.89	19.97	33.33	45.44	52.78	13.00	0.00	23.08	11.11	12.20		

*Based on 2011 Peer Mortgage Data (WE)

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

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

****As a percentage of loans with borrower income information available. No information is available for 6.2% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: FNB ALASKA						Evaluation Period: January 01, 2010 TO December 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****		Overall	Low	Mod	Mid	Upp
Full Review:																
2011 FNBA ANC MSA_Cty 020 and 170 AA	98	58.68	19.38	7.61	17.65	18.48	24.19	27.17	38.77	46.74	7.90	3.95	9.52	8.21	8.33	
Limited Review:																
2011 FNBA Bethel AA	1	0.60	21.99	0.00	15.58	0.00	16.02	0.00	46.41	100.0	0.00	0.00	0.00	0.00	0.00	
2011 FNBA Denali AA	1	0.60	14.54	0.00	12.78	0.00	17.62	0.00	55.07	100.0	100.0	0.00	0.00	0.00	100.0	
2011 FNBA Fairbanks AA	13	7.78	16.30	20.00	15.32	10.00	23.17	30.00	45.22	40.00	1.96	0.00	0.00	1.89	4.00	
2011 FNBA Haines AA	1	0.60	27.12	0.00	17.10	100.0	22.96	0.00	32.82	0.00	50.00	0.00	50.00	0.00	0.00	
2011 FNBA Juneau AA	1	0.60	11.74	0.00	12.94	0.00	20.22	0.00	55.11	100.0	0.00	0.00	0.00	0.00	0.00	
2011 FNBA Kenai AA	39	23.35	21.22	5.26	17.29	15.79	22.76	18.42	38.74	60.53	17.95	0.00	9.09	31.25	18.42	
2011 FNBA Kodiak AA	7	4.19	14.84	0.00	14.10	0.00	20.28	42.86	50.78	57.14	21.43	0.00	0.00	0.00	42.86	
2011 FNBA Sitka AA	1	0.60	12.65	0.00	15.86	0.00	24.41	100.0	47.08	0.00	0.00	0.00	0.00	0.00	0.00	
2011 FNBA Valdez AA	5	2.99	18.57	0.00	16.01	20.00	19.97	40.00	45.44	40.00	37.50	0.00	0.00	66.67	25.00	

*Based on 2011 Peer Mortgage Data (WE)

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

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

****As a percentage of loans with borrower income information available. No information is available for 6.0% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Refinance		Geography: FNB ALASKA										Evaluation Period: January 01, 2010 TO December 31, 2011					
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
2011 FNBA ANC MSA_Cty 020 and 170 AA	636	59.61	19.38	5.04	17.65	17.22	24.19	27.65	38.77	50.09	3.62	4.17	3.41	3.46	3.73		
Limited Review:																	
2011 FNBA Bethel AA	4	0.37	21.99	0.00	15.58	25.00	16.02	0.00	46.41	75.00	6.25	0.00	0.00	0.00	8.70		
2011 FNBA Denali AA	14	1.31	14.54	7.14	12.78	14.29	17.62	21.43	55.07	57.14	55.00	100.0	100.0	60.00	46.15		
2011 FNBA Fairbanks AA	58	5.44	16.30	7.84	15.32	15.69	23.17	25.49	45.22	50.98	1.80	1.09	1.56	0.96	2.92		
2011 FNBA Haines AA	14	1.31	27.12	15.38	17.10	23.08	22.96	23.08	32.82	38.46	11.11	0.00	0.00	10.00	16.67		
2011 FNBA Juneau AA	23	2.16	11.74	9.52	12.94	4.76	20.22	33.33	55.11	52.38	1.46	15.38	0.00	1.28	1.29		
2011 FNBA Kenai AA	243	22.77	21.22	4.85	17.29	17.18	22.76	24.23	38.74	53.74	9.65	3.41	12.14	7.17	11.09		
2011 FNBA Kodiak AA	22	2.06	14.84	0.00	14.10	19.05	20.28	14.29	50.78	66.67	6.57	0.00	8.33	6.45	6.33		
2011 FNBA Sitka AA	19	1.78	12.65	0.00	15.86	11.11	24.41	22.22	47.08	66.67	7.41	0.00	0.00	8.70	9.76		
2011 FNBA Valdez AA	34	3.19	18.57	0.00	16.01	9.09	19.97	21.21	45.44	69.70	15.79	0.00	14.29	30.77	12.96		

*Based on 2011 Peer Mortgage Data (WE)

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

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

****As a percentage of loans with borrower income information available. No information is available for 8.4% of loans originated and purchased by bank.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses					Geography: FNB ALASKA		Evaluation Period: January 01, 2010 TO December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses** *	% BANK Loans****	\$100,000 or less	from \$100,000 to \$250,000	from \$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
2011 FNBA ANC MSA_Cty 020 and 170 AA	780	47.16	66.02	45.51	49.49	24.62	25.90	4.66	4.16	
Limited Review:										
2011 FNBA Bethel AA	15	0.91	61.28	73.33	60.00	13.33	26.67	9.73	12.86	
2011 FNBA Denali AA	39	2.36	54.04	41.03	51.28	23.08	25.64	23.17	16.98	
2011 FNBA Fairbanks AA	300	18.14	67.13	49.33	55.33	26.67	18.00	8.03	8.27	
2011 FNBA Haines AA	33	2.00	63.50	69.70	81.82	12.12	6.06	29.49	34.00	
2011 FNBA Juneau AA	25	1.51	63.85	28.00	44.00	24.00	32.00	1.42	0.67	
2011 FNBA Kenai AA	368	22.25	63.94	69.29	69.57	21.20	9.24	9.87	10.22	
2011 FNBA Kodiak AA	39	2.36	67.54	64.10	58.97	25.64	15.38	4.54	4.83	
2011 FNBA Sitka AA	9	0.54	64.11	66.67	77.78	22.22	0.00	1.77	2.21	
2011 FNBA Valdez AA	46	2.78	57.53	50.00	65.22	19.57	15.22	6.21	4.67	

*Based on 2011 Peer Small Business Data -- AK

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B -2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.39% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms				Geography: FNB ALASKA		Evaluation Period: January 01, 2010 TO December 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	from \$100,000 to \$250,000	from \$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
2011 FNBA ANC MSA_Cty 020 and 170 AA	3	4.11	96.01	100.0	66.67	33.33	0.00	2.86	3.85
Limited Review:									
2011 FNBA Bethel AA	0	0.00	100.0	0.00	0.00	0.00	0.00	100.0	100.0
2011 FNBA Denali AA	0	0.00	100.0	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Fairbanks AA	1	1.37	97.81	100.0	100.0	0.00	0.00	8.33	9.09
2011 FNBA Haines AA	9	12.33	100.0	88.89	88.89	11.11	0.00	45.45	62.50
2011 FNBA Juneau AA	0	0.00	87.50	0.00	0.00	0.00	0.00	0.00	0.00
2011 FNBA Kenai AA	23	31.51	92.68	100.0	56.52	30.43	13.04	11.00	12.22
2011 FNBA Kodiak AA	23	31.51	85.71	78.26	47.83	17.39	34.78	15.58	17.24
2011 FNBA Sitka AA	2	2.74	97.22	50.00	50.00	0.00	50.00	8.33	5.00
2011 FNBA Valdez AA	12	16.44	93.62	83.33	66.67	25.00	8.33	17.14	17.24

*Based on 2011 Peer Small Business Data -- AK

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B -2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: FNB ALASKA				Evaluation Period: January 01, 2010 TO December 31, 2011											
MA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Income of Geographies (%)															
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp						
Full Scope:																			
2011 FNBA ANC MSA_Cty 020 and 170 AA	69.54	12	40.00	8.33	50	41.67	0	0	0	0	0	0	0	0	0	1.09	21.27	54.73	22.91
Limited Scope:																			
2011 FNBA Bethel AA	2.03	1	3.33	0	0	100	0	0	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
2011 FNBA Denali AA	0.78	1	3.33	0	0	0	100	0	0	0	0	0	0	0	0	0.00	0.00	0.00	100.0
2011 FNBA Fairbanks AA	7.90	3	10.00	0	0	66.67	33.33	0	0	0	0	0	0	0	0	0.00	6.23	67.22	26.55
2011 FNBA Haines AA	2.34	1	3.33	0	0	100	0	0	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
2011 FNBA Juneau AA	6.34	3	10.00	0	0	33.33	66.67	0	0	0	0	0	0	0	0	0.00	0.00	32.10	67.90
2011 FNBA Kenai AA	1.38	4	13.33	0	0	100	0	0	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
2011 FNBA Kodiak AA	3.41	1	3.33	0	0	100	0	0	0	0	0	0	0	0	0	0.00	0.00	34.25	65.75
2011 FNBA Sitka AA	1.90	1	3.33	0	0	100	0	0	0	0	0	0	0	0	0	0.00	0.00	100.0	0.00
2011 FNBA Valdez AA	4.38	3	10.00	0	33.33	0	66.67	0	0	0	0	0	0	0	0	0.00	31.69	0.00	68.31

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Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: FNB ALASKA				Evaluation Period: January 01, 2010 TO December 31, 2011											
MA/Assessment Area:	Deposits	Branches						ATMs				Population							
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Scope:																			
2011 FNBA ANC MSA_Cty 020 and 170 AA	69.54	12	40.00	8.33	50	41.67	0	14	43.75	1	7	6	0	1.09	21.27	54.73	22.91		
Limited Scope:																			
2011 FNBA Bethel AA	2.03	1	3.33	0	0	100	0	0	0.00	0	0	0	0	0.00	0.00	100.0	0.00		
2011 FNBA Denali AA	0.78	1	3.33	0	0	0	100	1	3.13	0	0	0	1	0.00	0.00	0.00	100.0		
2011 FNBA Fairbanks AA	7.90	3	10.00	0	0	66.67	33.33	4	12.50	0	0	2	2	0.00	6.23	67.22	26.55		
2011 FNBA Haines AA	2.34	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.0	0.00		
2011 FNBA Juneau AA	6.34	3	10.00	0	0	33.33	66.67	3	9.38	0	0	1	2	0.00	0.00	32.10	67.90		
2011 FNBA Kenai AA	1.38	4	13.33	0	0	100	0	4	12.50	0	0	4	0	0.00	0.00	100.0	0.00		
2011 FNBA Kodiak AA	3.41	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	34.25	65.75		
2011 FNBA Sitka AA	1.90	1	3.33	0	0	100	0	1	3.13	0	0	1	0	0.00	0.00	100.0	0.00		
2011 FNBA Valdez AA	4.38	3	10.00	0	33.33	0	66.67	3	9.38	0	1	0	2	0.00	31.69	0.00	68.31		