



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**Wachovia Bank of Delaware, National Association
Charter Number: 22559**

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Office of the Comptroller of the Currency

**Large Bank Supervision
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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 CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **Wachovia Bank of Delaware, National Association**, with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wachovia Bank of Delaware, N. A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
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 level of lending, good distributions among borrowers of different income levels, and adequate distributions among geographies of different income levels.
- A level of community development lending coupled with a level of lending of innovative and flexible products that positively impacted the Lending Test rating.
- A good level of qualified community development investments.
- An excellent distribution of branches accompanied by a minimal 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 MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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 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 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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 household 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 or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan 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, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

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 MA/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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income: 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) and the Thrift Financial Reporting (TFR) instructions. 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Wachovia Bank of Delaware, National Association (WBD), Wilmington, Delaware, is an intrastate bank with total assets of approximately \$2.6 billion and Tier One Capital of approximately \$210 million. WBD operates 21 full-service branches and 45 automated teller machines (ATM) in all three counties in Delaware.

WBD is a subsidiary of Wachovia Corporation (WC), an interstate financial holding company with headquarters in Charlotte, North Carolina, and total assets approximating \$350 billion. WC operates approximately 2,800 full-service branches and approximately 4,700 ATMs in 11 states and the District of Columbia. Most of that operation is through its primary subsidiary, Wachovia Bank, National Association.

WBD formerly operated as a state-chartered institution, first as a subsidiary of Corestates Financial and subsequently as First Union Bank of Delaware. In June 2000, that bank was merged with First Union Home Equity Bank, National Association, and the resulting institution was called First Union National Bank of Delaware. Following the merger of the former First Union Corporation and the former Wachovia Corporation, the name of the bank was changed to its current form in April 2002.

WBD's primary strategy has been consumer focused. With a loan portfolio of approximately \$1.5 billion, loans secured by 1-4 family residences approximate \$1.1 billion or 71% of the total loan portfolio.

WBD's last CRA evaluation was performed in 1997 with a rating of Satisfactory. There are no legal or financial impediments to impede the bank's ability to meet the credit needs within the state of Delaware.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Unless otherwise noted, conclusions drawn throughout this evaluation are based upon bank performance during calendar years 1999 and 2000.

Data Integrity

As part of this evaluation, the public information filed by WBD on home mortgage and small loans to businesses was tested for accuracy. The test included an evaluation of the bank's processes to ensure that the data is reliable. We found no significant errors in the reported data. In addition, we found other information provided for consideration to also be reliable. We tested the community development loan, investment, and service information submitted by Wachovia management to ensure that the regulatory definition was met. As a result, we excluded from this evaluation any information submitted for consideration that did not meet the community development definition or purpose.

Selection of Areas for Full-Scope Review

We selected all three assessment areas within the state of Delaware for our review. For additional information regarding the makeup of these assessment areas (AAs), please refer to Appendix A.

Ratings

The bank's overall rating is based on those areas that received full-scope reviews. The full-scope AAs were weighted in proportion to the share of deposits held in the various assessment areas. Since the vast majority of the operations, assets, and deposits of the bank are contained in the Wilmington-Newark MSA, the rating was very significantly influenced by the performance of the bank in this AA. In addition, since the bank originated a very small amount of small loans to farms during the assessment period, we did not include this lending as part of our analysis.

Other

We contacted four different community development organizations within Delaware to obtain information about the bank's performance under the CRA. In addition, these contacts also assisted us in obtaining information for use in our community profiles. We also obtained information from other regulatory sources to aid us in our evaluation. Some of this information is included in the market profiles section found in Appendix B.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is good in the Wilmington-Newark MSA, good in the Dover MSA, and adequate in the Sussex Non-MSA.

Lending Activity

Refer to Table 1, Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Wilmington-Newark

Lending activity in the Wilmington-Newark MSA is excellent. With the ninth deposit market rank, the bank has the tenth, ninth, and second market ranks for home purchase, home improvement and home refinance loans respectively. In addition, for small business lending the bank has a seventh market rank for deposit taking institutions.

Dover

Lending activity in the Dover MSA is excellent. With the fifth deposit market rank, the bank has the tenth, fourth, and second market ranks for home purchase, home improvement and home refinance loans respectively. In addition, for small business lending the bank has an eighth market rank for deposit taking institutions.

Sussex

Lending activity in Sussex County is excellent. With the eighth deposit market rank, the bank has the ninth, fifth, and tenth market ranks for home purchase, home improvement and home refinance loans respectively. In addition, for small business lending the bank has the thirteenth market rank for deposit taking institutions.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

Wilmington-Newark

Home purchase loan geographic distribution within the Wilmington-Newark MSA is adequate. The portion of loans made in low-income geographies is well below the percent of owner occupied units in like geographies. In moderate-income geographies, the percent of loans made exceeds the percent of owner occupied units in like geographies. In addition, the market share of loans in low- and moderate-income geographies is well below and exceeds the bank's overall market share within the MSA respectively.

Home improvement loan geographic distribution is good. The percent of loans originated in low-income geographies is below the percent of owner occupied units in like geographies. The percent of loans made in moderate-income geographies exceeds the percent of owner occupied units in like geographies. The market share of loans in low- and moderate-income geographies is significantly below and exceeds the bank's overall market share within the MSA respectively.

Home refinance loan geographic distribution is adequate. The percent of loans originated in low- and moderate-income geographies is near the percent of owner occupied units in like geographies. The market share of loans in low- and moderate-income geographies is well below and is below the bank's overall market share within the MSA respectively.

Dover

Home purchase loan geographic distribution is poor. The portion of loans made in moderate-income geographies is well below the percent of owner occupied units in like geographies. This performance is mitigated by the low number of owner occupied units as well as the high poverty level in this AA. In addition, the market share of home purchase loans in moderate-income geographies is also well below the bank's overall market share within the MSA.

Home improvement loan geographic distribution is excellent. The portion of loans originated in moderate-income geographies exceeds the percent of owner occupied units in like geographies. In addition, the market share of home improvement loans in moderate-income geographies also exceeds the bank's overall market share within the MSA.

Home refinance loan geographic distribution is good. The portion of loans originated in moderate-income geographies exceeds the percent of owner occupied units in like geographies. In addition, the market share of home refinance loans in moderate-income geographies is below the bank's overall market share within the MSA.

Sussex

Since there are no low- or moderate-income census tracts within the assessment area, we did not conduct an analysis of the distribution of loans by income level of the geography.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Wilmington-Newark

The geographic distribution of small loans to businesses in the Wilmington-Newark MSA is good. The portion of loans originated in low-income geographies is significantly below the percent of businesses in like geographies. The portion of loans originated in moderate-income geographies is near the percent of businesses in like geographies. The bank's market share of loans in low-income geographies is below the bank's overall market share of small loans to businesses in the MSA. In addition, the market share of loans in moderate-income geographies exceeds the bank's overall market share of small loans to businesses in the MSA.

Dover

The geographic distribution of small loans to businesses in the Dover MSA is poor. The portion of loans originated in moderate-income geographies is well below the percent of businesses in like geographies. This performance is mitigated in that very few businesses are located in these geographies. The bank's market share of loans in moderate-income geographies is also well below the bank's overall market share of small business loans in the MSA.

Sussex

Since there are no low- or moderate-income census tracts within the assessment area, we did not conduct an analysis of the distribution of loans by income level of the geography.

Lending Gap Analysis

We performed a lending gap analysis of the HMDA and small loans to businesses for both the Wilmington-Newark and Dover MSAs. Since there are no low- or moderate-income geographies within Sussex County, we did not perform a gap analysis for this assessment area. We did not identify any unexplained conspicuous gaps within the assessment areas we reviewed.

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

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

Wilmington-Newark

Home purchase loan borrower distribution is excellent. The portion of loans originated to low-income borrowers exceeds the percent of low-income families within the MSA. The portion of loans to moderate-income borrowers exceeds the percent of moderate-income families within the MSA. In addition, the market share of loans to low- and moderate-income families is below and near the bank's overall market share for that type of loan within the MSA respectively.

Home improvement loan borrower distribution is excellent. The portion of loans originated to low- and moderate-income borrowers exceeds the percent of low- and moderate-income families within the MSA respectively. The market share of loans originated to LMI families is near the bank's overall market share for that type of loan.

Home refinance loan borrower distribution is good. The portion of loans originated to low- and moderate-income borrowers exceeds the percent of low- and moderate-income families within the MSA respectively. The market share of loans to LMI families is below the bank's overall market share for that type of loan.

Dover

Home purchase loan borrower distribution is excellent. The portion of loans originated to low-income borrowers is near the percent of low-income families within the MSA. Also, the portion of loans originated to moderate-income borrowers exceeds the percent of moderate-income families within the MSA. The market share of home purchase loans to low- and moderate-income borrowers exceeds and is below the bank's market share for that type of loan respectively.

Home improvement loan borrower distribution is adequate. The portion of loans originated to low-income borrowers is well below the percent of low-income families within the MSA. However, the portion of loans originated to moderate-income borrowers exceeds the percent of moderate-income families within the MSA. In addition, the market share of loans to low- and moderate-income families is well below and exceeds the bank's market share for that type of loan within the MSA respectively.

Home refinance loan borrower distribution is adequate. The number of loans originated to low-income borrowers is significantly below the percent of low-income families within the MSA. The number of loans made to moderate-income borrowers is near the percent of moderate-income families within the MSA. In addition, the market share of loans to low- and moderate-income families is well below and below the bank's market share for that type of loan respectively.

Sussex

Home purchase loan borrower distribution is poor. The portion of loans originated to low-income families is well below the percent of low-income families within the county. The portion of loans originated to moderate-income families is well below the percent of moderate-income families within the county. The market share of loans made to low-income families is near the bank's overall market share for home purchase loans within the county. The market share of loans made to moderate-income families is well below the bank's market share for home purchase loans within the county.

Home improvement loan borrower distribution is adequate. The portion of loans originated to low-income families is well below the percent of low-income families within the county. The portion of loans originated to moderate-income families is below the percent of moderate-income families within the county. The market share of loans made to low- and moderate-income families is below and exceeds the bank's overall market share for this type of loan within the county respectively.

Home refinance loan borrower distribution is adequate. The portion of loans originated to low-income families is well below the percent of low-income families within the county. The portion of loans made to moderate-income families is near the percent of moderate-income families within the county. The market share of loans to low-income families is well below the bank's overall market share for this type of loan in the county. In addition, the market share of loans to moderate-income families is below the bank's overall market share for this type of loan within the county.

Small Loans to Businesses

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

Wilmington-Newark

The borrower distribution of small loans to businesses is good in the Wilmington-Newark MSA. The percentage of loans to small businesses is greater than the percent of small businesses in the MSA. The bank's market share of small loans to businesses is below its overall business loan market share. The bank also makes a high majority of these loans in smaller amounts.

Dover

The borrower distribution of small loans to businesses in the Dover MSA is adequate. The percentage of loans to small businesses is near the percent of small businesses in the MSA. The bank's market share of small loans to businesses is below its overall business loan market share. The bank also makes a majority of these loans in smaller amounts.

Sussex

The borrower distribution of small loans to businesses in Sussex County is adequate. The percentage of loans to small businesses is near the percent of small businesses in the MSA. The bank's market share of loans to small businesses is significantly below its overall business loans market share. The bank also makes a majority of these loans in smaller amounts.

Community Development Lending

Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development (CD) loans, including multifamily loans that also qualify as CD loans.

Wilmington-Newark

Community development lending had a positive impact on lending performance in the Wilmington-Newark MSA. During the evaluation, the bank originated two loans totaling \$2.9 million. The first loan was a \$2,650,000 loan to a charter school for the construction of the new charter school in a low-income census tract in downtown Wilmington. This charter school, also located in an Enterprise Zone, has a number of programs that specifically target low- and

moderate-income students. One of its major programs is to bridge the “digital divide” for marginalized youth to gain access to technology. The second loan was a \$250,000 bridge loan to a non-profit organization to assist in the development of new commercial/residential projects in economically distressed areas. The organization’s mission is to serve as a vehicle for community revitalization by taking direct action through the financing of, and investments in, housing and related activities throughout Delaware.

Dover

The bank did not originate any community development loans in the Dover MSA during the assessment period. This had a neutral impact on the Lending Test rating.

Sussex

The bank did not originate any community development loans in Sussex County during the assessment period. This had a neutral impact on the Lending Test rating.

Product Innovation and Flexibility

Wachovia has developed three home loan products that provide flexible terms and conditions that aid low- and moderate-income individuals in obtaining home loans. The three products are discussed below:

Affordable Home Mortgage Loan – this loan product features a low down payment that may come from the borrower’s funds, sweat equity, or a gift, grant or loan from someone other than the seller, builder or real estate professional. An additional requirement is that home ownership education is required for first-time homebuyers.

Neighborhood Development Mortgage – this loan product features a low down payment that may come from the borrower’s funds, sweat equity, or a gift, grant or loan from someone other than the seller, builder or real estate professional. An additional requirement is that the home must be located in a low- or moderate-income census tract.

Community Partnership Mortgage – this loan product features no down payment and closing costs can come from a gift, grant or a portion can be paid by the seller. In addition, the bank may also pay the closing costs for a slight increase in the interest rate. This product is available only through one of the bank’s community partners, and the borrower must receive home ownership education.

For all three products combined, Wachovia originated 325 loans for approximately \$34.2 million during the assessment period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is good in the Wilmington-Newark MSA, excellent in the Dover MSA and excellent in the Sussex Non-MSA AA.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Wilmington-Newark

WBD made 34 qualified community development investments totaling \$554 thousand during the assessment period. These consisted primarily of three investments totaling \$417 thousand. One of the investments was to a community development organization that promotes economic revitalization while two investments were to financial institutions that target low- and moderate-income residents. The remaining \$137 thousand consists of contributions to local community organizations supporting affordable housing, community service, and economic development, and revitalization objectives for low- and moderate-income persons or geographies.

WBD also had nine prior period investments totaling \$11.7 million outstanding at December 31, 2000. One of the outstanding investments was to the First Union Regional Foundation with a December 31, 2000 balance of \$5.2 million. This foundation was established to support community revitalization and individual empowerment in Delaware, New Jersey, and eastern Pennsylvania. This foundation funded two grants during the assessment period. The foundation gave \$700 thousand to the Wilmington Housing Partnership to support the revitalization of the lower eastside neighborhood of the city of Wilmington. In addition, they also provided a \$750 thousand three-year commitment to the Delaware Rural Housing Consortium. This grant was to support an innovative partnership that produced eleven housing projects with a variety of housing types throughout the state of Delaware. In addition to the aforementioned prior period investments, the bank also had almost \$6 million in Low-Income Housing Tax Credits outstanding that provided for the addition of 288 housing units.

Dover

WBD made 13 qualified community development investments totaling \$108 thousand during the assessment period. Of this amount, \$67 thousand consisted of an investment in the aforementioned Delaware Community Investment Corporation. The remaining \$41 thousand consists of contributions to local community organizations supporting affordable housing, community service, and economic development and revitalization objectives for low- and moderate-income persons or geographies.

WBD also had five prior period investments totaling \$5.8 million outstanding at December 31, 2000. A significant majority of this amount consists of the bank's investment in the aforementioned First Union Regional Foundation and the Delaware Community Investment

Corporation. In addition, positive consideration was given in the Dover MSA for the aforementioned commitment to the Delaware Rural Housing Consortium.

Sussex

WBD made six qualified community development investments totaling \$81 thousand during the assessment period. Of this amount, \$67 thousand consisted of an investment in the aforementioned Delaware Community Investment Corporation. The remaining \$14 thousand consists of contributions to local community organizations supporting affordable housing, community service, and economic development, and revitalization objectives for low- and moderate-income persons or geographies.

WBD also had five prior period investments totaling \$5.8 million outstanding at December 31, 2000. A significant majority of this amount consists of the bank's investment in the aforementioned First Union Regional Foundation and the Delaware Community Investment Corporation. In addition, positive consideration was given in the Sussex Non-MSA for the aforementioned commitment to the Delaware Rural Housing Consortium.

SERVICE TEST

The bank's performance under the Service Test is good in the Wilmington-Newark MSA, adequate in the Dover MSA, and adequate in the Sussex Non-MSA AA.

Retail Banking Services

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

Wilmington-Newark

Service delivery systems are readily accessible to geographies and individuals of different income levels. Approximately 6% of the bank's branches are in low-income geographies, which exceeds the 4% of the population residing in these tracts. In addition, 16.7% of the bank's branches are in moderate-income geographies, which is near the 16.8% of the population which resides in those tracts.

Branch openings and closings have not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies. During the assessment period, the bank closed one branch in a low-income area. As this branch did not have an outside public entrance and that the receiving branch was ¼ mile away, a minimal affect on service was noted. Hours and services do not vary in a way that inconveniences people living in the MSA.

In addition to traditional delivery systems, the bank also has a number of alternative delivery systems available to its customers. Wachovia has toll-free telephone banking that allows its customers to access essentially all of WBD's banking services over the phone lines. In

addition to telephone banking, customers with Internet access can also apply for credit products and perform deposit transactions at the bank's web sites wachovia.com or firstunion.com. Bank management was unable to provide any information on the impact of these systems on LMI individuals or geographies.

Dover

Service delivery systems are accessible to geographies and individuals of different income levels. WBD has two branches in the Dover MSA. One of the branches is in a middle-income census tract, and the other branch is in an upper income census tract. In addition, the bank has two full-service ATMs and three cash dispenser ATMs within the assessment area. The two full-service ATMs are attached to the aforementioned branches while the three cash dispenser are located in upper income census tracts. The bank did not open or close any branches within the assessment area during the evaluation period. In addition, hours and services do not vary in a way that inconveniences people living in the MSA.

Sussex

Service delivery systems are accessible to geographies and individuals of different income levels. WBD has one branch in Sussex County. The branch is located in a middle-income census tract and has a full-service ATM located there. The bank did not open or close any branches within the assessment area during the evaluation period. In addition, hours and services do not vary in a way that inconveniences people living in the MSA.

Community Development Services

Wilmington-Newark

WBD provides an adequate level of community development services in the Wilmington-Newark MSA. Wachovia continues to provide technical assistance regarding Low-Income Housing Tax Credits to an organization known as the National Council on Agricultural Life and Labor Research, Inc. (NCALL). NCALL's education services aid many low- and moderate-income families in obtaining homeownership. WBD has also held financial education seminars throughout Delaware geared toward low- and moderate-income individuals entitled "Gearing Up for Financial Security."

Dover

WBD provides a limited level of community development services in the Dover MSA. A WBD employee sits on the board of the YWCA of Newcastle, and conducts financial education seminars directed at low- and moderate-income individuals. In addition, Wachovia also aids this organization in its homeownership counseling, economic development, transitional housing, and career development activities targeted toward low- and moderate-income individuals.

Sussex

WBD provides few community development services within the Sussex assessment area. WBD officers are a part of the Delaware Community Affairs Group that meets quarterly to assess the ongoing community development needs within Sussex County. In addition, Wachovia is a principal sponsor of an organization called BorrowSmart. This organization has a national focus and is dedicated to improving education among all borrowers including low- and moderate-income borrowers who seek home equity loans.

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 non-metropolitan 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, Investment and Service Tests: (01/01/99 to 12/31/00)	
Financial Institution		Products Reviewed
Wachovia Bank of Delaware, N. A. (WBD) Wilmington, DE		HMDA, Small Business, Community Development Loans and Investments
Affiliate(s)	Affiliate Relationship	Products Reviewed
Wachovia Mortgage Corporation (WMC)	Subsidiary of Bank	HMDA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Dover MSA #2190 Wilmington-Newark MSA #9160 Sussex County	Full-Scope Full-Scope Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Wilmington-Newark MSA	B-2-3
Dover MSA.....	B-4-5
Sussex Non-MSA.....	B-6-7

Wilmington-Newark MSA

Demographic Information for Full-Scope Area: Wilmington-Newark MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	120	8	19	51	21	1
Population by Geography	441,946	4	17	54	25	0
Owner-Occupied Housing by Geography	112,040	2	14	55	29	0
Businesses by Geography	25,579	13	16	46	25	Nil
Farms by Geography	483	1	14	55	29	0
Family Distribution by Income Level	115,305	17	18	26	39	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	40,313	7	26	55	12	0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$44,332 = \$61,246 = 7.61%	Median Housing Value Unemployment Rate (December 2000)			= \$ 119,531 = 3.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Wilmington-Newark MSA consists of New Castle County. WBD has 25 full service ATMs and 14 cash dispenser ATMs in the assessment area. WBD has 18 branches in the assessment area.

As of June 30, 2000, deposits in the AA totaled \$1 billion or 89% of total franchise deposits. WBD is the ninth largest deposit holder in the AA with a market share of 2.23%. The bank's primary competitors in the market are Chase Manhattan Bank USA, NA (CMB), Wilmington Trust Company (WTC), and PNC Bank, Delaware (PNC). CMB is the second largest deposit holder in the AA with a 13.33% market share WTC is the third largest in the AA with a 9.38% market share and PNC is the fifth largest deposit holder in the AA with a 3.12% market share.

The Wilmington-Newark MSA has a well-diversified economy. Industry sectors with the greatest concentrations in employment include services, retail trade, finance, insurance and real estate, and manufacturing. Large employers include MBNA and E.I. du Pont de Nemours & Company. Also, the unemployment has remained low during the assessment period with a period low of 2.8% in May 1999 and a period high of 4.2% in July 1999.

Information was obtained from community contacts conducted by various bank regulatory agencies. The following needs of LMI individuals or areas were identified during these community contacts:

- More out the box creative thinking in finding ways to invest community development monies into the community
- Additional partnerships among financial institutions, increased accountability of financial institutions in a given project by providing for a significant amount of the project, and for open communication between the financial community and the community development organizations
- Affordable home purchase and rehabilitation financing
- Homeownership and credit counseling
- Affordable financing for small and minority owned business
- Affordable housing for LMI households
- Related services and financing for small and minority owned businesses
- Increased involvement through investments, grants, bridge and gap financing on community development projects
- Bilingual lenders.

Dover MSA

Demographic Information for Full-Scope Area: Dover MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0	7	77	16	0
Population by Geography	110,993	0	6	81	13	0
Owner-Occupied Housing by Geography	27,448	0	1	86	13	0
Businesses by Geography	6,086	0	2	85	13	0
Farms by Geography	374	0	1	94	5	0
Family Distribution by Income Level	29,470	19	18	25	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,094	0	8	86	7	0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$33,594 = \$46,504 = 10.88%	Median Housing Value Unemployment Rate (December 2000)			= \$ 80,196 = 4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Dover MSA consists of Kent County. WBD has two full service ATMs and three cash dispenser ATMs in the assessment area. WBD has two branches in the assessment area.

As of June 30, 2000, deposits in the Dover MSA totaled \$75 million, or 6.51% of total franchise deposits. WBD is the fifth largest deposit holder in the area with a market share of 6.95%. The bank's primary competitors in the market are Wilmington Trust Company (WTC), PNC Bank, Delaware (PNC) and First National Bank of Wyoming (FNB). WTC is the largest deposit holder in the AA with a 37.49% market share. PNC is the second largest deposit holder in the AA with a 21.79% market share and FNB the third largest deposit holder in the AA with a 13% market share.

The Dover MSA has a well-diversified economy. During the assessment period the unemployment rate held relatively steady at approximately 4%. Industry sectors with the greatest concentrations in employment include government, retail trade, services, and manufacturing. Large employers include the U.S. Air Force, the State of Delaware, Scott Paper, General Foods and Playtex.

Information was obtained from community contacts conducted by various bank regulatory agencies. The following needs of LMI individuals or areas were identified during these community contacts:

- Increased partnerships to fill financing gaps to developers of small business and affordable housing
- Technical assistance and marketing expertise
- Operating support in the form of grants to non-profit organizations
- Assistance in bringing together federal and state funds for community based organizations
- Funds for investments and loan pools
- Construction and rehabilitation of affordable housing especially for the elderly and migrant workers
- Developing infrastructure
- Increased involvement through investments, grants, bridge, and gap financing on community development projects
- Bilingual lenders.

Sussex Non-MSA

Demographic Information for Full-Scope Area: Sussex County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	0	0	75	4	21
Population by Geography	113,229	0	0	98	2	0
Owner-Occupied Housing by Geography	34,386	0	0	98	2	0
Businesses by Geography	8,560	0	0	91	9	0
Farms by Geography	486	0	0	98	2	0
Family Distribution by Income Level	32,150	18	19	24	38	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,943	0	0	99	1	0
Median Family Income = \$31,112 HUD Adjusted Median Family Income for 2000 = \$45,203 Households Below the Poverty Level = 11.2%						Median Housing Value = \$ 105,598 Unemployment Rate (December 2000) = 4.4%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Sussex Non-MSA AA consists of Sussex County. WBD has one branch and one full service ATM in the assessment area.

As of June 30, 2000, deposits in the Sussex County MSA totaled \$48 million, or 4.21% of total franchise deposits. WBD is the eighth largest deposit holder in the area with a market share of 0.33%. The bank's primary competitors in the market are Greenwood Trust Company (GTC), Wilmington Trust Company, (WTC) and PNC Bank, Delaware (PNC). GTC is the largest deposit holder in the MSA with an 89% market share, WTC is the second largest deposit holder with a 4.05% market share and PNC is the third largest deposit holder with a 1.94% market share.

Sussex County has a well-diversified economy. During the assessment period the unemployment rate was approximately 4%. Industry sectors with the greatest concentrations in employment include retail trade, services, and manufacturing.

Information was obtained from community contacts conducted by various bank regulatory agencies. The following needs of LMI individuals or areas were identified during these community contacts:

- Increased involvement through investments, grants, bridge and gap financing on community development projects
- Bilingual lenders

- Affordable housing for LMI families
- Subsidized housing, affordable rental housing and low priced homeownership opportunities
- Improve infrastructure problems
- Construction and rehabilitation of affordable housing especially for the elderly and migrant workers
- Developing infrastructure.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases 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. Tables without data are not included in this PE.

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. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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 13. Geographic and Borrower Distribution of Consumer Loans – Not applicable.

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. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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: DELAWARE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000	
MA/Assessment Area:	% 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 MA/AA ***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Dover	13.02	445	30,076	52	7,912	0	0	0	0	497	37,988	8.75			
Sussex Non-MSA	15.36	537	66,491	46	7,226	3	187	0	0	586	73,904	7.60			
Wilmington-Newark	71.62	2,231	172,408	489	50,958	11	889	2	2,900	2,733	227,155	83.64			
Limited Review:															

* Loan Data as of December 31, 2000. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 1, 1999 to December 31, 2000.

*** Deposit Data as of June 30, 2000. 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: DELAWARE					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dover	141	12.82	0.00	0.00	1.08	0.00	85.74	84.89	13.18	15.11	3.08	0.00	0.00	2.92	4.68	
Sussex Non-MSA	273	24.82	0.00	0.00	0.00	0.00	97.82	91.14	2.18	8.86	2.49	0.00	0.00	2.48	2.80	
Wilmington-Newark	686	62.36	1.76	0.15	14.19	15.79	55.36	53.65	28.69	30.41	3.15	0.76	5.38	2.58	3.38	
Limited Review:																

* Based on 2000 Peer Mortgage Data: Northeast Region.

** 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 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: DELAWARE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dover	82	12.01	0.00	0.00	1.08	1.22	85.74	90.24	13.18	8.54	7.78	0.00	11.11	7.84	6.52	
Sussex Non-MSA	43	6.30	0.00	0.00	0.00	0.00	97.82	95.35	2.18	4.65	4.09	0.00	0.00	4.17	0.00	
Wilmington-Newark	558	81.70	1.76	1.43	14.19	15.95	55.36	66.67	28.69	15.95	9.82	4.88	13.59	10.80	6.32	
Limited Review:																

* Based on 2000 Peer Mortgage Data: Northeast Region.

** 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 number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: DELAWARE					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,2000				
MA/Assessment Area:	Total Home Mortgage 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:																				
Dover	222	15.56	0.00	0.00	1.08	1.36	85.74	87.33	13.18	11.31	8.36	0.00	6.67	8.56	6.84					
Sussex Non-MSA	221	15.49	0.00	0.00	0.00	0.00	97.82	93.15	2.18	6.85	4.97	0.00	0.00	4.93	6.02					
Wilmington-Newark	984	68.96	1.76	1.53	14.19	12.42	55.36	59.47	28.69	26.58	8.03	1.82	6.72	8.66	8.06					
Limited Review:																				

* Based on 2000 Peer Mortgage Data: Northeast Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage 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 number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: DELAWARE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Dover	0	0.00	0.00	0.00	3.14	0.00	72.33	0.00	24.53	0.00	0.00	0.00	0.00	0.00	0.00
Sussex Non-MSA	0	0.00	0.00	0.00	0.00	0.00	76.85	0.00	23.15	0.00	0.00	0.00	0.00	0.00	0.00
Wilmington-Newark	3	100.00	3.80	0.00	18.18	66.67	61.02	33.33	17.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															

* Based on 2000 Peer Mortgage Data: Northeast Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: DELAWARE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Dover	52	8.86	0.00	0.00	0.83	0.00	83.50	88.46	15.67	11.54	1.56	0.00	0.00	1.61	1.27					
Sussex Non-MSA	46	7.84	0.00	0.00	0.00	0.00	86.36	84.78	13.64	15.22	0.59	0.00	0.00	0.47	1.87					
Wilmington-Newark	489	83.30	9.82	5.52	15.94	15.75	48.15	47.65	26.00	30.88	2.93	2.41	3.76	2.53	3.34					
Limited Review:																				

* Based on 2000 Peer Small Business Data: US.

** 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 2000.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: DELAWARE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
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:																					
Dover	0	0.00	0.00	0.00	0.00	0.00	92.05	0.00	7.95	0.00	0.00	0.00	0.00	0.00	0.00						
Sussex Non-MSA	3	21.43	0.00	0.00	0.00	0.00	97.20	100.00	2.80	0.00	9.09	0.00	0.00	9.52	0.00						
Wilmington-Newark	11	78.57	0.34	9.09	13.01	27.27	60.27	27.27	26.37	36.37	29.41	0.00	50.00	11.11	50.00						
Limited Review:																					

* Based on 2000 Peer Small Business Data: US.

** 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 2000.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: DELAWARE						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000							
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:															
Dover	93	13.52	19.31	17.20	18.34	32.26	24.73	27.96	37.61	22.58	3.08	3.74	2.63	1.99	1.97
Sussex Non-MSA	217	31.54	17.77	4.61	19.37	6.91	24.38	14.29	38.48	74.19	2.49	2.45	1.18	2.14	2.76
Wilmington-Newark	378	54.94	16.57	23.54	18.40	41.80	26.45	18.52	38.58	16.14	3.15	2.42	3.03	1.56	1.66
Limited Review:															

* Based on 2000 Peer Mortgage Data: Northeast Region.

** As a percentage of loans with borrower income information available. No information was available for 37% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: DELAWARE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans**						
Full Review:																
Dover	81	13.37	19.31	6.17	18.34	25.93	24.73	37.04	37.61	30.86	7.78	3.45	9.65	7.93	7.69	
Sussex Non-MSA	43	7.10	17.77	6.98	19.37	13.95	24.38	27.91	38.48	51.16	4.09	3.39	4.42	4.40	3.91	
Wilmington-Newark	482	79.54	16.57	18.46	18.40	34.85	26.45	28.63	38.58	18.05	9.82	9.13	9.29	10.22	6.54	
Limited Review:																

* Based on 2000 Peer Mortgage Data: Northeast Region.

** As a percentage of loans with borrower income information available. No information was available for 11% of loans originated and purchased by Bank.

*** Percentage of Families is based on the 1990 Census information.

**** 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: DELAWARE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
MA/Assessment Area:	Total Home Mortgage 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:																				
Dover	191	17.80	19.31	9.95	18.34	17.80	24.73	30.37	37.61	41.88	8.36	3.67	6.45	8.01	9.29					
Sussex Non-MSA	161	15.00	17.77	6.21	19.37	16.15	24.38	25.47	38.48	52.17	4.97	2.31	3.53	4.71	3.85					
Wilmington-Newark	721	67.19	16.57	15.40	18.40	27.05	26.45	28.29	38.58	29.26	8.03	5.84	6.17	6.49	7.52					
Limited Review:																				

^{*} Based on 2000 Peer Mortgage Data: Northeast Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 25% of loans originated and purchased by Bank.

^{***} Percentage of Families is based on the 1990 Census information.

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: DELAWARE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000		
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	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Dover	52	8.86	63.31	61.54	59.62	23.08	17.31	1.56	0.97
Sussex Non-MSA	46	7.84	68.26	63.16	60.87	17.39	21.74	0.59	0.26
Wilmington-Newark	489	83.30	65.57	70.00	76.89	13.29	9.82	2.93	1.60
Limited Review:									

* Based on 2000 Peer Small Business Data: US.

** 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 - 2000.

**** 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 63% 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: DELAWARE		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000		
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	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Dover	0	0	87.23	0	0	0	0	0.00	0.00
Sussex Non-MSA	3	21.43	82.31	33.33	66.67	33.33	0.00	9.09	5.00
Wilmington-Newark	11	78.57	82.25	36.36	81.82	18.18	0.00	29.41	25.00
Limited Review:									

* Based on 2000 Peer Small Business Data: US.

** 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 - 2000).

**** 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 [Percentage] of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DELAWARE				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Dover	6	5,816	13	108	19	5,924	24.59	0	0	
Sussex Non-MSA	5	5,791	6	81	11	5,872	24.38	0	0	
Wilmington-Newark	9	11,737	34	554	43	12,291	51.03	2	305	
Limited Review:										

* '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 BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: DELAWARE Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2000																	
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 Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dover	8.8	2	9.5	0.00	0.00	50.0	50.0	0	0	0	0	0	0	0.00	5.81	81.07	13.11
Sussex Non-MSA	7.6	1	4.8	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	0.00	98.15	1.85
Wilmington-Newark	83.6	18	85.7	5.60	16.7	38.9	38.9	0	3	-1	0	-2	0	3.86	16.80	53.87	25.47
Limited Review:																	