## CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2010

MAHA's Twentieth Annual Report on How Well Lenders and Regulators Are Meeting Their Obligations Under the Community Reinvestment Act

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## INTRODUCTION AND SUMMARY OF MAJOR FINDINGS

Since 1990, state and federal bank regulators have been required to make public their ratings of the performance of individual banks in serving the credit needs of local communities, in accordance with the provisions of the federal Community Reinvestment Act (CRA) and its Massachusetts counterpart. And since 1991, the Massachusetts Affordable Housing Alliance (MAHA) has issued annual reports offering a comprehensive listing and analysis of all CRA ratings of Massachusetts banks and credit unions. This is the twentieth report in this annual series.

This year's report incorporates the initial CRAlike ratings of licensed mortgage lenders issued by the state's Division of Banks in accordance with its regulation entitled "Mortgage Lender Community Investment" (MLCI). This regulation was adopted pursuant to passage of An Act Protecting and Preserving Homeownership in 2007, legislation that was a major MAHA legislative priority and was supported by a broad coalition of community organizations.<sup>1</sup>

As defined in this report, there were 171 "Massachusetts banks" as of January 1, 2011. This includes not only 162 banks that have headquarters in the state, but also nine large banks based elsewhere that have a substantial presence in the state. Table A-1 provides a listing of the 171 Massachusetts banks and their current CRA ratings. (Federallychartered banks—currently 36 of the 171 receive ratings only from their federal regulator; all other Massachusetts banks are state-chartered and receive ratings from both state and federal regulators.) Banks that operate in more than one state receive separate CRA ratings for each state as well as an overall CRA rating; for such banks, this report uses the CRA rating for their Massachusetts operations rather than the overall rating.<sup>2</sup> Table A-2 provides information on

the 35 banks that have branches both inside and outside of Massachusetts, including fourteen out-of-state banks that have a relatively small presence in the state and are not classified here as "Massachusetts banks." Table A-3 provides a listing of the current CRA ratings of the state's 90 state-chartered credit unions. Federally-chartered credit unions are not covered by CRA. Table A-4 provides a listing of all current CRA (MLCI) ratings of licensed mortgage lenders.

Tables 1–8 present information about the distribution of the most recent CRA ratings of banks, credit unions, and licensed mortgage lenders as of year-end 2010; about the distribution of CRA ratings awarded during the calendar year 2010 and during earlier years; and on the number and distribution of CRA ratings awarded annually by each of the four federal bank regulators and by the state's Division of Banks. Some of the notable findings contained in those tables may be summarized as follows:

- Of the 75 CRA ratings awarded to Massachusetts banks by all regulators combined during 2010, about one-sixth (17.4%) were "Outstanding." This percentage is in the same general range as the two preceding years (although somewhat higher than 16.0% in 2008 and 12.0% in 2009) and it remains dramatically lower than during the 2005-2007 period when over onethird of all CRA ratings were "Outstanding." (See Table 1.)
- The 69 total CRA ratings awarded to Massachusetts banks in 2010 were down from 75 in the previous year and from 94 in 2008. (See Table 1).
- When each bank is classified by its most recent CRA rating, just over one-fifth (20.7%) of all banks had a most recent rating of "Outstanding." This is down

<sup>&</sup>lt;sup>1</sup> The MLCI regulation (209 CMR 54.00), as well as a list of the MLCI ratings made public so far (with links to the performance evaluations), is available at the Division of Banking's website: <u>www.mass.gov/dob.</u>

 $<sup>^2</sup>$  To be more precise, banks with branches in more than one state receive not only an overall CRA rating, but also (1) a separate rating for each multistate metropolitan statistical area (MSA) within which they have branches in more than one state and (2) a separate rating for each state (the "state" rating excludes any part of the state covered by a multistate MSA rating). Since most of the Massachusetts activity of Bank of America and Sovereign is within multistate MSAs (e.g., the Boston MA–NH MSA) their "Massachusetts" CRA ratings are based on evaluation of only a small portion of their activity within the state. Therefore, their ratings in this report are those for these multistate MSAs.

three percentage points from the previous year and more than ten percentage points lower than the all-time high of 31.3% reached in 2007. Another 13.0% of banks had a most recent rating of "High Satisfactory," and 65.7% of all banks had a most recent rating of "Satisfactory." One bank, First Trade Union SB (Boston), has a most recent rating of "Needs to Improve." (See Table 2.)

- The state's ten biggest banks were all rated "Outstanding" in their most recent CRA exams. These ten banks, ranked by total deposits as reported by the FDIC for mid-2010, are: Bank of America, RBS Citizens, State Street, Sovereign, TD Bank, Eastern, Rockland Trust, Middlesex Savings, BNY Mellon NA, and Boston Private.<sup>3</sup> (See Table A-1 for ratings of all individual banks.)
- When banks are classified, for each regulator, in terms of the year in which they most recently received a CRA rating, the data reveal that 58.0% of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years. However, five banks have not received any CRA rating (either federal or state) within the last five years. Seven banks have not received a CRA rating from their federal regulator and 22 banks have not received a rating from the

**Division of Banks during the most recent five year period.**<sup>4</sup> This is inconsistent with policies calling for minimum intervals between bank evaluations of five years or less. (See Table 4.)

- The number of credit unions with "Outstanding" ratings fell from seven to six (6.7% of the 90 current statechartered credit unions). No credit union has received a rating of less than "Satisfactory" since 1997. Just ten ratings were awarded in 2010, far fewer than necessary to rate every credit union during a five-year period. As of year-end 2010, twelve credit unions had not received a CRA rating based on exam dated within the last five years; Everett CU's most recent exam is dated in 2000 and two others have recent exams dated in 2001. (Tables 5, 6, and A-3.)
- Twenty licensed mortgage lenders have now received ratings under the state's Mortgage Lender Community Investment (MLCI) regulation – six of these in late 2009 and fourteen more in 2010. These include four of the top ten licensed mortgage lenders, and twelve of the top 25. Seventeen lenders received a rating of "Satisfactory," and one lender each received ratings of "High Satisfactory," "Needs to Improve," and "Substantial Noncompliance." (See Tables 7 and A-4).

#### FOR ADDITIONAL INFORMATION:

 A great deal of information on the CRA (Community Reinvestment Act) in general, and on the CRA evaluation/examination/ rating system in particular is readily available on the web sites of the state's Division of Banks (<u>www.state.ma.us/dob</u>) and of the federal bank regulators: the Federal Deposit Insurance Corporation (<u>www.fdic.gov</u>); the Office of the Comptroller of the Currency (www.occ.treas.gov); the Office of Thrift Supervision (<u>www.ots.treas.gov</u>); and the Federal Reserve (<u>www.federalreserve.gov</u>).

• Almost all of the *Performance Evaluations* for Massachusetts banks, credit unions, and licensed mortgage lenders are available in their entirety at the websites of the regulators that prepared them, where they can be read on-line, down-loaded to one's own computer, or printed out.

<sup>&</sup>lt;sup>3</sup> BNY Mellon Bank (New York City), a sister bank to BNY Mellon NA (Pittsburgh), has \$6.6B of deposits in Massachusetts and ranks sixth on the FDIC's list. However, it is a wholesale bank whose CRA "assessment area" lies entirely within New York state and it is thus not counted as a Massachusetts bank for purposes of this report.

<sup>&</sup>lt;sup>4</sup> The discussion in this paragraph, and the data in Table 4 on which the discussion is based, do not hold a regulator responsible for banks that only recently begun doing business in Massachusetts and have not yet received a CRA rating from that regulator.

#### TABLE 1

	Nun	ber of Rat	ings	%	Outstandin	g	% Below Satisfactory*				
Year	Federal	Mass.	Total	Federal	Mass.	Total	Federal	Mass.	Total		
1991	56	54	110	5.4%	3.7%	4.5%	17.9%	20.4%	19.1%		
1992	88	109	197	10.2%	12.8%	11.7%	19.3%	18.3%	18.8%		
1993	97	55	152	15.5%	12.7%	14.5%	8.2%	7.3%	7.9%		
1994	137	38	175	10.2%	23.7%	13.1%	7.3%	2.6%	6.3%		
1995	120	119	239	24.2%	24.4%	24.3%	3.3%	0.8%	2.1%		
1996	106	98	204	32.1%	34.7%	33.3%	1.0%	1.0%	1.0%		
1997	88	71	159	28.4%	29.6%	28.9%	1.1%	0.0%	0.6%		
1998	82	77	159	25.6%	24.7%	25.2%	0.0%	0.0%	0.0%		
1999	83	78	161	16.9%	25.6%	21.1%	2.4%	0.0%	1.2%		
2000	48	50	98	29.2%	20.0%	24.5%	0.0%	0.0%	0.0%		
2001	39	38	77	15.4%	15.8%	15.6%	2.6%	2.6%	2.6%		
2002	46	37	83	15.2%	21.6%	18.1%	0.0%	0.0%	0.0%		
2003	55	23	78	18.2%	34.8%	23.1%	0.0%	0.0%	0.0%		
2004	69	30	99	24.6%	26.7%	25.3%	0.0%	0.0%	0.0%		
2005	53	41	94	35.8%	26.8%	31.9%	1.9%	0.0%	1.1%		
2006	40	32	72	40.0%	28.1%	34.7%	0.0%	0.0%	0.0%		
2007	35	19	54	40.0%	26.3%	35.2%	5.7%	0.0%	3.7%		
2008	57	37	94	17.5%	13.5%	16.0%	0.0%	0.0%	0.0%		
2009	50	25	75	12.0%	12.0%	12.0%	2.0%	0.0%	1.3%		
2010	43	26	69	18.6%	15.4%	17.4%	2.3%	0.0%	1.4%		

### NUMBER & PERCENT OF CRA RATINGS GIVEN TO MASSACHUSETTS BANKS THAT WERE "OUTSTANDING" OR BELOW "SATISFACTORY" -- 1991-2010

\* Since 1993, all ratings below "Satisfactory" have been "Needs to Improve"; in 1991-92, 7 of the 58 ratings below "Satisfactory" were "SubstantialNonCompliance."

TABLE 2 DISTRIBUTION OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2010

Date	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Active Banks	286	267	257	255	245	233	228	225	220	216	210	198	194	195	185	179	176	171
Rated Banks	262	264	257	254	243	230	227	223	219	213	207	197	194	192	182	177	173	169
'Outstanding"	32	39	57	76	70	63	57	48	47	46	44	50	51	54	57	49	41	35
"High Satisfactory"#	n/a	n/a	n/a	n/a	5	20	21	20	21	24	17	10	6	7	11	7	20	22
'Satisfactory"	198	205	196	176	168	147	147	154	150	143	146	137	136	130	112	119	112	111
Below 'Satisfactory'	32	20	4	2	0	0	2	1	1	0	0	0	1	1	2	2	0	1
% 'Outstanding"	12.2%	14.8%	22.2%	29.9%	28.8%	27.4%	25.1%	21.5%	21.5%	21.6%	21.3%	25.4%	26.3%	28.1%	31.3%	27.7%	23.7%	20.7%
% 'High Satisfactory'#	n/a	n/a	n/a	n/a	2.1%	8.7%	9.3%	9.0%	9.6%	11.3%	8.2%	5.1%	3.1%	3.6%	6.0%	4.0%	11.6%	13.0%
% "Satisfactory"	75.6%	77.7%	76.3%	69.3%	69.1%	63.9%	64.8%	69.1%	68.5%	67.1%	70.5%	69.5%	70.1%	67.7%	61.5%	67.2%	64.7%	65.7%
% Below 'Satisfactory''	12.2%	7.6%	1.6%	0.8%	0.0%	0.0%	0.9%	0.4%	0.5%	0.0%	0.0%	0.0%	0.5%	0.5%	1.1%	1.1%	0.0%	0.6%

# The rating of "High Satisfactory" was first awarded in mid-1997 and is available only from Massachusetts. For the 22 banks with a most recent rating of

'High Satisfactory,' all had federal ratings of 'Satisfactory' in concurrent state/federal exams, 1 had earlier federal rating of 'Outstanding' and 2 had earlier federal ratings

of "Satisfactory." In the case of concurrent federal and state exams that resulted in different ratings, the higher of the two ratings is regarded as the "most recent."

### TABLE 3 PUBLIC CRA RATINGS OF MASSACHUSETTS BANKS BY REGULATOR AND RATING, 1993-2010

		00	CC			01	٢S			FD	IC			]	MASS		[
	Out	Sat	NI	All	Out	Sat	NI	All	Out	Sat	NI	All	Out	HSat	Sat	NI	All
	Numbe	ers of R	ating	2													
1993	2	12	0	14	0	12	2	14	13	50	6	69	7	*	44	4	55
1995	$\frac{2}{0}$	8	0	8	1	12	1	14	13	<u> </u>	9	117	9	*	28	4	38
1994	1	6	0	7	0	9	1	12	28	72	3	103	29	*	 89	1	119
1996	1	6	0	7	4	8	0	10	29	57	1	87	34	*	63	1	98
1997	2	6	0	8	1	5	1	7	22	51	0	73	21	5	45	0	71
1998	0	2	0	2	3	6	0	9	18	53	0	71	19	19	39	0	77
1999	2	2	0	4	2	6	0	8	10	59	2	71	20	15	43	0	78
2000	0	1	0	1	0	1	0	1	14	32	0	46	10	6	34	0	50
2001	0	1	0	1	1	5	0	6	5	26	1	32	6	14	17	1	38
2002	0	1	0	1	0	3	0	3	7	35	0	42	8	10	19	0	37
2003	0	2	0	2	0	3	0	3	8	40	0	48	8	7	8	0	23
2004	0	3	0	3	2	5	0	7	14	44	0	58	8	5	17	0	30
2005	0	4	0	4	3	3	0	6	15	26	1	42	7	4	30	0	41
2006	0	2	0	2	3	2	0	5	12	20	0	32	9	4	19	0	32
2007	2	1	0	3	3	4	0	7	9	14	2	25	5	5	9	0	19
2008	1	2	0	3	1	5	0	6	8	38	0	46	4	10	23	0	37
2009	1	5	0	6	1 4	4	0	5 10	3	33 24	1	37	3	6 5	16 17	0	25
2010		3		3		5	1				0	28	4	3	17	0	26
B. F	Percen	tage D	istribu	ition o	f Rati	ngs by	Each	Regu	lator i	n Each	ı Year						
1993	14%	86%	0%		0%	86%	14%		19%	72%	9%		13%	0%	80%	7%	
1994	0%	100%	0%		8%	83%	8%		11%	81%	8%		24%	0%	74%	3%	
1995	14%	86%	0%		0%	90%	10%		27%	70%	3%		24%	0%	75%	1%	
1996	14%	86%	0%		33%	67%	0%		33%	66%	1%		35%	0%	64%	1%	
1997	25%	75%	0%		14%	71%	14%		30%	70%	0%		30%	7%	63%	0%	
1998	0%	100%	0%		33%	67%	0%		25%	75%	0%		25%	25%	51%	0%	
1999	50%	50%	0%		25%	75%	0%		14%	83%	3%		26%	19%	55%	0%	
2000	0%	100%	0%		0%	100%	0%		30%	70%	0%		20%	12%	68%	0%	
2001	0%	100%	0%		17%	83%	0%		16%	81%	3%		16%	37%	45%	3%	,
2002	0%	100%	0%		0%	100%	0%		17%	83%	0%		22%	27%	51%	0%	,
2003	0%	100%	0%		0%	100%	0%		17%	83%	0%		35%	30%	35%	0%	
2004	0%	100%	0%		29%	71%	0%		24%	76%	0%		27%	17%	57%	0%	.
2005	0%	100%	0%		50%	50%	0%		36%	62%	2%		17%	10%	73%	0%	
2006	0%	100%	0%		60%	40%	0%		38%	63%	0%		28%	13%	59%	0%	
2007	67%	33%	0%		43%	57%	0%		36%	56%	8%		26%	26%	47%	0%	
2008	33%	67%	0%		17%	83%	0%		17%	83%	0%		11%	27%	62%	0%	
2007	17%	83%	0%		20% 40%	80% 50%	0%		8%	89% 86%	3%		12%	24%	64%	0%	
2008	0%	100%	0%		40%	50%	10%		14%	86%	0%		15%	19%	65%	0%	

Notes: The rating of "High Sat" became available to Mass. regulators -- but not to federal regulators -- in mid-1997. No Massachusetts bank has received a rating of "Substantial NonCompliance" since 1992.

This table omits the Fed, which has given between 0 and 2 ratings per year; it gave two ratings in 2010, both 'Sat."

#### TABLE 4 YEAR OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS\* BY REGULATOR AND OVERALL, AS OF DECEMBER 31, 2010

	Banks*		Rated 2010		Last Rated in 2009		Last Rated in 2008		Last Rated in 2007		Last Rated in 2006		in Last ears^
Regulator	12/31/10	#	%	#	%	#	%	#	%	#	%	#	%
FED	9	2	22.2%	2	22.2%	2	22.2%	1	11.1%	1	11.1%	1	11.1%
OCC	16	4	25.0%	4	25.0%	2	12.5%	2	12.5%	0	0.0%	2	12.5%
OTS	20	10	50.0%	5	25.0%	4	20.0%	0	0.0%	0	0.0%	1	5.0%
FDIC	126	27	21.4%	36	28.6%	43	34.1%	7	5.6%	9	7.1%	3	2.4%
MASS	133	26	19.5%	25	18.8%	34	25.6%	9	6.8%	17	12.8%	22	16.5%
All Banks	169	50	29.6%	48	28.4%	47	27.8%	9	5.3%	10	5.9%	5	3.0%

\* This table excludes, for each regulator, banks that began doing business in Mass. within the last five years and have not yet received a CRA rating from that regulator: two banks for the OCC and two banks for the state.

#### TABLE 5

#### DISTRIBUTION OF CURRENT CRA RATINGS OF MASS. CREDIT UNIONS BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1992-2010

	Rated	Numbe	er of Curre	ent CRA F	Ratings	Distribution of Current CRA Ratings					
Year	CU's	OUT	HI SAT	SAT	NI	OUT	HI SAT	SAT	NI		
1992	27	0	NA	10	17	0.0%	NA	37.0%	63.0%		
1993	29	0	NA	14	15	0.0%	NA	48.3%	51.7%		
1994	84	1	NA	59	24	1.2%	NA	70.2%	28.6%		
1995	123	2	NA	98	23	1.6%	NA	79.7%	18.7%		
1996	123	3	NA	112	8	2.4%	NA	91.1%	6.5%		
1997	122	6	0	113	3	4.9%	0.0%	92.6%	2.5%		
1998	118	7	4	107	0	5.9%	3.4%	90.7%	0.0%		
1999	117	7	6	104	0	6.0%	5.1%	88.9%	0.0%		
2000	113	7	6	100	0	6.2%	5.3%	88.5%	0.0%		
2001	111	7	8	96	0	6.3%	7.2%	86.5%	0.0%		
2002	111	7	8	96	0	6.3%	7.2%	86.5%	0.0%		
2003	108	7	10	91	0	6.5%	9.3%	84.3%	0.0%		
2004	105	7	11	87	0	6.7%	10.5%	82.9%	0.0%		
2005	101	7	10	84	0	6.9%	9.9%	83.2%	0.0%		
2006	98	6	10	82	0	6.1%	10.2%	83.7%	0.0%		
2007	96	6	10	80	0	6.3%	10.4%	83.3%	0.0%		
2008	93	7	10	76	0	7.5%	10.8%	81.7%	0.0%		
2009	91	7	12	72	0	7.7%	13.2%	79.1%	0.0%		
2010	90	6	15	69	0	6.7%	16.7%	76.7%	0.0%		

#### TABLE 6

		Number o	of Ratings	Awardee	1	Distrib	oution of Ra	NA         75.0%           NA         29.2%           NA         81.8%           NA         70.8%           NA         70.8%           NA         70.8%           NA         70.8%           NA         70.8%           NA         92.3%           0.0%         94.0%           4.8%         92.1%           5.3%         92.1%           3.4%         82.8%           20.0%         76.0%           4.0%         96.0%           9.5%         71.4%           11.1%         88.9%           0.0%         100.0%           0.0%         84.6%           20.0%         70.0%				
Year	Total	OUT	HI SAT	SAT	NI	OUT	HI SAT	SAT	NI			
1991	4	0	NA	3	1	0.0%	NA	75.0%	25.0%			
1992	24	0	NA	7	17	0.0%	NA	29.2%	70.8%			
1993	11	0	NA	9	2	0.0%	NA	81.8%	18.2%			
1994	72	1	NA	51	20	1.4%	NA	70.8%	27.8%			
1995	62	3	NA	48	11	4.8%	NA	77.4%	17.7%			
1996	65	2	NA	60	3	3.1%	NA	92.3%	4.6%			
1997	50	3	0	47	0	6.0%	0.0%	94.0%	0.0%			
1998	63	2	3	58	0	3.2%	4.8%	92.1%	0.0%			
1999	38	1	2	35	0	2.6%	5.3%	92.1%	0.0%			
2000	29	4	1	24	0	13.8%	3.4%	82.8%	0.0%			
2001	25	1	5	19	0	4.0%	20.0%	76.0%	0.0%			
2002	25	0	1	24	0	0.0%	4.0%	96.0%	0.0%			
2003	21	4	2	15	0	19.0%	9.5%	71.4%	0.0%			
2004	18	0	2	16	0	0.0%	11.1%	88.9%	0.0%			
2005	10	0	0	10	0	0.0%	0.0%	100.0%	0.0%			
2006	13	2	0	11	0	15.4%	0.0%	84.6%	0.0%			
2007	10	1	2	7	0	10.0%	20.0%	70.0%	0.0%			
2008	29	2	3	24	0	6.9%	10.3%	82.8%	0.0%			
2009	16	1	3	12	0	6.3%	18.8%	75.0%	0.0%			
2010	10	0	5	5	0	0.0%	50.0%	50.0%	0.0%			

#### DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS DURING EACH YEAR, 1991-2010

One of the state's 91 state-chartered credit unions has a most recent rating based on an exam dated in 2000; two more have most recent exams dated in 2001; none in 2002; one in 2003; and two in 2004.

## TABLE 7 RATINGS OF LICENSED MORTGAGE LENDERS, 2009-2010

		1	Number of	Ratings			Percent of Ratings						
Year	Total	Out	HS	Sat	NI	SNC	Out	HS	Sat	NI	SNC		
2009*	6	0	0	5	0	1	0.0%	0.0%	83.3%	0.0%	16.7%		
2010^	14	0	1	12	1	0	0.0%	7.1%	85.7%	7.1%	0.0%		

\* 2009 was a partial year -- October to December only.

^ in 2010 the exams of three lenders led to consent orders rather than ratings .

Note: a list of individual lenders and their ratings, together with links to their performance evaluations, is available at: www.mass.gov/dob. Click on: "Loans & Mortgages," then "CRA for Mortgage Lenders."

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2010 (page 1 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
Abington Bank	Abington	yes	SAT	Nov-09	08/24/09	Fed	SAT	Jan-10	08/24/09
Adams Coop Bank	Adams	yes	OUT	Feb-04	10/08/03	FDIC	OUT	Dec-04	09/01/04
AtholSB	Athol	yes	HS	Apr-08	12/07/07	FDIC	SAT	Jun-08	12/07/07
Athol-Clinton Coop Bank	Athol	yes	HS	Apr-06	12/20/05	FDIC	SAT	Jul-09	03/02/09
AvidiaBank *	Hudson	yes	SAT	Aug-10	04/05/10	FDIC	SAT	Oct-10	04/05/10
Avon Coop Bank	Avon	yes	SAT	Sep-05	06/20/05	FDIC	SAT	May-08	01/30/08
Bank of America#	Charlotte NC	no				OCC	OUT	Oct-10	03/31/09
Bank of Canton(was Canton IfS)	Canton	yes	HS	Sep-06	04/10/06	FDIC	SAT	Mar-08	09/13/07
Bank of CapeCod (new 9/06)	Hyannis	yes	none	na	na	FDIC	SAT	Dec-08	05/28/08
Bank of Easton <sup>™</sup>	North Easton	yes	SAT	Dec-06	10/02/06	Fed	SAT	Feb-03	09/30/02
BankFive	FallRiver	yes	OUT	May-09	01/26/09	FDIC	OUT	Jul-09	01/26/09
BarreSB	Barre	yes	SAT	May-08	03/12/08	FDIC	SAT	Jul-08	03/12/08
Bay State SB	Worcester	yes	HS	May-08	02/08/08	FDIC	SAT	Jul-08	02/08/08
BelmontSB	Belmont	yes	SAT	Aug-08	10/03/07	FDIC	SAT	Oct-08	10/03/07
BerkshireBank	Pittsfield	yes	HS	Dec-09	02/02/09	FDIC	SAT	Jan-10	02/02/09
Beverly Coop Bank	Beverly	yes	SAT	Jan-06	09/27/05	FDIC	SAT	May-09	09/16/08
BNY Mellon, NA*	Pittsburgh PA	no				OCC	OUT	Dec-07	03/31/07
Boston Private B&T	Boston	yes	OUT	Apr-05	01/10/05	FDIC	OUT	Aug-08	02/05/08
BraintreeCoop Bank	Braintree	yes	SAT	Sep-10	05/24/10	FDIC	SAT	Nov-08	06/23/08
Bridgewater SB	Bridgewater	yes	SAT	Jan-05	11/03/04	FDIC	SAT	Mar-08	11/08/07
BristolCounty SB	Taunton	yes	OUT	Jul-10	10/19/09	FDIC	OUT	Sep-10	10/19/09
Brookline Bank	Brookline	no				OTS	SAT	May-09	11/03/08
CambridgeSB	Cambridge	yes	HS	Jun-08	08/20/07	FDIC	SAT	Aug-08	08/20/07
CambridgeTrustCo	Cambridge	yes	SAT	May-08	12/07/07	FDIC	SAT	Jul-08	12/07/07
Canton Coop Bank	Canton	yes	SAT	Jun-06	03/27/06	FDIC	SAT	Aug-06	03/27/06
Cape Ann SB	Glouscester	yes	HS	Jul-09	03/23/09	FDIC	SAT	Sep-09	03/23/09
CapeCod Coop Bank	Yarmouth Port	yes	HS	Apr-08	11/20/07	FDIC	SAT	Jun-08	11/20/07
CapeCod FiveCents SB	Harwich Port	yes	OUT	Oct-07	06/11/07	FDIC	OUT	Dec-07	06/11/07
Central Coop Bank Century B&T	Somerville	yes	HS	Jul-07	05/03/07 11/21/07	FDIC	SAT	Sep-07	05/03/07
Charles River Bank *	Somerville	yes	SAT	Jul-08		FDIC	SAT	Sep-08	11/21/07
Chelsea-ProvidentCoop Bk ^^	Medway Chelsea	yes	SAT HS	Jul-08 Feb-10	03/31/08 11/30/09	Fed Fed	SAT SAT	Aug-08 Mar-10	03/31/08 11/30/09
ChicopeesB	Chicopæ	yes	OUT	Dec-06	10/03/06	FDIC	OUT	Feb-07	10/03/06
CitiBank (in MA fall 2006) #	New York	yes no	001	Da -00	10/03/00	OCC	none	na	na
Citizens Union SB	FallRiver	yes	HS	Aug-06	05/22/06	FDIC	OUT	Jan-08	08/13/07
Clinton SB	Clinton	yes	SAT	Nov-10	02/01/10	FDIC	SAT	May-07	01/22/07
Colonial Coop Bank	Gardner	yes	HS	Jul-07	03/12/07	FDIC	SAT	Mar-10	09/10/09
Colonial FSB	Quincy	no	115	541 07	05/12/07	OTS	SAT	Apr-10	12/15/09
CommerceB&T	Worcester	yes	SAT	Jul-08	12/04/06	FDIC	SAT	Aug-08	12/13/09
Common wealth Coop Bank *	Boston	yes	SAT	Jan-08	10/29/07	OTS	SAT	Jul-08	04/10/08
Commonweath NB	Worcester	no			10,2001	OCC	SAT	Nov-04	07/12/04
Community Bank	Brockton	yes	SAT	Apr-04	10/30/03	FDIC	SAT	Nov-10	12/01/09
CooperativeBank, The	Boston	yes	SAT	Aug-10	03/08/10	FDIC	SAT	Oct-10	03/08/10
Country BfS	Ware	yes	SAT	Dec-09	07/27/09	FDIC	SAT	Feb-10	07/27/09
Danversbank	Danvers	yes	HS	Mar-09	07/14/08	FDIC	SAT	May-09	07/14/08
Darra Soan	Darvas	yus	110	19101-07	07/14/00	IDIC	571	1viay-09	07/14/00

## TABLE A-1CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2010 (page 2 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
Dean Coop Bank	Franklin	yes	OUT	May-04	01/26/04	FDIC	OUT	Apr-06	12/14/05
DedhamInstfor Savings	Dedham	yes	SAT	Jun-08	03/10/08	FDIC	SAT	Aug-08	03/10/08
EagleBank	Everett	yes	HS	Oct-09	04/20/09	FDIC	SAT	Dec-09	04/20/09
East Boston SB	Boston	yes	HS	Dec-09	01/26/09	FDIC	SAT	Feb-10	01/20/09
EastCambridgeSB	Cambridge	yes	SAT	Oct-10	06/01/10	FDIC	SAT	Dec-10	06/01/10
Eastern Bank	Boston	yes	OUT	Jul-08	06/25/07	FDIC	OUT	Sep-08	06/25/07
Easthampton SB	Easthampton	yes	SAT	Nov-08	07/30/08	FDIC	SAT	Jan-09	07/30/08
Economy Coop Bank	Merrimac	yes	SAT	Dec-08	10/14/08	FDIC	SAT	Feb-09	10/14/08
Edgartown NB	Edgartown	no				OCC	SAT	Apr-09	12/09/08
Enterprise B&T	Lowell	yes	OUT	Nov-01	07/16/01	FDIC	SAT	May-08	10/21/07
Equitable Coop Bank	Lynn	yes	SAT	Dec-10	08/16/10	FDIC	SAT	Sep-08	04/28/08
Everett Coop Bank	Everett	yes	OUT	Jun-05	03/21/05	FDIC	SAT	Jan-10	08/03/09
Family Federal Savings	Fitchburg	no				OTS	SAT	Sep-08	06/18/08
FamilyFirstBank *	Ware	yes	SAT	Jan-09	09/19/08	FDIC	SAT	Jun-06	02/21/06
Fidelity Coop Bank	Fitchburg	yes	SAT	May-10	02/01/10	FDIC	SAT	Aug-10	02/01/10
FirstCommons Bank [new 7/09]	Newton	no				OCC	none	na	na
FirstFSB of Boston	Boston	no				OTS	OUT	May-10	02/08/10
FirstNB of Ipswich	Ipswich	no				OCC	SAT	Aug-08	06/02/08
FirstTradeUnion SB	Boston	no	<b></b>		10000	OTS	NI	May-10	12/28/09
Florence SB	Florence	yes	OUT	Mar-07	10/30/06	FDIC	OUT	Sep-08	04/18/08
Foxboro Federal S&L	Foxboro	no	0.4 <b>m</b>	1100	00/10/00	OTS	SAT	Sep-08	07/07/08
Framingham Coop Bank	Framingham	yes	SAT	Jul-09	02/12/09	FDIC	SAT	Sep-09	02/12/09
Georgetown SB	Georgetown	no	110	1 05	00/12/04	OTS	SAT	Apr-10	01/25/10
BankGlouc ester* Granite SB	Gloucester	yes	HS SAT	Jan-05	09/13/04	FDIC FDIC	SAT SAT	Mar-09 Dec-09	10/17/07 06/09/09
	Rockport Grænfield	yes	HS	Sep-06 Sep-04	05/14/04	FDIC	OUT	Mar-06	11/07/05
Greenfield Coop Bank Greenfield SB	Greenfield	yes	OUT	Sep-04 Sep-08	02/19/08	FDIC	OUT	Nov-08	02/19/08
Hampden Bank	Springfield	yes yes	HS	Aug-08	05/06/08	FDIC	OUT	Oct-08	05/06/08
Haverhill Coop Bank	Haverhill	yes	SAT	Oct-09	06/01/09	FDIC	SAT	Dec-09	06/01/09
Hingham Inst for Savings	Hingham	yes	SAT	Mar-09	12/08/08	FDIC	SAT	May-09	12/08/08
Holbrook Coop Bank	Holbrook	yes	SAT	May-06	02/21/06	FDIC	SAT	Jul-09	02/24/09
Hometown Bank	Webster	yes	SAT	Jul-06	05/02/06	FDIC	SAT	Feb-10	03/16/10
Hoosac Bank	North Adams	yes	SAT	Dec-08	08/04/08	FDIC	SAT	Feb-09	08/04/08
HydePark SB	Boston	yes	SAT	Nov-09	06/22/09	FDIC	SAT	Jan-10	06/22/09
Instfor Savings	Newburyport	yes	SAT	Sep-08	03/31/08	FDIC	SAT	Nov-08	03/31/08
Leader Bank, NA	Arlington	no		1		OCC	SAT	Jun-10	03/16/10
LæBank	Læ	yes	SAT	May-08	03/17/08	FDIC	SAT	Jul-08	03/17/08
Legac y Banks	Pittsfield	yes	HS	Jul-10	06/22/09	FDIC	SAT	Aug-10	06/15/09
Lenox NB	Lenox	no				OCC	SAT	Mar-08	01/07/08
Lowell Coop Bank	Lowell	yes	SAT	Jun-05	02/14/05	FDIC	SAT	Jul-06	04/05/06
Lowell Five Cents SB	Lowell	yes	HS	Nov-08	05/19/08	FDIC	SAT	Jan-09	05/19/08
Mansfield Coop Bank	Mansfield	yes	SAT	Oct-06	06/12/06	FDIC	SAT	Feb-10	04/13/09
Marblehead SB	Marblehead	yes	OUT	Apr-09	02/17/09	Fed	OUT	May-09	02/17/09
Marlborough SB	Marlborough	yes	HS	Mar-10	11/02/09	FDIC	SAT	May-10	11/02/09
Martha's Vineyard SB *	Edgartown	yes	OUT	Sep-10	04/30/10	FDIC	OUT	Oct-10	04/30/10

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2010 (page 3 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
Mayflower Coop Bank	Middleborough	yes	OUT	May-09	03/09/09	FDIC	OUT	Jul-09	03/09/09
Mechanics Coop Bank	Taunton	yes	OUT	Sep-02	06/24/02	FDIC	OUT	Aug-07	02/28/07
Mætinghouse Coop Bank	Boston	yes	SAT	Aug-05	05/13/05	FDIC	SAT	Jun-09	01/05/09
MelroseCoop Bank	Melrose	yes	SAT	Apr-09	01/22/09	FDIC	SAT	Jun-09	01/22/09
Mercantile B&T	Boston	yes	SAT	Jun-04	02/26/04	Fed	OUT	May-06	02/21/06
Merrimac SB	Merrimac	yes	SAT	Nov-10	07/06/10	FDIC	SAT	May-08	12/03/07
Methuen Coop Bank	Methuen	yes	SAT	Apr-07	12/28/06	FDIC	SAT	Oct-08	06/30/08
Middlesex Fed Savings, FA	Somerville	no				OTS	SAT	Aug-09	03/09/09
Middlesex SB	Natic k	yes	OUT	Aug-10	11/30/09	FDIC	OUT	Oct-10	11/30/09
Milford Federal S&L	Milford	no				OTS	SAT	Dec-09	10/05/09
Milford NB	Milford	no				OCC	SAT	May-10	01/25/10
Millbury NB	Millbury	no				OCC	SAT	Jul-09	03/04/09
Millbury SB	Millbury	yes	SAT	Sep-10	06/07/10	FDIC	SAT	Apr-08	11/08/07
Monson SB	Monson	yes	SAT	May-05	03/07/05	FDIC	SAT	Aug-08	03/31/08
Mutual FSB of Plymouth Co	Whitman	no				OTS	SAT	Mar-10	11/23/09
Natic k FSB	Natic k	no				OTS	SAT	Sep-09	06/22/09
National Grand Bank	Marblehead	no				OCC	SAT	Jan-10	08/24/09
NeedhamBank	Needham	yes	SAT	Jan-09	10/20/08	Fed	SAT	Feb-09	10/20/08
NewAllianceBank #	New Haven	na	~			FDIC	SAT	Oct-09	12/08/08
NewburyportFiveCents SB	Newburyport	yes	SAT	Jul-09	01/20/09	FDIC	SAT	Sep-09	01/20/09
North Brookfield SB	No.Brookfield	yes	SAT	Nov-10	06/30/10	FDIC	OUT	Sep-04	04/27/04
North CambridgeCoop Bank	Cambridge	yes	SAT	Apr-10	01/11/10	FDIC	SAT	Jun-10	01/11/10
North Easton SB	North Easton	yes	SAT	Apr-08	12/17/07	FDIC	SAT	May-08	12/17/07
North Middlesex SB	Ayer	yes	HS	Oct-08	01/16/08	FDIC	SAT	Dec-08	01/16/08
North Shore Bank	Peabody	yes	SAT	Jun-10	02/26/10	FDIC	SAT	Aug-10	02/16/10
Northampton Coop Bank <sup>^^</sup> Northern B&T	Northampton Woburn	yes	SAT SAT	Sep-08	05/19/08 09/14/07	Fed FDIC	SAT SAT	Sep-08 Mor 08	05/19/08 09/14/07
Northmark Bank	N. Andover	yes	SAT	Dec-07 Jun-09	03/18/09	FDIC	SAT	Mar-08 Aug-09	03/18/09
Norwood Coop Bank	Norwood	yes yes	SAT	Sep-10	05/17/10	FDIC	SAT	Nov-10	05/17/10
Nuvo B&T [new April 2008]	Springfield	yes	SAT	Aug-10	04/26/10	FDIC	SAT	Oct-10	04/26/10
OneUnited Bank	Boston	yes	SAT	Oct-07	04/03/07	FDIC	SAT	Nov-07	04/03/07
PatriotCommunity Bank (new'06)	Woburn	yes	none	na	na	FDIC	SAT	Aug-08	03/31/08
PentucketBank	Haverhill	yes	HS	Oct-09	03/23/09	FDIC	SAT	Dec-09	03/23/09
Peoples Bank	Holyoke	yes	OUT	Nov-08	06/25/08	FDIC	SAT	Jan-09	06/25/08
Peoples Federal SB	Boston	no				OTS	OUT	Sep-08	06/16/08
People's United Bank#	BridgeportCT	no				OTS	OUT	Sep-10	10/05/09
PilgrimBank	Cohasset	yes	SAT	Aug-04	05/17/04	FDIC	SAT	Apr-05	01/11/05
Pittsfield Coop Bank	Pittsfield	yes	HS	Dec-08	09/17/08	FDIC	SAT	Feb-09	09/17/08
ProvidentBank	Amesbury	yes	SAT	Sep-10	05/10/10	FDIC	SAT	Nov-10	05/10/10
Randolph SB	Randolph	yes	SAT	Jun-08	07/17/07	FDIC	SAT	Aug-08	07/17/07
RBS Citizens Bank, NA* # ^^	ProvidenceRI	no				OCC	OUT	Feb-04	12/02/02
Reading Coop Bank	Reading	yes	SAT	Nov-04	07/28/04	FDIC	SAT	Oct-06	06/12/06
Rockland TrustCo	Rockland	yes	OUT	Jan-04	08/25/03	FDIC	OUT	Mar-08	10/01/07
RockportNB	Rockport	no				OCC	SAT	Jul-09	04/06/09
RollstoneB&T *	Fitchburg	no				OTS	OUT	Dec-10	04/19/10

## TABLE A-1CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2010 (page 4 of 4)

		Mass	Mass	Mass	Mass	Fed	Fed	Fed	Fed
Bank	City/Town	Reg?	Rating	List	ExamDate	Reg	Rating	List	ExamDate
Salem Five Cents SB	Salem	yes	HS	Jul-10	03/08/10	FDIC	SAT	Sep-10	03/08/10
Saugus Bank	Saugus	yes	SAT	Aug-04	04/13/04	FDIC	SAT	Nov-06	07/10/06
Savers Coop Bank	Southbridge	yes	HS	Dec-07	07/30/07	FDIC	SAT	Feb-08	07/30/07
Savings Bank, The	Wakefield	yes	SAT	May-10	07/20/09	FDIC	SAT	Jul-10	07/20/09
Scituate FSB	Scituate	no				OTS	OUT	Jun-04	03/29/04
Seamen's Bank	Provincetown	yes	HS	Dec-08	09/15/08	FDIC	SAT	Jan-09	09/15/08
South Adams SB	Adams	yes	SAT	Mar-09	12/08/08	FDIC	SAT	May-09	12/08/08
South Coastal Bank	Rockland	yes	SAT	Sep-06	07/17/06	FDIC	SAT	Nov-06	07/17/06
S-Bank	Weymouth	yes	SAT	Sep-06	04/18/06	FDIC	SAT	Aug-06	04/24/06
South Shore SB	Weymouth	yes	HS	Mar-10	08/10/09	FDIC	SAT	May-10	08/10/09
SouthbridgeSB	Southbridge	yes	OUT	Jun-06	03/27/06	FDIC	SAT	Jul-08	03/17/08
Sovereign Bank #	Pennsylvania	no				OTS	OUT	Jun-09	04/21/08
Spencer SB	Spencer	yes	HS	Sep-08	05/05/08	FDIC	SAT	Nov-08	05/05/08
State Street B& T	Boston	yes	OUT	Jul-07	04/09/07	Fed	OUT	Jul-07	04/09/07
StonehamSB	Stoneham	yes	SAT	May-09	01/12/09	FDIC	SAT	Jul-09	01/12/09
StonehamBank	Stoneham	yes	SAT	Oct-09	05/26/09	FDIC	SAT	Dec-09	05/26/09
Stoughton Coop Bank	Stoughton	yes	SAT	Feb-06	12/12/05	FDIC	SAT	Oct-07	04/26/07
TDBank#	Wilmington DE	no				OCC	OUT	??	12/08/08
UniBank for Savings	Whitinsville	yes	OUT	Aug-05	04/11/05	FDIC	SAT	Nov-08	06/23/08
United Bank	W.Springfield	no				OTS	SAT	Jan-10	10/13/09
VillageBank	Newton	yes	SAT	Mar-09	10/15/08	FDIC	SAT	May-09	10/15/08
WainwrightB&T	Boston	yes	OUT	Nov-08	05/05/08	FDIC	OUT	Jan-09	05/05/08
Wakefield Coop Bank	Wakefield	yes	SAT	Aug-09	06/09/09	FDIC	SAT	Sep-09	06/09/09
WalpoleCoop Bank	Walpole	yes	SAT	Oct-08	07/28/08	FDIC	SAT	Dec-08	07/28/08
Washington SB	Lowell	yes	HS	Jun-05	03/07/05	FDIC	SAT	Jun-08	02/19/08
Watertown SB	Watertown	yes	OUT	Oct-06	08/07/06	FDIC	SAT	Jun-09	12/03/08
Webster Bank, NA#	Waterbury CT	no				OCC	SAT	Jun-07	05/01/06
Webster Five Cents SB	Webster	yes	OUT	Aug-10	12/02/09	FDIC	OUT	Oct-10	12/21/09
Wellesley Bank	Wellesley	yes	SAT	Mar-06	11/28/05	FDIC	SAT	Feb-09	09/02/08
Westfield FSB ^^	Westfield	no				OTS	SAT	Oct-10	04/05/10
Weymouth Bank	Weymouth	yes	SAT	May-10	01/25/10	FDIC	SAT	Jul-10	01/25/10
Williamstown SB	Williamstown	yes	SAT	Dec-08	08/04/08	FDIC	SAT	Feb-09	08/04/08
Winchester Coop Bank	Winchester	yes	SAT	Jun-08	02/14/08	FDIC	SAT	Sep-08	02/14/08
Winchester SB	Winchester	yes	SAT	Aug-08	04/08/08	FDIC	SAT	Oct-08	04/08/08
Winter Hill Federal S&L	Somerville	no				OTS	OUT	Dec-10	06/08/10
WrenthamCoop Bank	Wrentham	yes	SAT	Dec-05	09/12/05	FDIC	SAT	Jan-09	09/29/08

\* indicates banks with potentially confusing recent name changes within the last five years:

Avidia Bank was Hudson Savings Bank; BankGloucester was Gloucester Coop Bank; BNY Mellon NA acquired Mellon Trustof New England; Charles River Bank was Medway Coop Bank; Commonwealth Coop Bank was Hyde Park Coop; Family First Bank was WareCoop Bank; Martha' Vineyard SB was Duke's County SB; RBS Citizens absorbed Citizens Bank (it still does business in Mass as Citizens Bank); Rollstone B&T was Fitchburg SB;S-Bank was South ShoreCooperativeBank

# indicates eight banks that are headquartered outside of Massachusetts (CRA ratings shown are for performance within Mass.) See Table A-2 and its notes for more detailed info on all banks with branches both inside and outside of Mass.

<sup>^</sup>indicates banks that have changed charters and have CRA ratings from former regulators

Bank of Easton became a state member bank of Fed in Sept04; rating shown is from FDIC.

RBS Citizens Bank (anational bank) absorbed Citizens Bank of Mass. on 9/1/07; federal rating shown is from the FDIC.

# TABLE A-2 BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS (Data as of June 30, 2010; adjusted for mergers through Dec. 31, 2010)

		Branches			Deposits (\$ millions)			
Bank Name	Headquarters	Mass.	Other	Mass. %	Mass.	Other	Mass. %	
A. Banks with Massachusetts	He adquarte rs							
Berkshire Bank	Pittsfield	18	24	42.9%	1,450	614	70.3%	
Bristol County SB	Tauton	12	1	92.3%	875	43	95.3%	
Citizens-Union SB	Fall River	8	1	88.9%	512	32	94.1%	
Enterprise B&T	Lowell	16	2	88.9%	1,136	79	93.5%	
First Trade Union Bank, FSB	Boston	3	3	50.0%	439	37	92.29	
Legacy Banks	Pittsfield	13	7	65.0%	564	112	83.49	
Merrimac SB	Merrimac	1	1	50.0%	37	21	63.89	
Milford Federal S&L	Milford	3	1	75.0%	262	43	85.9%	
OneUnited Bank	Boston	3	7	30.0%	34	239	12.5%	
Pentucket Bank	Haverhill	3	2	60.0%	436	105	80.6%	
Provident Bank	Amesbury	3	4	42.9%	278	123	69.3%	
Randolph SB	Randolph	5	2	71.4%	269	52	83.89	
Total, 12 Banks		88	55	61.5%	6,292	1,500	80.79	
Bank of America, NA^	Charlotte NC	285	5,752	4.7%	45,597	783,331	5.5%	
Bank of America NAA	Charlotte NC	285	5752	4 7%	45 597	783 331	5 59	
Bank of New England	Salem NH	3	6	33.3%	122	321	27.5%	
Bank of New York Mellon	New York NY	1	2	33.3%	6,616	61,093	9.8%	
Beacon Federal	E. Syracuse NY	1	7	12.5%	64	641	9.19	
Beal Bank, SSB	Plano, TX	1	33	2.9%	531	2,553	17.29	
BNY Mellon, NY^	Pittsburgh PA	1	19	5.0%	2,421	6,098	28.49	
Cathay Bank	Los Angeles CA	1	48	2.0%	67	7,091	0.99	
CitiBank, NA^	New York NY	31	1,015	3.0%	1,342	253,193	0.59	
Domestic Bank	Cranston RI	2	7	22.2%	22	201	9.9%	
East West Bank	Pasadena CA	3	131	2.2%	242	14,211	1.79	
Millenium BCP Bank, NA	Newark NJ	4	13	23.5%	81	552	12.89	
Monadnock Community Bank	Peterborough NH	1	1	50.0%	4	55	6.89	
			1	50.070	•		0.07	
NewAlliance Bank^	New Haven CT	13	76	14.6%	380	4,891		
NewAlliance Bank^ Northeast Community Bank	New Haven CT White Plains NY					4,891 259	7.29	
		13	76	14.6%	380		7.29	
Northeast Community Bank	White Plains NY	13 2	76 6	14.6% 25.0%	380 113	259	7.29 30.49 2.59 51.99	
Northeast Community Bank Northern Trust Bank, FSB	White Plains NY Bloomfield Hills MI	13 2 1	76 6 12	14.6% 25.0% 7.7%	380 113 26	259 1,009	7.29 30.49 2.59	
Northeast Community Bank Northern Trust Bank, FSB People's United Bank <sup>A</sup>	White Plains NY Bloomfield Hills MI Bridgeport CT	13 2 1 29	76 6 12 277	14.6% 25.0% 7.7% 9.5%	380 113 26 1,597	259 1,009 1,479	7.29 30.49 2.59 51.99	
Northeast Community Bank Northern Trust Bank, FSB People's United Bank^ RBS Citizens NA^	White Plains NY Bloomfield Hills MI Bridgeport CT Providence RI	13 2 1 29 256	76 6 12 277 870	14.6% 25.0% 7.7% 9.5% 22.7%	380 113 26 1,597 24,494	259 1,009 1,479 46,791	7.29 30.49 2.59 51.99 34.49 5.59	
Northeast Community Bank Northern Trust Bank, FSB People's United Bank^ RBS Citizens NA^ Salem Coop Bank	White Plains NY Bloomfield Hills MI Bridgeport CT Providence RI Salem NH	13 2 1 29 256 1	76 6 12 277 870 1	14.6% 25.0% 7.7% 9.5% 22.7% 50.0%	380 113 26 1,597 24,494 12	259 1,009 1,479 46,791 207	7.29 30.49 2.59 51.99 34.49 5.59 6.39	
Northeast Community Bank Northern Trust Bank, FSB People's United Bank^ RBS Citizens NA^ <i>Salem Coop Bank</i> Salisbury B&T	White Plains NY Bloomfield Hills MI Bridgeport CT Providence RI <i>Salem NH</i> Lakeville CT	13 2 1 29 256 1 2	76 6 12 277 870 1 6	14.6% 25.0% 7.7% 9.5% 22.7% 50.0% 25.0%	380 113 26 1,597 24,494 12 27	259 1,009 1,479 46,791 207 405	7.29 30.49 2.59 51.99 34.49 5.59 6.39 32.79	
Northeast Community Bank Northern Trust Bank, FSB People's United Bank^ RBS Citizens NA^ Salem Coop Bank Salisbury B&T Sovereign Bank^	White Plains NY Bloomfield Hills MI Bridgeport CT Providence RI <i>Salem NH</i> Lakeville CT Wyomissing PA^	13 2 1 29 256 1 229	76 6 12 277 870 1 6 490	14.6% 25.0% 7.7% 9.5% 22.7% 50.0% 25.0% 31.8%	380 113 26 1,597 24,494 <i>12</i> 27 13,623	259 1,009 1,479 46,791 207 405 28,039	7.29 30.49 2.59 51.99 34.49 5.59 6.39 32.79 7.29	
Northeast Community Bank Northem Trust Bank, FSB People's United Bank^ RBS Citizens NA^ Salem Coop Bank Salisbury B&T Sovereign Bank^ TD Bank, NA^	White Plains NY Bloomfield Hills MI Bridgeport CT Providence RI <i>Salem NH</i> Lakeville CT Wyomissing PA^ Wilmington DE^	13 2 1 29 256 1 229 229 157	76 6 12 277 870 1 6 490 962	14.6% 25.0% 7.7% 9.5% 22.7% 50.0% 25.0% 31.8% 14.0%	380 113 26 1,597 24,494 12 27 13,623 8,716	259 1,009 1,479 46,791 207 405 28,039 113,078	7.29 30.49 2.59 51.99 34.49	

Source: FDIC, Summary of Deposits data, as of June 30,2010 (www.fdic.gov). Merger adjustment: River Bank's branches and deposits assigned to People's United.

^ This report classifies these eight banks as "Massachusetts banks"; see second paragraph of report and footnote to Table A-1.

Also: This table ignores trust or investment banks with only branches that have no or minimal deposits. Banks shown in *italics* were not on in this table last year.

#### TABLE A-3

#### CURRENT RATINGS OF MASSACHUSETTS STATE-CHARTERED CREDIT UNIONS, YEAR-END 2009

Credit Union Name	City/Town	Rating	ExamDate
A ldenville CU	Chicopee	SAT	10/31/07
AlkomCU	Worcester	SAT	07/01/08
Alpha CU	Boston	HS	04/14/08
A tholCredit Union	Athol	SAT	05/04/09
Billerica MuniEmpls CU	Billerica	SAT	12/08/09
Boston Firefighters CU	Boston	SAT	12/29/08
Bridgewater CU	Bridgewater	SAT	08/19/08
Brockton PostalEmpls CU	Brockton	SAT	08/21/06
Brookline MunicipalCU	Brookline	SAT	10/23/06
Brotherhood CU	Lynn	SAT	08/25/05
Cabot Boston CU	Boston	SAT	10/01/08
Cambridge Portuguese CU	Cambridge	HS	12/08/08
Chicopee Muni Empls CU	Chicopee	SAT	05/05/08
City of Boston CU	Boston	SAT	10/24/05
Comm Utils Empl's CU	Marion	SAT	10/05/07
Community CU of Lynn	Lynn	HS	08/20/07
Credit U of the Berkshires	Pittsfield	SAT	05/13/08
Crescent CU	Brockton	HS	09/28/09
Energy CU	Waltham	SAT	11/17/08
Everett CU	Everett	SAT	06/07/00
FallRiver MuniEmplys CU	FallRiver	SAT	01/12/09
FenwalCU	Ashland	SAT	08/28/06
First Choice CU	Lawrence	HS	04/27/09
First Priority CU	Boston	HS	06/04/01
FreedomCU	Springfield	SAT	12/04/08
Gloucester Fire Dept CU	Gloucester	OUT	01/04/06
Gloucester MuniCU	Gloucester	SAT	07/09/08
Grafton Suburban CU	Grafton	SAT	10/14/08
Greater Springfield CU	Springfield	SAT	04/15/09
HarborOne CU	Brockton	OUT	08/25/08
Harvard U Empls CU	Cambridge	SAT	09/08/08
HaverhillCU	Haverhill	SAT	11/13/06
Haverhill Fire Dept CU	Haverhill	OUT	10/10/06
Holyoke CU	Holyoke	HS	09/15/09
Holyoke PostalCU	Holyoke	SAT	07/15/08
HTM CU	Haverhill	SAT	06/10/08
IndustrialCU	Boston	SAT	02/10/09
Jeanne D'Arc CU	Lowell	OUT	10/20/08
Landmark CU	North A dams	SAT	11/14/07
Lawrence PostalEmpls CU	Lawrence	SAT	05/01/08
Leominster CU	Leominster	OUT	08/06/07
Liberty Bay CU	Boston	SAT	02/05/07
LowellFirefighters CU	Lowell	SAT	02/01/10
Lus o-American CU	Peabody	SAT	09/06/05
Lynn MuniEmpls CU	Lynn	SAT	06/03/08

Credit Union Name	City/Town	Rating	ExamDate
Lynn Police CU	Lynn	SAT	09/08/09
Lynn Teachers CU	Lynn	SAT	09/13/10
Malden City Empls CU	Malden	SAT	05/01/08
Mass Bay CU	Boston	SAT	01/14/04
Mass Postal Empls CU	Lynn	HS	12/21/09
Mass State Empls CU	Boston	SAT	08/15/05
Members Plus CU	Boston	SAT	12/10/03
Metro CU	Chelsea	HS	09/21/09
New Bedford CU	New Bedford	SAT	06/09/08
Newton MunicipalCU	Newton	SAT	04/22/08
Newton Teachers CU	Newton	SAT	10/22/07
Northern Mass Tel Wrkrs CU	Lowell	HS	02/11/08
One Twenty CU	Boston	SAT	01/11/01
Polis h National CU	ChicopeeFalls	SAT	10/16/08
Premier Source CU	Springfield	SAT	06/15/05
Pressers Union Local 12 CU	Boston	SAT	06/21/06
Quincy CU	Quincy	SAT	05/05/09
Revere Firefighters CU	Revere	SAT	05/05/08
River Works CU	Lynn	SAT	06/09/08
Salem Italian A mer CU	Salem	SAT	10/16/07
Savage Arms CU	Westfield	SAT	07/16/08
Seaport CU	Salem	SAT	12/28/09
Secure CU	Melrose	SAT	12/20/05
Sharon CU	Sharon	SAT	05/26/09
Southbridge CU	Southbridge	HS	03/26/07
Southern Mass CU	Fairhaven	SAT	09/17/07
Springfield Street RR Empls CU	Springfield	SAT	09/26/06
St.Anne CU	New Bedford	HS	02/17/04
St. Anne's CU	FallRiver	SAT	11/03/08
St. Jean's CU	Lynn	HS	08/23/10
St. Mary's CU	Marlborough	HS	08/23/10
St. Vincent Hosp CU	Worcester	SAT	04/17/08
STCU	Springfield	SAT	01/20/09
Sturdy CU	Attleboro	SAT	06/09/08
Tremont CU	Boston	SAT	05/25/05
University CU	Boston	SAT	04/05/06
Valleystone CU	Wilbraham	SAT	04/30/08
WalthamMuniEmpls CU	Waltham	SAT	08/16/07
Watertown MunicipalCU	Watertown	SAT	08/07/07
Wemeko CU	W.Springfield	SAT	03/30/09
Worcester CU	Worcester	SAT	11/17/08
Worcester Fire Dept CU	Worcester	HS	04/15/08
Worcester Police CU	Worcester	SAT	04/23/08
Worcester PostalCU	Worcester	SAT	12/04/06
Workers' CU	Fitchburg	OUT	02/05/07

Of the 90 current state-chartered credit unions, 69 have a current rating of SA Tis factory. The six current **are indicated in bold.** The fifteen current *High Satisfactory (HS) ratings are indicated in italics.* 

OUTs tanding ratings

#### TABLE A-4

### PERFORMANCE RATINGS OF LICENSED MORTGAGE LENDERS UNDER THE MORTGAGE LENDER COMMUNITY INVESTMENT REGULATION (CRA FOR MORTGAGE LENDERS)

2009-2010

					2009 Rank
Lender	Headquarters	Rating	List Date	Exam Date	Among LMLs^
Advanced Mortgage Services	Norwell MA	SAT	Mar-10	12/01/09	24
American Internet Mortgage	San Diego CA	SAT	Jul-10	08/31/09	50
Amerisave Mortage Corp.	Atlanta GA	NA*	NA*	01/27/10	33
Embrace Home Loans	Newport RI	SAT	May-10	02/02/10	41
Franklin American Mortgage Co	Franklin TN	SAT	Nov-10	06/09/10	10
Freedom Mortgage Corp.	Mt. Laurel NJ	SAT	May-10	12/11/09	23
Greenpark Mortgage Corp.	Needham MA	SAT	Dec-10	06/20/10	6
Metro Boston Mortgage Co.	Canton MA	SAT	Nov-10	04/20/10	21
Monument Mortgage Co.	Lexington MA	SAT	Oct-09	04/21/09	54
Mortgage Network	Danvers MA	NA*	NA*	08/25/09	7
Mortgage Partners	Amherst NH	SAT	Sep-10	4//20/10	40
MSA Mortgage	Winthrop MA	SAT	Dec-09	06/30/09	13
NE Moves Mortgage	Waltham MA	SAT	Jan-10	07/29/09	4
Omega Mortgage Corp.	Sudbury MA	SAT	Sep-10	05/10/10	88
Plaza Home Mortgage	San Diego CA	NI	Sep-10	05/10/10	25
Primary Residential Mortgage	Salt Lake City UT	NA*	NA*	10/16/09	35
Pulte Mortgage	Englewood CA	SAT	Aug-10	03/02/10	67
Radius Financial Group	Norwell MA	SAT	Nov-09	06/30/09	22
Ross Mortgage Co.	Westborough MA	SAT	Oct-09	04/29/09	28
Shamrock Financial Corp.	East Providence RI	SAT	Nov-09	06/22/09	43
Sierra Pacific Mortgage Co.	Folsom CA	SAT	Aug-10	02/15/10	18
Suntrust Mortgage	Richmond VA	HS	Sep-10	03/11/10	11
Union Capital Mortgage#	Randolph MA	SNC	Dec-09	04/15/09	#

^ Lenders are ranked by total number of Massachusetts loans reported in 2009 HMDA data. In that year, 188 lenders reported one or more loans, with 81 of these reporting fifty or more loans.

NA\*: Three exams resulted in not in ratings but in Consent Orders that required these lenders to rectify "substantial noncompliance with aplicatobe federal and state statutes, rules, and regulations," including incomplete loan records and inaccurate HMDA reporting that made an evaluation of lending performance impossible.

# Union Capital Mortgage was issued a Cease and Desist on Nov. 12, 2009 order as a result of its MLCI examination and is no longer in business.