

PUBLIC DISCLOSURE

October 7, 1996

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

AmSouth Bank of Georgia

Rome, Georgia

Federal Reserve Bank of Atlanta
104 Marietta Street, N.W.
Atlanta, Georgia 30303

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of AmSouth Bank of Georgia, Rome, Georgia, by the Federal Reserve Bank of Atlanta, the institution's supervisory agency.

This evaluation represents the agency's current assessment and rating of the institution's CRA performance based on an examination conducted as of October 7, 1996. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977, (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and (2) take the record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

ASSIGNMENT OF RATING

Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance in meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Institution's Rating:

This institution is rated Satisfactory, based on the findings presented in the following discussion of the institution's performance.

DISCUSSION OF INSTITUTION'S PERFORMANCE

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

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

AmSouth Bank of Georgia (ABG) is committed to ascertaining the credit needs of its community and communicating the credit services it offers to all segments of the community. The bank has an established officer call program that focuses on business development, promotes banking services in the business community, and provides ongoing outreach to the community. The officer call program targets locally owned and operated small businesses, including minority-owned businesses. Regular contact is made with existing and potential customers, local government officials, community development agencies, small and minority-owned businesses, and realtors.

Bank directors, officers, and employees participate as members, directors, and officers of numerous housing, civic, business, and community organizations. Organizations contacted include Gordon County Industrial Development Authority; the City of Rome River Development Committee; the Georgia Housing and Finance Authority in Calhoun; Chattooga County Cooperative Joint Planning Committee; the Fort Oglethorpe Office of the Habitat for Humanities; Lafayette Vista Community Services; the local chambers of commerce; and many other local government agencies and community-related groups.

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

AmSouth Bancorporation, ABG's holding company, directs the overall compliance with CRA. The board of directors of ABG has established a CRA policy for the bank. The city president is responsible for developing an annual CRA action plan and providing regular activity reports to the corporate community affairs officer. The bank's CRA coordinator assists the city president in administering the CRA program. The CRA action plan sets forth objectives including credit needs ascertainment, efforts to raise awareness of credit and banking services, local community development and investment, and efforts directed towards public-private partnership lending. The board of directors receives periodic reports on the bank's CRA-related activities, and the board's efforts ensure compliance with the technical requirements of CRA. The board reviews and adopts a CRA Statement annually. The statement describes affirmative efforts to meet local community credit needs. The most recent statement was approved on March 19, 1996. Bank management and the board of directors also ensure that bank personnel receive CRA training regularly. Overall, bank management and the directors have demonstrated that CRA compliance is a priority throughout the organization.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

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

The bank's holding company has a corporate marketing department that oversees media-related advertising for the bank. Coverage is extensive because the bank uses mainstream print media such as newspapers and trade journals and includes target-focused publications where available. Other media include television and radio, with inclusion of target-focused broadcasters in the advertising campaigns. Budgets are provided at the city level to promote the bank's services and products through event-related sponsorships and related brochures and programs.

Through its holding company, the bank conducted a media campaign in 1996 to promote its Affordable Housing Program. This marketing initiative was in addition to the calling efforts of mortgage loan officers who were directed to call on realtors who serve low- and moderate-income areas. The initiative consisted of six weeks of advertising in various newspapers and radio stations with an emphasis on those that reach low- and moderate-income consumers. Loan officers have also marketed this product by conducting numerous home ownership seminars.

The bank continued to promote its Flexline product, which provides relatively uncomplicated financing and deposit services to businesses with annual revenues of \$5 million or less. The financing option has lower fees than conventional business financing. Marketing initiatives included personal calls; branch advertising such as banners; direct mail; and advertising in newspapers and business-oriented magazines. Goals were established for loans and deposits, and the calling effort became a part of the existing, ongoing business development call program.

The bank also advertised its home equity line of credit through radio and print media with an emphasis on closing costs, origination fees, or annual fees under certain conditions.

ABG placed advertisements in several newspapers throughout the northwestern region of the state as shown below.

The Walker County Messenger

Fort Oglethorpe Press

Catoosa County News

Rome News-Tribune

Calhoun Times

Summerville News

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

In addition, the bank places advertisements for its affordable housing product on the following radio stations within the community: WQTU, WJTH, WSAF, WEBS, WRGA, WGTA, and WTSH.

ABG also advertises its mortgage products through direct mail campaigns, statement stuffers, and flyers developed for distribution during sales calls.

The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

The bank offers a variety of credit products to meet the community's needs. The types of credit products offered, as listed on the bank's CRA Statement, include a variety of consumer, real estate, business, and government entity loans. The bank also offers mortgage loans with flexible underwriting guidelines. The Affordable Housing Program (AHP) is designed to assist low- and moderate-income families with obtaining affordable housing. Features of the AHP include a 3 percent down payment, which can come from gift funds or grants, and a 30-year fixed-rate term. Applicants must participate in a home buyer educational program sponsored by ABG. For 1995, the bank originated 8 AHP loans totaling \$319,736, and for 1996 year-to-date, the bank originated 3 AHP loans totaling \$107,064.

A review of the loan portfolio revealed that the bank offers and extends all types of credit listed in its CRA Statement. The September 30, 1996 Consolidated Reports of Condition and Income showed a \$231 million loan portfolio that consisted of the following:

LOAN TYPE	PERCENTAGE
Construction and development	0.4
Secured by one- to four-family dwellings	57.9
Other real estate:	
Farmland	0.7
Multifamily	2.2
Nonfarm nonresidential	8.1
Agricultural and production	0.1
Commercial and industrial	5.7
Loans to individuals	22.7
All other	2.2
Total	100.0

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

The table above illustrates that ABG's most significant lending activity is consumer lending, including loans secured by one- to four-family dwellings.

According to the September 30, 1996 Consolidated Reports of Condition and Income, the bank's asset size was \$325.8 million, and the loan-to-deposit ratio was 86.3 percent. The bank's loan-to-deposit ratio falls within the range of its competitors.

The institution's participation in governmentally insured, guaranteed, or subsidized loan programs for housing, small businesses, or small farms.

The bank offers Small Business Administration (SBA), Federal Housing Administration (FHA), and Veterans Administration (VA) loans. In addition, the bank participates in a local program, the Georgia Housing and Finance Authority Program. State and local programs designed to promote community development are discussed in the Community Development section of the evaluation.

The bank has not originated any SBA loans to date, although lending personnel recently attended a training session offered by the SBA. Management said that the bank has been able to fund most business loan requests without the SBA guarantee because of the Flexline product. In 1995, the bank funded \$1.3 million in FHA/VA loans.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of Delineated Community

ABG has defined its delineated community as portions of five counties located in the northwestern section of the state. The counties are Floyd, Chattooga, Gordon, Walker, and Catoosa. The community includes 57 census tracts and block numbering areas (BNAs). Of the 57 census tracts and BNAs, 3 are designated as low-income; however, the 3 have no population and are designated public land. Of the remaining 54 census tracts and BNAs, 9 are defined as moderate-income, 32 are considered middle-income, and 13 are defined as upper-income. The delineated community seems reasonable and does not arbitrarily exclude any low- or moderate-income neighborhoods.

The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

The bank did not have a branch in a metropolitan statistical area until 1995; consequently, it was exempt from the reporting requirements of the Home Mortgage Disclosure Act (HMDA). During the examination, an analysis was conducted to determine the geographic distribution of loans. The bank is most active in the areas of consumer and small business lending. 122 secured consumer loans and 99 small business loans

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

were geocoded and analyzed to determine the percentage of loans originated in the delineated community. 115 (94 percent) of the consumer loans sampled and 90 (91 percent) of the small business loans were extended to individuals and businesses located in the community.

The distribution of loans to borrowers of different income levels was also analyzed. The comparison of 1990 Census income information to the percentage of secured consumer loans made to individuals of different income levels shows a reasonable distribution. The following table details the distribution of the sampled secured consumer loans by borrower income:

Income Level	Percentage of Families within Income Level	Percentage from Sample within Income Level
Low	19	6
Moderate	17	27
Middle	23	31
Upper	41	36

As illustrated above, the percentages of secured consumer loans made to moderate- and middle-income individuals exceed the percentages of families in those categories. The low percentage of loans made to low-income borrowers could be attributed to the large percentage (10.2 percent) of families who are below the poverty level. It is not economically feasible for families who are below the poverty level to obtain loans.

In addition to the analysis of loan distribution by income level of the borrower, an analysis of the distribution of loans by the income level of the census tracts and BNAs was conducted. The following table details the results of this analysis:

Income Level	Percentage of Tracts/BNAs within Income Level	Consumer Loans		Small Business Loans	
		Number of Loans within Income Level	Percentage of Loans within Income Level	Number of Loans within Income Level	Percentage of Loans within Income Level
Low	5.3	0	0	0	0
Moderate	15.8	8	7	8	9
Middle	56.1	71	62	55	61
Upper	22.8	36	31	27	30
Total	100.0	115	100	90	100

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

As previously mentioned, the three census tracts and BNAs designated as low-income are public land and have no population. As the table shows, a significant majority of the loans were made to individuals and businesses located in the middle-income geographies.

The institution's record of opening and closing offices and providing services at offices.

The bank has seven full-service offices located in the cities of Rome, Calhoun, Fort Oglethorpe, Lafayette, and Summerville, Georgia. Three of the offices are located in Rome. Generally, the lobby hours for the various locations are Monday through Thursday from 9 a.m. to 4 p.m., and from 9 a.m. to 6 p.m. on Friday. The drive-in windows provide extended hours at most locations. Saturday banking hours are from 9 a.m. until 12 p.m. except at the Calhoun and Fort Oglethorpe offices. The bank has automated teller machines (ATMs) located at each branch office, except Summerville, and six off-site ATMs. One of the off-site ATMs is located at a local college, and five are located in local Favorite Market stores. In addition, the bank offers personal computer banking services and telephone banking services to provide 24-hour access to deposit account holders and loan customers. Telephone banking services include loan payments and account information. There is a separate service for phone-in loan requests.

The bank has not closed any banking offices; however, it has consolidated its operations at 400 North 5th Avenue into the main office location at 1400 Turner McCall Boulevard. Because these offices were less than one mile apart, this was treated as a relocation. The board of directors of ABG has adopted a branch closing policy as required by section 42 of the Federal Deposit Insurance Act.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement.

ABG is in compliance with the substantive provisions of antidiscrimination laws and regulations. No evidence of discrimination or other illegal credit practices was noted during the review of the bank's loan policies and procedures. These policies and procedures are reviewed periodically by management. No practices are in place that have the intent or the effect of discouraging applications.

The bank has established second review procedures for all declined credit applications. The second review procedures were designed to ensure that all applicants receive fair and equal consideration. In addition, the bank provides fair lending training for its loan personnel at least annually.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES (CONTINUED)

Evidence of prohibited discriminatory or other illegal credit practices.

The bank solicits credit applications from all segments of its local community. An analysis of the bank's accepted and rejected credit applications was performed. No evidence of discrimination against any protected classes of applicants was noted.

V. COMMUNITY DEVELOPMENT

The institution's participation, including investments, in local community development and redevelopment projects or programs.

The management of ABG is generally aware of community development programs in the local community.

Community Assistance Partners, Inc.

In Rome, the bank participates in a local consortium that provides down payment assistance to low-income, first-time home buyers. The qualifying home buyer is eligible for loan amounts up to \$2,000 interest free. The funds do not have to be repaid until the home is sold or title is otherwise transferred. This consortium was formed by local area lenders in conjunction with the city of Rome.

Georgia Housing and Finance Authority

In Calhoun, the bank participates in the Home Housing Rehabilitation Program (HOME), which is a public-private partnership. The purpose of this program is to provide funds to rehabilitate housing in low- and moderate-income areas of the city of Calhoun. To date, the bank has funded 1 loan in the amount of \$6,700. The city of Rome has applied to the Georgia Department of Community Affairs for a \$200,000 grant to enable the city to offer a similar program.

Gordon County Industrial Development Authority (IDA)

Management maintains contact with representatives from Calhoun, which is located in Gordon County. The IDA has not had a borrowing need lately; however, it is in the acquisition and development process for a second industrial park and anticipates a borrowing need in 1997.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

V. COMMUNITY DEVELOPMENT (CONTINUED)

Other Credit-Related Activity

The bank has funded several loans that contribute to the development of the community. Examples of these include a \$250,000 working capital loan to Sheltered Work Services, a nonprofit organization that seeks to provide employment positions for local, disabled citizens. Also, a \$27,142 business installment loan was made to the YMCA of Rome to assist the organization with a fixed expense. ABG provided the Catoosa County Development Authority with a \$1,750,000 line of credit to assist with the construction cost of a new building.

Additionally, the bank has taken an active role in lending to churches in the community. Since 1995, the bank has extended credit for various church projects totaling \$324,495. Of the seven loans made during that period, one request was from a minority church.

Bank management has invested in many local municipal bonds. Examples of these include two bonds that were issued by Calhoun Recreation Authority for a total of \$225,000; another bond was issued by Floyd County Development in the amount of \$100,000; and one bond was issued by Adairsville Water and Sewer in the amount of \$160,000.

The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions, and other factors.

Community Profile

ABG is located in northwest Georgia and owned by AmSouth Bancorporation, Birmingham, Alabama. As previously mentioned, the bank has seven offices: in Rome, and one each in the cities of Calhoun, Summerville, Fort Oglethorpe, and Lafayette. The population of the delineated community was 239,369 according to the 1990 Census data. The community had 95,849 housing units, of which 67.3 percent were owner-occupied, 25.8 percent were rented, and 6.9 percent were vacant. The median family income for the delineated community was \$29,548.

The following table identifies family income levels in the bank's delineated community according to the 1990 Census:

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

V. COMMUNITY DEVELOPMENT (CONTINUED)

Family Income Level	Number of Families	Percentage of Families
Low-income	13,039	19.1
Moderate-income	11,833	17.3
Middle-income	15,570	22.8
Upper-income	27,817	40.8
Total	68,259	100.0
Below poverty	6,963	10.2

The area's economy is diversified in the manufacturing, retail, and service industries. Manufacturing is the main source of employment in Summerville, Calhoun, Fort Oglethorpe, and Lafayette. The industries in Rome are concentrated more in retail and service. The unemployment rate was 5.7 percent according to the 1990 Census data.

Bank Profile

With total assets of \$325.8 million on September 30, 1996, ABG is a state banking corporation that was organized on January 30, 1993, and opened for business on February 1, 1993, in Summerville, Georgia. As a result of subsequent mergers, ABG moved its corporate headquarters to Rome, Georgia.

ABG is a subsidiary of AmSouth Bancorporation, a bank holding company headquartered in Birmingham, Alabama, and operates as an integral part of the AmSouth Bancorporation system. AmSouth Bancorporation, which reported September 30, 1996 assets of \$18.6 billion, operates 271 banking offices in four states: 125 offices in Alabama, 116 offices in Florida, 23 offices in Tennessee, and 7 offices in Georgia.

Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

The bank is a regular contributor to various charities and organizations throughout the community. The bank has donated office space, human resources, and funds for community activities, education, and charitable purposes.

No factors that would restrict the bank's ability to serve local credit needs were noted.

TO THE INSTITUTION EXAMINED:

THIS COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA. THE FOLLOWING ACTIONS MUST BE TAKEN TO FULFILL THE CRA'S REQUIREMENTS.

- C AT A MINIMUM, PLACE THE EVALUATION IN YOUR CRA PUBLIC FILE LOCATED AT YOUR HEAD OFFICE (AND A DESIGNATED OFFICE IN EACH OF YOUR LOCAL COMMUNITIES) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION.
- C PROVIDE A COPY OF THE EVALUATION TO THE PUBLIC UPON REQUEST (YOU ARE PERMITTED TO CHARGE A FEE NOT TO EXCEED THE COST OF REPRODUCTION AND MAILING IF APPLICABLE) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THIS LETTER.
- C ADD THE FOLLOWING LANGUAGE TO YOUR CRA PUBLIC NOTICE THAT IS POSTED IN EACH OF YOUR OFFICES, NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION:

"YOU MAY OBTAIN THE PUBLIC SECTION OF OUR MOST RECENT CRA PERFORMANCE EVALUATION, WHICH WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA, AT (YOUR MAIN OFFICE ADDRESS)."

FEDERAL RESERVE BANK OF ATLANTA

MARCH 7, 1997

ASSISTANT VICE PRESIDENT

(Date)

CYNTHIA C. GOODWIN

(Title)

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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TO THE FEDERAL RESERVE BANK OF ATLANTA

A COPY OF THE COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION PREPARED AS OF THE CLOSE OF BUSINESS OCTOBER 7, 1996, BY AN EXAMINER FOR THE FEDERAL RESERVE BANK OF ATLANTA HAS BEEN RECEIVED AND WILL BE MADE AVAILABLE TO THE PUBLIC IN THE MANNER STATED IN THE LETTER WHICH ACCOMPANIED THE EVALUATION.

(Signature of Authorized Officer)

(Title)

AMSOUTH BANK OF GEORGIA

(Name of Bank)

ROME, GEORGIA

(Location)

FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin
ASSISTANT VICE PRESIDENT

March 7, 1997

Board of Directors
AmSouth Bank of Georgia
1400 Turner McCall Boulevard
Rome, Georgia 30162

Dear Board Members:

Enclosed is the bank's Community Reinvestment Act Performance Evaluation prepared by Federal Reserve Examiner Nancy S. Lee using the guidelines established by the Federal Financial Institutions Examination Council. This evaluation was prepared in accordance with the Community Reinvestment Act (CRA), as amended by the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, and must be made available to the public. The following actions must be taken to fulfill the CRA's requirements.

- C At a minimum, place the evaluation in your CRA public file located at your head office (and a designated office in each of your local communities) no later than 30 business days after receiving this letter.
- C Provide a copy of the evaluation to the public upon request (you are permitted to charge a fee not to exceed the cost of reproduction and mailing if applicable) no later than 30 business days after receiving this letter.
- C Add the following language to your CRA public notice that is posted in each of your offices, no later than 30 business days after receiving the evaluation:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Federal Reserve Bank of Atlanta, at (your main office address)."

Please acknowledge receipt of this evaluation by signing and returning the attached blue form. The format and content of the evaluation should not be altered or abridged in any manner. You may wish to comment on this information detailing actions the bank has taken since the examination to meet its obligations under the CRA. Any written comments concerning the evaluation placed in the public file should also be forwarded to this office. If you believe any of the information included in the public evaluation is proprietary, please contact this Reserve Bank so that the appropriate action can be taken.

Board of Directors
AmSouth Bank of Georgia
Rome, Georgia

Our Community Affairs staff is available to assist you in determining and responding to community credit needs. Please feel free to contact Mr. Courtney Dufries at (404) 589-7226. If you have any questions concerning this report or any other compliance matter, contact Ms. Gale Williams at (404) 589-7223.

Very truly yours,

Cynthia C. Goodwin

Enclosures

FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin
ASSISTANT VICE PRESIDENT

March 7, 1997

Ms. Patricia Hartje
Regional Compliance Manager
Office of the Comptroller of the Currency
Marquis One Tower, Suite 600
245 Peachtree Center Avenue, N.E.
Atlanta, Georgia 30303

Dear Ms. Hartje:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Georgia, Rome, Georgia, as of October 7, 1996.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

Enclosures

FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin
ASSISTANT VICE PRESIDENT

March 7, 1997

Mr. Joel Palmer
Assistant Director II
Regional Operations - Compliance
Office of Thrift Supervision
1475 Peachtree Street, N.E.
Atlanta, Georgia 30309

Dear Mr. Palmer:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Georgia, Rome, Georgia, as of October 7, 1996.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

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FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin
ASSISTANT VICE PRESIDENT

March 7, 1997

Mr. Jimmy Loyless
Regional Director
Federal Deposit Insurance Corporation
One Atlantic Center, Suite 1600
1201 West Peachtree Street, N.E.
Atlanta, Georgia 30309-3449

Dear Mr. Loyless:

Enclosed for your information is a copy of the Community Reinvestment Act Performance Evaluation for AmSouth Bank of Georgia, Rome, Georgia, as of October 7, 1996.

A copy of our letter of transmittal to the bank's board of directors is also enclosed.

Very truly yours,

Cynthia C. Goodwin

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PUBLIC DISCLOSURE

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Bank: AmSouth Bank of Georgia

City and State: Rome, Georgia

Date of Examination: October 7, 1996