SECTION I

General Information

This document is an evaluation of the Community Reinvestment Act ("CRA") Performance of Fifth Third Bank of Columbus, Ohio, prepared by the Federal Reserve Bank of Cleveland, the institution's supervisory agency.

The evaluation represents the agency's current assessment and rating of the institution's CRA performance based on an examination conducted as of December 2, 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 supervisory institution 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 that 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 assessment 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.

SECTION II

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 groups needs to improve its 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.

SECTION III

Discussion of Institution's Performance

Institution's Rating

This institution is rated "Outstanding" based on the findings presented below.

ASSESSMENT OF RECORD

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Assessment Factor A - 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.

Fifth Third Bank of Columbus' ("FTB") CRA philosophy is that each employee plays an important role in the ascertainment and communication of the community needs. Management believes that each employee's involvement in community and church groups as well as other organizations can assist management in identifying and meeting the needs of the community. In support of this philosophy, FTB has developed a multifaceted program as outlined in this section.

Currently, the bank operates in an area which encompasses four entire counties and a portion of a fifth. FTB identifies its community credit needs in each of these areas through the outreach efforts of its community affairs office, senior management, branch managers, and employees. In addition, employees serve on various bank Community Reinvestment Act ("CRA") related committees as well as outside community outreach and development committees. Credit and banking needs ascertained through employee community involvement are evaluated and if feasible, products are designed to meet the credit needs of the community.

One of the primary methods of ascertaining the community credit needs is the use of a formal call program. This program requires all managers, the community affairs officer ("CAO"), cash management officers, trust officers,

private banking officers, and consumer and indirect lending officers to make a specific number of calls each month to existing and prospective small to medium size business customers. Information obtained through the calls is documented on "officer call sheets" which are retained by the appropriate regional manager. Any calls deemed as "CRA-related" are also given to the CAO. Other methods of ascertaining credit needs include the periodic "Banking Center Blitzes" in which senior management accompanies banking center managers on "cold calls" in targeted areas to ascertain community needs. All information is documented on call sheets and reviewed by the CAO.

FTB also has a Loan Originator Call Program in which residential real estate loan originators make a specific number of calls to minority realtors in an ongoing effort to increase the bank's penetration in minority and low- and moderate-income areas. Additionally, officers and employees work with various organizations throughout the delineated community in ascertaining and attempting to meet the needs. Examples include attendance at various neighborhood commissioner meetings where issues pertaining to a particular neighborhood are discussed. Attendance at these meetings affords FTB knowledge of neighborhood concerns and a chance to help develop solutions. Currently, the CAO is a commissioner and active member of the North Linden Neighborhood Commission. In addition, several other officers serve on community-based and governmental organizations' board of directors.

As part of the CRA program, a Community Affairs Department was created. The department is managed by the CAO whose responsibilities include building and enhancing strong relationships with community leaders, community groups, nonprofit organizations, and local realtors. To meet these responsibilities the CAO coordinates the ascertainment efforts of the officer calling program, the banking centers, and blitzes and maintains ongoing contact with government officials, community groups, and nonprofit organizations. In addition, the CAO tries to identify key activities that will enhance FTB's relationship with low- and moderate-income ("LMI") communities and individuals.

FTB was instrumental in the formation of the Central Ohio Compliance Organization ("COCO"). COCO is a consortium comprised of community affairs and community development staff from the local financial institutions in which Ms. Carter participates. The group meets monthly to ascertain community needs and implement programs ranging from educational to financial fundraising events to satisfy the needs identified. Examples of these programs include a seminar explaining the new CRA regulation to nonprofit groups, community leaders, and local realtors. The group also raised money for the Martin Luther King Center and the City of Columbus community reinvestment planning sessions. Participants in the planning sessions were given the opportunity to

meet with city staff and neighborhood residents to discuss various issues.

All of the bank's CRA activities are reviewed and discussed at the monthly Community Affairs Action Group ("CAAG") meeting. The CAAG analyzes the results of the ascertainment activities and makes recommendations to the Executive Committee for implementation of new products and programs. Other duties of the CAAG include reviewing and periodically updating the CRA program and overseeing the CRA training. The CAO chairs this committee. Members of the committee include representatives from real estate, consumer and commercial lending; branch administration; marketing; and operations. Representatives from other departments participate as needed.

Ascertainment efforts and results are evaluated against the bank's annual CRA goals and work plan. The annual plan sets out a mission statement and an overview while the work plan sets forth objective, quantifiable standards of measurement. Quarterly, the various departments involved in the ascertainment program submit status reports to the CAO. The reports detail progress made in achieving the annual goals. The 1996 CRA goals and work plan incorporated the new CRA "three pronged test" which consisted of lending, service, and investment. Additionally, the plan included community development. Accomplishments for the second and third quarter of 1996 include the following:

Consumer Lending Department planned to increase the number of calls on minority home improvement dealers and establish three banking relationships with minority-owned Home Improvement Dealers. By the end of the second quarter, the indirect lending area had called on 18 dealers classified as CRA targets. The department also continues to work with Energy Star, Columbia Gas, Energy Works, and Home Energy Ratings of Ohio. These programs are designed to assist in efficiently heating and cooling homes. The OHIO TRAIN program generated 27 loan applications during the third quarter. The program is designed to provide low-interest loans to disabled persons seeking to purchase new assistance devices.

Commercial Mortgage Department's goals include continuing to grow its asset base, with particular emphasis on owner-occupied opportunities, and development of the outlying markets. The Commercial Mortgage Department closed 13 loans by the end of the second quarter.

Public Funds Department planned to make loans to governmental agencies for various permanent improvements and hold educational seminars. The department made three loans in the second quarter for a total of eight loans year-to-date. The loans were extended to government

agencies for various permanent improvements. The department held three educational seminars. During the third quarter, the department financed a new township hall and utility truck for Jefferson township, provided funds for the renovation of the city of Pickerington municipal and police building, and financed the purchase of Pickaway County voting machines.

Private Banking Department's goals include making calls on minority prospects and customers as well as establishing minority private banking relationships. The department has established a working relationship with a minority attorney who is referring business to FTB. In addition, the department has established one minority private banking relationship and opened one private banking account with another minority-owned business. The department, in conjunction with a commercial lender, held a financial seminar for surgical residents which included minority physicians.

Residential Mortgage Department planned to increase its FHA lending and Good Neighbor Loans (combined) by 50% over 1995 figures. In addition, the department wants to educate potential home buyers, make low income housing available, and enlighten the community on what home ownership involves. By the end of the second quarter, the Mortgage Loan Department had implemented a new Good Neighbor Program Option, the "97 Plus." The department also initiated a mailing campaign targeting minorities and hosted four mortgage blitzes. The target audience for the blitzes was local realtors with the focus on raising their level of awareness concerning FTB mortgage options. During the third quarter, a proposal was sent to the Columbus chapter of the Urban League for FTB employees to serve as instructors at a credit college the Urban League is creating in February of 1997. The "Home Sweet Home" program was started during the third quarter. In addition, three home buyer seminars were held in conjunction with a private mortgage insurance company.

Small Business Lending Department's goals are to increase small business lending activity in the delineated community. The target group is small businesses with gross annual revenues of $1 million or less. The Small Business Lending Department made eight new loans and increased and/or renewed six existing loans to companies of the target size

Community Development Department will continue to seek opportunities that support affordable housing for low- or moderate-income individuals, provide community services and activities that promote economic growth,

development, and stabilize low- or moderate-income geographies. During the second quarter, the Community Caring Committee provided funds to 27 organizations located within the delineated communities. FTB also sponsored four Friends Organized to Revitalize ("FORCE") activities. One of the activities was the Christmas in April project where volunteers painted, cleaned, and repaired homes of the elderly and disabled. During the third quarter, the CAO served as an instructor at the Columbus Neighborhood Housing Services ("CNHS") First Time Home buyer Seminars and published a three part article in a local minority publication addressing home ownership.

FTB has an outstanding record of determining the credit needs of its community. FTB upholds its community relationships through ongoing, meaningful contact with individuals and groups representing community development interests, participation in public programs, and by maintaining productive relationships with private developers. The board of directors and senior management demonstrate a willingness to explore and offer conventional products with special features to make credit more widely available, within the bounds of safe and sound lending practices. The bank offers products well-suited to meet identified needs, which include government-insured and publicly-sponsored programs.

Assessment Factor C - 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.

The expanded CRA Statement was revised in August 1996 and approved at the September 18, 1996, board of directors meeting. Included in the Statement is a CRA Mission Statement, the CRA Notice, and the CRA Policy. The policy outlines FTB's goals and objectives, assignment of responsibilities, technical compliance, CRA performance program, products and services, and credit policy. Also included in the policy is FTB's marketing strategy, and policy implementation through the various call programs, FORCE, the community involvement/volunteer program, the CRA officer, the Community Affairs Action Group, and the board of directors.

The board of directors' role in the CRA program is outlined in the bank's CRA policy. As discussed above, annually the bank develops a CRA work plan that details goals for the year. Achievement of these goals is monitored quarterly. Annually, in addition to the CRA Statement and Policy review, the board of directors reviews the CRA program. This review includes a geocoded analysis of the disposition of loan applications as well as the bank’s lending patterns. All of the directors reside and work or have worked in the delineated community.

Each director maintains an active role in the community. Board minutes and executive committee minutes reviewed contained discussions concerning community credit and service needs. Discussion items at these meetings include the following:

- special community project funding requests,
- proposed/requested new services and products,
- new services and product activity,
- loan activity,
- market penetration within delineated communities,
- CRA regulatory updates (training), and
- policy and/or procedure changes.

Members of the directorate are personally involved in activities designed to improve the local community, including the Columbus Housing Partnership, the United Way, the Boy Scouts of America, the Planing and Zoning Committee, and the YMCA. They consistently consider prudent but innovative underwriting criteria which address community credit needs. Finally, they ensure that technical CRA requirements are met.

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

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

FTB has implemented sound marketing and advertising programs that are monitored by senior management and the board of directors. Advertisements are designed to stimulate awareness throughout the entire community, including low- and moderate-income neighborhoods. Marketing strategies ensure that products and services are responsive to identified community needs.

The bank employs a number of different strategies to make members of its community aware of the credit products it offers. Traditional media such as newspaper, television, and radio are used, as well as community sponsorships and educational seminars. The bank maintains records of its advertising which are reviewed and evaluated regularly to assess a campaign's effectiveness. FTB has also established procedures to review proposed marketing campaigns for compliance with applicable laws and regulations.

The marketing department performs surveys and studies within the local

community to better understand the credit needs of the market which FTB services, to evaluate the quality of the service, and to determine why accounts close. Representation on the Community Affairs Action Group by the marketing officer provides interaction with all lending areas within the bank. It assists the marketing group in keeping abreast of the needs determined by the ascertainment process. This involvement leads to product development and the subsequent marketing of new products and services. Information on planned products is reported to Fifth Third Bancorp to ensure consistency and cohesive product development in response to the needs assessed. Examples of this type of product development include:

The Basic Banking Checking Account offered in response to an ascertained need for low-cost checking accounts for persons who write only a few checks per month.

The Phone-A-Loan Program, which allows consumers to apply for a loan by telephone, was developed in response to consumers' desires for a nonintimidating environment in which to apply for a loan.

The Secured Credit Card is offered in response to the ascertained need for a credit card for consumers who have insufficient or problem credit history and cannot obtain an unsecured credit card.

The Good Neighbor Program is offered to families with low- to moderate-income. The program offers discounted loan rates and fees.

The bank utilizes a broad based marketing program which includes the use of special media to reach targeted low- to moderate-income communities. The bank allocates a certain percentage of its marketing budget to those objectives. Increased efforts in special media include transit and billboard advertising, use of smaller community and minority newspapers, special mailing campaigns, and statement stuffers. In addition, more focused use of area wide newspapers and television advertising is sometimes used in order to create awareness in targeted communities.

To more effectively reach African American consumers, the bank advertised in a variety of media aimed at this market segment. Advertisements have been placed in publications including *The Columbus Post, Kwanza Publications, Columbus Personal Business Monitor, National Associations of Urban Bankers - Bankers Central Region, SNP,* and *The Blue Chip Profile.* Products promoted included mortgage loans, general banking services, consumer loans, and checking accounts.

During 1996, a wide variety of marketing programs were implemented, covering all product lines. The largest campaign occurred in connection with the Bank's acquisition of NBD Bank, Columbus, Ohio ("NBD"). The advertising campaign ran for approximately eight weeks. Advertisements were placed on billboards, radio, newspaper print, television, statement stuffers, and direct mail. The print media included *The Columbus Dispatch* as well as area suburban papers and minority-targeted newspapers. The radio media included urban, pop, and country stations located throughout the delineated community.

The bank conducted a special promotion during February in recognition of Black History Month, offering a special discount on mortgage loans. In connection with this promotion, the bank made a cash contribution to the Neighborhood Housing Partnership to assist in their efforts to find affordable housing for low-income residents.

During June, July, and August FTB launched a campaign to raise the community's awareness of the Good Neighbor and FHA mortgage loan products. The Good Neighbor products target primarily low- to moderate-income ("LMI") residents and homes in LMI census tracts. Advertisements were placed in minority newspapers and on urban radio stations. In addition, one urban station, WCKX had a remote broadcast from a banking center to promote the loans. The program featured FTB employees who provided information on the availability of loan products offered at the bank. FTB also hosted four realtor open houses at banking centers located in LMI areas of the community.

The bank initiated a new loan program in connection with the Ohio Technology Related Assistance Information Network ("Ohio TRAIN"), a department of the Ohio State University which addresses the needs of individuals with disabilities. FTB developed a low interest loan product specifically for applicants who are disabled and qualify for technology assistance. This program was marketed throughout the state by Ohio TRAIN and through the bank's offices.

Several other promotions and campaigns occurred during 1996, focusing on retail and small business accounts. In each case, a variety of methods were used to reach the community members, including print media, radio, television, direct mail, statement stuffers, statement messages, point-of-sale materials, and signs at the banking offices. When external advertising was used, it was placed in the general media as well as media directed at minority and low-income residents.

The marketing department performs a periodic in depth analysis of all advertising campaigns to determine each one's effectiveness. The analysis is also to ensure each campaign is reaching the targeted market. The results of

the analysis are periodically reviewed by management.

Assessment Factor I - 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.

According to FTB's CRA Statement the bank is prepared to offer the following credit products and services:

- Residential and Commercial Mortgage Loans:
  - FHA/VA insured residential real estate mortgage loans;
  - Good Neighbor Program;
  - Conventional real estate mortgages for 1-4 family residences;
  - Home improvement and rehabilitation loans;
  - Second mortgage loans; and
  - Commercial loans for construction or purchase of multi-family residences, businesses, and industrial property.

  In addition, FTB has partnered with the State of Ohio to offer down payment assistance to families whose incomes are under 80% of median income.

- Commercial Loans
  - Secured and unsecured commercial loans
  - Government Assisted Business Loans such as
    - Small Business Administration ("SBA") loans
    - SBA 7A business loans
    - SBA 504 Loan Program
    - Other federal, state, and local financing programs

- Installment Loans
- Home Improvement Loans
- Student Loans
- Revolving Loan Products
  - VISA
  - MasterCard
  - Secured VISA
  - Check Card
  - Equity Line of Credit
- Leases
- Farm Loans
- Community Development Loans

The bank's statement correctly lists all of FTB's credit products available. The types of credit offered are reasonable, based on the identified community needs. Lending levels reflect a responsiveness to the community. The bank's loan-to-deposit ratio as of September 30,1996, was 91%. The bank monitors its loans monthly. Loans are broken out by census tract, LMI census track, type of loan such as CRA loans, governmentally-insured loans, and Home Mortgage Disclosure Act ("HMDA") loans. These reports are reviewed by the Community Affairs Committee and individually by the CAO. CRA loans are loans made in a LMI area, to small businesses located in a LMI area and/or to a minority- or female-owned business and individuals in LMI areas.

FTB has three primary lending departments; residential, consumer, and commercial. The small business lending activity is part of the commercial department. The bank continually monitors the lending activity in an effort to stay "tuned with community needs." Reports are generated by product type, LMI census track areas, and by race. These reports are reviewed to ensure the products are meeting the community needs and when necessary to enhance program features if the results indicate a change is necessary or identify an unmet need. From this continual monitoring, the Good Neighbor Program has been enhanced over the years to include the following options.

GOOD NEIGHBOR PROGRAM OPTIONS				
	3/2 Option	**Good Neighbor**	**97% Option***	**2/1 Option or ½ Option**
Annual Household Income Limit	Licking, Madison, Pickaway, Franklin, Delaware, Fairfield: $44,100 Union: $46,200 Fayette: $32,600	Household qualifications and income restrictions (1)	Licking, Madison, Pickaway, Franklin, Delaware, Fairfield: $44,100 Union: $46,200 Fayette: $32,600	Licking, Madison, Pickaway, Franklin, Delaware, Fairfield: $50,715 Union: $53,130 Fayette: $37,490
Sale Price Maximum	N/A	$80,000	N/A	N/A
Property Location	N/A	Targeted Cities & Census Tracts (2)	N/A	Targeted Cities & Census Tracts (2)
Maximum LTV (3)	95%	95%	97%	97%

GOOD NEIGHBOR PROGRAM OPTIONS				
Minimum Down Payment	3% of Sale Price Borrower's Savings Plus 2% gift (4)	3% of Sale Price Borrower's Savings Plus 2% gift (4)	3% of Sale Price Borrower's Savings	2% of Sale Price Borrower's Savings plus 1% gift OR 1% of Sale Price Borrower's savings plus 2% gift (4)
Home buyer Training (5)	Required	Required	Required	Required
Loan Plan(s)	Fixed Rates Only	Fixed Rates Only	Fixed Rate, 5/5 & 5/1 ARMs	Fixed Rates Only
Mortgage Insurance	Required	Required	Required	Required
Occupancy (6)	Owner Occupied Only	Owner Occupied Only	Owner Occupied Only	Owner Occupied Only
Ratios	33% / 38%	33% / 38%	28% / 36%	33% / 40%
2 Months Reserves	Waived	Waived	Only 1 month's reserves required	Only 1 month's reserves required
Escrows	Required	Required	Required	Required
Pricing	Market Rate minus 0.125%	Market Rate	Market Rate	Market Rate
Closing Costs (7)	Maximum $500 (8) including Title Insurance	Maximum $255 (8) including Title Insurance	Current	Current

Item numbers (1) through (8) refer to clarification and additional terms of each product.

The latest enhancement to the Good Neighbor Program was the "97 %" or the "97 Plus" option which was introduced March 18, 1996. The program is targeted to borrowers interested in purchasing single- and two-family homes in the central city and to borrowers earning up to 115% of the area's medium income. This is a partnered program with PMI Mortgage Insurance Company.

FTB also created a Good Neighbor Business Development group comprised of individuals who work in and/or manage branches located in LMIs. The group assists in the business development of and enhancements to the program. In addition to the Good Neighbor Program, the bank reinstated the "Home Sweet

Home" version of the Good Neighbor Program. The bank has allocated a $3,000,000 pool of funds for Franklin County and a $300,000 pool of funds for Licking, Fayette, Union, and Pickaway Counties. This program will end December 31, 1996. Both the Home Sweet Home program and its larger companion Good Neighbor are designed to provide loans to first time home buyers and to low- and moderate-income home buyers. However, the Home Sweet Home program offers even more flexible terms such as waiving private mortgage insurance on loans with a loan to value ratio greater than 80% and a higher debt to income of 33% / 40%.

FTB has partnered with the United States Environmental Protection Agency ("EPA") to participate in the Energy Star Program. The purpose of the program is to encourage the purchase of high efficiency heating and cooling equipment. The target audience for this program consists of homeowners living in the older areas of Columbus, Ohio. FTB is the only financial institution in Ohio which has formed a partnership with the EPA to provide financing for these purchases. The bank is offering a home improvement loan at 1% below its standard home improvement loan rate with a maximum term of 84 months on unsecured loans and 120 months on secured loan. Prior to applying for the loan, the homeowner must have received a free energy rating offered through the Energy Star Program.

The bank has also partnered with Columbia Gas to offer the Columbia Gas Energy Saver Program. The program is very similar to the Energy Star Program. The bank and Columbia Gas have made special arrangements to assist homeowners in updating or purchasing new gas heating and cooling equipment. Customers can finance the purchase of the equipment at 1% below the current home improvement loan rate. Additional terms of the loans include 84 months maximum term; loan amounts of $1,000 to $10,000; 100% financing with no down payment; loans can be either secured or unsecured.

During Black History Month, the bank developed a special promotion to raise awareness of FTB as a lender in the African American community. The promotion included a $250 reduction in closing costs on mortgage loans and a $50 cash bonus on any new installment loan of $5,000 or higher.

<u>Assessment Factor J - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses, or small farms.</u>

The bank participates in a number of government-insured, guaranteed, or subsidized loan programs for housing and small businesses within its

community.

The Columbus/Franklin County MicroLoan Program ("Program") was created in 1993. It is funded by the U. S. Small Business Administration ("SBA"). The Program is sponsored by The Columbus Countywide Development Corporation ("CCDC"), the Columbus Area Chamber of Commerce, the Franklin County Private Industry Council, the Service Corps of Retired Executives ("SCORE") and the City of Columbus. In addition to the SBA, six Columbus financial institutions, National City Bank, Bank One of Columbus, Huntington National Bank, Key Bank, Fifth Third Bank of Columbus, and NBD Bank (recently acquired by Fifth Bank of Columbus) provided funds to create the program. The purpose of the program is to encourage the creation and stability of small businesses by providing financing and technical assistance.

Applications from existing business will be evaluated on the history of their operating the business, along with at least a one-year projection. New businesses are required to prepare an adequate business plan documenting the market for the product or service, proposed management of the business, and financial projections prior to consideration under the Program. Entrepreneurs who seek assistance in the development of the business plan are encouraged to use the resources of the Small Business Development Center of Columbus and SCORE. Borrowers from the Program are required to participate in a series of Technical Assistance Group meetings over the first year of their loans. The meetings provide information on such things as practical business development, including financing, bookkeeping, and marketing. Technical assistance is also available to help with specific challenges faced by the borrower.

FTB originally contributed toward the start-up of the fund in 1993. In 1995 the bank contributed additional funds to expand the Program. With the additional funds, the Program will be expanded into Delaware and Fairfield Counties.

The bank has participated in the Starr/High Apartments Limited Partnership ("Partnership"). The project was sponsored jointly by the Columbus Housing Partnership, Inc. ("CHP"), a nonprofit housing development corporation and by the Lutheran Social Services of Central Ohio ("LSS"), a nonprofit service provider. The project involved the rehabilitation of two vacant buildings containing 35 residential units located in the Registered Historic District in the "Short-North" neighborhood of Columbus. Rental of the units is targeted to very low-income single or two-person households. At least 20% of the units will be occupied by households with incomes at or below 50% of the area median and the remaining units may be occupied by households with incomes of up to 60% of the median income.

FTB committed funding in the form of construction loans to the Stoddard Block

Limited Partnership. The funds will be for the rehabilitation of property located at 260 South Fourth Street, Columbus, Ohio. The property consists of one building containing 52 studio units, five of which will be equipped for handicapped tenants, plus 2,000 square feet of office space to be leased to CHP on a permanent basis. The project is sponsored by CHP and LSS. The purpose of the project is to provide affordable downtown housing units to LMI individuals.

The bank is also working with two other local institutions to provide the end financing on the Homes of Linden Project, a housing development project. St. Stephen's Community Homes plans to build 30 single-family, owner-occupied, three bedroom houses in the South Linden area. Homes will only be constructed once they are sold. The buyer is required to have a $800 minimum deposit. The City of Columbus will provide Downtown Assistance Program ("DAP") funds to the buyer. South Linden is classified as a Distressed Community neighborhood by the Columbus Countywide Development Corporation ("CCDC"), and the development of the new homes will provide affordable housing to local residents. The Distressed Community ("Community") as defined by the CCDC is primarily the Columbus central city and area northeast of the central business district. The Community contains a population of approximately 56,722. The area measures 12.7 square miles with maximum dimensions of 4.3 miles north-south and 8 miles east-west. While almost all of the areas of the Community lie within the Columbus corporate boundaries, the far eastern portion of the Community contains areas in two other jurisdictions, the city of Gahanna and Mifflin Township. All three areas are located in Franklin County.

More recently, the bank has committed funds to the Columbus Downtown Housing Development Fund ("CDHDF"). The CDHDF committee is comprised of Bank One of Columbus, Huntington National Bank, Provident Bank, Star Bank, Fifth Third Bank of Columbus, National City Bank, Key Bank, State Savings Bank ("Participants") and the City of Columbus Economic Development Division. A loan pool has been established by the Participants to fund the renovation or new construction of rental, single-family, and condominium housing in the downtown area of the City of Columbus. The loans will be originated, funded and serviced by the Participants.

FTB and CCDC entered into a Community Partnership Agreement ("Agreement") for the establishment of the Columbus Growth Fund ("CGF"). Under the Agreement FTB has agreed to provide the CGF a loan for the creation of a loan pool and a grant for the establishment of a loss reserve fund. CGF was established under the U.S. Treasury Department's Community Development Financial Institutions ("CDFI") program. The purpose of the CGF will be to assist small, growing businesses by providing primarily term permanent working

capital financing. The CGF investment will be in partnership with loans from area participating lenders. Typically, lenders would be financing needed equipment, additional working capital, and perhaps real estate investment.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of Delineated Community

Fifth Third Bank of Columbus' CRA Statement defines its delineated community "to include Delaware, Fayette, Franklin, Pickaway, and Union Counties." A map is attached to the CRA Statement clearly outlining the delineated community. The delineation includes the main office which is located in Columbus, Ohio, branches and deposit taking ATMs, and areas in which a substantial portion of FTB's loans have originated or been purchased. The majority of the branches are located within Franklin County which is reflective of the distribution of loans.

Within the delineated community, FTB operates 47 banking centers and bank marts, as well as 52 ATM locations. As of the date of examination, 42 banking centers and marts are located in Franklin County. The remaining centers and marts are distributed as follows: two in Fayette County and one each in Delaware, Pickaway, and Union Counties. Of the 47 banking centers, 32 are traditional banking centers and 14 are bank marts. Typically, the traditional offices' hours are between 8:00 a.m. and 5:00 p.m.

The bank marts are banking facilities housed in Kroger grocery stores. The marts are full service banking centers with extended office hours. Typically, the offices are open to the public between 10:00 am and 8:00 pm seven days a week. The bank marts allow FTB to offer banking services to the community in a nontraditional atmosphere coupled with nontraditional banking hours.

The bank's delineated community meets the purpose of CRA and does not exclude low- to moderate-income neighborhoods.

Assessment Factor E - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

FTB's delineation consists of 274 census tracts and 7 Block Number Areas ("BNA") in the Columbus Metropolitan Statistical Area ("MSA") . The following tables reflect the distribution of the census tracts among the delineated counties, and indicates the number of LMI census tracts in each county.

County	# of Census Tracts	# of BNAs	# of LMI
Delaware	12	0	1
Fayette	0	7	0
Franklin	250	0	100
Pickaway	12	0	4

FTB's main office and 42 of its branches are located in Franklin County with 12 of the branches located in LMIs. The majority of LMI census tracts are located in the city of Columbus and the surrounding communities. The City of Columbus has identified five of the LMI tracts as community reinvestment areas and has targeted them for redevelopment due to their very depressed nature. The identified areas are South of Main, Hilltop, Greater Linden, Italian Village, and Southwood. The identified community reinvestment areas are limited to a few select streets within the census tract area.

As noted above, the remaining branches are located in Delaware, Fayette, Pickaway, and Union counties. FTB does not have much penetration in these counties due to the number and the location of its branches. The branch located in Delaware County is located in what is considered to be a LMI census tract. Efforts by branch staff are generally made to ascertain and meet the credit needs of the entire community. Because of these factors, the primary focus of this evaluation will be on Franklin County.

As discussed previously, the bank completes an annual self-assessment of its performance. The self-assessment includes an analysis of FTB's lending activity by using various system generated reports as well as an analysis of the HMDA data. Outlined in the table below are the results of the 1995 year-end analysis of the lending activity in the City of Columbus' community reinvestment areas:

PURCHASES				
AREA	CENSUS TRACT	APPLICATION	ORIGINATED	DENIED*
Greater Linden	77.1	1	0	1
Hilltop	45.0	2	1	1
Italian Village	22.0	0	0	0
South of Main	58.1	1	1	0
Southwood	54.1	0	0	0

REFINANCES				
AREA	CENSUS TRACT	APPLICATION	ORIGINATED	DENIED*
Greater Linden	77.1	2	1	1
Hilltop	45.0	1	0	1
Italian Village	22.0	0	0	0
South of Main	58.1	3	1	2
Southwood	54.1	0	0	0

HOME IMPROVEMENT				
AREA	CENSUS TRACT	APPLICATION	ORIGINATED	DENIED*
Greater Linden	77.1	13	5	8
Hilltop	45.0	11	5	6
Italian Village	22.0	0	0	0
South of Main	58.1	6	5	1
Southwood	54.1	4	1	3

*Includes withdrawn, approved not accepted, and incomplete loan applications

The following tables list the demographic characteristics of the census tracts within the bank's delineation, as well as FTB's penetration of the various types of tracts. The income and racial characteristics are determined by the 1990 census data and the information is taken from FTB's 1995 HMDA report.

Note: Low to moderate-, middle-, and upper-income census tracts are based on

a percentage of the median income of the MSA and are represented as a percentage within the MSA. The percentages are as follows:

- Low to moderate-income represents less than 80% of the median income;
- Middle-income represents incomes between 80% to 120% of median income; and
- Upper-income represents incomes over 120% of the median income.

Low minority, integrated, and high minority census tracts are based upon a percentage of the minority population of the MSA and are represented as a percentage within the MSA. Minority population equals the sum of all nonwhite races plus those of white Spanish origin. The percentages are as follows:

- Low minority represents a minority population of 20% or less;
- Integrated represents a minority population of between 20% and 80%; and
- High minority represents a minority population of 80% or greater.

INCOME COMPOSITION

	Number of Census Tracts	Percentage of Census Tracts	Population of Census Tracts	Population Percentage
Low to Moderate	105	38	342,332	32
Middle	107	39	407,203	38
High	62	23	326,834	30
TOTAL	274	100	1,076,369	100

RACIAL-INCOME COMPOSITION

	Number of Census Tracts	Percentage of Census Tracts	Avg Adjusted $ Income of Tract
Low-Inc Minority	17	16	19,249
Low-Inc Integrated	41	39	25,558
Low-Inc White	47	45	30,546
TOTAL	105	100%	26,656

RACIAL-INCOME COMPOSITION			
	Number of Census Tracts	Percentage of Census Tracts	Avg Adjusted $ Income of Tract
Middle-Inc Minority	2	2	36,709
Middle-Inc Integrated	9	8	40,156
Middle-Inc White	96	90	44,576
TOTAL	107	100	44,183

RACIAL-INCOME COMPOSITION			
	Number of Census Tracts	Percentage of Census Tracts	Avg Adjusted $ Income of Tract
High-Inc Minority	0	0	0
High-Inc Integrated	4	6%	61,773
High-Inc White	58	94%	66,875
TOTAL	62	100%	66,786

FTB'S RECORD OF LENDING BY INCOME COMPOSITION OF CENSUS TRACT								
	FTB				AGGREGATE			
Census Tracts	# of APS	% of APS	% Origi-nations to APS	% of Denials to APS	# of APS	% of APS	% Origi-nations to APS	% of Denials to APS
LMI	428	23.8	52.3	35.5	11232	23.2	52.0	28.5
MI	722	40.2	63.9	20.8	20483	42.4	65.6	17.7
HI	647	36.0	76.4	9.6	16616	34.4	76.1	9.6
TOTAL	1797	100.0	65.6	20.3	48331	100.0	66.1	17.4

KEY:
APS - Applications
LMI - Low to moderate-income
MI - Middle-Income
HI - High-Income

FTB'S RECORD OF LENDING BY RACIAL COMPOSITION OF CENSUS TRACT								
	FTB				AGGREGATE			
Census Tracts	# of APS	% of APS	% Origi-nations to APS	% of Denials to APS	# of APS	% of APS	% Origi-nations to APS	% of Denials to APS
MIN	103	5.7	47.6	42.7	2570	5.3	43.5	33.6
INT	234	13.0	44.4	42.2	5639	11.7	49.1	31.1
WH	1460	81.2	70.3	15.0	40114	83.0	69.9	14.4
TOTAL	1797	100.0	65.6	20.3	48331	100.0	66.1	17.4

Key:
APS - Applications
MIN - Minority
INT - Integrated
WH - White

An analysis of the bank's 1995 HMDA data indicated that FTB had application activity in its low to moderate-income and minority census tracts. Additional review of the data shows that FTB compared favorably with other institutions in its market as indicated by the above tables.

FTB performs extensive analysis of its HMDA data periodically as well as during its annual self assessment. Various reports are generated to track the geographic distribution of the bank's credit applications, extensions, and denials. Any information regarding deficiencies noted in the distribution of credit are addressed by the appropriate department of the bank. For example, the bank reviewed its HMDA data for January 1996 through June 1996 and issued a report to senior management. The report noted a need to strengthen FTB's lending record for both low- and moderate-income and minority applicants. The report went on to note that the figures had improved in July 1996. In addition, the report included measures taken to strengthen the weaknesses.

The 1996 self assessment revealed the following information from FTB's analysis of 1995 aggregate HMDA data in LMI tracts.

PRODUCT	% of FTB'S MARKET SHARE
FHA / VA	0.26
Conventional	1.64
Refinance	1.12
Home Improvement	9.86

As a result of the analysis, management concluded that increased penetration in the LMI census tracts where FTB has branches was necessary. The need is currently being addressed, and an increase in penetration has been noted in analyses performed on the 1996 HMDA data.

Assessment Factor G - The institution's record of opening and closing offices and providing services at offices.

Since the last compliance examination conducted by the FDIC, FTB has opened four branches, Bexley-Alum Creek Branch, Whitehall Branch, Hillard-Rome Branch, and Northern Lights Branch. In May 1994, the bank acquired the Clintonville North Branch, the Circleville Branch, and the Marysville Branch through the acquisition of Equitable; and in February 1996 the bank acquired 11 branches through the acquisition of NBD Bank. Six branches were relocated; however, these moves were not greater than one mile. In addition, four branches have been closed. All of the closed branches were consolidated with nearby branches. The branch relocations and closures have been due to a duplication of services in an area as a result of an acquisition. The bank followed its branch closing policy and properly notified customers and the appropriate regulatory agencies. As outlined in the policy, the bank considers the following factors:

< the impact on the community,
< alternative sources,
< certain criteria such as
  a. the profitability of the banking center;
  b. demographic growth or decline trends in the community and commercial and retail banking potential; and
  c. usage of the center to determine whether there is sufficient demand to justify the continuance of an office in its current operations.
< credit access, and
< nondiscrimination.

The board of directors has adopted the branch closing policy, and it adequately addresses issues to be considered prior to closing an office. The policy is reviewed periodically and revised, if necessary, by the board of directors.

The bank currently operates 47 banking centers and bank marts throughout its delineated community. The bank also has an extensive ATM network that is available for 24 hour banking. Branch locations and hours appear to meet the service needs of the community.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Assessment Factor D - Any practices intended to discourage applications for types of credit set forth in the institution's CRA statement(s).

No practices intended to discourage applications were noted during the examination. The bank's lending policy emphasizes the availability of credit on a nondiscriminatory basis. A review of loans sampled during the examination indicate that the bank generally solicits credit applications from all segments of its community, including low- to moderate-income neighborhoods.

Fair lending training is mandatory for all lending personnel. Training is provided at least annually. Training focuses on the specifics of fair lending laws as well as the treatment of customers in terms of providing consistent service to all customers throughout the application process.

Management believes that a second review process is an important control to ensure that all applicants receive equal treatment and assistance. The second review process is also important to ensure that credit decisions are made in accordance with the lending policy. Based on this philosophy, FTB has developed a second review policy for the mortgage, consumer, and commercial lending departments. The policy outlines the process for the second review. The process primarily focuses on loan denials for certain protected classes of applicants as well as designated loan programs. The second review process confirms that the underwriters have properly considered mitigating and compensating factors as well as calculated and obtained information properly. In addition, the process will confirm that the underwriters offered alternatives and assistance such as restructuring the loan request or discussing other loan programs, as appropriate. The second review process is designed to assure equal treatment for members of protected classes of applicants. Although the second review process does not review approved loans, underwriters are required to discuss all loans made outside of normal underwriting guidelines with their managers.

The Audit Department also conducts fair lending reviews. Using the HMDA data and the bank's LOMAS system, "marginal" credits are identified. Marginal credits are loans in which the ratios were just outside of the bank's lending guidelines. Marginal approvals of white applicants are compared to denials of similarly situated minority applicants. HMDA data is also used to track denial rates of minorities versus nonminorities.

FTB is working to ensure that dealers, appraisers, and other third parties that do business with the bank understand fair lending issues and take steps to ensure that applicants are treated fairly. The bank routinely conducts various seminars and training sessions for these parties.

Assessment Factor F - Evidence of prohibited discriminatory or other illegal credit practices.

There was no evidence of discrimination or any other illegal credit practices noted during the course of the examination. No credit practices inconsistent with the substantive provisions of the fair housing and fair lending regulations were identified during the examination.

A review of the bank's 1994 and 1995 HMDA data was performed to determine compliance with fair lending laws. The analysis revealed a few technical violations, but no evidence of discrimination was noted.

V. COMMUNITY DEVELOPMENT

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

The bank's commitment to its delineated community is demonstrated through the directors', officers', and staff's involvement and leadership in the community. FTB's commitment to community development efforts is also demonstrated through its general lending activities and donations to community endeavors.

Efforts to support the under-served areas of the bank's market include sponsorships of events and cash contributions to community assistance organizations. In 1996, the bank was the presenting sponsor of The Blue Chip Gala, an event which honors African American professionals who have made an impact on the community. Other events in which FTB was involved include the Martin Luther King Birthday Breakfast, African American Heritage Consortium, the Hilltop Business Association Parade, the Asian Festival, the Comin' Home Festival, and the Kroger Senior Expo.

Examples of FTB's community involvement include the ongoing contact with the Columbus Neighborhood Housing Services ("CNHS"), a nonprofit housing service agency on whose board a bank employee serves. The bank works closely with the agency in providing first time homebuyer seminars, and the organization also serves as a source of referrals for mortgage loan applicants.

The bank also provides and/ or participates in special counseling programs with The Neighborhood House Inc., Columbus Housing Partnership ("CHP"), St. Stephen's Community House, and the Columbus Mortgage Bankers. In addition, the bank recently participated with a local church in a mortgage blitz that targeted many first time home buyers. The program was designed to prequalify potential borrowers and provide insight into FTB's underwriting standards.

The bank is closely involved with CHP, a nonprofit agency that develops housing for low- and moderate-income residents in other ways. Another organization the bank works with is the Main Street Business Association. The bank participates in its annual clean up as well as other volunteer activities hosted by the organization. In addition, the CAO serves on the Urban League Fair Housing Board.

Another community development project the bank is involved with is the Christmas in April program. Christmas in April is an annual, one day effort to repair and rehabilitate homes belonging to elderly, handicapped, and low-income residents of Columbus. The goal of the program is to make the homes warm, safe, and dry for their owners. Christmas in April is based on the idea of an old-fashioned barn raising where neighbors come together and in a single day transform a home in need into a home in good repair, that is safe for the homeowner. The bank has participated in the program since 1993 by sponsoring two homes each year.

FTB consistently participates in community development projects as the opportunities arise if management feels the projects fit within the goals and objectives of its CRA program.

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

There are no known current legal impediments or financial factors which would affect FTB's ability to meet the credit needs of its delineated community.

The bank has established good working relationships with government and private sector representatives to identify opportunities for FTB's involvement in addressing community credit needs. The bank continues to play a leadership role in developing and/or implementing specific projects promoting economic revitalization and growth.

Community Profile and Bank Profile

The city of Columbus is located in Franklin County in south central Ohio. Columbus is the state capital of Ohio and serves as the Franklin County seat. Census Data for 1990 estimates the city's population to be 633,000 and the county's to be 961,437. The Columbus Metropolitan Statistical Area ("MSA") consists of six counties: Franklin, Delaware, Licking, Fairfield, Madison, and Pickaway. The MSA covers 3,143 square miles in Central Ohio and defines the Greater Columbus Labor Market. The estimated population of the MSA is 1,377,419.

The Columbus MSA is growing. The 1990 Census shows a 10 percent increase over the previous census. This growth is in direct contrast to state and regional trends which other show other urban areas losing population. A diverse economic base is one of the reasons for the consistent rate of growth in Columbus. Its central location and easy accessibility by way of Interstate Routes 70 and 71 have made it a marketing, distribution, and warehouse center. The city is also a center for manufacturing, banking, real estate, and insurance. *Fortune Magazine* rates Greater Columbus among the top five cities by numbers of innovative firms and by quality of the labor force. Some of the prominent local firms include CompuServe, Battelle Memorial Institute, Worthington Industries, and The Limited, Inc. The top ten employers are:

Top Ten Employers	
State of Ohio	28,931
Federal Government	16,500
Ohio State University	16,290
Honda of America	10,700
The Limited, Inc.	9,000
Nationwide Insurance Ent.	8,672
AT&T	7,000
City of Columbus	6,410
Franklin County	6,370
Riverside Hospital	5,000

As a result of the educated population and an increasingly expanding market, Franklin County is well below the October 1996 state and national unemployment figures of 4.7% and 5.2%, respectively. The county unemployment rate is currently 2.7%.

The racial, age, and gender compositions of the area are illustrated in the three tables below:

Race Percentage of Population					
	White	**African American**	**Asian**	**Hispanic**	**Other**
Columbus	74.5	22.6	2.3	0.9	0.7
Franklin County	81.5	15.9	2.0	0.9	0.6
MSA	86.0	12.0	1.5	0.7	0.5

Adult Age Segments (%)			
	Years		
	18-44	**45-64**	**65+**
Columbus MSA	48.8	17.8	10.0
Ohio	41.9	19.3	13.0
U.S.	43.2	18.7	2.5

Population Percentage by Gender	
Columbus MSA	
Female	51.2
Male	48.7

The median age is 32.6 as compared to 34.6 for the general population in the state of Ohio. Over 77% of the residents have completed high school and more than 16% have college degrees. The median household income is estimated to be $39,283 annually with 543,800 households in the metropolitan area. Retail sales for the six-county region in 1995 were approximately $16 million, a 34% increase over 1990.

Fifth Third Bank of Columbus operates a total of 47 banking centers and bank marts, as well as 52 ATM locations. The majority (42) of the banking centers and marts are located in Franklin County. The remaining centers and marts are

distributed as follows: two in Fayette County and one each in Delaware, Pickaway and Union Counties, respectively. Of the 47 banking centers, 32 are traditional banking centers and 14 are bank marts located in area Kroger grocery stores. Primary bank competition is provided by subsidiaries of major Ohio-domiciled financial institutions including Key Bank, Columbus; Huntington National Bank, Columbus; The Provident Bank, Columbus; and Bank One, Columbus, N.A. Other competition is provided by State Savings Bank, Columbus and various brokerage firms.

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

Bank employees, management, and directors participate in a wide variety of other meaningful activities which benefit the community. The bank has developed a formalized volunteer group, Friends Organized to Revitalize Community Efforts ("FORCE"). Through this group, many employees volunteer hours of service to activities that promote raising funds for charitable organizations to rehabilitate buildings such as schools and homes for the elderly and/or disadvantaged individuals. Additionally, time and effort are dedicated to teaching reading skills to the illiterate and serving as Junior Achievement counselors in middle and high schools. The hours spent by this group total approximately 4,000 per year. The bank also provides extensive support to the United Way Fund of Franklin County. In addition to the financial support, the bank provides the United Way with a Loaned Executive for four months of the year.

The bank reviews all community requests for donations through the Community Caring Committee. Requests come from local nonprofit organizations, individuals, and various other entities. Each request is reviewed to determine whether it meets the committee's goal of making contributions that contribute to education, community development and housing for low and moderate income persons.

Other community activities include offering savings seminars to residents of Faith Mission clustered housing units. The Faith Mission program assists individuals who are experiencing financial or personal hardships but are rebuilding their lives. These individuals are now employed and being assimilated back into society. The savings seminars stress the importance of setting aside savings. The bank has also submitted a proposal to the Columbus Urban League to assist in the Urban League Credit College program. The Urban League plans to establish the program in the first quarter of 1997. FTB's plan is to provide housing opportunities to their graduates via bank owned

properties. Additionally, the bank will facilitate sessions that relate to the mortgage application process, including but not limited to, pre-qualification, the application process, underwriting, and closing. The bank's exact role in the program has not been finalized yet.

Two other significant community contributions have been to the Pontifical College Josephinum. This contribution helped rehabilitate a recreation facility. The facility is open to youths of low-income neighborhoods. The other contribution was to the Windsor Terrace Learning Center to help provide a program where individuals in the South Linden area could receive tutoring for GED testing. Windsor Terrace is in a depressed area, and its residents are in the low- to very low-income bracket.