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Community Reinvestment Act Performance Evaluation

Bank of Oklahoma, National Association
Charter Number: 13679

Bank of Oklahoma Tower, Williams Center
Second Street at Boston Avenue
Post Office Box 2300
Tulsa, Oklahoma 74192

Office of the Comptroller of the Currency
Southwestern District Office
500 North Akard Street, Suite 1600
Dallas, Texas 75201-3394

NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial

supervisory agency concerning the safety and soundness of this financial institution.

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Bank of Oklahoma, National Association (BOK)** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **April 5, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

Low-Income - Income levels that are less than 50% of the median family income.

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

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

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

The following table indicates the performance level of **Bank of Oklahoma, National Association (BOK)**, with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank of Oklahoma, National Assc Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- < BOK has established an adequate record of lending among geographies and borrowers of various income and revenue levels.

- < Retail services provided by BOK are adequate and reasonably accessible to persons and entities of various income levels in its six assessment areas. In its largest areas, however, accessibility continues to be more favorable to middle- and upper-income geographies.

- < BOK has provided, during the evaluation period, a good level of community development loans, investments, and services throughout its assessment areas.

Description of Institution

BOK, headquartered in Tulsa, Oklahoma, is the largest locally owned bank in Oklahoma. As of March 31, 1999, BOK reported total assets of \$5.9 billion, Tier I capital of \$341 million, and loan-to-deposit ratio of approximately 74%. BOK is a wholly-owned subsidiary of BOK Financial Corporation (BOKF), a multi-bank holding company also headquartered in Tulsa. BOKF also owns banks in Arkansas (Bank of Arkansas, N. A.), Texas (Bank of Texas, N. A.), and New Mexico (Bank of Albuquerque, N. A.).

BOK's operations are predominantly in the Tulsa and Oklahoma City metropolitan areas, but it also has operations in four other areas of Oklahoma, as described in detail hereafter. BOK operates 64 branch offices and 297 automated teller machines. In accordance with the CRA regulation, and at the request of BOK, mortgage lending activity of the subsidiary was considered in this evaluation. Through the ownership of mortgage lending operating subsidiaries in four states, the bank also operates sixteen loan production offices (LPOs) for residential mortgage loan originations. Six (38%) of these LPOs are located in bank's defined assessment areas, in middle- or upper-income census tracts.

The bank's business strategy centers on residential real estate and commercial lending activities. There are no significant financial barriers limiting BOK's ability to help meet the identified credit needs of its assessment areas. Oklahoma statutes impose significant limitations on additional new branching activities, and acquisition of existing institutions are limited by a cap on deposit market share.

The bank offers a diverse choice of commercial, real estate, and consumer loan products, including credit cards and student loans, and retail and commercial deposit products. As of March 31, 1999, the loan portfolio represented approximately 46% of total assets, with commercial loans accounting for 85% of the portfolio. Consumer and residential real estate lending accounted for 10% and 5% of the portfolio, respectively. As is customary in the banking industry, the majority of the real estate mortgage loans originated by BOK are sold into the secondary market. Therefore, these loans do not make up a large portion of the bank's lending portfolio.

BOK has identified six assessment areas within the state of Oklahoma that were used in this evaluation of the bank's CRA performance. These areas are the Tulsa MSA, the Oklahoma City MSA, the Enid MSA, Northeastern Oklahoma (NEO) Region (six counties), Muskogee Region (three counties), and the Kay County

Region (one county). These assessment areas include 22 of the 77 counties in Oklahoma (28%), representing more than 61% of the state's population.

As of June 30, 1998, (latest available calculations) the Federal Deposit Insurance Corporation (FDIC) reported that BOK maintains slightly more than 15% of the commercial bank deposits in its assessment areas. The Tulsa MSA accounts for 64% of BOK's total deposit base, followed by the Oklahoma City MSA with 22%, the Muskogee Region with 6%, the NEO Region with 5%, the Enid MSA with 2%, and the Kay County Region with 1%. For additional detailed information about these defined assessment areas, please refer to **Appendix B: Market Profiles for Areas Receiving Full-Scope Reviews**.

A CRA Performance Evaluation dated October 22, 1997, was previously prepared for BOK, and a **Satisfactory** performance rating was assigned.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test at this examination was from January 1, 1997, through December 31, 1998. Lending products reviewed included small business loans, community development loans, home mortgage and refinance loans, and home improvement loans.

The evaluation period for the Investment and Service Tests was from October 22, 1997 (the date of the previous examination) through April 5, 1999. The Investment Test included a review of investments, grants, and donations made in the bank's assessment areas that meet the definition of community development investments. The Service Test included a review of retail and community development services provided in the bank's assessment areas.

Data Integrity

Prior to this CRA examination, OCC personnel performed a review to determine the accuracy of lending-related data supplied by BOK. That review found the data to be reliable, as no significant inaccuracies were revealed. As a result, publicly reported lending data may also be considered accurate.

Selection of Areas for Full-Scope Review

Resources were available during this examination to perform full-scope reviews for all of the bank's assessment areas. The bank has six assessment areas, of which two, Tulsa and Oklahoma City, constitute the great majority of its deposit and lending activities. As will be evident to the reader, however, consideration in this evaluation is given to the bank's activities and accomplishments in all of its assessment areas.

Ratings

The bank's overall rating is weighted more heavily on those areas that constitute the majority of its activities. However, the extent to which the bank is providing lending, investments, and services in all of its assessment areas was given significant consideration in assigning the overall rating for the bank.

Other

Numerous community contacts performed by the OCC and other regulatory agencies during the evaluation period were reviewed. These contacts represented all of the bank's assessment areas. Four contacts were made in Tulsa and Oklahoma City as a part of this examination. The group of contacts reviewed included small business development and economic development agencies, realtors, public officials, at least one small neighborhood association, and a private not-for-profit developer. The needs identified have been typical, ie., small business and affordable housing lending. In aggregate, the comments received have been positive about the manner in which BOK and other banks have provided needed credit, investments, and services in the communities. At least two contacts noted, nevertheless, that area banks, including BOK, tend to require documentation and to set requirements for not-for-profit borrowers which seem to them excessive, given the level of credit and relative risk to the banks.

Fair Lending Review

Compliance with fair lending laws and regulations is satisfactory. A review of fair lending laws and regulations did not reveal any evidence of illegal discriminatory treatment to borrowers from a prohibited basis group. Indirect automobile loans originated from October 1998 through December 1998 were selected for review. The rates, terms and conditions of loans provided to approved female and male applicants were reviewed for a difference in treatment. Our review for compliance with the fair lending laws also included technical compliance with the Equal Credit Opportunity Act (ECOA).

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in all assessment areas is adequate. Variations in performance among the assessment areas and among lending products are described below.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

BOK has demonstrated a good responsiveness to the assessment area credit needs through the number of home mortgage related loans and small business loans originated during the evaluation period. The bank's loan to deposit ratio as of March 31, 1999, is 74%.

Table I demonstrates that the bank's primary business strategy is on residential real estate and commercial lending. The volume of loans originated for home mortgage activity is three times the number of small business loans originated. As noted in the description of the institution, commercial loans account for 85% of the loan portfolio while residential real estate lending represents 5% of the portfolio. However, the majority of the home mortgage loans originated are sold into the secondary market and are not carried on the bank's balance sheet. The most weight in analyzing BOK's lending performance focuses on home mortgage and small business lending. A detailed analysis of small farm lending was not included in this analysis because it is not a primary line of business and the volume of small farm loans made during the evaluation period is not significant.

Home mortgage and small business lending market share rankings reflect good performance in the Tulsa MSA compared to its deposit market share ranking. BOK ranks first in the volume of deposits in the market as well as first in market rank for home purchase, refinance, and small business lending. Many of the top lenders in the market are mortgage companies.

Home mortgage and small business lending market share rankings reflect adequate performance in the Oklahoma City MSA compared to its deposit market share ranking. BOK ranks fourth in the volume of deposits in the market and first in market rank for home purchase originations although BOK's market share is not significantly different from the second ranked lender. This would indicate there is strong competition in this market and no clear leader. Rankings in home improvement, refinance, and small business lending are not as strong in comparison to the deposit market rank.

Home mortgage and small business lending market share rankings reflect good performance in the Enid MSA compared to its deposit market ranking. BOK's market share in home purchase, home improvement, and small business lending significantly exceed the bank's deposit market share.

Small business lending market share rankings reflect good performance in the NEO region compared to the bank's deposit market share ranking. BOK's market share in small business lending and home improvement lending significantly exceed the bank's deposit market share. BOK ranks among the top lenders in home purchase and refinance lending, but the market share representing these products is below that of the deposit market share.

Small business lending market share rankings reflect good performance in the Muskogee Region compared to the bank's deposit market ranking. BOK also demonstrated good performance in home improvement lending. Home purchase and refinance lending activity is adequate compared to the deposit market share. The leading lenders in most home mortgage products in this assessment area are mortgage companies. The top deposit share ranked banks are not represented in the top 25 lenders in market share of any of the loans products being evaluated.

Home mortgage lending market share rankings reflect good performance in the Kay County Region compared to the bank's deposit market ranking. Small business lending market share is poor.

BOK made an adequate percentage of loans within its statewide assessment areas. This is supported by the fact that 90% of the small business loans and 74% of the HMDA reportable loans were originated within the assessment areas. The HMDA distribution may be additionally broken down as follows: home purchase - 73% within; home improvement - 96% within; refinance - 70% within.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

Tulsa MSA

BOK's home mortgage lending to individuals living in low-income census tracts is poor. The percentage of loans made by the bank in this type of census tract is less than 1% of the bank's mortgage loan originations. This is also substantially lower than the volume of owner-occupied housing units located within these designated census tracts even though less than 3% of the owner-occupied housing is located within low-income tracts.

Home mortgage lending by all lenders within the low-income census tracts of the assessment area is low. A total of 147 home purchase loans were made by all lenders in low-income census tracts in the Tulsa MSA. BOK and several other lenders made six home purchase loans each. The leading lender made only 14 home purchase loans in the low-income census tracts. The low-income census tracts are primarily located in Tulsa County and more specifically in North Tulsa. Home mortgage lending is affected by a very low turnover rate of existing housing stock in this area, and there has been very little new construction or development.

BOK's home mortgage lending to individuals living in moderate-income census tracts is adequate compared to the number of owner-occupied housing units available. BOK's strongest performance in the moderate-income census tracts of Tulsa is in home improvement lending.

The 1997 market share data reflects that BOK's home improvement loan origination market share in low income tracts is higher than its overall market share for this type of lending in the Tulsa MSA.

BOK has made home mortgage related loans in a substantial majority of all census tracts within the MSA. No conspicuous gaps in lending activity were noted. There are one low-income tract and three moderate-income tracts in which BOK did not make any home mortgage related loans. The one low-income census tract has a large volume of rental units which limits home mortgage lending opportunities. Additionally, approximately 16% of the housing units in this tract are boarded up.

Oklahoma City MSA

BOK's home mortgage lending to individuals living in low-income census tracts is adequate compared to the number of owner-occupied housing stock located in these designated tracts. There is not significant activity in the low-income census tracts by any of the lenders in Oklahoma City. There are quite a few low-income census tracts in which BOK did not make any home mortgage related loans. The great majority of these tracts have very little housing stock.

BOK's home mortgage lending to individuals living in moderate-income census tracts is adequate compared to the number of owner-occupied housing stock located in these designated tracts. BOK's strongest performance is represented by home improvement lending. This is reflective of the age of the housing stock which, based upon 1990 census data, averages more than 30 years old.

BOK originates loans in the majority of all census tracts within the assessment area. No conspicuous gaps in lending activity were noted. The majority of census tracts in which loans were not made were low- or moderate-income tracts. An analysis of the demographics of these tracts reveals that there is more rental and multi-family housing than owner-occupied housing. The moderate-income census tracts without activity have a large volume of rental and multi-family housing, as well.

Enid MSA

This MSA has no census tract designated low-income. BOK's lending to individuals living in moderate-income census tracts is good, as the percentage of home purchase and home improvement loans originated substantially equals the percentage of owner-occupied housing located in these designated census tracts. The bank's market share in moderate-income tracts also substantially equals its overall market share for these two loan products.

No conspicuous gaps in lending activity are noted as home mortgage loans were made in all census tracts within the MSA. Home mortgage loan originations were distributed throughout all types of census tracts.

Northeastern Oklahoma Region

There are not any low-income block numbering areas (BNAs) in this assessment area. BOK's lending in moderate-income BNAs is adequate for all mortgage related products evaluated during this period.

This level of lending has been affected by the fact that BOK has branches in two of the six counties that make up this region and that there is one mortgage originator working the area. There are three counties within this region that have moderate-income BNAs: Delaware, Ottawa, and Washington. All of the home purchase loans made by BOK in moderate-income BNAs are located in Delaware County. All lenders made a total of 33 home purchase loans in Ottawa and Washington Counties. This is approximately 25% of all home purchase loans originated in the region. BOK did not originate any home purchase loans in Ottawa or Washington Counties.

Stronger lending activity is noted in the middle- and upper-income BNAs. The majority of population of this region live in middle-income BNAs. According to 1990 U. S. Census Bureau information, approximately 65% of the population lives in middle-income BNAs while approximately 11% live in moderate-income BNAs. Also, according to the same information, about 66% of the owner-occupied housing is located in middle-income BNAs. Additionally, almost 73% of the low- and moderate-income families live in middle-income BNAs.

BOK made mortgage related loans in 80% of all moderate-income BNAs. The bank's lending activity is centered in those counties in which the bank has branches. There is a strong presence by other financial institutions in this area and in those counties where BOK does not have branches.

Muskogee Region

BOK's geographic distribution of lending in low- and moderate-income BNAs is good, even though BOK did not make any home mortgage related loans in the one low-income BNA in the region. That BNA, in Muskogee County, is primarily commercial and industrial and contains less than 1% of the population and owner-occupied housing in the region. Other lenders made a total of two home mortgage related loans in this BNA in 1997.

BOK's lending volumes in moderate-income BNAs are strongest for home improvement loans. The volume of home improvement loans in moderate-income BNAs exceeds the percentage of owner-occupied housing units. Home purchase and refinance lending volumes are lower than the same comparator, but do reflect an adequate volume.

BOK's market share of home improvement loan originations in moderate-income BNAs exceeds the overall market share for this product. The market share of home improvement loans in moderate-income BNAs exceeds that in middle- and upper-income BNAs, as well. Market share in moderate-income BNAs for home

purchase and refinance loans is only slightly less than the overall market share for these products.

BOK made home mortgage related loans in all low- and moderate-income BNAs.

Kay County Region

There are no low- and moderate-income BNAs in this assessment area; therefore, analysis of the geographic distribution of loans is not applicable.

Small Business Loans

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

Tulsa MSA

BOK's lending to small businesses located in low- and moderate-income census tracts is adequate compared to the potential opportunities represented within each. Small business lending levels in low-income census tracts is good as it closely mirrors the percentage of businesses located within these designated tracts. BOK ranks first in overall market share for 1997. Lending performance in low-income census tracts is less than the overall market share. BOK is one of several lenders who made nearly equal numbers of loans to businesses in low-income census tracts.

Lending performance in moderate-income census tracts is not substantially lower than the overall market share. BOK's market share in moderate-income census tracts is similar to its market share in middle-income tracts. BOK made almost 20% more loans to businesses within moderate-income census tracts than the next ranked lender.

There are no gaps in lending patterns in this assessment area. The volume of businesses located in those census tracts where there was no lending had a small number of businesses. Many of them contain fewer than 50 businesses.

Oklahoma City MSA

BOK's geographic lending distribution to small businesses is adequate. Small business lending levels in low-income census tracts is good as it closely mirrors the percentage of businesses located within these designated tracts. However,

small business lending in moderate-income census tracts is substantially less than the percentage of businesses located in these tracts.

BOK's overall market share ranks it in the top ten lenders; however, the volume of loans made by BOK in the assessment area was substantially less than the leading lender. BOK's market share in both low- and moderate-income census tracts is well below its overall market share.

BOK made small business loans in a substantial majority of low- and moderate-income census tracts. There is one area that includes both low- and moderate-income tracts in which no small business loans were made. That area includes census tracts in the southern portion of Oklahoma City. BOK has relocated its loan officers who specialize in SBA lending to its south office, partially in response to identified credit needs and to address this gap in small business lending activity.

Enid MSA

The Enid MSA does not have any census tracts that are designated as low-income. The geographic distribution of small business loan originations within moderate-income tracts is poor compared to the percentage of businesses located within these tracts.

Market share data for 1997 indicates that lending volumes by all lenders in moderate-income census tracts were low. BOK ranks second in overall market share to America Express who garnered 25% of the market with fourteen loans. BOK originated six loans. A total of 57 loans were originated by all lenders in the moderate-income census tracts in this assessment area.

BOK made small business loans in all but one census tract (a middle-income tract) in this assessment area. Only three percent of all businesses are located in this census tract.

Northeastern Oklahoma Region

The Northeastern Oklahoma Region assessment area does not have any low-income BNAs. The geographic distribution of small business loans in moderate-income BNAs is adequate as the volume of the bank's originations is slightly lower than the percentage of businesses located in these areas. The strongest lending pattern is to businesses located in middle-income BNAs. This is reasonable considering that more than 70% of the businesses are located in middle-income BNAs.

BOK ranks second in market share for 1997 lending activity. The leading lender in this region has more than twice the market share of BOK. The bank's market share in moderate-income BNAs is slightly lower than the overall market share. Most of the lending reflected in BOK's market share originated in Delaware County and Washington County.

BOK made small business loans in 60% of the moderate-income BNAs in the assessment area. BOK did not make small business loans in 46% of the BNAs in the assessment area. The substantial majority of those BNAs are located in Craig, Mayes, Nowata, and Ottawa Counties. BOK does not have any branches in these counties.

Muskogee Region

The geographic distribution of small business loan originations in low- and moderate-income BNAs is good. BOK's loan originations to businesses in low-income BNAs exceeds the distribution of businesses located there. BOK's lending in moderate-income BNAs is slightly less than the distribution of businesses located in those areas.

BOK's market share of 18% ranks it as the third leading lender of small business loans in the assessment area. The bank's market share in low-income BNAs significantly exceeds the overall market share. All small business lending in low-income BNAs occurred in Muskogee County as the other two counties in the assessment area do not have low-income BNAs. BOK's market share is approximately 1.7 times higher than the second ranked lender.

BOK is the highest ranked lender in the moderate-income BNAs in this assessment area. Although having the highest market share, BOK's market share is not significantly higher than the second-ranked lender (23% vs 21%). BOK made small business loans in moderate-income BNAs in two of the three counties included in this assessment area. Again, the largest portion of the small business loan originations are in Muskogee County. This is reasonable as 59% of the businesses in this assessment area are in Muskogee County.

There are not any conspicuous gaps in small business lending. BOK did not make loans in 31% of the BNAs in this assessment area. All but one of these are designated as middle- or upper-income areas. The majority of the BNAs without loan activity are located in Pittsburg County where the bank has only one branch. Only 8.5% of businesses in this area are located in these BNAs. Three of the BNAs in Pittsburg County without lending activity have no businesses.

Kay County Region

There are no low- or moderate-income BNAs in this assessment area; therefore, a geographic distribution of small business lending is not applicable.

Small Farm Loans

Refer to Table 6 in Appendix C for the facts and data about the bank's small farm loan originations.

A detailed analysis of the geographic distribution of loans to small farms is not included in this evaluation because this type of lending is not a significant part of the bank's business strategy. The volume of loans to small farms made during the evaluation period is not significant or sufficient for meaningful analysis.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Tulsa MSA

BOK's lending to low- and moderate-income individuals is adequate. Lending volumes to low-income individuals is significantly lower than the number of low-income families in the Tulsa MSA for all mortgage related products. BOK's strongest performance to low-income borrowers is in home improvement lending. Lending volumes to moderate-income individuals are good as home purchase lending and home improvement lending substantially approximates the percentage of moderate-income families in the Tulsa MSA.

The 1997 market share data for the Tulsa MSA shows that BOK's lending to low-income individuals is lower than the bank's overall market share for each mortgage related product. The market share for home purchase and home improvement loans is approximately 80% of the overall market share. Similar market share comparisons exist for the lending distribution to moderate-income individuals.

Oklahoma City MSA

BOK's lending to low- and moderate-income individuals is good. Lending volumes to moderate-income individuals for all mortgage related products substantially equals the percentage of moderate-income families in this MSA. The strongest performance is noted in home purchase lending where the bank's volume of loans exceeds the percentage of moderate-income families. The volume of home improvement lending to moderate-income individuals also demonstrates a good level of performance as the volume is only slightly below the percentage of moderate-income families.

Lending volumes to low-income individuals are adequate. The volumes are substantially lower than the percentage of low-income families but are reasonable. The bank's 1997 market share for low- and moderate-income borrowers approximates its overall market share as the largest lender of these products in the market.

The 1997 market share data reflects that BOK does not have a substantial overall market share for any mortgage related products in this MSA. The strongest performance, however, is demonstrated in home purchase lending where the bank is ranked first overall. The bank's market share to low- and moderate-income individuals is substantially lower than its market share to middle- and upper-income individuals.

Enid MSA

BOK's lending to low- and moderate-income individuals is good. The distribution of home mortgage products substantially equals the percentage of low- and moderate-income families. The strongest performance is demonstrated in home purchase lending where the volume of loans to moderate-income individuals substantially exceeds the percentage of moderate-income families. The volume of home purchase loans to low-income individuals demonstrates a good level of performance although not equaling the number of low-income families.

BOK ranks in the top three lenders for all mortgage related products. The 1997 market share data demonstrates the strongest performance again is in home purchase lending. BOK ranks first in overall market share for home purchase lending while its market share to low- and moderate-income individuals exceeds its overall market share. The market shares to low- and moderate-income individuals, respectively, exceeds the bank's market share of home purchase originations to upper-income individuals.

Northeastern Oklahoma Region

BOK's lending to low- and moderate-income individuals is adequate. The volume of home mortgage products to low-income individuals is low compared to the percentage of low-income families. The strongest performance to low- and moderate-income individuals is seen in the volume of home improvement lending. The volume of home improvement loans to moderate-income individuals exceeds the percentage of moderate-income families.

Muskogee Region

BOK's lending to low- and moderate-income individuals for all mortgage related products is adequate. Lending to low-income individuals is low for all products when compared to the percentage of low-income families. Overall lending to moderate-income individuals is adequate. The strongest performance is reflected in the volume of home improvement loans to moderate-income individuals as it exceeds the percentage of moderate-income families in the assessment area.

The 1997 market share data reflects that home improvement lending to moderate-income individuals exceeds the bank's overall market share for this loan product. Market share for the other mortgage loan products is not significant.

Kay County Region

BOK's lending to low- and moderate-income individuals for all mortgage related products is adequate. The strongest performance is reflected in home purchase lending to moderate-income individuals where the volume of loans exceeds the percentage of moderate income families. No home improvement loans were made to any low- or moderate-income individuals. BOK did not make any refinance loans to low-income individuals, but did make a reasonable volume of refinance loans to moderate-income individuals.

The 1997 market share data reflects that BOK ranked first in home purchase originations. The bank's market share to moderate-income individuals substantially exceeds the overall market share for this product. It also exceeds the market share of home purchase loans to middle- and upper-income individuals.

Small Business Loans

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

Tulsa MSA

BOK's lending to businesses with revenues of \$1 million or less is adequate. Approximately 57% of the reportable loans made were to businesses of this revenue size. This is not significantly higher than the originations made by all other lenders in the assessment area. Both are significantly lower than the number of businesses in the Tulsa MSA with similar revenues. The majority of the small business loans originated are in amounts less than \$100,000.

The 1997 market share data reflects that BOK ranks first in loans to businesses with revenues of \$1 million or less. BOK and two other lenders make up a significant portion of the market activity. This market share is comparable to the bank's overall market share.

Oklahoma City MSA

BOK's lending to businesses with revenues of \$1 million or less is adequate. Approximately 63% of the reportable loans made were to businesses of this revenue size. This is not significantly higher than the originations made by all other lenders in the assessment area. Both are significantly lower than the number of businesses in the Oklahoma City MSA with similar revenues. A substantial majority of loans made by BOK are in amounts less than \$100,000.

The 1997 market share data reflects that BOK ranks seventh in loans to businesses with revenues of \$1 million or less. BOK is not a market leader as there is a wide spread between the top ranked lenders and BOK's volume. This market share is comparable to the bank's overall market share.

Enid MSA

BOK's lending to businesses with revenues of \$1 million or less is excellent. Approximately 90% of the reportable loans made were to businesses of this revenue size. This is significantly higher than the originations made by all other lenders in the assessment area to small businesses. The great majority of loans made by BOK are in amounts of less than \$100,000.

The 1997 market share data reflects that BOK ranks second in loans to businesses with revenues of \$1 million or less. However, the difference in the number of loans made by BOK and the top ranked lender is one. BOK and one other lender

make up almost 60% of the market. This market share significantly exceeds the bank's overall market share of small business loan originations.

Northeastern Oklahoma Region

BOK's lending to businesses with revenues of \$1 million or less is good. Approximately 86% of the reportable loans made were to businesses of this revenue size. This is significantly higher than the originations made by all other lenders in the assessment area to small businesses. The majority of loans originated by BOK are in amounts of less than \$100,000.

The 1997 market share data reflects that BOK ranks second in loans to businesses with revenues of \$1 million or less. The first ranked lender has more than 50% of the market of loans to businesses with revenues of \$1 million or less. BOK's market share of 20% is slightly higher than its overall market share.

Muskogee Region

BOK's lending to businesses with revenues of \$1 million or less is good. Approximately 77% of the reportable loans made were to businesses of this revenue size. This is significantly higher than the originations made by all other lenders in the assessment area to small businesses. A very high percentage of the bank's small business loan originations were in amounts of \$100,000 or less.

The 1997 market share data reflects that BOK ranks third in loans to businesses with revenues of \$1 million or less and made significantly fewer loans than the market leaders. BOK's market share of 20% is similar to its overall market share.

The table also presents the percentage distribution of the number of loans originated by the **Kay County Region**

BOK is not a significant small business lender in this area. The 1997 market share data shows that BOK made five loans to businesses with revenues of \$1 million or less. This volume is similar to the overall market share. The market leader garnered more than 50% of this market.

BOK made one half of its small business loans to businesses with revenues of \$1 million or less. This is substantially lower than the potential opportunities in the area as 93% of the businesses meet this revenue criteria. However, this is a slightly higher percentage than the rest of the lenders in the market. A substantial majority of the small business loans were in amounts of \$100,000 or less.

Small Farm Loans

Refer to Table 11 in the Appendix C for the facts and data about the borrower distribution of the bank's small farm loan originations.

A detailed analysis of the borrower distribution of loans to small farms is not included in this evaluation because this type of lending is not a significant part of the bank's business strategy. The volume of loans to small farms made during the evaluation period is not significant or sufficient for meaningful analysis.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

Tulsa MSA

BOK has made an adequate level of community development loans within the Tulsa MSA assessment area. Seven community development loans totaling \$1.7 million have been originated or purchased in 1997 and 1998. All of the loans benefited the Tulsa MSA assessment area. Four loans totaling \$1.4 million are for the purchase and/or rehabilitation of affordable housing primarily for low- and moderate-income individuals. Two loans totaling \$30 thousand are to agencies providing qualified services primarily to low- and moderate-income individuals/families. One loan for \$140 thousand was part of an effort to revitalize a neighborhood in a low-income geography. BOK has made a line of credit available for small business lending through the Oklahoma Capital Access Program, of which \$115 thousand is attributed to the Tulsa MSA assessment area.

Oklahoma City MSA

BOK has a good level of community development loans within the Oklahoma City MSA assessment area. Three community development loans totaling \$5.1 million have been originated in 1997 and 1998. Two of the loans totaling \$4.7 million were for rehabilitating affordable housing primarily for low- and moderate-income persons. One loan of \$353 thousand is a pro-rata share of a line of credit that facilitates small business lending in Oklahoma through the Oklahoma Capital Access Program.

Enid MSA

BOK has made an adequate level of community development loans within the Enid MSA assessment area. Two community development loans totaling \$457 thousand have been originated in 1997 and 1998. One loan of \$425 thousand was to refinance the mortgage on a low-income housing apartment complex. The other loan of \$32 thousand is a pro-rata share of a line of credit that facilitates small business lending in Oklahoma through the Oklahoma Capital Access Program.

Northeast Oklahoma Region

BOK has made no community development loans in this region in 1997 and 1998.

Muskogee Region

BOK has made an adequate level of community development loans within the Muskogee Region assessment area. Two community development loans totaling \$161 thousand were originated in 1997 and 1998. A \$150 thousand loan was utilized to renovate an affordable housing facility specifically for low- and moderate-income senior citizens.

Kay County

BOK has made an adequate level of community development loans within the Kay County assessment areas. Two community development loans totaling \$1.3 million were originated in 1997 and 1998. A \$1.2 million loan is part of a local economic development plan to create jobs.

Product Innovation and Flexibility

BOK has developed two innovative and/or flexible loan products to address affordable home mortgage needs (Zero-down Advantage Plus) and small business loan needs (Small Business Banking Express).

Zero-down Homeward Bound - Adjustable Rate Mortgage Product

Originally introduced in November 1993, this program has now been terminated. Nonetheless, during the evaluation period, BOK originated 57 loans, totaling \$2.3 million, under this program. The program has been targeted to low- and moderate-income borrowers or properties in low- or moderate-income census tracts and features 100% financing with no origination fees. Interest rate adjustments are limited, and no private mortgage insurance has been required.

Zero-down Advantage Plus - Fixed Rate Mortgage Product

Similar to the Homeward Bound Program in intent and features, this program was introduced in June 1997. BOK has originated 52 loans totaling \$2.2 million.

Small Business Express

This is a simplified small business loan product first offered by BOK in 1998. Requests receive same-day decisions, and several options are available for the structure of the credit made available. BOK has originated 485 loans totaling \$15.9 million under this program.

Brady Heights

BOK participated in the construction loan for a speculative house in the Brady Heights neighborhood in North Tulsa. This home is constructed by the Brady Heights Neighborhood Association, in a compatible architectural style, as part of its revitalization and stabilization efforts. This is the first new construction in the neighborhood in more than fifty years. At this writing, the house, nearing completion, is under contract for purchase at its asking price.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Tulsa MSA is adequate, in the Oklahoma City MSA excellent, in the Enid MSA, Northeastern Oklahoma Region and Muskogee Region poor, and in the Kay County Region good.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Qualified investments are investments, deposits, membership shares, or grants that have as their primary purpose "community development" as defined in the CRA regulation. BOK has made 99 qualified investments totaling \$12.3 million during the evaluation period. The investments are distributed throughout the six assessment areas with the vast majority (99%) in the Tulsa and Oklahoma City MSAs. This compares with 88% of BOK's deposits which come from those assessment areas.

The majority of the dollar amount of investments is used to finance affordable housing projects. BOK has purchased two LIHTCs totaling \$5.8 million on multi-family properties in the Oklahoma City MSA. It has also developed a program to purchase pools of affordable housing mortgages in its assessment areas. The bank is able to identify and select the underlying mortgages by the census tract/BNA information. BOK has purchased three of these issues to date totaling \$1.4 million, with plans to purchase similar issues on a monthly basis. The bank has also purchased one other FNMA affordable housing issue used to finance an apartment complex in the Oklahoma City MSA in the amount of \$2.3 million.

The majority of the number of investments consists of grants, which have been extended in all assessment areas to organizations that promote community development, as defined. Examples include: groups promoting affordable housing, battered women's shelters, and various other groups which provide health, economic, and general welfare assistance to low- and moderate-income individuals/families.

Although the bank has an adequate level of qualified community development grants and investments in the Tulsa, Oklahoma City, and Kay County assessment areas, investments in the Enid, Northeastern Oklahoma, and Muskogee areas are not strong.

Tulsa MSA

BOK has provided 33 qualified investment/grants in the Tulsa MSA assessment area totaling \$1.7 million. Investments include the purchase of three FNMA affordable housing bonds of \$1.1 million. The bank also has deposits of \$200,000 in a minority-owned bank that primarily lends in low- and moderate-income areas or individuals. Additionally, grants have been provided to numerous not-for-profit organizations which primarily provide community services to low- and moderate-income individuals and groups throughout the Tulsa MSA assessment area. Examples of these are the selected activities of the Tulsa Area United Way, the Salvation Army, and the IDA Program of the Community Action Project of Tulsa County.

Oklahoma City MSA

BOK has provided 42 qualified investments/grants in the Oklahoma City MSA assessment area totaling \$10.5 million. Investments include the purchase of four FNMA affordable housing bonds at \$4.5 million and two LIHTCs at \$5.8 million. The bank also has deposits of \$100 thousand in a minority-owned bank that primarily serves low- and moderate-income individuals. Additionally, grants have

been provided to not-for-profit organizations throughout the Oklahoma City MSA assessment area which serve the needs of the low- and moderate-income individuals/groups. These groups include selected services of the United Way of Metro Oklahoma City, United Way of Norman, City Rescue Mission, and the Oklahoma City Food Bank.

Enid MSA

BOK has provided nine qualified investments/grants in the Enid MSA assessment area totaling \$9,000. Investments/grants are below what would be anticipated based upon the volume of deposits and loans provided from this area. All qualified investments are grants to not-for-profit organizations in the Enid MSA assessment area which serve the needs of the low- and moderate-income individuals/groups. These groups include the Enid YWCA and the Enid/Garfield County Development Alliance.

Northeastern Oklahoma Region/Muskogee Region/Kay County Region

BOK has provided 15 qualified investments/grants in these three assessment areas totaling \$128 thousand. These include the purchase of one FNMA affordable housing bond with \$117 thousand applicable to the Kay County Region. The remainder are grants to not-for-profit organizations throughout these areas which serve the needs of low- and moderate-income individuals/groups. Although Kay County Region has an adequate level of investments, the Muskogee and Northeastern Oklahoma Regions have little investment activity and need improvement.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in all assessment areas is adequate. All services are at least reasonably accessible to individuals and geographies of different income levels within its assessment areas.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

Tulsa MSA

Branch offices and ATMs in the Tulsa MSA are located predominantly in middle- and upper-income census tracts. While not altogether inconsistent with the distribution of the population, moderate income tracts, especially, appear to be disadvantaged. Nonetheless, an evaluation of the locations of the branches and ATMs indicates them to be reasonably accessible throughout the area. Openings and closings during the evaluation period have had no adverse impact, as all have been in middle- and upper-income census tracts. These changes have consisted of replacement of free-standing branches with full-service in-store branches.

Oklahoma City MSA

As in Tulsa, branch offices and ATMs in Oklahoma City are predominantly in middle- and upper-income census tracts. Provision of ATM locations to low- and moderate-income areas is consistent with the population distribution and compensates to some extent for a shortage of branch offices in those areas. Openings and closings of branches have had no adverse impact. All were in middle- and upper-income areas, save for one opening in a moderate-income census tract. All openings have been full-service in-store branches.

Enid MSA/Northeastern Oklahoma Region/Muskogee Region/Kay County Region

These communities are smaller, and BOK's relatively limited operations make an evaluation of branch and ATM locations less meaningful. There are only fifteen branches and twenty ATMs in all four areas. Locations are reasonably consistent with the distribution of the population in all areas.

Alternative Delivery Systems

In all of its communities, BOK has available several alternative delivery systems for certain of its products and services. These include the use of postal services, telephone, and internet services for access. The Express Banking system allows twenty-four hour access for both loan and deposit services. None of these services is especially innovative, but all expand the opportunity for conducting business with BOK without traveling to a branch office or ATM. The services are readily available to and beneficial for low- and moderate-income individuals.

Community Development Services

BOK has an adequate level of community development services. These services (some of which are described below) have provided benefit primarily to low- and

moderate-income persons in the bank's six assessment areas on an on-going basis during the evaluation period. Community development services include providing technical assistance on financial matters to not-for profit organizations which serve low- and moderate-income individuals/families and to other groups or small businesses that promote community revitalization, community development, or affordable housing. BOK also provides financial planning to individuals/groups and provides home ownership counseling to individuals/groups, primarily focusing upon those in low- and moderate-income circumstances or neighborhoods. All of these services benefit the bank's assessment areas. The following are some examples of these services:

IDA Matched Savings Program - BOK administers two programs designed to assist low-income individuals by matching eligible participants' deposits with funds targeted for a community development purpose. The Cherokee Nation IDA program helps tribal members with down payments to purchase affordable housing. The Community Action Project of Tulsa County IDA program helps low-income individuals with funds for home ownership, business development, education and training, or retirement.

Homebuyer Education Programs - BOK officers are active in providing home ownership counseling and financial planning to low- and moderate-income persons. This is conducted through either homebuyer seminars/fairs or officer participation on the boards of affordable housing related organizations. These organizations include the Homelife Association, Housing Partners of Tulsa, Housing Assistance Corporation, Habitat for Humanity, and the Norman Housing Authority.

Small Business Seminars - BOK employees provide technical expertise on small business issues throughout the assessment areas. This is primarily accomplished through seminars focused on small business loan and deposit products and investment services available through the bank. The seminars are also used to discuss SBA lending and the development of business plans. Minority and women's organizations are targeted for presentations given outside bank premises.

Credit and Financial Counseling - BOK employees sit on the boards of several organizations providing credit and financial counseling for low- and moderate-income groups. Organizations include: Credit Counseling Centers of Oklahoma, Norman Community Reinvestment Council, and the Mid Del Group Home. Employees also sit on the boards of organizations providing small businesses with credit and financial counseling assistance. These organizations include: Metro Area Development Corporation and Verdarka.

Not-for-Profit Assistance - Through board or committee participation, many BOK employees provide technical expertise to not-for-profit organizations providing community development services for low- and moderate-income groups. These not-for-profit organizations include: Oklahoma City Helpline, Education and Employment Ministries, Oklahoma City Boys and Girls Clubs, Special Care, The Center for Non-Profit Management, Community Child Care Center, Christmas in April, Newkirk Community Chest, Ponca City Home Economics Project, and the Ponca City Economic Advisory Board.

Community Spirit Program - This program was designed and developed by BOK to provide financial services for low- and moderate-income families and small business throughout the communities it serves. These services include low-cost basic checking accounts and no-fee and no-minimum balance savings accounts. The program also includes various home purchase, home improvement, and small business loans tailored to meet the needs of low- and moderate-income individuals/families and small businesses. Results of these have been recognized, as applicable, in the lending test evaluation.

Banking Basics - A program for presentation to community groups that summarizes basic banking services and provides information on learning to manage a checking account, how to establish a budget, how to apply for a loan, the importance of credit, small business financing, and a small business question and answer forum. This service is free of charge and is held at a time and location convenient to the group requesting the presentation.

Access Oklahoma ATM Services - Access Oklahoma Cards are "money cards" issued by the State of Oklahoma to persons receiving certain types of public assistance. ATM access is required to obtain these funds. BOK has modified its ATMs to accept these cards and does not charge its usual terminal fee to users of these cards.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope") and those that received a less comprehensive review (designated by the term "Limited-Scope").

Time Period Reviewed	Lending Test: January 3, 1997 to December 28, 1998 Investment Test: October 22, 1997 to April 5, 1999 Service Test: October 22, 1997 to April 5, 1999	
Financial Institution	Products Reviewed	
Bank of Oklahoma, N. A. (BOK) Tulsa, Oklahoma	Home purchase and refinance mortgage loans, home improvement loans, small business loans, community development loans, community development investments, retail and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Tulsa (MSA 8560) Oklahoma City (MSA 5880) Enid (MSA 2340) Muskogee Region (McIntosh, Muskogee, and Pittsburg Counties) Northeastern Oklahoma Region (Craig, Delaware, Mayes, Nowata, Ottawa, and Washington Counties) Kay County Region	Full-Scope Full-Scope Full-Scope Full-Scope Full-Scope Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

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TULSA MSA

Demographic Information for Full-Scope Area: Tulsa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	207	5.31	25.60	43.97	24.15	0.97
Population by Geography	708,594	4.00	22.44	50.04	23.52	0.00
Owner-Occupied Housing by Geography	181,730	2.38	21.10	51.27	25.25	0.00
Businesses by Geography	28,921	2.91	25.78	45.58	25.73	0.00
Farms by Geography	580	2.93	21.21	51.72	24.14	0.00
Family Distribution by Income Level	195,735	20.32	17.70	22.18	39.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	74,424	6.54	33.56	49.59	10.31	0.00
Median Family Income	= \$32,578	Median Housing Value				= \$61,222
HUD Adjusted Median Family Income for 1998	= \$41,400	Unemployment Rate (1997)				= 3.5%*
Households Below the Poverty Level	= 13.26%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates 23 full-service branch offices and 132 automated teller machines in the Tulsa MSA. Three of the branch offices are located in low-income census tracts and one is located in a moderate-income tract. This assessment area consists of five counties that account for approximately 64% of BOK's total assessment area deposit base. These counties include Creek, Osage, Rogers, Tulsa, and Wagoner. Tulsa County is the highest populated county in this MSA, with a 1996 estimated population* of 531,600 (75% of the MSA). Significant loan and deposit competitors in the Tulsa MSA include, but are not limited to, Nations Bank, Bank One, State Bank and Trust, and F & M Bank & Trust.

Lender market share reports for 1997 show that BOK obtained the largest shares in the Tulsa MSA for small business (17%) and residential real estate (9%) lending activities. These percentages are consistent with other market share reports that show BOK maintains slightly less than 52% of all loans outstanding in the Tulsa MSA. A June 30, 1998, deposit market share report from the FDIC indicates that BOK maintains the highest percentage of deposits in the Tulsa MSA, with 26%.

Approximately 29% of the households in the Tulsa MSA receive public assistance or social security. Slightly less than 89% of the total housing units are occupied, and approximately 58% are owner-occupied.

According to 1997 economic data obtained from the Oklahoma Department of Commerce, the labor force in the Tulsa MSA is estimated to be 357,165, with an unemployment rate of 3.5%. The economy is strong and generally diverse. Aerospace, telecommunications, energy, health care, and retail services remain dominant industries.

OKLAHOMA CITY MSA

Demographic Information for Full-Scope Area: Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	324	6.79	26.54	38.89	22.53	5.25
Population by Geography	958,839	3.71	24.73	44.47	26.96	0.13
Owner-Occupied Housing by Geography	236,478	2.35	21.40	46.55	29.70	0.00
Businesses by Geography	34,627	5.54	27.48	39.84	24.25	0.00
Farms by Geography	723	2.63	23.51	44.95	28.22	0.00
Family Distribution by Income Level	257,571	20.07	17.73	22.79	39.41	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	97,370	6.85	35.12	44.58	13.45	0.00
Median Family Income	= \$32,406	Median Housing Value		= \$55,280		
HUD Adjusted Median Family Income for 1998	= \$41,300	Unemployment Rate (1997)		= 3.3%*		
Households Below the Poverty Level	= 13.68%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates 24 full-service branches, two limited-service branches, and 145 automated teller machines in the Oklahoma City MSA. Two of the branch offices (one is a limited-service branch) are located in low-income census tracts, and one is located in a moderate-income census tract. This assessment area consists of six counties that account for approximately 22% of BOK's total assessment area deposit base. These counties are Canadian, Cleveland, Logan, McClain, Oklahoma, and Pottawatomie. Oklahoma County is the most populous county in the MSA, with a 1996 estimated population* of 630,5301 (66% of the MSA). Significant loan and deposit competitors in the Oklahoma City MSA include MidFirst Bank, Bank One, Nations Bank, and Local Oklahoma Bank. Approximately 28% of the households in the MSA receive public assistance or social security. Slightly less than 87% of the total housing units are occupied and approximately 56% are owner-occupied.

According to 1997 economic data from the Oklahoma Department of Commerce, the labor force in the Oklahoma City MSA is estimated to be 526,680, with an unemployment rate of 3.3%. The economy is strong and generally diverse. State government, military, telecommunications, health care, education, and retail services are dominant industries.

Lender market share reports for 1997 show that BOK obtained the seventh highest market share in the MSA for small business lending (6%), and the third highest for residential real estate lending (4%). The June 30, 1998, FDIC market

share report indicates BOK maintains the fourth highest percentage of deposits in the MSA, with 7%.

ENID MSA

Demographic Information for Full-Scope Area: Enid MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	12	0.00	25.00	66.67	8.33	0.00
Population by Geography	56,735	0.00	26.38	52.72	20.90	0.00
Owner-Occupied Housing by Geography	15,522	0.00	23.96	53.12	22.92	0.00
Businesses by Geography	2,149	0.00	38.95	44.62	16.43	0.00
Farms by Geography	65	0.00	9.23	70.77	20.00	0.00
Family Distribution by Income Level	15,917	18.74	18.75	24.38	38.13	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,967	0.00	36.18	51.85	11.97	0.00
Median Family Income	= \$28,220	Median Housing Value		= \$37,160		
HUD Adjusted Median Family Income for 1998	= \$35,300	Unemployment Rate (1997)		= 3.2%*		
Households Below the Poverty Level	= 14.88%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates two full-service branch offices and four automated teller machines in this rural area of North Central Oklahoma. This assessment area consists of Garfield County, which accounts for approximately 2% of BOK's total assessment area deposit base. The population of this county, estimated at 57,000, is centered in the city of Enid with a 1990 population of more than 45,000.

According to 1997 economic data from the Oklahoma Department of Commerce, the local economy is generally diverse, although military and aviation related services appear to dominate the workforce. The labor force in the Enid MSA is approximately 28,000, with an unemployment rate of 3.2%. Approximately 36% of the number of households in the MSA receive public assistance or social security. Approximately 85% of the total housing units are occupied and 59% are owner-occupied.

Lender market share reports for 1997 indicated BOK, during 1997, obtained the highest market share percentage in the Enid MSA for residential real estate lending (11%), and small business lending (34%). The June 30, 1998, FDIC market share report indicates BOK maintains the sixth largest percentage of deposits in the Enid MSA, with 8%.

Local banking competition is high, as Garfield County's financial services are provided by eleven banks and at least one credit union. Central National Bank and Trust Company of Enid and The Security National Bank of Enid are the two largest,

locally-owned banks in the county, and are BOK's primary loan and deposit competitors.

The economic conditions in the Enid MSA are considered stable. Dominant employers in the MSA include Vance Air Force Base, Northrop Worldwide Aircraft Services, Enid Public Schools, and the Enid Community Correction Center.

NORTHEASTERN OKLAHOMA REGION

Demographic Information for Full-Scope Area: Northeastern Oklahoma Region						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	47	0.00	10.64	68.08	21.28	0.00
Population by Geography	164,159	0.00	9.69	64.98	25.33	0.00
Owner-Occupied Housing by Geography	48,834	0.00	9.00	65.54	25.46	0.00
Businesses by Geography	4,780	0.00	14.00	71.27	14.73	0.00
Farms by Geography	169	0.00	5.33	72.78	21.89	0.00
Family Distribution by Income Level	47,698	18.63	17.31	20.13	43.93	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	17,107	0.00	12.61	72.88	14.51	0.00
Median Family Income	= \$24,139	Median Housing Value		= \$40,963		
HUD Adjusted Median Family Income for 1998	= \$31,300	Unemployment Rate (1997)		= 4.7%*		
Households Below the Poverty Level	= 17.83%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates six full-service branch offices and nine automated teller machines in the NEO region. This assessment area consists of six counties (Craig, Delaware, Mayes, Nowata, Ottawa, and Washington) that account for approximately 5% of BOK's total assessment area deposit base. Washington County is the most populous in the region, with a 1996 estimated population* of 47,000 (29% of the MSA). Delaware County, with a 1996 estimated population* of 33,000, is one of the fastest growing counties in Oklahoma, with this growth centered in a retirement population in the community of Grove.

Loan and deposit competition is generally aggressive. Significant competitors include, but are not limited to Westar Bank, Grand Federal Savings Bank, Grand Lake Bank, Local Oklahoma Bank, and First National Bank of Grove.

According to 1997 economic data obtained from the Oklahoma Department of Commerce, the NEO Region's economy is heavily influenced by the agriculture and water recreation industries, although the petroleum industry remains vital to employment, particularly in Washington County. The labor force is estimated at 76,000, with a six-county average unemployment rate of 4.7%. Approximately 43% of the households in the region receive public assistance or social security. About 82% of the total housing units are occupied, and 62% are owner-occupied.

Lender market share reports for 1997 show that BOK obtained the fourth highest share in the NEO region for residential real estate lending (6%) and the second

highest share of small business lending (16%). The June 30, 1998, FDIC market share report indicates BOK maintains the second highest percentage of deposits in the region, with 11%.

The economic conditions in the region are generally stable, although depressed oil prices continue to affect adversely the energy industry. Major employers in the region include Phillips Petroleum Company, Eastern State Hospital, Bartlesville Educational System, Jane Phillips Medical Center, Grede-Pryor, Inc., and Simmons Industries.

MUSKOGEE REGION

Demographic Information for Full-Scope Area: Muskogee Region						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	42	2.38	21.43	47.61	14.29	14.29
Population by Geography	125,438	0.49	26.73	52.72	20.06	0.00
Owner-Occupied Housing by Geography	34,876	0.24	25.83	54.13	19.80	0.00
Businesses by Geography	3,859	9.02	30.37	44.80	15.81	0.00
Farms by Geography	125	0.80	32.80	49.60	16.80	0.00
Family Distribution by Income Level	34,834	23.20	17.32	19.61	39.87	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,115	0.40	33.91	53.75	11.94	0.00
Median Family Income	= \$24,139	Median Housing Value		= \$38,460		
HUD Adjusted Median Family Income for 1998	= \$31,100	Unemployment Rate (1997)		= 6.9%*		
Households Below the Poverty Level	= 22.03%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates five full-service branch offices and six automated teller machines in the Muskogee Region. One of these branches is located in a moderate-income census tract. This assessment area consists of three counties (McIntosh, Muskogee, and Pittsburg) and accounts for approximately 6% of BOK's total assessment area deposit base. Muskogee County is the most populous, with an estimated 1996 population* of slightly more than 69,000 (55% of the region).

Significant deposit and loan competitors in the region include BancFirst, First National Bank and Trust Company of McAlester, and First National Bank and Trust Company of Muskogee (FNBM). On December 30, 1998, BOKF agreed in principle to purchase FNBM and its parent company. Completion of this acquisition is pending regulatory approval.

According to 1997 data obtained from the Oklahoma Department of Commerce, the local economy is based primarily upon agriculture, although manufacturing remains vital to local employment. The labor force totals slightly more than 55,000, with a three-county average unemployment rate of 6.9%. Approximately 46% of the households in this region received public assistance or social security. Approximately 81% of the total housing units are occupied, and 59% are owner-occupied.

Lender market share reports for 1997 show that BOK obtained the fourth highest market share in the region for residential real estate lending (7%) and the second

highest percentage for small business lending (16%). The June 30, 1998, FDIC market share report shows that BOK maintains the third highest percentage of deposits in the region, with 19%.

Economic conditions are generally stable. Significant employers include Fort Howard Paper Company, U. S. Army Ammunition Plant, Acme Engineering and Manufacturing, and the McAlester Regional Health Center.

KAY COUNTY REGION

Demographic Information for Full-Scope Area: Kay County Region						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	11	0.00	0.00	54.55	45.45	0.00
Population by Geography	48,056	0.00	0.00	51.15	48.85	0.00
Owner-Occupied Housing by Geography	13,914	0.00	0.00	50.45	49.55	0.00
Businesses by Geography	1,788	0.00	0.00	57.94	42.06	0.00
Farms by Geography	56	0.00	0.00	73.20	26.80	0.00
Family Distribution by Income Level	13,519	14.06	14.19	19.49	52.26	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,820	0.00	0.00	67.07	32.93	0.00
Median Family Income	= \$24,139	Median Housing Value		= \$42,992		
HUD Adjusted Median Family Income for 1998	= \$31,100	Unemployment Rate (1997)		= 7.0%*		
Households Below the Poverty Level	= 13.78%					

Source: 1990 U.S. Census and 1998 HUD updated MFI. * Source: Okla. Dept. Of Commerce

BOK operates two full-service branch offices and one automated teller machine in this rural area of North Central Oklahoma. This assessment area consists of Kay County, which accounts for only 1% of BOK's total assessment area deposit base. The population of this county, estimated at 48,000, is centered in Ponca City, with a 1990 population of more than 26,000. In addition to BOK, local banking services are provided by five banks and one credit union. These competitors include Pioneer Bank, Home National Bank, Commercial Federal Bank, Nations Bank, and First National Bank of Oklahoma.

According to 1997 economic data obtained from the Oklahoma Department of Commerce, the local economy is centered in the energy industry. The labor force is listed at 22,250, with an unemployment rate of 7%. Slightly more than 40% of the households in the region received public assistance or social security. Approximately 85% of the total housing units are occupied and 62% are owner-occupied. Dominant employers include Conoco, Inc., Thorn Apple Valley, Sykes, and Air Systems Components.

Lender market share reports for 1997 show BOK to have the second highest market share in the region for residential real estate lending (8%). The June 30, 1998, FDIC market share report reveals that BOK maintains the fifth highest percentage of deposits in the region, with 7%.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME													State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
TULSA MSA	64%	7,033	\$618,007	2,197	\$250,914	27	\$897	7	\$1,660	9,264	\$871,478	52.51%				
OKLAHOMA CITY MSA	22%	4,225	\$326,976	1,370	\$173,216	20	\$813	3	\$5,087	5,618	\$506,092	31.85%				
ENID MSA	2%	722	\$42,428	73	\$6,745	14	\$426	2	\$457	811	\$50,056	4.60%				
NORTHEASTERN OKLAHOMA REGION	5%	578	\$40,213	253	\$22,358	22	\$141	0	\$0	811	\$62,712	4.84%				
MUSKOGEE REGION	6%	369	\$15,613	423	\$32,859	66	\$1,674	2	\$161	860	\$50,307	4.88%				
KAY COUNTY REGION	1%	200	\$11,965	27	\$4,043	6	\$35	2	\$1,289	235	\$17,332	1.33%				
Limited-Scope:																

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE																State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
TULSA MSA	3%	0%	21%	7%	51%	45%	25%	48%	1	12.12	4.08	7.93	11.04	15.30	4,154	52%			
OKLAHOMA CITY MSA	2%	1%	21%	9%	47%	43%	30%	47%	1	6.34	3.64	4.37	6.73	6.75	2,816	35%			
ENID MSA	0%	0%	24%	23%	53%	41%	23%	36%	1	15.01	NA	13.94	14.47	16.77	491	6%			
NORTHEASTERN OKLAHOMA REGION	0%	0%	9%	3%	66%	64%	25%	33%	2	8.40	NA	5.19	9.31	7.63	307	4%			
MUSKOGEE REGION	< 1%	0%	26%	16%	54%	53%	20%	31%	6	4.70	0.00	3.64	5.53	4.21	124	2%			
KAY COUNTY REGION	0%	0%	0%	0%	50%	25%	50%	75%	1	14.71	NA	NA	8.20	17.19	145	2%			
Limited-Scope:																			

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
TULSA MSA	3%	1%	21%	15%	51%	41%	25%	43%	2	12.16	14.6	9.37	10.22	16.72	791	49%			
OKLAHOMA CITY MSA	2%	0%	21%	15%	47%	43%	30%	42%	5	6.03	0.00	4.23	5.78	7.93	480	30%			
ENID MSA	0%	0%	24%	20%	53%	49%	23%	31%	2	15.43	NA	14.29	14.97	18.87	84	5%			
NORTHEASTERN OKLAHOMA REGION	0%	0%	9%	4%	66%	66%	25%	30%	2	14.78	NA	6.25	20.00	8.76	101	6%			
MUSKOGEE REGION	< 1%	0%	26%	32%	54%	48%	20%	20%	2	22.09	0.00	33.33	21.18	15.56	129	8%			
KAY COUNTY REGION	0%	0%	0%	0%	50%	57%	50%	43%	3	10.84	NA	NA	11.11	10.34	14	1%			
Limited-Scope:																			

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																	State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
TULSA MSA	3%	0%	21%	4%	51%	38%	25%	58%	1	7.31	3.57	3.68	5.74	11.20	2,088	60%				
OKLAHOMA CITY MSA	2%	0%	21%	5%	47%	38%	30%	57%	10	1.97	0.00	1.00	1.71	2.75	929	27%				
ENID MSA	0%	0%	24%	7%	53%	41%	23%	52%	3	6.30	NA	4.17	5.10	9.93	147	4%				
NORTHEASTERN OKLAHOMA REGION	0%	0%	9%	3%	66%	59%	25%	38%	3	7.43	NA	3.57	5.88	11.37	170	5%				
MUSKOGEE REGION	< 1%	0%	26%	19%	54%	44%	20%	37%	4	10.76	0.00	9.09	11.34	10.91	116	3%				
KAY COUNTY REGION	0%	0%	0%	0%	50%	20%	50%	80%	6	6.67	NA	NA	5.08	7.69	41	1%				
Limited-Scope:																				

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																	State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans					
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
TULSA MSA	3%	2%	26%	20%	45%	38%	26%	40%	1	17.36	13.47	15.36	15.97	20.40	2,197	50%				
OKLAHOMA CITY MSA	6%	5%	28%	14%	40%	38%	24%	40%	7	6.67	5.24	3.52	6.40	9.53	1,370	31%				
ENID MSA	NA	NA	38%	19%	44%	52%	16%	29%	2	19.47	NA	10.53	24.44	20.93	73	2%				
NORTHEASTERN OKLAHOMA REGION	NA	NA	14%	11%	71%	58%	15%	31%	2	16.10	NA	13.98	15.26	18.59	253	6%				
MUSKOGEE REGION	9%	14%	30%	28%	45%	35%	16%	23%	3	18.48	44.26	22.83	13.11	19.53	423	10%				
KAY COUNTY REGION	NA	NA	NA	NA	58%	33%	42%	67%	5	5.15	NA	NA	4.81	5.56	27	1%				
Limited-Scope:																				

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM State: OKLAHOMA Evaluation Period: JANUARY 31, 1997 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
TULSA MSA	3%	0%	21%	33%	52%	63%	24%	4%	3	13.45	0.00	12.24	16.36	6.67	27	17%
OKLAHOMA CITY MSA	3%	0%	24%	5%	45%	60%	28%	35%	3	3.89	0.00	0.90	4.70	7.81	20	13%
ENID MSA	NA	NA	9%	14%	71%	79%	20%	7%	1	52.94	NA	100	53.85	33.33	14	9%
NORTHEASTERN OKLAHOMA REGION	NA	NA	5%	9%	73%	36%	22%	55%	5	5.29	NA	1.82	3.42	23.08	22	14%
MUSKOGEE REGION	1%	0%	33%	24%	49%	56%	17%	20%	3	13.36	0.00	7.27	14.89	15.15	66	43%
KAY COUNTY REGION	NA	NA	NA	NA	73%	100%	27%	0%	2	8	NA	NA	14	0.00	56	36%
Limited-Scope:																

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																
State: OKLAHOMA																
Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
TULSA MSA	20%	4%	18%	16%	22%	25%	40%	55%	1	12.12	9.26	9.46	12.17	17.95	4,112	52%
OKLAHOMA CITY MSA	20%	7%	18%	22%	23%	27%	39%	44%	1	6.34	6.20	6.80	7.91	7.95	2,793	35%
ENID MSA	19%	15%	19%	27%	24%	23%	38%	35%	1	15.01	17.7	16.67	17.16	14.29	488	6%
NORTHEASTERN OKLAHOMA REGION	19%	2%	17%	10%	20%	19%	44%	69%	2	8.40	5.41	6.07	6.80	10.66	300	4%
MUSKOGEE REGION	23%	6%	17%	10%	20%	17%	40%	67%	6	4.70	2.86	3.24	3.30	8.01	123	2%
KAY COUNTY REGION	14%	2%	14%	23%	20%	23%	52%	52%	1	14.71	6.25	21.74	20.59	13.64	145	2%
Limited-Scope:																

(*) As a percentage of loans with borrower income information available. No information was available for 5% of loans originated by BOK.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Improvement Loans					
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
TULSA MSA	20%	8%	18%	14%	22%	22%	40%	56%	2	12.16	9.70	9.67	9.65	14.45	739	50%				
OKLAHOMA CITY MSA	20%	8%	18%	17%	23%	23%	39%	52%	5	6.03	3.56	3.68	5.24	8.02	438	30%				
ENID MSA	19%	8%	19%	16%	24%	20%	38%	56%	2	15.43	10.40	12.28	14.29	19.13	79	5%				
NORTHEASTERN OKLAHOMA REGION	19%	6%	17%	21%	20%	15%	44%	58%	2	14.78	13.16	13.24	14.47	14.36	94	6%				
MUSKOGEE REGION	23%	9%	17%	18%	20%	18%	40%	55%	2	22.09	17.95	23.08	10.45	24.34	112	8%				
KAY COUNTY REGION	14%	0%	14%	0%	20%	8%	52%	92%	3	10.84	0.00	0.00	0.00	18.75	12	1%				
Limited-Scope:																				

(*) As a percentage of loans with borrower income information available. No information was available for 5% of loans originated by BOK.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																State: OKLAHOMA		Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans				
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
TULSA MSA	20%	2%	18%	9%	22%	19%	40%	70%	1	7.31	4.25	4.89	5.99	10.94	1,868	61%			
OKLAHOMA CITY MSA	20%	4%	18%	12%	23%	18%	39%	66%	10	1.97	1.49	1.21	1.47	3.27	756	25%			
ENID MSA	19%	5%	19%	13%	24%	20%	38%	62%	3	6.30	6.52	6.85	6.19	7.56	135	4%			
NORTHEASTERN OKLAHOMA REGION	19%	1%	17%	8%	20%	18%	44%	73%	3	7.43	0.00	6.25	5.95	9.13	164	5%			
MUSKOGEE REGION	23%	2%	17%	11%	20%	24%	40%	63%	4	10.76	5.56	9.86	12.17	13.10	109	4%			
KAY COUNTY REGION	14%	0%	14%	10%	20%	18%	52%	72%	6	6.67	0.00	23.08	8.33	5.06	39	1%			
Limited-Scope:																			

(*) As a percentage of loans with borrower income information available. No information was available for 5% of loans originated by BOK.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS State: OKLAHOMA Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998											
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
TULSA MSA	90%	57%	55%	63.68%	26.44%	9.88%	17.36	17.21	2,197	50%	\$114
OKLAHOMA CITY MSA	90%	63%	60%	67.67%	18.83%	13.50%	6.67	6.51	1,370	31%	\$126
ENID MSA	91%	90%	48%	72.60%	19.18%	8.22%	19.47	29.52	73	2%	\$92
NORTHEASTERN OKLAHOMA REGION	93%	86%	68%	75.89%	14.23%	9.88%	16.10	19.94	253	6%	\$88
MUSKOGEE REGION	91%	77%	69%	78.49%	14.18%	7.33%	18.48	19.78	423	10%	\$78
KAY COUNTY REGION	93%	50%	47%	62.96%	22.22%	14.82%	5.15	5.49	27	1%	\$150
Limited-Scope:											

(*) As a percentage of businesses with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for 14% of loans originated by BOK.
 (***) The market consists of all other Small Business reporters in BOK's assessment area and is based on 1997 Aggregate Small Business Data only.
 (****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: OKLAHOMA Evaluation Period: JANUARY 1, 1997 TO DECEMBER 31, 1998											
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
TULSA MSA	98%	56%	87%	92.59%	7.41%	0.00%	13.45	15.09	27	17%	\$30
OKLAHOMA CITY MSA	97%	25%	85%	100.00%	0.00%	0.00%	3.89	4.53	20	13%	\$41
ENID MSA	97%	71%	50%	92.86%	7.14%	0.00%	52.94	69.23	14	9%	\$33
NORTHEASTERN OKLAHOMA REGION	97%	86%	92%	100.00%	0.00%	0.00%	5.29	5.74	22	14%	\$6
MUSKOGEE REGION	100%	73%	81%	95.45%	3.03%	1.52%	13.36	15.98	66	43%	\$25
KAY COUNTY REGION	98%	33%	76%	100.00%	0.00%	0.00%	7.55	9.76	6	4%	\$6
Limited-Scope:											

(*) As a percentage of farms with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for 36% of loans originated by BOK.
 (***) The market consists of all other Small Farm reporters in BOK's assessment area and is based on 1997 Aggregate Small Farm Data only.
 (****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Oklahoma Evaluation Period: October 22,1997 TO April 12, 1999									
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Tulsa MSA				33	1,653		33	1,653	13.46
Oklahoma City MSA				42	10,489		42	10,489	85.42
Enid MSA				9	9		9	9	.07
Northeast Oklahoma Region				7	3		7	3	.02
Muskogee Region				4	8		4	8	.06
Kay County Region				4	118		4	118	.96
Limited-Scope:									

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.
(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
State: OKLAHOMA																	
Evaluation Period: OCTOBER 27, 1997 TO APRIL 5, 1999																	
MSA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
TULSA MSA	64%	23	36%	13%	4%	30%	52%	132	44%	6%	7%	36%	51%	4%	22%	50%	42%
OKLAHOMA CITY MSA	22%	26	41%	8%	4%	42%	46%	145	49%	2%	21%	44%	33%	4%	25%	44%	27%
ENID MSA	2%	2	3%	0%	0%	0%	100%	4	1%	0%	0%	50%	50%	0%	26%	53%	21%
NORTHEASTERN OKLAHOMA REGION	5%	6	9%	0%	0%	50%	50%	9	3%	0%	0%	22%	78%	0%	10%	65%	25%
MUSKOGEE REGION	6%	5	8%	20%	20%	40%	20%	6	2%	17%	17%	17%	50%	< 1	27%	53%	20%
KAY COUNTY REGION	1%	2	3%	0%	0%	50%	50%	1	1%	0%	0%	0%	100%	0%	0%	51%	49%
Limited-Scope:																	