| Name of institution: Citigroup | | | | Submission date: January 28, 2011 | Person to be contacted about this report: Peter Bieszard |
|---|------------|-------------|-----------|--|--|
| PART I. QUANTITATIVE OVERVIEW | | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage | <u>ост</u> | 2010 NOV | DEC | <u>Key</u> | <u>Comments</u> |
| a. Average Loan Balance (Daily Average Total Outstanding) | \$118,678 | \$117,142 | \$116,641 | Consists of residential whole loans. Excludes assets classified as trading assets that are not part of the core mortgage portfolio. | End of period first mortgage loan balances decreased \$534 million or less than 1% from the prior period. Increase in loan originations for the period was \$7.8 billion and asset sales were \$6.7 billion, with the remaining fluctuation due to loan repurchases and normal runoff not being replaced by new product activity |
| b. Total Originations | \$7,242 | \$7,273 | \$7,876 | Originations includes new loans whether for refinancing of an existing home or the purchase of a home. It does not include troubled debt restructurings which usually includes a restructuring of terms and not additional extensions of credit. | |
| (1) Refinancings | \$3,414 | \$3,716 | \$3,847 | If on a refinancing, amounts were added to the existing loan balance, the total amount of the new loan is reported. Originations include both loans originated for the balance sheet as well as loans originated for sale. | |
| (2) New Home Purchases | \$386 | \$351 | \$421 | | |
| 2. Home Equity | | | | 1 | |
| a. Average Total Loan Balance | \$53,004 | \$52,309 | \$51,689 | Includes HELOC and 2nd mortgages. | Home equity loans are primarily sourced through Retail Bank branches and are included in Citi's loss mediation and loan modification programs. Citi continues to expand participation in its loss mitigation efforts and programs focused on helpin homeowners facing financial difficulty to modify their loans. Through initiatives like the Citi Homeownership Assistance Program and the Home Affordable Mortgage Program, Citi modified approximately 9,800 first and second mortgage loans totaling more than \$1.9 billion in December. |
| b. Originations (New Lines+Line Increases) | \$86 | \$88 | \$79 | If a line is increased, only the amount of the increase is included in originations. If we originated a new HELOC or 2nd, we included the amount drawn in the Ending and Average Balances, and we included the total new line in originations. | |
| c. Total Used and Unused Commitments | \$67,476 | \$66,535 | \$65,755 | | |
| 3. US Card - Managed | | | | | |
| a. Average Total Loan Balance - Managed | \$119,738 | \$118,786 | \$121,227 | Balances do not include commercial card activity. | Purchase sales were up 16.85% versus prior month and down 5.5% versus same month of prior year. Averag receivables were up from prior month. Card members continued to participate in Citi's expanded eligibility forbearance programs; total balances in these programs decreased 9.0% vs. prior year and 2.9% vs. November 1.0% vs. prior year and 2.9% vs. prior year and 2.9% vs. prior year and 2.9% vs. prior year year year year year year year yea |
| b. New Account Originations (Initial Line Amt) | \$5,511 | \$6,660 | \$7,874 | | with more than 82,000 card member sign-ups in December. |
| c. Total Used and Unused Commitments | \$694,755 | \$692,803 | \$692,588 | | |
| 4. Other Consumer | | | | | 1 |
| a. Average Total Loan Balance | \$57,078 | \$56,412 | \$54,791 | Includes auto, student and personal loans. Student loans includes related deferred fees and lines of credit with schools (which are secured by student loans). | Average Total Loan Balance decreased due to the sale of the Student Loan Portfolio in December 2010. |
| b. Originations | \$435 | \$567 | \$485 | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I | <u>OCT</u> | <u>NOV</u> | DEC | <u>Key</u> | <u>Comments</u> |
|--|------------|------------|-----------|--|---|
| a. Average Total Loan and Lease Balance | \$16,221 | \$16,750 | \$16,322 | Renewals and new commitments are on a facility basis. Facilities may include L/Cs. Renewals represent credit facilities that expired/matured and were renewed during the period. | Overall change in C&I balances is due to increases in renewals and new commitments which was offset by normal activity. |
| . Renewal of Existing Accounts | \$1,861 | \$2,013 | \$3,440 | | |
| . New Commitments | \$1,006 | \$1,703 | \$2,829 | | |
| . Commercial Real Estate | | | | | |
| Average Total Loan and Lease Balance | \$15,690 | \$14,810 | \$13,205 | Renewals and new commitments are on a facility basis. Facilities may include L/Cs. Renewals represent credit facilities that expired/matured and were renewed during the period. | Average Total Loan and Lease Balances decreased due to the termination of 6 facilities. Renewals decrease as there were no significant renewals for Commercial Real Estate Loans in December 2010. |
| . Renewal of Existing Accounts | \$16 | \$120 | \$73 | | |
| . New Commitments | \$706 | \$722 | \$535 | | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millio | ons \$) | | | | |
| . Average Total Loan Balance | \$8,232 | \$8,030 | \$7,950 | | Average balances were down 1.0% month on month and originations were up 6.5%. |
| o. Originations | \$59 | \$66 | \$71 | | |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume | | | | | |
| a. Mortgage Backed Securities | \$573 | \$3,756 | -\$3,886 | Does not include maturities and pay downs. Net Purchased Volume is reported using cost basis. | Volume decreased due to MBS bond sales increased due to sales outpacing purchases. |
| b. Asset Backed Securities | \$147 | \$345 | \$33 | | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | \$122,641 | \$120,915 | \$116,209 | Average Total Matched Book (Repo/Reverse Repo) is before FIN 41 netting. Includes security lending activity. | |
| o. Average Total Debit Balances ² | \$16,449 | \$15,754 | \$16,928 | | |
| 3. Underwriting | | | | <u> </u> | |
| a. Total Equity Underwriting | \$52 | \$120 | \$65 | Equity Underwriting represents Citi's portion of underwritten issue. | Industry stats include: 1. 54 High Yield deals in December for a total of \$25.0 billion compared to 80 deals in November for \$35.0 billion. 2. 304 Investment Grade deals in December for a total of \$50.0 billion compared to 301 deals in November for \$68.7 billion. |
| b. Total Debt Underwriting | \$7,276 | \$7,361 | \$5,976 | Debt underwriting represents Citi's portion of underwritten issue and extensions of credit to finance specific individual Community Development projects that are in bond form. | 3. 106 Equity and Linked deals in December for a total of \$32.1 billion compared to 101 deals in November for \$51.0 billion. |

- 2. Applicable or manufact book activity boos not exceed 300 minors.

 2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.

 3. Memoranda: These loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and included loans guaranteed by the Small Business Administration and/or other loans that are internally classified as small business loans. Citi provides other financing to small businesses that is not included in this number.

Name of institution: Citigroup

Reporting month(s): December 2010 Submission date: January 28, 2011

Person to be contacted regarding this report: Peter Bieszard

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Company description: Citigroup Inc. ("Citi") does business in the United States through Citibank, Citi Institutional Clients Group, The Citi Private Bank, CitiFinancial, CitiMortgage and Citi Cards.

All data cited below reflect comparisons to November 2010, unless otherwise noted.

Consumer Lending: Citi originated \$16.3 billion in new loans to U.S. consumers and small businesses in December, up 12 percent from the prior month. U.S. unemployment decreased to 9.4 percent, from 9.8 percent in November.

Citi's first mortgage loan originations totaled \$7.9 billion, up more than 8 percent from November. Average mortgage loan balances declined by less than 1 percent to \$116.6 billion.

Average home equity loan balances were \$51.7 billion, a decline of more than 1 percent from November. Used and unused commitments totaled \$65.8 billion, also down more than 1 percent from the prior month.

As in previous months, Citi continued to expand participation in its loss mitigation efforts and programs focused on helping homeowners facing financial difficulty to modify their loans. Through initiatives like the Citi Homeownership Assistance Program, CitiFinancial's proprietary modification program and the Home Affordable Mortgage Program, Citi modified approximately 9,800 first and second mortgage loans totaling more than \$1.9 billion in December.

In December, Citi issued new credit card lines totaling \$7.9 billion, up more than 18 percent from November. Purchase sales increased by nearly 17 percent month-to-month, but declined more than 5 percent from December 2009. Average total card balances increased by more than 2 percent to \$121.2 billion.

Card members continued to participate in Citi's expanded eligibility forbearance programs in December. More than 82,000 card members enrolled in these programs during the month, compared with 84,000 in November. Total balances covered by Citi's forbearance programs declined by nearly 3 percent on a month-to-month basis and 9 percent from the prior-year period.

In December, originations in other consumer lending categories decreased more than 14 percent to \$485.2 million.

Name of institution: **Citigroup**

Reporting month(s): December 2010 Submission date: January 28, 2011

Person to be contacted regarding this report: Peter Bieszard

Commercial Lending: In December, Citi originated \$12.9 billion in corporate loans, up more than 7 percent from November.

New Commercial & Industrial (C&I) loan commitments totaled \$2.8 billion, an increase of more than 66 percent month-to-month. Loan renewals in December totaled \$3.4 billion, an increase of more than 70 percent from November. Average total C&I loan balances were \$16.3 billion, declining more than 2 percent from November balances.

New Commercial Real Estate (CRE) loan commitments were \$534.6 million, decreasing 26 percent month-to-month. Loan renewals totaled \$73 million, a decline of more than 39 percent from November. Average total CRE loan and lease balances were \$13.2 billion, declining more than 10 percent from November.

Other Intermediation Activities: Citi recorded net sales of \$3.9 billion in mortgage- and asset-backed securities (MBS/ABS) in December, compared with net purchases of \$4.1 billion in November. Higher MBS sales volume reflected increased customer demand for Agency pass-through bonds.

Citi's total debt underwriting was \$6.0 billion in December, a decrease of more than 18 percent month-to-month that reflected lower average per deal and deal volumes. High yield underwriting activity included 54 deals totaling \$25 billion, compared with 80 transactions with a cumulative total of \$35 billion in November. Citi lead managed 11 high yield deals with an aggregate value of \$1.5 billion. In December, Citi also participated in 304 investment grade transactions with an aggregate value of \$50 billion, compared with 301 deals totaling \$68.7 billion in November. Citi lead managed 53 of these transactions with a total value of \$7.1 billion. Citi also participated in 106 equity and linked deals with an aggregate value of \$32.1 billion in November, compared with 101 deals totaling \$51.0 billion in November. Citi lead managed 15 deals with a total value of \$1.6 billion.

| TREASURY MONTHLY INTERMEDIATION SNAPSHOT | | | | | | | | |
|---|------------|-------------|----------|--|--|--|--|--|
| Name of institution: Fifth Third Bancorp | | | | Submission date: January 28, 2011 | Person to be contacted about this report: Blane Scarberry | | | |
| PART I. QUANTITATIVE OVERVIEW | | | | | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) | <u>OCT</u> | 2010 NOV | DEC | <u>Key</u> | <u>Comments</u> | | | |
| 1. First Mortgage a. Average Loan Balance (Daily Average Total Outstanding) | \$10,884 | \$11,239 | \$11,545 | Average balance consists of 1-4 family residential mortgage loans consistent with the classificatio of the FR Y9C report. This includes loans held for sale and held for investment. | n Total originations for the month were up and totaled approximately \$2.8 billion driven by \$2.3 billion of refinancing activity. | | | |
| b. Total Originations | \$2,291 | \$2,490 | \$2,804 | | | | | |
| (1) Refinancings | \$1,884 | \$2,096 | \$2,340 | | | | | |
| (2) New Home Purchases | \$406 | \$394 | \$464 | | | | | |
| 2. Home Equity | | | | | | | | |
| a. Average Total Loan Balance | \$11,204 | \$11,105 | \$11,038 | Average balance consists of HELOC and HELOAN accounts consistent with the classification of the FR Y9C report. | Fifth Third extended \$105 million of home equity lines of credit during the month, an increase of \$22 million from November. | | | |
| b. Originations (New Lines+Line Increases) | \$106 | \$83 | \$105 | | | | | |
| c. Total Used and Unused Commitments | \$18,969 | \$19,014 | \$18,878 | | | | | |
| 3. US Card - Managed | | | | | | | | |
| a. Average Total Loan Balance - Managed | \$2,154 | \$2,162 | \$2,246 | Average balance consists of US cards for consumer obligors only, consistent with the classification of the FR Y9C report. Business cards are included in C&I balances. | n December new credit card extensions were \$98 million, a decrease of \$10 million from extensions in November. | | | |
| b. New Account Originations (Initial Line Amt) | \$119 | \$108 | \$98 | | | | | |
| c. Total Used and Unused Commitments | \$12,159 | \$12,326 | \$12,280 | | | | | |
| 4. Other Consumer | | | | | | | | |
| a. Average Total Loan Balance | \$11,012 | \$11,065 | \$11,147 | Average balance consists of auto and other consumer loans and leases consistent with the classification of the FR Y9C report. | Other consumer loan originations, which include new car loans, were \$532 million in December. This was an increase of approximately \$49 million over November. | | | |
| b. Originations | \$445 | \$483 | \$532 | | | | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I | <u>OCT</u> | <u>NOV</u> | DEC | <u>Key</u> | <u>Comments</u> |
|--|------------|-----------------------|--------------------|--|--|
| a. Average Total Loan and Lease Balance | \$28,419 | \$27,704 | \$28,288 | Average balance consists of non-real estate commercial loans and leases consistent with the classification of the FR Y9C report. This includes business cards. | New C&I commitments originated in December 2010 increased to \$3.37 billion compared to \$2.03 billion in November 2010. |
| b. Renewal of Existing Accounts | \$1,603 | \$1,781 | \$3,562 | Includes renewed funded loans and renewed commitments. | |
| c. New Commitments | \$1,464 | \$2,033 | \$3,368 | Includes new commitments both funded and unfunded | |
| 2. Commercial Real Estate | | | | | |
| a. Average Total Loan and Lease Balance | \$15,499 | \$15,329 | \$15.00/ | Average halance consists of real estate secured commercial loans consistent with the classification | New CRE commitments originated in December 2010 were \$218 million, compared to \$123 million in |
| | | | | of the FR Y9C report. | November 2010 at \$367 million. |
| b. Renewal of Existing Accounts | \$254 | \$367 | \$1,180 | Includes renewed funded loans and renewed commitments. | |
| c. New Commitments | \$138 | \$123 | \$218 | Includes new commitments both funded and unfunded | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$ 4. Small Business Loans ³ | 5) | | | | |
| a. Average Total Loan Balance | \$4,807 | \$4,747 | \$4,735 | Small business loans are those classified as small business under standards established by Fifth Third Bank. These loans are already presented within the C&I and CRE categories. Thus, this disclosure is a subset of schedule B items 1 and 2. | Small Business commitments originated in December 2010 were \$438 million, which was up from \$329 million in November 2010. |
| b. Originations | \$319 | \$329 | \$438 | | |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume | | | | | |
| a. Mortgage Backed Securities | \$299 | \$383 | \$289 | Consists of MBS purchases less sales for the month. | Agency CMO net purchases totaled \$123 million and Agency MBS net purchases totaled \$166 million. |
| b. Asset Backed Securities | \$25 | \$0 | \$0 | Consists of ABS purchases less sales for the month. | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | NA | NA | NA | | |
| b. Average Total Debit Balances ² | NA | NA | NA | | |
| 3. Underwriting | | | | | |
| a. Total Equity Underwriting | NA | NA | NA | | |
| b. Total Debt Underwriting | \$758 | \$321 | \$1,469 | | |
| Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lending serv. 3. Memoranda: these loans are already accounted for in either consumer lending, comn | | ombination of both, a | nd include loans g | guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans. | |

Name of institution: **Fifth Third Bancorp** Reporting month(s): December 2010 Submission date: January 28, 2011

Person to be contacted regarding this report: Blane Scarberry

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Commercial sections:

<u>CRE</u>: Average CRE balances decreased by approximately 1.5% in December 2010 compared to November 2010. New CRE commitments originated in December 2010 were \$218 million, compared to \$123 million in November 2010. Renewal levels for existing accounts increased in December 2010 to \$1.18 billion versus November 2010 at \$367 million. Payments and dispositions outpaced the volume of renewals and new originations in December causing the overall average balances to continue to decline. As commercial vacancy rates continue to increase, Fifth Third continues to monitor the CRE portfolios and continues to suspend lending on most new non-owner occupied properties and on new homebuilder and developer projects in order to manage existing portfolio positions. We feel this is prudent given that we do not believe added exposure in those sectors is warranted given our expectation for continued elevated loss trends in the performance of those portfolios.

<u>C&I</u>: Average C&I balances increased by approximately 2.1% in December 2010 compared to November 2010. New C&I commitments originated in December 2010 increased to \$3.37 billion compared to \$2.03 billion in November 2010. Renewal levels for existing accounts in December 2010 of \$3.56 billion were up from November 2010 at \$1.78 billion. Lending in the Commercial segment continues to qualified borrowers exhibiting average risk or better. Continued emphasis is placed on prudent underwriting and demonstrated ability to repay as well as industry segment. Loan inquiries have begun to increase, however, we are still continuing to see caution from our C&I borrowers as they attempt to gauge the actual strength of the recovery which to this point has been influenced by geography. In general, customers continue to remain deleveraged and liquid through reduced inventories versus expanding operations and capacity.

The primary market for syndicated credit and large corporate deals has seen a modest increase in 2010. Given a cautionary outlook for the economy and uncertainty in global markets, many companies continue to defer plans for significant capital expenditures and inventory build, which in turn has reduced the need for large, new financing. Financing for merger and acquisition activity has continued to remain relatively slow, though a modest increase has been observed recently. Terms and covenants continue to be somewhat tighter than historical averages, which has also served to constrain demand. Credit spreads have been somewhat tighter in the last several months which has helped the flow of new credit in both investment grade and high quality non-investment grade loans.

Name of institution: **Fifth Third Bancorp** Reporting month(s): December 2010 Submission date: January 28, 2011

Person to be contacted regarding this report: Blane Scarberry

<u>Small Business</u>: Average Small Business balances decreased by approximately 0.3% in December 2010 compared to November 2010. Small Business commitments originated in December 2010 were \$438 million, which was up from \$329 million in November 2010. Demand for Small Business credit has been in a relatively stable range with a slight bias to run off over new production. Business Banking loan originations continue to be made using prudent underwriting standards.

Overall, average total commercial loan and lease balances were up 0.8% in December 2010 compared to November 2010. We continue to actively work out problem loans and receive principal payments from borrowers. The growth seen in C&I loans more than offset continued reduction in our commercial real estate portfolios driving the overall impact on the average balances in the month of December 2010.

Consumer Section:

Consumer: December new credit card extensions were \$98 million, a decrease of \$10 million from extensions in November. Other consumer loan originations, which include new car loans, were \$532 million in December. This was an increase of approximately \$49 million over November.

December 2010 overall loan volume for non-mortgage consumer credit (home equity, credit card and auto) was up compared to November 2010 given an increase in originations.

December 2010 mortgage lending continued to be driven by attractive interest rates. Total originations for the month were up and totaled approximately \$2.8 billion driven by \$2.3 billion of refinancing activity. New home purchases increased \$70 million from the previous month totaling \$464 million for December. We also extended \$105 million of home equity lines of credit during the month, an increase of \$22 million from November.

During the month of December, Fifth Third continued to monitor the need for prudent adjustments to consumer lending standards consistent with peer institutions as reported by the Federal Reserve and as observed in the market.

In December of 2010, Fifth Third's portfolio of consumer loans and leases increased 1.1% relative to November 2010.

Treasury Section:

December investment portfolio activity included the re-investment of portfolio cash flows into MBS and CMO's. For the month, Agency CMO net purchases totaled \$123 million and Agency MBS net purchases totaled \$166 million.

| TREASURY MONTHLY INTERMEDIATION SNAPSHOT | | | | | | | |
|--|------------|-------------|----------|---|---|--|--|
| Name of institution: KeyCorp | | | | Submission date: 1/28/10 | Person to be contacted about this report: Robert L. Morris | | |
| PART I. QUANTITATIVE OVERVIEW | | | | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) | <u>ост</u> | 2010 NOV | DEC | <u>Key</u> | <u>Comments</u> | | |
| I. First Mortgage Average Loan Balance (Daily Average Total Outstanding) | \$3,002 | \$2,993 | | First Mortgage includes loans secured by 1-4 family residential properties including home equity loans secured by first liens. | The increase in December originations reflects the year-to-date high fundings from peak application volume in October, as well as growth in first lien Home Equity closings. | | |
| b. Total Originations | \$202 | \$225 | \$280 | Total Originations include both portfolio and held-for-sale loan originations. | | | |
| (1) Refinancings | \$155 | \$173 | \$237 | | | | |
| (2) New Home Purchases | \$47 | \$52 | \$43 | | | | |
| 2. Home Equity | | | | | | | |
| a. Average Total Loan Balance | \$8,211 | \$8,173 | \$8,120 | Home Equity includes home equity lines of credit only (Home equity loans secured by first liens a included with First Mortgages above). | re Overall Home Equity loan applications declined 10% from November but were 19% higher than the year-ago period. | | |
| b. Originations (New Lines+Line Increases) | \$68 | \$65 | \$63 | | | | |
| c. Total Used and Unused Commitments | \$15,905 | \$15,836 | \$15,750 | | | | |
| 3. US Card - Managed | | | | | | | |
| a. Average Total Loan Balance - Managed | N/A | N/A | N/A | | | | |
| b. New Account Originations (Initial Line Amt) | N/A | N/A | N/A | | | | |
| c. Total Used and Unused Commitments | N/A | N/A | N/A | | | | |
| 4. Other Consumer | | | | | | | |
| a. Average Total Loan Balance | \$9,563 | \$9,461 | \$9,358 | Other Consumer includes all other non-revolving consumer loans. | Loan application volume continues to trend downward, with December volume 20% lower than the November level, reflective of the seasonal application reduction. However, loan application volumes continue to be higher than the year-ago levels, with December loan application volume 39% higher than the December 2009 level. | | |
| b. Originations | \$13 | \$11 | \$10 | | - | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I | <u>OCT</u> | <u>NOV</u> | DEC | <u>Key</u> | |
|--|------------|-----------------------|--------------------|--|--|
| a. Average Total Loan and Lease Balance | \$23,264 | \$23,099 | \$22,918 | C & I includes lease financing receivables, commercial and industrial loans, agricultural loans, loans to depository institutions and other nonconsumer loans. | C & I new loan approval volume in December reached a peak for the year, led by traditionally strong year-end Leasing volume and steady production in the Middle Market, Institutional Banking and Business Banking segments. |
| b. Renewal of Existing Accounts | \$1,081 | \$660 | | Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw. | |
| c. New Commitments | \$1,086 | \$1,096 | \$1,371 | New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit. | |
| 2. Commercial Real Estate | | | | | |
| a. Average Total Loan and Lease Balance | \$12,567 | \$12,228 | \$12 114 | Commercial Real Estate includes construction and land loans, loans secured by multi-family | Origination activity was broad-based in December, with new transactions occurring across KeyCorp's lines of |
| arrenge rotal zon and zeuse samme | | Ψ12,220 | | residential properties and by other nonresidential properties. | business. Real Estate Capital accounted for 48% of the new volume coming from all segments (healthcare, institutional and income property). Middle Market accounted for 31% of the new volume and the Institutional |
| b. Renewal of Existing Accounts | \$103 | \$179 | | Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw. | Bank accounted for 9%. Renewal volume in December was primarily within the Real Estate Capital segment. |
| c. New Commitments | \$58 | \$191 | \$362 | New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit. | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Million: 4. Small Business Loans ³ | s \$) | | | | |
| a. Average Total Loan Balance | \$2,956 | \$2,932 | \$2,921 | Small Business includes loans guaranteed by the Small Business Administration ("SBA") and other loans internally classified as small business loans. | December's new loan approval volume remained strong at \$99 million. This compares favorably to the December 2009 level of \$45 million and the December 2008 level of \$39 million. However, loan demand from clients with less than \$1 million in revenue remains weak. Loan renewal volume was stable at \$148 million |
| b. Originations | \$66 | \$82 | \$106 | | |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume | | | | | |
| a. Mortgage Backed Securities | -\$46 | \$1,092 | | December mortgage backed securities ("MBS") net purchased volume includes \$651 million in purchases and \$648 million in paydowns, calls and maturities. | The December purchases of collateralized mortgage obligations issued by government-sponsored entities was approximately equal to the amount received in maturities, calls, and paydowns and reflects KeyCorp's efforts to support overall balance sheet liquidity management strategies. |
| b. Asset Backed Securities | \$0 | \$0 | \$0 | | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | N/A | N/A | N/A | | |
| b. Average Total Debit Balances ² | N/A | N/A | N/A | | |
| 3. Underwriting | | | | | |
| a. Total Equity Underwriting | \$28 | \$218 | \$121 | Represents KeyCorp's equity underwriting commitments. | KeyCorp was the co-manager on seven equity deals, totaling \$121 million in underwriting commitments, compared to six deals totaling \$226 million in December 2009. Taxable debt underwriting consisted of five deals totaling \$111 million in underwriting commitments, of which three deals were investment grade and two were |
| b. Total Debt Underwriting | \$349 | \$853 | \$122 | Represents KeyCorp's taxable and municipal debt underwriting commitments. | not rated. Municipal debt underwriting totaled \$11 million in underwriting commitments. |
| Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lending se 3. Memoranda: these loans are already accounted for in either consumer lending, cor | | mbination of both, ar | nd include loans g | uaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans. | |

Name of institution: KeyCorp

Reporting month(s): December 2010

Submission date: 1/28/10

Person to be contacted regarding this report: Robert L. Morris

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Cleveland-based KeyCorp is one of the nation's largest bank-based financial services companies, with consolidated total assets of approximately \$91.8 billion at December 31, 2010. Through KeyBank and certain other subsidiaries, KeyCorp provides a wide range of retail and commercial banking, commercial leasing, investment management, consumer finance, and investment banking products and services to individual, corporate and institutional clients through two major business groups, Key Community Bank and Key Corporate Bank. Key Community Bank serves consumers and small to mid-sized businesses through the company's 14-state branch network, which is organized into three internally defined geographic regions: Rocky Mountains and Northwest, Great Lakes, and Northeast. Key Corporate Bank includes those corporate and consumer business units that operate nationally, within and beyond KeyCorp's 14-state branch network, as well as internationally.

General

KeyCorp's overall credit originations increased in December from November's level. Credit demand for Commercial and Industrial ("C & I") lending was strongest in the Leasing segment due to the typical year-end volume peak. Commercial Real Estate ("CRE") originations reached a new year-to-date high for the second consecutive month. Consumer credit demand continues to slowly improve along with improving application credit quality.

Consumer

Consumer credit demand appears to be slowly rebounding from the low levels experienced in late 2009 and early 2010. Credit quality metrics remain strong with year-over-year average bureau scores and approval rates increasing.

With the continued improvement in credit quality, KeyCorp has started to ease some credit standards for consumer lending.

C & I

C & I new loan approval volume increased in December, led by the anticipated December year-end peak in Leasing volume, which reached nearly \$700 million for the month. The Middle Market and the Institutional Bank segments also experienced strong new loan approval volumes.

Commercial Real Estate

Overall commercial real estate originations reached a year-to-date high of \$362 million in December. Originations in the Real Estate Capital segment were driven by real estate investment trusts and healthcare operators. KeyCorp also experienced year-to-date high origination volumes in owner - occupied property financing, which occurred in several areas of the Middle Market and Institutional Bank segments.

Name of institution: KeyCorp

Reporting month(s): December 2010

Submission date: 1/28/10

Person to be contacted regarding this report: Robert L. Morris

Small Business

Small Business loan approval volume of \$99 million in December reflects an increase of \$5 million from November's level of \$94 million and is more than double the levels experienced in both December 2009 and 2008. Traditional business lending and SBA lending have experienced a steady recovery throughout 2010; however, the levels remain slightly below pre-recessionary levels. Loan demand from clients with less than \$1 million in revenue remains weak.

Investment Portfolio

KeyCorp continues to use the available-for-sale securities portfolio to support strategies for managing overall balance sheet liquidity and interest rate risk. In December, the size of KeyCorp's investment portfolio remained essentially the same, as purchases of \$651 million of collateralized mortgage obligations issued by government-sponsored entities were offset by \$648 million in maturities, calls, and paydowns.

| TREASURY MONTHLY INTERMEDIATION SNAPSHOT | | | | | | | | | | |
|---|------------|-------------|---------|--|--|--|--|--|--|--|
| Name of institution: Marshall & Ilsley Corporation | | | | Submission date: 01/31/11 | Person to be contacted about this report: Gregory A. Smith | | | | | |
| PART I. QUANTITATIVE OVERVIEW | | | | | | | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage | <u>ост</u> | 2010 NOV | DEC | <u>Kev</u> | Comments | | | | | |
| a. Average Loan Balance (Daily Average Total Outstanding) | \$6,347 | \$6,252 | \$6,145 | Includes all closed end residential RE; First Mortgages and Home Equity Loans (Approximately 80% of Home Equity Loans are held in first position). This excludes construction and vacant land loans which are included in the Commercial Real Estate section as average loan balances. | The decrease in mortgage originations from November to December was primarily driven by the slow down refinance activity as the interest rates on fixed rate mortgages increased. | | | | | |
| b. Total Originations | \$305 | \$279 | \$241 | 1-4 Family Residential Mortgage Originations - includes loans held by M&I Portfolio and loans originated to be sold into the secondary market. This excludes construction and vacant land loans which are included in the Commercial Real Estate section as new commitments. | | | | | | |
| (1) Refinancings | \$250 | \$227 | \$190 | | | | | | | |
| (2) New Home Purchases | \$55 | \$52 | \$51 | | | | | | | |
| 2. Home Equity | | | | | | | | | | |
| a. Average Total Loan Balance | \$2,565 | \$2,533 | \$2,507 | Includes Home Equity Lines only. | Average Total Loan Balance was down month-over-month as runoff continues to outpace new production Originations were effectively flat month-over-month while Total Used and Unused Commitments were do slightly. | | | | | |
| b. Originations (New Lines+Line Increases) | \$26 | \$28 | \$28 | | | | | | | |
| c. Total Used and Unused Commitments | \$4,625 | \$4,589 | \$4,552 | | | | | | | |
| 3. US Card - Managed | | | | | 1 | | | | | |
| a. Average Total Loan Balance - Managed | \$275 | \$276 | \$285 | Includes Consumer Card only. | Average Total Loan Balance was up month-over-month reflecting holiday season spending. New Account Originations were down month-over-month, but comparable to Dec '09 levels, reflecting the ending of the New Originations campaign that had been in place in the preceding months. Total Used and Unused | | | | | |
| b. New Account Originations (Initial Line Amt) | \$10 | \$10 | \$6 | | Commitments were effectively flat month-over-month but higher than Dec '09. | | | | | |
| c. Total Used and Unused Commitments | \$1,326 | \$1,331 | \$1,329 | | | | | | | |
| 4. Other Consumer | | | | 1 | 1 | | | | | |
| a. Average Total Loan Balance | \$1,885 | \$1,882 | \$1,107 | Includes consumer PRA & LOCs. Subcategories include Auto Leases, Dealer Finance, Personal, Securities Loans, and Student Loans. | Average Total Loan Balances decreased in December due to a \$934M loan sale which occurred mid-month. This loan sale was on performing auto loans originated by our Dealer Finance group. Originations decreased month-over-month, led by Dealer Finance, attributed to seasonality and increased competition. | | | | | |
| b. Originations | \$59 | \$59 | \$52 | Includes Additional Notes and Refinances to existing customers and notes to new customers. | | | | | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I | <u>OCT</u> | <u>NOV</u> | DEC | <u>Key</u> | <u>Comments</u> |
|--|------------|------------|----------|--|---|
| a. Average Total Loan and Lease Balance | \$11,906 | \$11,781 | \$11,605 | Includes A/R and Inventory, Dealer Commercial, Agricultural, IRB's and Muni, and Commercial Leases. | Average Balances continue to decline, consistent with prior month trends. In the 4th quarter, this contraction was led by Real Estate Rental/Leasing and Construction. Renewals increased from November to December, reflecting variation in renewal cycles. Several new deals resulted in increased New Commitment levels. |
| b. Renewal of Existing Accounts | \$131 | \$200 | \$281 | Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established. | Companies continue to defer capital expenditures, pay down debt, use internally generated cash and delay investments in infrastructure, all of which influences customer borrowing needs. |
| c. New Commitments | \$67 | \$121 | \$158 | Includes New Loans to New Customers and Unused Commitments to C&I (Also includes Unused Commitments to: Finance Agricultural Production and Other). | |
| 2. Commercial Real Estate | | | | | |
| a. Average Total Loan and Lease Balance | \$16,589 | \$16,343 | \$15,959 | Includes Business Purpose 1-4 and Construction, Development, & Vacant Land (Commercial and Residential). | Continuing with past monthly trends, Commercial Real Estate Average Balances decreased month-over-month led by Construction and Development loans. Renewals were higher than prior months, driven primarily by seven large relationships renewed in December. Commercial Real Estate Average Balances are expected to |
| b. Renewal of Existing Accounts | \$32 | \$78 | \$92 | Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established. | continue contracting due to portfolio amortization. |
| c. New Commitments | \$14 | \$16 | \$16 | Includes New Loans to New Customers and Unused Commitments for CRE (Also includes Unused Commitments to: New Construction, Land Development and Other Land; Farmland; 1-4 Family Residential Properties; Multi-Family (5 or more) Residential Properties). | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Mill | lions \$) | | | | |
| 4. Small Business Loans ³ | | | | | T |
| a. Average Total Loan Balance | \$3,124 | \$3,088 | \$3,050 | Includes SBA-guaranteed loans and Business Loans & Commitments < \$1 million to customers with Revenue < \$1 million. Excludes Letters of Credit. | Average Total Loan Balance decreased month-over-month led by Commercial Real Estate Loans. December Originations were higher than November led by Agricultural Loans Secured by Farmland. Pipelines and Originations remain at historically low levels due to a decrease in demand as customers continue to address |
| b. Originations | \$14 | \$14 | \$17 | | impacts from current economic conditions. |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$ 1. MBS/ABS Net Purchased Volume | 5) | | | | |
| a. Mortgage Backed Securities | -\$43 | \$236 | \$1,340 | Includes Mortgage Backed security purchase activities net of any security MBS sale activities, within the consolidated investment holdings. At Qtr-end this may also include Traded-not-settled transactions. | \$1.3 billion net purchase activity resulted from: 1) the reinvestment of proceeds from an auto loan portfolio into GNMA securities; and 2) reinvestment of runoff from the Bank and an investment sub's investment portfolio. |
| b. Asset Backed Securities | \$0 | \$0 | \$0 | | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | N/A | N/A | N/A | | |
| b. Average Total Debit Balances ² | N/A | N/A | N/A | | |
| 3. Underwriting | | | | | 1 |
| a. Total Equity Underwriting | N/A | N/A | N/A | | |
| b. Total Debt Underwriting | N/A | N/A | N/A | | |
| Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lendi | | | | | 1 |

- 2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.
 3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): December 2010

Submission date: 01/31/2011

Person to be contacted regarding this report: Gregory A. Smith

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

Marshall & Ilsley Corporation (NYSE: MI) (M&I) is a diversified financial services corporation headquartered in Milwaukee, Wis. M&I Marshall & Ilsley Bank is the largest Wisconsin-based bank, with 190 offices throughout the state. In addition, M&I has 53 locations throughout Arizona; 36 offices along Florida's west coast and in central Florida; 33 offices in Indianapolis and nearby communities; 26 offices in metropolitan Minneapolis/St. Paul, and one in Duluth, Minn.; 17 offices in the greater St. Louis area; 15 offices in Kansas City and nearby communities; and one office in Las Vegas, Nev. M&I also provides trust and investment management, equipment leasing, mortgage banking, asset-based lending, financial planning, investments, and insurance services from offices throughout the country and on the Internet (www.mibank.com or www.micorp.com).

On December 17, 2010, M&I entered into a definitive agreement under which BMO Financial Group will acquire all outstanding shares of common stock of M&I in a stock-for-stock transaction. Under the terms of the agreement, each outstanding share of M&I will be exchanged for 0.1257 shares of Bank of Montreal upon closing. The transaction is expected to close prior to July 31, 2011. The transaction is subject to customary closing conditions, including regulatory approvals and approval from shareholders of M&I.

The communities and customers M&I serves continue to face impacts from the current recessionary conditions of the economy. Nonetheless, M&I extended approximately \$550 million of new credit to new and existing customers in December for a total of over \$10.8 billion since the infusion of CPP capital in mid-November 2008 (The "new credit" amount includes new and expanded extensions of credit, or commitments to extend credit, as well as renewals of existing credit where a new promissory note was executed). Included in the figures above are small business new credit extensions of \$21 million in December and over \$739 million since receipt of CPP capital. ("Small business" includes: (1) SBA-guaranteed loans and (2) Commercial purpose loans where the original note amount was \$1 million or less, outstanding commitments were \$1 million or less and the customer had (recorded) revenue of \$1 million or less). Additionally, M&I has continued with a franchise-wide foreclosure abatement program designed to keep families in their homes, including a foreclosure moratorium on certain owner-occupied residential loans through March 31, 2011.

In Commercial and Industrial loans, we continue to see low line utilization from existing customers, consistent with the slower economy. Customers continue to resize their revolving credit facilities to match their working capital needs.

In Commercial Real Estate, Construction and Development concentrations continue to decline in-line with our corporate goal of reducing credit exposure in this sector. Economic uncertainty has resulted in

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): December 2010

Submission date: 01/31/2011

Person to be contacted regarding this report: Gregory A. Smith

increased challenges for customers across a variety of sectors including retail, office and hospitality. Commercial Real Estate average balances are expected to continue contracting due to portfolio amortization.

In Residential Real Estate, we are primarily utilizing secondary market options to effectively address the demand for fixed rate mortgage originations and selectively using the balance sheet for adjustable rate mortgages. The decrease in mortgage originations from November to December was primarily driven by the slow down in refinance activity as the interest rates on fixed rate mortgages increased. The Average Loan Balance decline year-over-year is attributed to originations being sold in the secondary market, periodic sales of non-performing loans and amortization of the portfolio.

In the Other Consumer category, Average Total Loan Balances decreased month-over-month due to a \$934 million loan sale on December 10, 2010. This loan sale was on performing auto loans originated by our Dealer Finance group.

| TREASURY MONTHLY INTERMEDIATION SNAPSHOT | | | | | | | | |
|---|------------|---------------------------|------------|--|---|--|--|--|
| Name of institution: Regions Financial Corporation | | | | Submission date: January 31, 2011 | Person to be contacted about this report: David Turner, Chief Financial Officer | | | |
| PART I. QUANTITATIVE OVERVIEW | | | | | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage | <u>Oct</u> | <u>2010</u> <u>Nov</u> | <u>Dec</u> | <u>Key</u> | <u>Comments</u> | | | |
| a. Average Loan Balance (Daily Average Total Outstanding) | \$16,857 | \$16,861 | \$16,526 | First and second residential 1-4 family mortgages, including residential mortgages held for sale. | | | | |
| b. Total Originations | \$881 | \$866 | \$879 | Loan originations designated for the secondary market and those to be held in portfolio on Regions' balance sheet. | | | | |
| (1) Refinancings | \$659 | \$641 | \$655 | Total originations designated as refinance status. | | | | |
| (2) New Home Purchases | \$222 | \$226 | \$224 | Total originations designated as new purchase status. | | | | |
| 2. Home Equity | | | | | | | | |
| a. Average Total Loan Balance | \$14,489 | \$14,388 | \$14,289 | Average balances include Home Equity loans and HELOCs. | Home Equity average balances declined \$99MM or 0.7% in December to \$14.3B. The HELOAN portfolio declined \$20MM, 1.3%, while HELOC balances declined \$79MM or 0.6%. Home Equity production increased 9.7% in December to \$114MM from prior month and increased 22% versus same period prior year. | | | |
| b. Originations (New Lines+Line Increases) | \$103 | \$104 | \$114 | New Home Equity loans, lines and increases. | | | | |
| c. Total Used and Unused Commitments | \$23,702 | \$23,563 | \$23,411 | Total portfolio of Home Equity loans and funded and unfunded HELOCs. Funded portion included in average balance above. | | | | |
| 3. US Card - Managed | | | | | | | | |
| a. Average Total Loan Balance - Managed | N/A | N/A | N/A | N/A - Regions Financial Corp is an Agent Bank. | N/A | | | |
| b. New Account Originations (Initial Line Amt) | N/A | N/A | N/A | | | | | |
| c. Total Used and Unused Commitments | N/A | N/A | N/A | | | | | |
| 4. Other Consumer | | | | | 1 | | | |
| a. Average Total Loan Balance | \$2,836 | \$2,816 | \$2,836 | Includes consumer direct, indirect, other revolving (i.e., overdraft lines) and student loans held for sale. | December Other Consumer Lending balances increased when compared to November by \$20 million (or 0.7%) primarily driven by the re-entry of Indirect Lending that generated \$75MM in new production during the month (versus \$63MM in the prior month) offset by the continued run-off of the legacy Indirect Lending portfolio as well as continued student loan sales. | | | |
| b. Originations | \$51 | \$103 | \$119 | Includes direct and student lending origination activity. | | | | |
| | | | | | | | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) | | | | | |
|---|-------------|---------------------|---------------------|--|--|
| 1. C & I | Oct | Nov | <u>Dec</u> | <u>Key</u> | <u>Comments</u> |
| a. Average Total Loan and Lease Balance | \$33,995 | \$34,328 | \$34,885 | Average outstanding funded balances (net of deferred fees and costs) for commercial related loans and leases. Also includes owner-occupied commercial real estate mortgage and construction loans made to operating businesses. | Loan demand remained soft in the middle market as the stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$557 million in December as compared to November levels. Commercial line utilization rates decreased slightly in December as compared to November. |
| b. Renewal of Existing Accounts | \$2,032 | \$2,099 | \$2,566 | Renewal of existing funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of renewal. Also includes letters of credit. | |
| c. New Commitments | \$1,409 | \$1,282 | \$1,977 | New funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of the commitment. Also includes letters of credit and leases. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity. | |
| 2. Commercial Real Estate | | | | | |
| a. Average Total Loan and Lease Balance | \$17,640 | \$17,267 | \$16,773 | Average outstanding funded balances (net of deferred fees and costs) for commercial investor- owned real estate related loans. Also includes Commercial loans held for sale. | In December, commercial real estate balances decreased \$494 million from November levels. In December, new loan demand remained low. Developers are reluctant to begin new projects or purchase existing projects under current economic conditions. The focus in commercial real estate lending is on renewing and restructuring real estate loans with existing |
| b. Renewal of Existing Accounts | \$933 | \$863 | \$944 | Renewal of existing funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of renewal. Also includes letters of credit. | clients. Renewal activity includes loan restructuring, remargining and repricing, consistent with the current credit quality of the sponsor, the performance of the project and the current market. |
| c. New Commitments | \$71 | \$105 | \$74 | New funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of the commitment. Also includes letters of credit. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity. | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Mi 4. Small Business Loans ³ | illions \$) | | | | |
| a. Average Total Loan Balance | \$13,044 | \$13,019 | \$13,113 | Average outstanding funded balances (net of deferred fees and costs) for commercial and commercial real estate related loans made to small business clients, which we generally define as clients with revenues up to \$20 million. These balances are reflected as components of C&I, Commercial Real Estate and First Mortgage reported above. | We expect small business demand to pick up modestly with improvement in capital investment as consumer spending has shown recent signs of improvement. We still believe business owners will remain cautious about adding jobs and expansion even as sales and profits pick up. |
| b. Originations | \$581 | \$600 | \$708 | New and renewed production of funded and unfunded commitments made to small business clients, which we generally define as clients with revenues up to \$20 million. These originations are reflected as components of C&I and Commercial Real Estate reported above. | |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions 1. MBS/ABS Net Purchased Volume | \$) | | | | |
| a. Mortgage Backed Securities | \$1,487 | \$539 | \$1,360 | | Net purchase volume as captured in bond accounting system. Reflects settlement date. Consists of Government and Agency Fixed-Rate Mortgage-Backed Products. |
| b. Asset Backed Securities | \$0 | \$0 | \$0 | | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | N/A | N/A | N/A | | |
| b. Average Total Debit Balances ² | \$1,041 | \$1,107 | \$1,254 | Reflects average margin receivables as recorded on the general ledger. | |
| 3. Underwriting | | | | <u> </u> | <u> </u> |
| a. Total Equity Underwriting | \$39 | \$45 | \$74 | Total equity underwriting activity. Represents Regions' participation percentage. | The Morgan Keegan Equity department participated in 6 offerings during October, 8 during November and 10 during December. Gross debt issuance for October, November, and December was \$15.5 billion, \$12.5 billion, and \$12.7 billion respectively. |
| b. Total Debt Underwriting | \$1,212 | \$1,443 | \$1,757 | Debt issuances delivered monthly. Represents Regions' participation percentage. | |
| Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin len 3. Memoranda: these loans are already accounted for in either consumer lend | | combination of both | ı, and include loar | I ns guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business lo: | ans. |

^{3.} Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.

Name of institution: Regions Financial Corporation

Reporting month(s): December 2010 Submission date: **January 31, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

I. Company Description

Regions Financial Corporation ("Regions" or the "Company") is a financial holding company headquartered in Birmingham, Alabama, which operates throughout the South, Midwest and Texas. Regions provides traditional commercial, retail and mortgage banking services, as well as other financial services in the fields of investment banking, asset management, trust, securities brokerage, insurance and other specialty financing. At December 31, 2010, Regions had total consolidated assets of approximately \$132 billion.

Regions conducts its banking operations through Regions Bank, its brokerage and investment banking business through Morgan Keegan & Company, Inc. ("Morgan Keegan"), and its insurance brokerage business through Regions Insurance Group, Inc.

II. Overall Summary

In December, new and renewed commitments increased by \$1.3 billion to \$6.7 billion for the month, while average balances declined \$0.4 billion from November to \$85.3 billion.

The month over month increase in new and renewed commitments was driven by a \$0.7 billion increase in C&I new commitments and a \$0.5 billion increase in C&I renewals.

III. Consumer Lending

A. Mortgage Lending

The mortgage division originated mortgage loans totaling \$879 million in December 2010. Overall production increased 1.5% from the prior month. New purchase originations decreased 0.6% from prior month, and refinancing activity increased from the prior month 2.2%. Application activity in December decreased 45% as compared to prior month.

Regions' mortgage division rolled out the U.S. Treasury sponsored Home Affordable Refinance Program (HARP) in late March 2009, which provides borrowers who have an existing loan owned or securitized by Fannie Mae or Freddie Mac, the ability to refinance to more beneficial financing terms with no new or additional mortgage insurance required, even if their current loan-to-value ratio is higher than it was on the original loan. The loan-to-value ratio cannot exceed 125%. December originations included approximately \$108.4 million related to 686 loans refinanced under the Home Affordable Refinance Program.

Name of institution: Regions Financial Corporation

Reporting month(s): December 2010 Submission date: **January 31, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

Regions' has implemented the U. S. Treasury sponsored Home Affordable Modification Program (HMP) for FNMA/FHLMC loans serviced by Regions. This program is designed to assist mortgage borrowers who have an existing loan owned or securitized by Fannie Mae or Freddie Mac, and who are in imminent danger of default or are already in default to obtain modified financing terms prescribed by the program. On March 26, 2010, the U.S. Treasury announced program modifications to the existing HMP program. These program modifications are designed to expand flexibility for mortgage servicers and originators to assist more unemployed homeowners and to help more people who owe more on their mortgage than their home is worth because their local markets saw large declines in home values. In accordance with the program guidelines, Regions has distributed approximately 2,095 modification packages to eligible borrowers subject to a ninety-day trial period. The first modifications under this program were seen in July 2009. In the month of December, Regions completed 90 modifications totaling \$12.3 million in unpaid principal. Regions currently services approximately \$21.9 billion of Fannie Mae and Freddie Mac mortgages.

B. Home Equity Lending

Home Equity production increased 9.7% in December to \$114MM from prior month and increased 22% versus same period prior year. Equity Lending activities for December include: launched HELOC product within the Consumer Finance product suite that targets the lending needs of customers that do not qualify for the traditional HELOC product but are not considered subprime borrowers. Continued daily pre-approved point of sale Equity offers at DDA account opening; pre-approved direct mail offer with lead lists to the branches; activation mailing; and HELOAN skip-a-pay program.

Overall Home Equity average balances declined \$99MM or 0.7% in December to \$14.3B. The HELOAN portfolio declined \$20MM, 1.3%, while HELOC balances declined \$79MM or 0.6%. Portfolio run-off continues as payoffs/paydowns outpace production.

C. Other Consumer Lending

Direct Lending and Other Revolving production increased 11% in December to \$39MM from prior month and increased 15% versus same period prior year. Direct/Other Lending activities for December include: continued pre-approved point of sale Auto/Unsecured LOC offers at DDA account opening; pre-approved direct mail offer with lead lists to the branches; Direct installment skip-a-pay program; and continued momentum from targeting the lending needs of customers that do not qualify for traditional credit products but are not considered subprime borrowers.

Overall, December Other Consumer Lending balances increased when compared to November by \$20 million (or 0.7%) primarily driven by the re-entry of Indirect Lending that generated \$75MM in new production during the month (versus \$63MM in the prior month) offset by the continued run-off of the legacy Indirect Lending portfolio as well as continued student loan sales.

Name of institution: Regions Financial Corporation

Reporting month(s): December 2010 Submission date: **January 31, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

D. Customer Assistance Program

Regions' continues to work to meet the unique needs of financially troubled borrowers to stem foreclosures and keep customers in their homes. Well before the full effects of the credit crisis were realized, Regions launched an extensive Customer Assistance Program (CAP) for troubled borrowers. As unemployment levels continue to be elevated and the housing crisis lingers our goal remains the same to ensure customers who encounter financial difficulty know they have options and that Regions wants to work with them.

As a result, Regions has taken steps including renegotiating the terms of mortgages and home equity loans, keeping families in their homes and allowing Regions to maintain a foreclosure rate well below industry average for residential first mortgages. Overall, the number of Regions first mortgage loans in the foreclosure process is less than half the national average. (2.10% for Regions vs. 4.39% nationally in the third quarter of 2010.) Since inception of the program, Regions has restructured more than \$2.6 billion in mortgages, including \$26 million in December 2010. Regions has assisted more than 33,000 homeowners with solutions.

In addition, Regions introduced the U.S. Treasury sponsored Home Affordable Modification Program for loans serviced on behalf of Fannie Mae and Freddie Mac back in late March 2009. To date, we have initiated 2,095 trial period modifications for \$319 million, and of those, 1,393 have been completed for \$211 million.

IV. Commercial Lending

A. Commercial and Industrial Lending

Loan demand remained soft in the middle market as the stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$557 million in December as compared to November levels. Commercial line utilization rates decreased slightly in December as compared to November.

In the middle market, lower sales volumes have resulted in lower inventory and accounts receivable financing requirements. Businesses are less likely to invest in or expand their operations given the current economic outlook.

Regions defines small business, in general, as clients with revenues up to \$20 million. Small business lending activity is reflected within our Commercial and Industrial, Commercial Real Estate and First Mortgage outstanding loan balances and production.

We expect small business demand to pick up modestly with improvement in capital investment as consumer spending has shown recent signs of improvement. We still believe business owners will

Name of institution: Regions Financial Corporation

Reporting month(s): December 2010 Submission date: **January 31, 2010**

Person to be contacted regarding this report: David Turner, Chief Financial Officer

remain cautious about adding jobs and expansion even as sales and profits pick up. Small business line utilization rates remained flat in December as compared to November.

B. Commercial Real Estate Lending

The focus in commercial real estate lending continues to be on renewing and restructuring real estate loans with existing clients. Renewal activity includes loan restructuring, remargining and repricing, consistent with the current credit quality of the sponsor, the performance of the project and the current market. As homebuilders sell existing inventory, we continue to convert lot loans to residential construction loans, in turn, reducing our land and lot portfolio.

In December, new loan demand remained low. Developers are reluctant to begin new projects or purchase existing projects under current economic conditions. The demand for financing for purchase of existing properties also remains limited as transaction volume remains low.

V. Treasury Activities

Management of interest rate risk is among the most fundamental tenets in banking. Banking institutions utilize the Available for Sale investment portfolio as a primary tool to balance the inherent interest rate risk arising from core banking activities. Agency Mortgage-Backed securities provided an efficient means to offset asset sensitivity and maintain the desired liquidity profile, while offering a compelling risk adjusted return on the use of capital. Mortgage-Backed security activity in December totaled \$1,360 million, which consists of Government and Agency Fixed-Rate Mortgage-Backed Products.

VI. Equity and Debt Activities at Morgan Keegan

December 2010 saw a near record month of Equity issuance with 112 transactions pricing. Thirty three billion was raised with the largest being HCP Inc. Of the 112 offerings in December, 22 were IPO's. The finance sector led the way with technology coming in second. We look forward to 2011 with optimism, seeing a healthy backlog and a positive market environment. We also think the growth in our research department as well as our investment banking division will garner more activity for Morgan Keegan. The Morgan Keegan Debt department saw strong December volume as was consistent with past years. Municipal issuance in the first quarter of 2011 is expected to slow considerably. However, expect corporate underwriting to remain strong due to a continued favorable rate environment and tightening spreads.

| Name of institution: SunTrust Banks, Inc. | | | | Submission date: 01/28/11 | Person to be contacted about this report: Craig Smith | |
|---|------------|---------------------------|----------|---|--|--|
| , | | | | | | |
| PART I. QUANTITATIVE OVERVIEW | | 2010 | | | | |
| SCHEDULE A: CONSUMER LENDING (Millions \$) 1. First Mortgage | <u>ост</u> | <u>2010</u> <u>NOV</u> | DEC | <u>Kev</u> | Comments | |
| a. Average Loan Balance (Daily Average Total Outstanding) | \$32,805 | \$32,808 | . , | originated as part of a home purchase or refinance transactions. Includes loans retained in | Originations decreased 5% from prior month to \$2.8 billion in December 2010. December refinancings decreased while originations for new purchases increased. Average balances decreased \$30 million in December. | |
| b. Total Originations | \$2,822 | \$2,990 | \$2,841 | Includes all loans originated or purchased by SunTrust through the Retail and Wholesale channels. Volumes include all activity regardless of whether the loans are retained in the loan portfolio, or recorded in loans held for sale and ultimately sold to a third party. | | |
| (1) Refinancings | \$2,179 | \$2,379 | \$2,149 | | | |
| (2) New Home Purchases | \$643 | \$611 | \$692 | | | |
| 2. Home Equity | | | | | | |
| a. Average Total Loan Balance | \$16,623 | \$16,656 | \$16,587 | | Average balances outstanding decreased fractionally in December. Originations increased \$34 million compared to November. The average line utilization rate increased to 55%. | |
| b. Originations (New Lines+Line Increases) | \$147 | \$149 | \$183 | | | |
| c. Total Used and Unused Commitments | \$30,838 | \$30,590 | \$30,409 | | | |
| 3. US Card - Managed | | | | | | |
| a. Average Total Loan Balance - Managed | \$1,059 | \$1,056 | \$1,047 | | December originations decreased to \$12 million. Total line commitments and usage was essentially unchanged from November. Average line utilization remained stable at 28% compared to November. | |
| b. New Account Originations (Initial Line Amt) | \$17 | \$21 | \$12 | SunTrust issues both commercial and consumer credit card lines of credit. New line commitments are recognized when approved and cards are issued. | | |
| c. Total Used and Unused Commitments | \$3,736 | \$3,714 | \$3,708 | This is the line commitment total for all credit card accounts of record. | | |
| 4. Other Consumer | | | | | 1 | |
| a. Average Total Loan Balance | \$14,870 | \$15,018 | \$15,891 | auto), indirect installment loans (auto and marine), and unsecured personal credit lines. | Average balances increased 6% compared to November driven by \$900 million in auto loan purchases fr third party in December. Other Consumer originations decreased \$101 million, or 18%, compared to November. | |
| b. Originations | \$592 | \$577 | \$476 | | | |

| SCHEDULE B: COMMERCIAL LENDING (Millions \$) 1. C & I | <u>OCT</u> | NOV | DEC | <u>Kev</u> | <u>Comments</u> |
|---|------------|---------------------|--------------------|--|---|
| a. Average Total Loan and Lease Balance | \$33,751 | \$33,888 | \$34,057 | Includes average outstandings for Commercial & Industrial loans and leases extended to small business, commercial, middle market, and large corporate clients. | Average loan balances increased \$169 million compared to November. December originations of new commitments increased 100% compared to November and renewing credit facilities increased 88% compared to November. |
| b. Renewal of Existing Accounts | \$1,059 | \$976 | \$1,834 | Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives. | |
| c. New Commitments | \$1,832 | \$1,421 | \$2,840 | Includes new facilities, stand-alone notes, and leases extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives. | |
| 2. Commercial Real Estate | | | | | |
| a. Average Total Loan and Lease Balance | \$18,890 | \$18,592 | \$18,341 | Includes commercial loans secured by owner occupied or non-owner occupied real estate. Includes loans extended for real estate financing as well as loans made for other purposes and collateralized by real estate. | Commercial real estate average balances declined \$251 million in December compared to November. Loan demand has remained soft, although a \$43 million increase in December originations of new and renewing credit facilities resulted in a 9% increase compared to November. |
| b. Renewal of Existing Accounts | \$231 | \$242 | \$284 | Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives. | |
| c. New Commitments | \$150 | \$246 | \$247 | Includes new facilities and stand-alone notes extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives. | |
| SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$) 4. Small Business Loans ³ | | | | | |
| a. Average Total Loan Balance | \$4,777 | \$4,721 | \$4,686 | Average balances and originations include loans originated in the business banking group which includes loans guaranteed by the SBA. Business Banking primarily serves clients with annual sales of \$5 million or less. | The persistent decline in monthly average balances continued as December averages were 1% less than November. Originations were \$40 million in December. |
| b. Originations | \$35 | \$39 | \$40 | | |
| SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$) 1. MBS/ABS Net Purchased Volume | | | | | |
| a. Mortgage Backed Securities | -\$2,201 | \$420 | \$529 | The numbers represent net purchase volume within the reporting period. These securities are reported in SunTrust's available-for-sale and trading portfolios. | In December, SunTrust purchased a net \$529 million of U.S. government and agency issued mortgage-backed securities and transacted net sales of \$19 million of asset backed securities in the available-for-sale and trading portfolios. |
| b. Asset Backed Securities | \$0 | \$0 | -\$19 | The numbers represent net purchase volume within the reporting period. These figures include securities reported in SunTrust's available-for-sale and trading portfolios. | |
| 2. Secured Lending (Repo, PB, Margin Lending) | | | | | |
| a. Average Total Matched Book (Repo/Reverse Repo) ¹ | n/a | n/a | n/a | SunTrust Bank has less than \$50 billion in matched book repos. SunTrust Robinson Humphrey "STRH", an institutional broker dealer, is fully disclosed on the equity side through a third party service provider and does not hold customer accounts. | |
| b. Average Total Debit Balances ² | n/a | n/a | n/a | Although STRH self-clears institutional fixed income transactions, STRH does not carry customer accounts. | |
| 3. Underwriting | | | | | , |
| a. Total Equity Underwriting | \$84 | \$78 | \$37 | Includes total dollars allocated to STRH in equity underwriting transactions that settled within the reporting period. | Total debt underwriting consisted of investment-grade debt of \$349 million, municipal debt of \$545 million and high-yield debt of \$112 million in December. Equity underwriting transactions for December totaled \$37 million. |
| b. Total Debt Underwriting | \$604 | \$1,097 | \$1,006 | Includes total dollars allocated to STRH in investment grade fixed income, high yield fixed income, and municipal debt underwriting transactions that settled within the reporting period. | |
| Notes: 1. Not applicable if matched book activity does not exceed \$50 billion. 2. Applicable only for institutions offering prime brokerage or other margin lending services to c 3. Memoranda: these loans are already accounted for in either consumer lending, commercial le | | and include loans g | uaranteed by the ! | Small Business Administration and/or any other loans that are internally classified as small business loans. | |

Name of institution: **SunTrust Banks, Inc.** Reporting month(s): December 2010

Submission date: 01/28/11

Person to be contacted regarding this report: Craig Smith

PART II. QUALITATIVE OVERVIEW

Please provide a brief overview of the intermediation activity during the month. This discussion should include a general commentary on the lending environment, loan demand, any changes in lending standards and terms, and any other intermediation activity.

SunTrust Banks, Inc., with total assets of \$172.9 billion on December 31, 2010, is one of the nation's largest financial holding companies. Through its banking subsidiaries, the Company provides deposit, credit, trust, and investment services to a broad range of retail, business, and institutional clients. Other subsidiaries provide mortgage banking, brokerage, investment management, equipment leasing, and capital market services. SunTrust operates 1,668 retail branches in Alabama, Arkansas, Florida, Georgia, Maryland, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, West Virginia, and the District of Columbia. In addition, SunTrust services clients in select markets nationally.

Average loans in December, including loans held for sale, totaled \$118.7 billion, increasing \$0.7 billion, or 1%, from November. These totals do not include loans extended to clients and sold to third parties. This fact is particularly relevant when considering the mortgage portfolio, since the majority of new originations and refinanced mortgage loans are sold to third parties. Total new loan originations, commitments, and renewals extended to all borrowers in December totaled \$8.7 billion, an increase of 32% from November, driven mostly by increased Commercial activity.

Consumer Lending

Mortgage originations totaled \$2.8 billion during December, representing a 5% decrease from November. Mortgage refinancings decreased in December by 10%, whereas loans funded for new home purchases increased in December by 13% relative to November. Total average mortgage balances were essentially unchanged from November.

Home equity total used and unused commitments decreased \$181 million representing a decrease of 1% from November. Total equity loan and line originations increased 23% to \$183 million in December demonstrating a moderate increase in demand for credit, while average home equity loan balances decreased \$69 million compared to November as evidence that clients continue to be cautious in managing or extending their debt due to the instability of home valuations.

Credit card balances represent a small percentage of SunTrust's loan portfolio and drive a relatively immaterial percentage of SunTrust's total annual loan originations. In December, new credit card originations totaled \$12 million, with \$10 million related to new consumer accounts and \$2 million related to new business accounts.

Other Consumer loans are primarily composed of student, auto, and other loans. Average Other Consumer loan balances increased \$873 million, or 6%, compared to November due to the purchase of approximately \$900 million in auto loans in December. Indirect auto, student, and other consumer loan originations in December decreased 18% compared to November.

Commercial Lending

Name of institution: **SunTrust Banks, Inc.** Reporting month(s): December 2010

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Average C&I loan balances increased fractionally by \$169 million in December. Total Commercial Lending originations and renewals were \$4.7 billion in December, a 95% increase from November. Renewals of existing credit facilities and stand-alone notes totaled \$1.8 billion in December, an increase of 88% from November, driven largely by quarterly and annual maturities of line commitments. Combined new commitments and new funded loans increased in December by \$1.4 billion, a 100% increase compared to November, as line demand and utilization increased in conjunction with seasonal borrowing.

Commercial Real Estate

Average Commercial Real Estate loans decreased \$251 million, or 1%, compared to the November average. New residential home builder loan demand was negligible and demand for commercial development projects remained low as property values remained depressed and investment activity was limited. In December, Commercial Real Estate renewals of existing accounts increased \$42 million, or 17%, while new Commercial Real Estate commitments were essentially unchanged from November. The majority of originations were associated with large commercial or corporate businesses.

Small Business Lending

Most small business loans are originated in the business banking group which primarily serves clients with annual sales of \$5 million or less. In December, the average loan balance was \$4.7 billion, down 1% from November. December originations increased fractionally from November to \$40 million.

Other Intermediation Activities

Beyond lending to consumers and businesses, SunTrust participates in various additional intermediation activities. In December, SunTrust had \$529 million in net purchases of U. S. government and agency issued mortgage-backed securities and \$19 million in net sales of asset backed securities in the available for sale and trading portfolios.

SunTrust participated in twenty-nine debt issues in December with a total notional value of \$8.5 billion. SunTrust's allocation of underwritten debt included \$349 million in investment-grade issues, \$545 million in municipal debt issues and \$112 million in high-yield debt issues, which in the aggregate was \$91 million below November totals.

In December, SunTrust participated in three equity offerings with a total notional value of \$2.1 billion, of which our allocation was \$37 million.