



Results of the Second Annual SBLF Lending Survey



OVERVIEW

Small businesses are a vital part of the American economy and their success is a critical component of the economic recovery. Established by the Small Business Jobs Act of 2010 (the Act), the Small Business Lending Fund (SBLF) is a dedicated fund designed to provide capital to qualified community banks¹ and community development loan funds (CDLFs) in order to encourage small business lending. The purpose of the SBLF is to encourage Main Street banks and small businesses to work together, help create jobs, and promote economic growth in communities across the nation.

This report provides information from participants on their small business lending, use of SBLF funding, loan demand, credit standards, obstacles to small business lending, and outreach to small businesses in their communities. For the year ended June 30, 2013, SBLF participants reported the following on small business lending.

- **SBLF participants have increased small business lending by an estimated 56,200 additional loans as of March 31, 2014.** As reported in the *July 2014 SBLF Lending Growth Report*, SBLF participants have increased their small business lending by \$12.4 billion over a \$33.1 billion baseline. Based on benchmarks from the lending survey, this \$12.4 billion increase represents an estimated 56,200 additional loans to small businesses, an increase of 48 percent over last year.
- **Nearly 80 percent of small business loans made by SBLF participants were made in amounts of \$250,000 or less.** Over half of all loans (51 percent) carried a term of more than two years. A majority of loans (58 percent) used an adjustable rate, with an average rate of 3.8 percent at the time of origination, down from 5.3 percent last year.
- **Small businesses in a wide array of industries have benefited from the increased lending by SBLF participants.** Companies in the service and retail sectors received the largest estimated percentage of new loans. Every region² of the country has benefited, with participants in the South and Midwest reporting the largest estimated increases in the number of small business loans (34,800 and 24,500 loans, respectively), followed by the West (9,100 loans) and the Northeast (6,700 loans). In last year's survey, participants reported that companies in the service and agriculture sectors received the largest estimated percentage of new loans.
- **Over 90 percent of participants reported for the second year in a row that they were able to increase small business lending with SBLF funding.** Participants also reported that SBLF funding supported other business lending (57 percent) and non-business lending (33 percent). These uses of SBLF funding were broadly consistent across geographic regions. In last year's survey, participants reported that SBLF funding also supported other business lending (50 percent) and non-business lending (31 percent).

¹ In this report, the terms "banks" and "community banks" encompass banks, thrifts, and bank and thrift holding companies with consolidated assets of less than \$10 billion.

² In this report, the Midwest region includes: IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI. The Northeast region includes: CT, ME, MA, NH, NJ, NY, PA, VT. The South region includes: AL, AR, DE, DC, FL, GA, KY, LA, MD, MS, NC, OK, SC, TN, TX, VA, and WV. The West region includes: AZ, CA, CO, ID, MT, NM, NV, OR, UT, WA, and WY.



- **SBLF participants reported that demand for small business loans remains strong.** Thirty-six percent of SBLF participants reported stronger loan demand, 55 percent reported no change, and nine percent reported weaker demand, vs. 46 percent stronger demand, 40 percent unchanged, and 14 percent weaker demand last year. Participants also reported a net increase in the number of inquiries from small business borrowers regarding the availability and terms of new lending.
- **Participants reported that they have generally not changed credit underwriting standards, although some institutions have reduced the interest rate spread charged to borrowers, among other items.** A significant majority of participants (90 percent) reported that credit standards for approving small business lending remain basically unchanged, with six percent reporting eased standards and three percent reporting tightened standards, for a net change of three percent overall eased credit standards. Participants also reported that some terms for loans that they are willing to approve have changed over the year, with the largest net percentage (32 percent) reporting smaller, or narrower spreads. Significant majorities of participants reported that returns, collateral, and risks have been obstacles to increasing small business lending.
- **Ninety-four percent of SBLF participants reported engaging in outreach or advertising activities targeting women, veteran, or minority communities and 49 percent of their outreach spending was allocated to activities targeting these groups.** Among SBLF participants, 82 percent report that they are members or participate in community organizations and/or trade associations that target women, veteran, or minority communities and 57 percent used paid advertisement or notices in print, radio, or electronic media to target women, veteran, or minority communities. Of the \$19 million that SBLF participants reported spending on small business lending outreach activities, 49 percent was allocated to outreach activities targeting women, veteran, and minority communities.
- **Eighty-one percent of banks that reported that they are planning to redeem expect to exit the program by the end of Q1 2016, the quarter in which the statutorily-required bank step up rate of nine percent begins.**³ Ninety percent of CDLFs that plan to redeem expect to exit by the end of Q3 2019, the quarter in which the CDLF step up rate of nine percent begins.
- **Of the 83 percent of participants who reported a factor that influenced their institution's anticipated timing for exiting the SBLF program, 92 percent cited the step up rate as the reason for redeeming.** Sixty-six percent of participants reported that they plan to replace the SBLF capital with retained earnings.

³ Four banks have a step up rate in Q4 2015; the step up rate for S corporations and mutual institutions is 13.8 percent. The rate step-ups are required by the Small Business Jobs Act ("the Act," P.L. 111-240), which established the SBLF. Specifically, Section 4103 (d)(5)(E) increases the dividend or interest rate for an SBLF bank to nine percent at the end of the four and one-half year period that begins on the date of the capital investment under the Program. Section 4013 (d)(5)(I) increases the interest rate for an SBLF CDLF to nine percent after an eight-year period.



BACKGROUND

The SBLF Lending Survey is an annual information collection required of all institutions participating in the program. Under Section 3.1(c)(ii)(D) of the Securities Purchase Agreement, institutions participating in the SBLF are required to complete an annual survey. This report is published by Treasury using aggregated survey responses.

This report includes the results of the program's second annual survey. The survey was distributed to SBLF participants in January 2014 and covers small business lending activities during the period from July 1, 2012 to June 30, 2013. The survey included 17 questions on topics including small business lending policies and practices, use of SBLF funding, outreach to small businesses, and repayment of SBLF funding. Responses were received from the 299 institutions participating in SBLF as of the survey administration, including 249 community banks and 50 CDLFs. Please see "Appendix A" for additional information regarding the methodology employed in this report.

Treasury invested over \$4.0 billion in 332 institutions through the SBLF program. These amounts included investments of \$3.9 billion in 281 community banks and \$104 million in 51 CDLFs. Collectively, these institutions operate in over 3,000 locations across 47 states and the District of Columbia. This report includes information on the 299 institutions that completed the survey, including 249 community banks and 50 CDLFs.

The initial disbursement of SBLF funding occurred on June 21, 2011, with subsequent transactions completed thereafter until the program's September 27, 2011 statutory funding deadline. As of June 30, 2014, 39 institutions with aggregate investments of \$589 million fully redeemed their SBLF securities and exited the program, and 19 institutions partially redeemed \$138 million (or 47 percent of their SBLF securities) though continue to participate in the program.

The SBLF program encourages lending to small businesses by providing capital to community banks and CDLFs with less than \$10 billion in assets.

- For community banks, the SBLF program is structured to encourage small business lending through a dividend or interest rate incentive structure. The initial rate payable on SBLF capital is, at most, five percent, and the rate falls to one percent if a bank's small business lending increases by 10 percent or more.⁴ Banks that increase their lending by amounts less than 10 percent pay rates between two percent and four percent. If a bank's lending does not increase in the first two years, however, the rate increases to seven percent. If a bank has not repaid the SBLF funding after four and a half years, the rate increases to nine percent.
- For CDLFs, the SBLF program is structured to encourage small business lending through access to low-cost capital at a two percent interest rate. These non-profit loan funds play a critical role in distressed communities across the country that lack access to mainstream financial services. CDLFs engage in activities including offering microloans to entrepreneurs, providing mezzanine debt to growing small businesses, and financing community facilities like charter schools and health clinics.

⁴ The initial interest rate paid by S corporations and mutual institutions is, at most, 7.7 percent. If these institutions increase their small business lending by 10 percent or more, then the rate falls to as low as 1.5 percent. These interest rates equate to after-tax effective rates (assuming a 35% tax rate) equivalent to the dividend rate paid by C corporation participants.



As established in the Act and described above, the SBLF program operates through an indirect mechanism to achieve policy outcomes. The additional lending capacity provided by SBLF capital – coupled with the program’s dividend or interest rate incentives in the case of community banks – encourages institutions to increase small business lending. Because of the program’s structure, increases in small business lending cannot be directly linked to the use of SBLF funds. However, the program’s impact can be observed indirectly. For additional information regarding the methodology employed in this report, please see Appendix A.



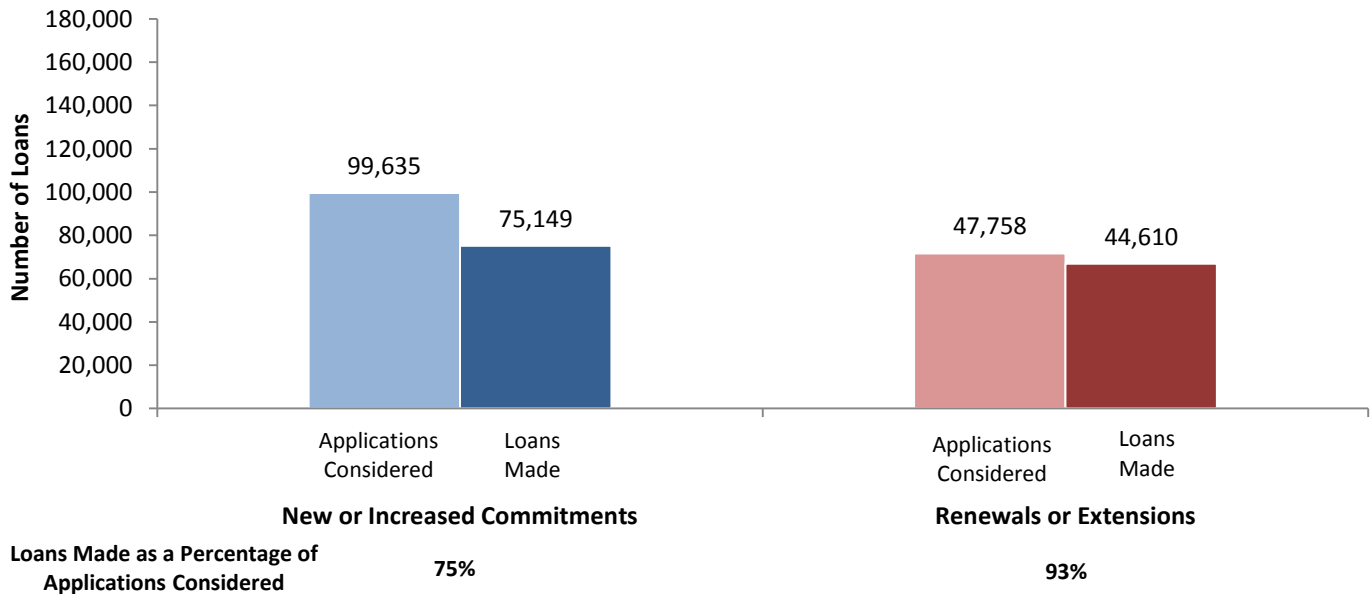
SMALL BUSINESS LENDING BY PARTICIPANTS

As reported in the *July 2014 SBLF Lending Growth Report*, SBLF participants increased their small business lending by \$12.4 billion over a \$33.1 billion baseline as of March 31, 2014. Based on the average loan size reported by participants, this \$12.4 billion increase represents an estimated 56,200 additional loans to small businesses, with approximately 80 percent of those loans made in amounts of \$250,000 or less.⁵ Small businesses in a wide array of industries have benefited from the increased lending by SBLF participants, with companies in the service and retail sectors receiving the largest estimated percentage of new loans. Every region of the country has benefited, with participants in the South and Midwest reporting the largest estimated increases in the number of small business loans (34,800 and 24,500 loans, respectively), followed by the West (9,100 loans) and the Northeast (6,700 loans). The following section includes additional detail on small business lending by participants, including loan applications, number and dollar value of loans made, loan terms, and interest rates.

Small Business Loans Considered and Made by Participants

For the year ended June 30, 2013, participants reported that they approved and funded over 80 percent of the applications they considered for small business loans, including 75 percent of the applications for new lending commitments or increases in outstanding lending commitments and 93 percent of the applications for renewals or extensions.⁶ The following graph shows the number of small business loan applications considered and loans made by participants.

**Number of Small Business Loan Applications Considered and Loans Made
(From July 1, 2012 to June 30, 2013)**



⁵ The number of additional small business loans is calculated by dividing each participant’s change in small business lending as of December 31, 2013 by the average loan size the participant reported on its SBLF lending survey for the year ended June 30, 2013 and aggregating the resulting loan counts. The resulting aggregate is rounded to the nearest hundred loans.

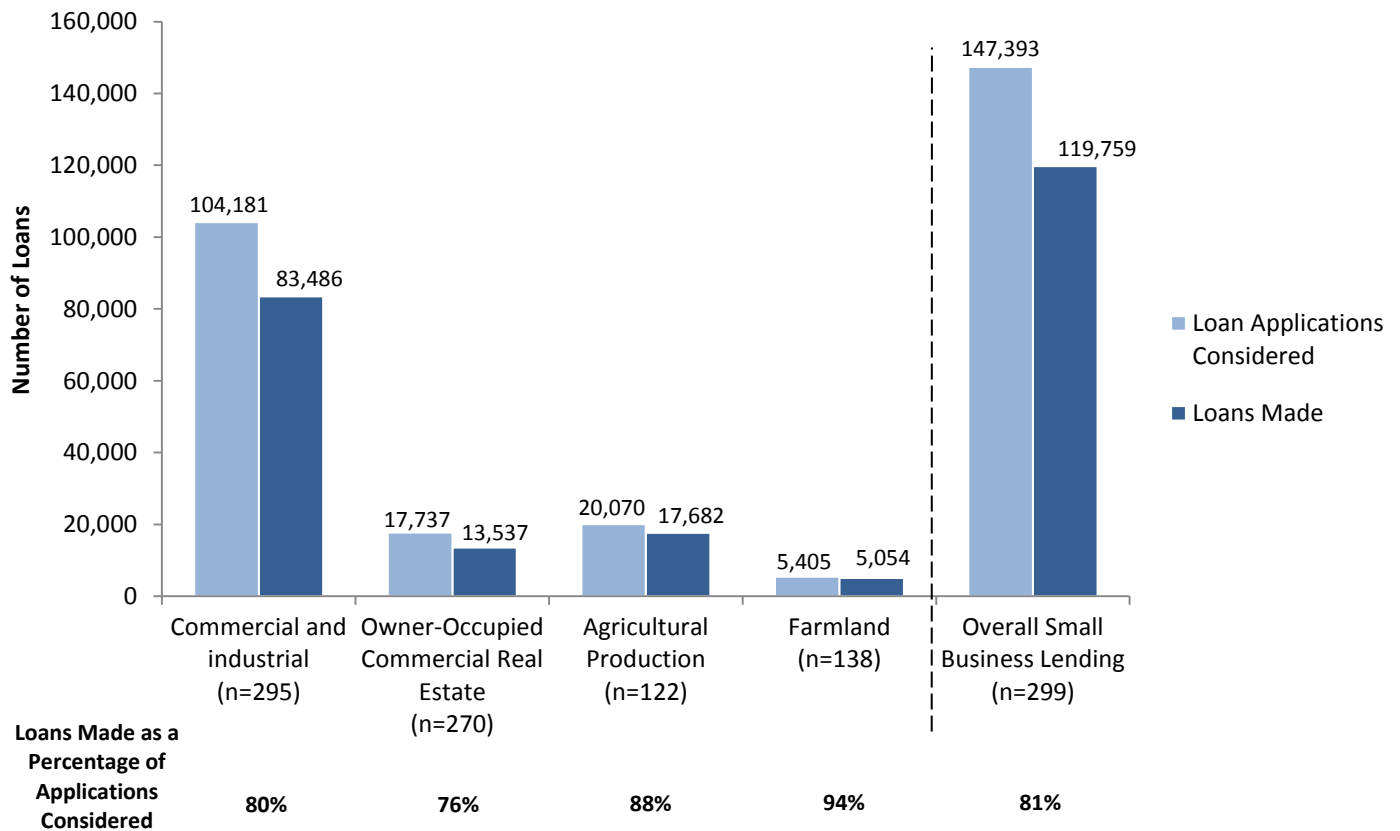
⁶ Lending commitments include loans (or credit lines) that were closed over the past year, whether or not they were funded.



Of the loans made, approximately 60 percent were for loans that represent new or increased commitments by participants. These results were similar across the four categories of small business lending, with the largest percentage of new loans or increased funding commitments coming from owner-occupied commercial real estate (71 percent), followed by farmland (71 percent), agricultural production (58 percent), and commercial and industrial (56 percent) loans.

Approximately 71 percent of all small business loan applications considered and 70 percent of small business loans made were for commercial and industrial purposes. Loans supporting farmland and agricultural production and evidenced the highest percentage of loans made as a fraction of applications considered at 94 percent and 88 percent, respectively. The following graph shows the total number of small business loan applications considered and made across the four categories of small business lending.

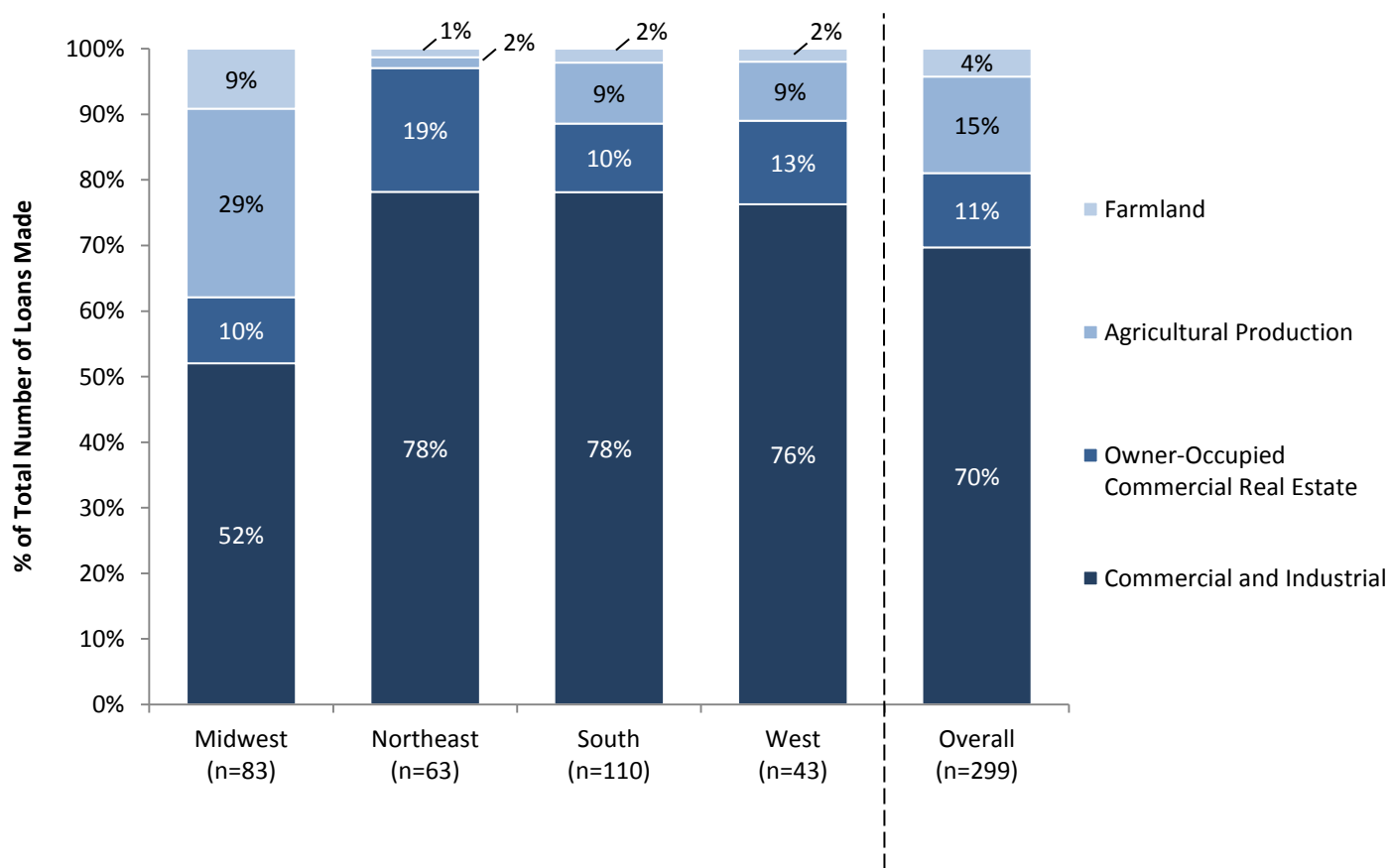
Number of Small Business Loan Applications Considered and Loans Made by Loan Type
(From July 1, 2012 to June 30, 2013)



Small Business Loans by Loan Type and Regional Geography

Participants reported that the largest percentage of small business loans they made by number were commercial and industrial loans (70 percent), followed by agricultural production (15 percent), owner-occupied commercial real estate (11 percent), and farmland (four percent). The percentages were similar across regional geography, although institutions in the Midwest made a relatively smaller percentage of commercial and industrial loans (52 percent) and a relatively larger percentage of loans supporting agricultural production and farmland (29 percent and nine percent, respectively). The following graph shows the percentage of small business loans made across the four categories of small business lending by regional geography.

Percentage of Small Business Loans Made by Loan Type and Regional Geography
(From July 1, 2012 to June 30, 2013)

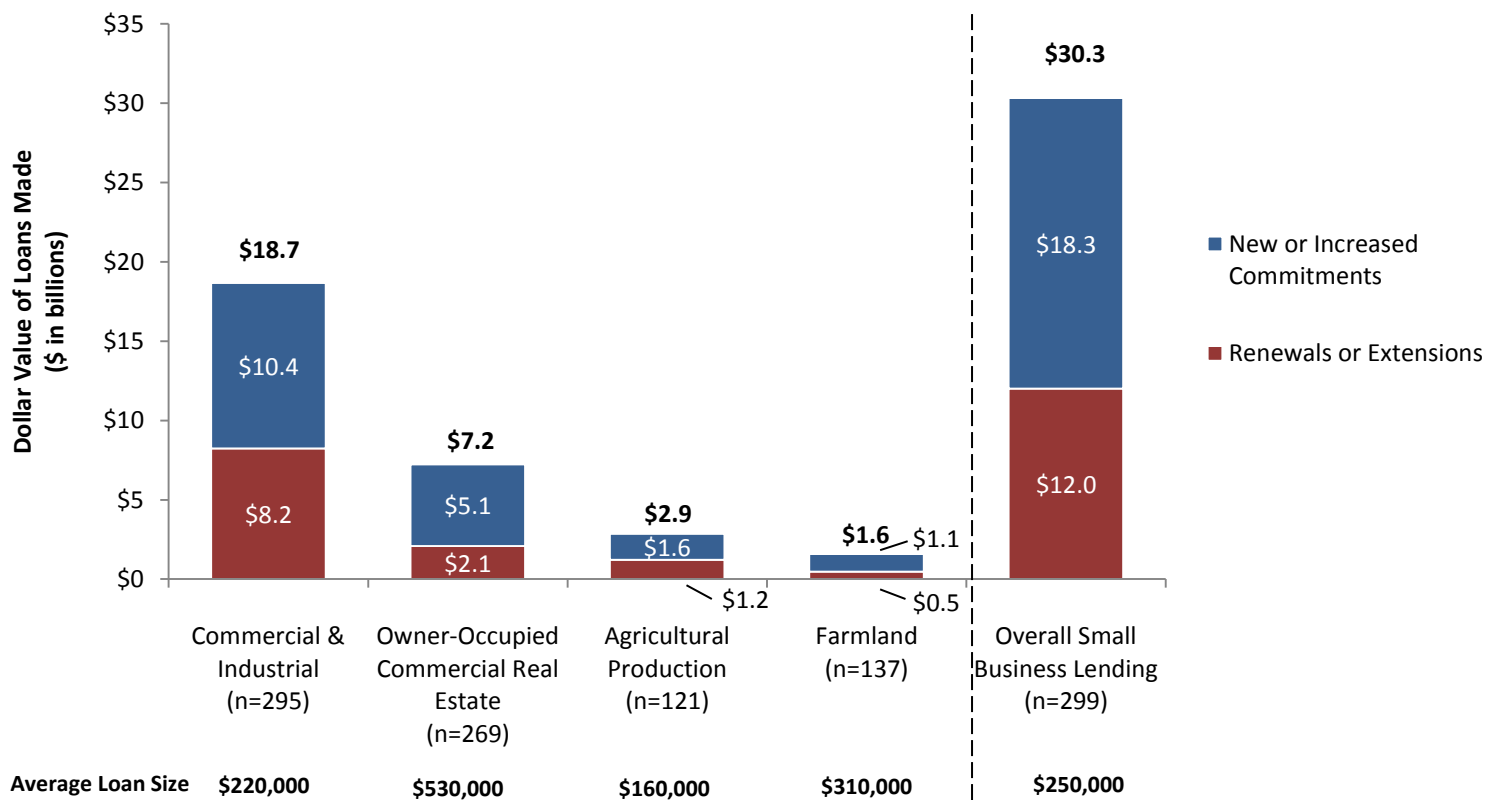


Dollar Value of Small Business Loans Made by Participants

For the year ended June 30, 2013, participants reported extending approximately \$30.3 billion in loans that qualified as small business lending. This lending includes approximately \$18.3 billion (60 percent) in new or increased lending commitments and \$12.0 billion (40 percent) in renewals or extensions. Across the four categories of small business lending, participants reported \$18.7 billion in commercial and industrial loans (61 percent), \$7.2 billion in owner-occupied commercial real estate loans (24 percent), \$2.9 billion in agricultural production loans (10 percent), and \$1.6 billion in farmland loans (5 percent).

Participants also reported that owner-occupied commercial real estate loans had the largest average dollar value at approximately \$530,000, followed by farmland loans at \$310,000, commercial and industrial loans at \$220,000, and agricultural production loans at \$160,000. The following graph shows the dollar value of small business loans made by participants across the four categories of small business lending.

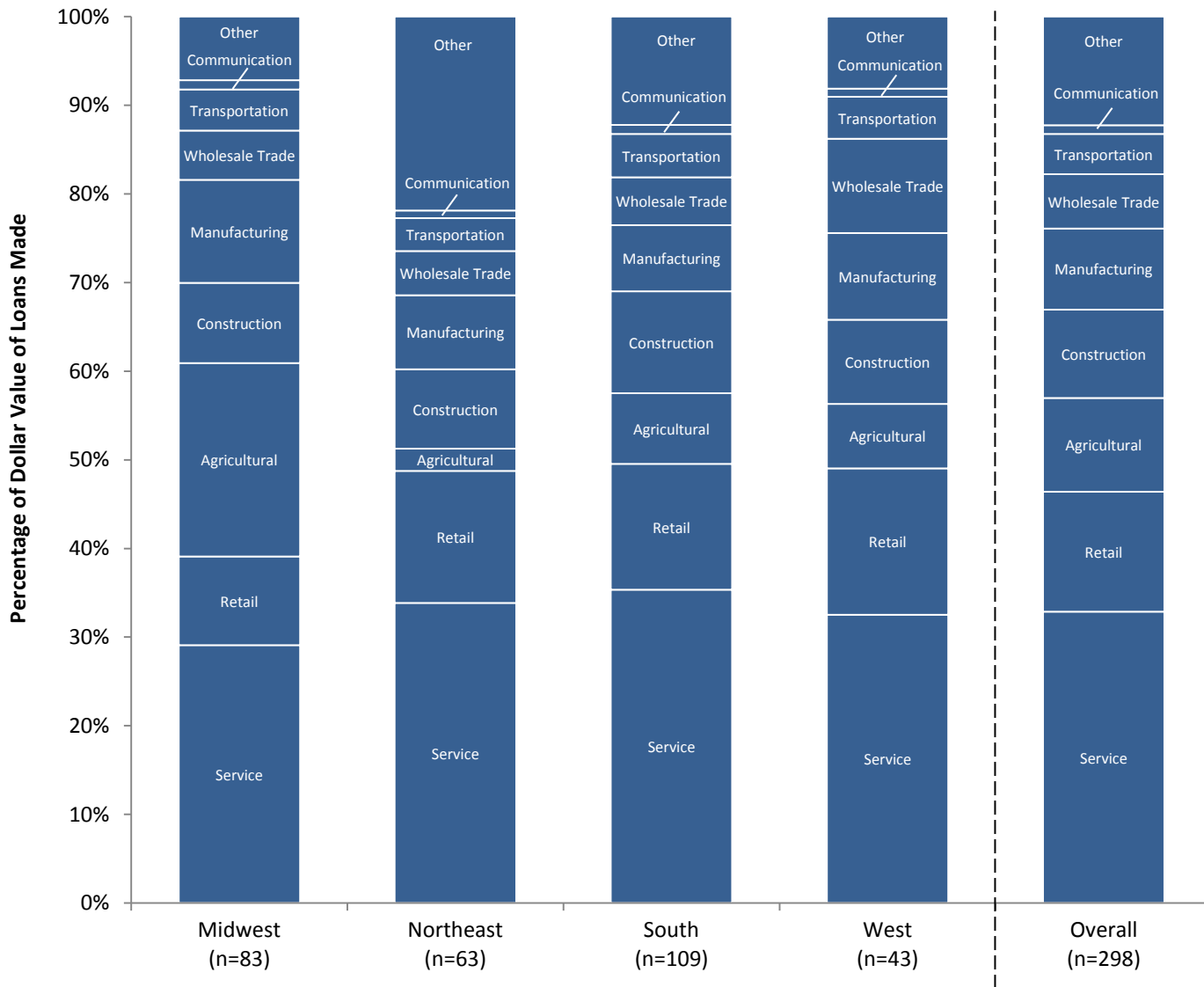
Small Business Lending by Loan Type
(From July 1, 2012 to June 30, 2013)



New or Increased Small Business Lending by Industry

As noted, participants reported that they have made \$18.3 billion in new or increased small business loan commitments. The following graph shows the percentage of the dollar value of loans made across industries by regional geography.

Percentage of New Small Business Lending Across Industries by Regional Geography
(From July 1, 2012 to June 30, 2013)



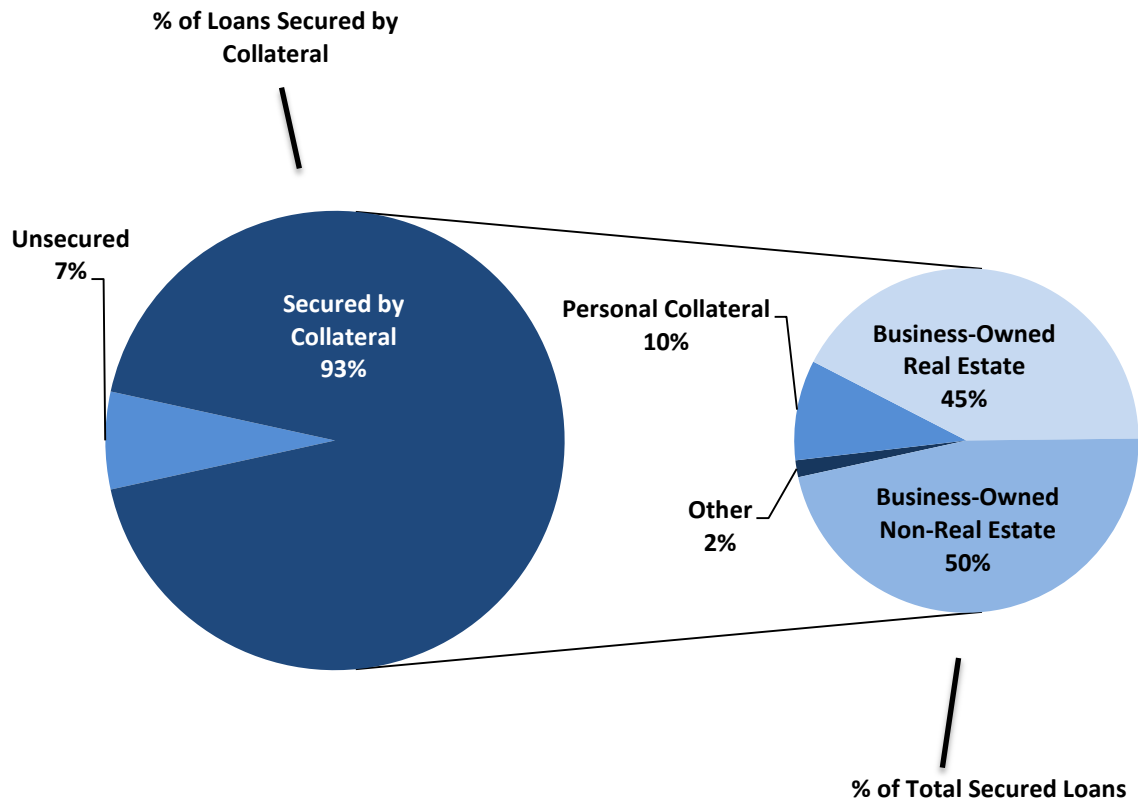
The participants that noted “other” categories of small businesses indicated in their qualitative descriptions that these included real estate, recreation, mining, energy, and education, among others.



Percentage of Total Dollar Value and Category of Loans Secured by Collateral

For the year ended June 30, 2013, participants reported extending approximately \$30.3 billion in loans that qualified as small business lending. This lending includes approximately 93% of the total dollar value of those loans (or credit lines) that qualify as small business lending and that were approved and funded by the institution that were secured by collateral. For those loans (or credit lines) that were made by SBLF institutions that were secured by collateral, participants estimated that those loans were primarily secured by the following categories of collateral: business-owned non-real estate (50 percent), business-owned real estate (45 percent), and personal collateral (10 percent).⁷

Total Dollar Value of Funded Loans (or Credit Lines) Secured by Collateral and the Categories of Collateral Used to Secure those Loans (or Credit Lines)
(From July 1, 2012 to June 30, 2013)



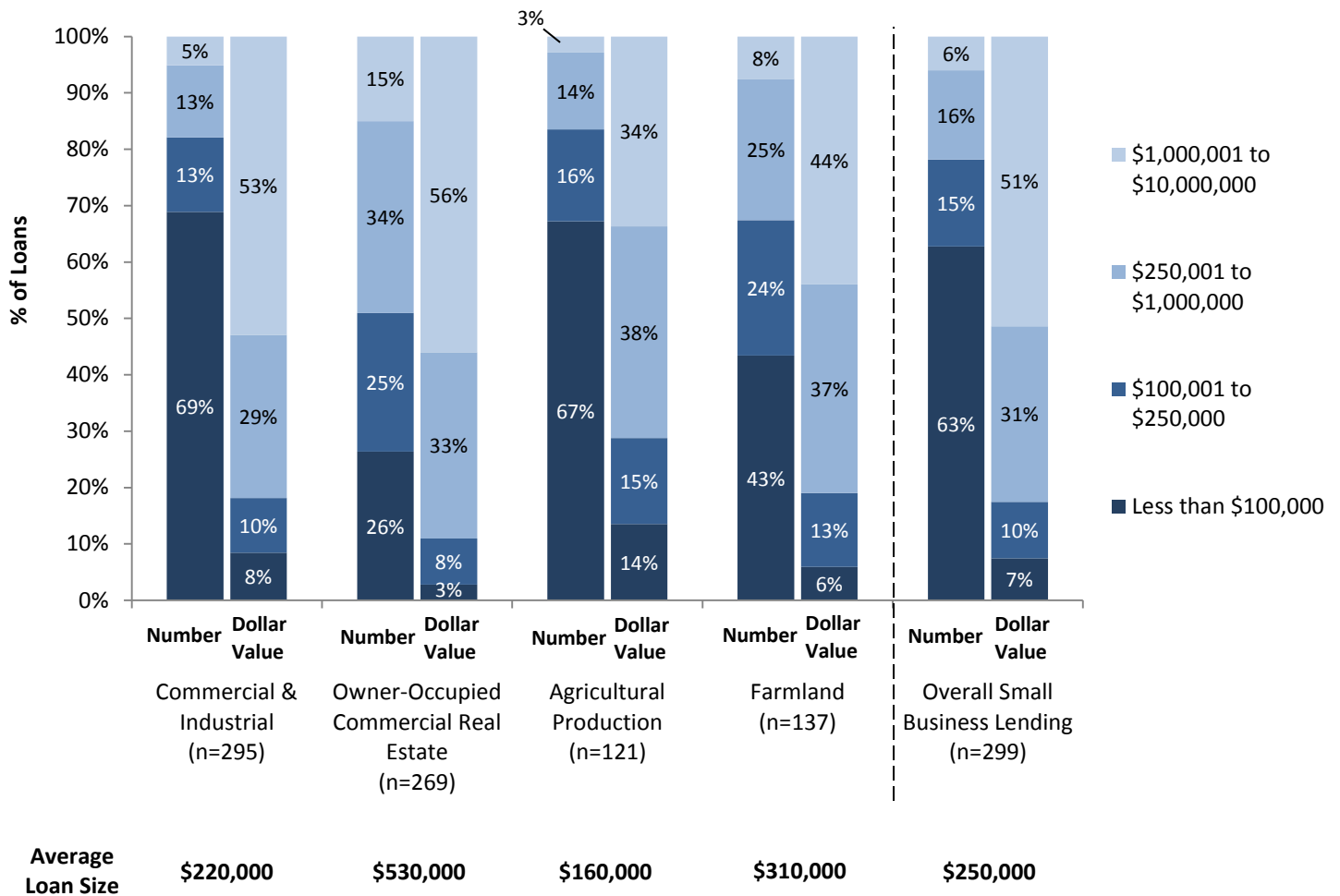
⁷ The sum of the percentages were allowed to exceed 100 percent, since some loans were secured by more than one type of collateral.



Small Business Loans Made by Loan Size

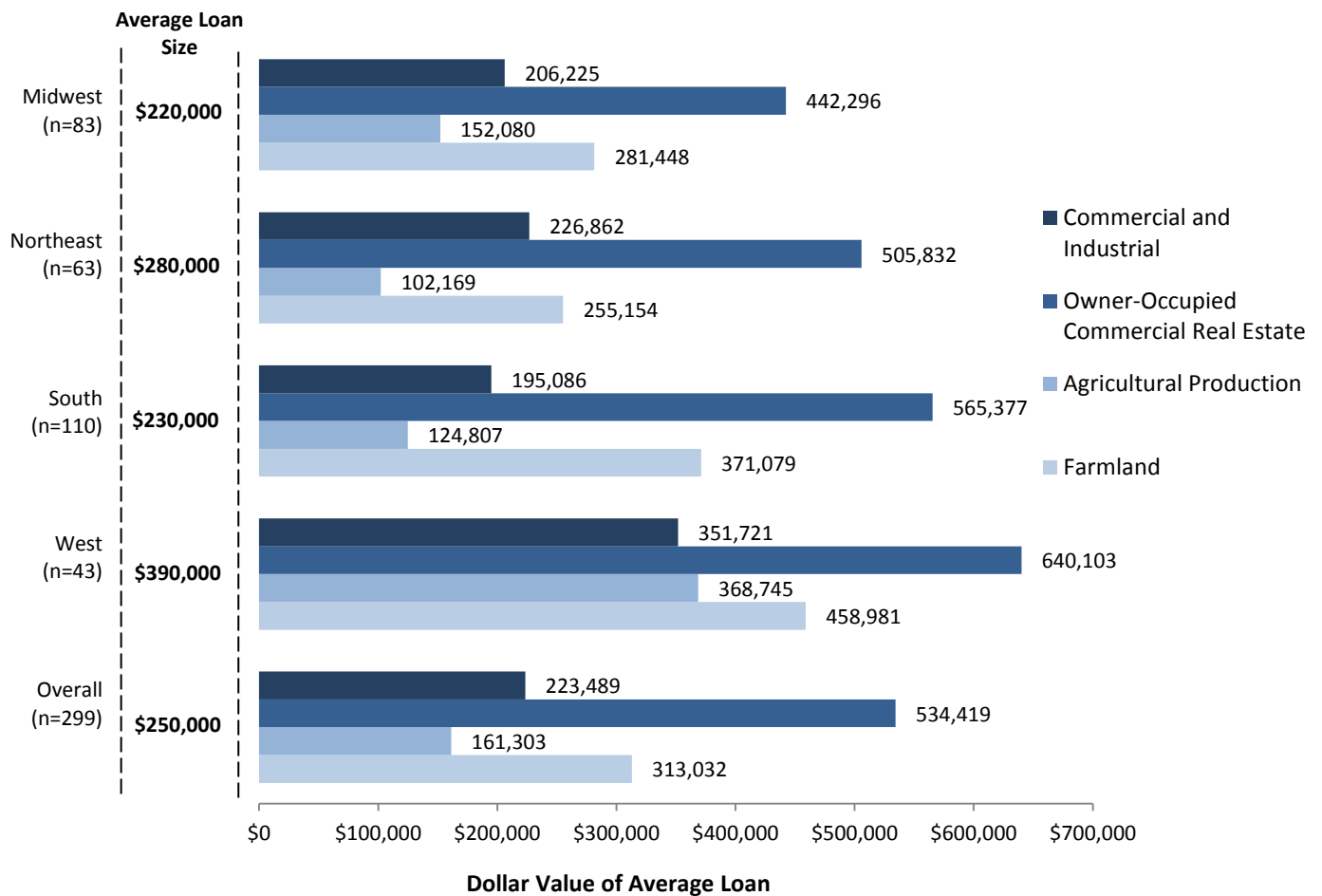
For the year ended June 30, 2013, participants reported that approximately 78 percent of the 119,759 loans they made were for dollar values of \$250,000 or less, representing approximately \$5.3 billion in small business lending. Similarly, approximately 94 percent of the loans were for dollar values of \$1 million or less, representing \$14.7 billion in small business lending. The following graph shows the relationship between the percentage of the number and dollar value of small business loans by size across the four categories of small business lending.

Percentage of Small Business Loans Made by Loan Size and Loan Type
(From July 1, 2012 to June 30, 2013)



By regional geography, participants reported the largest average dollar value of small business loans in the West (\$390,000), followed by the Northeast (\$280,000) and the South and Midwest (\$230,000 and \$220,000, respectively). The significantly larger average in the West reflects a concentration of owner-occupied commercial real estate loans with an average dollar value of \$640,103 compared to \$565,377 in the South, \$505,832 in the Northeast, and \$442,296 in the Midwest. The following graph shows the average dollar value of each of the four categories of small business loans by regional geography.

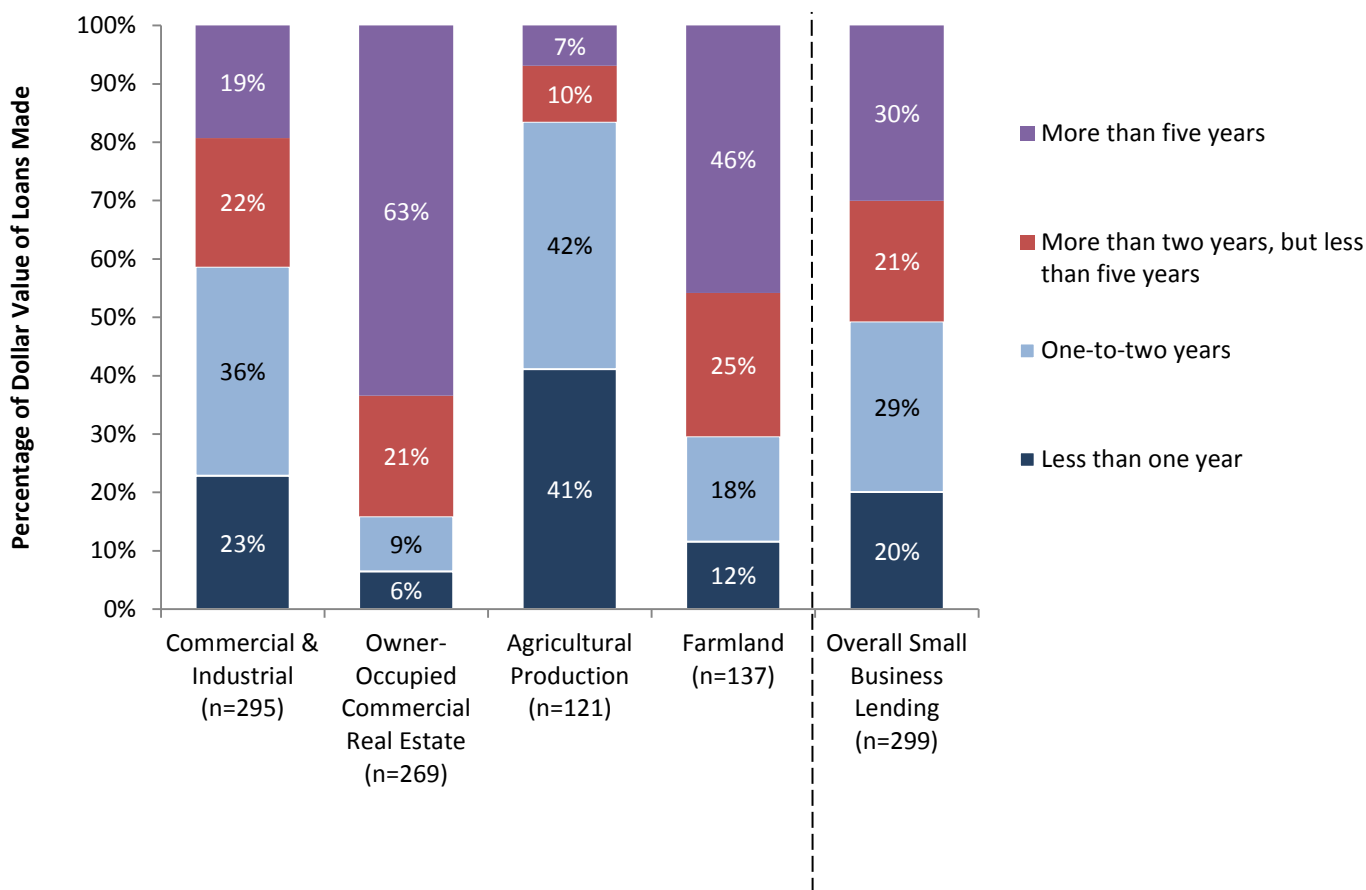
Average Dollar Value of Small Business Loans by Loan Type and Regional Geography
(From July 1, 2012 to June 30, 2013)



Length of Term for Small Business Loans

For the year ended June 30, 2013, participants reported that 51 percent of the small business loans they made were for a term of more than two years, 29 percent were for one to two years, and 20 percent were for less than one year. These varied significantly among loan type, with a larger percentage of secured loans (owner-occupied commercial real estate and farmland) evidencing longer terms. The following graph shows the percentage of the dollar value of small business loans by length of term across the four categories of small business lending.

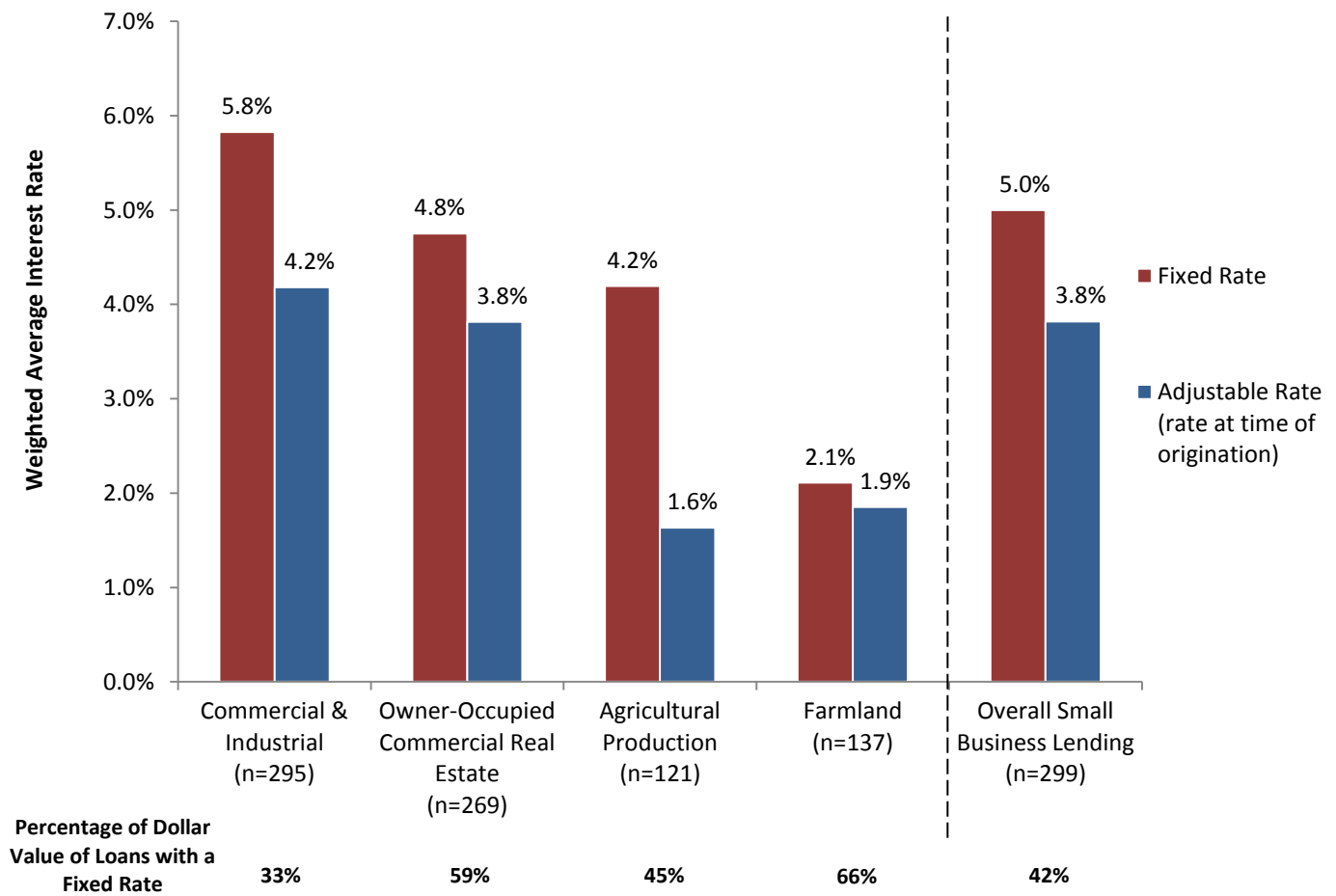
Percentage of Small Business Loans Made by Length of Term and Loan Type
(From July 1, 2012 to June 30, 2013)



Weighted Average Interest Rates for Small Business Loans

For the year ended June 30, 2013, participants reported that 58 percent of their small business lending had an adjustable interest rate at the time of origination, with 42 percent using a fixed rate. The weighted average interest rate⁸ for adjustable rate loans was approximately 3.8 percent, while the weighted average fixed rate was 5.0 percent. These results were similar across the four categories of small business lending, with commercial and industrial lending reporting slightly higher interest rates and agricultural production and farmland lending reporting slightly lower rates. The following graph shows the weighted average interest rates for small business loans across the four categories of small business lending.

Weighted Average Interest Rates for Small Business Loans by Loan Type
(From July 1, 2012 to June 30, 2013)



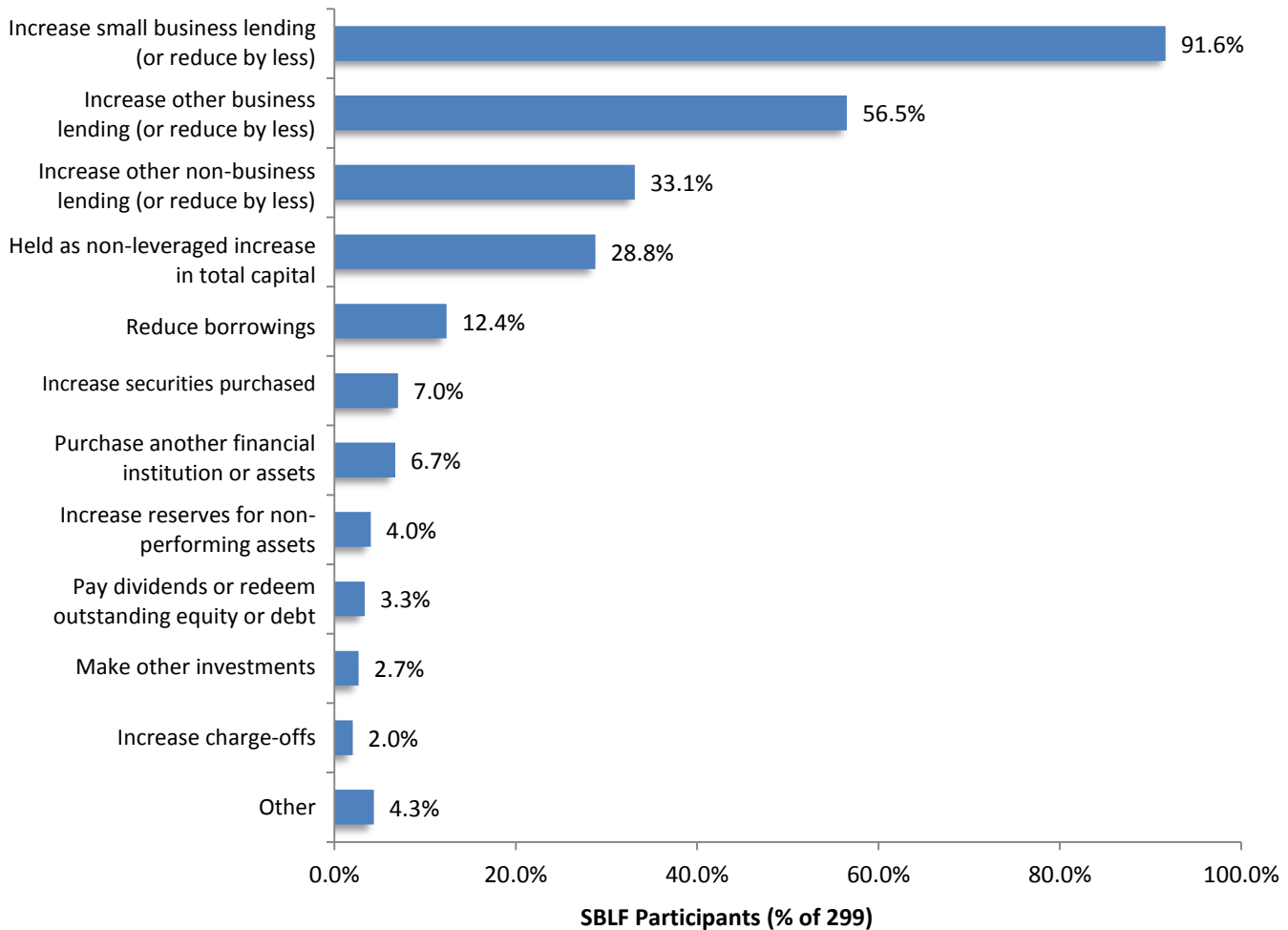
⁸ To calculate the weighted average rates on overall small business lending, Treasury calculated the average rate in each category and weighted the results by the dollar amount of lending in each category.



PARTICIPANT USE OF SBLF FUNDING

For the year ended June 30, 2013, a significant majority of participants (almost 92 percent) reported that they were able to increase small business lending (or reduce it by less than otherwise would have occurred) with SBLF funding. In addition, 57 percent of participants reported that they were able to increase other business lending and 33 percent reported they were able to increase non-business lending (or, in each case, reduce it by less than otherwise would have occurred) with SBLF funding.⁹ The following graph shows the percentage of participants that reported action(s) that they were able to take that may not have been taken without SBLF funding.

**Actions Taken by SBLF Participants
(From July 1, 2012 to June 30, 2013)**



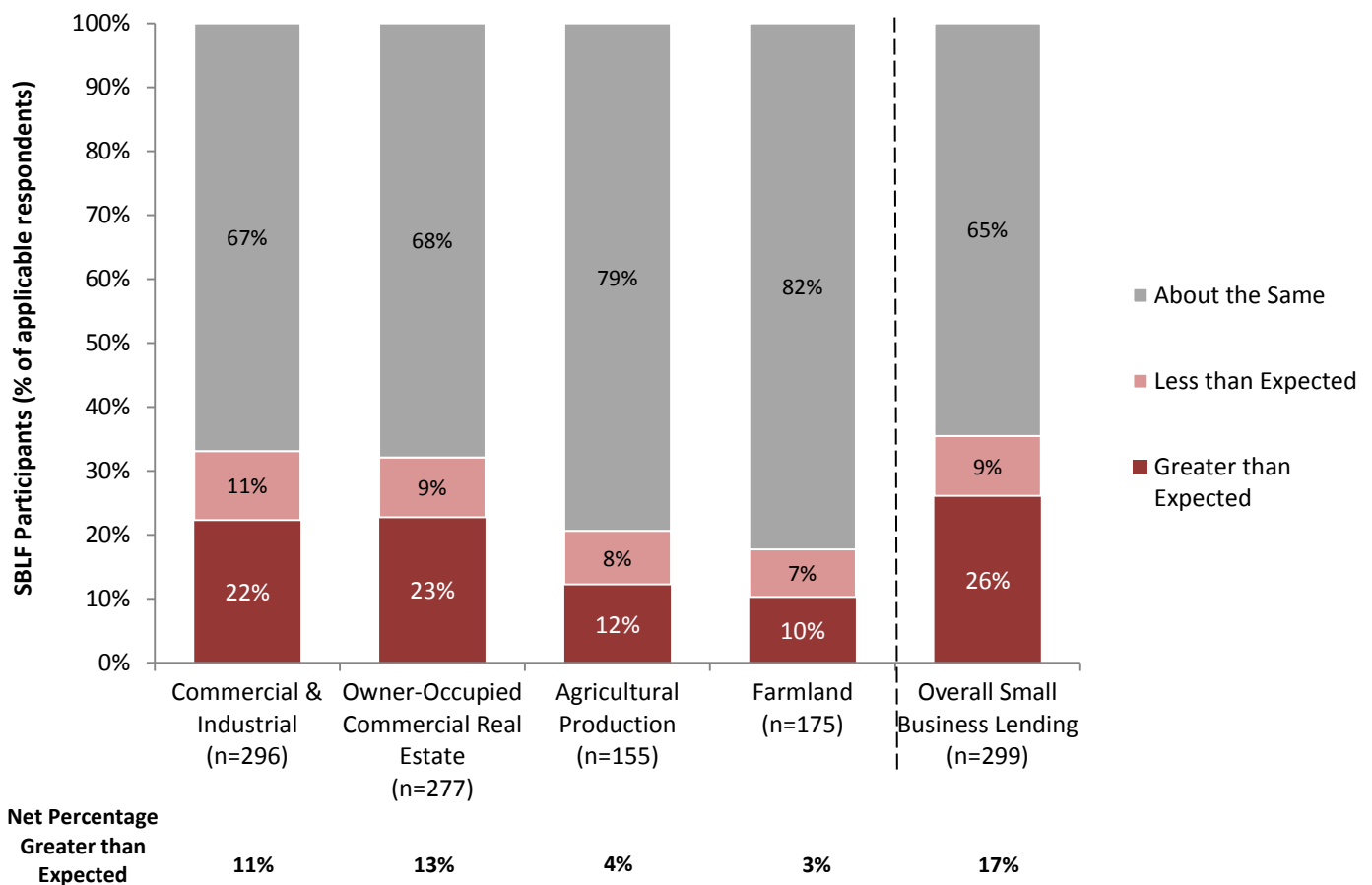
⁹ The question noted that cash associated with SBLF funding may not be readily distinguishable from other cash sources and that institutions may need to estimate how the SBLF funding was deployed or how many dollars were allocated to each use.



Net Percentage Increase of Lending Relative to Expectations Since SBLF Investment

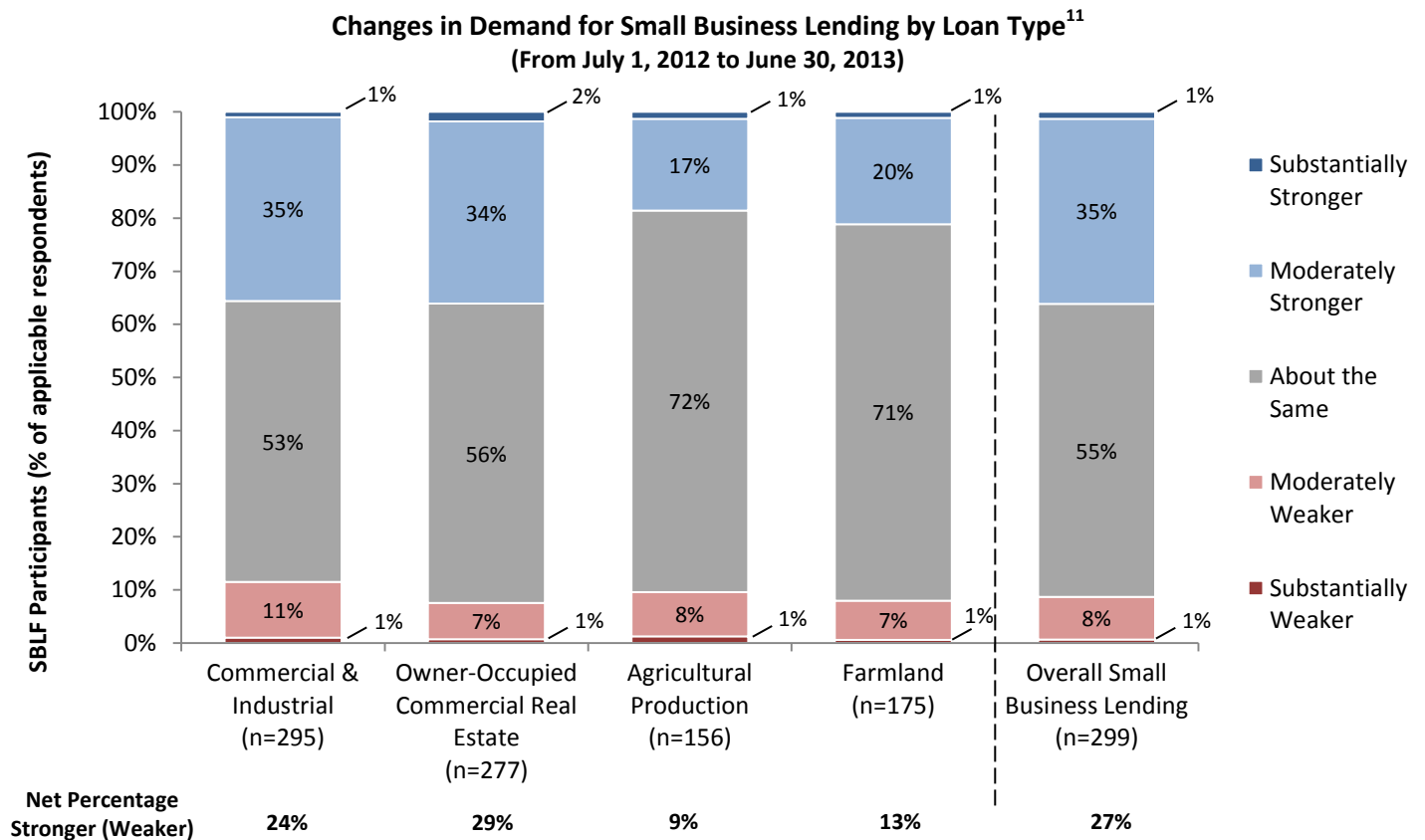
For the year ended June 30, 2013, more than a quarter of participants (26 percent) reported that they were able to increase small business lending by more than they expected with SBLF funding since the time of investment. In addition, 65 percent of participants reported that their institution increased business lending by about the same amount as it expected over this period, and nine percent reported an increase in their small business lending by less than expected. The following graph shows the percentage of participants' responses relative to their expectations at the time they received the SBLF investment.

**Actions Taken by Participants' Percentage Change in Qualified Small Business Lending
(From July 1, 2012 to June 30, 2013)**



DEMAND FOR SMALL BUSINESS LENDING

For the year ended June 30, 2013, participants reported net stronger demand for small business lending, with 36 percent reporting stronger demand compared to nine percent reporting weaker demand (net 27 percent reporting stronger demand).¹⁰ The results are similar across the four categories of small business lending, with the largest net percentages of participants reporting stronger demand for owner-occupied commercial real estate loans (net 29 percent) and commercial and industrial loans (net 24 percent). Participants also reported net stronger demand for agricultural production and farmland loans (net nine percent and net 13 percent, respectively). The following graph shows the percentage of participants that reported changes in demand for small business lending by loan type.



Across regional geography, the largest net percentage of participants reporting stronger demand was in the West (net 37 percent), followed by the Midwest (net 28 percent), the South (net 26 percent), and the Northeast (net 22 percent).

¹⁰ For questions that ask about loan demand in this report, reported net percentages equal the percentage of participants that reported stronger demand (“substantially stronger” or “moderately stronger”) minus the percentage of participants that reported weaker demand (“substantially weaker” or “moderately weaker”).

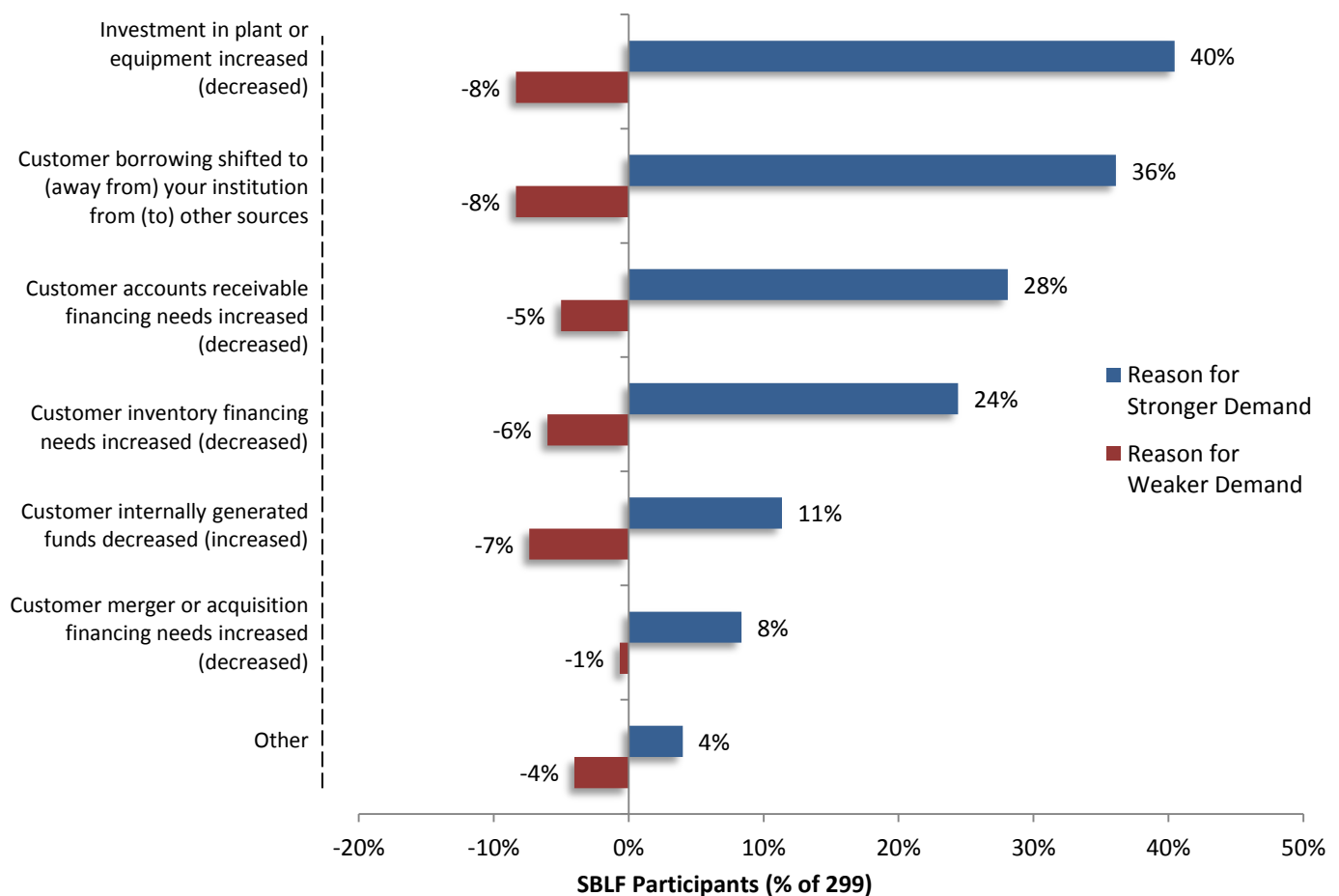
¹¹ In responding to the survey, participants reported on changes in loan demand for each of the four small business loan types and, separately, for overall small business lending. In some cases, participants reported that demand for overall small business lending was “moderately stronger,” but did not attribute the stronger demand to one of the four loan types.



Reasons for Changes in Small Business Loan Demand

Of the 108 participants (36 percent) that reported stronger demand for small business lending, the most commonly cited reasons were that the borrower (i) increased their investment in plant or equipment, (ii) shifted their borrowing from a less attractive source, and (iii) increased their accounts receivable financing. The 26 participants (nine percent) that reported weaker demand for small business lending most commonly cited (i) decreased investment in plant or equipment, (ii) shifted their borrowing to a more attractive source, and (iii) customer internally generated funds increased. The following graph shows the percentages of participants that reported certain reasons for change in small business loan demand, with positive figures indicating the responses of institutions that reported stronger demand and negative figures showing the responses of institutions that reported weaker demand.

Percentage of Participants Reporting Reasons for Change in Small Business Loan Demand¹²
(From July 1, 2012 to June 30, 2013)

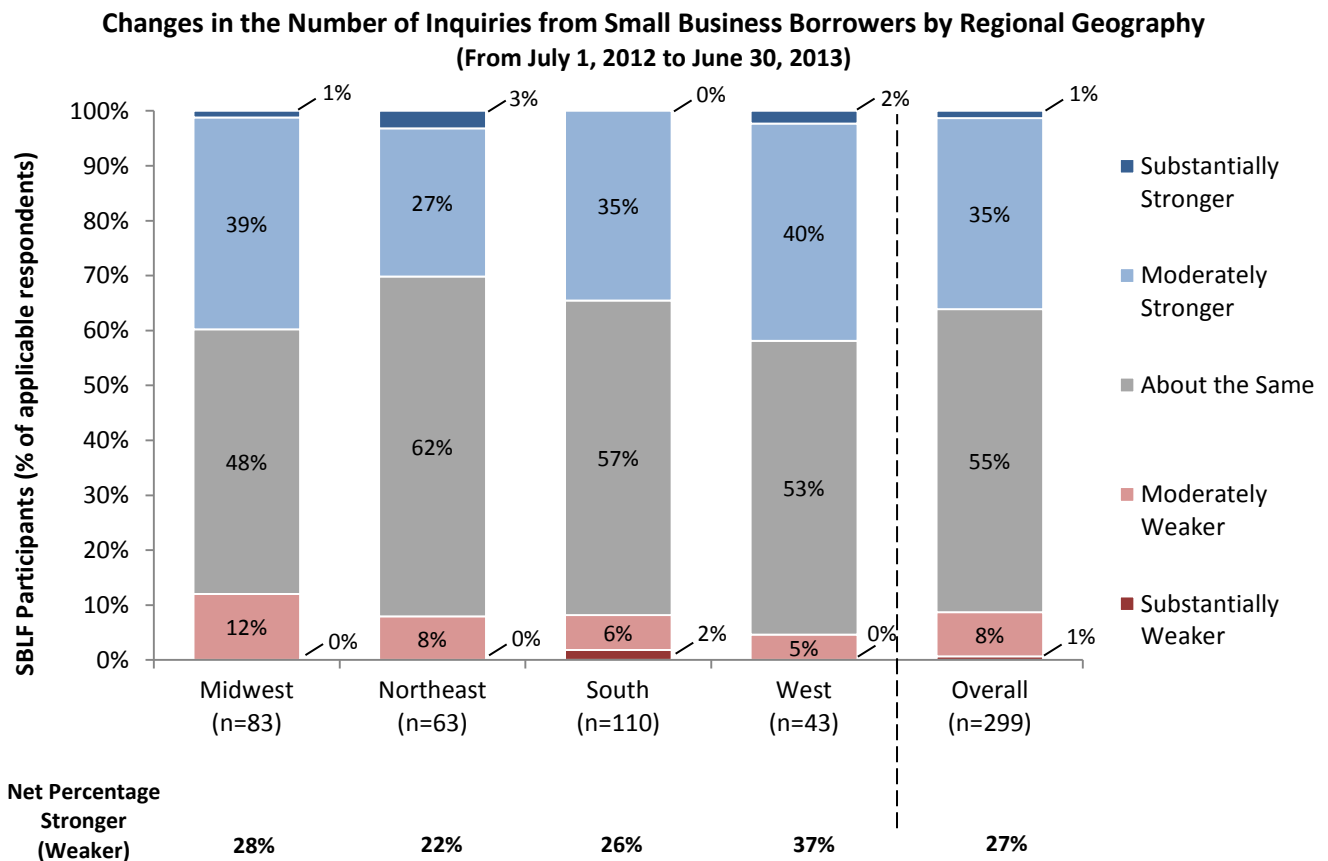


¹² The percentages sum vertically to greater than 100 percent because participants could choose multiple answers. The percentages sum horizontally to less than 100 percent because no single answer was selected by all participants.



Changes in the Number of Inquiries from Potential Small Business Borrowers

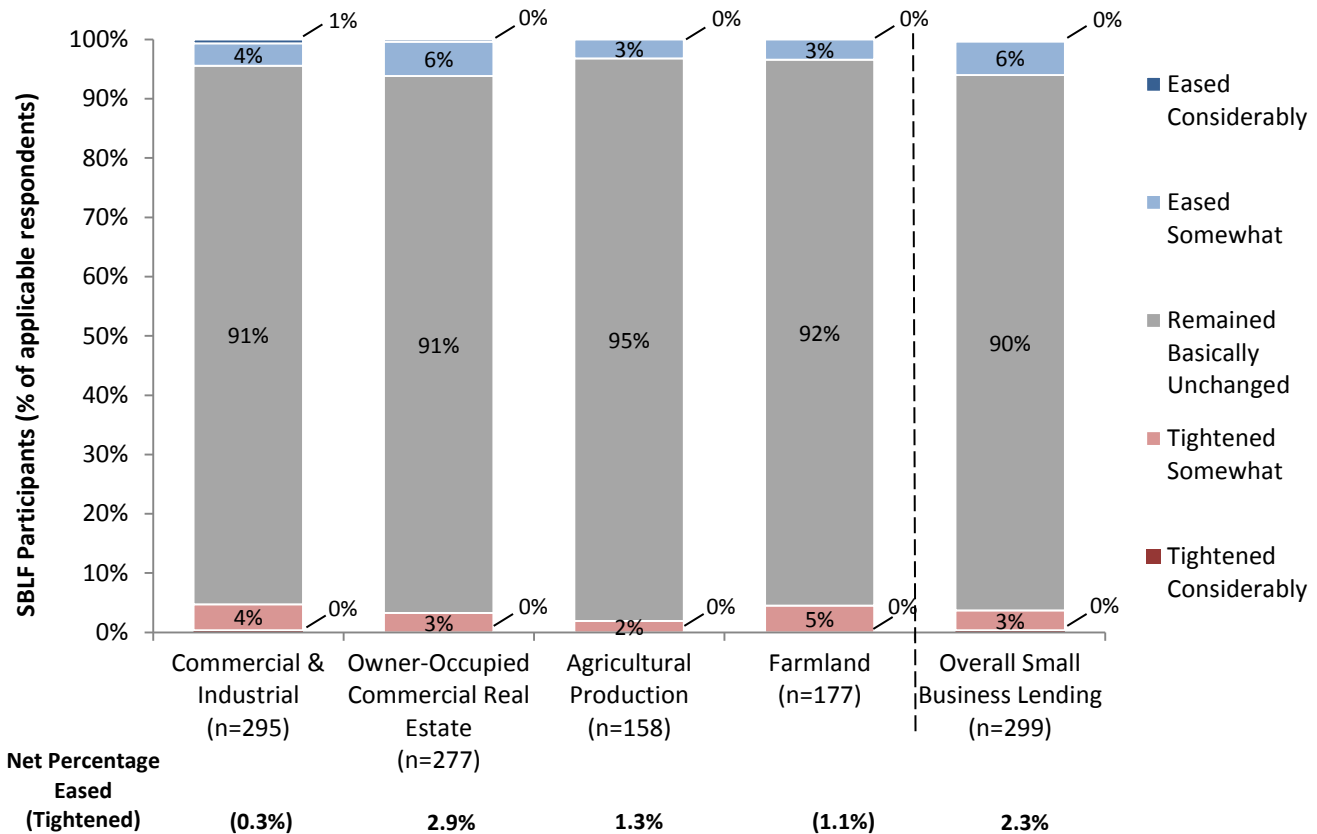
For the year ended June 30, 2013, participants reported a net increase in the number of inquiries from small business borrowers regarding the availability and terms of new lending, with 36 percent reporting an increase in inquiries and nine percent reporting a decrease (net 27 percent reporting an increase in inquiries). These results were similar across geographic regions, with the largest net percentage of participants in the West reporting increases in inquiries (net 37 percent), followed by the Midwest (net 28 percent), the South (net 26 percent), and the Northeast (net 22 percent). The following graph shows the percentage of participants reporting changes in the number of inquiries they received from small business borrowers by regional geography.



CREDIT STANDARDS FOR SMALL BUSINESS LENDING

For the year ended June 30, 2013, a significant majority of SBLF participants (90 percent) reported credit standards for approving small business lending remain basically unchanged, with six percent reporting eased standards and three percent reporting tightened standards, or a net three percent reporting eased standards.¹³ The results are similar across the four categories of small business lending, with more than 90 percent of participants reporting unchanged credit standards for each loan type. The following graph shows the percentage of participants that reported changes in credit standards for small business lending by loan type.

Changes in Credit Standards for Small Business Lending by Loan Type¹⁴
(From July 1, 2012 to June 30, 2013)



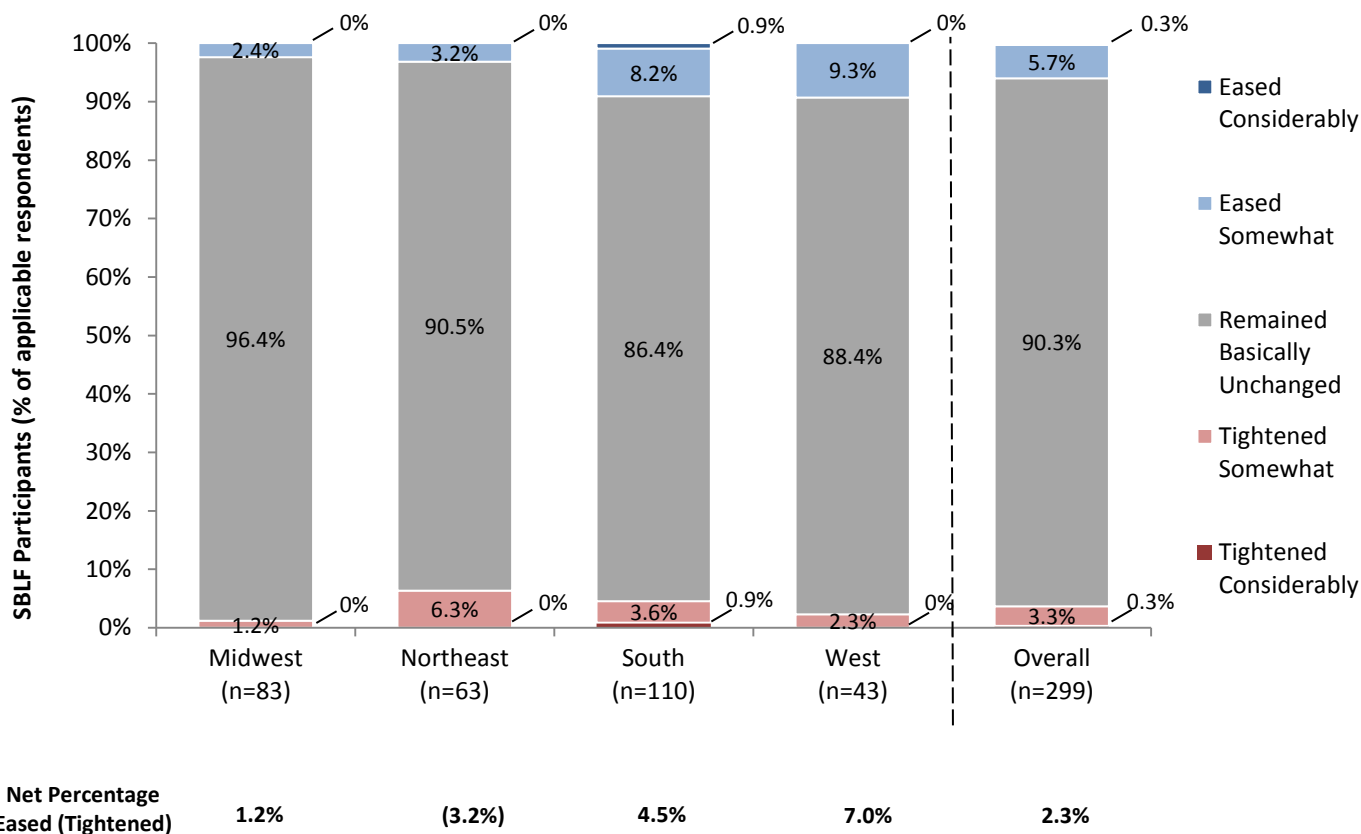
¹³ For questions that ask about credit standards in this report, reported net percentages equal the percentage of participants that reported having eased credit standards or terms (“eased considerably” or “eased somewhat”) minus the percentage of participants that reported having tightened credit standards or terms (“tightened considerably” or “tightened somewhat”).

¹⁴ In responding to the survey, participants reported on changes in credit standards for each of the four small business loan types and, separately, for overall small business lending. In some cases, participants reported that credit standards for overall small business lending had “eased somewhat,” but did not attribute the eased standards to one of the four loan types.



By regional geography, significant majorities of participants in each region reported that credit standards remained basically unchanged, with participants in the West reporting a net seven percent eased and participants in the South and Midwest reporting net changes of less than five percent eased; participants in the Northeast reported net changes of less than five percent tightened.

Changes in Credit Standards for Small Business Lending by Regional Geography
(From July 1, 2012 to June 30, 2013)



Reasons for Changes in Credit Standards

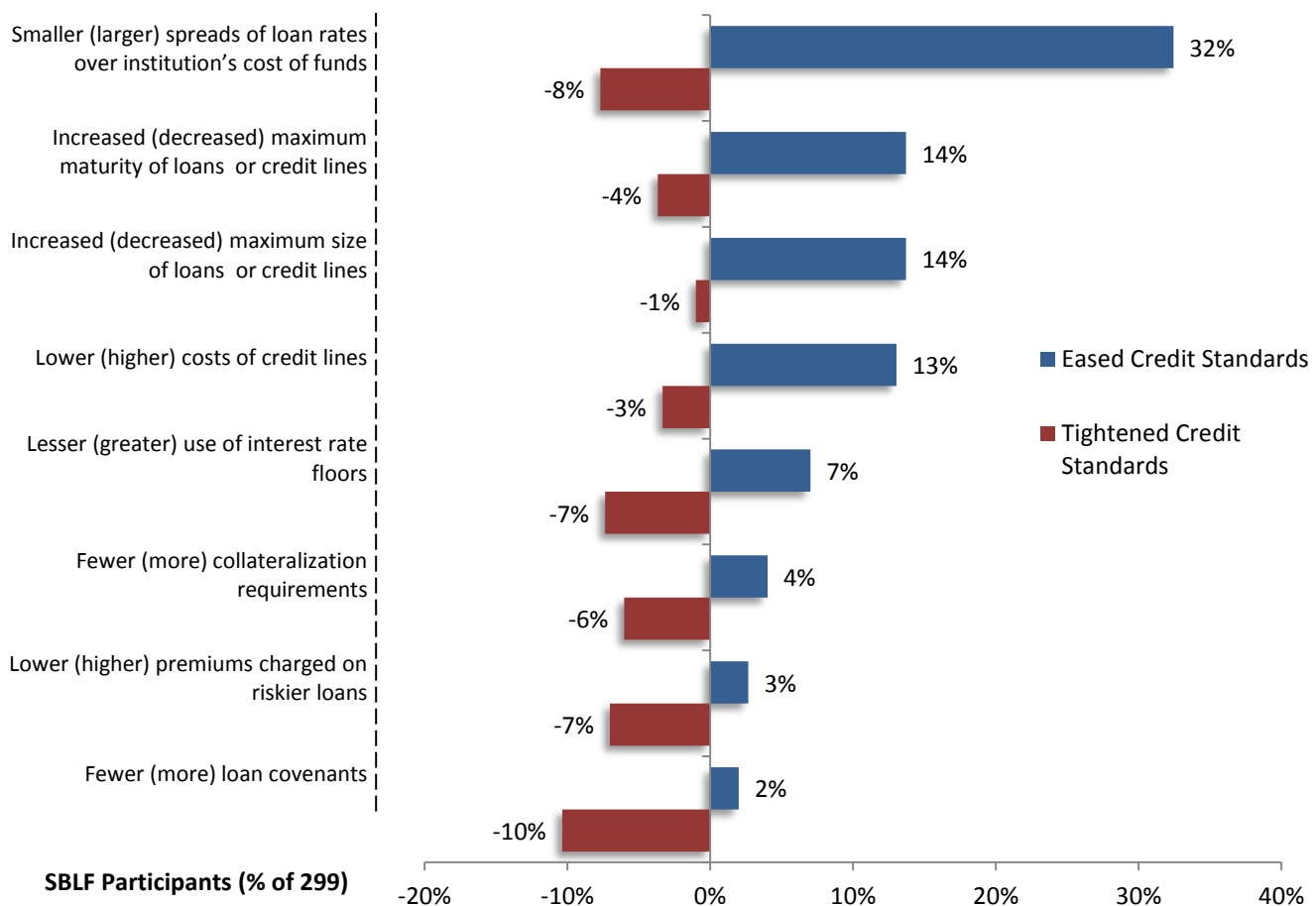
Of the 136 participants (46 percent) that reported eased standards for small business lending, the most commonly cited reasons for the change were (i) more aggressive competition from other financial institutions, (ii) more favorable or less uncertain economic outlook, and (iii) an improvement in the participant’s current or expected capital position. The 70 participants (23 percent) that reported tightened standards for small business lending most commonly cited (i) reduced tolerance for risk, (ii) less favorable or more uncertain economic outlook, and (iii) increased concerns about the effects of legislative changes, supervisory actions, or changes in accounting standards.



Changes in Certain Terms for Small Business Loans

Participants reported that some terms for loans that they are willing to approve have changed over the year, with the largest percentage (32 percent) reporting smaller, or narrower spreads. More often than not, participants also reported eased terms related to loan size and maturity and tightened terms related to more loan covenants, larger spreads, and higher premiums. The following graph shows the percentage of participants that reported eased and tightened standards related to certain terms of small business loans, with positive figures indicating the responses of institutions that reported eased credit standards and negative figures showing the responses of institutions that reported tightened credit standards.

Percentage of Participants Reporting Change in Certain Terms for Small Business Loans¹⁵
 (From July 1, 2012 to June 30, 2013)



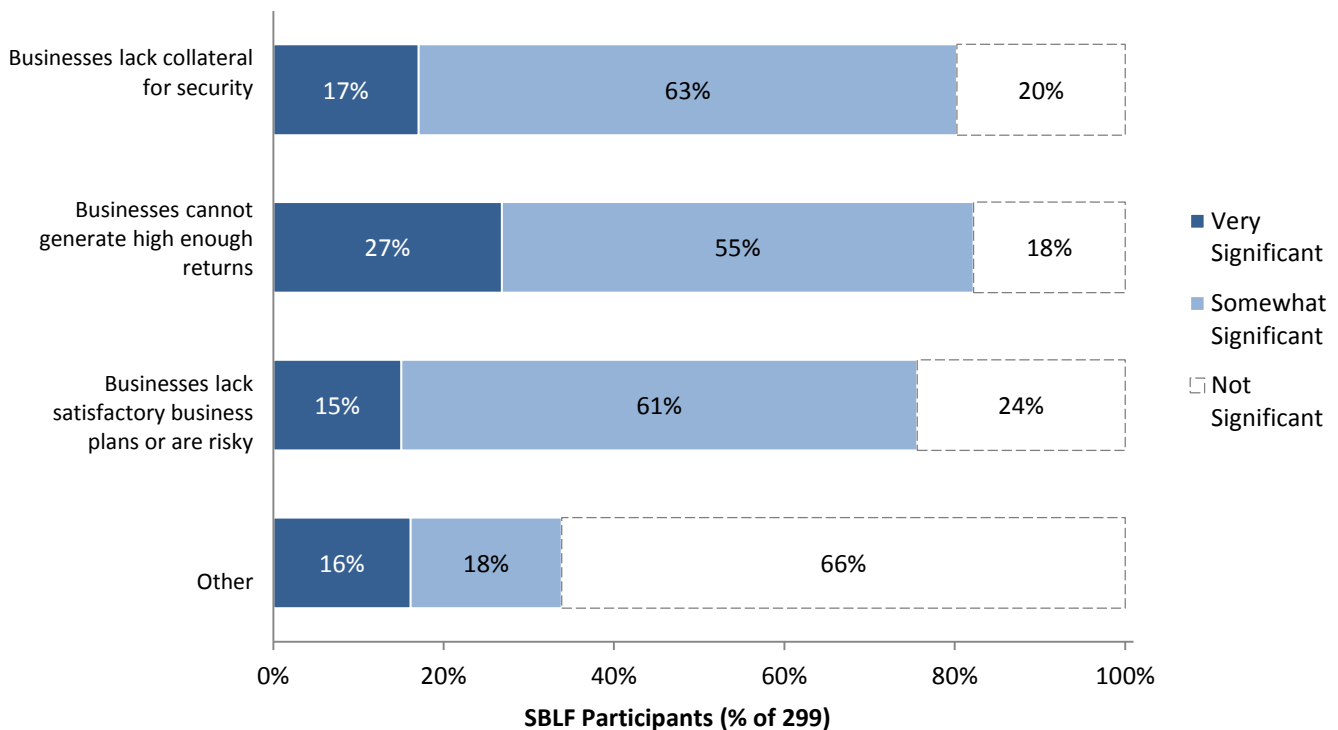
¹⁵ The percentages sum vertically to greater than 100 percent because participants could choose multiple answers. The percentages sum horizontally to less than 100 percent because no single answer was selected by all participants.



OBSTACLES TO SMALL BUSINESS LENDING

For the year ended June 30, 2013, significant majorities of participants reported that returns, collateral, and risks have been obstacles to increasing small business lending. In total, 82 percent of participants reported that businesses’ economic returns are an obstacle to small business lending in that some small businesses cannot generate high enough returns to attract risk investors or have insufficiently high levels of profitability, liquidity, or financial stability, among other factors. Similarly, 80 percent of the participants reported that collateral is an obstacle to small business lending in that some small businesses lack the collateral or assets that would be required as security for loans. In addition, approximately 76 percent reported that some small businesses lack satisfactory business plans or are risky for other reasons. The following graph shows the significance of returns, collateral, and risks as obstacles to increasing small business lending as reported by participants.

Obstacles to Increasing Small Business Lending
(From July 1, 2012 to June 30, 2013)



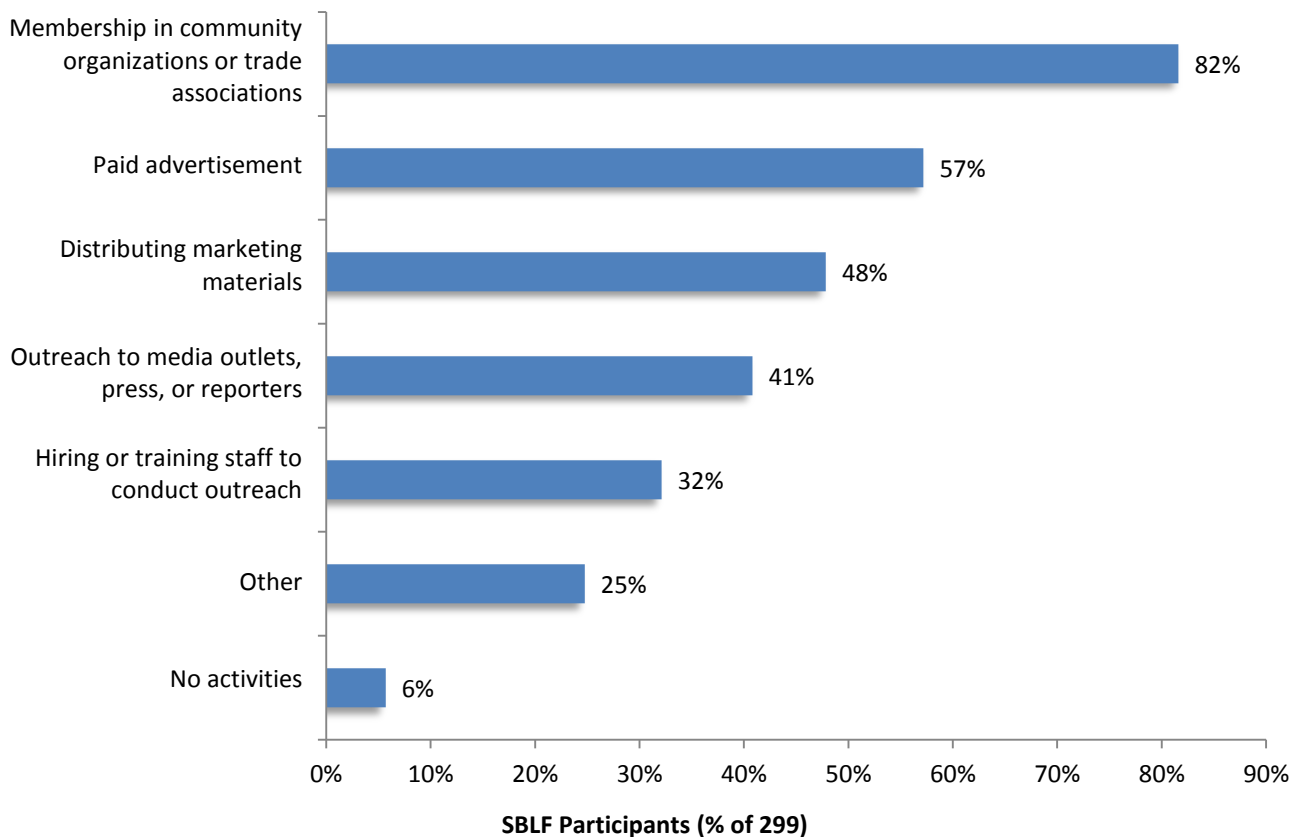
Of the 34 percent of participants that cited “other” obstacles to small business lending, 22 participants gave more detailed responses for “other”. Nearly half noted a lack of demand for new loans or a poor credit history. Other less commonly mentioned obstacles included increased competition from other lending institutions and regulatory uncertainty.



OUTREACH TO SMALL BUSINESSES

For the year ended June 30, 2013, 94 percent of participants reported engaging in outreach or advertising activities targeting women, veteran, or minority communities. In total, 82 percent of SBLF participants reported that they are members of, or participate in, community organizations and/or trade associations that target women, veteran, or minority communities; 57 percent reported using paid advertisement or notices in print, radio, or electronic media to target women, veteran, or minority communities; and, 48 percent indicated that they distributed marketing materials targeting women, veteran, or minority communities. The following graph shows the percentage of participants that reported engaging in certain outreach and advertising activities targeting women, veteran, or minority communities.

Outreach and Advertising Activities Targeting Women, Veteran, or Minority Communities
(From July 1, 2012 to June 30, 2013)

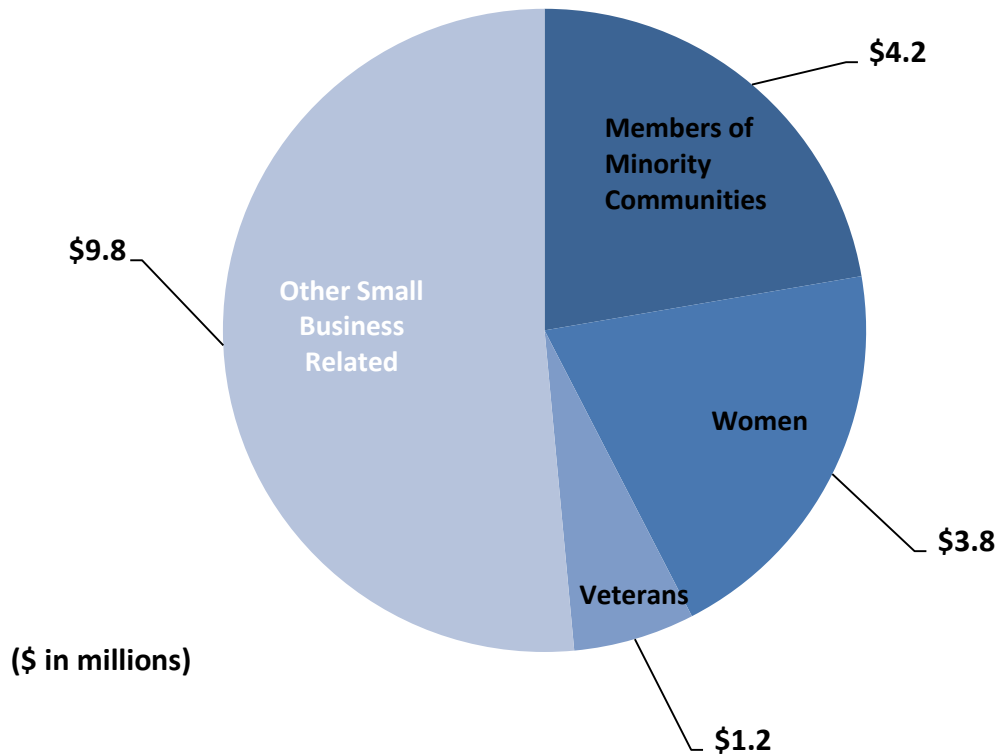


The 74 participants (25 percent) that indicated “other” outreach activities most commonly cited (i) conference and event sponsorships, (ii) hosting of, or participation in, workshops and receptions, and (iii) direct outreach and social media.



In aggregate, participants reported expenditures of \$19.0 million associated with small business-related outreach activities. Ninety-four percent of SBLF participants reported engaging in outreach or advertising activities targeting women, veteran, or minority communities, and of this amount, \$9.2 million (49 percent) was allocated to activities targeting those groups.

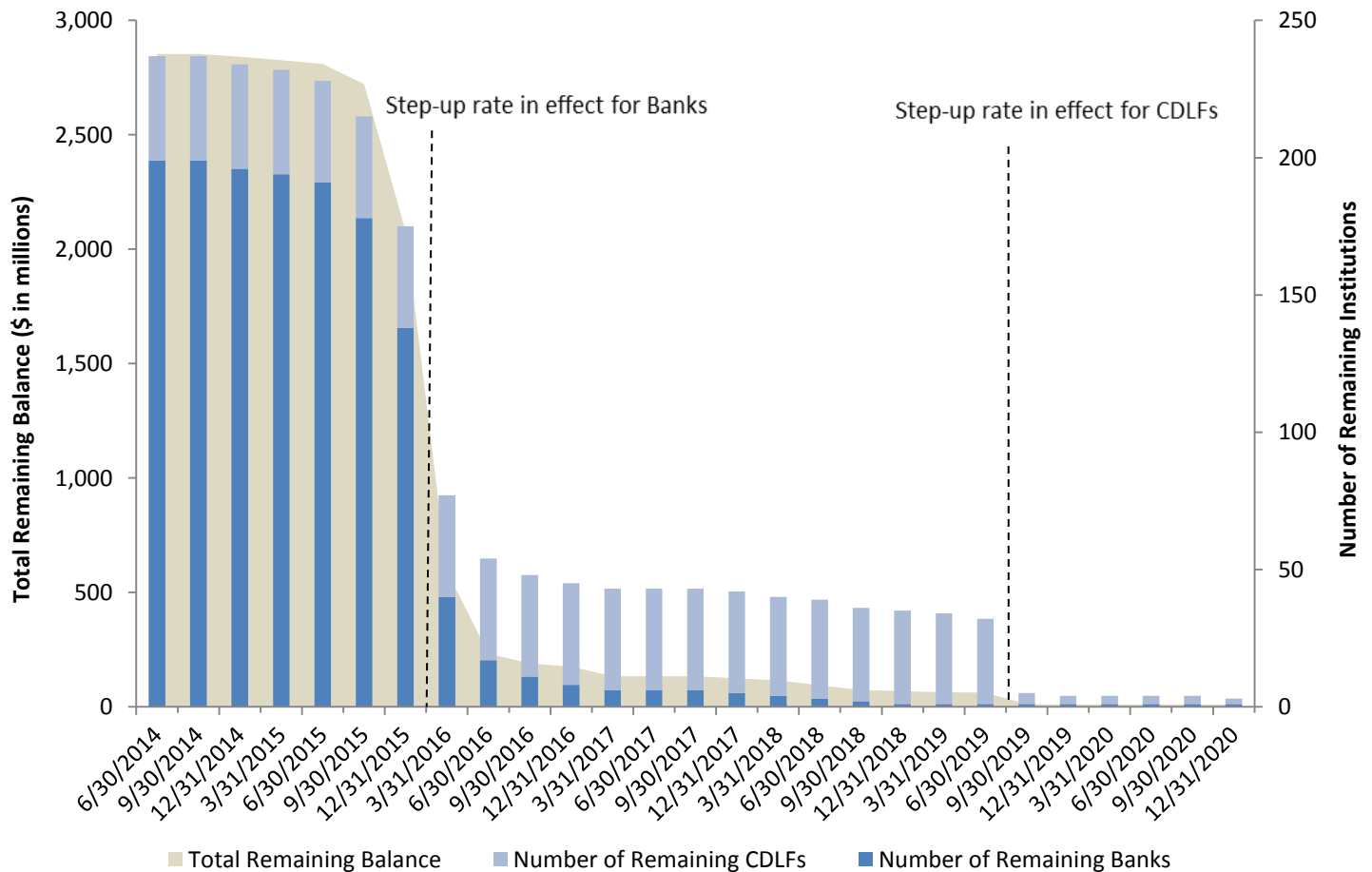
Dollar Value of Outreach Activities Targeting Women, Veteran, or Minority Communities
(From July 1, 2012 to June 30, 2013)



REPAYMENT OF SBLF FUNDING

For the year ended June 30, 2013, SBLF participants reported the estimated calendar quarter and year in which they anticipated fully redeeming Treasury’s investment and exiting the SBLF program.¹⁶ In total, 247 SBLF participants (83 percent) reported that they are planning to redeem Treasury’s investment; 168 out of 208 banks who responded (81 percent) reported that they are planning to redeem in full by the end of Q1 2016. After Q1 2016, 40 of those banks (19 percent) will remain in the program. Thirty-five out of 39 CDLFs who reported (90 percent) plan to redeem in full by the end of Q3 2019; after Q3 2019, only four of those CDLFs (10 percent) will remain in the program. The following graph shows the number of participants and associated lending amounts based on reported estimated SBLF program exit.

SBLF Participants and Lending Dollar Value Remaining in Program Based on Estimated Redemption Quarter
(From July 1, 2012 to June 30, 2013)

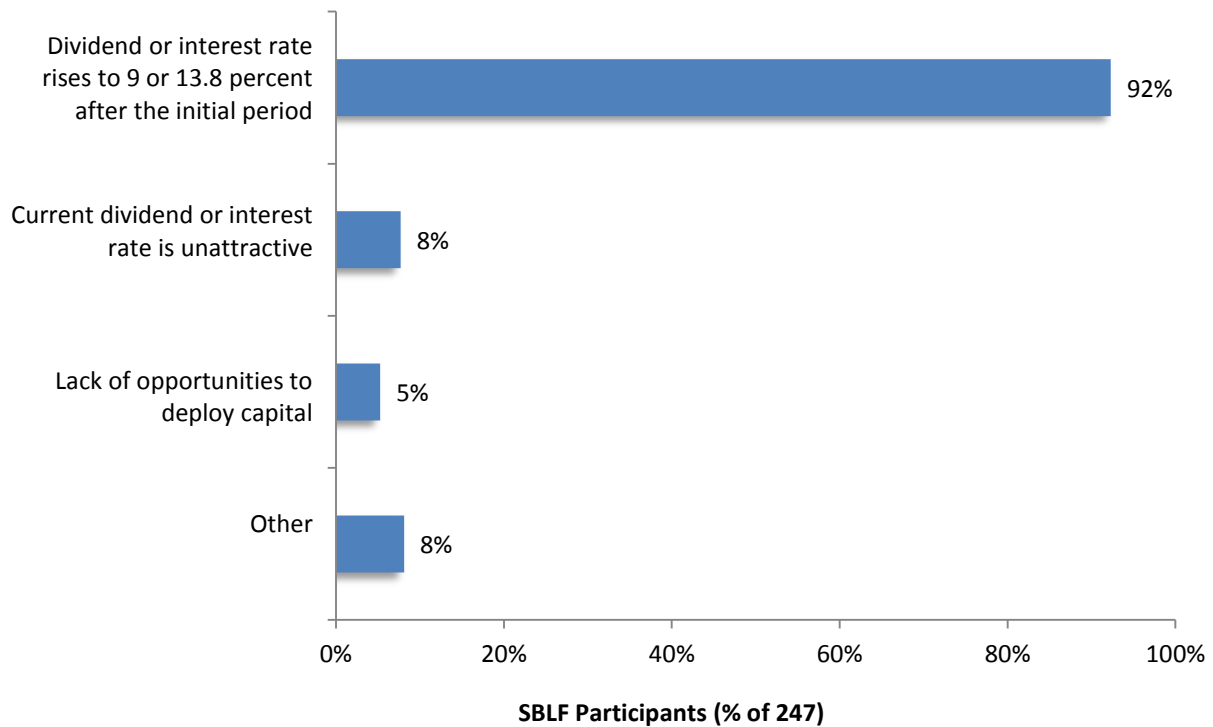


¹⁶ For SBLF bank participants, the step up rate occurs in Q1 2016; for SBLF CDLF participants, the step up rate occurs in Q3 2019.



The 247 participants (83 percent) that anticipate exiting the SBLF Program most commonly cited (i) dividend or interest rate rises to nine percent after the initial period (92 percent), (ii) current dividend or interest rate is unattractive (eight percent), and (iii) other, as the factors that most influence their anticipated timing for exiting the SBLF program.

**Leading Factor(s) for Institutions Exiting the SBLF Program
(From July 1, 2012 to June 30, 2013)**

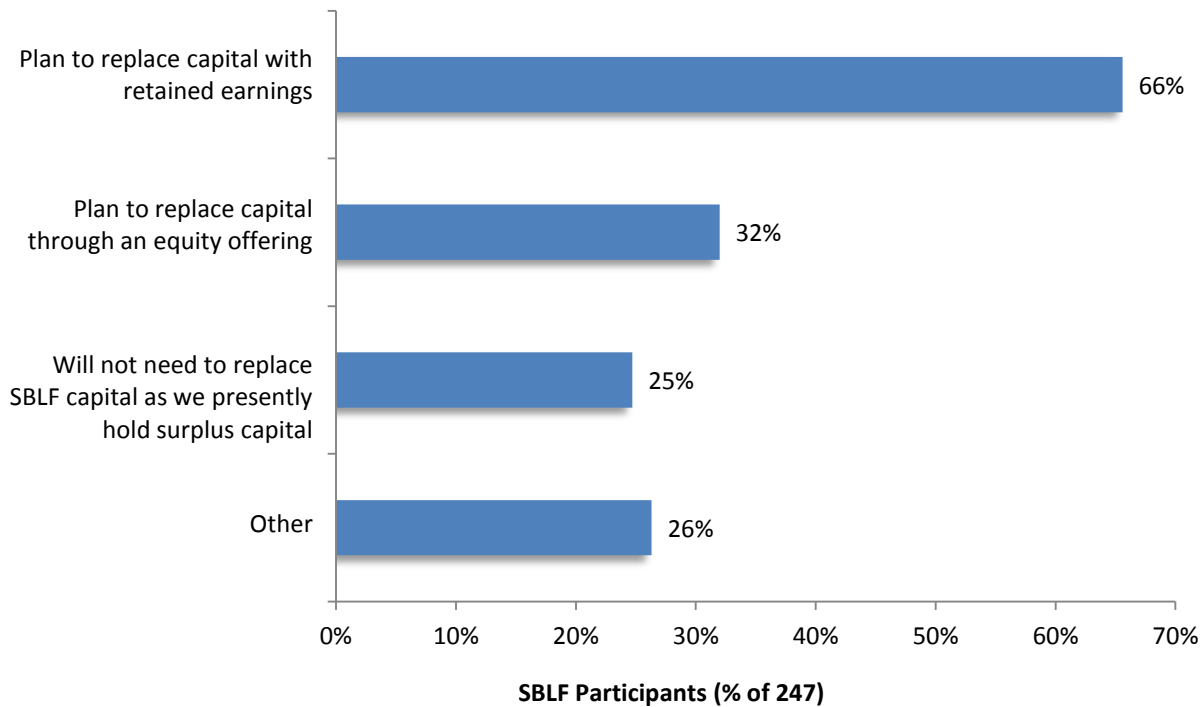


The eight percent of participants that indicated “other” most commonly cited (i) merger with another bank, (ii) surplus capital, and (iii) favorable economic conditions.



The 247 participants (83 percent) that anticipate exiting the SBLF Program most commonly plan to replace the invested SBLF capital with (i) retained earnings (66 percent), or (ii) through an equity offering (32 percent). Twenty-five percent of respondents do not plan on replacing the SBLF capital as they presently hold surplus capital.

How Program Participants Plan to Replace SBLF Capital
(From July 1, 2012 to June 30, 2013)



The 26 percent of participants that indicated “other” most commonly cited (i) combination of debt and equity, (ii) borrowing at the holding company level, and (iii) bank stock.



APPENDIX A: SURVEY METHODOLOGY

The SBLF Lending Survey is an annual information collection required of all institutions participating in the SBLF program. The survey document was distributed to participants in January 2014 and covers lending from July 1, 2012 to June 30, 2013. Treasury asked that participants complete the survey by February 10, 2014. Responses were received from 299 participating institutions, including 249 community banks and 50 CDLFs. Institutions submitting incomplete responses received e-mails and phone calls from Treasury as reminders to complete the survey.

Measurement of Small Business Lending

The Act defines “small business lending” as business loans that are (i) \$10 million or less in amount to businesses with \$50 million or less in revenue and (ii) included in one of the following categories:

- Commercial and industrial loans
- Owner-occupied nonfarm, nonresidential real estate loans (“owner-occupied commercial real estate”)
- Loans to finance agricultural production and other loans to farmers (“agricultural production”)
- Loans secured by farmland (“farmland”)

The SBLF program terms provide for additional adjustments to the calculation of small business lending relating to net charge-offs and portions of loans guaranteed by the U.S. government or for which risk has been assumed by third parties, as well as mergers and acquisitions and purchases of loans.

Changes in small business lending are calculated as the difference between the level of loans outstanding as of December 31, 2013 and the baseline amount. Participants report their baseline and changes in small business lending by submitting quarterly supplemental reports to Treasury. The most recent supplemental report includes lending information as of December 31, 2013.

Survey Design and Review

Treasury developed and designed the survey in 2012. A notice soliciting public comments was published in the Federal Register in April 2012 and one comment was received. The Second Annual Lending Survey was a revised and slightly modified version of the first, the content of which is addressed below.

The practice of conducting any survey may introduce errors, such as difficulties interpreting a particular question, which can introduce idiosyncratic variability into the survey results. Treasury sought to reduce such variability by reviewing the survey with four participants in advance of publication. The purpose of this review was to confirm that each question was clearly stated and that institutions could answer questions using generally available business information. Staff within Treasury also reviewed a draft of the survey prior to its publication. In response to comments received through these reviews, Treasury made certain revisions to the content and format of the survey as appropriate. In addition, Treasury received inquiries from participants requesting clarification of certain portions of Question 7. In response, Treasury sent an email with additional guidance on this question to all survey participants.

The survey included 17 questions on topics including small business lending policies and practices, the use of SBLF funding, outreach to small businesses, and repayment of SBLF Funding. The following includes additional information on the survey questions.

- Questions 1-5. The language used in these questions is based on similar questions in the Federal Reserve’s July 2013 Senior Loan Officer Opinion Survey (SLOOS), which is administered quarterly. Questions 1-3 request information from participants on changes in their credit standards for loans and credit lines that qualify as small business lending relative to longer-term norms. Questions 4-5 request information regarding changes in demand for loans and credit lines that qualify as small business lending relative to longer-term norms.
- Question 6. This question requests information from participants regarding possible obstacles to increasing small business lending over the year.
- Question 7. This question contains several parts and requests information from participants regarding the number, dollar value, length of term, and interest rates of loans or credit lines that the participant made over the year. The information is collected across each of the four categories of small business lending.
- Question 8. This question requests information from participants regarding the percentage of the total dollar value of new loan commitments or increases in outstanding loan commitments that qualify as small business lending that the participant has extended to small business borrowers in each of eight industries, as defined by the North American Industry Classification System (NAICS).
- Question 9. This question requests information from participants regarding the percentage of the total dollar value of approved and funded loans that qualify as small business lending that were secured by collateral and those that were not. The question also requests information from participants on the category type of collateral used to secure those loans.
- Question 10. This question requests information from participants regarding their use of SBLF funding. The survey notes that the cash associated with the SBLF funding may not be readily distinguishable from other cash sources and that participants may need to estimate how the SBLF funding was deployed or how many SBLF dollars were allocated to each use.
- Question 11. This question requests information from participants regarding their increase or decrease in small business lending at the time it received the SBLF investment versus expectations; the survey solicited this information across four industry categories and for overall small business lending.
- Questions 12-13. These questions request information on outreach activities that participants engaged in over the year with respect to activities targeting women, veterans, and members of minority communities, as well as small business lending outreach more broadly.
- Questions 14-17. These questions request information from participants regarding any of their previous partial redemptions, their anticipated full redemption SBLF program exit quarter and year, the factors that most influence their anticipated exit timing, and the participants’ plans to replace the SBLF capital. Banks were given the option of not providing (“N/A”) a response in this year’s survey if they did not wish to provide Treasury with an anticipated redemption date.



Review of Individual Survey Responses

Treasury validated certain elements of each survey response to assess completeness and reasonableness. This review included assessing whether the participant had answered each question on the survey and whether the information provided by the participant was internally consistent in certain respects.

The validation process was conditional in certain instances based on the participant's response to a preceding question. For example, if a participant reported that its credit standards had "eased considerably," Treasury confirmed that the participant also answered the related question about the reason for the eased standards. Similarly, if a participant selected "other" as an obstacle to small business lending, Treasury confirmed that the participant described one or more obstacles in a written response.

Treasury also completed a series of arithmetic validations for certain survey responses. For example, if a participant reported that it had made \$50 million in small business loans over the year, Treasury confirmed that the sum of the total dollar value of small business loans made in each of the four categories of small business lending was also \$50 million. Similarly, if a participant reported that it considered 100 small business loan applications, Treasury confirmed that the reported total number of small business loans made was 100 or less.

In addition, Treasury compared the volume of lending reported on each survey with the lending balances reported by the participant on its quarterly supplemental reports. In some cases, it was clear that participants had not reported dollar values in thousands; as appropriate, these dollar values were divided by 1,000 prior to aggregation.

Review of Aggregate Survey Results

Following the receipt of completed surveys from program participants, Treasury aggregated the responses and reviewed certain aggregate results for reasonableness. For example, Treasury compared the aggregate results of Questions 1-5 to the results from similar questions related to credit standards and loan demand for commercial and industrial loans in the Federal Reserve's July 2013 SLOOS. Treasury found that the results of this survey were broadly consistent with the SLOOS survey results. For example, a significant majority of SLOOS participants reported that credit standards remain basically unchanged and a net percentage reported stronger loan demand.

The aggregate results of Question 6 were compared to similar information on obstacles to small business lending reported in the Federal Reserve Bank of New York's Small Business Borrowers Poll (SBBP).

Treasury similarly assessed the reasonableness of aggregate results for Questions 7 and 8. In reviewing the aggregate responses to Question 7, Treasury performed a roll-forward analysis of reported small business loan stocks to assess the reasonableness of the reported new and renewal lending commitments over the year ended June 30, 2013. As of June 30, 2013, participants reported approximately \$41.9 billion in small business lending, representing a \$200 million decrease over the \$42.1 billion reported as of June 30, 2012. Treasury found that the aggregate lending activity reported by participants over the year ended June 30, 2013 was broadly consistent with the results indicated by the roll-forward analysis.

The results of Question 8 were compared to information on small business lending by business category reported in the U.S. Census Bureau's Survey of Business Owners (SBO). In both cases, the results were broadly consistent.

The results of Question 9 were compared to collateral information from the Federal Reserve Bank of Cleveland and the results were broadly consistent.

In reviewing the aggregate responses to Questions 10-13, we compared the responses to the 2012 Lending Survey responses and were very satisfied with the assumption of reasonableness for the consistency of the responses.

Questions 14-17 were new to the Lending Survey and will be used as a benchmark for comparison to subsequent surveys.

Rounding

Throughout this report, due to rounding, percentages of a whole may not sum to exactly 100 percent. Also due to rounding, the results presented in the written report may differ slightly from the results shown in “Appendix B.”



APPENDIX B: SURVEY RESULTS

The information in this appendix is a summary of the results from the SBLF Lending Survey.

Question 1) Over the year ended June 30, 2013, how have your institution’s credit standards for approving applications for loans (or credit lines) that qualify as small business lending—other than those used to finance mergers and acquisitions—changed?

| | Not applicable | | Tightened considerably | | Tightened somewhat | | Remained basically unchanged | | Eased somewhat | | Eased considerably | |
|--|----------------|----|------------------------|----|--------------------|-----|------------------------------|------|----------------|-----|--------------------|----|
| | # | % | # | % | # | % | # | % | # | % | # | % |
| Commercial and industrial loans (n=295) | 4 | 0% | 1 | 0% | 13 | 4% | 268 | 91% | 11 | 4% | 2 | 1% |
| Midwest | 2 | 0% | 0 | 0% | 2 | 2% | 76 | 94% | 3 | 4% | 0 | 0% |
| Northeast | 1 | 0% | 0 | 0% | 4 | 6% | 56 | 90% | 2 | 3% | 0 | 0% |
| South | 0 | 0% | 1 | 1% | 4 | 4% | 99 | 90% | 4 | 4% | 2 | 2% |
| West | 1 | 0% | 0 | 0% | 3 | 7% | 37 | 88% | 2 | 5% | 0 | 0% |
| Owner-occupied nonfarm, nonresidential real estate (n=277) | 22 | 0% | 0 | 0% | 9 | 3% | 251 | 91% | 16 | 6% | 1 | 0% |
| Midwest | 5 | 0% | 0 | 0% | 1 | 1% | 75 | 96% | 2 | 3% | 0 | 0% |
| Northeast | 6 | 0% | 0 | 0% | 3 | 5% | 53 | 93% | 1 | 2% | 0 | 0% |
| South | 6 | 0% | 0 | 0% | 4 | 4% | 89 | 86% | 10 | 10% | 1 | 1% |
| West | 5 | 0% | 0 | 0% | 1 | 3% | 34 | 89% | 3 | 8% | 0 | 0% |
| Loans to finance agricultural production and other loans to farmers (n=158) | 141 | 0% | 0 | 0% | 3 | 2% | 150 | 95% | 5 | 3% | 0 | 0% |
| Midwest | 29 | 0% | 0 | 0% | 1 | 2% | 53 | 98% | 0 | 0% | 0 | 0% |
| Northeast | 42 | 0% | 0 | 0% | 1 | 5% | 19 | 90% | 1 | 5% | 0 | 0% |
| South | 47 | 0% | 0 | 0% | 1 | 2% | 58 | 92% | 4 | 6% | 0 | 0% |
| West | 23 | 0% | 0 | 0% | 0 | 0% | 20 | 100% | 0 | 0% | 0 | 0% |
| Loans secured by farmland (n=177) | 122 | 0% | 0 | 0% | 8 | 5% | 163 | 92% | 6 | 3% | 0 | 0% |
| Midwest | 20 | 0% | 0 | 0% | 7 | 11% | 56 | 89% | 0 | 0% | 0 | 0% |
| Northeast | 42 | 0% | 0 | 0% | 1 | 5% | 20 | 95% | 0 | 0% | 0 | 0% |
| South | 39 | 0% | 0 | 0% | 0 | 0% | 65 | 92% | 6 | 8% | 0 | 0% |
| West | 21 | 0% | 0 | 0% | 0 | 0% | 22 | 100% | 0 | 0% | 0 | 0% |
| Overall small business lending (n=299) | 0 | 0% | 1 | 0% | 10 | 3% | 270 | 90% | 17 | 6% | 1 | 0% |
| Midwest | 0 | 0% | 0 | 0% | 1 | 1% | 80 | 96% | 2 | 2% | 0 | 0% |
| Northeast | 0 | 0% | 0 | 0% | 4 | 6% | 57 | 90% | 2 | 3% | 0 | 0% |
| South | 0 | 0% | 1 | 1% | 4 | 4% | 95 | 86% | 9 | 8% | 1 | 1% |
| West | 0 | 0% | 0 | 0% | 1 | 2% | 38 | 88% | 4 | 9% | 0 | 0% |



Question 2) For applications for loans (or credit lines) that qualify as small business lending—other than those used to finance mergers and acquisitions—that your institution currently is willing to approve, how have the terms of those loans changed over the year ended June 30, 2013?

| | Tightened considerably | | Tightened somewhat | | Remained basically unchanged | | Eased somewhat | | Eased considerably | |
|--|------------------------|----|--------------------|-----|------------------------------|-----|----------------|-----|--------------------|----|
| | # | % | # | % | # | % | # | % | # | % |
| Maximum size of loans (or credit lines) | 0 | 0% | 3 | 1% | 255 | 85% | 36 | 12% | 5 | 2% |
| Maximum maturity of loans (or credit lines) | 0 | 0% | 11 | 4% | 247 | 83% | 41 | 14% | 0 | 0% |
| Costs of loans (or credit lines) | 0 | 0% | 10 | 3% | 250 | 84% | 38 | 13% | 1 | 0% |
| Spreads of rates over your institution's cost of funds (wider spreads=tightened, narrower spreads=eased) | 0 | 0% | 23 | 8% | 179 | 60% | 93 | 31% | 4 | 1% |
| Premiums charged on riskier loans (or credit lines) | 0 | 0% | 21 | 7% | 270 | 90% | 8 | 3% | 0 | 0% |
| Covenants | 0 | 0% | 31 | 10% | 262 | 88% | 5 | 2% | 1 | 0% |
| Collateralization requirements | 0 | 0% | 18 | 6% | 269 | 90% | 12 | 4% | 0 | 0% |
| Use of interest rate floors (more use=tightened, less use=eased) | 6 | 2% | 16 | 5% | 256 | 86% | 18 | 6% | 3 | 1% |



Question 3) If your institution has tightened or eased its credit standards or terms for approving and funding loans (or credit lines) that qualify as small business lending over the year ended June 30, 2013, how important have been the following possible reasons for the change?

A) If your institution's answer to any part of question (1) or question (2) is "tightened considerably" or "tightened somewhat," how important have been the following possible reasons for the change?

| | Not important | | Somewhat important | | Very important | |
|--|---------------|-----|--------------------|-----|----------------|-----|
| | # | % | # | % | # | % |
| Deterioration in your institution's current or expected capital position | 75 | 86% | 10 | 11% | 2 | 2% |
| Less favorable or more uncertain economic outlook | 41 | 47% | 40 | 46% | 6 | 7% |
| Worsening of industry-specific problems (please specify industries in space below) | 65 | 75% | 16 | 18% | 6 | 7% |
| Less aggressive competition from other financial institutions | 75 | 86% | 12 | 14% | 0 | 0% |
| Reduced tolerance for risk | 39 | 45% | 37 | 43% | 11 | 13% |
| Decreased liquidity in the secondary market for these loans (or credit lines) | 81 | 93% | 5 | 6% | 1 | 1% |
| Deterioration in your institution's current or expected liquidity position | 75 | 86% | 11 | 13% | 1 | 1% |
| Increased concerns about the effects of legislative changes, supervisory actions, or changes in accounting | 44 | 51% | 34 | 39% | 9 | 10% |

B) If your institution's answer to any part of question (1) or question (2) is "eased considerably" or "eased somewhat," how important have been the following possible reasons for the change?

| | Not important | | Somewhat important | | Very important | |
|--|---------------|-----|--------------------|-----|----------------|-----|
| | # | % | # | % | # | % |
| Improvement in your institution's current or expected capital position | 84 | 60% | 44 | 31% | 13 | 9% |
| More favorable or less uncertain economic outlook | 63 | 45% | 72 | 51% | 6 | 4% |
| Improvement in industry-specific problems (please specify industries in space below) | 126 | 90% | 11 | 8% | 3 | 2% |
| More aggressive competition from other financial institutions | 25 | 18% | 77 | 55% | 39 | 28% |
| Increased tolerance for risk | 111 | 79% | 25 | 18% | 5 | 4% |
| Increased liquidity in the secondary market for these loans (or credit lines) | 129 | 91% | 11 | 8% | 1 | 1% |
| Improvement in your institution's current or expected liquidity position | 95 | 67% | 41 | 29% | 5 | 4% |
| Reduced concerns about the effects of legislative changes, supervisory actions, or changes in accounting | 129 | 91% | 8 | 6% | 4 | 3% |



Question 4) How has demand for loans (or credit lines) that qualify as small business lending changed over the year ended June 30, 2013? (Please consider inquiries and applications for new, renewal, increases in outstanding, or extensions of outstanding loans or credit lines.)

| | Not applicable | Substantially stronger | | Moderately stronger | | About the same | | Moderately weaker | | Substantially weaker | |
|--|----------------|------------------------|----|---------------------|-----|----------------|-----|-------------------|-----|----------------------|----|
| | # | # | % | # | % | # | % | # | % | # | % |
| Commercial and industrial loans (n=295) | 4 | 3 | 1% | 102 | 35% | 156 | 53% | 31 | 11% | 3 | 1% |
| Midwest | 2 | 0 | 0% | 30 | 37% | 40 | 49% | 11 | 14% | 0 | 0% |
| Northeast | 1 | 1 | 2% | 15 | 24% | 38 | 61% | 8 | 13% | 0 | 0% |
| South | 0 | 0 | 0% | 40 | 36% | 59 | 54% | 9 | 8% | 2 | 2% |
| West | 1 | 2 | 5% | 17 | 40% | 19 | 45% | 3 | 7% | 1 | 2% |
| Owner-occupied nonfarm, nonresidential real estate (n=277) | 22 | 5 | 2% | 95 | 34% | 156 | 56% | 19 | 7% | 2 | 1% |
| Midwest | 5 | 1 | 1% | 28 | 36% | 42 | 54% | 7 | 9% | 0 | 0% |
| Northeast | 6 | 2 | 4% | 17 | 30% | 35 | 61% | 3 | 5% | 0 | 0% |
| South | 6 | 1 | 1% | 34 | 33% | 59 | 57% | 8 | 8% | 2 | 2% |
| West | 5 | 1 | 3% | 16 | 42% | 20 | 53% | 1 | 3% | 0 | 0% |
| Loans to finance agricultural production and other loans to farmers (n=156) | 143 | 2 | 1% | 27 | 17% | 112 | 72% | 13 | 8% | 2 | 1% |
| Midwest | 29 | 2 | 4% | 14 | 26% | 33 | 61% | 5 | 9% | 0 | 0% |
| Northeast | 44 | 0 | 0% | 4 | 21% | 14 | 74% | 1 | 5% | 0 | 0% |
| South | 47 | 0 | 0% | 7 | 11% | 50 | 79% | 4 | 6% | 2 | 3% |
| West | 23 | 0 | 0% | 2 | 10% | 15 | 75% | 3 | 15% | 0 | 0% |
| Loans secured by farmland (n=175) | 124 | 2 | 1% | 35 | 20% | 124 | 71% | 13 | 7% | 1 | 1% |
| Midwest | 20 | 2 | 3% | 16 | 25% | 40 | 63% | 5 | 8% | 0 | 0% |
| Northeast | 44 | 0 | 0% | 3 | 16% | 15 | 79% | 1 | 5% | 0 | 0% |
| South | 39 | 0 | 0% | 13 | 18% | 52 | 73% | 5 | 7% | 1 | 1% |
| West | 21 | 0 | 0% | 3 | 14% | 17 | 77% | 2 | 9% | 0 | 0% |
| Overall small business lending (n=299) | 0 | 4 | 1% | 104 | 35% | 165 | 55% | 24 | 8% | 2 | 1% |
| Midwest | 0 | 1 | 1% | 32 | 39% | 40 | 48% | 10 | 12% | 0 | 0% |
| Northeast | 0 | 2 | 3% | 17 | 27% | 39 | 62% | 5 | 8% | 0 | 0% |
| South | 0 | 0 | 0% | 38 | 35% | 63 | 57% | 7 | 6% | 2 | 2% |
| West | 0 | 1 | 2% | 17 | 40% | 23 | 53% | 2 | 5% | 0 | 0% |



Question 5) If demand for loans (or credit lines) that qualify as small business lending has strengthened or weakened over the year ended June 30, 2013, how important have been the following possible reasons for the change?

A) If your institution's answer to any part of question (4) is "substantially stronger" or "moderately stronger," how important have been the following possible reasons for the change?

| | Not important | | Somewhat important | | Very important | |
|--|---------------|-----|--------------------|-----|----------------|-----|
| | # | % | # | % | # | % |
| Customer inventory financing needs increased | 79 | 52% | 68 | 45% | 5 | 3% |
| Customer accounts receivable financing needs increased | 68 | 45% | 75 | 49% | 9 | 6% |
| Customer investment in plant or equipment increased | 31 | 20% | 108 | 71% | 13 | 9% |
| Customer internally generated funds decreased | 118 | 78% | 27 | 18% | 7 | 5% |
| Customer merger or acquisition financing needs increased | 127 | 84% | 22 | 14% | 3 | 2% |
| Customer borrowing shifted to your institution from other bank or nonbank sources because these other sources became less attractive | 44 | 29% | 88 | 58% | 20 | 13% |
| Other | 30 | 71% | 5 | 12% | 7 | 17% |

B) If your institution's answer to any part of question (4) is "substantially weaker" or "moderately weaker," how important have been the following possible reasons for the change?

| | Not important | | Somewhat important | | Very important | |
|---|---------------|-----|--------------------|-----|----------------|-----|
| | # | % | # | % | # | % |
| Customer inventory financing needs decreased | 39 | 68% | 17 | 30% | 1 | 2% |
| Customer accounts receivable financing needs decreased | 42 | 74% | 14 | 25% | 1 | 2% |
| Customer investment in plant or equipment decreased | 32 | 56% | 19 | 33% | 6 | 11% |
| Customer internally generated funds increased | 35 | 61% | 18 | 32% | 4 | 7% |
| Customer merger or acquisition financing needs decreased | 55 | 96% | 1 | 2% | 1 | 2% |
| Customer borrowing shifted from your institution to other bank or nonbank credit sources because these other sources became more attractive | 32 | 56% | 20 | 35% | 5 | 9% |
| Other | 16 | 57% | 1 | 4% | 11 | 39% |



Question 6) For applications for loans (or credit lines) that qualify as small business lending and that your institution did not approve over the year ended June 30, 2013, how significant were the following possible obstacles?

| | Not significant | | Somewhat significant | | Very significant | |
|---|-----------------|-----|----------------------|-----|------------------|-----|
| | # | % | # | % | # | % |
| Collateral – applicants lacked the assets required for use as security | 59 | 20% | 189 | 63% | 51 | 17% |
| Returns – applicants did not generate high enough returns to attract risk investors or had insufficiently high levels of profitability, liquidity, or stability | 53 | 18% | 165 | 55% | 80 | 27% |
| Risks – applicants lacked satisfactory business plans or were risky for other reasons | 73 | 24% | 181 | 61% | 45 | 15% |
| Other | 41 | 66% | 11 | 18% | 10 | 16% |



Question 7) This question asks for information on loans (or credit lines) that your institution considered or approved and funded over the year ended June 30, 2013 and that qualify as small business lending. The information requested is from your institution’s lending data on the volume of loans (or credit lines) it considered or approved and funded from July 1, 2012 to June 30, 2013. Like other questions on this survey, the information requested in this question is not reported on your institution’s call reports and cannot be calculated from information reported on those call reports. The definition of small business lending is included on the first page of this survey. Among other things, this definition excludes any government guaranteed portion of loans (or credit lines).

7)A & 7)B

| | Commercial and industrial loans | Owner-occupied nonfarm, nonresidential real estate loans | Loans to finance agricultural production and other loans to farmers | Loans secured by farmland | Total |
|--|---------------------------------|--|---|---------------------------|----------------|
| Total number of loan applications | | | | | |
| New or increases in outstanding credit | 68,859 | 12,922 | 14,264 | 3,590 | 99,635 |
| Renewals or extensions of outstanding credit | 35,322 | 4,815 | 5,806 | 1,815 | 47,758 |
| All commitments | 104,181 | 17,737 | 20,070 | 5,405 | 147,393 |
| Total number of loans made | | | | | |
| New or increases in outstanding credit | 50,570 | 9,155 | 12,141 | 3,283 | 75,149 |
| Renewals or extensions of outstanding credit | 32,916 | 4,382 | 5,541 | 1,771 | 44,610 |
| All commitments | 83,486 | 13,537 | 17,682 | 5,054 | 119,759 |
| Percentage of loans made | | | | | |
| All commitments | 80% | 76% | 88% | 94% | 81% |

| | Midwest | Northeast | South | West | Total |
|--|---------------|---------------|---------------|---------------|----------------|
| Total number of loan applications | | | | | |
| New or increases in outstanding credit | 29,990 | 9,283 | 46,836 | 13,526 | 99,635 |
| Renewals or extensions of outstanding credit | 14,128 | 2,931 | 22,616 | 8,083 | 47,758 |
| All commitments | 44,118 | 12,214 | 69,452 | 21,609 | 147,393 |
| Total number of loans made | | | | | |
| New or increases in outstanding credit | 24,536 | 6,731 | 34,805 | 9,077 | 75,149 |
| Renewals or extensions of outstanding credit | 13,011 | 2,758 | 21,870 | 6,971 | 44,610 |
| All commitments | 37,547 | 9,489 | 56,675 | 16,048 | 119,759 |
| Percentage of loans made | | | | | |
| All commitments | 85% | 78% | 82% | 74% | 81% |



7)C

| | Commercial and industrial loans | Owner-occupied nonfarm, nonresidential real estate loans | Loans to finance agricultural production and other loans to farmers | Loans secured by farmland | Total |
|---|---------------------------------|--|---|---------------------------|-------------------|
| Total dollar value of loans made (in thousands) | | | | | |
| New or increases in outstanding credit | 10,421,144 | 5,140,751 | 1,643,764 | 1,116,994 | 18,322,653 |
| Renewals or extensions of outstanding | 8,237,073 | 2,093,675 | 1,208,388 | 465,068 | 12,004,204 |
| All commitments | 18,658,217 | 7,234,426 | 2,852,151 | 1,582,062 | 30,326,857 |
| Percentage of total dollar value of loans made | | | | | |
| New or increases in outstanding credit | 56% | 71% | 58% | 71% | 60% |
| Renewals or extensions of outstanding | 44% | 29% | 42% | 29% | 40% |
| All commitments | 100% | 100% | 100% | 100% | 100% |
| Average dollar value of loans made | | | | | |
| All commitments | 223,489 | 534,419 | 161,303 | 313,032 | 253,232 |

| | Midwest | Northeast | South | West | Total |
|---|------------------|------------------|-------------------|------------------|-------------------|
| Total dollar value of loans made (in thousands) | | | | | |
| New or increases in outstanding credit | 5,278,337 | 1,767,013 | 8,274,816 | 3,002,487 | 18,322,653 |
| Renewals or extensions of outstanding | 3,028,407 | 869,595 | 4,817,693 | 3,288,509 | 12,004,204 |
| All commitments | 8,306,744 | 2,636,608 | 13,092,509 | 6,290,996 | 30,326,857 |
| Percentage of total dollar value of loans made | | | | | |
| New or increases in outstanding credit | 64% | 67% | 63% | 48% | 60% |
| Renewals or extensions of outstanding | 36% | 33% | 37% | 52% | 40% |
| All commitments | 100% | 100% | 100% | 100% | 100% |
| Average dollar value of loans made | | | | | |
| All commitments | 221,236 | 277,859 | 231,010 | 392,011 | 253,232 |



7)D & 7)E

| | Commercial and industrial loans | | Owner-occupied nonfarm, nonresidential real estate loans | | Loans to finance agricultural production and other loans to farmers | | Loans secured by farmland | | Total | |
|---|---------------------------------|-------------|--|-------------|---|-------------|---------------------------|-------------|-------------------|-------------|
| | # | % | # | % | # | % | # | % | # | % |
| Total number and percent of loans made by size | | | | | | | | | | |
| \$100,000 or less | 57,496 | 69% | 3,567 | 26% | 11,887 | 67% | 2,193 | 43% | 75,143 | 63% |
| More than \$100,000 up to \$250,000 | 11,031 | 13% | 3,329 | 25% | 2,885 | 16% | 1,214 | 24% | 18,459 | 15% |
| More than \$250,000 up to \$1,000,000 | 10,694 | 13% | 4,608 | 34% | 2,402 | 14% | 1,267 | 25% | 18,971 | 16% |
| More than \$1,000,000 up to \$10,000,000 | 4,265 | 5% | 2,031 | 15% | 508 | 3% | 380 | 8% | 7,184 | 6% |
| Total | 83,486 | 100% | 13,535 | 100% | 17,682 | 100% | 5,054 | 100% | 119,757 | 100% |
| Total dollar value (in thousands) and percent of loans made by size | | | | | | | | | | |
| \$100,000 or less | 1,577,475 | 8% | 202,573 | 3% | 385,505 | 14% | 94,246 | 6% | 2,259,799 | 7% |
| More than \$100,000 up to \$250,000 | 1,810,549 | 10% | 591,687 | 8% | 435,443 | 15% | 206,792 | 13% | 3,044,470 | 10% |
| More than \$250,000 up to \$1,000,000 | 5,397,339 | 29% | 2,386,737 | 33% | 1,070,354 | 38% | 586,376 | 37% | 9,440,807 | 31% |
| More than \$1,000,000 up to \$10,000,000 | 9,872,856 | 53% | 4,053,429 | 56% | 960,854 | 34% | 694,648 | 44% | 15,581,787 | 51% |
| Total | 18,658,219 | 100% | 7,234,425 | 100% | 2,852,156 | 100% | 1,582,062 | 100% | 30,326,862 | 100% |
| | Midwest | | Northeast | | South | | West | | Total | |
| Total number and percent of loans made by size | # | % | # | % | # | % | # | % | # | % |
| \$100,000 or less | 22,688 | 60% | 5,430 | 57% | 39,542 | 70% | 7,483 | 47% | 75,143 | 63% |
| More than \$100,000 up to \$250,000 | 6,934 | 18% | 1,806 | 19% | 6,772 | 12% | 2,947 | 18% | 18,459 | 15% |
| More than \$250,000 up to \$1,000,000 | 6,078 | 16% | 1,674 | 18% | 7,387 | 13% | 3,832 | 24% | 18,971 | 16% |
| More than \$1,000,000 up to \$10,000,000 | 1,847 | 5% | 579 | 6% | 2,974 | 5% | 1,784 | 11% | 7,184 | 6% |
| Total | 37,547 | 100% | 9,489 | 100% | 56,675 | 100% | 16,046 | 100% | 119,757 | 100% |
| Total dollar value (in thousands) and percent of loans made by size | | | | | | | | | | |
| \$100,000 or less | 779,748 | 9% | 225,816 | 9% | 962,680 | 7% | 291,555 | 5% | 2,259,799 | 7% |
| More than \$100,000 up to \$250,000 | 1,060,661 | 13% | 323,230 | 12% | 1,154,665 | 9% | 505,914 | 8% | 3,044,470 | 10% |
| More than \$250,000 up to \$1,000,000 | 2,783,301 | 34% | 856,100 | 32% | 3,760,139 | 29% | 2,041,267 | 32% | 9,440,807 | 31% |
| More than \$1,000,000 up to \$10,000,000 | 3,683,036 | 44% | 1,231,467 | 47% | 7,215,027 | 55% | 3,452,258 | 55% | 15,581,787 | 51% |
| Total | 8,306,745 | 100% | 2,636,613 | 100% | 13,092,510 | 100% | 6,290,994 | 100% | 30,326,862 | 100% |



7)F

| | Commercial and industrial loans | Owner-occupied nonfarm, nonresidential real estate loans | Loans to finance agricultural production and other loans to farmers | Loans secured by farmland | Total |
|---|---------------------------------|--|---|---------------------------|-------------------|
| Total dollar value of loans made by length of term (in thousands) | | | | | |
| Less than one year | 4,264,935 | 468,768 | 1,173,607 | 182,955 | 6,090,265 |
| One to two years | 6,682,246 | 683,074 | 1,207,848 | 285,192 | 8,858,360 |
| More than two years, but less than five years | 4,112,279 | 1,492,699 | 273,826 | 388,973 | 6,267,777 |
| More than five years | 3,598,755 | 4,589,887 | 196,872 | 724,942 | 9,110,456 |
| Total | 18,658,215 | 7,234,428 | 2,852,153 | 1,582,062 | 30,326,858 |
| Percentage of total dollar value of loans made by length of term | | | | | |
| Less than one year | 23% | 6% | 41% | 12% | 20% |
| One to two years | 36% | 9% | 42% | 18% | 29% |
| More than two years, but less than five years | 22% | 21% | 10% | 25% | 21% |
| More than five years | 19% | 63% | 7% | 46% | 30% |
| Total | 100% | 100% | 100% | 100% | 100% |

| | Midwest | Northeast | South | West | Total |
|---|------------------|------------------|-------------------|------------------|-------------------|
| Total dollar value of loans made by length of term (in thousands) | | | | | |
| Less than one year | 1,874,989 | 413,351 | 2,165,365 | 1,636,560 | 6,090,265 |
| One to two years | 2,687,283 | 498,157 | 3,944,364 | 1,728,557 | 8,858,360 |
| More than two years, but less than five years | 1,777,073 | 444,254 | 2,991,678 | 1,054,772 | 6,267,777 |
| More than five years | 1,967,393 | 1,280,850 | 3,991,100 | 1,871,113 | 9,110,456 |
| Total | 8,306,738 | 2,636,611 | 13,092,507 | 6,291,002 | 30,326,858 |
| Percentage of total dollar value of loans made by length of term | | | | | |
| Less than one year | 23% | 16% | 17% | 26% | 20% |
| One to two years | 32% | 19% | 30% | 27% | 29% |
| More than two years, but less than five years | 21% | 17% | 23% | 17% | 21% |
| More than five years | 24% | 49% | 30% | 30% | 30% |
| Total | 100% | 100% | 100% | 100% | 100% |



7)G & 7)H

| | Commercial and industrial loans | Owner-occupied nonfarm, nonresidential real estate loans | Loans to finance agricultural production and other loans to farmers | Loans secured by farmland | Total |
|--|---------------------------------|--|---|---------------------------|-------------------|
| Total dollar value of loans made by type of interest rate (in thousands) | | | | | |
| Fixed | 6,184,311 | 4,284,420 | 1,284,904 | 1,046,575 | 12,800,209 |
| Adjustable Rate (at time of origination) | 12,473,907 | 2,950,005 | 1,567,254 | 535,484 | 17,526,650 |
| Total | 18,658,218 | 7,234,424 | 2,852,157 | 1,582,059 | 30,326,858 |
| Percentage of total dollar value of loans made by type of interest rate | | | | | |
| Fixed | 33% | 59% | 45% | 66% | 42% |
| Adjustable Rate (at time of origination) | 67% | 41% | 55% | 34% | 58% |
| Total | 100% | 100% | 100% | 100% | 100% |
| Interest rate of loans made by type (weighted average) | | | | | |
| Fixed | 5.83% | 4.75% | 4.19% | 2.11% | 5.00% |
| Adjustable Rate (at time of origination) | 4.18% | 3.81% | 1.63% | 1.85% | 3.82% |
| Total | 4.73% | 4.37% | 2.79% | 2.02% | 4.32% |

| | Midwest | Northeast | South | West | Total |
|--|------------------|------------------|-------------------|------------------|-------------------|
| Total dollar value of loans made by type of interest rate (in thousands) | | | | | |
| Fixed | 4,607,454 | 1,055,686 | 5,301,178 | 1,835,890 | 12,800,209 |
| Adjustable Rate (at time of origination) | 3,699,294 | 1,580,927 | 7,791,319 | 4,455,110 | 17,526,650 |
| Total | 8,306,748 | 2,636,613 | 13,092,497 | 6,291,000 | 30,326,858 |
| Percentage of total dollar value of loans made by type of interest rate | | | | | |
| Fixed | 55% | 40% | 40% | 29% | 42% |
| Adjustable Rate (at time of origination) | 45% | 60% | 60% | 71% | 58% |
| Total | 100% | 100% | 100% | 100% | 100% |
| Interest rate of loans made by type (weighted average) | | | | | |
| Fixed | 4.28% | 6.21% | 5.26% | 4.88% | 5.00% |
| Adjustable Rate (at time of origination) | 3.69% | 3.64% | 3.99% | 4.22% | 3.82% |
| Total | 4.02% | 4.67% | 4.50% | 4.41% | 4.32% |



Question 8) Over the year ended June 30, 2013, estimate the percentage of the total dollar value of loans (or credit lines) that qualify as small business lending that your institution has approved and funded in each of the following categories of businesses, as defined by the North American Industry Classification System (NAICS). Please include owner-occupied nonfarm, nonresidential real estate loans (or credit lines) that qualify as small business lending in the industry category in which the occupant participates. The sum of the percentages should total 100 percent.

| | Overall | Midwest | Northeast | South | West |
|-----------------|-------------|-------------|-------------|-------------|-------------|
| | Average | Average | Average | Average | Average |
| Manufacturing | 9% | 12% | 8% | 7% | 10% |
| Construction | 10% | 9% | 9% | 11% | 10% |
| Transportation | 5% | 5% | 4% | 5% | 5% |
| Communication | 1% | 1% | 1% | 1% | 1% |
| Wholesale trade | 6% | 6% | 5% | 5% | 11% |
| Retail | 14% | 10% | 15% | 14% | 17% |
| Service | 33% | 29% | 34% | 35% | 33% |
| Agricultural | 11% | 22% | 3% | 8% | 7% |
| Other | 12% | 7% | 22% | 12% | 8% |
| Total | 100% | 100% | 100% | 100% | 100% |



Question 9) Over the year ended June 30, 2013, estimate the percentages of the total dollar value of loans (or credit lines) that qualify as small business lending and that your institution has approved and funded that are secured by collateral and those that are not. The sum of the percentages should total 100 percent.

| | Overall | Midwest | Northeast | South | West |
|-------------------------|-------------|-------------|-------------|-------------|-------------|
| | Average | Average | Average | Average | Average |
| Secured by Collateral | 93% | 96% | 94% | 91% | 92% |
| Unsecured by Collateral | 7% | 4% | 6% | 9% | 8% |
| Total | 100% | 100% | 100% | 100% | 100% |

For those loans (or credit lines) made by your institution over year ended June 30, 2013 that are secured by collateral, estimate the percentages of those loans in each of the following categories. For loans (or credit lines) that are secured by more than one type of collateral, please include these in all categories that apply. The sum of the percentages may exceed 100 percent.

| | Overall | Midwest | Northeast | South | West |
|--|---------|---------|-----------|---------|---------|
| | Average | Average | Average | Average | Average |
| Secured by business-owned real estate collateral | 45% | 39% | 55% | 46% | 40% |
| Secured by business-owned non-real estate collateral | 50% | 53% | 44% | 47% | 59% |
| Secured by personal collateral | 10% | 11% | 9% | 9% | 11% |
| Other | 2% | 1% | 2% | 2% | 2% |



Question 10) Over the year ended June 30, 2013, what action(s) was your institution able to take that your institution may not have taken without the SBLF funding? Please select all responses in the following chart that apply to your institution.

| | Overall | Midwest | Northeast | South | West |
|--|---------|---------|-----------|-------|------|
| | # | # | # | # | # |
| Increase <u>small business lending</u> or reduce it by less than otherwise would have occurred | 274 | 77 | 59 | 102 | 36 |
| Increase <u>other business lending</u> or reduce it by less than otherwise would have occurred | 169 | 52 | 40 | 58 | 19 |
| Increase <u>other non-business lending</u> or reduce it by less than otherwise would have occurred | 99 | 29 | 19 | 40 | 11 |
| Increase securities purchased (e.g., ABS, MBS) | 21 | 8 | 3 | 6 | 4 |
| Make other investments | 8 | 3 | 0 | 2 | 3 |
| Increase reserves for non-performing assets | 12 | 7 | 2 | 2 | 1 |
| Reduce borrowings | 37 | 11 | 6 | 13 | 7 |
| Increase charge-offs | 6 | 3 | 0 | 1 | 2 |
| Purchase another financial institution or purchase assets from another financial institution | 20 | 14 | 0 | 4 | 2 |
| Held as non-leveraged increase in total capital | 86 | 33 | 12 | 29 | 12 |
| Pay dividends or redeem outstanding equity or debt | 10 | 3 | 3 | 3 | 1 |
| Other | 13 | 2 | 5 | 4 | 2 |

| | Overall | Midwest | Northeast | South | West |
|--|---------|---------|-----------|-------|------|
| | % | % | % | % | % |
| Increase <u>small business lending</u> or reduce it by less than otherwise would have occurred | 92% | 93% | 94% | 93% | 84% |
| Increase <u>other business lending</u> or reduce it by less than otherwise would have occurred | 57% | 63% | 63% | 53% | 44% |
| Increase <u>other non-business lending</u> or reduce it by less than otherwise would have occurred | 33% | 35% | 30% | 36% | 26% |
| Increase securities purchased (e.g., ABS, MBS) | 7% | 10% | 5% | 5% | 9% |
| Make other investments | 3% | 4% | 0% | 2% | 7% |
| Increase reserves for non-performing assets | 4% | 8% | 3% | 2% | 2% |
| Reduce borrowings | 12% | 13% | 10% | 12% | 16% |
| Increase charge-offs | 2% | 4% | 0% | 1% | 5% |
| Purchase another financial institution or purchase assets from another financial institution | 7% | 17% | 0% | 4% | 5% |
| Held as non-leveraged increase in total capital | 29% | 40% | 19% | 26% | 28% |
| Pay dividends or redeem outstanding equity or debt | 3% | 4% | 5% | 3% | 2% |
| Other | 4% | 2% | 8% | 4% | 5% |



Question 11) As of June 30, 2013, for each of the following categories of loans (or credit lines), has your institution increased its small business lending by greater than, less than, or about the same amount as it expected over this period at the time it received the SBLF investment?

| | Not Applicable | | Greater than expected | | Less than expected | | About the same | |
|--|----------------|-----|-----------------------|-----|--------------------|-----|----------------|-----|
| | # | % | # | % | # | % | # | % |
| Commercial and industrial | 3 | 1% | 66 | 22% | 32 | 11% | 198 | 66% |
| Owner-occupied nonfarm, nonresidential real estate | 22 | 7% | 63 | 21% | 26 | 9% | 188 | 63% |
| Agricultural production | 144 | 48% | 19 | 6% | 13 | 4% | 123 | 41% |
| Secured by farmland | 124 | 41% | 18 | 6% | 13 | 4% | 144 | 48% |
| Overall small business lending | 0 | 0% | 78 | 26% | 28 | 9% | 193 | 65% |



Question 12) Over the year ended June 30, 2013, which of the following outreach and advertising activities designed to target small businesses owned by members of minority communities, women, and/or veterans has your institution engaged in?

| | Total number of institutions conducting outreach | |
|---|--|-----|
| | # | % |
| Paid advertisement or notices in print, radio, TV, or electronic media communications | 171 | 57% |
| Outreach to media outlets, press, or reporters | 122 | 41% |
| Membership or participation in community organizations and/or trade associations | 244 | 82% |
| Distributing marketing materials targeted to these groups | 143 | 48% |
| Hiring or training staff to conduct outreach to these groups | 96 | 32% |
| Other | 74 | 25% |
| No activities | 17 | 6% |



Question 13) Please estimate your institution’s total expenditures over the year ended June 30, 2013 associated with outreach and advertising activities to small businesses. Your estimate should include expenditures on activities designed to target small businesses owned by members of minority communities, women, and/or veterans. Separately, estimate the dollar value of your institution’s total expenditures that were designed to target small businesses owned by members of minority communities, women, and veterans, respectively. For activities designed to target more than one of these groups, divide the expenditures between the groups as appropriate.

| | Total expenditures |
|---|--------------------|
| All small businesses | \$18,958,605 |
| Small businesses owned by members of minority communities | \$4,235,094 |
| Small businesses owned by women | \$3,820,773 |
| Small businesses owned by veterans | \$1,158,623 |



Question 14) If your institution has completed a partial redemption to date, please describe the reasons for doing so below.

Question 15) Please estimate the calendar quarter and year in which your institution anticipates fully redeeming Treasury’s investment and exiting the SBLF program. If your institution does not anticipate redeeming Treasury’s investment, please indicate this and leave blank questions (16) and (17).

| | Q1 | | Q2 | | Q3 | | Q4 | | Total | |
|------|----|-----|----|----|----|-----|----|-----|-------|-----|
| | # | % | # | % | # | % | # | % | # | % |
| 2014 | 0 | 0% | 9 | 4% | 1 | 0% | 3 | 1% | 13 | 5% |
| 2015 | 2 | 1% | 4 | 2% | 13 | 5% | 40 | 16% | 59 | 24% |
| 2016 | 98 | 40% | 23 | 9% | 6 | 2% | 3 | 1% | 130 | 53% |
| 2017 | 2 | 1% | 0 | 0% | 0 | 0% | 1 | 0% | 3 | 1% |
| 2018 | 2 | 1% | 1 | 0% | 3 | 1% | 1 | 0% | 7 | 3% |
| 2019 | 1 | 0% | 2 | 1% | 27 | 11% | 1 | 0% | 31 | 13% |
| 2020 | 0 | 0% | 0 | 0% | 0 | 0% | 1 | 0% | 1 | 0% |
| 2021 | 0 | 0% | 0 | 0% | 1 | 0% | 2 | 1% | 3 | 1% |



Question 16) What factor(s) most influence your institution’s anticipated timing for exiting the SBLF program? Please select all responses in the following chart that apply to your institution.

| | Number of Institutions | |
|---|------------------------|-----|
| | # | % |
| Dividend or interest rate rises to 9 percent after the initial period (or 13.8 percent for S corps and mutuals) | 228 | 92% |
| Current dividend or interest rate is unattractive | 19 | 8% |
| Lack of opportunities to deploy capital | 13 | 5% |
| Other | 20 | 8% |



Question 17) When your institution exits the SBLF program, how does it plan to replace the SBLF capital?

| | Number of Institutions | |
|--|------------------------|-----|
| | # | % |
| Plan to replace capital through an equity offering | 79 | 32% |
| Plan to replace capital with retained earnings | 162 | 66% |
| Will not need to replace SBLF capital as we presently hold surplus capital | 61 | 25% |
| Other | 65 | 26% |

