Community Banking

Perspective and Dialogue



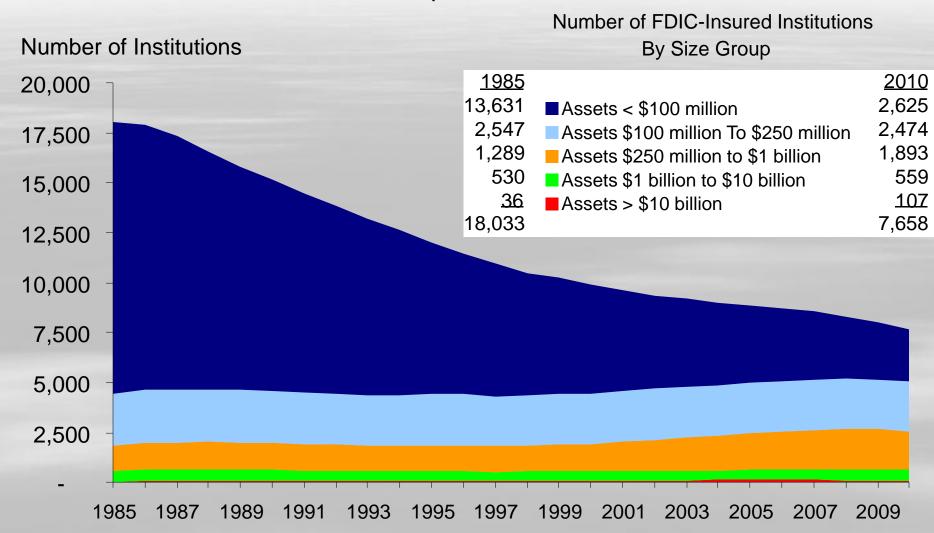
Objectives

- FDIC Initiatives in 2012
- Snapshot of U.S. Community Banks
- Examination Trends
- Regulatory Perspective
- Banking Perspective
- Open Dialogue

2012 Initiatives

- NY Region Directors' College Program
- NY Region Regulatory Teleconferences
- Future of Community Banking Conference
- Community Banking Regional Roundtables
- FDIC Community Banking Research Study
- Review of Community Bank Examination and Rulemaking Processes

All of the net decline in FDIC-insured institutions since 1985 has come from banks under \$100 million.



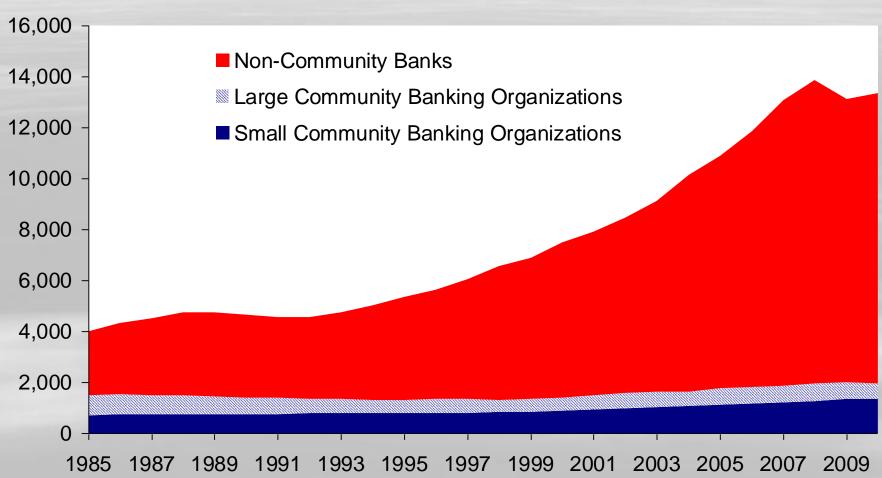
Source: FDIC

What Is a Community Bank?

- Common definition: Total assets < \$1 billion
 - Size threshold needs to be indexed over time
 - Shortcomings:
 - Includes some non-community banks
 - Excludes some banks that look like community banks
- Needed: A better conceptual definition
 - Not <u>purely</u> a function of size
 - Associated with basic banking functions of deposit gathering and lending
 - Business within a fairly circumscribed geographic area
 - Emphasis on "relationship banking" vs. "transactional banking"

The total assets of non-community banks have grown much faster than those of community banks since the early 1990s.

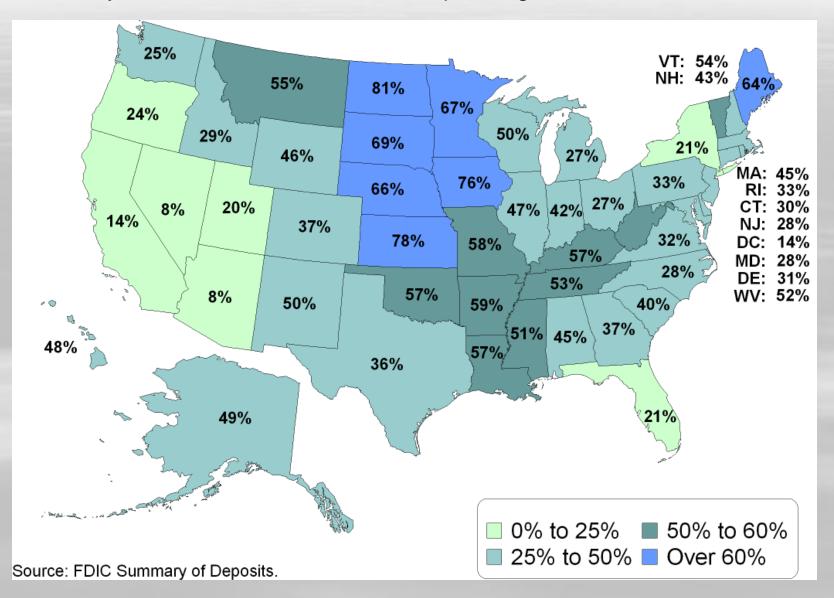
Total Assets, Dollars in Billions



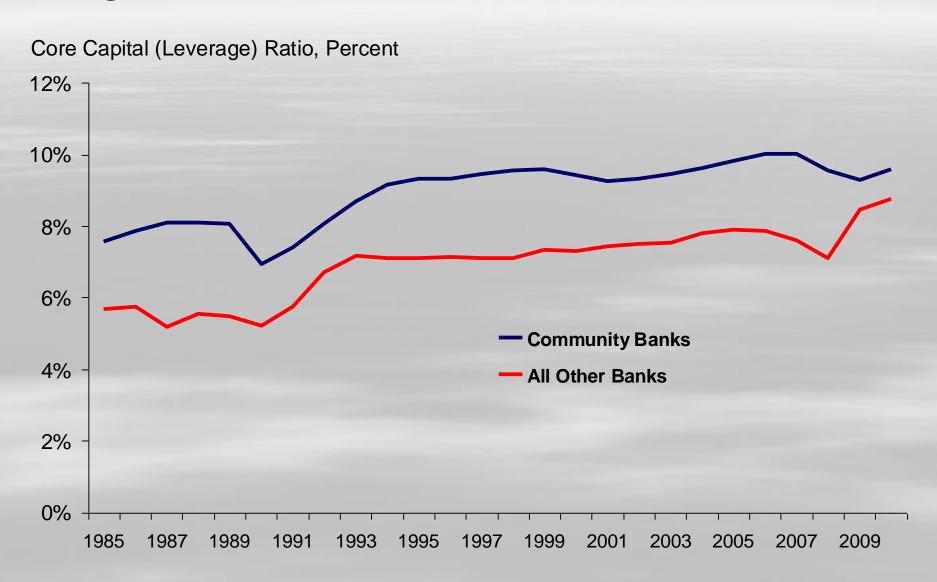
Source: FDIC Community Bank Research Project

Where Do Community Banks Operate?

Community Bank Share of All Branches Operating Within State as of 2Q 2010.

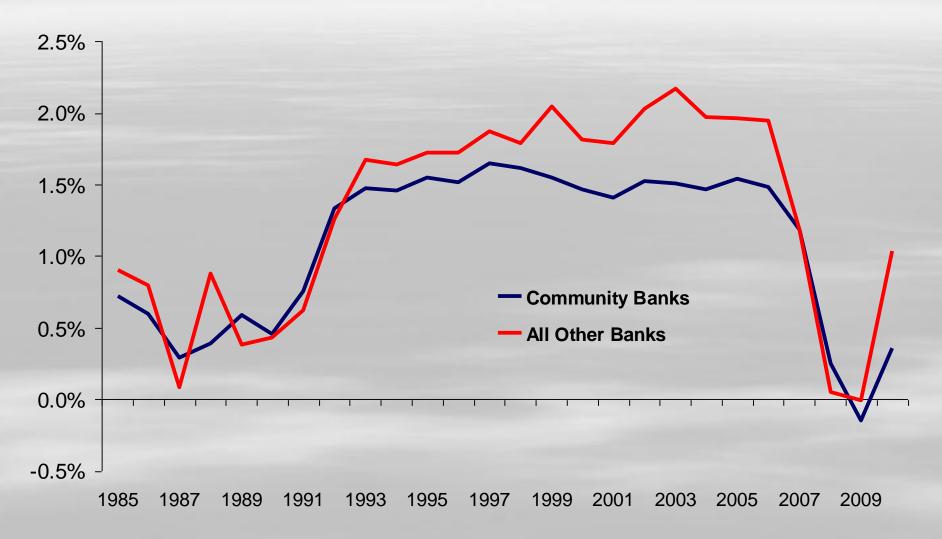


Community banks have traditionally held more capital, on average, than other banks.



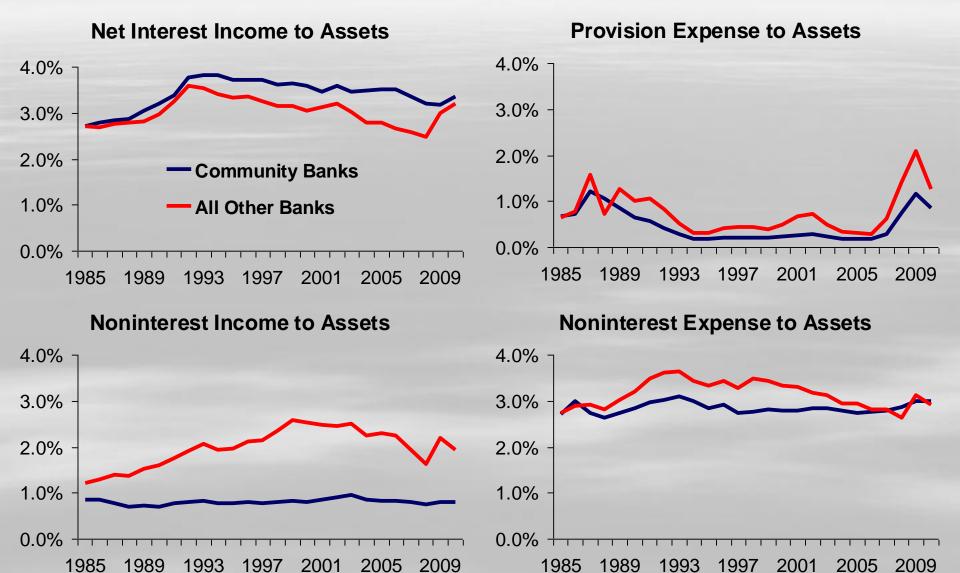
Source: FDIC Community Banking Research Project

Pre-Tax Return on Assets, 1985 - 2010



Source: FDIC Community Banking Research Project

Community Bank Earnings Performance vs. All Other Banks, 1985 - 2010



Impact of Financial Crisis

- Asset Quality Uptick in Loan Delinquencies
- Balance Sheet Growth Inflow of Deposits
- Earnings Challenges Lean or Negative Earnings
- Capital Supports Risk Profile
- Sensitivity to Market Risk

Recent Examination Trends

- Ratings Condition and Migration
- Exam Findings

What We Are Seeing Right Now

- Focus on Long-Term Strategy
- Success of Community Bank Model
 Through Prolonged Economic Slowdown
- Well Managed CRE Concentrations
- Capital Supporting Soft Earnings Trends
- Interest in C&I and Non-Real Estate Lending

Regulatory Perspective

- Focus on Long-Term View & Being Strategic
 - Medium and long term focus Strategic Planning
 - Younger Demographic New Banking Services
 - Stay resilient & mission focused
- Corporate Governance
 - Reporting mechanisms, monitoring (stressing what needs to be stressed, no one-size fits all)
 - Risk Assessments (not ERM)
 - Management depth & succession

Your Perspective

- What new initiatives have been successful for you in past years?
- What are your biggest challenges?
- What will the community bank model look like in 5 years? 10 years?

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Thank You!

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