

PUBLIC DISCLOSURE

June 21, 2010

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

RBC Bank (USA)
1494240

RBC Plaza
301 Fayetteville Street
Raleigh, North Carolina 27601

**Federal Reserve Bank of Richmond
P. O. Box 27622
Richmond, Virginia 23261**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: RBC Bank is rated "SATISFACTORY."

The following table indicates the performance level of RBC Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>RBC BANK</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the institution's rating include:

- The performance within the Charlotte-Gastonia-Rock Hill Multistate Metropolitan Statistical Area (MSA) and each state (North Carolina, Alabama, Georgia, Florida, South Carolina, and Virginia) is rated at least Satisfactory. The performance within the State of North Carolina is given greater weight because of the bank's presence throughout the state. In making this determination consideration was given to the fact that 45.5% and 41.2% of the institution's lending and deposit volume, respectively, and 38.3% of its branch network is contained within North Carolina, exclusive of the multistate MSA.
- Lending activity was consistent with the bank's capacity and market presence.
- A substantial majority of the institution's Home Mortgage Disclosure Act (HMDA), small business, and small farm loans were originated within the bank's assessment areas.
- While the geographic and borrower distribution of loans in the markets reviewed using the full scope review examination procedures is varied; in most cases, however, the performance is considered good.
- A relatively high level of community development lending was provided during the evaluation period.

- A significant level of participation in qualified community development investments responsive to community credit needs was noted and is considered good.
- Delivery systems and branch locations are accessible to all segments of the assessment areas reviewed. Branch closings have not adversely affected low and moderate-income neighborhoods.
- The bank provides a relatively high level of community development services throughout most of the institution's numerous assessment areas.

INSTITUTION

DESCRIPTION OF INSTITUTION

RBC Bank (USA) (RBC) is headquartered in Raleigh, North Carolina, and operates 434 offices throughout North Carolina, Alabama, Georgia, Florida, South Carolina, and Virginia. The institution is a subsidiary of RBC Bancorporation USA (RBCB), a multi-bank holding company also located in Raleigh. RBCB, in turn, is a wholly-owned subsidiary of the Royal Bank of Canada, located in Toronto, Ontario, Canada.

RBC owns several subsidiary entities. Among the subsidiaries is another bank, RBC Bank Georgia, the surviving entity from the August 2009 merger of two RBCB subsidiaries. This bank operates as a limited purpose credit card bank headquartered in Atlanta, Georgia and is subject to its own CRA evaluation. None of its lending or other activities is considered within the context of this evaluation of CRA performance. RBC Bank Georgia serves as the sole provider of retail credit card services for RBC.

As of March 31, 2010, RBC had assets of \$26.1 billion, of which 70.9% were net loans and 10.4% were securities. As of this date, RBC's deposits totaled \$20.1 billion. Various deposit and loan products are available through the institution including loans for residential mortgage, consumer, and business purposes. The following chart details the loan portfolio (using gross loans), as of March 31, 2010:

Composition of Loan Portfolio

Loan Type	3/31/2010	
	\$(000s)	%
Secured by 1-4 Family dwellings	6,599,567	34.1
Multifamily	724,394	3.7
Construction and Development	3,316,771	17.2
Commercial & Industrial/ NonFarm NonResidential	7,027,144	36.4
Consumer Loans and Credit Cards	211,239	1.1
Agricultural Loans/ Farmland	60,827	0.3
All Other	1,388,888	7.2
Total	19,328,830	100.0

As indicated in the preceding table, the bank is an active commercial/small business and residential mortgage lender. Although the bank offers and holds in its portfolio other loans, such as consumer and farm loans, the volume of such lending is relatively small in comparison to the commercial/small business and residential mortgage lending.

The bank serves 57 assessment areas throughout the southeastern United States. Thirty-nine of the assessment areas are located within metropolitan areas and the remaining 18 are located in nonmetropolitan areas. Appendix E contains information about the composition of each assessment area.

Based on its financial capacity, there are no significant limitations on the bank's ability to meet credit needs within the communities it serves. The bank's previous CRA rating was Satisfactory.

SCOPE OF EXAMINATION

The institution was evaluated using the interagency examination procedures developed by the Federal Financial Institutions Examination Council (FFIEC). Consistent with these procedures, HMDA, small business, and small farm lending activity reported by the institution from January 1, 2008, through December 31, 2009, was reviewed. The loan data include both originated and purchased transactions during the two-year time period ending December 31, 2009.

Farm lending totaled 403 loans for 2008 and 2009 within RBC's assessment areas. Only the Bertie, North Carolina market had a sufficient volume that warranted analysis. A total of 231 loans were originated in this market for the evaluation period. The remaining 172 small farm loans are spread over the remaining 56 markets.

Throughout the analysis of lending, loans without reported income or revenue and loans where the reported geographic information is incomplete or extended in a geography with a median family income of zero (or no median family income) are excluded from both bank loan totals and comparative aggregate lending.

Qualified community development loans that were originated or renewed from April 22, 2008, through December 31, 2009, are considered for this evaluation. Also considered are qualified community development services consummated or provided from April 22, 2008 through June 21, 2010. All qualified investments that were outstanding as of the examination date were also considered regardless of when made.

To help determine the availability of community development opportunities in specific assessment areas, the CRA public evaluations of other financial institutions were reviewed. Also, in some markets contact with members of the community were made to discern information about local economic conditions, local credit needs, performance of banks in the assessment area, as well as potential community development opportunities in which bank's might be able to participate.

Ratings for the lending, investment, and service tests as well as an overall rating are assigned for the institution as well as to the Charlotte-Gastonia-Rock Hill Multistate MSA (as the institution has branches in both the North and South Carolina portions of the MSA) and to the States of North Carolina, Georgia, Florida, Virginia, South Carolina, and Alabama. The state ratings are based only on the performance in the assessment areas subject to full scope review and in the case of North Carolina and South Carolina exclude activity in the Charlotte-Gastonia-Rock Hill Multistate MSA, as it is rated separately.

Because of their location and relative size (considering volume of loan activity, proportion of bank deposits, and market population) full scope FFIEC evaluation procedures were applied to the following market areas:

- Charlotte-Gastonia-Rock Hill, NC-SC MSA
- Raleigh-Durham-Cary, NC Combined Statistical Area (CSA)
- Wilmington, NC MSA
- Greensboro-Winston Salem-High Point, NC CSA
- Carteret, NC Assessment Area
- Huntsville-Decatur, AL CSA
- Birmingham-Hoover, AL MSA
- Atlanta-Sandy Springs-Marietta, GA MSA
- Orlando-Deltona-Daytona Beach, FL CSA
- Miami-Fort Lauderdale-Pompano Beach MSA
- Palm Bay-Melbourne-Titusville MSA

- Charleston-North Charleston, SC MSA
- Myrtle Beach-Conway-North Myrtle Beach, SC MSA
- Columbia, SC MSA Virginia Beach-Norfolk-Newport News, VA MSA

The remaining 42 assessment areas were subject to the limited review process also provided for by the FFIEC examination procedures. For assessment areas that are reviewed utilizing the limited scope evaluation procedures, a determination was made as to whether performance was consistent with the assigned overall state rating.

The institution's overall rating and ratings for each test are based on the ratings assigned to the Charlotte-Gastonia-Rock Hill Multistate MSA and the States of North Carolina, Alabama, Georgia, Florida, South Carolina, and Virginia. When assigning the overall ratings for each test, performance within the Multistate MSA and each state is weighted primarily according to activity as measured by relative lending volume, amount of deposits, and number of branches. According to the FFIEC procedures, lending test performance accounts for half of the overall rating, while the investment and service tests are equally weighted with each accounting for 25% of the overall rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test is rated high satisfactory considering overall lending activity, the distribution of lending among borrowers and geographies of different income levels, as well as the amount and responsiveness of community development lending in the bank's assessment areas. Area demographic data, Dun & Bradstreet (D&B) business data, and market aggregate information are used as proxies for demand when evaluating the bank's performance. Aggregated data include RBC and all other reporting institutions that originated and/or purchased loans of the type considered within the bank's assessment areas. All aggregate data presented in the tables in this evaluation are from calendar year 2009. The demographic data used is based on the 2000 census, and D&B business data are current as of 2009.

Throughout the majority of the bank's market areas a high level of small business lending activity is noted for specialized lenders who originate small business loans in the form of credit cards. These loans, however, tend to be much smaller in size than traditional small business bank loans. The presence of these lenders is reflected in a smaller market share for traditional lenders, such as RBC. Not only do such loans tend to be smaller, but when included in the aggregate, these reporters tend to depress the proportion of reported loans to businesses with revenues of \$1 million or less because a large proportion of such loans reported do not include revenue information. These factors were considered as an aspect of performance context when evaluating the level and distribution of bank lending.

Lending Activity:

The bank's quarterly average loan-to-deposit ratio for the eight-quarter period ending March 31, 2010, equaled 95.5% and ranged from 90.2% to 100.7%. As of March 31, 2010, the institution's loan-to-deposit ratio equaled 90.2%. During the same time period, the average quarterly loan-to-deposit ratios of the national peer group ranged from 82.7% to 97.4%. The national peer group is defined as all insured commercial banks having assets greater than \$3 billion. Representing organic growth, since December 31, 2007, bank assets, loans, and deposits increased 2.3%, 19%, and 16.2%, respectively. The bank's loan-to-deposit ratio is indicative of a high degree of responsiveness to the demand for credit.

In an effort to meet the needs of its local communities, the bank offers various loan products including commercial, small business, farm, residential mortgage, home equity, and consumer loans. The total amount (\$4.8 billion) of HMDA, small business, and small farm loans extended during the review period for this evaluation are presented in tabular form in the "Assessment Area Concentration" section that follows this section.

To further meet the needs of the local communities, the bank also offers and/or participates in various special loan programs that offer flexible underwriting criteria to benefit low- and moderate-income people and geographies or promote economic development. These programs include Federal Housing Administration (FHA), Veterans Administration (VA), Small Business Association (SBA), and United States Department of Agriculture (USDA) Rural Housing Services loans. During calendar years 2008 and 2009, the bank originated 1,592 government-sponsored loans totaling \$214.5 million.

RBC has also participated in funding portions of 12 loans in conjunction with the Community Investment Corporation of the Carolinas (CICCAR). CICCAR is an affordable housing loan consortium that provides permanent debt financing for workforce apartment communities throughout North Carolina, South Carolina, and Virginia. The loan proceeds also often serve to redevelop and stabilize low- and moderate-income areas. The bank’s funding for the loans totaled \$9.6 million. Participation in such loan programs that are flexible and involve somewhat complex credit transactions show RBC’s commitment to meet the needs of low- and moderate-income borrowers and/or areas.

Overall, lending activity is considered good relative to the bank’s capacity to lend and the economic conditions within the bank’s market areas. Lending activity is discussed in more detail in the multistate MSA, state, and full scope assessment area sections later in this report.

Assessment Area Concentration:

The institution’s lending volume for reported HMDA, small business, and small farm loans from January 1, 2008, through December 31, 2009, is represented in the following table. Loan data included in the following table reflects all originations and purchases from this time frame. The data, however, does not include large commercial loans (loan amounts in excess of \$1 million), other loan types not noted, or the lending activity of affiliates or subsidiaries.

Comparison of Credit Extended Inside and Outside of Assessment Area(s)

Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	7,030	86.5	1,395,035	84.5	1,097	13.5	256,499	15.5
Home Improvement	278	92.7	29,005	92.4	22	7.3	2,389	7.6
Multi-Family Housing	36	97.3	25,865	98.1	1	2.7	490	1.9
Refinancing	9,504	91.9	1,857,776	91.5	841	8.1	173,414	8.5
Total HMDA related	16,848	89.6	3,307,681	88.4	1,961	10.4	432,792	11.6
Small Business	8,709	95.9	927,195	94.0	376	4.1	59,072	6.0
Small Farm	403	95.3	47,227	95.0	20	4.7	2,466	5.0
TOTAL LOANS	25,960	91.7	4,282,103	89.7	2,357	8.3	494,330	10.3

As indicated in the preceding table, a substantial majority of loans, both by number and dollar amount for the product lines included in the analysis have been provided to residents and businesses of the bank’s assessment areas.

Geographic and Borrower Distribution:

When evaluating the geographic and borrower distribution for a specific loan category (HMDA, small business, and small farm) within an assessment area, primary emphasis is placed on the number of loans originated or purchased. When considering all loan products to arrive at an overall conclusion, the level of performance of each category is weighted by the dollar volume of each category. Similarly, when the performance of multiple assessment areas is considered to reach a state and/or institutional rating, the levels of performance of the assessment areas subject to full scope reviews are weighted primarily according to their dollar volume during the review period. In all cases, conclusions also take into consideration relevant performance context factors.

As previously noted, the lending activity of specialized credit card lenders is considered as a performance context factor. This particular factor is relevant when evaluating the bank's small business lending distribution by revenue of business using aggregate data as a proxy for demand.

While the geographic and borrower distribution of loans in the markets reviewed using the full scope review examination procedures is varied, in most cases, the performance is considered good, for HMDA and small business lending.

Community Development Lending:

The bank has originated or renewed a good level of loans for a variety of community development purposes totaling approximately \$76.1 million. Several of these loans were made to organizations that develop affordable housing projects within statewide areas which include the bank's market areas, even though the specific projects that the bank's loans funded may not be located within the bank's specified assessment areas.

INVESTMENT TEST

The institution's level of responding to community development needs through its investment activities is rated high satisfactory. Investments in equity housing funds, a licensed community development company, Low Income Housing Tax Credits (LIHTCs), limited partnerships, and limited liability companies have been made. As of the date of the evaluation, RBC held \$77.2 million (current book value) in qualified investments.

Qualified investments that impact geographic regions which encompass multiple bank market areas include the following:

- A combined commitment to invest \$37.5 million in nine of the Community Affordable Housing Equity Corporation's (CAHEC) equity funds. Approximately \$36.4 million has been funded and is currently outstanding. The funds invest in low-income housing tax credit (LIHTC) projects that predominately provide for multifamily housing and in some cases historic rehabilitation. CAHEC invests in projects throughout the mid-Atlantic and southeast region of the country. Several of the bank's investments provide funding across a multistate area while others primarily serve North Carolina.
- The bank has committed to invest \$1.5 million in Plexus Capital, a small business investment company (SBIC) that invests primarily in the mid-Atlantic and southeast portion of the country. SBICs are privately owned and operated investment companies licensed by the Small Business Administration. SBICs provide venture capital to small independent businesses in the form of equity investments and subordinate debt. Thus far, the bank has funded \$1.2 million of this commitment.
- RBC holds \$5.5 million in targeted mortgage-backed securities. These securities are comprised of bundles of mortgages primarily made to low- and moderate-income borrowers in South Carolina, Florida, Georgia, and Virginia.

The institution also actively supports numerous community development organizations through grants and/or donations. From April 22, 2008, to June 21, 2010, donations totaling \$502.8 thousand were made to community development organizations whose operations assist low- and moderate-income people, areas, or support micro-enterprise development.

RBC's affiliate, Apollo Equity Partners, also provides the bank with access to an organization specializing in LIHTC and historic tax credit projects which generally enhance access to affordable homes. In addition to acquiring affordable housing and historic tax credit properties, the company provides asset management services for projects in which it is involved. Although the affiliate is wholly

owned by RBC's parent company, since the company is involved in projects throughout the entire United States, consideration is given only for projects that RBC is involved in through Apollo that directly impact its assessment areas or a broader statewide or regional area that includes the bank's assessment areas. These projects will be discussed in the evaluation of those areas.

Other investments targeting specific assessment areas are discussed in conjunction with the evaluation of those areas. Since some of the bank's investments target broad areas, state ratings for this test consider the total dollar amount of investments that benefit any of the bank's markets within the state.

SERVICE TEST

The bank's overall performance under the service test is rated high satisfactory. Delivery systems, branch locations, and hours of operation are considered accessible and convenient to all portions of the assessment areas and do not vary significantly among markets. Of the 434 branch offices present during this evaluation period, 11 (2.5%) are located within low-income areas and 59 (13.6%) are located in moderate-income areas.

The bank also actively supports community development organizations that provide community development services throughout its various market areas, as well as on a statewide and multistate basis. Many of these activities impact a multistate regional area in addition to statewide initiatives. In an effort to promote homeownership among low- and moderate-income people, the bank has taken the lead in identifying and bringing together realtors, local and state agencies, non-profit community organizations, and lenders with affordable housing programs. RBC successfully organized sessions with such attendees in multiple areas. Additionally, the bank and its employees seek out and participate, as instructors and facilitators, in numerous classes and seminars promoting affordable housing opportunities within those markets. The information covered during the events includes credit responsibility, financial management, the home buying process, and mortgage loan process. The events are generally targeted to low- and moderate-income individuals within the communities the bank serves.

RBC employees also participate in small business development classes and seminars. Bank employees provide instruction and direction during sessions sponsored by local small business incubators and area colleges and universities. Additionally, the bank has a program called "Working for You" that offers no fee, no minimum balance checking, as well as additional benefits for employees working for businesses that join the plan.

Overall, these activities show the bank's relatively high level of community service as well as support of affordable housing efforts within the markets it serves. Other activities at statewide and/or assessment area levels are discussed within the corresponding sections of this evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Adequate policies, procedures, and training programs have been developed to support nondiscrimination in lending activities.

MULTISTATE METROPOLITAN AREA

CRA RATING FOR CHARLOTTE-GASTONIA-ROCK HILL, NC-SC MSA¹: SATISFACTORY

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is considered good and is consistent with the bank's capacity in helping to meet identified community credit needs within a highly competitive market.
- While varying by product, the borrower distribution is considered adequate overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- While varying by product, the geographic distribution is considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- An adequate level of community development loans has been extended to meet affordable housing, economic development projects, and other community needs.
- The bank maintains a significant level of qualified investments that benefit statewide and regional areas, including this market area.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A relatively high level of participation in qualified community development services that generally benefit affordable housing and micro-enterprise development was noted.

SCOPE OF EXAMINATION

The lending test review considered HMDA, and small business loans, originated or purchased, from January 1, 2008, through December 31, 2009. Small farm lending was not analyzed because of the lack of volume. Community development loans made during this period and qualified community development services provided through the evaluation date were considered. All qualified investments extended during the review period or outstanding as of the examination date regardless of when made were also considered.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHARLOTTE-GASTONIA-ROCK HILL, NC-SC MSA

This assessment area includes the entire Charlotte-Gastonia-Rock Hill MSA which has a population of over 1.3 million. The bank operates 17 branches within this market area. As of June 2009, RBC ranked 7th in deposit market share having .5% of the assessment area's available Federal Deposit Insurance Corporation (FDIC) insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA, and Bank of America NA accounting for a deposit market share of 92.4%. According to 2009 aggregate loan data, RBC ranked 33rd in reported residential mortgage loans and 25th in reported small business loans. The aggregate data include 594 residential mortgage loan and 105 small business loan reporters. Both market share rankings consider originated and purchased loans.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

According to 2000 census data, for this assessment area the median housing value was \$119,826. The area owner-occupancy rate (63.1%) slightly exceeds the North Carolina (61.6%) rate and nearly equals the South Carolina (63.2%) rate. The area family poverty rate (6.8%) trails the North Carolina (9%) and South Carolina (10.7%) state rates. The 2008, 2009, and 2010 median family incomes for the MSA equaled \$64,300, \$66,500, and \$67,200, respectively.

The following table provides both family and household demographic information for the assessment area as well as the tract and owner-occupied housing unit distribution by tract income level. It also provides D&B business data.

Assessment Area Demographics

Charlotte-Gastonia-Rock Hill, NC-SC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	6.0	9,843	2.8	2,930	29.8	67,708	19.2
Moderate	73	27.3	76,221	21.6	9,553	12.5	64,803	18.3
Middle	114	42.7	174,190	49.3	9,670	5.6	80,707	22.8
Upper	62	23.2	93,079	26.3	2,004	2.2	140,115	39.7
NA	2	0.7	0	0.0	0	0.0		
Total	267	100.0	353,333	100.0	24,157	6.8	353,333	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	4,254	1.2	14,464	2.8	4,569	31.6	108,803	21.3
Moderate	62,544	18.1	116,865	22.9	16,947	14.5	90,192	17.7
Middle	176,952	51.3	250,047	49.0	19,098	7.6	104,395	20.4
Upper	101,114	29.3	129,274	25.3	4,754	3.7	207,268	40.6
NA	0	0.0	8	0.0	0	0.0		
Total	344,864	100.0	510,658	100.0	45,368	8.9	510,658	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	2,587	3.1	2,139	2.8	290	5.9	158	3.7
Moderate	14,908	17.6	13,034	17.3	1,041	21.3	833	19.5
Middle	38,215	45.2	34,011	45.1	2,190	44.9	2,014	47.3
Upper	28,775	34.0	26,174	34.7	1,350	27.7	1,251	29.4
NA	75	0.1	60	0.1	9	0.2	6	0.1
Total	84,560	100.0	75,418	100.0	4,880	100.0	4,262	100.0
	Percentage of Total Businesses:			89.2		5.8		5.0

*NA-Tracts without household or family income as applicable

The multistate assessment area benefits from a diverse economy and includes major employers such as Bank of America Corporation, Carolinas Healthcare System, Duke Energy Corporation, as well as area school systems. Various state and municipal agencies also provide a large number of employment opportunities. The unemployment rates for the three prior years are presented in the following table:

	June 2008	June 2009	June 2010
Charlotte-Gastonia-Rock Hill, NC-SC MSA	6.2%	12.3%	11.4%
North Carolina	6.1%	11.2%	10.6%
South Carolina	6.5%	11.9%	11.1%

Unemployment rates have risen sharply during the most recent three year time frame. The higher unemployment rates reflect weakness associated with the nation's recent economic recession producing a decline in economic activity and associated business lending.

Two community contacts were made within the MSA to discuss local economic conditions and community credit needs. One of the contacts indicated an opportunity for area financial institutions to provide more financial education programs targeted to small businesses, particularly given a perception among local businesses that credit standards have been tightened. Both contacts indicated that local financial institutions are nonetheless generally supportive of the local community.

Overall, review of performance context information indicates that local opportunities are considerable for community development loans and investments within the market area and RBC does not face any significant constraints in its capacity to take advantage of such community development opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE-GASTONIA-ROCK HILL, NC-SC MSA

LENDING TEST

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (4.9%) and dollar volume (6.3%), is considered good, as it is comparable to or exceeds both the percentage of branch offices (3.9%) and the proportion of the bank's deposits (5%) in the assessment area. During the review period, one small farm loan totaling \$10,000 was originated within this assessment area. This loan is not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Charlotte-Gastonia-Rock Hill, NC-SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(105)				Home Purchase (31,993)			
Low	1	1.0	113	0.4	220	0.7	30,022	0.5
Moderate	15	14.3	2,702	8.8	3,492	10.9	423,662	7.6
	(334)				Refinance (61,634)			
Low	1	0.3	150	0.2	305	0.5	56,282	0.4
Moderate	23	6.9	3,925	5.2	4,599	7.5	643,530	5.1
	(8)				Home Improvement (1,403)			
Low	0	0.0	0	0.0	9	0.6	902	0.6
Moderate	2	25.0	83	6.2	205	14.6	11,860	7.6
	(0)				Multi-Family (45)			
Low	0	0.0	0	0.0	1	2.2	395	0.3
Moderate	0	0.0	0	0.0	15	33.3	6,415	4.8
	HMDA Totals							
Low	2	0.4	263	0.2	535	0.6	87,601	0.5
Moderate	40	8.9	6,710	6.2	8,311	8.7	1,085,467	5.9
Middle	152	34.0	28,843	26.8	42,902	45.1	6,995,963	37.9
Upper	253	56.6	71,849	66.7	43,326	45.6	10,277,833	55.7
NA*	0	0.0	0	0.0	1	0.0	125	0.0
Total	447	100.0	107,665	100.0	95,075	100.0	18,446,989	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Home refinance lending performance is given significantly greater weight in the overall geographic distribution analysis of HMDA lending because of the product's significance for both the bank and aggregate lenders. Home purchase lending represents the only other category of lending with any significant weight as there were only seven home improvement loans and no multifamily loans originated by the bank in 2009. As displayed above, the bank's performance for home purchase lending is considered excellent in both low- and moderate-income tracts. Its refinance lending performance is considered adequate in low-income tracts and good in moderate income tracts.

Overall, the bank's performance in both low- and moderate-income tracts, by number of loans, is comparable to 2009 aggregate lending though slightly lower than the percentage of owner-occupied housing units in low-income tracts (1.2%) and in moderate-income tracts (18.1%). Aggregate lending suggests that this demographic proxy may overstate effective demand for credit in these geographies. The 2009 performance level is similar to the bank's 2008 performance overall when .3% and 12.4% of HMDA lending was located in low- and moderate-income tracts, respectively. Overall, RBC's performance for both years is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Charlotte-Gastonia-Rock Hill, NC-SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	9	4.6	2,254	8.6	960	2.6	72,633	4.4
Moderate	36	18.6	4,930	18.8	6,283	16.8	284,276	17.4
Middle	70	36.1	5,708	21.8	17,602	47.1	696,556	42.6
Upper	79	40.7	13,270	50.7	12,516	33.5	576,653	35.3
NA*	0	0.0	0	0.0	29	0.1	3,670	0.2
Total	194	100.0	26,162	100.0	37,390	100.0	1,633,788	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 3.1% and 17.6% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, in 2009, bank lending to businesses in both low- and moderate-income tracts exceeded both 2009 aggregate lending and D&B demographic proxies for demand. This level of performance is considered good and represents an increase over RBC's 2008 performance when 2.7% and 16.6% of the bank's small business lending occurred in low- and moderate-income census tracts, respectively. Nonetheless, the bank's 2008 lending was comparable to the aggregate lending in low-income tracts (2.8%) and slightly exceeded the aggregate lending level in moderate income-tracts (15%). This performance was also considered good, and overall, the RBC's small business performance is considered good.

The overall geographic loan distribution within this assessment area is considered good given the institution's size, branch locations, effective demand for credit, and the bank's lending performance for both the HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Charlotte-Gastonia-Rock Hill, NC-SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(105)				(28,051)			
Low	8	7.6	943	3.1	3,974	14.2	394,882	7.8
Moderate	21	20.0	2,939	9.5	8,402	30.0	1,121,208	22.3
	(334)				(50,434)			
	Refinance							
Low	7	2.1	517	0.7	3,203	6.4	340,602	3.2
Moderate	54	16.2	6,556	8.7	8,458	16.8	1,121,277	10.7
	(7)				(1,336)			
	Home Improvement							
Low	0	0.0	0	0.0	168	12.6	7,128	4.8
Moderate	0	0.0	0	0.0	253	18.9	17,265	11.7
	(0)				(0)			
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	15	3.4	1,460	1.4	7,345	9.2	742,612	4.7
Moderate	75	16.8	9,495	8.8	17,113	21.4	2,259,750	14.4
Middle	67	15.0	11,090	10.3	17,668	22.1	2,908,259	18.5
Upper	289	64.8	85,552	79.5	37,695	47.2	9,781,529	62.3
Total	446	100.0	107,597	100.0	79,821	100.0	15,692,150	100.0
Unknown	1		68		15,254		2,754,839	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

Within this market, home refinance transactions represent the significant HMDA lending category both by number and dollar volume of loans for both the bank and all HMDA reporters. Home purchase loans were the second most active product, while home improvement lending was negligible by comparison. Accordingly, the performance associated with the bank's refinance lending is given significantly more weight when evaluating its borrower distribution performance. As reflected in the preceding table, the bank's lending to low-income borrowers is considered poor for both home purchase and home refinance transactions. Its lending to moderate-income borrower is considered good for home refinance loans and adequate for home purchase loans. While its home improvement lending is considered poor, given that the bank made only seven such loans in the market in 2009, this performance carries very little weight in the evaluation of the bank's overall performance.

Overall, the 3.4% of bank HMDA loans made to low-income borrowers lags the percentage of such families residing in the assessment area (19.2%), and approximates one third of the proportion of aggregate lending to low-income borrowers. The percentage of HMDA loans made to moderate-income borrowers is less than, though still somewhat comparable to both the percentage of moderate-income families living in the assessment area (18.3%) and the percentage of aggregate lending to moderate-income borrowers. The bank's overall performance during 2009 is considered adequate and reflects the relative strength of its home refinance lending to moderate-income borrowers. RBC's 2008 lending performance was substantially similar.

Distribution of Lending by Loan Amount and Size of Business

Charlotte-Gastonia-Rock Hill, NC-SC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	87	44.8	10,044	38.4	9,009	23.7	726,863	44.3
Over \$1 Million	100	51.5	16,064	61.4	NA	NA	NA	NA
Unknown	7	3.6	54	0.2	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	137	70.6	3,285	12.6	34,516	91.0	400,588	24.4
\$100,001-\$250,000	21	10.8	3,956	15.1	1,659	4.4	298,948	18.2
\$250,001-\$1 Million	36	18.6	18,921	72.3	1,772	4.7	941,958	57.4
Total	194	100.0	26,162	100.0	37,947	100.0	1,641,494	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 23.7% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 89.2% of all businesses have revenues that do not exceed \$1 million per year. Excluding specialized lenders, 63.9% reported small business loans were to businesses having revenues of \$1 million or less. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. During the evaluation period, 44.8% of the bank’s small business loans were to businesses with annual revenues of \$1 million or less. This level of lending is considered adequate.

RBC’s 2008 performance reflects a stronger level of lending as 58.3% of its small business lending was to businesses with revenues of \$1 million or less. Adjusted to exclude specialized lenders, 55.4% of aggregate small business lending in 2008 was to businesses with revenues of \$1 million or less. In this context, the bank’s level of performance is considered good. On a combined basis, greater weight is given to the bank’s 2008 performance as the dollar volume of lending for that year was about 1.6 times 2009 lending volume. RBC’s lending to businesses of different income levels is considered good.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered adequate using aggregate data and area demographics as proxies for demand.

Community Development Loans:

During the evaluation period, the bank originated three community development loans totaling \$476,000. One loan for \$160,000 facilitated affordable housing for seniors while another for \$66,000 was for another affordable housing project. The other loan for \$250,000 was to an organization providing community services to low- and moderate-income people. This level of community development lending is considered adequate.

INVESTMENT TEST

As previously noted, the bank has numerous qualified investments that benefit multistate and statewide areas that include the Charlotte-Gastonia-Rock Hill MSA. One affordable housing project has been funded by the bank’s investment in the RBC Apollo 2007-B National Fund, L.P for \$6 million. The bank has an investment of approximately \$462,000 in Gastonia Housing I Limited partnership, a multifamily LIHTC project located in the Charlotte-Gastonia-Rock Hill NC-SC MSA. Additionally, five projects have been funded by the bank’s investment in CAHEC within this market. Charitable donations of \$7,500 have also been made that are considered qualified community development investments. These donations support organizations whose operations are targeted towards economic development and financial literacy endeavors. RBC’s performance under the investment test for the Charlotte-Gastonia-Rock Hill NC-SC MSA is rated high satisfactory.

SERVICE TEST

Within this assessment area, the bank's performance under the service test is rated good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 17 branch offices within this assessment area. Three of the branches (17.6%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 2.8% and 21.6% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

RBC and its employees participate in a relatively high level of community development services, particularly at the statewide and multistate levels, that benefit this assessment area and that either have been discussed previously or are discussed in the next section regarding performance in North Carolina. Community development activities specific to this assessment area include the following:

- A bank officer serves on the board of directors of a of a local health services organization that provides medical and dental services to low- and moderate-income individuals.
- A bank employee serves as a loan executive for a non-profit that coordinates fundraising and distribution of funds for other non-profits agencies in Gaston County.
- A bank employee has assisted in disseminating financial literacy to local elementary schools in conjunction with an agency primarily targeting at-risk students.

STATE

CRA RATING FOR NORTH CAROLINA²: SATISFACTORY

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- While varying by product, both geographic and borrower distribution are considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- A relatively high level of community development loans has been extended to assist affordable housing, economic development projects, and other community needs.
- The bank maintains a significant level of qualified investments that benefit statewide, and regional areas, as well as this assessment area.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A relatively high level of participation in qualified community development services that generally benefit affordable housing and micro-enterprise development was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are 20 assessment areas within the State of North Carolina, when excluding the portion of the State that is included in the multistate MSA. The composition of each of these assessment areas is found in **APPENDIX E** of this evaluation.

On a combined basis, the 20 statewide assessment areas account for 45.5%, 38.3%, and 41.2% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the State of North Carolina was evaluated by reviewing the Raleigh-Durham-Cary CSA, Wilmington MSA, Greensboro-Winston Salem-High Point, NC CSA, and the Carteret assessment areas using full scope interagency examination procedures. In arriving at an overall state rating, individual assessment area performance was generally weighted by the dollar volume of lending. Therefore, the greatest weight was given to performance in the Raleigh-Durham-Cary CSA assessment area. For assessment areas subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

The institution has 166 branch offices located throughout the State of North Carolina (excluding branches in the multistate MSA) and ranks 4th in deposit market share having 7.1% of the state's available FDIC insured deposits within the markets that the bank has branches (credit union deposits are not included). One (.6%) office is located in a low-income area and 25 (15.1%) are located in moderate-income areas. The bank holds approximately \$7.6 billion in deposits within the statewide area.

Based on 2000 census data, the North Carolina assessment areas have a total population of approximately 5.7 million, including 1.5 million families. A majority of the families are middle- and upper-income (62.4%), while low- and moderate-income families comprise 19.8% and 17.8% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 60.2%, and 9.5% of North Carolina families live below the poverty level.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

Overall, the statewide lending test is rated high satisfactory. Of the four markets reviewed with full scope procedures, the greatest weight was given to the performance within the Raleigh-Durham-Cary CSA assessment area as the largest dollar volume of loans (12.6%) were extended within this assessment area for the statewide area. Lending activity is considered good and is measured primarily by market share. Distribution of lending, both geographic and borrower, and the provision of community development loans are all considered good.

Lending Activity:

Overall, lending activity is considered good and consistent with the bank's capacity. According to 2009 market share data, the bank ranks 16th and 14th in small business and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's distribution of lending is considered good. Lending performance varies significantly by both product and market. When reaching overall conclusions, HMDA lending performance received the most weight as the category typically accounted for significantly greater volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank extended a relatively high level of lending by dollar volume that qualifies as community development loans. During the evaluation period, RBC originated 21 loans totaling \$66.8 million within North Carolina. The loans facilitated the renovation and revitalization of property and the provision of community services. All loans originated in this state are discussed in their respective market.

INVESTMENT TEST

The institution's level of qualified investments benefiting North Carolina is considered high satisfactory. In addition to investments that benefit multistate areas, the institution holds nine investments consisting of CAHEC equity funds totaling \$24 million (current balance) that benefit the statewide area or portions of North Carolina. Additionally, the institution actively supports various organizations that provide for community development. During the evaluation period, the bank made donations of approximately \$27,500 to organizations providing community development services on a statewide basis.

SERVICE TEST

The statewide rating for the institution under the service test is rated high satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the North Carolina markets are representative of those offered by the institution overall. Community development services that benefit the statewide area include two bank employees contributing time and banking expertise as board members to a state partnership that promotes economic development. Additional community development services are discussed in the market which received the benefit of the bank employee outreach.

METROPOLITAN AREAS

*(For metropolitan areas with some or all assessment areas
reviewed using full-scope review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN RALEIGH-DURHAM-CARY, NORTH CAROLINA CSA

This assessment area includes portions of the Raleigh-Cary, NC MSA and the Durham-Chapel Hill, NC MSA, and it has a population of approximately 1.1 million. The bank operates 32 branches within this market area. As of June 2009, RBC ranked 6th in deposit market share having 7.8% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., BB&TC, and SunTrust Bank accounting for a deposit market share of 46.5%. According to 2009 aggregate loan data, RBC ranked 22nd in reported residential mortgage loans and 16th in reported small business loans. The aggregate data include 564 residential mortgage and 104 small business loan reporters. Both market share rankings consider originated and purchased loans.

Census data for 2000 reflects an assessment area median housing value of \$141,057. The assessment area's owner-occupancy rate (59.7%) is similar to the overall state rate (61.6 %). The area's family poverty rate of 6.5% is significantly lower than overall state rate of 9%. The 2008, 2009, and 2010 estimated median family incomes for the Raleigh-Cary MSA were \$74,900, \$76,900, and \$77,700, respectively. The Durham-Chapel Hill MSA estimated median family incomes for 2008, 2009, and 2010 equaled \$62,100, \$65,500, and \$66,500, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Raleigh-Durham-Cary, NC CSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	20	9.9	11,925	4.1	3,712	31.1	55,506	19.2
Moderate	40	19.7	46,769	16.2	5,815	12.4	50,468	17.5
Middle	91	44.8	146,419	50.7	7,370	5.0	64,721	22.4
Upper	50	24.6	83,595	29.0	1,973	2.4	118,013	40.9
NA	2	1.0	0	0.0	0	0.0		
Total	203	100.0	288,708	100.0	18,870	6.5	288,708	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	4,449	1.6	23,165	5.2	8,710	37.6	97,064	21.9
Moderate	38,971	13.7	77,184	17.4	12,244	15.9	75,208	17.0
Middle	151,282	53.3	222,622	50.2	17,075	7.7	85,637	19.3
Upper	88,888	31.3	120,468	27.2	5,938	4.9	185,583	41.8
NA	0	0.0	53	0.0	0	0.0		
Total	283,590	100.0	443,492	100.0	43,967	9.9	443,492	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	1,951	2.6	1,693	2.5	144	3.5	114	3.4
Moderate	9,685	12.8	8,606	12.6	591	14.3	488	14.6
Middle	42,003	55.5	37,739	55.3	2,383	57.5	1,881	56.3
Upper	21,732	28.7	19,907	29.2	989	23.9	836	25.0
NA	359	0.5	300	0.4	36	0.9	23	0.7
Total	75,730	100.0	68,245	100.0	4,143	100.0	3,342	100.0
	Percentage of Total Businesses:			90.1		5.5		4.4

*NA-Tracts without household or family income as applicable

Employment opportunities exist among technology, manufacturing, government, retail/wholesale trade, and services industries. Major employers for the area include International Business Machines Corporation, Duke and North Carolina State Universities, public school systems, and GlaxoSmithKline Incorporated. Rising unemployment evidences economic weakness and the unemployment rates for the three prior years are presented in the following table:

	June 2008	June 2009	June 2010
Raleigh-Durham-Cary, NC CSA	5.1%	9.2%	8.4%
North Carolina	6.1%	11.2%	10.6%

A community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact indicated that, despite the recent recession, the Raleigh area has not felt the impact of the recession as severely as other areas. The contact attributed this to the generally high education level of area residents and a relatively low, overall cost of living. The contact indicated that

local financial institutions are supportive of the local community, specifically mentioning RBC Bank's engagement level as positive within the area. In addition to this community contact, public CRA performance evaluations for other local financial institutions were reviewed to identify potential community development opportunities.

Overall, performance context information suggests that local opportunities are considerable for community development loans and investments within the market area. Given the bank's strategy, RBC faces no constraints to engaging in community development endeavors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered excellent. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (12%) and dollar volume (12.6%), is consistent with the percentage of branch offices (7.4%) and deposits (10.5%) in the assessment area and is considered good. During the review period, 20 small farm loans totaling \$1.2 million were extended during the review period within this assessment area. These loans are not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Raleigh-Durham-Cary, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(330)				Home Purchase (31,252)			
Low	6	1.8	593	0.8	330	1.1	45,772	0.8
Moderate	31	9.4	4,647	6.2	2,673	8.6	347,659	5.9
	(765)				Refinance (65,969)			
Low	2	0.3	262	0.2	401	0.6	64,261	0.5
Moderate	80	10.5	11,431	7.1	3,712	5.6	530,528	3.8
	(9)				Home Improvement (1,339)			
Low	0	0.0	0	0.0	26	1.9	2,662	1.6
Moderate	0	0.0	0	0.0	138	10.3	7,773	4.8
	(0)				Multi-Family (74)			
Low	0	0.0	0	0.0	15	20.3	12,913	5.3
Moderate	0	0.0	0	0.0	13	17.6	34,812	14.4
	HMDA Totals							
Low	8	0.7	855	0.4	772	0.8	125,608	0.6
Moderate	111	10.1	16,078	6.8	6,536	6.6	920,772	4.5
Middle	562	50.9	113,866	47.9	54,353	55.1	10,185,620	50.2
Upper	423	38.3	107,023	45.0	36,962	37.5	9,074,627	44.7
NA *	0	0.0	0	0.0	11	0.0	2,646	0.0
Total	1,104	100.0	237,822	100.0	98,634	100.0	20,309,273	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market, refinance transactions were the largest HMDA lending category both by number and dollar volume of loans while home purchase loans ranked second. Performance for both products is similar. Home improvement lending accounted for significantly less volume both by number and dollar of loans and is accorded little weight in this analysis.

Overall, the bank's performance in low-income tracts, by number of loans, is comparable to the 2009 aggregate lending level though it lags the percentage of owner-occupied housing units in that tract (1.6%). In moderate-income tracts, the bank's proportion of lending is greater than that of aggregate lenders in the market though it is slightly less than the percentage of owner-occupied housing units (13.7%) within the market. Considering the effective demand for credit evidenced by aggregate lending, this level of lending is considered excellent. The bank's 2008 performance was considered good showing comparatively better performance in low-income tracts but somewhat lesser performance in moderate-income tracts. Overall, the bank's lending performance is deemed excellent considering both years and the greater dollar lending volume in 2009 (\$237.8 million) compared to 2008 (\$176.9 million).

Distribution of Small Business Loans by Income Level of Census Tract

Raleigh-Durham-Cary, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	9	1.8	270	0.7	606	1.9	27,462	2.0
Moderate	50	10.2	2,877	7.2	4,003	12.7	190,747	13.8
Middle	280	57.4	25,423	63.4	16,854	53.6	745,073	53.9
Upper	147	30.1	11,505	28.7	9,842	31.3	412,593	29.9
NA*	2	0.4	50	0.1	114	0.4	5,216	0.4
Total	488	100.0	40,125	100.0	31,419	100.0	1,381,091	100.0

*NA-Tracts without household or family income as applicable

During 2009, the bank’s level of small business lending in low- and moderate-income areas is comparable to both the 2009 D&B demographic proxies (2.6% and 12.8%, respectively), and the 2009 aggregate lending level. The bank’s level of lending for 2009 is considered good. During 2008, the bank’s performance was stronger. RBC originated 2% and 13.1% of small business loans in low- and moderate-income census tracts, respectively. The bank’s performance during 2008 is considered excellent. The bank’s performance was weighted higher for 2008 due to greater loan volume (\$85 million for 2008 and \$40.1 million for 2009). Thus, RBC’s overall small business geographic distribution performance is considered excellent.

The overall geographic loan distribution within this assessment area is considered excellent given the institution’s size, branch locations, effective demand for credit, and the bank’s lending performance for both the HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Raleigh-Durham-Cary, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(325)				Home Purchase (27,272)			
Low	42	12.9	4,639	6.2	3,663	13.4	421,779	7.9
Moderate	89	27.4	12,275	16.4	7,742	28.4	1,151,045	21.7
	(739)				Refinance (53,474)			
Low	37	5.0	3,855	2.5	3,317	6.2	393,216	3.4
Moderate	115	15.6	15,599	10.0	8,856	16.6	1,305,382	11.4
	(7)				Home Improvement (1,251)			
Low	1	14.3	210	26.0	109	8.7	6,305	4.2
Moderate	0	0.0	0	0.0	203	16.2	15,219	10.2
	(0)				Multi-Family (0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	80	7.5	8,704	3.8	7,089	8.6	821,300	4.8
Moderate	204	19.0	27,874	12.0	16,801	20.5	2,471,646	14.6
Middle	230	21.5	40,744	17.6	20,638	25.2	3,840,739	22.7
Upper	557	52.0	154,154	66.6	37,469	45.7	9,815,802	57.9
Total	1,071	100.0	231,476	100.0	81,997	100.0	16,949,487	100.0
Unknown	33		6,346		16,637		3,359,786	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

When considering the bank and aggregate data from 2009, refinance and home purchase loans represent the largest proportion of both bank and aggregate lending. Performance is similar for both loan categories and drive the overall performance.

On a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (19.2%) but is comparable to the aggregate reporter level and is considered good because the aggregate lending data suggest limitations on demand relative to the proportion of such families. Bank lending to moderate-income borrowers exceeds the percentage of moderate-income area families (17.5%) though it lags slightly the aggregate reporter level and is considered good. The bank's performance during 2008 is similar to 2009. Overall, this lending performance is considered good.

Distribution of Lending by Loan Amount and Size of Business

Raleigh-Durham-Cary, NC CSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	304	62.3	16,685	41.6	8,686	27.3	681,706	49.1
Over \$1 Million	177	36.3	23,402	58.3	NA	NA	NA	NA
Unknown	7	1.4	38	0.1	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	414	84.8	10,081	25.1	28,904	90.9	355,205	25.6
\$100,001-\$250,000	34	7.0	5,764	14.4	1,385	4.4	246,302	17.7
\$250,001-\$1 Million	40	8.2	24,280	60.5	1,496	4.7	786,139	56.7
Total	488	100.0	40,125	100.0	31,785	100.0	1,387,646	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 90.1% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending data indicates that the effective demand for credit for smaller businesses is much less. Excluding specialized credit card lenders, 67.3% of reported small business loans were to businesses having revenues of \$1 million or less. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. Compared to proxies for demand, and considering performance context, the bank’s level of lending is considered good. The bank’s performance during 2008 was substantially similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank originated six community development loans for \$7.2 million. Four of the loans were in conjunction with CICCAR; the other loans were for the benefit of affordable housing projects or provision of community development services. This represents a relatively high level of community development lending.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments which support community development initiatives that benefit multistate, statewide, and regional areas that include the bank’s operations within this market. The bank has a \$2.6 million investment in the CTC Limited Partnership affordable housing project within this CSA. Also, the bank’s investment in CAHEC helped to fund two projects within this assessment area. During the evaluation period, the bank also made \$144,600 in charitable donations to organizations that provide community development services.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 32 branch offices within this assessment area. Six of the branches (18.8%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 4.1% and 16.2% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank and its employees participate in a relatively high level of community development service initiatives. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Raleigh-Durham-Cary, NC CSA assessment area:

- DHIC (financial education for those seeking affordable housing)
- Habitat for Humanity (financial education)
- Guilford County Homeownership Center (financial education)
- Raleigh Regional Association of Realtors (financial education for those needing affordable housing)
- Midway Business Center (small business development)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN WILMINGTON, NORTH CAROLINA MSA

This assessment area includes the entire Wilmington MSA and has a population of approximately 275,000. The bank operates 11 branches within this market area. As of June 2009, RBC ranked 6th in deposit market share having 6.8% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with BB&TC, Wachovia Bank, NA., and First Citizens Bank and Trust Company accounting for a deposit market share of 50.4%. According to 2009 aggregate loan data, RBC ranked 15th in reported residential mortgage loans and 17th in reported small business loans. The aggregate data include 379 residential mortgage and 57 small business loan reporters. Both market share rankings consider originated and purchased loans.

For the assessment area, the median housing value as of 2000 was \$112,900, and the assessment area's owner-occupancy rate of 54.3% is lower than the state's rate of 61.6%. The MSA's family poverty rate of 8.9% is nearly equal to the overall state's rate of 9%. The 2008, 2009, and 2010 estimated median family incomes for the MSA were \$56,600, \$57,600, and \$59,200, respectively. The following table provides other relevant demographic data for the assessment area:

Assessment Area Demographics

Wilmington, NC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	4	8.3	2,193	2.9	781	35.6	15,495	20.4
Moderate	14	29.2	15,970	21.0	2,373	14.9	13,668	18.0
Middle	21	43.8	43,693	57.5	3,172	7.3	16,713	22.0
Upper	9	18.8	14,076	18.5	415	2.9	30,056	39.6
NA	0	0.0	0	0.0	0	0.0		
Total	48	100.0	75,932	100.0	6,741	8.9	75,932	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	1,364	1.7	3,854	3.4	1,448	37.6	26,903	23.4
Moderate	15,512	18.8	26,737	23.3	5,032	18.8	18,784	16.4
Middle	49,558	60.1	63,182	55.1	7,230	11.4	21,842	19.0
Upper	15,961	19.4	20,980	18.3	1,285	6.1	47,224	41.2
NA	0	0.0	0	0.0	0	0.0		
Total	82,395	100.0	114,753	100.0	14,995	13.1	114,753	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	598	2.9	541	2.9	33	3.5	24	2.8
Moderate	4,474	22.0	3,985	21.5	263	27.7	226	26.0
Middle	11,949	58.8	10,934	59.1	521	54.9	494	56.8
Upper	3,303	16.3	3,046	16.5	132	13.9	125	14.4
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	20,324	100.0	18,506	100.0	949	100.0	869	100.0
Percentage of Total Businesses:				91.1		4.7		4.3

*NA-Tracts without household or family income as applicable

Along with tourism, health care, education, and industrial production are key industries for the local economy. Major area employers are New Hanover Health Network, New Hanover County Schools, General Electric, the University of North Carolina Wilmington, and services provided by New Hanover County. As with many areas within the state and the nation, unemployment rates increased dramatically between 2008 and 2009; but, these rates have begun to decrease as the economy begins to recover from the recession. The following table provides unemployment rates for the prior three years:

	June 2008	June 2009	June 2010
Wilmington, NC MSA	5.4%	10.2%	9.8%
North Carolina	6.1%	11.2%	10.6%

The recession, and its corresponding effect on unemployment rates, has impacted credit demand within many markets, including this one.

A community contact was made within the market to discuss local economic conditions and community credit needs. The contact indicated that overall, local financial institutions are supportive of the local community. The contact expressed that the area could benefit from the addition of small business incubator programs to facilitate business development within the region.

Based upon a review of performance context information, local opportunities are reasonably available for community development loans and investments within the market area. RBC faces no significant constraints for taking advantage of available community development opportunities benefiting the assessment area or broader regional area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (4%) and dollar volume (4.8%), is slightly greater than the percentage of branch offices (2.5%) and deposits (2.2%) in the assessment area and is considered good. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Wilmington, NC MSA (2009)									
Income Categories	Bank				Aggregate				
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$	
	(106)				Home Purchase				(6,397)
Low	2	1.9	154	0.7	77	1.2	9,409	0.7	
Moderate	28	26.4	4,336	18.6	1,174	18.4	191,721	14.9	
	(340)				Refinance				(16,196)
Low	0	0.0	0	0.0	115	0.7	17,124	0.5	
Moderate	41	12.1	7,613	10.0	1,986	12.3	338,005	9.9	
	(7)				Home Improvement				(417)
Low	0	0.0	0	0.0	3	0.7	314	0.6	
Moderate	1	14.3	155	22.5	56	13.4	4,521	8.6	
	(0)				Multi-Family				(9)
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	5	55.6	3,769	67.5	
	HMDA Totals								
Low	2	0.4	154	0.2	195	0.8	26,847	0.6	
Moderate	70	15.5	12,104	12.1	3,221	14.0	538,016	11.3	
Middle	275	60.7	59,791	59.6	14,743	64.0	2,946,488	61.8	
Upper	106	23.4	28,336	28.2	4,860	21.1	1,256,887	26.4	
NA*	0	0.0	0	0.0	0	0.0	0	0.0	
Total	453	100.0	100,385	100.0	23,019	100.0	4,768,238	100.0	

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

In 2009, refinance transactions, for both the bank and aggregate lenders, represented approximately three times the volume of the next largest HMDA product, home purchase loans. As such, the bank's performance for refinance loans is given significantly greater weight in the assessment of the bank's HMDA performance. Home improvement and multi-family lending volume was nominal. The bank's percentage of refinance lending in moderate-income tracts is nearly identical to the aggregate lending level. Demand in low-income tracts is modest based upon aggregate lending activity and RBC had no refinance loans within such tracts. Nonetheless, the bank's 2009 refinance lending is considered good. The bank's home purchase lending is considered excellent within both low- and moderate-income tracts when compared to aggregate lending.

Within the market, 1.7% and 18.8% of owner-occupied housing units are located in low- and moderate-income tracts respectively. As presented in the preceding table, the bank's lending in low-income tracts is less than both the aggregate lending level and the demographic proxy and is considered somewhat poor. Conversely, within moderate-income tracts, which evidence much greater credit demand, based on both aggregate and demographic proxies, the bank's performance slightly exceeds the aggregate lending level and is comparable to the demographic demand proxy, and overall is considered good. Given the greater demand within moderate-income tracts, overall, the bank's 2009 performance is considered good.

The bank's HMDA lending performance was stronger during 2008. According to RBC's 2008 data, 1.1% of loans were extended in low-income census tracts compared with an aggregate lending level of 1.3%. In moderate-income tracts, RBC originated 22.8% of its HMDA loans while the aggregate lending level equaled 17%. RBC's 2008 performance is considered excellent.

When arriving at an overall HMDA rating, greater weight is given to the bank's 2009 performance as a larger dollar volume (\$100.4 million) of loans was originated than in 2008 (\$67.7 million). Overall, RBC's HMDA performance is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Wilmington, NC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	1	1.0	40	0.4	276	2.7	9,844	2.3
Moderate	25	24.0	2,258	25.2	2,051	20.3	113,019	26.8
Middle	56	53.8	3,111	34.7	5,719	56.5	198,943	47.3
Upper	22	21.2	3,559	39.7	2,068	20.4	99,237	23.6
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	104	100.0	8,968	100.0	10,114	100.0	421,043	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 2.9% and 22% of all area businesses are located in low- and moderate-income census tracts, respectively. As reflected in the preceding table, the bank's lending in low-income tracts lags that of the market aggregate and of the D&B data, both proxies for demand. Conversely, its performance in moderate-income tracts exceeds both lending demand proxies. Overall, given the greater lending opportunities available in moderate-income areas and the bank's strong performance, RBC's geographic distribution in 2009 is considered good. RBC's 2008 performance was better when 2.2% and 28.1%, respectively, of the bank's small business lending were in low- and moderate-income census tracts which exceeded aggregate lending levels. The dollar volume of loans was significantly higher in 2008 (approximately \$27 million) than 2009 (approximately \$9 million), and as such, overall, the penetration of low- and moderate-income areas reflects an excellent distribution of small business loans.

When determining an overall geographic loan distribution rating, greater weight within the market was given to the bank's HMDA lending performance as a significantly greater dollar volume of such loans was originated during the review period. Overall, the geographic loan distribution within this assessment area is considered good given the institution's size, branch locations, effective demand for credit, and lending performance for both HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Wilmington, NC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(103)				(5,427)			
Low	3	2.9	192	0.8	196	3.6	18,034	1.6
Moderate	37	35.9	4,857	21.3	1,076	19.8	145,211	12.9
	(334)				(13,810)			
	Home Purchase				Refinance			
Low	9	2.7	907	1.2	516	3.7	57,539	2.0
Moderate	57	17.1	7,466	9.9	2,092	15.1	283,662	9.6
	(7)				(399)			
	Home Improvement				Multi-Family			
Low	1	14.3	10	1.5	33	8.3	1,242	2.5
Moderate	1	14.3	60	8.7	84	21.1	6,007	12.1
	(0)				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	13	2.9	1,109	1.1	745	3.8	76,815	1.9
Moderate	95	21.4	12,383	12.5	3,252	16.6	434,880	10.6
Middle	77	17.3	11,654	11.8	4,426	22.5	729,704	17.7
Upper	259	58.3	73,723	74.6	11,213	57.1	2,876,739	69.9
Total	444	100.0	98,869	100.0	19,636	100.0	4,118,138	100.0
Unknown	9		1,516		3,383		650,100	

() represents the total number of bank loans for the specific Loan Purpose where income is known
Percentage's (%) are calculated on all loans where incomes are known

As previously mentioned, refinance transactions received greater weight in the overall assessment of the bank's lending performance. The preceding table reflects adequate lending to low-income borrowers in the case of refinancings, but better performance when lending to low-income borrowers purchasing homes. For moderate-income borrowers, RBC's lending is good for refinance loans, and an excellent level for home purchase loans.

When considering the bank's performance of all HMDA loan types, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (20.4%) but is generally consistent with the aggregate reporter level of lending and is considered adequate. Bank lending to moderate-income borrowers exceeds the percentage of moderate-income area families (18%) and the aggregate percentage of lending to such borrowers and is considered excellent. The bank's performance during 2009 is considered good, and given that its performance during 2008 is substantially similar, overall, the bank's lending performance is considered good.

Distribution of Lending by Loan Amount and Size of Business

Wilmington, NC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	75	72.1	4,956	55.3	2,926	28.6	235,212	55.7
Over \$1 Million	27	26.0	3,990	44.5	NA	NA	NA	NA
Unknown	2	1.9	22	0.2	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	87	83.7	2,079	23.2	9,338	91.4	121,088	28.7
\$100,001-\$250,000	9	8.7	1,478	16.5	453	4.4	78,667	18.6
\$250,001-\$1 Million	8	7.7	5,411	60.3	428	4.2	222,495	52.7
Total	104	100.0	8,968	100.0	10,219	100.0	422,250	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 28.6% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 91.1% of all businesses have revenues that do not exceed \$1 million per year. According to the 2009 data, 75.6% of reported small business loans, after excluding credit card lenders, were to businesses having revenues of \$1 million or less. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. During the evaluation period, 72.1% of the bank’s small business loans were to businesses with annual revenues of \$1 million or less. This level of lending is considered good and its performance during 2008 is substantially similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans and cannot also be reported as community development loans. The absence of such loans in this particular assessment area, however, does not warrant a lower overall lending performance assessment in light of the volume and distribution of other types of lending.

INVESTMENT TEST

Performance in this market is considered adequate when considering the bank’s qualified investments which support community development initiatives that benefit multistate, statewide, and regional areas including this MSA. In fact, three of the CAHEC funds in which the bank invested were for three projects within this assessment area. During the review period, the bank also donated \$5,000 in qualified donations in this market.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 11 branch offices within this assessment area. Three of the branches (27.3%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 2.9% and 21% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank and its employees participate in a relatively high level of community development service initiatives. Community development activities specific to this assessment area include the following:

- A bank employee assists the board of directors of a local food bank with grant proposals.
- A bank employee offered financial assistance and outreach to the North Carolina Community Development Corporation.
- A bank employee assisted an organization whose mission is to revitalize downtown areas of Wilmington, NC.
- A bank employee has provided financial literacy working with a local community organization that provides affordable housing.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GREENSBORO-WINSTON SALEM-HIGH POINT, NORTH CAROLINA CSA

This assessment area includes the Burlington, North Carolina MSA and portions of both the Greensboro-High Point and Winston-Salem North Carolina MSAs. The market has a population of 988,369. The bank operates 17 branches within this market area. As of June 2009, RBC ranked 9th in deposit market share having 2% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with BB&TC, Wachovia Bank NA., and SunTrust Bank accounting for a deposit market share of 69.6%. According to 2009 aggregate loan data, RBC ranked 27th in reported residential mortgage loans and 21st in reported small business loans. The aggregate data include 438 residential mortgage loan and 75 small business loan reporters. Both market share rankings consider originated and purchased loans.

The assessment area median housing value as of 2000 was \$103,927, and the owner-occupancy rate of 61.9% is nearly identical to the overall state rate of 61.6%. The area's family poverty rate of 7.6% is lower than overall state's rate of 9%. The 2008, 2009, and 2010 estimated median family incomes for the Burlington MSA were \$51,400, \$54,700, and \$53,800, respectively. The 2008, 2009, and 2010 estimated median family incomes for the Greensboro-High Point MSA were \$56,100, \$58,500, \$58,000, respectively. The 2008, 2009, and 2010 estimated median family incomes for the Winston-Salem MSA were \$57,300, \$59,700, and \$59,800, respectively.

The following table includes additional pertinent demographic data for the market area:

Assessment Area Demographics

Greensboro-Winston Salem-High Point, NC CSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	12	5.5	9,412	3.5	3,378	35.9	49,248	18.5
Moderate	45	20.5	37,938	14.3	5,963	15.7	46,591	17.5
Middle	106	48.2	140,219	52.7	8,939	6.4	61,100	23.0
Upper	57	25.9	78,509	29.5	1,953	2.5	109,139	41.0
NA	0	0.0	0	0.0	0	0.0		
Total	220	100.0	266,078	100.0	20,233	7.6	266,078	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	3,799	1.5	14,317	3.6	5,554	38.8	85,236	21.6
Moderate	28,904	11.0	60,780	15.4	11,285	18.6	66,174	16.7
Middle	143,562	54.8	206,870	52.4	19,096	9.2	78,089	19.8
Upper	85,656	32.7	113,125	28.6	5,572	4.9	165,593	41.9
NA	0	0.0	0	0.0	0	0.0		
Total	261,921	100.0	395,092	100.0	41,507	10.5	395,092	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	1,282	2.4	1,127	2.4	93	2.9	62	2.4
Moderate	7,710	14.4	6,646	14.0	641	19.9	423	16.3
Middle	27,894	52.2	24,756	52.0	1,708	53.1	1,430	55.1
Upper	16,548	31.0	15,093	31.7	774	24.1	681	26.2
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	53,434	100.0	47,622	100.0	3,216	100.0	2,596	100.0
Percentage of Total Businesses:				89.1		6.0		4.9

*NA-Tracts without household or family income as applicable

Local industries providing employment opportunities include healthcare, food and accommodations, as well as education. Major area employers are Wake Forest University Baptist Medical Center, Novant Health, Wal-Mart, and National Textiles. The following table provides unemployment rates as of June for each of the prior three years:

	June 2008	June 2009	June 2010
Greensboro-Winston Salem-High Point, NC CSA	6.2%	11.7%	10.7%
North Carolina	6.1%	11.2%	10.6%

As reflected in the preceding table, unemployment rates rose sharply during the previous three years and have begun to decline, showing some signs of improvement. The area's economy continues to rely more on a services rather than manufacturing and although the rate of unemployment is moderating somewhat, local economic activity remains depressed.

A community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact indicated that while local financial institutions are generally supportive of the local community, there remains room for more programs directed at microenterprise development. The contact expressed the opinion that during the economic recession financing for start-up businesses in particular has become more difficult to obtain.

Based upon performance context information, local opportunities are reasonably available for community development loans and investments within the market area, and the bank faces no constraints in helping to meet community development needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (3.9%) and dollar volume (3.4%), is consistent with the percentage of branch offices (3.9%) and deposits (3.4%) in the assessment area and is considered good. During the review period, one small farm loan totaling \$10,000 was originated within this assessment area. This loan is not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Greensboro-Winston Salem-High Point, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(69) Home Purchase				(15,056)			
Low	1	1.4	131	1.1	141	0.9	12,759	0.6
Moderate	6	8.7	949	8.3	1,319	8.8	136,373	6.2
	(225) Refinance				(29,284)			
Low	0	0.0	0	0.0	167	0.6	16,557	0.3
Moderate	13	5.8	1,431	3.7	1,636	5.6	187,135	3.8
	(5) Home Improvement				(808)			
Low	0	0.0	0	0.0	11	1.4	470	0.7
Moderate	0	0.0	0	0.0	78	9.7	3,631	5.4
	(1) Multi-Family				(64)			
Low	0	0.0	0	0.0	1	1.6	1,165	1.0
Moderate	1	100.0	200	100.0	20	31.3	11,294	10.2
	HMDA Totals							
Low	1	0.3	131	0.3	320	0.7	30,951	0.4
Moderate	20	6.7	2,580	5.1	3,053	6.8	338,433	4.6
Middle	154	51.3	22,282	44.0	21,787	48.2	3,047,198	41.8
Upper	125	41.7	25,694	50.7	20,052	44.4	3,871,935	53.1
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	300	100.0	50,687	100.0	45,212	100.0	7,288,517	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

As is the case in other market areas previously discussed, refinance transactions represent the primary HMDA product for both the bank and all lenders in the assessment area. Home purchase lending similarly ranked second, while home improvement and multi-family lending accounts for very little volume within the market. As such, the bank's performance for refinances carries significantly more weight in rating RBC's overall performance. As reflected in the preceding table, the bank's percentage of lending in moderate income tracts for both refinance and purchase lending is nearly identical to that of all lenders and is considered good. Within low-income tracts, the bank's performance is mixed with excellent performance for home purchase loans, but an absence of any refinance loans. Regardless, effective demand in such tracts is very limited as suggested by the aggregate data.

Within the market, 1.5% and 11% of owner-occupied housing is located in low- and moderate-income tracts, respectively. While inconsistent with these figures, the bank's overall performance compares more favorably to aggregate lending. For moderate-income tracts, by number of loans, the percentage made by the bank is nearly identical to the 2009 aggregate lending level; however, its lending in low-income tracts is less than the aggregate lending level. Given the greater demand from moderate-income tracts, more weight is given to the bank's performance in those tracts and is considered good overall. This performance level is substantially similar to the bank's 2008 lending performance, and is considered good overall.

Distribution of Small Business Loans by Income Level of Census Tract

Greensboro-Winston Salem-High Point, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	4	2.2	1,312	8.9	520	2.2	24,061	2.2
Moderate	20	11.0	2,265	15.3	3,246	13.5	156,888	14.6
Middle	104	57.5	8,478	57.4	12,530	52.1	562,200	52.4
Upper	53	29.3	2,725	18.4	7,773	32.3	329,225	30.7
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	181	100.0	14,780	100.0	24,069	100.0	1,072,374	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 2.4% and 14.4% of all area businesses are located in low- and moderate-income census tracts, respectively. For 2009, bank lending to businesses in both low- and moderate-income tracts was comparable to both the D&B and 2009 aggregate lending demand proxies. The bank's 2008 performance was substantially similar, and also considered good.

The overall geographic loan distribution within this assessment area is considered good given the institution's size, branch locations, effective demand for credit, and lending performance levels of the bank's HMDA, and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Greensboro-Winston Salem-High Point, NC CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(69)				Home Purchase (13,083)			
Low	9	13.0	824	7.2	1,460	11.2	122,395	6.3
Moderate	21	30.4	2,179	19.1	3,885	29.7	442,240	22.8
	(222)				Refinance (22,721)			
Low	13	5.9	1,002	2.6	1,388	6.1	121,765	3.1
Moderate	34	15.3	3,467	9.1	3,701	16.3	413,028	10.6
	(5)				Home Improvement (769)			
Low	0	0.0	0	0.0	84	10.9	2,902	4.6
Moderate	0	0.0	0	0.0	162	21.1	8,180	13.0
	(0)				Multi-Family (0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	22	7.4	1,826	3.7	2,932	8.0	247,062	4.2
Moderate	55	18.6	5,646	11.3	7,748	21.2	863,448	14.6
Middle	62	20.9	8,044	16.1	8,957	24.5	1,226,036	20.8
Upper	157	53.0	34,452	68.9	16,936	46.3	3,560,915	60.4
Total	296	100.0	49,968	100.0	36,573	100.0	5,897,461	100.0
Unknown	4		719		8,639		1,391,056	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

The bank's lending is consistent with aggregate lending in the case of refinance and home purchase lending to both low- and moderate-income borrowers. Within the assessment area, demographic data from the 2000 census indicates that 18.5% and 17.5% of families are low- and moderate-income, respectively, but the aggregate data suggests, in case of low-income borrowers especially, that the demographic proxy overstates effective demand.

Overall, RBC's lending to low-income borrowers is less than the percentage of low-income families in the market but consistent with the percentage of 2009 aggregate lending to such borrowers. On the other hand, RBC's lending to moderate-income borrowers is comparable to both of these demand proxies. This level of lending is considered good, while the bank's 2008 performance is stronger and considered excellent. During 2008, the bank extended 9.5% and 27.2% of HMDA loans to low- and moderate-income borrowers, respectively, exceeding aggregate lending of 7.3% to low-income and 22.2% to moderate-income borrowers. Within this market, the bank's 2009 performance receives greater weight as the bank originated approximately \$50.1 million in HMDA loans in 2009 compared with approximately \$36.9 million in 2008. Overall, RBC's HMDA lending to borrowers of different income levels is considered good.

Distribution of Lending by Loan Amount and Size of Business

Greensboro-Winston Salem-High Point, NC CSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	102	56.4	6,714	45.4	5,756	23.6	499,718	46.4
Over \$1 Million	79	43.6	8,066	54.6	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	151	83.4	4,051	27.4	22,167	90.7	270,573	25.1
\$100,001-\$250,000	15	8.3	2,785	18.8	1,126	4.6	196,996	18.3
\$250,001-\$1 Million	15	8.3	7,944	53.7	1,146	4.7	610,253	56.6
Total	181	100.0	14,780	100.0	24,439	100.0	1,077,822	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicated that 89.1% of all local businesses have revenues that do not exceed \$1 million per year. According to 2009 aggregate small business data, 23.6% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Excluding large credit card lenders, the remaining group of traditional lenders made 67.6% of reported small business loans to businesses having revenues of \$1 million or less. During 2009, 56.4% of the bank's small business loans were to businesses with annual revenues of \$1 million or less. This lending level is considered good performance, and RBC's performance during 2008 was substantially similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank originated four community development loans totaling \$23.6 million benefiting this assessment area. These loans facilitated affordable housing projects within the area. This is a relatively high level of community development lending.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments, which support community development initiatives that benefit multistate, statewide, and regional areas including this MSA. Included in these investments is RBC's Apollo National Fund 9 which has funded \$5.7 million to projects located within this assessment area. Additionally, RBC's CAHEC investment has funded six projects located within this assessment area. The bank has also donated \$16,000 to organizations whose primary purposes are micro-enterprise development and affordable housing for needy individuals.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered adequate. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 17 branch offices within this assessment area. 2000 census data indicates that 3.5% and 14.3% of the assessment area's families reside in low- and moderate-income areas, respectively. Although there are no branch locations in low- or moderate-income census tracts, branch locations and business hours are nonetheless considered convenient and within sufficient proximity to these areas as to be considered adequate to meet the needs of all segments of the assessment area.

Community Development Services:

The bank and its employees participated in a high level of community service initiatives. Within this area, employees have served on workshops promoting home ownership in this market, as well as employees offering their time and financial expertise to organizations and schools systems in need of financial education.

During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Greensboro-Winston Salem-High Point, NC MSA assessment area:

- Center for Home Ownership (financial education for those in need of affordable housing)
- Housing Authority of Winston Salem (financial education)
- North Carolina Affordable Housing Conference (affordable housing)
- Guilford County Homeownership Center (financial education)
- Joseph's House (financial education for those transitioning from foster care)
- Unity Builders (small business development)
- NCATSU Foundation (small business development)
- Guilford Education Allowance (financial education)
- Guilford County Fatherhood Coalition (financial education)
- NC Affordable Housing Conference (affordable housing)

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF NORTH CAROLINA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. With the exception of the lending test rating in the Hickory-Lenoir-Morganton MSA market, the bank’s performance in all markets for each test is consistent with or exceeds the statewide rating.

Assessment Area	Lending Test	Investment Test	Service Test
Asheville MSA	Consistent	Consistent	Consistent
Fayetteville MSA	Exceeds	Consistent	Consistent
Goldsboro MSA	Consistent	Consistent	Consistent
Greenville MSA	Consistent	Consistent	Consistent
Hickory-Lenoir-Morganton MSA	Below	Consistent	Consistent
Jacksonville MSA	Exceeds	Consistent	Consistent
Rocky Mount MSA	Consistent	Consistent	Consistent

NONMETROPOLITAN STATEWIDE AREA

(If some or all of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CARTERET, NORTH CAROLINA ASSESSMENT AREA

The Carteret assessment area includes all of each of the following counties in northeastern North Carolina:

Carteret	Columbus	Craven	Duplin
Harnett	Lee	Lenoir	Moore
Richmond	Robeson	Sampson	Scotland

According to 2000 census data, the assessment area has a population of 795,175. The bank operates 21 branches within this market area. As of June 2009, RBC ranked 5th in deposit market share having 8.4% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with BB&TC, First Bank, and First Citizens Bank and Trust Company accounting for a deposit market share of 56.5%. According to 2009 aggregate loan data, RBC ranked 12th in reported residential mortgage loans and 18th in reported small business loans. The aggregate data include 390 residential mortgage and 66 small business loan reporters. Both market share rankings consider originated and purchased loans.

The assessment area median housing value is \$73,970. The assessment area's owner-occupancy rate of 62.4% is similar to the overall state rate of 61.6% and the nonmetropolitan areas of North Carolina (62.7%). The family poverty rate of the assessment area (13.2%) exceeds the statewide nonmetropolitan area rate (11.3%) as well as the state (9%). The North Carolina statewide nonmetropolitan median family incomes during 2008, 2009, and 2010 equaled \$48,100, \$49,900, and \$50,400, respectively.

The following table includes additional pertinent demographic data for the market area:

Assessment Area Demographics

Carteret, NC NonMSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	2.1	2,545	1.2	1,270	49.9	48,940	22.4
Moderate	34	24.3	43,235	19.8	8,915	20.6	38,246	17.5
Middle	81	57.9	132,704	60.8	16,247	12.2	47,236	21.6
Upper	22	15.7	39,757	18.2	2,288	5.8	83,819	38.4
NA	0	0.0	0	0.0	0	0.0		
Total	140	100.0	218,241	100.0	28,720	13.2	218,241	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	1,555	0.7	3,941	1.3	1,858	47.1	76,500	25.2
Moderate	38,528	17.5	61,567	20.3	15,714	25.5	47,860	15.8
Middle	136,624	62.2	183,336	60.4	29,346	16.0	55,559	18.3
Upper	43,021	19.6	54,851	18.1	4,567	8.3	123,776	40.8
NA	0	0.0	0	0.0	0	0.0		
Total	219,728	100.0	303,695	100.0	51,485	17.0	303,695	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	315	0.9	278	0.8	17	1.1	20	1.2
Moderate	7,260	20.0	6,513	19.7	353	21.9	394	23.4
Middle	20,900	57.6	19,128	58.0	855	53.0	917	54.4
Upper	7,810	21.5	7,067	21.4	387	24.0	356	21.1
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	36,285	100.0	32,986	100.0	1,612	100.0	1,687	100.0
Percentage of Total Businesses:				90.9		4.4		4.6

*NA-Tracts without household or family income as applicable

Major area employers include county school districts and local governments as well as several manufacturing companies such as International Paper Company, American Cyanamid Company, Perdue Products Incorporated, and West Point Home Incorporated. The following table provides unemployment rates as of June for each of the prior three years:

	June 2008	June 2009	June 2010
Carteret	4.7%	7.7%	7.5%
Columbus	7.5%	12.5%	11.9%
Craven	5.7%	10.2%	9.8%
Duplin	5.4%	9.2%	8.6%
Harnett	6.7%	11.7%	10.8%
Lee	7.1%	14.3%	12.5%
Lenoir	7.2%	11.9%	10.7%
Moore	6.2%	10.1%	9.1%
Richmond	8.9%	13.4%	13%
Robeson	7.9%	11.9%	12.2%
Sampson	5.1%	8.5%	8.5%
Scotland	10.6%	16.8%	16.4%
North Carolina	6.1%	11.2%	10.6%

Contact was made with an area official knowledgeable of economic conditions within the market area. The contact indicated that though the area’s population has grown significantly during the prior decade, the job market has not kept pace, especially given the recent economic recession. The contact expressed the view that greater access to business financing could help improve the area’s job market. Despite the region’s economic challenges, the contact indicated that local financial institutions are generally supportive of the local community.

A review of performance context information indicates that local opportunities are limited for community development loans and investments within the market area. Nonetheless, RBC faces no constraints in helping to meet community development opportunities that may be available, especially in the broader regional or statewide area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution’s overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank’s market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (5.7%) and dollar volume (5.2%), slightly exceeds both the percentage of branch offices (4.8%) and deposits (4.5%) in the assessment area and is considered good. During the review period, 16 small farm loans totaling \$1.6 million were extended during the review period within this assessment area. These loans are not included in the following analysis because of the severely limited volume present.

The following tables present data about the bank’s 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Carteret, NC NonMSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(174)				Home Purchase (9,258)			
Low	0	0.0	0	0.0	7	0.1	298	0.0
Moderate	14	8.0	1,766	6.0	629	6.8	66,493	4.4
	(465)				Refinance (18,063)			
Low	0	0.0	0	0.0	8	0.0	675	0.0
Moderate	43	9.2	5,407	6.8	1,420	7.9	171,162	5.6
	(14)				Home Improvement (949)			
Low	0	0.0	0	0.0	2	0.2	31	0.0
Moderate	1	7.1	35	2.8	158	16.6	6,353	8.6
	(0)				Multi-Family (19)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	3	15.8	2,990	21.6
	HMDA Totals							
Low	0	0.0	0	0.0	17	0.1	1,004	0.0
Moderate	58	8.9	7,208	6.6	2,210	7.8	246,998	5.3
Middle	306	46.9	50,193	45.8	16,746	59.2	2,582,141	55.8
Upper	289	44.3	52,134	47.6	9,316	32.9	1,796,693	38.8
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	653	100.0	109,535	100.0	28,289	100.0	4,626,836	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market area, there are only three low-income census tracts containing just .7% of assessment area owner-occupied housing units; therefore the lack of lending in such tracts is not inconsistent with these facts. Potential demand is greater in the 34 moderate-income tracts that contain 17.5% of the owner-occupied housing units. The bank's performance for both refinance and home purchase lending is considered good when compared with the aggregate lending levels within moderate-income census tracts. Home improvement and multi-family lending by the bank and all lenders in the market is nominal.

As reflected in the preceding table, and considering only loans in moderate-income tracts, the bank's overall lending performance slightly exceeds the aggregate lending performance and is considered good. RBC's 2009 performance level is substantially similar to its 2008 performance level, and overall is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Carteret, NC NonMSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	0	0.0	0	0.0	80	0.5	2,306	0.3
Moderate	25	15.5	1,901	19.5	3,022	17.3	117,246	16.7
Middle	95	59.0	5,209	53.4	10,142	58.1	377,615	53.6
Upper	41	25.5	2,636	27.0	4,206	24.1	206,822	29.4
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	161	100.0	9,746	100.0	17,450	100.0	703,989	100.0

*NA-Tracts without household or family income as applicable

RBC originated no loans in low-income census tracts; however, in aggregate only .5% of lending was in such tracts while the percentage of business located in low-income census tracts equals .9%. The bank's small business lending in moderate-income census tracts (15.5%) is comparable to both the percentage of businesses located in such areas (20%) and the percentage of aggregate loans reported in such tracts. The bank's performance during 2009 is considered good and is reflective of a greater opportunity and demand in moderate-income tracts.

The bank's performance during 2008 was stronger than its 2009 performance, as the bank originated 20.9% of its small business loans within moderate-income tracts compared with an aggregate lending level of 16.9%. For 2008, both RBC and aggregate lending levels in low-income tracts was comparable to 2009. When determining an overall rating, greater weight was given to the bank's lending in 2008 as it originated \$23 million in small business lending compared with only \$9.7 million in 2008. Overall, the bank's small business performance is considered excellent.

The overall geographic loan distribution within this assessment area is considered good, driven largely by its HMDA lending performance because of the significantly larger dollar volume of such lending in the market, and considering the institution's size, branch locations, and effective demand for credit.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Carteret, NC NonMSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(171)				(7,524)			
Low	10	5.8	735	2.6	282	3.7	18,715	1.5
Moderate	38	22.2	3,638	12.7	1,175	15.6	115,826	9.4
	(455)				(13,913)			
	Refinance							
Low	12	2.6	1,004	1.3	493	3.5	44,247	1.9
Moderate	49	10.8	4,616	6.0	1,522	10.9	149,935	6.4
	(13)				(903)			
	Home Improvement							
Low	2	15.4	72	5.8	85	9.4	2,506	3.6
Moderate	2	15.4	213	17.2	152	16.8	6,791	9.7
	(0)				(0)			
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	24	3.8	1,811	1.7	860	3.8	65,468	1.8
Moderate	89	13.9	8,467	7.9	2,849	12.8	272,552	7.5
Middle	126	19.7	15,738	14.7	5,384	24.1	688,414	19.0
Upper	400	62.6	80,923	75.7	13,247	59.3	2,604,198	71.7
Total	639	100.0	106,939	100.0	22,340	100.0	3,630,632	100.0
Unknown	14		2,596		5,949		996,204	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

Consistent with the relative volume of lending, greatest weight is accorded refinance lending followed by home purchase lending is the second largest product, and greater weight is associated with its refinance performance. As reflected in the preceding table, the bank's home purchase lending is considered excellent when compared with aggregate lending performance for both low- and moderate-income borrowers. Its refinance performance is considered adequate to low-income borrowers and good for moderate-income borrowers. Though excellent, home improvement lending does not impact the bank's overall performance in light of the nominal lending volume.

Overall, as reflected in the preceding table, though RBC's lending to low-income borrowers is less than the percentage of low-income families in the market (22.4%), it is identical to the 2009 percentage of aggregate lending to low-income borrowers. Similarly, RBC's lending to moderate-income borrowers is lower than the percentage of moderate-income families in the market (17.5%) but slightly exceeds the aggregate lending level. This level of lending is substantially similar to its 2008 performance, and is considered good.

Distribution of Lending by Loan Amount and Size of Business

Carteret, NC NonMSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	112	69.6	5,874	60.3	5,723	32.1	424,038	59.8
Over \$1 Million	48	29.8	3,871	39.7	NA	NA	NA	NA
Unknown	1	0.6	1	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	136	84.5	3,337	34.2	16,326	91.7	229,241	32.3
\$100,001-\$250,000	17	10.6	2,960	30.4	811	4.6	142,748	20.1
\$250,001-\$1 Million	8	5.0	3,449	35.4	670	3.8	336,830	47.5
Total	161	100.0	9,746	100.0	17,807	100.0	708,819	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 90.9% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending indicates that the effective demand for credit for smaller businesses is less. After excluding large credit card lenders, 2009 data shows that 78.3% of reported small business loans were to businesses having revenues of \$1 million or less. Compared to the proxies for demand, and considering contextual factors, the bank’s level of lending is considered good. RBC’s performance during 2008 was slightly stronger, but also considered good with 76.5% of its small business loans being originated to businesses with annual revenues of \$1 million or less.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans and cannot also be reported as community development loans. The absence of such loans in this particular assessment area, however, does not warrant a lower overall lending test performance assessment in light of the volume and distribution of other types of lending.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments which support community development initiatives that benefit multistate, statewide, and regional areas that include the bank’s assessment areas, and such investments extend to the Carteret assessment area. Five projects funded by the bank’s investment in CAHEC are located within this assessment area. A project funded for \$1.25 million by the bank’s investment in Apollo National Fund 9 is located within this assessment area.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered good. Systems for delivering retail banking are accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 21 branch offices within this assessment area. Five of the branches (23.8%) are located in moderate-income areas. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering 2000 census data that indicates that 1.2% and 19.8% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Carteret, NC NonMSA assessment area:

- Coalition of Families for Lee County (community service)
- Dream Center (community service)
- Ellerbe Development Foundation (affordable housing)
- Hamlet Business Development Association (small business development)
- Local school systems (financial education benefiting schools with a high low- and moderate-income enrollment)

NONMETROPOLITAN STATEWIDE AREAS

(If none of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN AREAS OF NORTH CAROLINA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. In the cases where the performance was considered below, the performance was nonetheless adequate for the assessment area.

Assessment Area	Lending Test	Investment Test	Service Test
Avery	Consistent	Consistent	Consistent
Bertie	Exceeds	Consistent	Consistent
Cherokee	Below	Consistent	Consistent
Cleveland	Exceeds	Consistent	Consistent
Dare	Consistent	Consistent	Consistent
Granville	Below	Consistent	Consistent
Iredell	Exceeds	Consistent	Consistent
Surry	Consistent	Consistent	Consistent
Wilson	Consistent	Consistent	Consistent

STATE

CRA RATING FOR Alabama³:

The lending test is rated: High Satisfactory
The investment test is rated: Low Satisfactory
The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- The borrower distribution is considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- While varying by product, the geographic distribution is considered adequate overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- An adequate level of community development loans has been extended to assist affordable housing, economic development projects, and other community needs.
- The bank maintains an adequate level of qualified investments that benefit statewide and regional areas.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A relatively high level of participation in qualified community development services that generally benefit affordable housing and micro-enterprise development was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are nine assessment areas within the State of Alabama. The composition of each of these assessment areas is contained in **APPENDIX E** of this evaluation.

On a combined basis, the nine statewide assessment areas account for 22.5%, 18.4%, and 20.1% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the State of Alabama was evaluated by reviewing the Huntsville-Decatur CSA, and the Birmingham-Hoover MSA using full scope interagency examination procedures. In arriving at an overall state rating, individual assessment area performance was generally weighted by the dollar volume of lending. Therefore, the greatest weight was given to the performance of the Huntsville-Decatur CSA assessment area. For assessment areas subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

The institution has 80 branch offices located throughout the State of Alabama and ranks 5th in deposit market share having 6.4% of the state's available FDIC insured deposits within the combined portions of the state the bank has branches (credit union deposits are not included). Six (7.5%) offices are located in low-income tracts and nine (11.3%) are located in moderate-income tracts. The bank holds approximately \$3.7 billion in deposits within the statewide area.

Based on 2000 census data, the assessment areas have a total population of approximately 2.7 million, including 723,152 families. A majority of the families are middle- and upper-income (62.6%), while low- and moderate-income families comprise 21% and 16.4% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 62.7%, and 11.5% of families live below the poverty level. The 2008, 2009, and 2010 median family incomes for MSAs and statewide nonmetropolitan areas are referenced in their respective market evaluations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Overall, lending activity is considered good and consistent with the bank's capacity. According to 2009 market share data, the bank ranks 19th and 12th in small business/farm and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's distribution of lending is considered good. Lending performance varies by both product and market. When reaching overall conclusions, HMDA lending performance received the most weight as the category typically accounted for significantly greater volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank extended an adequate level of lending by dollar volume that qualifies as community development loans. During the evaluation period, RBC funded 17 qualified community development loans totaling \$2.8 million in its markets in Alabama. The loans facilitated affordable housing projects and provided low and moderate-income services within the state. All loans originated in this state are discussed in their respective assessment area evaluation. Additionally the bank funded one community development loan in Alabama, outside of any of its markets, which totaled \$20,000.

INVESTMENT TEST

The institution's level of qualified investments benefiting Alabama is rated low satisfactory when considering investments that benefit specific assessment areas as well as those that benefit the broader regional and statewide area. As previously mentioned, the bank has funded \$36.4 million of a \$37.5 million commitment in CAHEC, an organization that utilizes tax credits to fund affordable housing projects for underserved communities within a multistate region that includes Alabama; however, the

funds in which the bank has invested do not have any projects directly benefiting the bank's geographic footprint in Alabama. A significant qualified investment was made that benefits Mobile, Alabama, however that market was not subject to a full scope review. Accordingly, the rating is based primarily on the regional investment the benefits of which are dispersed across a large geographic area. During the evaluation period, investments also include donations that target specific markets within Alabama and these are discussed in the evaluation of these respective markets.

SERVICE TEST

The statewide rating for the institution under the service test is high satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the Alabama markets are representative of those offered by the institution overall. Community development services are discussed in markets analyses that follow.

METROPOLITAN AREAS

*(For metropolitan areas with some or all assessment areas
reviewed using full-scope review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN HUNTSVILLE-DECATUR,
ALABAMA CSA**

This assessment area includes the Huntsville-Decatur, AL CSA and has a population of 453,440 according to 2000 census data. The bank operates 16 branches within this market area. As of June 2009, RBC ranked 4th in deposit market share having 9.4% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Regions Bank, Compass Bank, and Wachovia Bank, NA., accounting for a deposit market share of 53.5%. According to 2009 aggregate loan data, RBC ranked 11th in reported residential mortgage loans and 17th in reported small business loans. The aggregate data include 321 residential mortgage loan and 61 small business loan reporters. Both market share rankings consider originated and purchased loans.

Census data for 2000 shows an assessment area median housing value of \$91,977. The assessment area's owner-occupancy rate of 65.7% is comparable to the state's rate of 64.1%. The area's family poverty rate of 8.7% is less than the rate for the state (12.5%). The 2008, 2009, and 2010 estimated median family incomes for the Huntsville MSA were \$64,500, \$67,500, and \$68,000, respectively. The 2008, 2009, and 2010 estimated median family incomes for the Decatur MSA were \$53,100, \$55,100, and \$56,100, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Huntsville-Decatur, AL CSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	7	6.3	3,600	2.9	1,541	42.8	25,845	20.5
Moderate	28	25.2	26,638	21.2	3,981	14.9	22,255	17.7
Middle	45	40.5	57,799	45.9	4,118	7.1	26,268	20.9
Upper	31	27.9	37,830	30.1	1,331	3.5	51,499	40.9
NA	0	0.0	0	0.0	0	0.0		
Total	111	100.0	125,867	100.0	10,971	8.7	125,867	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	1,754	1.4	6,386	3.6	2,624	41.1	42,008	23.6
Moderate	23,943	18.7	43,373	24.3	7,764	17.9	28,505	16.0
Middle	61,399	48.1	79,316	44.5	7,896	10.0	32,629	18.3
Upper	40,684	31.8	49,193	27.6	2,588	5.3	75,126	42.1
NA	0	0.0	0	0.0	0	0.0		
Total	127,780	100.0	178,268	100.0	20,872	11.7	178,268	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	1,730	7.0	1,463	6.5	187	13.8	80	7.5
Moderate	5,374	21.6	4,798	21.4	311	22.9	265	24.9
Middle	10,944	44.0	9,913	44.2	534	39.3	497	46.8
Upper	6,820	27.4	6,271	27.9	328	24.1	221	20.8
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	24,868	100.0	22,445	100.0	1,360	100.0	1,063	100.0
	Percentage of Total Businesses:			90.3		5.5		4.3

*NA-Tracts without household or family income as applicable

The area's main economic drivers are aerospace and military technology. The Cummings Research Park is the second largest research park in the United States. Major employers in the market include U.S. Army/Redstone Arsenal, NASA/Marshall Space Flight Center, Huntsville Hospital System, The Boeing Company, and local school systems. The unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Huntsville MSA	4.1%	8.3%	8.0%
Decatur MSA	5%	10.7%	10.5%
Alabama	5.2%	10.5%	9.6%

As evidenced by the elevated unemployment rates, local economic conditions have weakened considerably, although the negative trend has stabilized. One community contact was made within the MSA to gain additional insight into local economic conditions and community credit needs. The contact indicated that the area was holding up better economically compared to other parts of the country due primarily to the significant presence of government contracting through NASA and other government agencies. Nonetheless, the contact observed a decline in small business lending during 2009, but opined that this activity is showing signs of recovery. The contact indicated that local financial institutions are supportive of the local community.

Overall, considering performance context, including review of CRA public evaluations for institutions serving this market, opportunities are relatively available for community development loans and investments within the market area. RBC faces no significant constraints in helping to meet community development needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (6.8%) and dollar volume (7%), exceeds the percentage of branch offices (3.7%) and deposits (4.4%) in the assessment area and is considered good. During the review period, two small farm loans totaling \$39,000 were originated within this assessment area. These loans are not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Huntsville-Decatur, AL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(454)				Home Purchase (12,138)			
Low	0	0.0	0	0.0	29	0.2	2,389	0.1
Moderate	59	13.0	7,184	9.3	1,572	13.0	159,813	8.5
	(575)				Refinance (20,325)			
Low	1	0.2	84	0.1	49	0.2	5,241	0.1
Moderate	47	8.2	6,412	5.6	2,000	9.8	245,485	6.9
	(9)				Home Improvement (1,301)			
Low	0	0.0	0	0.0	7	0.5	63	0.1
Moderate	3	33.3	263	45.2	212	16.3	5,887	10.4
	(1)				Multi-Family (17)			
Low	1	100.0	371	100.0	2	11.8	2,811	11.2
Moderate	0	0.0	0	0.0	8	47.1	12,027	48.1
	HMDA Totals							
Low	2	0.2	455	0.2	87	0.3	10,504	0.2
Moderate	109	10.5	13,859	7.2	3,792	11.2	423,212	7.7
Middle	422	40.6	71,765	37.4	15,813	46.8	2,392,389	43.4
Upper	506	48.7	105,961	55.2	14,089	41.7	2,691,625	48.8
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	1,039	100.0	192,040	100.0	33,781	100.0	5,517,730	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

When considering the bank and aggregate data from 2009, refinance and home purchase loans represent the largest percentage of both bank and aggregate lending. The bank's level of home purchase, and refinance lending in the low- and moderate-income census tracts lags the proportion of owner-occupied housing units located in such areas (1.4%) and (18.7%); however, bank lending in these tracts is comparable to the aggregate reporter level and is considered good. The bank's performance was slightly better in 2008 especially in moderate-income tracts where the bank extended 16.8% of its loans compared to 13.9% for the aggregate. This lending is also considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Huntsville-Decatur, AL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	11	8.6	989	8.2	777	7.3	46,817	10.4
Moderate	19	14.8	1,522	12.6	2,188	20.6	97,087	21.5
Middle	49	38.3	3,887	32.2	4,511	42.4	168,599	37.3
Upper	49	38.3	5,689	47.1	3,154	29.7	139,004	30.8
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	128	100.0	12,087	100.0	10,630	100.0	451,507	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 7% and 21.6% of all area businesses are located in low- and moderate-income census tracts, respectively. During 2009, bank lending to businesses in low-income tracts exceeded both, the D&B percentage and the 2009 aggregate lending level, both proxies for demand. On the other hand, the bank's lending to businesses in moderate-income tracts lags these same proxies. The bank's 2008 lending was somewhat better and overall the penetration of low- and moderate-income areas reflects a good distribution.

The overall geographic loan distribution within this assessment area is considered good given the institution's size, branch locations, effective demand for credit, and the bank's lending performance for both HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Huntsville-Decatur, AL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(449)				(10,606)			
Low	90	20.0	8,870	11.6	1,626	15.3	144,617	8.6
Moderate	126	28.1	17,393	22.7	2,719	25.6	325,184	19.4
	(560)				(16,890)			
	Refinance							
Low	24	4.3	2,184	2.0	1,227	7.3	110,650	3.7
Moderate	92	16.4	11,422	10.3	2,825	16.7	332,429	11.2
	(9)				(1,279)			
	Home Improvement							
Low	1	11.1	107	18.4	220	17.2	2,534	4.6
Moderate	2	22.2	15	2.6	332	26.0	8,276	15.1
	(0)				(0)			
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	115	11.3	11,161	5.9	3,073	10.7	257,801	5.5
Moderate	220	21.6	28,830	15.4	5,876	20.4	665,889	14.2
Middle	222	21.8	35,678	19.0	7,031	24.4	1,024,686	21.9
Upper	461	45.3	112,106	59.7	12,795	44.5	2,737,319	58.4
Total	1,018	100.0	187,775	100.0	28,775	100.0	4,685,695	100.0
Unknown	21		4,265		5,006		832,035	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

Representing the largest proportion of bank lending, the distribution of home purchase and home refinance loans is generally consistent with or exceeds the aggregate data. When considering the bank's performance of all loan types on a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (20.5%), but exceeds the aggregate percentage. Bank lending to moderate-income borrowers exceeds the percentage of moderate-income area families (17.7%) as well as the aggregate reporter lending level. The bank's performance during 2009 is considered good and their performance during 2008 is also considered good with 9% of loans originated to low-income and 20.5% of loans originated to moderate-income borrowers, which was consistent with aggregate lending for that year.

Distribution of Lending by Loan Amount and Size of Business

Huntsville-Decatur, AL CSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	95	74.2	7,711	63.8	2,240	20.9	173,227	38.2
Over \$1 Million	33	25.8	4,376	36.2	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	93	72.7	3,039	25.1	9,769	91.0	137,720	30.4
\$100,001-\$250,000	24	18.8	4,232	35.0	519	4.8	92,765	20.5
\$250,001-\$1 Million	11	8.6	4,816	39.8	446	4.2	223,008	49.2
Total	128	100.0	12,087	100.0	10,734	100.0	453,493	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 20.9% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 90.3% of all businesses have revenues that do not exceed \$1 million per year. By excluding specialized credit card lenders, lending by the remaining traditional lenders was considered for performance context. For this group of lenders, 52.4% of reported small business loans were to businesses having revenues of \$1 million or less. With 74.2% of the bank’s small business loans to businesses with annual revenues of \$1 million or less, the bank’s level of lending is considered excellent and the performance for 2008 is similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank originated two community development loans totaling approximately \$81,000. These loans facilitated affordable housing projects. RBC has extended an adequate level of community development loans. Despite the modest amount of such loans in this particular assessment area, a lower overall lending test performance assessment is not warranted in light of the volume and distribution of other types of lending.

INVESTMENT TEST

Other than donations, no qualified investments were identified that directly benefit this assessment area. The bank has invested in funds through an organization that provides financing for community development projects in a multistate area that includes Alabama; however, no projects are currently funded in the state. During the review period, the bank donated \$7,600 in qualified donations in this market. Because of the lack of targeted investments, investment test performance is considered marginally adequate.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 16 branch offices within this assessment area. Three of the branches (18.8%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering that, according to 2000 census data, 2.9% and 21.2% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Huntsville-Decatur, NC CSA assessment area:

- Alabama A&M CDC (financial education)
- Big Brothers/Big Sisters of North Alabama (community service)
- Committee 100 (small business development)
- Downtown Core (small business development)
- Girl's INC (community service)
- Habitat for Humanity (affordable housing)
- Hartselle Planning Commission (small business development)
- Huntsville/Madison County Chamber of Commerce (small business development)
- Limestone County Economic Development
- Local School Systems (financial education for schools with a high low- and moderate-income enrollment)
- Madison County Homeownership Alliance (financial education for those in need of affordable housing)
- Madison County Schools Foundation (community service)
- Morgan County Economic Development Association (small business development)
- North Alabama Education for Excellence (financial education)
- Northwest Decatur CDC (financial education and small business development)
- United Way (community service)
- Volunteer Center (community service)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN BIRMINGHAM-HOOVER,
ALABAMA MSA**

This assessment area is a part of the Birmingham-Hoover, Alabama MSA and has a population of 870,082. The bank operates 17 branches within this market area. As of June 2009, RBC ranked 8th in deposit market share having 3.3% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Regions Bank, Compass Bank, and Wachovia Bank, NA., accounting for a deposit market share of 61.1%. According to 2009 aggregate loan data, RBC ranked 21st in reported residential mortgage loans and 19th in reported small business loans. The aggregate data include 418 residential mortgage loan and 75 small business loan reporters. Both market share rankings consider originated and purchased loans.

The assessment area median housing value as of 2000 was \$94,826 and the MSA's owner-occupancy rate of 63.9% is lower than the state's rate of 64.1% and the MSA's rate of 65.3%. The assessment area's family poverty rate of 10.3% is lower than the overall state's rate of 12.5% as well as the MSA's rate of 10.6%. The 2008, 2009, and 2010 estimated median family incomes for the MSA were \$59,100, \$60,900, and \$61,700, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Birmingham-Hoover, AL MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	8.5	12,468	5.3	5,203	41.7	48,581	20.5
Moderate	46	24.5	46,037	19.5	9,514	20.7	39,091	16.5
Middle	66	35.1	89,461	37.8	7,313	8.2	47,241	20.0
Upper	60	31.9	88,631	37.5	2,281	2.6	101,684	43.0
NA	0	0.0	0	0.0	0	0.0		
Total	188	100.0	236,597	100.0	24,311	10.3	236,597	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	6,654	2.8	20,720	6.1	8,918	43.0	79,679	23.3
Moderate	41,564	17.4	71,268	20.8	17,018	23.9	51,835	15.2
Middle	94,782	39.6	127,978	37.4	13,958	10.9	61,821	18.1
Upper	96,408	40.3	121,988	35.7	5,438	4.5	148,619	43.5
NA	0	0.0	0	0.0	0	0.0		
Total	239,408	100.0	341,954	100.0	45,332	13.3	341,954	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	4,883	10.5	3,999	9.7	537	17.8	347	14.9
Moderate	6,086	13.1	5,377	13.1	397	13.2	312	13.4
Middle	15,526	33.4	13,931	33.9	844	28.0	751	32.1
Upper	19,991	43.0	17,829	43.3	1,236	41.0	926	39.6
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	46,486	100.0	41,136	100.0	3,014	100.0	2,336	100.0
Percentage of Total Businesses:				88.5		6.5		5.0

*NA-Tracts without household or family income as applicable

The area economy is diverse with industries ranging from services such as banking and finance to health-related technological research and heavy industry. Major employers in the area include Alabama Power, BlueCross/Blue Shield of Alabama, HealthSouth, and the University of Alabama at Birmingham. The economy evidences weakness as reflected in the unemployment rates for the three prior years presented in the following table:

	June 2008	June 2009	June 2010
Birmingham-Hoover, AL MSA	4.7%	10.3%	10%
Alabama	5.2%	10.5%	9.6%

Unlike the case in many other markets the bank serves, its small business lending in this market declined only modestly between 2008 and 2009, despite the observed weakness in the local economy.

One community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact indicated that the market has experienced high levels of foreclosure during the economic recession and home sales have declined somewhat. Despite economic weakness, the contact indicated that local financial institutions are supportive of the local community. Available performance context information suggests that local opportunities are reasonably available for community development loans and investments within the market area. Given the bank's strategy, RBC faces no constraints to engaging in community development endeavors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered adequate. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (4.2%) and dollar volume (5.4%), is consistent with the percentage of branch offices (3.9%) and deposits (4.6%) in the assessment area and is considered good. During the review period, two small farm loans totaling \$455,000 were originated within this assessment area. These loans are not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Birmingham-Hoover, AL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(227)				Home Purchase (15,185)			
Low	0	0.0	0	0.0	116	0.8	12,234	0.5
Moderate	5	2.2	599	1.3	839	5.5	65,283	2.7
	(365)				Refinance (31,251)			
Low	1	0.3	41	0.0	213	0.7	22,317	0.4
Moderate	6	1.6	733	0.8	1,565	5.0	137,959	2.4
	(5)				Home Improvement (1,155)			
Low	0	0.0	0	0.0	16	1.4	515	0.7
Moderate	0	0.0	0	0.0	124	10.7	4,184	5.7
	(0)				Multi-Family (51)			
Low	0	0.0	0	0.0	7	13.7	21,798	15.8
Moderate	0	0.0	0	0.0	15	29.4	9,483	6.9
	HMDA Totals							
Low	1	0.2	41	0.0	352	0.7	56,864	0.7
Moderate	11	1.8	1,332	1.0	2,543	5.3	216,909	2.6
Middle	156	26.1	25,697	19.0	17,457	36.6	2,483,738	29.7
Upper	429	71.9	107,933	79.9	27,290	57.3	5,607,222	67.0
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	597	100.0	135,003	100.0	47,642	100.0	8,364,733	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market, refinance transactions were the largest HMDA lending category both by number and dollar volume of loans. Home purchase loans were the second most voluminous product while home improvement lending was modest. The bank's level of home purchase and refinance lending in both low- and moderate-income census tracts lags the proportion of owner-occupied housing units located in such areas (2.8%) and (17.4%) as well as the percentage of aggregate lending in such tracts. Compared to these proxies for demand, the bank's lending in low- and moderate-income tracts is considered poor. The 2008 performance is similar and also considered poor.

Distribution of Small Business Loans by Income Level of Census Tract

Birmingham-Hoover, AL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	17	14.0	2,287	15.2	1,820	9.3	133,473	15.4
Moderate	5	4.1	554	3.7	1,982	10.2	76,915	8.9
Middle	28	23.1	3,859	25.7	5,759	29.5	206,836	23.9
Upper	71	58.7	8,338	55.4	9,963	51.0	448,862	51.8
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	121	100.0	15,038	100.0	19,524	100.0	866,086	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 10.5% and 13.1% of all area businesses are located in low- and moderate-income census tracts, respectively. As reflected in the preceding table, the bank's lending in low-income tracts exceeds the D&B data figures as well as the market aggregate percentages. Conversely, its performance in moderate-income tracts lags both lending demand proxies. Overall, RBC's geographic distribution in 2009 is considered good, largely because of its performance in low-income tracts. During 2008, the bank's performance was stronger. RBC originated 18.8% and 9.9% of small business loans in low- and moderate-income census tracts, respectively, exceeding the aggregate performance for both types of tracts. The bank's performance during 2008 is considered excellent.

The bank's small business lending performance for each year was weighted with a slightly higher consideration given to 2008 lending (\$16.9 million for 2008 and \$15 million for 2009) resulting in an overall small business geographic distribution performance that is considered excellent.

The volume of HMDA lending far outweighs small business lending. Given this fact and considering the institution's size, branch locations, effective demand for credit, and lending performance for both loan products, the overall geographic loan distribution within this assessment area is considered poor.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Birmingham-Hoover, AL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(227)				(13,019)			
Low	22	9.7	2,287	4.9	1,534	11.8	135,063	6.3
Moderate	83	36.6	11,346	24.2	3,677	28.2	452,925	21.2
	(361)				(25,668)			
	Refinance							
Low	13	3.6	1,228	1.4	1,555	6.1	145,878	3.0
Moderate	51	14.1	7,393	8.5	4,216	16.4	512,201	10.6
	(5)				(1,092)			
	Home Improvement							
Low	0	0.0	0	0.0	172	15.8	4,082	6.0
Moderate	1	20.0	3	0.7	228	20.9	8,769	12.9
	(0)				(0)			
	Multi-Family							
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	35	5.9	3,515	2.6	3,261	8.2	285,023	4.1
Moderate	135	22.8	18,742	14.0	8,121	20.4	973,895	13.9
Middle	87	14.7	16,165	12.0	10,137	25.5	1,536,351	21.9
Upper	336	56.7	95,907	71.4	18,260	45.9	4,232,730	60.2
Total	593	100.0	134,329	100.0	39,779	100.0	7,027,999	100.0
Unknown	4		674		7,863		1,336,734	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

Refinance and home purchase loans represent the largest proportion of both bank and aggregate lending for 2009. The bank's home purchase lending is consistent with or exceeds the aggregate data. RBC's refinance lending is consistent with aggregate lending to moderate-income borrowers but compares unfavorably to low-income aggregate percentage. When considering the bank's performance across all loan types, lending to low-income borrowers lags the percentage of low-income families residing within

the assessment area (20.5%) and is slightly below the aggregate reporter level. Bank lending to moderate-income borrowers exceeds the percentage of moderate-income area families (16.5%) as well as the aggregate reporter level. This level of lending is considered good, as is the bank's 2008 performance which was similar.

Distribution of Lending by Loan Amount and Size of Business

Birmingham-Hoover, AL MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	66	54.5	5,160	34.3	3,945	19.9	267,360	30.7
Over \$1 Million	52	43.0	9,853	65.5	NA	NA	NA	NA
Unknown	3	2.5	25	0.2	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	85	70.2	3,054	20.3	18,254	91.9	281,810	32.3
\$100,001-\$250,000	19	15.7	3,266	21.7	755	3.8	136,364	15.6
\$250,001-\$1 Million	17	14.0	8,718	58.0	846	4.3	453,329	52.0
Total	121	100.0	15,038	100.0	19,855	100.0	871,503	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 19.9% of reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 88.5% of all local businesses have revenues that do not exceed \$1 million per year. After excluding large credit card lenders, 47% of reported small business loans were to businesses having revenues of \$1 million or less. This level of lending is considered to be at the high end of the range for good performance. In 2008 the bank evidenced stronger performance with 81.2% of its small business loans made to companies with revenues of \$1 million or less. The 2008 performance is considered excellent. Overall, given the relative weighting of its 2008 and 2009 lending performances, the bank's level of lending is considered excellent.

Overall, weighing HMDA performance more heavily due to greater dollar loan volume, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank extended three community development loans totaling approximately \$2.1 million. One loan was community service-related supporting health care in the area and the other two loans were for affordable housing projects in this market. RBC has made a relatively high level of community development loans.

INVESTMENT TEST

Other than donations, no qualified investments were identified that directly benefit this assessment area. The bank has invested in funds through an organization that provides financing for community development projects in a multistate area that includes Alabama; however, no projects are currently funded in the state. During the review period, the bank donated \$13,500 in qualified donations in this market. Because of the lack of targeted investments, investment test performance is considered marginally adequate.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 17 branch offices within this assessment area. Three of the branches (17.6%) are located in low-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering that, according to 2000 census data, 5.3% and 19.5% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Birmingham-Hoover MSA assessment area:

- Bessemer Salvation Army (community service)
- Birmingham AIDS Outreach (community service)
- Birmingham Homeownership Center (financial education for those seeking affordable housing)
- Birmingham Urban League (community service)
- Daughters of Sarah Inc. (financial education for individuals in need of assistance)
- Girls Inc. (community service)
- Governor's Statewide Interagency of Homelessness of Alabama (community service)
- Help to Others Foundation (community service)
- Housing Enterprise of Central of Alabama (affordable housing)
- Impact of Alabama (community service)
- Jefferson County Economic Development Authority (small business development)
- King's Ranch – Hannah Homes (community service)
- Local School Systems (financial education for schools with high low- and moderate-income enrollment)
- Lovely Lady Center (provides community services for at risk women and children)
- Nation Urban League (community service)
- Neighborhood Housing Services of Birmingham Inc. (affordable housing-financial education)
- Operation New Birmingham (small business development)
- Pathways (small business development)
- St. Vincent's Hospital (financial education for those seeking affordable housing)
- The Literacy Council (financial education)
- United Way of Central Alabama (community service)

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF ALABAMA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	Investment Test	Service Test
Auburn-Opelika MSA	Exceeds	Consistent	Consistent
Mobile MSA	Exceeds	Exceeds	Consistent
Montgomery MSA	Exceeds	Consistent	Consistent
Tuscaloosa MSA	Exceeds	Consistent	Consistent

NONMETROPOLITAN STATEWIDE AREA

(If none of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN AREAS OF ALABAMA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	Investment Test	Service Test
Baldwin	Consistent	Consistent	Consistent
Clay	Exceeds	Consistent	Consistent
Dallas	Consistent	Consistent	Consistent

STATE

CRA RATING FOR GEORGIA⁴: SATISFACTORY

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is adequate relative to the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- While varying by product, the geographic distribution is considered excellent overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- While varying by product, the borrower distribution is considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- An adequate level of community development loans has been extended to assist affordable housing, economic development projects, and other community needs.
- The bank maintains a significant level of qualified investments that benefit statewide and regional areas.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A relatively high level of participation in qualified community development services that benefit affordable housing, micro-enterprise development, and community service needs was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are six assessment areas within the State of Georgia. The composition of each of these assessment areas is provided in **APPENDIX E** of this evaluation.

On a combined basis, the six statewide assessment areas account for 6.6%, 14.8%, and 14.7% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the State of Georgia was evaluated by reviewing the Atlanta-Sandy Springs-Marietta MSA assessment area using full scope interagency examination procedures. For assessment areas subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

The institution has 64 branch offices located throughout the State of Georgia, the overwhelming majority of which are in the Atlanta MSA, and ranks 7th in deposit market share having 2.6% of the state's available FDIC insured deposits in the combined markets where the bank has branches (credit union deposits are not included). Two (3.1%) offices are located in low-income areas and seven (10.9%) are located in moderate-income areas. The bank holds approximately \$2.7 billion in deposits within the statewide area.

Based on 2000 census data, the Georgia assessment areas have a total population of approximately 3.8 million, including 951,836 families. A majority of the families are middle- and upper-income (63.5%), while low- and moderate-income families comprise 19.3% and 17.2% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 61%, and 7.5% of families live below the poverty level. The 2008, 2009, and 2010 median family incomes for MSAs and statewide nonmetropolitan areas are provided in their respective market analyses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

Overall, the statewide lending test is rated outstanding based upon the bank's single largest market in state reviewed with full scope procedures. The geographic distribution is considered excellent, while the borrower distribution and provision of community development loans are considered good.

Lending Activity:

Overall, lending activity is considered excellent and consistent with the bank's capacity. According to 2009 market share data, the bank ranks 25th and 54th in small business/farm and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's overall distribution of lending is considered excellent although lending performance varies by product. When reaching overall conclusions, HMDA lending performance received the most weight as the category typically accounted for significantly greater volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank extended an adequate level of community development lending by dollar volume that qualifies as community development loans. During the evaluation period, RBC funded community development loans totaling \$2.2 million in Georgia; however, only two such loans totaling \$261,000 were originated in any of the bank's assessment areas.

INVESTMENT TEST

The institution's level of qualified investments benefiting Georgia is considered high satisfactory. The bank has a qualified investment totaling \$2.3 million in Magnolia House (LIHTC) in the Atlanta-Sandy Springs-Marietta, Georgia MSA. The bank also has a \$2.4 million investment in an affordable mortgage backed security that benefits the statewide area. During the evaluation period, the bank made donations of \$48,750 to organizations providing community development services within the state.

SERVICE TEST

The statewide rating for the institution under the service test is rated high satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the Georgia markets are representative of those offered by the institution overall. The bank's community development services are discussed as part of each assessment area evaluation.

METROPOLITAN AREAS

(For metropolitan areas with some or all assessment areas reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ATLANTA-SANDY SPRINGS-MARIETTA, GEORGIA MSA

This assessment area includes a portion of the Atlanta-Sandy Springs-Marietta, Georgia MSA and has a population of approximately 3.5 million. The bank operates 53 branches within this market area. As of June 2010, RBC ranked 7th in deposit market share having 2.4% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with SunTrust, Wachovia Bank, NA., and Bank of America NA., accounting for a deposit market share of 61.7%. According to 2009 aggregate loan data, RBC ranked 59th in reported residential mortgage loans and 24th in reported small business loans. The aggregate data include 806 residential mortgage loan and 167 small business loan reporters. Both market share rankings consider originated and purchased loans.

The assessment area median housing value was \$137,999 as of 2000. According to census data, the assessment area's owner-occupancy rate of 61.4% is lower than both the state's rate of 61.8% and the MSA's rate of 63.1%. The family poverty rate for the assessment area of 6.8% is less than the MSA's rate of 7% and the state's rate of 9.9%. The 2008, 2009, and 2010 estimated median family incomes for the MSA equaled \$69,200, \$71,700, and \$71,800, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Atlanta-Sandy Springs-Marietta, GA MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	69	12.5	47,368	5.4	16,268	34.3	166,058	18.9
Moderate	128	23.2	170,386	19.4	20,701	12.1	151,837	17.3
Middle	184	33.4	339,827	38.7	16,062	4.7	190,082	21.7
Upper	170	30.9	319,905	36.5	7,032	2.2	369,509	42.1
NA	0	0.0	0	0.0	0	0.0		
Total	551	100.0	877,486	100.0	60,063	6.8	877,486	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	22,617	2.7	77,754	6.1	26,871	34.6	261,362	20.4
Moderate	119,781	14.4	267,568	20.9	34,810	13.0	219,337	17.1
Middle	338,875	40.8	488,577	38.1	30,856	6.3	261,179	20.4
Upper	349,608	42.1	449,080	35.0	16,674	3.7	541,101	42.2
NA	0	0.0	0	0.0	0	0.0		
Total	830,881	100.0	1,282,979	100.0	109,211	8.5	1,282,979	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	11,334	4.6	9,675	4.4	817	6.2	842	7.3
Moderate	39,955	16.4	35,476	16.2	2,313	17.7	2,166	18.7
Middle	90,402	37.1	82,042	37.4	4,422	33.8	3,938	34.1
Upper	102,186	41.9	92,044	42.0	5,532	42.3	4,610	39.9
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	243,877	100.0	219,237	100.0	13,084	100.0	11,556	100.0
Percentage of Total Businesses:				89.9		5.4		4.7

*NA-Tracts without household or family income as applicable

The local economy is diversified with a significant number of Fortune 500 companies. Major employers include The Home Depot, UPS, Coca-Cola Company, and Delta Airlines. The unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Atlanta-Sandy Springs-Marietta, GA MSA	6.2%	10.2%	10.3%
Georgia	6.3%	10.3%	10.3%

Contact was made with two individuals knowledgeable of area economic conditions to discuss community credit needs. The contacts both stated that there has been a significant decline in the housing market during the economic recession. They also expressed the opinion that area small business were finding it difficult to obtain new credit, and in some instances, to get renewals on maturing lines of credit. These observations are consistent with the significant rise in unemployment rates between 2008

and 2009 evidencing slowing economic activity. Additionally, unlike many markets in which the bank operates, there has not been a noticeable decline in the unemployment rates in the Atlanta market between 2009 and 2010. Despite the economic challenges, both contacts felt that local financial institutions are supportive of the local community.

Available performance context information, including the review of CRA public evaluations for other institutions serving this market, indicates that opportunities are considerable for community development loans and investments within the market area. Given the bank's strategy, RBC faces no constraints to engaging in community development endeavors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered excellent. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (7.4%) and dollar volume (6%), is below the percentage of branch offices (12.2%) and deposits (13.2%) in the assessment area but is considered adequate given the bank's overall high level of lending relative to its capacity and local economic conditions. During the review period, one small farm loan totaling \$8,000 was originated within this assessment area. This loan is not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Atlanta-Sandy Springs-Marietta, GA MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(154)				Home Purchase (78,293)			
Low	7	4.5	899	3.0	2,431	3.1	354,405	2.6
Moderate	16	10.4	1,660	5.6	10,251	13.1	1,253,062	9.2
	(377)				Refinance (129,188)			
Low	6	1.6	957	1.4	2,054	1.6	359,245	1.3
Moderate	33	8.8	5,777	8.4	10,909	8.4	1,637,650	6.1
	(6)				Home Improvement (3,133)			
Low	0	0.0	0	0.0	41	1.3	2,503	0.7
Moderate	3	50.0	200	49.5	295	9.4	19,133	5.7
	(0)				Multi-Family (114)			
Low	0	0.0	0	0.0	16	14.0	83,536	8.2
Moderate	0	0.0	0	0.0	27	23.7	128,025	12.6
	HMDA Totals							
Low	13	2.4	1,856	1.9	4,542	2.2	799,689	1.9
Moderate	52	9.7	7,637	7.7	21,482	10.2	3,037,870	7.2
Middle	192	35.8	29,021	29.3	83,597	39.7	13,743,762	32.7
Upper	280	52.1	60,446	61.1	101,107	48.0	24,435,579	58.2
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	537	100.0	98,960	100.0	210,728	100.0	42,016,900	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market, refinance transactions accounted for the largest volume of HMDA lending both by number and dollar volume of loans. Home purchase loans were the second in volume while home improvement lending was nominal. RBC's refinance and home purchase lending is generally comparable to aggregate lending in low- and moderate-income tracts. Overall, bank lending is comparable to the percentage of owner-occupied housing units in low-income tracts (2.7%) but lags the percentage of owner-occupied housing units (14.4%) within moderate-income tracts. Aggregate lending suggests lower demand in moderate-income tracts and the bank's level of lending is considered good. The bank's 2008 performance was stronger and is considered excellent, with 3.9% of lending in low-income tracts and 19.8% in moderate-income tracts, exceeding the 2008 aggregate performance for that year. Overall, the bank's lending performance is deemed excellent considering both 2009 and 2008 data and comparable lending volume in 2009 and 2008.

Distribution of Small Business Loans by Income Level of Census Tract

Atlanta-Sandy Springs-Marietta, GA MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	14	4.8	2,795	11.4	2,631	3.2	122,401	3.8
Moderate	39	13.4	4,932	20.2	10,573	13.0	461,834	14.4
Middle	89	30.7	7,029	28.8	28,708	35.4	1,028,218	32.0
Upper	148	51.0	9,691	39.6	39,210	48.3	1,605,534	49.9
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	290	100.0	24,447	100.0	81,122	100.0	3,217,987	100.0

*NA-Tracts without household or family income as applicable

RBC’s level of small business lending in low-income areas is greater than the percentage of businesses located in such areas (4.6%) as well as the aggregate reporter lending level. Bank small business lending in moderate-income census tracts lags slightly the percentage of businesses located in such tracts (16.4%) but slightly exceeds the aggregate reporter level (13%). The bank’s performance during 2009 is considered good. The bank’s performance during 2008 was substantially similar and is also considered good.

HMDA lending was weighted more heavily in the analysis of overall geographic loan distribution due to greater loan volume. Performance within this assessment area is considered excellent given the institution’s size, branch locations, effective demand for credit, and lending performance for the bank’s HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Atlanta-Sandy Springs-Marietta, GA MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(152) Home Purchase				(68,208)			
Low	28	18.4	2,473	8.5	11,237	16.5	1,061,047	8.6
Moderate	35	23.0	4,313	14.9	20,798	30.5	2,779,014	22.4
	(369) Refinance				(100,483)			
Low	28	7.6	2,546	3.8	6,467	6.4	760,582	3.5
Moderate	68	18.4	9,581	14.2	17,016	16.9	2,460,158	11.3
	(5) Home Improvement				(2,997)			
Low	1	20.0	27	7.3	279	9.3	13,821	4.3
Moderate	1	20.0	10	2.7	530	17.7	39,064	12.2
	(0) Multi-Family				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	57	10.8	5,046	5.2	17,983	10.5	1,835,450	5.3
Moderate	104	19.8	13,904	14.4	38,344	22.3	5,278,236	15.3
Middle	107	20.3	16,997	17.6	39,812	23.2	7,018,330	20.3
Upper	258	49.0	60,882	62.9	75,549	44.0	20,406,520	59.1
Total	526	100.0	96,829	100.0	171,688	100.0	34,538,536	100.0
Unknown	11		2,131		39,040		7,478,364	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

Demographic data from the 2000 census indicates that within the assessment area, 18.9% and 17.3% of families are low- and moderate-income, respectively. In the case of both refinance and home purchase loans, RBC's lending to low-income borrowers is consistent with the 2009 aggregate lending level though less than the percentages of such families in the market. In the case of moderate-income borrowers, bank lending slightly exceeds the percent of moderate-income families, but in the case of home purchase lending, and overall, was below the aggregate lending level. Considering both the demographic and aggregate proxies for demand, the overall lending performance is considered good, as is the bank's 2008 performance which was similar.

Distribution of Lending by Loan Amount and Size of Business

Atlanta-Sandy Springs-Marietta, GA MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	178	61.4	10,743	43.9	17,507	21.4	1,139,885	35.3
Over \$1 Million	108	37.2	13,641	55.8	NA	NA	NA	NA
Unknown	4	1.4	63	0.3	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	237	81.7	5,926	24.2	75,545	92.2	807,045	25.0
\$100,001-\$250,000	24	8.3	4,078	16.7	2,902	3.5	520,483	16.1
\$250,001-\$1 Million	29	10.0	14,443	59.1	3,520	4.3	1,904,992	58.9
Total	290	100.0	24,447	100.0	81,967	100.0	3,232,520	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

In 2009, 21.4% of the reported aggregate small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 89.9% of all local businesses have revenues that do not exceed \$1 million per year. Considering 2009 data after excluding large credit card lenders, 54.6% of reported small business loans were to businesses having revenues of \$1 million or less. For 2009, the bank's lending to businesses of different sizes is considered to be good. For 2008, performance in the market was slightly better with 65.2% of its small business loans made to companies with revenues of \$1 million or less. This lending also compared favorably to the performance of traditional lenders (excluding credit card lenders) for that year and is considered excellent. Overall, compared to the proxies for demand and weighting the 2009 and 2008 performance based on dollar volume of lending, the bank's level of lending is excellent.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, two qualified community loans totaling approximately \$261,000 were originated in the assessment area. The loans financed the construction of affordable housing projects throughout the assessment area. This represents a relatively high level of community development lending.

INVESTMENT TEST

In addition to investments benefiting the regional or statewide area, specific to this assessment area the bank has a \$2.3 million investment in Magnolia Housing Partners Limited Partnership, an affordable housing project. The bank has also donated \$38,000 to organizations and other entities, some of which provide social services primarily targeted to low- and moderate-income individuals and others that provide economic development assistance. RBC has provided a high level of community development investments in this assessment area.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered good. Systems for delivering retail banking are accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 53 branch offices within this assessment area. Two of the branches (3.8%) are located in low-income areas, and four of the branches (7.5%) are located in moderate-income areas. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering 2000 census data that indicates that 5.4% and 19.4% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Atlanta-Sandy Springs-Marietta, GA MSA assessment area:

- Georgia Lenders Quality Circle (small business development)
- Housing Authorities of DeKalb and Fulton County (financial education & affordable housing)
- Kennesaw State University Small Business Development Center (small business development)
- Metro Atlanta Chamber of Commerce (small business development)
- Habitat for Humanity (affordable housing)
- Latin America Association (financial education)
- Local School Systems (financial education for schools with high low- and moderate-income enrollment)
- Milton Business Alliance (small business development)
- National Alliance of Mental Illness (community service)

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF GEORGIA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. The bank has a very limited presence in these markets, and where performance is considered below it is nonetheless at least adequate. In particular, the assessment of investment test performance is based on the benefits associated with investments the benefit a broader regional or statewide area where the benefits are dispersed across a large geographic area.

Assessment Area	Lending Test	Investment Test	Service Test
Columbus MSA	Below	Below	Below
Macon MSA	Below	Below	Consistent

NONMETROPOLITAN STATEWIDE AREA

(If none of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMETROPOLITAN AREAS OF GEORGIA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. In the case where the performance was considered below, the performance was at least adequate for the assessment area. Community development opportunities are particularly limited in these predominately rural areas, and performance is considered in this context.

Assessment Area	Lending Test	Investment Test	Service Test
Dooly	Below	Below	Below
Polk	Consistent	Below	Below
Troup	Below	Below	Consistent

STATE

CRA RATING FOR FLORIDA⁵: SATISFACTORY

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

Major factors supporting the rating include:

- Lending activity is adequate relative to the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- While varying by product, geographic and borrower distribution are both considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- A high level of community development loans has been extended to assist affordable housing, economic development projects, and other community needs.
- The bank maintains a significant level of qualified investments that benefit statewide and regional areas.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- An adequate level of participation in qualified community development services that generally benefit affordable housing and micro-enterprise development was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are 12 assessment areas within the State of Florida. The composition of each of these assessment areas is defined in **APPENDIX E** of this evaluation.

On a combined basis, the 12 statewide assessment areas account for 9.3%, 19.8%, and 14.4% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the State of Florida was evaluated by reviewing the Orlando-Deltona-Daytona Beach CSA, Miami-Fort Lauderdale-Pompano Beach MSA, and the Palm Bay-Melbourne-Titusville MSA assessment areas using full scope interagency examination procedures. In arriving at an overall state rating, individual assessment area performances were generally weighted by their dollar volume of lending. Therefore, the greatest weight was given to the performance of the Orlando-Deltona-Daytona Beach CSA assessment area. For assessment areas subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

The institution has 86 branch offices located throughout the State of Florida and ranks 20th in deposit market share having .8% of the state's available FDIC insured deposits in the combined markets where the bank has branches (credit union deposits are not included). No branch offices are located in low-income areas and 12 (14%) are located in moderate-income areas. The bank holds approximately \$2.7 billion in deposits within the statewide area.

Based on 2000 census data, the Florida assessment areas have a total population of approximately 10.3 million, including 2.7 million families. A majority of the families are middle- and upper-income (61.5%), while low- and moderate-income families comprise 19.9% and 18.5% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 60.2%, and 9.2% of families live below the poverty level. The 2008, 2009, and 2010 median family incomes for MSAs are provided in their respective assessment area evaluations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

Overall, the statewide lending test is rated high satisfactory. Of the three markets reviewed with full scope procedures, the greatest weight was given to the performance within the Orlando-Deltona-Daytona Beach, Florida CSA assessment area as of largest dollar volume of loans (28.8%) were extended within this assessment area for the statewide area. Lending activity is considered adequate and is measured primarily by market share. Geographic and borrower lending distribution and provision of community development loans are also considered good overall.

Lending Activity:

Overall, lending activity is considered adequate and generally consistent with the bank's capacity. According to 2009 market share data, the bank ranks 37th and 55th in small business/farm and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's distribution of lending is considered good. Lending performance varies by both product and market. When reaching overall conclusions, HMDA lending performance primarily received the most weight as the category typically accounted for significantly more volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank extended a relatively high level of lending by dollar volume that qualifies as community development loans. During the evaluation period, RBC originated ten loans totaling \$944,000 within Florida. Some of the loans facilitated affordable housing projects within the state while others helped to provide community development services. Three of the loans totaling \$340,000 benefited affordable housing projects in the State of Florida, outside of any of the bank's assessment areas. The remaining seven loans originated in this state are discussed in their respective assessment area evaluations.

INVESTMENT TEST

The institution's level of qualified investments benefiting Florida is considered high satisfactory. The bank has purchased a mortgage-backed security totaling \$2.5 million that help to provide housing to low- and moderate-income individuals throughout the state. Additionally, the bank has committed to fund \$5 million (\$4.9 million currently funded) through Apollo that benefits the Miami assessment area within the state. RBC has also made \$66,250 in qualified donations that benefit the state-wide area.

SERVICE TEST

The statewide rating for the institution under the service test is low satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the Florida markets are representative of those offered by the institution overall. Among the bank's community development services that benefit multiple areas of Florida is participation with a not-for-profit corporation that provides housing for at risk youth as well as a financial literacy program through a local university.

METROPOLITAN AREAS

*(For metropolitan areas with some or all assessment areas
reviewed using full-scope review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ORLANDO-DELTONA-DAYTONA BEACH, FLORIDA CSA

This assessment area includes the Orlando-Deltona-Daytona Beach, Florida CSA and is made up of three Florida MSAs: the Orlando-Kissimmee-Sanford MSA, the Deltona-Daytona Beach-Ormond Beach MSA, and the Palm Coast MSA. According to 2000 census data, the assessment area has a population of 2.1 million. The bank operates 27 branches within this market area. As of June 2009, RBC ranked 9th in deposit market share having 1.6% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with SunTrust, Bank of America, NA., and Wachovia Bank, NA., accounting for a deposit market share of 54.8%. According to 2009 aggregate loan data, RBC ranked 46th in reported residential mortgage loans and 25th in reported small business loans. The aggregate data include 762 residential mortgage loan and 130 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value for the CSA, based on the 2000 census, is \$95,443. The owner-occupancy rate of 62.1% for the assessment area is higher than the state's rate of 60.8%. The assessment area's family poverty rate of 7.7% is lower than the state's rate of 9%. When evaluating lending, the median family income for each MSA with the CSA is considered. The 2008, 2009, and 2010 estimated median family incomes for the Orlando-Kissimmee-Sanford, Florida MSA equaled \$59,200, \$60,700, and \$60,900, respectively. The 2008, 2009, and 2010 estimated median family incomes for the Deltona-Daytona Beach-Ormond Beach, Florida MSA were \$52,300, \$55,200, and \$56,000, respectively. The 2008, 2009, and 2010 estimated median family incomes for the Palm Coast MSA equaled 55,600, 56,600, and 56,300.

The following table includes additional pertinent demographic data for the market area:

Assessment Area Demographics

Orlando-Deltona-Daytona Beach, FL CSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	2.4	6,684	1.2	2,669	39.9	103,688	18.4
Moderate	91	22.1	106,688	18.9	15,769	14.8	107,286	19.0
Middle	209	50.7	310,691	55.0	21,048	6.8	129,083	22.9
Upper	102	24.8	140,740	24.9	4,207	3.0	224,746	39.8
NA	0	0.0	0	0.0	0	0.0		
Total	412	100.0	564,803	100.0	43,693	7.7	564,803	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	3,237	0.6	11,307	1.4	4,696	41.5	173,124	20.8
Moderate	87,779	15.4	168,791	20.3	28,798	17.1	148,418	17.9
Middle	327,595	57.3	460,640	55.4	40,639	8.8	174,333	21.0
Upper	152,874	26.8	190,613	22.9	8,999	4.7	335,476	40.4
NA	0	0.0	0	0.0	0	0.0		
Total	571,485	100.0	831,351	100.0	83,132	10.0	831,351	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	2,215	1.4	1,872	1.3	197	2.6	146	2.3
Moderate	28,979	18.4	25,572	17.8	1,833	24.6	1,574	24.7
Middle	82,130	52.1	75,403	52.5	3,558	47.7	3,169	49.7
Upper	44,211	28.1	40,858	28.4	1,868	25.1	1,485	23.3
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	157,535	100.0	143,705	100.0	7,456	100.0	6,374	100.0
	Percentage of Total Businesses:			91.2		4.7		4.0

*NA-Tracts without household or family income as applicable

The local economy is heavily reliant on vacation and tourism activities; however, there are many healthcare and retail trade job opportunities in the area. Walt Disney and Universal Orlando are large area employers representing the vacation and tourism industry, while Adventist Health System provides healthcare jobs, and Publix Super Markets Inc., provides a large number of retail jobs in the area. State government and public school system jobs also act as major employment opportunities in the area. The unemployment rates for the three prior years are presented in the following table:

	June 2008	June 2009	June 2010
Orlando-Kissimmee-Sanford, FL MSA	5.7%	10.6%	11.4%
Deltona-Daytona Beach-Ormond Beach, FL MSA	6.4%	11.2%	12.1%
Palm Coast, FL MSA	9.1%	14.7%	15.4%
Florida	6.1%	10.5%	11.4%

Two community contacts were made within the MSA to discuss local economic conditions and community credit needs. One contacts indicated a need for more micro-enterprise loans, while the other identified a need for more refinance and home improvement lending to consumers. In general, the contacts acknowledged that while the financial education programs and networking opportunities facilitated by area banks present great opportunity, they seem to have not yet yielded a large number of loans to help the area's economy. The contacts acknowledged that financial institutions are supportive, but there still is a need for actions that will have greater financial impact.

Overall, performance context information suggests that local opportunities are considerable for community development loans and investments within the market area. Given the bank's strategy and capacity, RBC faces no constraints in taking advantage of community development opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (2.8%) and dollar volume (2.7%), is below the percentage of branch offices (6.2%) and deposits (3.9%) in the assessment area and is considered adequate. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Orlando-Deltona-Daytona Beach, FL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(134)				Home Purchase (40,018)			
Low	0	0.0	0	0.0	69	0.2	6,540	0.1
Moderate	12	9.0	1,347	5.1	4,548	11.4	536,292	8.3
	(83)				Refinance (33,577)			
Low	0	0.0	0	0.0	69	0.2	8,124	0.1
Moderate	9	10.8	1,143	6.9	2,959	8.8	397,048	6.6
	(4)				Home Improvement (1,285)			
Low	0	0.0	0	0.0	2	0.2	192	0.2
Moderate	0	0.0	0	0.0	133	10.4	8,669	7.6
	(0)				Multi-Family (41)			
Low	0	0.0	0	0.0	1	2.4	2,202	1.0
Moderate	0	0.0	0	0.0	9	22.0	13,221	5.7
	HMDA Totals							
Low	0	0.0	0	0.0	141	0.2	17,058	0.1
Moderate	21	9.5	2,490	5.7	7,649	10.2	955,230	7.4
Middle	120	54.3	21,253	49.0	41,157	54.9	6,316,763	49.2
Upper	80	36.2	19,632	45.3	25,974	34.7	5,540,408	43.2
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	221	100.0	43,375	100.0	74,921	100.0	12,829,459	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Home purchase transactions represent the largest category of HMDA lending both by number and dollar volume. Refinance loans were the second most voluminous product, while comparatively few home improvement loans were reported and multifamily lending was nominal. As reflected in the preceding table, the bank's overall performance in both low- and moderate-income tracts, by number of loans, is comparable to the 2009 aggregate lending level while lower than the percentage of owner-occupied housing units in those tracts (.6% and 15.4%, respectively). The bank's performance for 2009 and 2008 is comparable and overall is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Orlando-Deltona-Daytona Beach, FL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	0	0.0	0	0.0	575	1.2	23,245	1.7
Moderate	23	15.5	1,014	8.7	7,962	16.3	264,666	19.8
Middle	84	56.8	5,918	50.6	24,852	50.8	615,215	46.0
Upper	41	27.7	4,763	40.7	15,561	31.8	434,892	32.5
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	148	100.0	11,695	100.0	48,950	100.0	1,338,018	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 1.4% and 18.4% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, in 2009, bank lending to businesses in moderate-income tracts was comparable to both the 2009 aggregate lending level and D&B demographic demand proxies. Although the bank made no loans in low-income tracts, aggregate lending suggests modest demand in such tracts. During 2008, RBC extended .4% and 16.5% of small business loans in low-and moderate-income tracts, respectively which compared to aggregate lending for that year represents similar performance to that of 2009. Overall, the lending penetration of low- and moderate-income areas reflects a good distribution of small business loans for both years.

The overall geographic loan distribution within this assessment area is considered good given the institution's size, branch locations, effective demand for credit, and lending performance for both HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Orlando-Deltona-Daytona Beach, FL CSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(134)				Home Purchase (34,565)			
Low	6	4.5	458	1.7	2,616	7.6	222,348	3.8
Moderate	23	17.2	2,671	10.1	8,871	25.7	1,077,905	18.7
	(83)				Refinance (26,427)			
Low	9	10.8	846	5.1	1,797	6.8	180,585	3.9
Moderate	8	9.6	1,079	6.5	4,633	17.5	551,201	11.8
	(4)				Home Improvement (1,218)			
Low	1	25.0	37	22.8	119	9.8	4,785	4.6
Moderate	0	0.0	0	0.0	259	21.3	14,958	14.3
	(0)				Multi-Family (0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	16	7.2	1,341	3.1	4,532	7.3	407,718	3.9
Moderate	31	14.0	3,750	8.6	13,763	22.1	1,644,064	15.6
Middle	44	19.9	6,471	14.9	16,048	25.8	2,378,421	22.6
Upper	130	58.8	31,813	73.3	27,867	44.8	6,111,436	58.0
Total	221	100.0	43,375	100.0	62,210	100.0	10,541,639	100.0
Unknown	0		0		12,711		2,287,820	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

The bank's home purchase and home refinance lending is considered adequate compared to the aggregate data. Marginal lending to low-income borrowers for home purchase loans is tempered by adequate lending to moderate-income borrowers. Weak performance relative to moderate-income borrowers in the case of refinance lending is offset by a good performance for low-income borrowers. When considering the bank's performance of all loan types on a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (18.4%), but is consistent with the aggregate reporter level. Bank lending to moderate-income borrowers lags the percentage of moderate-income area families (19%) as well as the aggregate reporter lending level and is considered adequate. The bank's performance during 2009 is considered adequate and its performance during 2008 is substantially similar.

Distribution of Lending by Loan Amount and Size of Business

Orlando-Deltona-Daytona Beach, FL CSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
\$1 Million or Less	105	70.9	6,519	55.7	9,067	18.3	379,254	28.1
Over \$1 Million	42	28.4	5,151	44.0	NA	NA	NA	NA
Unknown	1	0.7	25	0.2	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	125	84.5	2,544	21.8	47,294	95.5	502,245	37.2
\$100,001-\$250,000	12	8.1	2,371	20.3	1,024	2.1	184,398	13.6
\$250,001-\$1 Million	11	7.4	6,780	58.0	1,217	2.5	664,771	49.2
Total	148	100.0	11,695	100.0	49,535	100.0	1,351,414	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 18.3% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 91.2% of all businesses have revenues that do not exceed \$1 million per year. Excluding large credit card lenders from aggregate lending, in 2009, 52.4% of reported small business loans were to businesses having revenues of \$1 million or less. With 70.9% of the bank’s small business loans to businesses with annual revenues of \$1 million or less, its lending performance is considered excellent. RBC’s 2008 performance was not as strong as its 2009 performance. In 2008, 62.6% of the bank’s small business loans were made to businesses with revenues of \$1 million or less, while lending to borrowers in that revenue category reported by traditional lenders (excluding the credit card lenders) equaled 53.1%. This level of lending is considered good. Given the significantly higher dollar volume of loans originated in 2008, greater weight is placed on this performance, and overall, the bank’s small business lending to businesses with different revenues is considered good.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered adequate using aggregate data and area demographics as proxies for demand.

Community Development Lending:

In addition to community development loans extended at the statewide and multistate level, the bank originated four community development loans totaling approximately \$327,000 within this assessment area. The loans primarily provided funding for affordable housing projects within market. RBC has made an adequate level of community development loans in this assessment area.

INVESTMENT TEST

As previously noted, the bank has a qualified investment totaling \$2.5 million that benefits the statewide area that includes this assessment area. This investment is a mortgage-backed security. RBC has also provided \$2,500 in qualified donations during the evaluation period. The bank’s investment performance for this assessment area is considered adequate.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered adequate. Systems for delivering retail banking are accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 27 branch offices within this assessment area. Three of the branches (11.1%) are located in moderate-income areas. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering 2000 census data that indicates that 1.2% and 18.9% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in an adequate level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Orlando-Deltona-Daytona Beach, FL CSA assessment area:

- Business Professional Women (community services)
- Hispanic Chamber of Commerce (small business development)
- Junior Achievement (financial education for schools with a high low- and moderate-income enrollment)
- Ormond Beach Chamber of Commerce (small business development)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MIAMI-FORT LAUDERDALE- POMPANO BEACH, FLORIDA MSA

This assessment area includes all of the Miami-Fort Lauderdale-Pompano Beach, Florida MSA and has a population of 5 million. The bank operates 14 branches within this market area. As of June 2009, RBC ranked 29th in deposit market share having .41% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., Bank of America, NA., and SunTrust accounting for a deposit market share of 40.2%. According to 2009 aggregate loan data, RBC ranked 68th in reported residential mortgage loans and 45th in reported small business loans. The aggregate data include 815 residential mortgage loan and 183 small business loan reporters. Both market share rankings consider originated and purchased loans.

The assessment area has a median housing value of \$109,982 according to 2000 census data. The MSA's owner-occupancy rate of 58.5% is lower than the state's rate of 60.8%. The MSA's family poverty rate of 10.8% is greater than the overall state's rate of 9%. The 2008, 2009, and 2010 estimated median family income for the Miami-Miami Beach-Kendall portion of the MSA was \$49,200, \$50,800, and \$52,200, respectively. The 2008, 2009, and 2010 estimated median family income for the Fort Lauderdale-Pompano Beach-Deerfield Beach portion of the MSA was \$64,000, \$65,400, and \$66,200, respectively. The 2008, 2009, and 2010 estimated median family income for the West Palm Beach-Boca Raton-Boynton Beach portion of the MSA was \$66,000, \$67,600, and \$67,600, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Miami-Fort Lauderdale-Pompano Beach, FL MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	54	6.1	46,198	3.6	17,860	38.7	274,382	21.6
Moderate	241	27.0	335,999	26.4	61,383	18.3	225,945	17.8
Middle	320	35.9	483,877	38.0	41,157	8.5	250,182	19.7
Upper	271	30.4	406,370	31.9	16,717	4.1	521,935	41.0
NA	5	0.6	0	0.0	0	0.0		
Total	891	100.0	1,272,444	100.0	137,117	10.8	1,272,444	100.0
	Owner Occupied Units by Tract	Households						
		HHs by Tract		HHs < Poverty by Tract		HHs by HH Income		
		#	%	#	%	#	%	
Low	17,635	1.4	72,256	3.8	30,113	41.7	459,323	24.1
Moderate	284,505	22.6	537,430	28.2	109,907	20.5	308,057	16.2
Middle	503,653	40.0	731,613	38.4	78,359	10.7	342,926	18.0
Upper	452,189	35.9	565,161	29.6	35,343	6.3	796,154	41.8
NA	0	0.0	0	0.0	0	0.0		
Total	1,257,982	100.0	1,906,460	100.0	253,722	13.3	1,906,460	100.0
	Total Businesses by Tract	Businesses by Tract and Revenue Size						
		Less than or = \$1 Million		Over \$1 Million		Revenue not Reported		
		#	%	#	%	#	%	
Low	15,799	4.2	13,550	4.0	1,278	6.2	971	5.9
Moderate	82,082	21.8	72,877	21.4	5,076	24.6	4,129	24.9
Middle	134,694	35.7	121,970	35.9	6,928	33.5	5,796	35.0
Upper	143,702	38.1	130,905	38.5	7,195	34.8	5,602	33.8
NA	1,098	0.3	843	0.2	175	0.8	80	0.5
Total	377,375	100.0	340,145	100.0	20,652	100.0	16,578	100.0
Percentage of Total Businesses:				90.1		5.5		4.4

*NA-Tracts without household or family income as applicable

While the local economy is heavily reliant on tourism, diversity is provided by way of a manufacturing base and service trades. Major area employers include Public school systems, American Airlines, Precision Response Corporation, and Florida Power & Light Company. The local economy reflects weakness as evidenced by the unemployment rates for the three prior years presented in the following table:

	June 2008	June 2009	June 2010
Miami-Fort Lauderdale-Pompano Beach, FL MSA	6.1%	10.8%	11.7%
Florida	6.1%	10.5%	11.4%

A community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact identified the significant increases in the number of foreclosures within the area as having a highly detrimental impact on the area's economy. According to the contact, this has left an impression that local financial institutions could play a bigger role in helping to address this problem.

Available performance context information indicates that local opportunities are readily available for community development loans and investments within the market area. Given the bank's strategy and capacity, RBC faces no constraints in helping to meet community development needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered excellent. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (1.4%) and dollar volume (1.7%), is below the percentage of branch offices (3.2%) and deposits (3.4%) in the assessment area and is considered adequate. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Miami-Fort Lauderdale-Pompano Beach, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(96)				Home Purchase (60,888)			
Low	0	0.0	0	0.0	1,318	2.2	210,484	1.7
Moderate	17	17.7	2,281	9.2	10,834	17.8	1,486,378	11.9
	(38)				Refinance (49,142)			
Low	0	0.0	0	0.0	543	1.1	94,286	0.8
Moderate	3	7.9	346	4.6	6,031	12.3	934,461	8.4
	(0)				Home Improvement (2,003)			
Low	0	0.0	0	0.0	19	0.9	1,728	0.6
Moderate	0	0.0	0	0.0	299	14.9	20,641	7.6
	(0)				Multi-Family (153)			
Low	0	0.0	0	0.0	18	11.8	42,675	6.8
Moderate	0	0.0	0	0.0	70	45.8	213,872	34.1
	HMDA Totals							
Low	0	0.0	0	0.0	1,898	1.7	349,173	1.4
Moderate	20	14.9	2,627	8.1	17,234	15.4	2,655,352	10.8
Middle	50	37.3	10,872	33.6	40,166	35.8	7,222,374	29.4
Upper	64	47.8	18,890	58.3	52,688	47.0	14,268,193	58.1
NA*	0	0.0	0	0.0	200	0.2	48,312	0.2
Total	134	100.0	32,389	100.0	112,186	100.0	24,543,404	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market, for both the bank and in aggregate, home purchase transactions are the major HMDA lending category both by number and dollar volume of loans. Refinance loans ranked second. The bank made no home improvement or multi-family loans and the aggregate volume of such lending was modest. RBC's home purchase lending is considered good, while refinance lending is adequate. As reflected in the preceding table, overall, the bank's performance in low-income tracts is lower than the 2009 aggregate lending level and the percentage of owner-occupied housing units in that tract (1.4%). In moderate-income tracts, the bank's performance is comparable to aggregate lenders in the market though it lags the percentage of owner-occupied housing units (22.6%) within the market. Nonetheless, compared to the proxies for demand this level of lending is considered good. The bank's 2008 performance was much stronger and is considered excellent. RBC extended 10.1% and 24.7% of HMDA loans in low- and moderate-income tracts, respectively, exceeding aggregate performance considerably. Overall, the bank's lending performance is deemed excellent weighting performance for each year according to 2009 (\$32.4 million) and 2008 (\$29.4 million) HMDA lending volume.

Distribution of Small Business Loans by Income Level of Census Tract

Miami-Fort Lauderdale-Pompano Beach, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	2	4.1	45	1.7	3,935	3.5	185,452	5.7
Moderate	12	24.5	615	23.8	20,639	18.2	643,505	19.7
Middle	20	40.8	1,529	59.1	39,094	34.4	1,069,523	32.7
Upper	15	30.6	397	15.4	49,717	43.7	1,351,491	41.3
NA*	0	0.0	0	0.0	317	0.3	20,075	0.6
Total	49	100.0	2,586	100.0	113,702	100.0	3,270,046	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 4.2% and 21.8% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, in 2009, bank lending to businesses in both low- and moderate-income tracts exceeded both the 2009 aggregate lending level and D&B demographic demand proxies, and is considered excellent. This performance is slightly better than the bank’s 2008 performance level in which 2.9% and 21.4% of its small business lending was in low- and moderate-income areas, respectively. This lending compared favorably to aggregate lending for that year and this performance is considered good. Overall, given the greater dollar volume of lending in 2008 and the corresponding greater weight given to that performance, the bank’s geographic distribution performance is considered good.

With greater weight given to HMDA lending due to its comparatively higher dollar volume, the overall geographic loan distribution within this assessment area is considered excellent. Considered in arriving at this conclusion was the institution’s size, branch locations, effective demand for credit, and lending performance for the bank’s HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Miami-Fort Lauderdale-Pompano Beach, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(96)				Home Purchase (50,972)			
Low	3	3.1	238	1.0	2,669	5.2	212,313	2.0
Moderate	9	9.4	1,158	4.7	9,943	19.5	1,195,477	11.0
	(38)				Refinance (39,014)			
Low	2	5.3	155	2.0	2,058	5.3	262,557	3.0
Moderate	12	31.6	1,419	18.8	4,915	12.6	614,717	7.0
	(0)				Home Improvement (1,891)			
Low	0	0.0	0	0.0	102	5.4	4,975	2.0
Moderate	0	0.0	0	0.0	289	15.3	18,614	7.4
	(0)				Multi-Family (0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	5	3.7	393	1.2	4,829	5.3	479,845	2.4
Moderate	21	15.7	2,577	8.0	15,147	16.5	1,828,808	9.2
Middle	20	14.9	2,895	8.9	20,983	22.8	3,331,210	16.7
Upper	88	65.7	26,524	81.9	50,918	55.4	14,280,671	71.7
Total	134	100.0	32,389	100.0	91,877	100.0	19,920,534	100.0
Unknown	0		0		20,309		4,622,870	

() represents the total number of bank loans for the specific Loan Purpose where income is known
Percentage's (%) are calculated on all loans where incomes are known

According to demographic data, 21.6% and 17.8% of families are low- and moderate-income, respectively. The bank's lending performance varied across the two major products, home purchase transactions and refinance loans. Home purchase lending to both low- and moderate-income borrowers is considered poor when considering demographic and aggregate lending as proxies for demand. On the other hand, refinance lending is considered excellent, especially lending to moderate-income borrowers. During 2009, the bank's overall performance is considered good. Performance in 2008 was slightly better when comparing bank lending to the aggregate and is also considered good.

Distribution of Lending by Loan Amount and Size of Business

Miami-Fort Lauderdale-Pompano Beach, FL MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
\$1 Million or Less	33	67.3	1,088	42.1	23,156	20.2	810,550	24.7
Over \$1 Million	15	30.6	1,488	57.5	NA	NA	NA	NA
Unknown	1	2.0	10	0.4	NA	NA	NA	NA
by Loan Size	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
\$100,000 or less	44	89.8	1,154	44.6	108,767	94.8	1,065,224	32.4
\$100,001-\$250,000	3	6.1	570	22.0	2,776	2.4	500,739	15.2
\$250,001-\$1 Million	2	4.1	862	33.3	3,137	2.7	1,722,125	52.4
Total	49	100.0	2,586	100.0	114,680	100.0	3,288,088	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 90.1% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending indicates that the effective demand for credit for smaller businesses is much less. Gauging lending by traditional lenders after excluding large credit card lenders from the aggregate reveals that for 2009, 43.9% of reported small business loans were to businesses having revenues of \$1 million or less. Compared to proxies for demand, and considering performance context, the bank's level of lending is considered excellent. The bank's performance during 2008 was substantially similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered good using aggregate data and area demographics as proxies for demand and placing greater weight on HMDA lending due to its greater dollar volume.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans and cannot also be reported as community development loans. The absence of lending in this particular assessment area, however, does not warrant a lower overall lending performance assessment in light of the volume and distribution of other types of lending.

INVESTMENT TEST

As previously noted, the bank has a qualified investment totaling \$2.5 million that benefit a statewide area that includes this assessment area. This assessment area has benefited from a \$4.9 million investment in an LIHTC project through Apollo Equity Partners. RBC has also provided \$25,000 in qualified donations during the evaluation period. The bank has provided a significant level of qualified investments within the assessment area.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered adequate. Systems for delivering retail banking are accessible to essentially all portions of the assessment area, including low- and moderate-income areas. Participation in a community development services is limited.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 14 branch offices within this assessment area. Two of the branches (14.3%) are located in moderate-income areas. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering 2000 census data that indicates that 3.6% and 26.4% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

Participation in community development projects that benefit the local community is limited. An employee provides financial literacy classes to local residents of the community.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN PALM BAY-MELBOURNE-TITUSVILLE, FLORIDA MSA

This assessment area includes the entire Palm Bay-Melbourne-Titusville, Florida MSA and has a population of 476,230. The bank operates six branches within this market area. As of June 2009, RBC ranked 12th in deposit market share having 1.8% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., Bank of America, NA., and SunTrust Bank accounting for a deposit market share of 56.2%. According to 2009 aggregate loan data, RBC ranked 27th in reported residential mortgage loans and 23rd reported small business loans. The aggregate data include 338 residential mortgage loan and 61 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value as of 2000 was \$87,587 and the MSA's owner-occupancy rate of 66.6% is higher than the state's rate of 60.8%. The MSA's family poverty rate of 6.8% is less than the overall state's rate of 9%. The 2008, 2009, and 2010 estimated median family incomes for the Pam Bay-Melbourne-Titusville, FL MSA equaled \$61,300, \$62,200, and \$62,900, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Palm Bay-Melbourne-Titusville, FL MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	2.2	1,513	1.1	518	34.2	24,432	18.3
Moderate	19	20.7	24,073	18.0	3,154	13.1	25,775	19.3
Middle	44	47.8	67,393	50.5	4,121	6.1	30,261	22.7
Upper	27	29.3	40,410	30.3	1,263	3.1	52,921	39.7
NA	0	0.0	0	0.0	0	0.0		
Total	92	100.0	133,389	100.0	9,056	6.8	133,389	100.0
	Owner Occupied Units by Tract	Households						
		HHs by Tract		HHs < Poverty by Tract		HHs by HH Income		
		#	%	#	%	#	%	
Low	918	0.6	2,509	1.3	985	39.3	42,588	21.5
Moderate	26,243	17.7	41,632	21.0	6,513	15.6	35,105	17.7
Middle	73,591	49.8	98,886	49.8	7,716	7.8	39,960	20.1
Upper	47,126	31.9	55,344	27.9	2,844	5.1	80,718	40.7
NA	0	0.0	0	0.0	0	0.0		
Total	147,878	100.0	198,371	100.0	18,058	9.1	198,371	100.0
	Total Businesses by Tract	Businesses by Tract and Revenue Size						
		Less than or = \$1 Million		Over \$1 Million		Revenue not Reported		
		#	%	#	%	#	%	
Low	372	1.2	335	1.1	25	1.7	12	1.0
Moderate	7,319	22.7	6,487	21.9	467	31.5	365	31.5
Middle	14,895	46.2	13,747	46.5	630	42.5	518	44.8
Upper	9,625	29.9	9,002	30.4	361	24.3	262	22.6
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	32,211	100.0	29,571	100.0	1,483	100.0	1,157	100.0
Percentage of Total Businesses:				91.8		4.6		3.6

*NA-Tracts without household or family income as applicable

This market economy is dependent on tourism, high-technology and the service industries. Major employers in the area include Harris Corporation, Intersil, Wal-Mart, and Palm Bay Community Hospital. Continued economic weakness is reflected in the unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Palm Bay-Melbourne-Titusville, FL MSA	6.2%	10.5%	11.4%
Florida	6.1%	10.5%	11.4%

Contact was made with an area official knowledgeable of area economic conditions. The contact identified small business lending as needed in the community. The official also noted a need for more small business education programs such as business plan development. Overall, the contact indicated that given economic conditions, area institutions are generally supportive of the local community.

Available performance context information, including review of CRA public evaluations for other institutions serving this assessment area suggests that local opportunities are reasonably available for community development loans and investments within the market area. Given the bank's strategy and capacity, RBC faces no constraints in community development endeavors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered marginally adequate. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (.9%) and dollar volume (.8%) is consistent with the percentage of branch offices (1.4%) and deposits (.7%) in the assessment area and is considered good. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Palm Bay-Melbourne-Titusville, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(87)				(8,577)			
Low	0	0.0	0	0.0	17	0.2	713	0.1
Moderate	4	4.6	549	3.7	853	9.9	85,211	6.9
	(43)				(7,876)			
Low	0	0.0	0	0.0	10	0.1	704	0.1
Moderate	1	2.3	50	0.6	621	7.9	81,315	6.3
	(0)				(316)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	34	10.8	2,578	9.2
	(0)				(4)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	1	25.0	1,400	15.9
	HMDA Totals							
Low	0	0.0	0	0.0	27	0.2	1,417	0.1
Moderate	5	3.8	599	2.5	1,509	9.0	170,504	6.7
Middle	77	59.2	12,253	52.1	9,176	54.7	1,245,156	48.8
Upper	48	36.9	10,644	45.3	6,061	36.1	1,136,647	44.5
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	130	100.0	23,496	100.0	16,773	100.0	2,553,724	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

RBC’s performance for both home purchase and refinance lending is considered poor. While no loans were originated by the bank in low-income census tracts in either 2008 or 2009, aggregate lending evidences that the effective demand for credit is severely limited in such tracts. Furthermore, only .6% of owner-occupied housing units are located in these tracts. Aggregate lending suggests that there is viable demand for credit in moderate-income tracts; however, the bank’s lending is markedly lower than both the 2009 aggregate lending level and the percentage of owner-occupied housing units in those tracts (17.7%). The bank’s 2008 performance was better, with 10.8% of HMDA lending in moderate-income tracts; but, lending volume for 2008 (\$6 million) was much less than in 2009 (\$23.5 million) and the bank’s performance overall is considered poor.

Distribution of Small Business Loans by Income Level of Census Tract

Palm Bay-Melbourne-Titusville, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	0	0.0	0	0.0	130	1.2	3,352	1.3
Moderate	6	20.0	80	10.5	2,300	22.1	73,593	28.0
Middle	21	70.0	641	84.3	4,528	43.5	104,092	39.6
Upper	3	10.0	39	5.1	3,450	33.1	81,770	31.1
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	30	100.0	760	100.0	10,408	100.0	262,807	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 1.2% and 22.7% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, bank lending to businesses in moderate-income tracts is comparable to both the 2009 aggregate lending level and D&B demographic demand proxies. Though the bank did not originate any loans within the two low-income tracts, given the relatively limited demand (as evidenced by both the aggregate lending level and the demographic demand proxy), overall, its performance is considered good. This performance level is substantially similar to the bank’s 2008 performance.

Significantly greater weight is placed on HMDA lending due to its much greater dollar volume. The overall geographic loan distribution within this assessment area is considered poor given the institution’s size, branch locations, effective demand for credit, and the bank’s lending performance for HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Palm Bay-Melbourne-Titusville, FL MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(87)				(7,549)			
Low	5	5.7	472	3.2	1,022	13.5	77,691	7.0
Moderate	10	11.5	1,304	8.7	1,902	25.2	209,079	19.0
	(43)				(6,194)			
Low	1	2.3	115	1.3	563	9.1	53,075	5.3
Moderate	14	32.6	1,760	20.6	1,100	17.8	120,529	12.1
	(0)				(306)			
Low	0	0.0	0	0.0	34	11.1	1,497	5.5
Moderate	0	0.0	0	0.0	68	22.2	4,329	16.0
	(0)				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	6	4.6	587	2.5	1,619	11.5	132,263	6.2
Moderate	24	18.5	3,064	13.0	3,070	21.9	333,937	15.7
Middle	32	24.6	5,609	23.9	3,630	25.8	497,363	23.4
Upper	68	52.3	14,236	60.6	5,730	40.8	1,159,238	54.6
Total	130	100.0	23,496	100.0	14,049	100.0	2,122,801	100.0
<i>Unknown</i>	0		0		2,724		430,923	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

RBC's level of home purchase lending is considered poor to both low- and moderate-income borrowers when compared to aggregate lending levels. Bank performance for refinance lending is good due to an excellent level of lending to moderate-income borrowers offsetting a poor level of lending to low-income borrowers. When considering the bank's performance for all loan types on a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (18.3%) as well the aggregate reporter level and is considered poor. Bank lending to moderate-income borrowers is consistent with both the percentage of moderate-income area families (19.3%) and the aggregate reporter level and is considered good. The bank's performance during 2009 is considered adequate overall. Its performance during 2008 is also considered adequate with excellent performance in lending to low-income borrowers at 13.5%, while lending to moderate-income borrowers at 8.1% was considerably weaker.

Distribution of Lending by Loan Amount and Size of Business

Palm Bay-Melbourne-Titusville, FL MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	25	83.3	684	90.0	1,953	18.6	84,938	32.1
Over \$1 Million	5	16.7	76	10.0	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	29	96.7	435	57.2	10,063	95.7	103,834	39.3
\$100,001-\$250,000	0	0.0	0	0.0	211	2.0	37,823	14.3
\$250,001-\$1 Million	1	3.3	325	42.8	240	2.3	122,746	46.4
Total	30	100.0	760	100.0	10,514	100.0	264,403	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data indicates that 91.8% of all local businesses have revenues that do not exceed \$1 million per year; however, as reflected in the preceding table, aggregate lending indicates that the effective demand for credit for smaller businesses is much less. In this particular market, aggregate data includes significant lending by credit card lenders. For this reason, lending by traditional bank reporters, excluding card lenders, was also considered in addition to the overall aggregate. According to the 2009 data, 50.2% of small business loans made by such reporters were to businesses having revenues of \$1 million or less. Revenues were either unknown or in excess of \$1 million for the remaining portion of loans. Compared to these proxies for demand, the bank’s level of lending is considered excellent. The bank’s performance during 2008 was similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered adequate using aggregate data and area demographics as proxies for demand. Despite good small business lending performance, HMDA lending performance is given significantly greater weight and overall is considered marginally adequate, largely due to weak geographic lending performance for such lending.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans and cannot also be reported as community development loans. The absence of such loans in this particular assessment area, however, does not warrant a lower overall lending performance assessment in light of the volume and distribution of other types of lending and community development lending.

INVESTMENT TEST

During the review period, the bank donated \$4,000 in qualified donations in this specific market. Considering investments that support community development initiatives that benefit the statewide area including this MSA, performance in this assessment area is considered adequate.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered adequate. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and an employee participated in a community development project.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates six branch offices within this assessment area. Two of the branches (33.3%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 1.1% and 18% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank has limited community development activities that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entity within the Palm Bay-Melbourne-Titusville, FL MSA assessment area:

- United Way of Brevard County (community services)

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF FLORIDA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. In the case where the performance was considered below, the performance was at least adequate for the assessment area.

Assessment Area	Lending Test	Investment Test	Service Test
Cape Coral-Fort Myers MSA	Below	Below	Consistent
Gainesville MSA	Consistent	Below	Consistent
Naples-Marco Island MSA	Below	Below	Consistent
Ocala MSA	Below	Below	Consistent
Panama City-Lynn Haven MSA	Below	Below	Consistent
Pensacola-Ferry Bass-Brent MSA	Consistent	Below	Consistent
Port St. Lucie-Debastian-Vero Beach CSA	Consistent	Below	Consistent
Sarasota-Bradenton-Punta Gorda CSA	Below	Below	Consistent
Tampa-St. Petersburg-Clearwater MSA	Exceeds	Below	Consistent

STATE

CRA RATING FOR SOUTH CAROLINA⁶: S SATISFACTORY

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- While varying by product, geographic and borrower distribution are considered adequate overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- The bank maintains a significant level of qualified investments that benefit statewide and regional areas.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A relatively high level of participation in qualified community development services that generally benefit affordable housing was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are seven assessment areas within the State of South Carolina. The composition of each of these assessment areas is defined in **APPENDIX E** of this evaluation.

On a combined basis, the seven statewide assessment areas account for 6.3%, 1.8%, and 2.4% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the State of South Carolina was evaluated by reviewing the Charleston-North Charleston MSA, Myrtle Beach-North Myrtle Beach-Conway MSA, and the Columbia MSA assessment areas using full scope interagency examination procedures. In arriving at an overall state rating, individual assessment area performances were generally weighted by their dollar volume of lending. Therefore, the greatest weight was given to the performance of the Charleston-North Charleston-Summerville MSA assessment area. However, all markets were relatively similar in size of the lending, deposit and branch presence. For assessment areas subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA

The institution has eight branch offices located throughout the State of South Carolina and ranks 18th in deposit market share having 1% of the state's available FDIC insured deposits in the combined markets where the bank has branches (credit union deposits are not included). No offices are located in low-income areas and two (25%) are located in moderate-income areas. The bank holds approximately \$437.3 million in deposits within the statewide area.

Based on 2000 census data, the South Carolina assessment areas have a total population of approximately 1.7 million, including 455,644 families. A majority of the families are middle- and upper-income (63.6%), while low- and moderate-income families comprise 19.4% and 16.9% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 58.5%, and 9.5% of families live below the poverty level. The 2008, 2009, and 2010 median family incomes for MSAs are provided in their respective market as necessary.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

Overall, the statewide lending test is rated low satisfactory. Of the three markets reviewed with full scope procedures, the greatest weight was given to the performance within the Charleston-North Charleston-Summerville, SC MSA assessment area, as the largest dollar volume of loans (26.6%) were extended within this assessment area for the statewide area. Lending activity is considered adequate and is measured primarily by market share. The lending distributions and provision of community development loans are considered good.

Lending Activity:

Overall, lending activity is considered good and consistent with the bank's capacity. According to 2009 market share data, the bank ranks 28th and 37th in small business/farm and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's distribution of lending is considered adequate. Lending performance varies by both product and market. When reaching overall conclusions, HMDA lending performance primarily received the most weight as the category typically accounted for significantly more volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank extended a relatively high level of lending by dollar volume that qualifies as community development loans. Two community development loans originated totaling \$2.7 million (one for \$2.65 million and one for \$50,000) were originated in two of the bank's assessment areas within the state and are discussed as part of the evaluation of the lending test for each respective market. During the evaluation period, RBC funded one loan totaling \$258,000 in South Carolina outside of any of the bank's assessment areas. The loans facilitated affordable housing projects within the state.

INVESTMENT TEST

The institution's level of qualified investments benefiting South Carolina is considered low satisfactory. The institution holds affordable mortgage backed securities totaling \$464,000 that benefit the statewide area of South Carolina. Additionally, during the evaluation period, the bank made donations of approximately \$22,500 to organizations providing community development services on a statewide basis.

SERVICE TEST

The statewide rating for the institution under the service test is high satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the South Carolina markets are representative of those offered by the institution overall. The bank's community development services generally benefit specific markets and are discussed in the relevant market.

METROPOLITAN AREAS

*(For metropolitan areas with some or all assessment areas
reviewed using full-scope review)*

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHARLESTON-NORTH
CHARLESTON-SUMMERVILLE, SOUTH CAROLINA MSA**

This assessment area includes a portion of the Charleston-North Charleston-Summerville, South Carolina MSA and has a population of 309,969. The bank operates two branches within this market area. As of June 2009, RBC ranked 18th in deposit market share having .8% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., First FS&LA of Charleston, and Bank of America, NA., accounting for a deposit market share of 54.4%. According to 2009 aggregate loan data, RBC ranked 38th in reported residential mortgage loans and 24th in reported small business loans. The aggregate data include 434 residential mortgage loan and 60 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value as of 2000 was \$117,729 and the assessment area's owner-occupancy rate of 53.4% is lower than the state's rate of 63.2% and the MSA's rate of 59.4%. The market's family poverty rate of 12.4% is higher than the overall state's rate of 10.7% and the MSA's rate of 10.7%. The 2008, 2009, and 2010 estimated median family incomes for the MSA equaled \$58,400, \$60,300, and \$62,100, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Charleston-North Charleston-Summerville, SC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	11	14.1	6,560	8.4	2,720	41.5	17,931	23.1
Moderate	21	26.9	15,746	20.3	2,869	18.2	12,886	16.6
Middle	23	29.5	25,908	33.3	2,793	10.8	14,543	18.7
Upper	23	29.5	29,530	38.0	1,261	4.3	32,384	41.7
NA	0	0.0	0	0.0	0	0.0		
Total	78	100.0	77,744	100.0	9,643	12.4	77,744	100.0
	Owner Occupied Units by Tract	Households						
		HHs by Tract		HHs < Poverty by Tract		HHs by HH Income		
		#	%	#	%	#	%	#
Low	3,342	4.4	11,109	9.0	4,554	41.0	31,475	25.5
Moderate	12,878	17.1	25,635	20.8	5,780	22.5	20,200	16.4
Middle	25,911	34.4	42,587	34.6	5,778	13.6	22,030	17.9
Upper	33,160	44.0	43,929	35.6	2,970	6.8	49,555	40.2
NA	0	0.0	0	0.0	0	0.0		
Total	75,291	100.0	123,260	100.0	19,082	15.5	123,260	100.0
	Total Businesses by Tract	Businesses by Tract and Revenue Size						
		Less than or = \$1 Million		Over \$1 Million		Revenue not Reported		
		#	%	#	%	#	%	#
Low	1,408	6.9	1,189	6.6	114	9.5	105	9.7
Moderate	3,707	18.2	3,136	17.4	316	26.4	255	23.7
Middle	6,486	31.9	5,795	32.1	362	30.2	329	30.5
Upper	8,739	43.0	7,946	44.0	405	33.8	388	36.0
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	20,340	100.0	18,066	100.0	1,197	100.0	1,077	100.0
Percentage of Total Businesses:				88.8		5.9		5.3

*NA-Tracts without household or family income as applicable

The local economy is based on the military, service, and manufacturing industries. Major area employers include the US Navy, US Air Force, Medical University of South Carolina, and local area school districts. Despite a significant increase in the unemployment rate, the jobless rate has begun to moderate recently. The unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Charleston-North Charleston-Summerville, SC MSA	5.6%	10.3%	9.3%
South Carolina	6.5%	11.9%	11.1%

One community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact indicated that local financial institutions are generally supportive of the local community but that additional financing, particularly for small businesses, was a primary credit need in the area.

Overall, available performance context information suggests that local opportunities are reasonably available for community development loans and investments within the market area. Many of the bank's competitors in this market have a larger market presence; nonetheless, RBC faces few constraints in pursuing community development endeavors relative to its market presence.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered adequate. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (.8%) and dollar volume (1.7%), is consistent with the percentage of branch offices (.5%) and deposits (.3%) in the assessment area and is considered good. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Charleston-North Charleston-Summerville, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(24) Home Purchase				(6,408)			
Low	0	0.0	0	0.0	150	2.3	25,967	1.6
Moderate	2	8.3	453	5.0	641	10.0	103,886	6.6
	(59) Refinance				(13,104)			
Low	2	3.4	384	2.6	182	1.4	34,167	1.0
Moderate	3	5.1	749	5.1	1,058	8.1	199,865	5.9
	(1) Home Improvement				(351)			
Low	0	0.0	0	0.0	19	5.4	663	1.5
Moderate	1	100.0	134	100.0	50	14.2	3,742	8.4
	(1) Multi-Family				(24)			
Low	1	100.0	1,400	100.0	7	29.2	12,383	27.8
Moderate	0	0.0	0	0.0	5	20.8	9,685	21.8
	HMDA Totals							
Low	3	3.5	1,784	7.0	358	1.8	73,180	1.5
Moderate	6	7.1	1,336	5.2	1,754	8.8	317,178	6.3
Middle	17	20.0	3,222	12.7	5,641	28.4	1,070,730	21.2
Upper	59	69.4	19,117	75.1	12,134	61.0	3,582,103	71.0
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	85	100.0	25,459	100.0	19,887	100.0	5,043,191	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within this market, refinance loans were the primary HMDA lending category for both the bank and aggregate reporters. Home purchase loans accounted for the next largest lending volume while both home improvement and multi-family lending was nominal. Despite weaker relative performance for lending in moderate-income tracts in the case of refinancings, as reflected in the preceding table, the bank's overall performance in both low- and moderate-income tracts is comparable to the 2009 aggregate lending level. Though lagging the percentage of owner-occupied housing units in those tracts (4.4% and 17.1%, respectively), based on the effective demand suggested by aggregate lending, the bank's performance is considered good. This represents an improvement over the bank's 2008 very poor performance when 0% and 3.3% of HMDA lending was located in low- and moderate-income tracts, respectively. Overall, with slightly greater weight accorded to 2008 because of a greater dollar volume of lending, the bank's performance is considered poor.

Distribution of Small Business Loans by Income Level of Census Tract

Charleston-North Charleston-Summerville, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	0	0.0	0	0.0	603	7.2	31,027	7.0
Moderate	4	25.0	1,308	27.8	1,356	16.1	78,634	17.8
Middle	2	12.5	170	3.6	2,517	29.9	120,017	27.2
Upper	10	62.5	3,235	68.6	3,930	46.8	211,744	48.0
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	16	100.0	4,713	100.0	8,406	100.0	441,422	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 6.9% and 18.2% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, the bank made no loans in low-income tracts. Conversely, its lending in moderate-income tracts exceeds both the 2009 aggregate lending level and D&B demographic demand proxies and is considered good.

In 2008, the bank made 5.8% of its loans in low-income tracts and 9.6% in moderate-income tracts. This compares adequately with both the aggregate lending levels (5.1% and 14.5%, respectively) and the D&B data. Overall, greater weight is placed on 2008 performance due to greater dollar loan volume and the bank's geographic distribution of small business loans is considered adequate overall.

Greatest weight is placed on HMDA lending in reaching a conclusion regarding overall geographic loan distribution performance within this assessment area which is considered poor. This conclusion also considers performance context factor including the institution's size, branch locations, and the effective demand for credit.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Charleston-North Charleston-Summerville, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(24) Home Purchase				(5,806)			
Low	1	4.2	144	1.6	310	5.3	33,206	2.3
Moderate	2	8.3	317	3.5	1,208	20.8	171,660	11.9
	(59) Refinance				(11,102)			
Low	1	1.7	96	0.6	438	3.9	51,201	1.8
Moderate	10	16.9	1,529	10.3	1,430	12.9	207,080	7.2
	(1) Home Improvement				(346)			
Low	0	0.0	0	0.0	32	9.2	1,659	3.8
Moderate	0	0.0	0	0.0	68	19.7	4,942	11.2
	(0) Multi-Family				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	2	2.4	240	1.0	780	4.5	86,066	2.0
Moderate	12	14.3	1,846	7.7	2,706	15.7	383,682	8.8
Middle	14	16.7	2,878	12.0	3,633	21.1	665,079	15.2
Upper	56	66.7	19,095	79.4	10,135	58.7	3,241,397	74.1
Total	84	100.0	24,059	100.0	17,254	100.0	4,376,224	100.0
<i>Unknown</i>	<i>1</i>		<i>1,400</i>		<i>2,633</i>		<i>666,967</i>	

() represents the total number of bank loans for the specific Loan Purpose where income is known
Percentage's (%) are calculated on all loans where incomes are known

For 2009, refinance and home purchase loans represent the largest proportion of both bank and aggregate lending. The bank's refinance lending performance is considered good while the bank's home purchase lending is considered adequate. RBC only made one home improvement loan in 2009, and multi-family lending was not a factor in the analysis.

When considering the bank's performance for all loan types on a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (23.1%) as well as the aggregate reporter level. Lending to moderate-income borrowers is much better. Although lagging the percentage of moderate-income area families (16.6%), bank lending is consistent with the percentage of aggregate lending to moderate-income borrowers and is considered good. The bank's performance during 2008 is similar to 2009 data. Given the much higher effective demand for credit from moderate-income borrowers, the bank's performance is considered good.

Distribution of Lending by Loan Amount and Size of Business

Charleston-North Charleston-Summerville, SC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	6	37.5	2,255	47.8	1,964	23.1	202,790	45.8
Over \$1 Million	10	62.5	2,458	52.2	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	7	43.8	159	3.4	7,552	88.7	95,336	21.5
\$100,001-\$250,000	3	18.8	560	11.9	443	5.2	79,956	18.0
\$250,001-\$1 Million	6	37.5	3,994	84.7	515	6.1	267,863	60.4
Total	16	100.0	4,713	100.0	8,510	100.0	443,155	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

In 2009, 23.1% of aggregate small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 88.8% of all local businesses have revenues that do not exceed \$1 million per year. Excluding large credit card lenders, for 2009, 61% of reported small business loans were to businesses having revenues of \$1 million or less. Taking into account performance context, 2009 performance is considered adequate. This lending is lower than the bank’s level of lending in 2008, when 76.9% of its small business loans were made to companies with revenues of \$1 million or less and considered excellent. Overall, compared to the proxies for demand, and weighting the 2009 (\$4.7 million) and 2008 (\$10.7 million) performance based on lending volume, the bank’s level of lending is considered excellent.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered adequate using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank originated one community development loan totaling approximately \$2.65 million. This loan was for an economic development initiative. RBC has made a high level of community development loans in this market.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments, which support community development initiatives that benefit multistate, statewide, and regional areas including this MSA. The institution’s level of qualified investments benefiting the market includes one project funded through CAHEC. During the review period, the bank also donated \$10,000 in qualified donations in this market. Based upon these factors, investment test performance in this market is considered adequate.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates two branch offices within this assessment area. One of the branches (50%) is located in a moderate-income census tract. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 8.4% and 20.3% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. Examples include an employee providing financial literacy to area residents, and another employee provided financial counseling to residents applying for loans and grants that would benefit the needy in conjunctions with Trident Urban League, Homeownership Resource Center, and USDA Rural Development-Rural Housing Service.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MYRTLE BEACH-CONWAY-
NORTH MYRTLE BEACH, SOUTH CAROLINA MSA**

This assessment area includes the entire Myrtle Beach-Conway-North Myrtle Beach, South Carolina MSA and has a population of 196,629. The bank operates one branch within this market area. As of June 2009, RBC ranked 11th in deposit market share having 3.9% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with BB&TC, Conway National Bank, and Horry County State Bank accounting for a deposit market share of 35.5%. According to 2009 aggregate loan data, RBC ranked 29th in reported residential mortgage loans and 25th in reported small business loans. The aggregate data include 419 residential mortgage loan and 49 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value as of 2000 was \$95,417 and the MSA's owner-occupancy rate of 48.9% is lower than the state's rate of 63.2%. The MSA's family poverty rate of 8.4% is lower than the overall state's rate of 10.7%. The 2008, 2009, and 2010 estimated median family incomes for the MSA were \$50,400, \$52,400, and \$53,200, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Myrtle Beach-North Myrtle Beach-Conway, SC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	9,946	18.2
Moderate	7	16.3	6,461	11.8	1,031	16.0	10,697	19.5
Middle	27	62.8	39,016	71.2	3,211	8.2	12,545	22.9
Upper	9	20.9	9,300	17.0	333	3.6	21,589	39.4
NA	0	0.0	0	0.0	0	0.0		
Total	43	100.0	54,777	100.0	4,575	8.4	54,777	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	16,429	20.1
Moderate	5,805	9.7	10,060	12.3	2,119	21.1	14,788	18.1
Middle	43,069	72.1	55,934	68.4	6,046	10.8	17,626	21.6
Upper	10,825	18.1	15,791	19.3	972	6.2	32,942	40.3
NA	0	0.0	0	0.0	0	0.0		
Total	59,699	100.0	81,785	100.0	9,137	11.2	81,785	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2,048	14.6	1,789	14.3	136	18.9	123	16.0
Middle	8,710	62.3	7,938	63.5	375	52.2	397	51.8
Upper	3,222	23.0	2,767	22.1	208	28.9	247	32.2
NA	0	0.0	0	0.0	0	0.0	0	0.0
Total	13,980	100.0	12,494	100.0	719	100.0	767	100.0
Percentage of Total Businesses:				89.4		5.1		5.5

*NA-Tracts without household or family income as applicable

The local economy is based on tourism and vacation activities. Major area employers include the Horry Department of Education, Wal-Mart, and Coastal Carolina University. Elevated jobless rates are consistent with economic weakness observed nationally and throughout the state. The unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	5.8%	11%	10.3%
South Carolina	6.5%	11.9%	11.1%

One community contact was made within the MSA to discuss local economic conditions and community credit needs. The elevated unemployment rate was identified as the biggest economic impediment in the area, and the contact felt that increased access to small business loans would benefit the area the most. Despite the challenges of the area's economy, the contact indicated that local financial institutions remain supportive of the local community.

Performance context information suggests that local community development opportunities are limited for community development loans and investments within the market area. Many of the bank's competitors in this market have a larger market presence; nonetheless, RBC faces few constraints in pursuing community development endeavors relative to its market presence.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered poor. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (.9%) and dollar volume (1.5%), is consistent with the percentage of branch offices (.2%) and deposits (1.2%) in the assessment area and is considered good. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

There are no low-income census tracts within this assessment area.

Distribution of HMDA Loans by Income Level of Census Tract

Myrtle Beach-North Myrtle Beach-Conway, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(72)				(5,709)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	1.4	101	0.7	265	4.6	31,692	3.5
	(38)				(9,517)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	5.3	283	3.4	468	4.9	66,442	3.9
	(1)				(351)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0	0.0	40	11.4	2,308	7.8
	(0)				(23)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0	0.0	1	4.3	172	0.2
	HMDA Totals							
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	3	2.7	384	1.6	774	5.0	100,614	3.7
Middle	74	66.7	16,688	71.0	12,136	77.8	2,035,713	75.2
Upper	34	30.6	6,421	27.3	2,690	17.2	570,218	21.1
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	111	100.0	23,493	100.0	15,600	100.0	2,706,545	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Within the assessment area, 9.7% of all owner-occupied housing units are located in moderate-income census tracts. Home purchase and refinance loans are the primary HMDA products extended by both the bank and aggregate reporters. RBC's level of lending in moderate-income census tracts is considered good for refinance lending, while home purchase lending is considered poor. On a combined basis, the bank originated only 2.7% of its HMDA loans in moderate-income census tracts, while the aggregate reporters extended 5%. The bank's geographic distribution performance is considered poor for 2009 and its performance during 2008 is similar.

Distribution of Small Business Loans by Income Level of Census Tract

Myrtle Beach-North Myrtle Beach-Conway, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0	0.0	1,316	14.8	44,981	14.0
Middle	1	25.0	5	0.7	5,724	64.2	191,218	59.4
Upper	3	75.0	715	99.3	1,871	21.0	85,679	26.6
NA*	0	0.0	0	0.0	0	0.0	0	0.0
Total	4	100.0	720	100.0	8,911	100.0	321,878	100.0

*NA-Tracts without household or family income as applicable

During 2009, the bank originated no loans in moderate-income census tracts. Aggregate lenders originated (14.8%) of their loans in such tracts. Moderate-income tracts account for 14.6% of area businesses. However, the bank only originated four small business loans in this assessment area in 2009. The bank's level of lending for 2009 is considered poor. In 2008, the bank originated one loan in a moderate-income tract which represented 11.1% of its small business loans. Also in 2008, the aggregate lending level was 12.5%, which represents a good lending level. Overall, the bank's lending in moderate-income tracts is considered adequate.

The overall geographic loan distribution within this assessment area is considered poor given the institution's size, branch locations, effective demand for credit, and the bank's lending performance for its HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Myrtle Beach-North Myrtle Beach-Conway, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(71) Home Purchase				(5,167)			
Low	0	0.0	0	0.0	222	4.3	19,228	2.4
Moderate	3	4.2	356	2.4	805	15.6	90,573	11.1
	(35) Refinance				(8,161)			
Low	2	5.7	496	6.3	419	5.1	40,726	2.9
Moderate	4	11.4	410	5.2	1,155	14.2	131,432	9.2
	(1) Home Improvement				(334)			
Low	0	0.0	0	0.0	30	9.0	1,006	3.8
Moderate	0	0.0	0	0.0	62	18.6	3,899	14.7
	(0) Multi-Family				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	2	1.9	496	2.2	671	4.9	60,960	2.7
Moderate	7	6.5	766	3.3	2,022	14.8	225,904	10.0
Middle	14	13.1	2,007	8.7	3,215	23.5	447,465	19.7
Upper	84	78.5	19,716	85.8	7,754	56.8	1,535,291	67.6
Total	107	100.0	22,985	100.0	13,662	100.0	2,269,620	100.0
Unknown	4		508		1,938		436,925	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

RBC's home purchase lending to moderate-income borrowers is considered poor. Conversely, refinance lending in to such borrowers is good. Demographic data from the 2000 census indicates that within the assessment area, 18.2% and 19.5% of families are low- and moderate-income, respectively. Even considering the lower effective demand for credit suggested by aggregate lending, as reflected in the preceding table, RBC's overall lending to both low- and moderate-income borrowers is considered poor, as is the bank's 2008 performance which was similar.

Distribution of Lending by Loan Amount and Size of Business

Myrtle Beach-North Myrtle Beach-Conway, SC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	1	25.0	700	97.2	3,141	34.7	198,672	61.3
Over \$1 Million	2	50.0	10	1.4	NA	NA	NA	NA
Unknown	1	25.0	10	1.4	NA	NA	NA	NA
by Loan Size	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$100,000 or less	3	75.0	20	2.8	8,396	92.8	112,144	34.6
\$100,001-\$250,000	0	0.0	0	0.0	362	4.0	63,719	19.7
\$250,001-\$1 Million	1	25.0	700	97.2	288	3.2	148,072	45.7
Total	4	100.0	720	100.0	9,046	100.0	323,935	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

In 2009, 34.7% of aggregate small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 89.4% of all local businesses have revenues that do not exceed \$1 million per year. Limiting consideration to only traditional lenders by excluding large credit card lenders, in 2009, 84.8% of reported small business loans were to businesses having revenues of \$1 million or less. The bank's level of lending to business in this revenue range in 2009 (25%) is considered very poor and is much lower than the good performance in 2008 when 77.8% of its small business loans were made to companies with revenues of \$1 million or less. RBC's level of small business lending is considered good in 2008. Overall, compared to the proxies for demand, and weighting the 2009 and 2008 performance based on lending volume, the bank's level of lending is poor.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is consider poor using aggregate data and area demographics as proxies for demand.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans cannot also be reported as community development loans. The absence of such loans in this market while reflecting limited opportunities is also consistent with the overall poor lending performance in this market.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments, which support community development initiatives that benefit multistate, statewide, and regional areas including this MSA. Because the impact of statewide investments is dispersed across a wide geographic span, performance in this assessment area is considered adequate.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered adequate. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and an employee have participated in a community development service.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates one branch office within this assessment area. The branch location and business hours are considered convenient and meet the needs of the assessment area. The distribution of the branch is adequate when considering that, according to 2000 census data, 11.8% of the assessment area's families reside in moderate-income areas.

Community Development Services:

Relative to its market presence, the bank is an active participant in an adequate level of community development projects that benefit the local community. An employee serves on a community development corporation seeking to provide affordable housing in the assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLUMBIA, SOUTH CAROLINA MSA

This assessment area includes a portion of the Columbia, South Carolina MSA and has a population of 536,691. The bank operates one branch within this market area. As of June 2009, RBC ranked 18th in deposit market share having .5% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., Bank of America, NA., and Nation Bank of South Carolina accounting for a deposit market share of 58.8%. According to 2009 aggregate loan data, RBC ranked 34th in reported residential mortgage loans and 28th in reported small business loans. The aggregate data include 388 residential mortgage loan and 57 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value as of 2000 was \$94,020 and the assessment area's owner-occupancy rate of 62.5% is lower than the state's rate of 63.2% and the MSA's rate of 63.9%. The assessment area's family poverty rate of 8.4% is lower than the overall state's rate of 10.7% and the MSA's rate of 9.1%. The 2008, 2009, and 2010 estimated median family incomes for the MSA equaled \$59,200, \$62,100, and \$62,400, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Columbia, SC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	9	7.4	3,888	2.8	1,594	41.0	26,481	19.3
Moderate	33	27.3	31,486	23.0	5,035	16.0	23,479	17.1
Middle	42	34.7	50,161	36.6	3,414	6.8	29,913	21.8
Upper	35	28.9	51,514	37.6	1,516	2.9	57,176	41.7
NA	2	1.7	0	0.0	0	0.0		
Total	121	100.0	137,049	100.0	11,559	8.4	137,049	100.0
	Owner Occupied Units by Tract	Households						
		HHs by Tract		HHs < Poverty by Tract		HHs by HH Income		
		#	%	#	%	#	%	
Low	1,647	1.2	7,125	3.5	3,189	44.8	44,041	21.7
Moderate	28,858	20.9	49,800	24.5	8,832	17.7	33,580	16.5
Middle	50,959	36.9	75,592	37.2	7,064	9.3	39,685	19.5
Upper	56,562	41.0	70,718	34.8	3,993	5.6	86,091	42.3
NA	7	0.0	162	0.1	46	28.4		
Total	138,033	100.0	203,397	100.0	23,124	11.4	203,397	100.0
	Total Businesses by Tract	Businesses by Tract and Revenue Size						
		Less than or = \$1 Million		Over \$1 Million		Revenue not Reported		
		#	%	#	%	#	%	
Low	1,337	4.9	1,137	4.6	107	6.7	93	6.8
Moderate	5,598	20.3	4,854	19.8	399	24.8	345	25.1
Middle	9,148	33.2	8,205	33.4	526	32.7	417	30.3
Upper	10,589	38.4	9,680	39.4	480	29.8	429	31.2
NA	890	3.2	700	2.8	97	6.0	93	6.8
Total	27,562	100.0	24,576	100.0	1,609	100.0	1,377	100.0
Percentage of Total Businesses:				89.2		5.8		5.0

*NA-Tracts without household or family income as applicable

The local economy is diversified, with the major employers in the area consisting of South Carolina state government, the Palmetto Health hospital system, Blue Cross/Blue Shield of SC, Palmetto GBA, and the University of South Carolina. The unemployment rates for the three prior years are presented in the following chart:

	June 2008	June 2009	June 2010
Columbia, SC MSA	5.9%	10%	9.3%
South Carolina	6.5%	11.9%	11.1%

One community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact noted that while local financial institutions are generally supportive of the local community, recently it seems that credit is more difficult to obtain for both businesses and consumers. The contact acknowledged the impact of economic conditions has had on the capacity of both borrowers and lenders.

Performance context information indicates that local opportunities are reasonably available for community development loans and investments within the market area. Many of the bank's competitors in this market have a larger market presence; nonetheless, RBC faces few constraints in pursuing community development endeavors relative to its market presence.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (.9%) and dollar volume (.9%) is consistent with the percentage of branch offices (.2%) and deposits (.4%) in the assessment area and is considered good. During the review period, no small farm loans were originated.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Columbia, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(60) Home Purchase				(11,435)			
Low	0	0.0	0	0.0	43	0.4	3,528	0.2
Moderate	12	20.0	1,721	18.2	1,380	12.1	160,263	9.1
	(80) Refinance				(19,466)			
Low	0	0.0	0	0.0	62	0.3	7,930	0.2
Moderate	11	13.8	1,730	11.6	1,592	8.2	188,804	5.5
	(0) Home Improvement				(459)			
Low	0	0.0	0	0.0	3	0.7	111	0.2
Moderate	0	0.0	0	0.0	65	14.2	5,909	12.6
	(0) Multi-Family				(32)			
Low	0	0.0	0	0.0	5	15.6	7,337	9.8
Moderate	0	0.0	0	0.0	5	15.6	30,760	41.0
	HMDA Totals							
Low	0	0.0	0	0.0	113	0.4	18,906	0.4
Moderate	23	16.4	3,451	14.2	3,042	9.7	385,736	7.2
Middle	45	32.1	6,877	28.2	10,001	31.9	1,441,432	27.0
Upper	72	51.4	14,042	57.6	18,233	58.1	3,487,559	65.4
NA*	0	0.0	0	0.0	3	0.0	557	0.0
Total	140	100.0	24,370	100.0	31,392	100.0	5,334,190	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

Refinance and home purchase lending account for the largest number and dollar volume of HMDA loans in this market in the case of both the bank and the aggregate. RBC did not extend any loans within low-income census tracts, although aggregate lending suggests limited demand in such tracts. The bank's lending in the moderate-income census tracts is somewhat less than the proportion of owner-occupied housing units located in such areas (20.9%), but for both loan categories is substantially greater than the aggregate reporter proportion of loans within such tracts. During 2009, the bank's level of lending is considered excellent.

The bank's performance was lower during 2008. According to RBC's 2008 data, no loans were extended in low-income census tracts while 10.8% of loans were extended in moderate-income census tracts, which is generally consistent with aggregate performance for that year. The bank's performance during 2008 is considered adequate.

Despite the lower level of performance during 2008, the combined performance during 2008 and 2009 is considered excellent based on the strong performance in 2009 as well as greater weight attributed to this market based on dollar lending volume that nearly doubled year over year.

Distribution of Small Business Loans by Income Level of Census Tract

Columbia, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	1	20.0	174	64.9	488	4.0	31,173	5.5
Moderate	0	0.0	0	0.0	2,087	17.2	108,683	19.1
Middle	0	0.0	0	0.0	3,906	32.1	163,781	28.8
Upper	4	80.0	94	35.1	5,240	43.1	230,060	40.5
NA*	0	0.0	0	0.0	435	3.6	34,749	6.1
Total	5	100.0	268	100.0	12,156	100.0	568,446	100.0

*NA-Tracts without household or family income as applicable

D&B data from 2009 indicates that 4.9% and 20.3% of all area businesses are located in low- and moderate-income census tracts, respectively. As shown in the preceding table, only five loans were originated in this assessment area and one of the loans was in a low-income census tract. Aggregate lenders originated 4% and 17.2% of small business loans in low- and moderate-income census tracts respectively. Considering the limited volume, the bank's performance in 2009 is considered good. In 2008, RBC made 5.9% of small business loans in low-income census tracts in this market and no loans in moderate-income census tracts. The 2008 performance is considered poor. Overall, the bank's lending is considered poor given the much greater dollar volume of lending in 2008 (\$2.4 million) receiving greater weight than the 2009 volume (\$268,000).

In light of the significantly higher dollar volume of HMDA lending, the overall geographic loan distribution within this assessment area is considered good. This conclusion considers the institution's size, branch locations, effective demand for credit, and lending performance for the bank's HMDA and small business loan products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Columbia, SC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(60) Home Purchase				(10,030)			
Low	16	26.7	1,745	18.4	1,436	14.3	135,865	8.7
Moderate	18	30.0	2,166	22.9	2,892	28.8	351,188	22.4
	(79) Refinance				(15,176)			
Low	4	5.1	426	2.9	990	6.5	98,689	3.6
Moderate	14	17.7	1,848	12.7	2,591	17.1	305,978	11.2
	(0) Home Improvement				(434)			
Low	0	0.0	0	0.0	43	9.9	1,772	4.0
Moderate	0	0.0	0	0.0	76	17.5	5,147	11.7
	(0) Multi-Family				(0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	20	14.4	2,171	9.0	2,469	9.6	236,326	5.4
Moderate	32	23.0	4,014	16.7	5,559	21.7	662,313	15.2
Middle	31	22.3	4,819	20.0	6,376	24.9	944,936	21.8
Upper	56	40.3	13,046	54.2	11,236	43.8	2,500,398	57.6
Total	139	100.0	24,050	100.0	25,640	100.0	4,343,973	100.0
Unknown	1		320		5,752		990,217	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

The bank's lending is consistent with or exceeds aggregate lending for both refinance and home purchase loans. Within the assessment area, demographic data from the 2000 census indicates that 19.3% and 17.1% of families are low- and moderate-income, respectively; however, the aggregate is generally considered a better gauge of effective demand. The bank's level of lending is considered to be good, bordering on excellent. RBC's 2008 performance is considered excellent with 11% and 29.3% of loans originated to low- and moderate-income borrowers, respectively, which compares very favorably to the aggregate for that year. Overall, RBC's HMDA lending to borrowers of different income levels is considered excellent.

Distribution of Lending by Loan Amount and Size of Business

Columbia, SC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	2	40.0	257	95.9	3,255	26.5	267,004	46.8
Over \$1 Million	3	60.0	11	4.1	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$100,000 or less	4	80.0	94	35.1	11,076	90.0	145,318	25.5
\$100,001-\$250,000	1	20.0	174	64.9	602	4.9	104,804	18.4
\$250,001-\$1 Million	0	0.0	0	0.0	624	5.1	320,106	56.1
Total	5	100.0	268	100.0	12,302	100.0	570,228	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

In 2009, 26.5% of aggregate reported small business loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 89.2% of all local businesses have revenues that do not exceed \$1 million per year. Excluding credit card lenders, in 2009, 59% of reported small business loans were to businesses having revenues of \$1 million or less. The bank's level of lending in 2009 represents an adequate performance level in this context. In 2008, the bank's level of lending at 64.7% represents a good level of lending in the context of traditional lenders (excluding credit card lenders) extending 58.6% of loans to businesses with revenues of \$1 million or less. Overall, compared to the proxies for demand, considering performance context, and placing greater weight on 2009 performance, the bank's level of lending is good.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered excellent using aggregate data and area demographics as proxies for demand.

Community Development Lending:

During the evaluation period, the bank originated one community development loan totaling \$50,000 in conjunction with CICCAR. This project was for affordable housing. This is considered a high level of community development lending.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments, which support community development initiatives that benefit multistate, statewide, and regional areas including this MSA. During the review period, the bank also donated \$1,500 in qualified donations in this market. Given the dispersed benefits associated with investment benefiting large geographic areas, performance in this assessment area is considered adequate.

SERVICE TEST

Within this assessment area, RBC's performance under the service test is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates one branch office within this assessment area. The branch is located in a moderate-income census tract. The branch location and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is good when considering that, according to 2000 census data, 2.8% and 23% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank is an active participant in a relatively high level of community development projects that benefit the local community. Bank employees have participated in a number of seminars for first time homebuyers through local organizations.

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF SOUTH CAROLINA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	Investment Test	Service Test
Florence MSA	Consistent	Consistent	Consistent
Greenville MSA	Exceeds	Consistent	Consistent

NONMETROPOLITAN STATEWIDE AREA

(If none of the assessment areas within the non-metropolitan statewide area were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN AREAS OF SOUTH CAROLINA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas' loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	Investment Test	Service Test
Beaufort	Consistent	Consistent	Consistent
Georgetown	Consistent	Consistent	Consistent

STATE

CRA RATING FOR VIRGINIA: SATISFACTORY

The lending test is rated: High Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

Major factors supporting the rating include:

- Lending activity is consistent with the bank's capacity and helps meet identified community credit needs within a highly competitive market.
- While varying by product, the borrower distribution is considered excellent overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- While varying by product, the geographic distribution is considered good overall. Based on the dollar volume of loan categories considered, the performance of HMDA lending received the most weight in determining overall lending performance.
- No community development loans were extended in the Commonwealth during the evaluation period.
- The bank maintains an adequate level of qualified investments that benefit statewide and regional areas.
- Delivery systems and branch locations are accessible to all segments of the assessment area.
- A high level of participation in qualified community development services that generally benefit affordable housing and micro-enterprise development was noted.

SCOPE OF EXAMINATION

Analyses were conducted of HMDA and small business lending activity. The lending data was reviewed to determine the geographic distribution of the bank's lending, as well as the volume of loans provided to borrowers of different revenue size and incomes. Institutional efforts to serve its markets through qualified community development investments and services were also considered. There are two assessment areas within the Commonwealth of Virginia. The composition of each of these assessment areas is defined in **APPENDIX E** of this evaluation.

On a combined basis, the two statewide assessment areas account for 3.5%, 3%, and 2.2% of the institution's overall lending volume (in dollars), branches, and deposits, respectively. Performance in the Commonwealth of Virginia was evaluated by reviewing the Virginia Beach-Norfolk-Newport News MSA assessment areas using full scope interagency examination procedures. For the assessment area subject to the limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

The institution has 13 branch offices located throughout the Commonwealth of Virginia and ranks 11th in deposit market share having 1.3% of the state's available FDIC insured deposits in the combined markets where the bank has branches (credit union deposits are not included). One (7.7%) office is located in a low-income area and two (15.4%) are located in moderate-income areas. The bank holds approximately \$404.2 million in deposits within the statewide area.

Based on 2000 census data, the Virginia assessment areas have a total population of approximately 1.8 million, including 451,037 families. A majority of the families are middle- and upper-income (60.6%), while low- and moderate-income families comprise 20.8% and 18.6% of the total, respectively. Within these assessment areas, the owner-occupancy rate equals 56.6%, and 9.2% of families live below the poverty level. The 2008, 2009, and 2010 median family incomes for MSAs are provided in their respective market as necessary.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

Overall, the statewide lending test is rated high satisfactory. One market was reviewed with full scope procedures. Lending activity is considered good. The geographic and borrower lending distributions and provision of community development loans are also considered good overall.

Lending Activity:

Overall, lending activity is considered good and consistent with the bank's capacity. According to 2009 market share data, the bank ranks 20th and 50th in small business/farm and HMDA lending market share, respectively. However, in the majority of the bank's markets within the state, specialized lenders reported a large volume of small business loan transactions typically in the form of business credit cards. This was considered as a performance context factor when evaluating the bank's small business lending.

Geographic and Borrower Distribution:

RBC's distribution of lending is considered good. Lending performance varies by both product and market. When reaching overall conclusions, HMDA lending performance primarily received the most weight as the category typically accounted for significantly more volume of new loan dollars than small business and small farm lending.

Community Development Loans:

The bank did not provide any community development loans within the state of Virginia.

INVESTMENT TEST

The institution's level of qualified investments benefiting Virginia is considered low satisfactory. The institution holds an investment of \$1.1 million that benefits the statewide area of Virginia. The bank also has a \$56,000 investment in affordable mortgage backed securities that benefit the statewide area. Additionally, the institution actively supports various organizations that provide for community development.

SERVICE TEST

The statewide rating for the institution under the service test is high satisfactory. Delivery systems are accessible to all portions of the bank's market areas and people of varying income levels. Products and services offered within the Virginia markets are representative of those offered by the institution overall. The bank's community development services are discussed in the market area that follows this section.

METROPOLITAN AREAS

(For metropolitan areas with some or all assessment areas reviewed using full-scope review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA BEACH-NORFOLK-NEWPORT NEWS, VIRGINIA-NORTH CAROLINA MSA

This assessment area includes the entire Virginia Beach-Norfolk-Newport News, VA-NC MSA and has a population of nearly 1.6 million. The bank operates 12 branches within this market area. As of June 2009, RBC ranked 10th in deposit market share having 2% of the assessment area's available FDIC insured deposits (credit unions are not included). The market has several competing financial institutions, with Wachovia Bank, NA., SunTrust, and Towne Bank accounting for a deposit market share of 47.7%. According to 2009 aggregate loan data, RBC ranked 43rd in reported residential mortgage loans and 20th in reported small business loans. The aggregate data include 501 residential mortgage loan and 77 small business loan reporters. Both market share rankings consider originated and purchased loans.

The median housing value as of 2000 was \$107,147 and the MSA's owner-occupancy rate of 58.7% lags the Commonwealth's rate (63.3%) and the North Carolina statewide rate (61.6%). The MSA's family poverty rate of 8.4% falls in between the Commonwealth's rate (7%) and the North Carolina statewide rate (9%). The 2008, 2009, and 2010 estimated median family income for the MSA was \$65,100, \$67,900, and \$68,200, respectively.

The following table includes additional pertinent demographic data for the market area.

Assessment Area Demographics

Virginia Beach-Norfolk-Newport News, VA-NC MSA								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	25	6.9	15,991	3.9	6,686	41.8	77,956	19.2
Moderate	101	27.7	86,196	21.2	13,214	15.3	75,489	18.6
Middle	137	37.6	176,288	43.3	11,060	6.3	94,506	23.2
Upper	99	27.2	128,337	31.5	3,113	2.4	158,861	39.1
NA	2	0.5	0	0.0	0	0.0		
Total	364	100.0	406,812	100.0	34,073	8.4	406,812	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	6,552	1.8	24,988	4.3	10,290	41.2	122,491	21.2
Moderate	56,232	15.5	135,324	23.4	22,649	16.7	101,342	17.5
Middle	165,411	45.5	247,231	42.8	19,668	8.0	120,520	20.9
Upper	135,608	37.3	170,251	29.5	7,278	4.3	233,441	40.4
NA	0	0.0	0	0.0	0	0.0		
Total	363,803	100.0	577,794	100.0	59,885	10.4	577,794	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	1,882	2.8	1,632	2.7	156	4.1	94	3.0
Moderate	13,733	20.2	11,956	19.6	1,036	26.9	741	23.3
Middle	28,552	42.0	25,658	42.1	1,569	40.8	1,325	41.7
Upper	23,632	34.8	21,594	35.4	1,045	27.2	993	31.3
NA	158	0.2	95	0.2	42	1.1	21	0.7
Total	67,957	100.0	60,935	100.0	3,848	100.0	3,174	100.0
Percentage of Total Businesses:				89.7		5.7		4.7

*NA-Tracts without household or family income as applicable

The local economy is diversified, and primary employment opportunities are found in the federal and municipal governments, light and heavy manufacturing, shipbuilding, tourism, and agriculture. Major area employers include the Federal Government, public school systems, Norfolk Naval Shipyard, Dominion Enterprises, Bon Secours Hampton Roads Health Systems, and Wal-Mart. Joblessness has increased considerably over the past few years. The unemployment rates for the three prior years are presented in the following table:

	June 2008	June 2009	June 2010
Virginia Beach-Norfolk-Newport News, VA-NC MSA	4.1%	7.2%	7.6%
Virginia	4%	7.2%	7%

Recently, a community contact was made within the MSA to discuss local economic conditions and community credit needs. The contact indicated that the area needs more affordable housing options for residents, as economic conditions have increased the demand for rental housing. Overall, the contact indicated that local financial institutions are supportive of the local community.

Performance context information indicates that local opportunities are reasonably available for community development loans and investments within the market area. Given the bank's strategy and capacity, RBC faces no constraints in pursuing community development endeavors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of geographic and borrower distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate small business and HMDA loan data.

Lending Activity:

Bank lending activity within this assessment area, as measured by both number (3.2%) and dollar volume (3.5%), is consistent with the percentage of branch offices (2.8%) and deposits (2.2%) in the assessment area and is considered good. During the review period, two small farm loans totaling \$25,000 were originated within this assessment area. These loans are not included in the following analysis because of the limited volume.

The following tables present data about the bank's 2009 lending distribution by geography and by borrower income or revenue. Discussion of the performance follows each table, including evaluative statements regarding 2008 performance.

Geographic Distribution:

Distribution of HMDA Loans by Income Level of Census Tract

Virginia Beach-Norfolk-Newport News, VA-NC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
	(99)				(30,723)			
	Home Purchase							
Low	1	1.0	100	0.4	528	1.7	95,797	1.4
Moderate	18	18.2	3,671	15.2	5,104	16.6	848,226	12.4
	(197)				(71,000)			
	Refinance							
Low	2	1.0	532	1.1	827	1.2	139,905	0.9
Moderate	13	6.6	2,252	4.7	8,484	11.9	1,362,098	8.9
	(1)				(3,526)			
	Home Improvement							
Low	0	0.0	0	0.0	48	1.4	3,948	1.1
Moderate	0	0.0	0	0.0	436	12.4	27,662	7.6
	(0)				(66)			
	Multi-Family							
Low	0	0.0	0	0.0	1	1.5	4,000	2.2
Moderate	0	0.0	0	0.0	31	47.0	102,757	57.6
	HMDA Totals							
Low	3	1.0	632	0.9	1,404	1.3	243,650	1.1
Moderate	31	10.4	5,923	8.3	14,055	13.3	2,340,743	10.3
Middle	95	32.0	20,943	29.2	46,531	44.2	9,230,153	40.6
Upper	168	56.6	44,270	61.7	43,314	41.1	10,894,070	48.0
NA*	0	0.0	0	0.0	11	0.0	1,578	0.0
Total	297	100.0	71,768	100.0	105,315	100.0	22,710,194	100.0

*NA-Tracts without household or family income as applicable

() represents the total number of bank loans for the specific Loan Purpose

Loans where the geographic location is unknown are excluded from this table.

The bank's level of home purchase lending in low- and moderate-income census tracts is generally comparable to the proportion of owner-occupied housing units located in such areas (1.8% and 15.5%, respectively), as well as the percentage of aggregate lending within such tracts. On the other hand, the bank's refinance lending in moderate-income tracts is well below both the demographic and aggregate proxies for demand.

During 2008, the bank's level of lending in low- and moderate-income tracts is considered excellent, with 6.5% and 26.9% of HMDA loans extended in low- and moderate-income tracts, respectively. As noted in the previous table, RBC's overall lending performance declined compared to the prior year when its 2009 lending is considered adequate. Weighting the two years based upon relative dollar volume of lending, the bank's performance is considered good.

Distribution of Small Business Loans by Income Level of Census Tract

Virginia Beach-Norfolk-Newport News, VA-NC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	%\$	#	%	\$(000s)	%\$
Low	8	6.8	394	5.3	621	2.4	31,990	3.2
Moderate	28	23.9	2,868	38.8	4,648	17.8	243,157	24.4
Middle	39	33.3	1,337	18.1	10,918	41.8	385,110	38.6
Upper	40	34.2	2,719	36.8	9,862	37.7	323,891	32.5
NA*	2	1.7	71	1.0	76	0.3	13,325	1.3
Total	117	100.0	7,389	100.0	26,125	100.0	997,473	100.0

*NA-Tracts without household or family income as applicable

RBC’s level of small business lending performance in low-income areas is greater than both the percentage of businesses located in low-income areas (2.8%) and the aggregate reporter level. The bank’s small business lending in moderate-income census tracts also exceeds both the percentage of businesses located in such areas (20.2%) and the aggregate reporter level. The bank’s performance during 2009 is considered excellent and reflects the strength of lending in both low- and moderate-income census tracts. The bank’s good performance during 2008 borders on excellent performance with 3.8% of the bank’s loans originated in low-income census tracts and 18.1% of loans originated in moderate-income census tracts. Overall, RBC’s level of small business lending in low-and moderate-income census tracts is considered excellent.

The overall geographic loan distribution within this assessment area is considered good given the institution’s size, branch locations, effective demand for credit, and the lending performance level for the bank’s HMDA and small business products.

Distribution by Borrower Income and Revenue Size of the Business:

Distribution of HMDA Loans by Income Level of Borrower

Virginia Beach-Norfolk-Newport News, VA-NC MSA (2009)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(98)				Home Purchase (26,921)			
Low	3	3.1	321	1.4	1,435	5.3	168,314	2.8
Moderate	34	34.7	6,289	26.6	8,354	31.0	1,418,352	23.3
	(195)				Refinance (50,035)			
Low	11	5.6	1,409	3.0	3,332	6.7	410,395	3.9
Moderate	44	22.6	6,931	14.7	10,429	20.8	1,601,494	15.2
	(1)				Home Improvement (3,417)			
Low	0	0.0	0	0.0	241	7.1	14,369	4.1
Moderate	0	0.0	0	0.0	792	23.2	60,866	17.6
	(0)				Multi-Family (0)			
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	HMDA Totals							
Low	14	4.8	1,730	2.4	5,008	6.2	593,078	3.5
Moderate	78	26.5	13,220	18.7	19,575	24.4	3,080,712	18.2
Middle	61	20.7	12,628	17.8	22,938	28.5	4,512,242	26.6
Upper	141	48.0	43,215	61.0	32,852	40.9	8,782,045	51.8
Total	294	100.0	70,793	100.0	80,373	100.0	16,968,077	100.0
<i>Unknown</i>	3		975		24,942		5,742,117	

() represents the total number of bank loans for the specific Loan Purpose where income is known

Percentage's (%) are calculated on all loans where incomes are known

For 2009, refinance and home purchase loans represent the largest proportion of both bank and aggregate lending. The bank's home purchase and home refinance lending is generally consistent with the aggregate data with the exception of home purchase lending to low-income borrowers.

When considering the bank's performance of all loan types on a combined basis, lending to low-income borrowers lags the percentage of low-income families residing within the assessment area (19.2%) but only slightly lags the aggregate reporter level and is considered adequate. Bank lending to moderate-income borrowers exceeds the percentage of moderate-income area families (18.6%) as well as the aggregate reporter level and is considered good. The bank's 2009 HMDA borrower distribution performance is considered good and its performance during 2008 is considered excellent with 9.5% of loans originated to low-income and 32% of loans originated to moderate-income borrowers, both well above aggregate comparisons. RBC's overall HMDA borrower lending performance is considered excellent.

Distribution of Lending by Loan Amount and Size of Business

Virginia Beach-Norfolk-Newport News, VA-NC MSA (2009)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	63	53.8	1,991	26.9	4,950	18.6	335,579	33.4
Over \$1 Million	54	46.2	5,398	73.1	NA	NA	NA	NA
Unknown	0	0.0	0	0.0	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	101	86.3	2,021	27.4	24,684	92.9	273,023	27.2
\$100,001-\$250,000	10	8.5	1,826	24.7	850	3.2	152,586	15.2
\$250,001-\$1 Million	6	5.1	3,542	47.9	1,032	3.9	578,688	57.6
Total	117	100.0	7,389	100.0	26,566	100.0	1,004,297	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

According to 2009 aggregate small business data, 18.6% of reported loans were to businesses with annual revenues of \$1 million or less. The remaining portion of businesses either had revenues exceeding \$1 million or revenues were unknown. Additionally, D&B data indicated that 89.7% of all businesses have revenues that do not exceed \$1 million per year. Focusing on traditional lenders by excluding large credit card lenders reveals that 52.9% of the small business loans reported by these traditional lenders were to businesses having revenues of \$1 million or less. During the evaluation period, 53.8% of the bank’s small business loans were to businesses with annual revenues of \$1 million or less and this level of lending is considered good as is the bank’s 2008 performance which is substantially similar.

Overall, the distribution of loans to borrowers of different income levels and to businesses of different sizes is considered excellent using aggregate data and area demographics as proxies for demand and weighting performance based upon relative loan volume for the different products across both years during the evaluation period.

Community Development Lending:

To the extent that the bank extended loans within this assessment area that facilitate community development, such loans have already been reported as either small business or HMDA loans and cannot also be reported as community development loans. The absence of specified loans in this particular assessment area, however, does not warrant a lower overall lending performance assessment in light of the volume and distribution of other types of lending.

INVESTMENT TEST

Overall, the bank has a reasonable level of qualified investments, which support community development initiatives that benefit statewide and regional areas including this MSA. Because the benefits of such statewide investment are disbursed across a wide geographic span, performance in this assessment area is considered adequate.

SERVICE TEST

Within this assessment area, RBC’s performance under the service test is considered excellent. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low- and moderate-income areas. Also, the bank and its employees have participated in several community development projects.

Retail Services:

Delivery systems are accessible to all portions of the assessment area. Automated teller machines (ATMs) are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail and bank-by-computer services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The institution operates 12 branch offices within this assessment area. Two of the branches (16.7%) are located in moderate-income census tracts. Branch locations and business hours are considered convenient and meet the needs of the assessment area. The distribution of branches is adequate when considering that, according to 2000 census data, 3.9% and 21.2% of the assessment area's families reside in low- and moderate-income areas, respectively.

Community Development Services:

The bank participates in a relatively high level of community development projects that benefit the local community. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Virginia Beach-Norfolk-Newport News VA-NC MSA assessment area:

- Central Business District Association (small business development)
- Chamber of Commerce (small business development)
- City of Poquoson IDA (small business development)
- Hampton Roads Economic Development Authority (small business development)
- Judeo Christian Outreach Center (community service)
- Union Mission (community service)

METROPOLITAN AREAS

(For each metropolitan area where no assessment areas were reviewed using full-scope review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN METROPOLITAN AREAS OF VIRGINIA

Certain assessment areas, which are noted in the table below, were reviewed using the limited review examination procedures. Information detailing the composition of the markets, including selected demographic data, is included in **APPENDIX C** of this report. Information pertaining to the assessment areas’ loan volume, branches, and deposit volume is included in **APPENDIX D** of this report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in **APPENDIX C** of this evaluation. Conclusions regarding performance, which did not impact the institution’s overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings. In the case where the performance was considered below, the performance was at least adequate for the assessment area.

Assessment Area	Lending Test	Investment Test	Service Test
Richmond	Exceeds	Exceeds	Below

CRA APPENDIX A

SCOPE OF EXAMINATION

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
STATE	ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED⁷
Multi state	Charlotte-Gastonia-Rock Hill, NC-SC MSA	Full Scope	
North Carolina	Raleigh-Durham-Cary CSA	Full Scope	301 Fayetteville St Raleigh, NC
	Wilmington MSA	Full Scope	
	Greensboro-Winston Salem-High Point CSA	Full Scope	
	Carteret nonMSA	Full Scope	
	Asheville MSA	Limited Scope	
	Fayetteville MSA	Limited Scope	
	Goldsboro MSA	Limited Scope	
	Greenville MSA	Limited Scope	
	Hickory-Lenoir-Morganton MSA	Limited Scope	
	Jacksonville MSA	Limited Scope	
	Rocky Mount MSA	Limited Scope	131 North Church St., Rocky Mount, NC
	Avery nonMSA	Limited Scope	
	Bertie nonMSA	Limited Scope	1001 Hamilton St Roanoke Rapids, NC
	Cherokee nonMSA	Limited Scope	
	Cleveland nonMSA	Limited Scope	
	Dare nonMSA	Limited Scope	
	Granville nonMSA	Limited Scope	
	Iredell nonMSA	Limited Scope	
	Surry nonMSA	Limited Scope	
Wilson nonMSA	Limited Scope		
Alabama	Huntsville-Decatur CSA	Full Scope	4769 Whitesburg Dr Huntsville, AL
	Birmingham-Hoover MSA	Full Scope	2720 John Hawkins Parkway Hoover, AL
	Auburn-Opelika MSA	Limited Scope	
	Mobile MSA	Limited Scope	
	Montgomery MSA	Limited Scope	
	Tuscaloosa MSA	Limited Scope	
	Baldwin nonMSA	Limited Scope	
	Clay nonMSA	Limited Scope	
	Dallas nonMSA	Limited Scope	

⁷There is a statutory requirement that the written evaluation of a multistate institution's performance must list the individual branches examined in each state.

Georgia	Atlanta-Sandy Springs-Marietta MSA	Full Scope	293 Pharr Rd Atlanta, GA 4500 S. Cobb Dr. Smyrna, GA
	Columbus MSA	Limited Scope	
	Macon MSA	Limited Scope	
	Dooly nonMSA	Limited Scope	
	Polk nonMSA	Limited Scope	
	Troup nonMSA	Limited Scope	
Florida	Orlando-Deltona-Daytona Beach CSA	Full Scope	1090 Dunlawton Ave Port Orange, FL
	Miami-Fort Lauderdale-Pompano Beach MSA	Full Scope	14495 Miramar Parkway Miramar, FL
	Palm Bay-Melbourne-Titusville MSA	Full Scope	5240 Babcock St, NE Palm Bay, FL
	Cape Coral-Fort Myers MSA	Limited Scope	
	Gainesville MSA	Limited Scope	
	Naples-marco Island MSA	Limited Scope	
	Ocala MSA	Limited Scope	
	Panama City-Lynn Haven MSA	Limited Scope	
	Pensacola-Ferry Bass-Brent MSA	Limited Scope	
	Port St. Lucie-Debastian-Vero Beach CSA	Limited Scope	
	Sarasota-Bradenton-Punta Gorda CSA	Limited Scope	
	Tampa-St. Petersburg-Clearwater MSA	Limited Scope	
South Carolina	Charleston-North Charleston MSA	Full Scope	
	Myrtle Beach-Conway-North Myrtle Beach MSA	Full Scope	
	Columbia MSA	Full Scope	
	Florence MSA	Limited Scope	
	Greenville-Mauldin-Easley MSA	Limited Scope	
	Beaufort nonMSA	Limited Scope	
	Georgetown nonMSA	Limited Scope	
Virginia	Virginia Beach-Norfolk-Newport News MSA	Full Scope	
	Richmond MSA	Limited Scope	

CRA APPENDIX B

Summary of State and Multistate MSA Ratings

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Charlotte-Gastonia-Rock Hill NC-SC MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
North Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Alabama	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Georgia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Florida	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
South Carolina	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Virginia	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

CRA APPENDIX C

LIMITED REVIEW TABLES

The limited review tables presented within this appendix provide lending information for the bank during 2009. The tables contain the number of bank loans and corresponding percentages of lending within low- and moderate-income census tracts as well as lending to low- and moderate-income borrowers and businesses of different revenues. Additionally, the tables also provide the corresponding 2009 aggregate lending levels within those tracts and to borrowers for HMDA and small business loans.

The tables also detail the demographic demand proxies for HMDA, and small business loans. For HMDA lending, the demographic proxy for lending in low- and moderate-income census tracts is the percentage of owner-occupied housing within those tracts, while the proxy for lending to low- and moderate-income borrowers is the percentage of area families that are low- and moderate-income. For small business lending, the proxies for lending in low- and moderate-income census tracts are the percentages of businesses located within these tracts. Additionally, the percentages of total businesses and farms with revenues less than \$1 million are used as proxies for the distributions of lending by size of business.

For each assessment area, community development lending and information considered when evaluating performance under the investment and service tests is additionally provided. The number of branches in low- and moderate-income tracts is specified; otherwise, there are no such branch locations.

North Carolina Assessment Areas

Asheville MSA

This market includes Buncombe, Haywood, and Henderson Counties, North Carolina, which are a part of the Asheville MSA.

Performance Test Data for the Asheville MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Asheville, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(50)				(4)			
Low	0	0.0	0.9	0.6	0	0.0	0.5	0.6
Moderate	4	8.0	6.6	5.0	2	50.0	6.1	5.0
<i>Borrower</i>	(49)				(4)			
Low	1	2.0	5.5	17.6	2	50.0	6.9	17.6
Moderate	10	20.4	22.5	19.1	1	25.0	20.2	19.1
	Refinance				Multi-Family			
<i>Geographic</i>	(113)				(0)			
Low	0	0.0	0.7	0.6	0	0.0	14.3	0.6
Moderate	4	3.5	4.0	5.0	0	0.0	19.0	5.0
<i>Borrower</i>	(112)				(0)			
Low	3	2.7	4.8	17.6	0	0.0	0.0	17.6
Moderate	30	26.8	18.9	19.1	0	0.0	0.0	19.1
	HMDA Total				Consumer			
<i>Geographic</i>	(167)				(NA)			
Low	0	0.0	0.7	0.6	NA	NA	NA	NA
Moderate	10	6.0	4.7	5.0	NA	NA	NA	NA
<i>Borrower</i>	(165)				(NA)			
Low	6	3.6	5.0	17.6	NA	NA	NA	NA
Moderate	41	24.8	19.9	19.1	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(68)				(1)			
Low	9	13.2	2.7	2.6	0	0.0	3.3	0.0
Moderate	15	22.1	14.5	13.4	0	0.0	0.0	2.0
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	45	66.2	27.7	90.7	0	0.0	58.1	96.6

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's HMDA lending performance in 2008 is weaker than its 2009 performance, while small business lending is similar. Overall, RBC's lending performance is considered good in this assessment area.

Two community development loans were originated in conjunction with CICCAR, one loan for community service was renewed, and one other loan for affordable housing was originated within this assessment area during the evaluation period, with all the loans totaling approximately \$1.1 million.

INVESTMENT TEST

The bank's investment with CAHEC has funded four projects within the assessment area.

SERVICE TEST

The bank operates eight branches in this market area. Two of the branches are located in moderate-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank assisted a local organization in providing for a homeless shelter and provided financial education to a local school system within the Asheville, NC MSA assessment area.

Fayetteville MSA

This market includes Cumberland and Hoke Counties, North Carolina, which are a part of the Fayetteville MSA.

Performance Test Data for the Fayetteville Assessment Area

LENDING TEST

Limited Review Lending Table

Fayetteville, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(66)				(4)			
Low	0	0.0	0.5	1.1	0	0.0	2.0	1.1
Moderate	4	6.1	4.0	7.4	0	0.0	4.5	7.4
<i>Borrower</i>	(65)				(4)			
Low	3	4.6	3.2	19.3	0	0.0	6.6	19.3
Moderate	22	33.8	17.9	18.0	2	50.0	15.5	18.0
	Refinance				Multi-Family			
<i>Geographic</i>	(213)				(1)			
Low	0	0.0	0.5	1.1	0	0.0	5.6	1.1
Moderate	7	3.3	3.7	7.4	0	0.0	22.2	7.4
<i>Borrower</i>	(211)				(0)			
Low	8	3.8	3.9	19.3	0	0.0	0.0	19.3
Moderate	32	15.2	12.6	18.0	0	0.0	0.0	18.0
	HMDA Total				Consumer			
<i>Geographic</i>	(284)				(NA)			
Low	0	0.0	0.5	1.1	NA	NA	NA	NA
Moderate	11	3.9	3.9	7.4	NA	NA	NA	NA
<i>Borrower</i>	(280)				(NA)			
Low	11	3.9	3.6	19.3	NA	NA	NA	NA
Moderate	56	20.0	15.5	18.0	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(123)				(0)			
Low	18	14.6	7.8	7.3	0	0.0	0.0	0.0
Moderate	12	9.8	9.0	11.3	0	0.0	4.0	1.2
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	87	70.7	27.7	91.3	0	0.0	84.0	95.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's lending performance in 2008 is substantially similar to its 2009 performance, and is considered excellent overall.

One community development loan was originated within this assessment area during the evaluation period for \$26.5 million. This loan was for a community service to construct a public health facility.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates eight branches in this market area. One of the branches is located in a low-income census tract and another branch is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Goldsboro MSA

This market includes Wayne County, North Carolina, which is a part of the Goldsboro MSA.

Performance Test Data for the Goldsboro MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Goldsboro, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(14)				(2)			
Low	0	0.0	0.2	1.2	0	0.0	1.8	1.2
Moderate	3	21.4	11.4	18.3	0	0.0	10.6	18.3
<i>Borrower</i>	(14)				(2)			
Low	0	0.0	4.0	18.9	0	0.0	8.2	18.9
Moderate	3	21.4	20.3	19.1	1	50.0	15.5	19.1
	Refinance				Multi-Family			
<i>Geographic</i>	(79)				(0)			
Low	1	1.3	0.6	1.2	0	0.0	0.0	1.2
Moderate	7	8.9	11.1	18.3	0	0.0	14.3	18.3
<i>Borrower</i>	(78)				(0)			
Low	3	3.8	4.2	18.9	0	0.0	0.0	18.9
Moderate	10	12.8	13.2	19.1	0	0.0	0.0	19.1
	HMDA Total				Consumer			
<i>Geographic</i>	(95)				(NA)			
Low	1	1.1	0.5	1.2	NA	NA	NA	NA
Moderate	10	10.5	11.2	18.3	NA	NA	NA	NA
<i>Borrower</i>	(94)				(NA)			
Low	3	3.2	4.3	18.9	NA	NA	NA	NA
Moderate	14	14.9	16.2	19.1	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(17)				(0)			
Low	2	11.8	15.4	5.4	0	0.0	0.0	0.0
Moderate	2	11.8	17.3	21.3	0	0.0	1.5	3.6
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	13	76.5	26.4	90.0	0	0.0	90.3	95.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's lending performance in 2008 is substantially similar to its 2009 performance, except for the geographic distribution of small business loans, which is stronger in 2008. Overall lending performance is considered good in this assessment area.

Two community development loans for approximately \$3 million were originated within this assessment area during the evaluation period. These loans provided for affordable housing in the market area.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates two branches in this market area. Both branches are located in upper-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to Rebuilding Broken Places CDC within the Goldsboro, NC nonMSA assessment area.

Greenville MSA

This market includes Pitt County, North Carolina, which is a part of the Greenville MSA.

Performance Test Data for the Greenville MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Greenville, NC MA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(88)				(1)			
Low	0	0.0	0.1	1.7	0	0.0	1.0	1.7
Moderate	4	4.5	5.8	11.5	0	0.0	9.6	11.5
<i>Borrower</i>	(88)				(1)			
Low	8	9.1	5.8	22.6	0	0.0	4.9	22.6
Moderate	26	29.5	25.0	15.9	0	0.0	11.7	15.9
	Refinance				Multi-Family			
<i>Geographic</i>	(112)				(0)			
Low	0	0.0	0.2	1.7	0	0.0	0.0	1.7
Moderate	2	1.8	4.6	11.5	0	0.0	10.0	11.5
<i>Borrower</i>	(110)				(0)			
Low	5	4.5	3.6	22.6	0	0.0	0.0	22.6
Moderate	13	11.8	11.3	15.9	0	0.0	0.0	15.9
	HMDA Total				Consumer			
<i>Geographic</i>	(201)				(NA)			
Low	0	0.0	0.2	1.7	NA	NA	NA	NA
Moderate	6	3.0	5.2	11.5	NA	NA	NA	NA
<i>Borrower</i>	(199)				(NA)			
Low	13	6.5	4.5	22.6	NA	NA	NA	NA
Moderate	39	19.6	16.9	15.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(45)				(2)			
Low	0	0.0	1.0	1.9	0	0.0	0.0	0.0
Moderate	6	13.3	14.2	17.0	0	0.0	13.4	8.2
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	31	68.9	28.3	88.7	1	50.0	73.6	95.9

*Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known*

RBC's geographic distribution of HMDA loans is stronger in 2008, while the borrower distribution of HMDA loans is stronger in 2009. Small business lending is similar for both years. Overall, RBC's lending performance is considered good in this market.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank's investment in CAHEC helped to fund one affordable housing project within the market.

SERVICE TEST

The bank operates four branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Hickory-Lenoir-Morganton MSA

This market includes Caldwell and Catawba Counties, North Carolina, which are a part of the Hickory-Lenoir-Morganton MSA. There are no low-income census tracts within the assessment area.

Performance Test Data for the Hickory-Lenoir-Morganton MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Hickory-Lenoir-Morganton, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(6)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	6.2	9.2	0	0.0	9.1	9.2
<i>Borrower</i>	(6)				(2)			
Low	0	0.0	13.5	16.9	0	0.0	10.4	16.9
Moderate	0	0.0	29.3	18.5	1	50.0	25.2	18.5
	Refinance				Multi-Family			
<i>Geographic</i>	(42)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	4.4	9.2	0	0.0	36.4	9.2
<i>Borrower</i>	(40)				(0)			
Low	0	0.0	6.9	16.9	0	0.0	0.0	16.9
Moderate	7	17.5	17.0	18.5	0	0.0	0.0	18.5
	HMDA Total				Consumer			
<i>Geographic</i>	(50)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	5.1	9.2	NA	NA	NA	NA
<i>Borrower</i>	(48)				(NA)			
Low	0	0.0	8.9	16.9	NA	NA	NA	NA
Moderate	8	16.7	20.9	18.5	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(19)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	3	15.8	15.4	16.6	0	0.0	0.0	5.2
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	11	57.9	20.8	88.4	0	0.0	66.7	97.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

Though its small business lending in moderate-income areas is considered good, the bank's geographic lending distribution is considered poor overall and is driven by its HMDA lending as no loans were originated within moderate-income tracts in either 2008 or 2009, and HMDA lending represents significantly greater dollar volume (\$17.8 million versus \$2.2 million) than does small business lending. RBC's borrower income and revenue distribution of both HMDA and small business lending are stronger in 2008 than in 2009, but also considered poor overall due to the greater weight associated with its HMDA lending.

One community development loan was originated totaling \$75 thousand for affordable housing within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$500 in qualified donations during the evaluation period. In addition to investments previously discussed that benefit statewide or regional areas, the bank's investment in CAHEC has helped to fund an affordable housing project in the assessment area.

SERVICE TEST

The bank operates three branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, a representative from the bank has provided financial technical expertise to the Olive Hill CDC within the Hickory-Lenoir-Morgantown, NC nonMSA assessment area.

Jacksonville MSA

This market includes Onslow County, North Carolina, which is a part if the Jacksonville MSA.

Performance Test Data for the Jacksonville MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Jacksonville, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(170)				(4)			
Low	0	0.0	0.1	0.7	0	0.0	0.0	0.7
Moderate	8	4.7	2.3	3.3	0	0.0	2.3	3.3
<i>Borrower</i>	(169)				(4)			
Low	1	0.6	1.3	17.3	0	0.0	4.5	17.3
Moderate	41	24.3	14.7	19.6	0	0.0	10.9	19.6
	Refinance				Multi-Family			
<i>Geographic</i>	(95)				(0)			
Low	0	0.0	0.2	0.7	0	0.0	0.0	0.7
Moderate	1	1.1	1.5	3.3	0	0.0	0.0	3.3
<i>Borrower</i>	(91)				(0)			
Low	3	3.3	3.6	17.3	0	0.0	0.0	17.3
Moderate	12	13.2	9.1	19.6	0	0.0	0.0	19.6
	HMDA Total				Consumer			
<i>Geographic</i>	(269)				(NA)			
Low	0	0.0	0.2	0.7	NA	NA	NA	NA
Moderate	9	3.3	1.9	3.3	NA	NA	NA	NA
<i>Borrower</i>	(264)				(NA)			
Low	4	1.5	2.2	17.3	NA	NA	NA	NA
Moderate	53	20.1	12.5	19.6	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(42)				(2)			
Low	2	4.8	6.3	4.7	0	0.0	0.0	0.0
Moderate	1	2.4	3.3	5.0	0	0.0	0.0	0.8
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	32	76.2	25.9	92.1	1	50.0	70.0	93.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's geographic distribution of HMDA loans is weaker in 2008, while the geographic distribution of small business loans is stronger in 2008. Borrower distribution performance is substantially similar for both years. Overall, RBC's lending performance is considered excellent in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

An investment in the RBC Apollo Fund of \$3.3 million was made to assist with affordable housing within this market area.

SERVICE TEST

The bank operates two branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Rocky Mount MSA

This market includes Edgecombe and Nash Counties, North Carolina, which are a part of the Rocky Mount MSA.

Performance Test Data for Rocky Mount MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Rocky Mount, NC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(67)				(8)			
Low	0	0.0	0.0	0.1	0	0.0	0.0	0.1
Moderate	8	11.9	7.9	12.5	1	12.5	8.8	12.5
<i>Borrower</i>	(65)				(7)			
Low	3	4.6	5.0	21.9	0	0.0	9.1	21.9
Moderate	20	30.8	25.3	16.9	1	14.3	23.2	16.9
	Refinance				Multi-Family			
<i>Geographic</i>	(182)				(0)			
Low	0	0.0	0.0	0.1	0	0.0	0.0	0.1
Moderate	11	6.0	7.0	12.5	0	0.0	50.0	12.5
<i>Borrower</i>	(167)				(0)			
Low	7	4.2	5.4	21.9	0	0.0	0.0	21.9
Moderate	26	15.6	12.7	16.9	0	0.0	0.0	16.9
	HMDA Total				Consumer			
<i>Geographic</i>	(257)				(NA)			
Low	0	0.0	0.0	0.1	NA	NA	NA	NA
Moderate	20	7.8	7.4	12.5	NA	NA	NA	NA
<i>Borrower</i>	(239)				(NA)			
Low	10	4.2	5.4	21.9	NA	NA	NA	NA
Moderate	47	19.7	17.3	16.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(93)				(26)			
Low	1	1.1	0.4	1.2	0	0.0	0.0	0.0
Moderate	12	12.9	14.5	15.3	0	0.0	3.1	1.8
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	60	64.5	23.1	89.3	18	69.2	80.5	93.5

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's geographic distribution performances for both HMDA and small business lending are weaker in 2008 than in 2009. The HMDA borrower distribution performance is stronger in 2008, while the revenue distribution of small business loans is substantially similar for both years. Overall, RBC's lending performance is considered good in this assessment area.

One community development loan for \$1.9 million was originated within this assessment area during the evaluation period. This loan was revitalization of the area.

INVESTMENT TEST

The bank's \$9.2 million investment with Apollo Tax Credit Fund benefits the assessment area. Additionally, RBC's CAHEC investment has funded three projects located within this assessment area. In addition the bank made \$107,500 in qualified donations during the evaluation period.

SERVICE TEST

The bank operates 13 branches in this market area. One of the branches is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Rocky Mount, NC nonMSA assessment area:

- Cities In Schools (financial education)
- Communities in Schools (financial education)
- Habitat for Humanity (affordable housing)
- Junior Achievement (financial education for schools with a high level of low-and moderate-income enrollment)
- Junior Guild (community service)
- Local School Systems (financial education for schools with a high level of low- and moderate income enrollment)
- Tri-County Industries (community service)
- The Wright Center (community service)

Avery Counties Assessment Area

This market includes Avery, Mitchell, Watauga, and Yancey Counties, North Carolina. There are no low-income census tracts in the assessment area.

Performance Test Data for the Avery Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Avery, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(14)				(5)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	1.7	3.7	0	0.0	6.8	3.7
<i>Borrower</i>	(14)				(5)			
Low	0	0.0	3.4	19.1	1	20.0	13.6	19.1
Moderate	1	7.1	11.2	19.3	1	20.0	16.9	19.3
	Refinance				Multi-Family			
<i>Geographic</i>	(53)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	3.8	1.5	3.7	0	0.0	0.0	3.7
<i>Borrower</i>	(53)				(0)			
Low	1	1.9	2.8	19.1	0	0.0	0.0	19.1
Moderate	5	9.4	10.7	19.3	0	0.0	0.0	19.3
	HMDA Total				Consumer			
<i>Geographic</i>	(72)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	2.8	1.8	3.7	NA	NA	NA	NA
<i>Borrower</i>	(72)				(NA)			
Low	2	2.8	3.4	19.1	NA	NA	NA	NA
Moderate	7	9.7	11.0	19.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(22)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	1.4	1.6	0	0.0	1.9	4.0
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	14	63.6	34.9	90.9	0	0.0	94.3	98.7

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's HMDA lending is weaker in 2008 than in 2009. However, the bank's revenue distribution performance for small business loans is stronger in 2008. The small business geographic distribution performance was similar for both years. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$1,000 in qualified donations during the evaluation period. Investments benefiting this market area include two projects funded through the bank's investment in CAHEC.

SERVICE TEST

The bank operates four branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Avery, NC nonMSA assessment area:

- Chamber of Commerce (small business development)
- Workforce Development Board & Youth Council (community service)
- Watauga Education Foundation (community service)
- Yancey County United Fund (community service)

Bertie Counties Assessment Area

This market includes Bertie, Camden, Chowan, Gates, Halifax, Hertford, Martin, Northampton, Pasquotank, Perquimans, and Washington Counties, North Carolina. There are no upper-income census tracts in this assessment area.

Performance Test Data for the Bertie Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Bertie, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(46)				(9)			
Low	0	0.0	1.5	0.3	0	0.0	1.7	0.3
Moderate	18	39.1	16.4	26.4	6	66.7	20.0	26.4
<i>Borrower</i>	(45)				(9)			
Low	3	6.7	4.6	27.6	1	11.1	7.7	27.6
Moderate	14	31.1	17.6	18.6	3	33.3	20.5	18.6
	Refinance				Multi-Family			
<i>Geographic</i>	(175)				(0)			
Low	0	0.0	0.6	0.3	0	0.0	33.3	0.3
Moderate	36	20.6	13.4	26.4	0	0.0	0.0	26.4
<i>Borrower</i>	(171)				(0)			
Low	5	2.9	4.7	27.6	0	0.0	0.0	27.6
Moderate	27	15.8	13.2	18.6	0	0.0	0.0	18.6
	HMDA Total				Consumer			
<i>Geographic</i>	(230)				(NA)			
Low	0	0.0	0.9	0.3	NA	NA	NA	NA
Moderate	60	26.1	14.3	26.4	NA	NA	NA	NA
<i>Borrower</i>	(225)				(NA)			
Low	9	4.0	4.8	27.6	NA	NA	NA	NA
Moderate	44	19.6	14.7	18.6	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(130)				(103)			
Low	0	0.0	0.9	1.6	0	0.0	0.0	0.0
Moderate	63	48.5	30.1	27.5	28	27.2	30.6	29.7
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	95	73.1	31.7	90.2	94	91.3	89.0	96.9

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's lending performance in 2008 is substantially similar to its 2009 performance, and is considered excellent overall.

One community development loan (\$3.5 million) was originated within this assessment area during the evaluation period for affordable housing. One community development loan (\$349,000) was renewed during the evaluation to revitalize public utilities in the market.

INVESTMENT TEST

The bank made \$6,299 in qualified donations during the evaluation period. Two CAHEC projects funded within this market area.

SERVICE TEST

The bank operates 16 branches in this market area. Five of the branches are located in moderate-income census tracts. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Bertie, NC nonMSA assessment area:

- Choanoke Area Development Association (community service)
- Hertford County Economic Development Commission (small business development)
- Boy's and Girl's Club of Edenton (financial education)
- Halifax Business Horizons (small business development)
- Perquimans County Social Services (community service)
- Communities in Schools (financial education)

Cherokee Counties Assessment Area

This market includes Cherokee, Clay, Jackson, Macon, and Transylvania Counties, North Carolina. There are no low-income census tracts in this assessment area.

Performance Test Data for the Cherokee Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Cherokee, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(14)				(1)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	14.3	15.9	12.0	0	0.0	20.0	12.0
<i>Borrower</i>	(14)				(1)			
Low	1	7.1	4.1	19.4	0	0.0	9.9	19.4
Moderate	3	21.4	15.2	19.3	1	100.0	20.3	19.3
	Refinance				Multi-Family			
<i>Geographic</i>	(54)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	4	7.4	11.9	12.0	0	0.0	0.0	12.0
<i>Borrower</i>	(52)				(0)			
Low	4	7.7	4.7	19.4	0	0.0	0.0	19.4
Moderate	5	9.6	12.8	19.3	0	0.0	0.0	19.3
	HMDA Total				Consumer			
<i>Geographic</i>	(69)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	6	8.7	13.0	12.0	NA	NA	NA	NA
<i>Borrower</i>	(67)				(NA)			
Low	5	7.5	4.7	19.4	NA	NA	NA	NA
Moderate	9	13.4	13.6	19.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(32)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	8	25.0	10.2	10.1	0	0.0	11.8	19.7
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	24	75.0	30.7	92.0	0	0.0	76.5	97.5

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's small business lending performance in 2008 is substantially similar to its 2009 performance. RBC's HMDA geographic distribution is stronger in 2008, while the borrower distribution is stronger in 2009. Overall, the bank's lending performance is considered adequate in this market.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates six branches in this market area. One of the branches is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, a bank employee provided financial education outreach to a local school system.

Cleveland Counties Assessment Area

This market includes Cleveland and Rutherford Counties, North Carolina. There are no low- or upper-income census tracts in this assessment area.

Performance Test Data for the Cleveland Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Cleveland, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(27)				(4)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	7.4	6.0	5.4	0	0.0	9.5	5.4
<i>Borrower</i>	(26)				(4)			
Low	2	7.7	8.2	19.9	2	50.0	11.6	19.9
Moderate	9	34.6	23.8	18.3	0	0.0	19.6	18.3
	Refinance				Multi-Family			
<i>Geographic</i>	(81)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	5	6.2	3.9	5.4	0	0.0	20.0	5.4
<i>Borrower</i>	(80)				(0)			
Low	5	6.3	5.4	19.9	0	0.0	0.0	19.9
Moderate	15	18.8	15.7	18.3	0	0.0	0.0	18.3
	HMDA Total				Consumer			
<i>Geographic</i>	(112)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	7	6.3	4.7	5.4	NA	NA	NA	NA
<i>Borrower</i>	(110)				(NA)			
Low	9	8.2	6.3	19.9	NA	NA	NA	NA
Moderate	24	21.8	18.0	18.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(24)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	8.3	8.4	11.9	0	0.0	0.0	0.7
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	18	75.0	21.6	90.7	0	0.0	70.4	99.3

*Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known*

The bank's lending performance in 2008 is similar to its 2009 performance, and is considered excellent overall.

One community development loan was originated totaling \$10,000 for affordable housing within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$350 in qualified donations during the evaluation period. Otherwise, investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates three branches in this market area. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Cleveland, NC nonMSA assessment area:

- American Red Cross (community services)
- Communities in Schools (financial education)
- Rutherford County Housing Initiative (affordable housing)

Dare County Assessment Area

This market includes Dare County, North Carolina. There are no low- or moderate-income census tracts in this assessment area.

Performance Test Data for the Dare County Assessment Area

LENDING TEST

Limited Review Lending Table

Dare, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(23)				(1)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(23)				(1)			
Low	0	0.0	0.2	11.4	0	0.0	3.4	11.4
Moderate	2	8.7	4.5	15.9	0	0.0	8.5	15.9
	Refinance				Multi-Family			
<i>Geographic</i>	(42)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(40)				(0)			
Low	1	2.5	1.2	11.4	0	0.0	0.0	11.4
Moderate	7	17.5	6.1	15.9	0	0.0	0.0	15.9
	HMDA Total				Consumer			
<i>Geographic</i>	(66)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(64)				(NA)			
Low	1	1.6	1.0	11.4	NA	NA	NA	NA
Moderate	9	14.1	5.7	15.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(76)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	58	76.3	28.9	90.0	0	0.0	100.0	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

The bank's lending performance in 2008 is similar to its 2009 performance. However, the borrower distribution of HMDA loans is weaker in 2008 than in 2009. Overall, RBC's lending performance in this assessment area is considered good.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates six branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Granville Counties Assessment Area

This market includes Granville and Vance Counties, North Carolina. There are no low-income census tracts in this assessment area.

Performance Test Data for the Granville Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Granville, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(7)				(1)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	5.0	7.7	0	0.0	7.6	7.7
<i>Borrower</i>	(5)				(1)			
Low	0	0.0	6.0	21.9	0	0.0	9.8	21.9
Moderate	1	20.0	20.9	16.2	0	0.0	16.4	16.2
	Refinance				Multi-Family			
<i>Geographic</i>	(29)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	2.9	7.7	0	0.0	0.0	7.7
<i>Borrower</i>	(27)				(0)			
Low	2	7.4	4.3	21.9	0	0.0	0.0	21.9
Moderate	3	11.1	12.2	16.2	0	0.0	0.0	16.2
	HMDA Total				Consumer			
<i>Geographic</i>	(37)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	3.7	7.7	NA	NA	NA	NA
<i>Borrower</i>	(33)				(NA)			
Low	2	6.1	5.0	21.9	NA	NA	NA	NA
Moderate	4	12.1	15.2	16.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(34)				(6)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	14	41.2	18.0	19.8	0	0.0	0.0	5.3
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	21	61.8	32.3	90.2	6	100.0	91.2	96.2

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's HMDA lending performance in 2008 is substantially similar to its 2009 performance. On the other hand, the geographic distribution of small business loans is substantially weaker in 2008, but the revenue distribution of small business loans is stronger in 2008. Overall, RBC's lending performance is considered adequate in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$12,000 in qualified donations during the evaluation period. Investments benefiting this market area include the bank's investment in CAHEC which helped to fund one affordable housing project.

SERVICE TEST

The bank operates four branches in this market area. One of the branches is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, a representative from the bank has provided financial technical expertise to the local Chamber of Commerce within the Granville, NC nonMSA assessment area.

Iredell County Assessment Area

This market includes Iredell County, North Carolina. There are no low-income census tracts in this assessment area.

Performance Test Data for the Iredell County Assessment Area

LENDING TEST

Limited Review Lending Table

Iredell, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(18)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	11.1	2.2	5.1	0	0.0	3.3	5.1
<i>Borrower</i>	(18)				(0)			
Low	2	11.1	4.3	13.5	0	0.0	5.2	13.5
Moderate	8	44.4	17.8	14.8	0	0.0	19.0	14.8
	Refinance				Multi-Family			
<i>Geographic</i>	(53)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0.8	5.1	0	0.0	16.7	5.1
<i>Borrower</i>	(53)				(0)			
Low	1	1.9	2.4	13.5	0	0.0	0.0	13.5
Moderate	9	17.0	9.7	14.8	0	0.0	0.0	14.8
	HMDA Total				Consumer			
<i>Geographic</i>	(71)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	2.8	1.3	5.1	NA	NA	NA	NA
<i>Borrower</i>	(71)				(NA)			
Low	3	4.2	3.0	13.5	NA	NA	NA	NA
Moderate	17	23.9	12.1	14.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(16)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	6.3	6.4	5.6	0	0.0	0.0	0.5
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	10	62.5	23.3	90.5	1	50.0	50.0	97.2

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's lending performance in 2008 is substantially similar to its 2009 performance, except that the small business geographic distribution is weaker in 2008. Overall, RBC's lending performance is excellent in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates two branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Surry County Assessment Area

This market includes Surry County, North Carolina. There are no low- or upper-income census tracts in this assessment area.

Performance Test Data for the Surry County Assessment Area

LENDING TEST

Limited Review Lending Table

Surry, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(7)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	2.2	2.3	0	0.0	5.6	2.3
<i>Borrower</i>	(7)				(0)			
Low	0	0.0	10.9	19.4	0	0.0	5.9	19.4
Moderate	1	14.3	25.8	19.1	0	0.0	31.4	19.1
	Refinance				Multi-Family			
<i>Geographic</i>	(21)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	9.5	1.7	2.3	0	0.0	0.0	2.3
<i>Borrower</i>	(21)				(0)			
Low	0	0.0	6.8	19.4	0	0.0	0.0	19.4
Moderate	5	23.8	18.0	19.1	0	0.0	0.0	19.1
	HMDA Total				Consumer			
<i>Geographic</i>	(28)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	2	7.1	1.9	2.3	NA	NA	NA	NA
<i>Borrower</i>	(28)				(NA)			
Low	0	0.0	7.7	19.4	NA	NA	NA	NA
Moderate	6	21.4	20.2	19.1	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(21)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	4.8	3.2	6.6	0	0.0	0.0	0.0
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	19	90.5	20.8	90.7	0	0.0	75.8	99.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's small business lending performance in 2008 is similar to its 2009 performance. The geographic distribution of HMDA loans is substantially weaker in 2008, but the borrower distribution of HMDA loans is substantially stronger in 2008. Overall, RBC's lending performance is good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area include those previously discussed that benefit statewide or regional areas and one project funded through the bank's investment in CAHEC.

SERVICE TEST

The bank operates two branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Wilson County Assessment Area

This market includes Wilson County, North Carolina.

Performance Test Data for the Wilson County Assessment Area

LENDING TEST

Limited Review Lending Table

Wilson, NC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(10)				(2)			
Low	0	0.0	0.8	1.6	0	0.0	1.5	1.6
Moderate	2	20.0	8.0	14.4	1	50.0	15.4	14.4
<i>Borrower</i>	(10)				(2)			
Low	3	30.0	8.3	21.9	0	0.0	9.7	21.9
Moderate	3	30.0	22.1	16.1	1	50.0	12.9	16.1
	Refinance				Multi-Family			
<i>Geographic</i>	(20)				(0)			
Low	0	0.0	0.6	1.6	0	0.0	0.0	1.6
Moderate	1	5.0	6.8	14.4	0	0.0	33.3	14.4
<i>Borrower</i>	(20)				(0)			
Low	1	5.0	4.7	21.9	0	0.0	0.0	21.9
Moderate	3	15.0	12.0	16.1	0	0.0	0.0	16.1
	HMDA Total				Consumer			
<i>Geographic</i>	(32)				(NA)			
Low	0	0.0	0.7	1.6	NA	NA	NA	NA
Moderate	4	12.5	7.5	14.4	NA	NA	NA	NA
<i>Borrower</i>	(32)				(NA)			
Low	4	12.5	6.3	21.9	NA	NA	NA	NA
Moderate	7	21.9	16.0	16.1	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(23)				(1)			
Low	0	0.0	3.8	8.0	0	0.0	0.0	0.0
Moderate	0	0.0	18.2	18.3	0	0.0	2.1	3.4
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	9	39.1	30.8	88.6	1	100.0	66.7	94.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's revenue distribution of small business loans is stronger in 2008, while the geographic distribution of small business loans is substantially stronger in 2008. In contrast, the HMDA geographic distribution performance is substantially stronger in 2009. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank's investment in CAHEC helped to fund one affordable housing project within this assessment area.

SERVICE TEST

The bank operates two branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Wilson, NC nonMSA assessment area:

- American Red Cross (community service)
- Wilson Pregnancy Center (community service)

Alabama Assessment Areas

Auburn-Opelika MSA

This market includes Lee County, Alabama, which is a part of the Auburn-Opelika MSA.

Performance Test Data for the Auburn-Opelika MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Auburn-Opelika, AL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(16)				(3)			
Low	1	6.3	2.2	1.7	0	0.0	2.6	1.7
Moderate	5	31.3	14.7	15.3	0	0.0	11.9	15.3
<i>Borrower</i>	(16)				(3)			
Low	0	0.0	6.2	22.6	0	0.0	13.0	22.6
Moderate	3	18.8	26.7	16.2	2	66.7	16.1	16.2
	Refinance				Multi-Family			
<i>Geographic</i>	(38)				(0)			
Low	2	5.3	1.6	1.7	0	0.0	25.0	1.7
Moderate	5	13.2	11.2	15.3	0	0.0	12.5	15.3
<i>Borrower</i>	(37)				(0)			
Low	2	5.4	5.5	22.6	0	0.0	0.0	22.6
Moderate	5	13.5	15.0	16.2	0	0.0	0.0	16.2
	HMDA Total				Consumer			
<i>Geographic</i>	(57)				(NA)			
Low	3	5.3	1.9	1.7	NA	NA	NA	NA
Moderate	10	17.5	12.6	15.3	NA	NA	NA	NA
<i>Borrower</i>	(56)				(NA)			
Low	2	3.6	6.1	22.6	NA	NA	NA	NA
Moderate	10	17.9	19.8	16.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(31)				(0)			
Low	4	12.9	8.0	8.7	0	0.0	0.0	0.0
Moderate	5	16.1	10.6	11.8	0	0.0	6.7	17.1
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	21	67.7	24.0	90.3	0	0.0	60.0	98.7

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's HMDA lending performance in 2008 is substantially similar to its 2009 performance. The geographic distribution of small business loans is slightly weaker in 2008, but the revenue distribution of small business loans is stronger in 2008. Overall, RBC's lending performance is excellent in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates four branches in this market area. One branch (25%) is located in a low-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Auburn-Opelika, AL assessment area:

- Achievement Center (community service)
- East Alabama Child Services (community service)
- Food Bank of East Alabama (community service)
- Kiwanis Club of Auburn (community service)
- NeighborWorks (affordable housing)

Mobile MSA

This market includes Mobile County, Alabama, which is a part of the Mobile MSA.

Performance Test Data for the Mobile MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Mobile, AL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(111)				(14)			
Low	2	1.8	1.1	4.9	1	7.1	3.0	4.9
Moderate	11	9.9	5.4	11.9	4	28.6	6.9	11.9
<i>Borrower</i>	(111)				(14)			
Low	5	4.5	6.0	23.7	3	21.4	9.7	23.7
Moderate	29	26.1	25.6	15.7	4	28.6	17.2	15.7
	Refinance				Multi-Family			
<i>Geographic</i>	(214)				(0)			
Low	3	1.4	1.0	4.9	0	0.0	6.3	4.9
Moderate	10	4.7	4.7	11.9	0	0.0	6.3	11.9
<i>Borrower</i>	(213)				(0)			
Low	9	4.2	4.8	23.7	0	0.0	0.0	23.7
Moderate	23	10.8	14.4	15.7	0	0.0	0.0	15.7
	HMDA Total				Consumer			
<i>Geographic</i>	(339)				(NA)			
Low	6	1.8	1.1	4.9	NA	NA	NA	NA
Moderate	25	7.4	5.0	11.9	NA	NA	NA	NA
<i>Borrower</i>	(338)				(NA)			
Low	17	5.0	5.4	23.7	NA	NA	NA	NA
Moderate	56	16.6	18.6	15.7	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(209)				(0)			
Low	15	7.2	7.4	6.4	0	0.0	0.0	0.0
Moderate	16	7.7	9.7	10.2	0	0.0	3.7	4.4
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	112	53.6	22.2	88.7	0	0.0	55.6	91.8

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's borrower income and revenue distribution of HMDA and small business lending is stronger in 2008 than in 2009. Overall lending performance is considered excellent in this market.

Six community development loans (\$301,000) were originated within this assessment area during the evaluation period. These loans were primarily for affordable housing projects in the market. One community development loan renewal (\$200,000) funded the provision of community services.

INVESTMENT TEST

A portion of the bank's investment with RBC Apollo Fund (\$4.8 million) serves the assessment area. In addition, \$12,500 in qualified donations was made during the evaluation period.

SERVICE TEST

The bank operates 17 branches in this market area. One branch (5.9%) is located in a low-income and two branches (11.8%) are located in moderate-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Mobile, AL assessment area:

- Alabama Association of Community Development Corporation (financial education)
- Boys and Girls Club (financial education)
- Jack & Jill of America (financial education)
- Junior Achievement (financial education)
- Local School Systems (financial education for schools with a high low- and moderate-income enrollment)
- Mobile Housing Board (affordable housing)
- NeighborWorks (financial education)
- United Way (community service)
- Alabama Cooperative Extension System (financial education)

Montgomery MSA

This market includes Autauga, Elmore, and Montgomery Counties, Alabama, which are a part of the Montgomery MSA.

Performance Test Data for the Montgomery MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Montgomery, AL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(39)				(1)			
Low	1	2.6	0.3	3.6	0	0.0	1.5	3.6
Moderate	1	2.6	5.7	14.4	0	0.0	11.6	14.4
<i>Borrower</i>	(39)				(1)			
Low	7	17.9	11.8	21.1	0	0.0	18.9	21.1
Moderate	23	59.0	28.3	17.0	1	100.0	26.6	17.0
	Refinance				Multi-Family			
<i>Geographic</i>	(48)				(0)			
Low	0	0.0	0.5	3.6	0	0.0	0.0	3.6
Moderate	1	2.1	4.4	14.4	0	0.0	0.0	14.4
<i>Borrower</i>	(47)				(0)			
Low	4	8.5	6.1	21.1	0	0.0	0.0	21.1
Moderate	11	23.4	18.0	17.0	0	0.0	0.0	17.0
	HMDA Total				Consumer			
<i>Geographic</i>	(88)				(NA)			
Low	1	1.1	0.5	3.6	NA	NA	NA	NA
Moderate	2	2.3	5.1	14.4	NA	NA	NA	NA
<i>Borrower</i>	(87)				(NA)			
Low	11	12.6	8.7	21.1	NA	NA	NA	NA
Moderate	35	40.2	22.0	17.0	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(22)				(0)			
Low	4	18.2	11.4	10.3	0	0.0	1.5	0.0
Moderate	1	4.5	10.7	11.5	0	0.0	6.0	7.8
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	14	63.6	21.2	88.6	0	0.0	68.1	95.4

*Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known*

The bank’s lending performance in 2008 is substantially similar to its 2009 performance, except that the geographic distribution of HMDA loans is stronger in 2008 than in 2009. Overall lending performance is considered excellent in this market.

Two community development loans (\$89,000) were originated within this assessment area during the evaluation period. These primarily were for affordable housing projects.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates six branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Tuscaloosa Assessment Area

This market includes Tuscaloosa County, Alabama, which is part of the Tuscaloosa MSA.

Performance Test Data for the Baldwin County Assessment Area

LENDING TEST

Limited Review Lending Table

Tuscaloosa, AL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(10)				(1)			
Low	0	0.0	0.1	0.1	0	0.0	0.0	0.1
Moderate	2	20.0	11.5	19.0	0	0.0	8.7	19.0
<i>Borrower</i>	(10)				(1)			
Low	2	20.0	7.3	19.9	0	0.0	6.3	19.9
Moderate	5	50.0	26.1	16.7	1	100.0	22.2	16.7
	Refinance				Multi-Family			
<i>Geographic</i>	(29)				(0)			
Low	0	0.0	0.0	0.1	0	0.0	0.0	0.1
Moderate	7	24.1	10.2	19.0	0	0.0	40.0	19.0
<i>Borrower</i>	(28)				(0)			
Low	1	3.6	5.4	19.9	0	0.0	0.0	19.9
Moderate	7	25.0	14.9	16.7	0	0.0	0.0	16.7
	HMDA Total				Consumer			
<i>Geographic</i>	(40)				(NA)			
Low	0	0.0	0.0	0.1	NA	NA	NA	NA
Moderate	9	22.5	10.7	19.0	NA	NA	NA	NA
<i>Borrower</i>	(39)				(NA)			
Low	3	7.7	6.1	19.9	NA	NA	NA	NA
Moderate	13	33.3	19.2	16.7	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(36)				(0)			
Low	0	0.0	2.2	1.6	0	0.0	3.1	0.0
Moderate	19	52.8	31.9	29.9	0	0.0	15.6	11.6
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	24	66.7	28.9	89.6	0	0.0	70.6	94.7

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's borrower distribution performance for HMDA lending and geographic distribution performance for small business lending are slightly weaker in 2008 than in 2009. Overall, RBC's lending performance is considered excellent in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates four branches in this market area. One branch (25%) is located in a low-income and two branches (50%) are located in moderate-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Baldwin County Assessment Area

This market includes Baldwin County, Alabama, and it contains no low-income census tracts.

Performance Test Data for the Baldwin County Assessment Area

LENDING TEST

Limited Review Lending Table

Baldwin, AL NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(264)				(1)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	0.5	1.9	0	0.0	1.4	1.9
<i>Borrower</i>	(264)				(1)			
Low	8	3.0	2.3	12.5	0	0.0	9.3	12.5
Moderate	28	10.6	10.6	12.9	0	0.0	11.9	12.9
	Refinance				Multi-Family			
<i>Geographic</i>	(306)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	0.3	0.5	1.9	0	0.0	0.0	1.9
<i>Borrower</i>	(304)				(0)			
Low	3	1.0	2.3	12.5	0	0.0	0.0	12.5
Moderate	35	11.5	9.5	12.9	0	0.0	0.0	12.9
	HMDA Total				Consumer			
<i>Geographic</i>	(571)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	0.2	0.6	1.9	NA	NA	NA	NA
<i>Borrower</i>	(569)				(NA)			
Low	11	1.9	2.4	12.5	NA	NA	NA	NA
Moderate	63	11.1	9.9	12.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(74)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	4	5.4	1.1	1.0	0	0.0	0.0	2.2
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	54	73.0	24.3	90.7	2	100.0	63.9	93.3

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's revenue distribution performance is stronger in 2008 for small business lending, but the borrower income distribution is weaker in 2008 for HMDA lending. The geographic distribution performance is substantially stronger in 2008 for HMDA loans, but weaker in 2008 for small business loans. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas. In addition the bank made \$3,500 in qualified donations during the evaluation period.

SERVICE TEST

The bank operates 11 branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Clay Counties Assessment Area

This market includes Clay, Macon, Talladega, and Tallapoosa Counties, Alabama.

Performance Test Data for the Clay Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Clay, AL NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(13)				(9)			
Low	0	0.0	0.4	0.8	0	0.0	0.0	0.8
Moderate	2	15.4	2.1	8.3	1	11.1	6.6	8.3
<i>Borrower</i>	(13)				(8)			
Low	1	7.7	4.8	22.6	2	25.0	16.8	22.6
Moderate	1	7.7	19.2	16.5	4	50.0	17.2	16.5
	Refinance				Multi-Family			
<i>Geographic</i>	(37)				(0)			
Low	1	2.7	0.3	0.8	0	0.0	0.0	0.8
Moderate	3	8.1	3.4	8.3	0	0.0	0.0	8.3
<i>Borrower</i>	(36)				(0)			
Low	2	5.6	3.5	22.6	0	0.0	0.0	22.6
Moderate	7	19.4	12.7	16.5	0	0.0	0.0	16.5
	HMDA Total				Consumer			
<i>Geographic</i>	(59)				(NA)			
Low	1	1.7	0.3	0.8	NA	NA	NA	NA
Moderate	6	10.2	3.3	8.3	NA	NA	NA	NA
<i>Borrower</i>	(57)				(NA)			
Low	5	8.8	4.7	22.6	NA	NA	NA	NA
Moderate	12	21.1	14.7	16.5	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(21)				(0)			
Low	0	0.0	0.2	0.6	0	0.0	0.0	0.0
Moderate	8	38.1	8.5	7.8	0	0.0	14.3	8.7
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	17	81.0	20.3	91.1	0	0.0	71.4	96.3

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's lending performance in 2008 is substantially similar to its 2009 performance, except that the borrower distribution for HMDA lending is slightly weaker in 2008. Overall, RBC's level of lending is considered excellent in this assessment area.

One community development loan (\$250 thousand) was originated within this assessment area during the evaluation period for affordable housing.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates four branches in this market area. One branch (25%) is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Clay, AL assessment area:

- Junior Achievement (financial education)
- Macon County Economic Development Authority (small business development)
- Tusk University (financial education)

Dallas County Assessment Area

This market includes Dallas County, Alabama.

Performance Test Data for the Dallas County Assessment Area

LENDING TEST

Limited Review Lending Table

Dallas, AL NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(2)				(0)			
Low	0	0.0	2.4	9.3	0	0.0	8.3	9.3
Moderate	0	0.0	15.7	32.7	0	0.0	33.3	32.7
<i>Borrower</i>	(2)				(0)			
Low	0	0.0	5.9	34.8	0	0.0	10.9	34.8
Moderate	0	0.0	24.3	14.5	0	0.0	21.7	14.5
	Refinance				Multi-Family			
<i>Geographic</i>	(4)				(0)			
Low	0	0.0	3.3	9.3	0	0.0	0.0	9.3
Moderate	1	25.0	16.9	32.7	0	0.0	0.0	32.7
<i>Borrower</i>	(4)				(0)			
Low	0	0.0	6.3	34.8	0	0.0	0.0	34.8
Moderate	1	25.0	13.8	14.5	0	0.0	0.0	14.5
	HMDA Total				Consumer			
<i>Geographic</i>	(6)				(NA)			
Low	0	0.0	3.5	9.3	NA	NA	NA	NA
Moderate	1	16.7	17.9	32.7	NA	NA	NA	NA
<i>Borrower</i>	(6)				(NA)			
Low	0	0.0	6.6	34.8	NA	NA	NA	NA
Moderate	1	16.7	17.5	14.5	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(2)				(0)			
Low	0	0.0	15.6	18.4	0	0.0	2.9	0.0
Moderate	1	50.0	37.6	32.1	0	0.0	68.6	52.1
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	2	100.0	26.0	90.9	0	0.0	25.0	93.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's borrower distribution performance for HMDA loans and geographic distribution performance for small business loans are stronger in 2008 than in 2009. Overall, RBC's lending performance is considered good in this market.

One community development loan (\$161,000) was originated within this assessment area during the evaluation period for community service.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. The branch is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Georgia Assessment Areas

Columbus MSA

This market includes Marion County, Georgia, which is a part of the Columbus MSA. There are no low-income census tracts in this assessment area.

Performance Test Data for the Columbus MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Columbus, GA-AL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	56.3	44.4	0	0.0	69.2	44.4
<i>Borrower</i>	(0)				(0)			
Low	0	0.0	3.6	29.1	0	0.0	8.3	29.1
Moderate	0	0.0	28.6	20.6	0	0.0	25.0	20.6
	Refinance				Multi-Family			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	46.9	44.4	0	0.0	0.0	44.4
<i>Borrower</i>	(0)				(0)			
Low	0	0.0	8.0	29.1	0	0.0	0.0	29.1
Moderate	0	0.0	18.7	20.6	0	0.0	0.0	20.6
	HMDA Total				Consumer			
<i>Geographic</i>	(0)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	51.0	44.4	NA	NA	NA	NA
<i>Borrower</i>	(0)				(NA)			
Low	0	0.0	7.0	29.1	NA	NA	NA	NA
Moderate	0	0.0	21.7	20.6	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	54.5	61.7	0	0.0	0.0	32.3
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	8.7	89.3	0	0.0	100.0	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

No loans were made in this market in 2009. The bank's lending performance in 2008 is stronger than its 2009 performance; regardless, the bank has a very limited presence in this market and lending is performance is very poor.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. The branch is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Macon MSA

This market includes Bibb County, Georgia, which is a part of the Macon MSA.

Performance Test Data for the Macon MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Macon, GA MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(2)				(0)			
Low	0	0.0	3.6	10.0	0	0.0	6.6	10.0
Moderate	0	0.0	10.3	19.4	0	0.0	18.9	19.4
<i>Borrower</i>	(2)				(0)			
Low	1	50.0	12.0	25.6	0	0.0	10.8	25.6
Moderate	0	0.0	27.5	15.7	0	0.0	15.1	15.7
	Refinance				Multi-Family			
<i>Geographic</i>	(7)				(0)			
Low	0	0.0	3.9	10.0	0	0.0	13.3	10.0
Moderate	0	0.0	9.7	19.4	0	0.0	40.0	19.4
<i>Borrower</i>	(7)				(0)			
Low	0	0.0	6.9	25.6	0	0.0	0.0	25.6
Moderate	1	14.3	15.7	15.7	0	0.0	0.0	15.7
	HMDA Total				Consumer			
<i>Geographic</i>	(9)				(NA)			
Low	0	0.0	3.8	10.0	NA	NA	NA	NA
Moderate	0	0.0	10.3	19.4	NA	NA	NA	NA
<i>Borrower</i>	(9)				(NA)			
Low	1	11.1	9.1	25.6	NA	NA	NA	NA
Moderate	1	11.1	20.7	15.7	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(1)				(0)			
Low	0	0.0	20.4	22.0	0	0.0	12.5	0.0
Moderate	0	0.0	16.0	18.0	0	0.0	0.0	10.3
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	17.4	87.9	0	0.0	62.5	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's HMDA lending performance in 2008 is substantially stronger than its 2009 performance. Overall, RBC's lending performance is considered adequate in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, bank representatives provided financial education to a local school system and to the Georgia Department of Community Affairs within the Macon, GA assessment area.

Dooly Counties Assessment Area

This market includes Dooly and Macon Counties, Georgia. There are no low-income census tracts in the assessment area.

Performance Test Data for the Dooly Counties Assessment Area

LENDING TEST

Limited Review Lending Table

Dooly, GA NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(1)				(2)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	100.0	32.8	53.2	0	0.0	33.3	53.2
<i>Borrower</i>	(1)				(2)			
Low	1	100.0	11.8	27.8	0	0.0	0.0	27.8
Moderate	0	0.0	29.4	19.8	0	0.0	44.4	19.8
	Refinance				Multi-Family			
<i>Geographic</i>	(6)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	3	50.0	44.2	53.2	0	0.0	0.0	53.2
<i>Borrower</i>	(6)				(0)			
Low	0	0.0	8.5	27.8	0	0.0	0.0	27.8
Moderate	1	16.7	16.3	19.8	0	0.0	0.0	19.8
	HMDA Total				Consumer			
<i>Geographic</i>	(9)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	4	44.4	40.9	53.2	NA	NA	NA	NA
<i>Borrower</i>	(9)				(NA)			
Low	1	11.1	9.0	27.8	NA	NA	NA	NA
Moderate	1	11.1	20.9	19.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(24)				(5)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	22	91.7	72.3	53.5	2	40.0	77.5	53.0
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	18	75.0	22.8	88.8	5	100.0	86.6	94.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's HMDA lending performance in 2008 is stronger than 2009; however, the geographic distribution of small business loans is slightly weaker during 2008. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$3,250 in qualified donations during the evaluation period. Otherwise, investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates three branches in this market area. Two branches (66.7%) are located in moderate-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Polk County Assessment Area

This market includes Polk County, Georgia. There are no low- or moderate-income census tracts in the assessment area.

Performance Test Data for the Polk County Assessment Area

LENDING TEST

Limited Review Lending Table

Polk, GA NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(0)				(0)			
Low	0	0.0	6.5	18.6	0	0.0	11.1	18.6
Moderate	0	0.0	32.1	19.3	0	0.0	33.3	19.3
	Refinance				Multi-Family			
<i>Geographic</i>	(3)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(3)				(0)			
Low	0	0.0	5.9	18.6	0	0.0	0.0	18.6
Moderate	1	33.3	18.8	19.3	0	0.0	0.0	19.3
	HMDA Total				Consumer			
<i>Geographic</i>	(3)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Borrower</i>	(3)				(NA)			
Low	0	0.0	6.2	18.6	NA	NA	NA	NA
Moderate	1	33.3	22.7	19.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	NA	NA	NA	NA	NA	NA	NA	NA
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	23.2	92.1	0	0.0	100.0	100.0

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The borrower income and revenue distribution of HMDA and small business lending are stronger in 2008 than in 2009. Overall, RBC's borrower distribution performance is considered excellent.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Troup County Assessment Area

This market includes Troup County, Georgia. There are no low-income census tracts in this assessment area.

Performance Test Data for the Troup County Assessment Area

LENDING TEST

Limited Review Lending Table

Troup, GA NonMSA (2009)									
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic	
	#	%	%	%	#	%	%	%	
	Home Purchase				Home Improvement				
<i>Geographic</i>	(17)				(4)				
Low	NA	NA	NA	NA	NA	NA	NA	NA	
Moderate	1	5.9	3.8	3.9	0	0.0	3.0	3.9	
<i>Borrower</i>	(17)				(4)				
Low	3	17.6	8.2	18.9	2	50.0	12.5	18.9	
Moderate	8	47.1	23.5	14.4	1	25.0	17.2	14.4	
	Refinance				Multi-Family				
<i>Geographic</i>	(39)				(0)				
Low	NA	NA	NA	NA	NA	NA	NA	NA	
Moderate	0	0.0	3.1	3.9	0	0.0	0.0	3.9	
<i>Borrower</i>	(39)				(0)				
Low	2	5.1	4.4	18.9	0	0.0	0.0	18.9	
Moderate	3	7.7	14.3	14.4	0	0.0	0.0	14.4	
	HMDA Total				Consumer				
<i>Geographic</i>	(60)				(NA)				
Low	NA	NA	NA	NA	NA	NA	NA	NA	
Moderate	1	1.7	3.3	3.9	NA	NA	NA	NA	
<i>Borrower</i>	(60)				(NA)				
Low	7	11.7	5.9	18.9	NA	NA	NA	NA	
Moderate	12	20.0	17.3	14.4	NA	NA	NA	NA	
	Small Business				Small Farm				
<i>Geographic</i>	(11)				(0)				
Low	NA	NA	NA	NA	NA	NA	NA	NA	
Moderate	1	9.1	4.2	6.4	0	0.0	0.0	0.0	
<i>Revenue</i>									
Busn/ Farms with revenues <=\$1 M	9	81.8	35.5	88.3	0	0.0	60.0	100.0	

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's borrower income and revenue distribution of HMDA and small business lending in 2008 is similar to its 2009 performance. RBC's HMDA geographic distribution performance during 2008 is substantially stronger than in 2009; however, the bank's small business geographic distribution performance is substantially weaker in 2008. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates five branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the Chamber of Commerce within the Troup, GA assessment area.

Florida Assessment Areas

Cape Coral-Fort Myers-MSA

This market includes Lee County, Florida, which is a part of the Cape Coral-Fort Myers MSA.

Performance Test Data for the Cape Coral-Fort Myers MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Cape Coral-Fort Myers, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(27)				(0)			
Low	0	0.0	0.2	0.9	0	0.0	0.5	0.9
Moderate	2	7.4	5.4	12.4	0	0.0	6.0	12.4
<i>Borrower</i>	(27)				(0)			
Low	0	0.0	11.6	17.1	0	0.0	10.5	17.1
Moderate	2	7.4	22.2	19.9	0	0.0	17.8	19.9
	Refinance				Multi-Family			
<i>Geographic</i>	(5)				(0)			
Low	0	0.0	0.1	0.9	0	0.0	0.0	0.9
Moderate	0	0.0	4.5	12.4	0	0.0	35.7	12.4
<i>Borrower</i>	(5)				(0)			
Low	0	0.0	3.8	17.1	0	0.0	0.0	17.1
Moderate	0	0.0	12.5	19.9	0	0.0	0.0	19.9
	HMDA Total				Consumer			
<i>Geographic</i>	(32)				(NA)			
Low	0	0.0	0.1	0.9	NA	NA	NA	NA
Moderate	2	6.3	5.1	12.4	NA	NA	NA	NA
<i>Borrower</i>	(32)				(NA)			
Low	0	0.0	8.9	17.1	NA	NA	NA	NA
Moderate	2	6.3	18.8	19.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(6)				(0)			
Low	0	0.0	0.9	1.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.8	11.6	0	0.0	4.3	8.9
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	4	66.7	18.9	91.4	0	0.0	52.2	95.6

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's borrower distribution performance is substantially similar for both years. On the other hand, RBC's geographic distribution performance is notably stronger in 2008. Performance is overall considered good.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates two branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Gainesville MSA

This market includes Alachua County, Florida, which is a part of the Gainesville MSA.

Performance Test Data for the Gainesville MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Gainesville, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(9)				(0)			
Low	1	11.1	5.0	6.2	0	0.0	3.4	6.2
Moderate	1	11.1	14.7	15.6	0	0.0	11.5	15.6
<i>Borrower</i>	(8)				(0)			
Low	0	0.0	7.4	23.1	0	0.0	8.9	23.1
Moderate	2	25.0	23.0	15.8	0	0.0	21.4	15.8
	Refinance				Multi-Family			
<i>Geographic</i>	(13)				(0)			
Low	1	7.7	3.1	6.2	0	0.0	30.8	6.2
Moderate	0	0.0	9.4	15.6	0	0.0	61.5	15.6
<i>Borrower</i>	(13)				(0)			
Low	0	0.0	4.5	23.1	0	0.0	0.0	23.1
Moderate	3	23.1	14.4	15.8	0	0.0	0.0	15.8
	HMDA Total				Consumer			
<i>Geographic</i>	(22)				(NA)			
Low	2	9.1	3.9	6.2	NA	NA	NA	NA
Moderate	1	4.5	11.7	15.6	NA	NA	NA	NA
<i>Borrower</i>	(21)				(NA)			
Low	0	0.0	5.8	23.1	NA	NA	NA	NA
Moderate	5	23.8	18.1	15.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(10)				(0)			
Low	0	0.0	7.6	8.2	0	0.0	2.7	0.0
Moderate	3	30.0	25.5	24.5	0	0.0	2.7	4.8
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	7	70.0	20.0	89.6	0	0.0	76.3	95.7

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution performance is substantially similar for 2008 and 2009. RBC's HMDA borrower distribution performance is weaker in 2008 than in 2009; however, the small business revenue distribution performance is stronger in 2008 than in 2009. Overall, despite modest volume, performance is good.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas. In addition the bank made \$2,500 in qualified donations during the evaluation period.

SERVICE TEST

The bank operates four branches in this market area. One of the branches (25%) is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Gainesville, FL assessment area:

- Alachua County Affordable Housing Symposium (community service)
- Altrusa International of Gainesville (community service)
- Junior Achievement (financial education)
- Local School Systems (financial education for schools with high low- and moderate-income enrollment)

Naples-Marco Island MSA

This market includes Collier County, Florida, which is a part of the Naples-Marco Island MSA.

Performance Test Data for the Naples-Marco Island MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Naples-Marco Island, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(25)				(0)			
Low	0	0.0	0.8	2.3	0	0.0	7.6	2.3
Moderate	2	8.0	13.0	13.1	0	0.0	5.0	13.1
<i>Borrower</i>	(25)				(0)			
Low	0	0.0	10.5	18.9	0	0.0	14.3	18.9
Moderate	2	8.0	16.9	19.2	0	0.0	15.2	19.2
	Refinance				Multi-Family			
<i>Geographic</i>	(4)				(0)			
Low	0	0.0	0.4	2.3	0	0.0	28.6	2.3
Moderate	1	25.0	7.4	13.1	0	0.0	0.0	13.1
<i>Borrower</i>	(4)				(0)			
Low	0	0.0	3.9	18.9	0	0.0	0.0	18.9
Moderate	1	25.0	10.9	19.2	0	0.0	0.0	19.2
	HMDA Total				Consumer			
<i>Geographic</i>	(29)				(NA)			
Low	0	0.0	0.7	2.3	NA	NA	NA	NA
Moderate	3	10.3	10.3	13.1	NA	NA	NA	NA
<i>Borrower</i>	(29)				(NA)			
Low	0	0.0	7.5	18.9	NA	NA	NA	NA
Moderate	3	10.3	14.1	19.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(13)				(0)			
Low	0	0.0	1.1	2.0	0	0.0	9.1	0.0
Moderate	0	0.0	8.2	11.1	0	0.0	22.7	24.5
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	7	53.8	19.3	91.3	0	0.0	39.1	88.3

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's borrower distribution performance is substantially similar for 2008 and 2009. RBC's geographic distribution of HMDA loans is weaker in 2008 than in 2009; however, the geographic distribution of small business loans is stronger in 2008 than in 2009. Overall performance is adequate.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates three branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Ocala MSA

This market includes Marion County, Florida, which is a part of the Ocala MSA.

Performance Test Data for the Ocala MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Ocala, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(2)				(0)			
Low	0	0.0	0.0	0.4	0	0.0	0.5	0.4
Moderate	0	0.0	1.2	2.8	0	0.0	1.4	2.8
<i>Borrower</i>	(2)				(0)			
Low	0	0.0	6.1	17.1	0	0.0	11.5	17.1
Moderate	1	50.0	24.3	19.9	0	0.0	23.0	19.9
	Refinance				Multi-Family			
<i>Geographic</i>	(3)				(0)			
Low	0	0.0	0.1	0.4	0	0.0	0.0	0.4
Moderate	0	0.0	1.6	2.8	0	0.0	11.1	2.8
<i>Borrower</i>	(3)				(0)			
Low	0	0.0	5.6	17.1	0	0.0	0.0	17.1
Moderate	1	33.3	20.8	19.9	0	0.0	0.0	19.9
	HMDA Total				Consumer			
<i>Geographic</i>	(5)				(NA)			
Low	0	0.0	0.1	0.4	NA	NA	NA	NA
Moderate	0	0.0	1.5	2.8	NA	NA	NA	NA
<i>Borrower</i>	(5)				(NA)			
Low	0	0.0	6.0	17.1	NA	NA	NA	NA
Moderate	2	40.0	22.3	19.9	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(1)				(0)			
Low	0	0.0	0.7	0.7	0	0.0	0.0	0.0
Moderate	0	0.0	4.6	4.6	0	0.0	0.0	0.9
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	1	100.0	17.3	92.6	0	0.0	55.6	97.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's lending performance in 2008 is substantially similar to its 2009 performance. On modest volume, performance is adequate.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Ocala, FL assessment area:

- Chamber of Commerce (small business development)
- Children's Home Society (financial education)

Panama City-Lynn Haven MSA

This market includes Bay County, Florida, which is a part of the Panama City-Lynn Haven MSA.
Performance Test Data for the Panama City-Lynn Haven MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Panama City-Lynn Haven-Panama City Beach, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(13)				(0)			
Low	0	0.0	0.7	1.0	0	0.0	1.6	1.0
Moderate	1	7.7	10.0	19.7	0	0.0	12.6	19.7
<i>Borrower</i>	(13)				(0)			
Low	0	0.0	5.4	19.7	0	0.0	6.9	19.7
Moderate	1	7.7	16.7	18.2	0	0.0	16.1	18.2
	Refinance				Multi-Family			
<i>Geographic</i>	(12)				(0)			
Low	0	0.0	0.3	1.0	0	0.0	0.0	1.0
Moderate	0	0.0	9.1	19.7	0	0.0	33.3	19.7
<i>Borrower</i>	(12)				(0)			
Low	0	0.0	5.0	19.7	0	0.0	0.0	19.7
Moderate	4	33.3	13.4	18.2	0	0.0	0.0	18.2
	HMDA Total				Consumer			
<i>Geographic</i>	(25)				(NA)			
Low	0	0.0	0.5	1.0	NA	NA	NA	NA
Moderate	1	4.0	9.7	19.7	NA	NA	NA	NA
<i>Borrower</i>	(25)				(NA)			
Low	0	0.0	5.3	19.7	NA	NA	NA	NA
Moderate	5	20.0	15.1	18.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(0)				(0)			
Low	0	0.0	0.7	0.9	0	0.0	0.0	0.0
Moderate	0	0.0	25.0	25.3	0	0.0	33.3	27.9
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	17.1	90.6	0	0.0	66.7	98.4

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

RBC's small business lending performance is notably stronger in 2008, as the bank did not extend any small business loans in 2009. The bank's HMDA borrower distribution performance is weaker in 2008 than in 2009. Overall, RBC's lending performance is considered adequate in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Pensacola-Ferry Pass-Brent MSA

This market includes Escambia County, Florida, which is a part of the Pensacola-Ferry Pass-Brent MSA.

Performance Test Data for the Pensacola-Ferry Pass-Brent MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Pensacola-Ferry Pass-Brent, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(31)				(0)			
Low	0	0.0	1.2	1.9	0	0.0	0.8	1.9
Moderate	4	12.9	12.7	21.0	0	0.0	17.6	21.0
<i>Borrower</i>	(31)				(0)			
Low	2	6.5	12.1	22.0	0	0.0	14.1	22.0
Moderate	11	35.5	26.3	18.2	0	0.0	27.7	18.2
	Refinance				Multi-Family			
<i>Geographic</i>	(36)				(0)			
Low	0	0.0	0.4	1.9	0	0.0	25.0	1.9
Moderate	2	5.6	11.6	21.0	0	0.0	37.5	21.0
<i>Borrower</i>	(36)				(0)			
Low	0	0.0	7.5	22.0	0	0.0	0.0	22.0
Moderate	7	19.4	20.1	18.2	0	0.0	0.0	18.2
	HMDA Total				Consumer			
<i>Geographic</i>	(67)				(NA)			
Low	0	0.0	0.8	1.9	NA	NA	NA	NA
Moderate	6	9.0	12.3	21.0	NA	NA	NA	NA
<i>Borrower</i>	(67)				(NA)			
Low	2	3.0	10.1	22.0	NA	NA	NA	NA
Moderate	18	26.9	23.5	18.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(26)				(0)			
Low	5	19.2	5.2	4.4	0	0.0	0.0	0.0
Moderate	7	26.9	30.1	27.1	0	0.0	13.3	12.9
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	17	65.4	21.5	90.8	0	0.0	66.7	98.2

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution of small business loans is significantly weaker in 2008 than in 2009; however, the revenue distribution of small business loans is stronger in 2008 than in 2009. The geographic distribution of HMDA loans is stronger in 2008, while the borrower distribution of HMDA loans is stronger in 2009. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates four branches in this market area. One of the branches (25%) is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial education to a local organization and assisted with small business development with the Downtown Improvement Board within the Pensacola-Ferry Pass-Brent, FL assessment area.

Port St. Lucie-Sebastian-Vero Beach CSA

This market includes St. Lucie and Indian River Counties, Florida, which are a part of the Port St. Lucie-Sebastian-Vero Beach CSA.

Performance Test Data for Port St. Lucie-Sebastian-Vero Beach CSA Assessment Area

LENDING TEST

Limited Review Lending Table

Port St. Lucie-Sebastian-Vero Beach, FL CSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(41)				(4)			
Low	0	0.0	0.2	1.2	0	0.0	0.8	1.2
Moderate	2	4.9	5.4	14.2	1	25.0	8.8	14.2
<i>Borrower</i>	(41)				(4)			
Low	0	0.0	10.7	19.8	2	50.0	12.3	19.8
Moderate	4	9.8	29.1	20.7	0	0.0	19.5	20.7
	Refinance				Multi-Family			
<i>Geographic</i>	(41)				(0)			
Low	0	0.0	0.3	1.2	0	0.0	0.0	1.2
Moderate	4	9.8	6.1	14.2	0	0.0	0.0	14.2
<i>Borrower</i>	(41)				(0)			
Low	4	9.8	6.9	19.8	0	0.0	0.0	19.8
Moderate	5	12.2	17.4	20.7	0	0.0	0.0	20.7
	HMDA Total				Consumer			
<i>Geographic</i>	(86)				(NA)			
Low	0	0.0	0.3	1.2	NA	NA	NA	NA
Moderate	7	8.1	5.7	14.2	NA	NA	NA	NA
<i>Borrower</i>	(86)				(NA)			
Low	6	7.0	9.5	19.8	NA	NA	NA	NA
Moderate	9	10.5	25.0	20.7	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(40)				(0)			
Low	0	0.0	2.1	2.6	0	0.0	0.0	0.0
Moderate	3	7.5	16.8	15.7	0	0.0	21.1	21.4
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	36	90.0	17.5	92.6	0	0.0	31.6	84.3

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution of small business loans is stronger in 2008 than in 2009; however, the geographic distribution of HMDA loans is substantially weaker in 2008 than in 2009. The borrower distribution of HMDA loans is stronger in 2008 than in 2009. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank made \$26,250 in qualified donations during the evaluation period. Otherwise, investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates seven branches in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to the following entities within the Port St. Lucie-Sebastian-Vero Beach, FL assessment area:

- Cultural Council of Indian River (community service)
- Habitat for Humanity (affordable housing)
- Literacy Services of Indian River County (community service)
- Salvation Army (community service)
- United Way (community service)

Sarasota-Bradenton-Punta Gorda CSA

This market includes Manatee, Sarasota, and Charlotte Counties, Florida, which are a part of the Sarasota-Bradenton-Punta Gorda CSA.

Performance Test Data for the Sarasota-Bradenton-Punta Gorda CSA Assessment Area

LENDING TEST

Limited Review Lending Table

Sarasota-Bradenton-Punta Gorda, FL CSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(27)				(1)			
Low	0	0.0	0.2	0.2	0	0.0	0.0	0.2
Moderate	1	3.7	9.2	17.2	1	100.0	12.7	17.2
<i>Borrower</i>	(27)				(1)			
Low	1	3.7	9.0	17.2	0	0.0	10.8	17.2
Moderate	2	7.4	19.7	19.8	1	100.0	22.4	19.8
	Refinance				Multi-Family			
<i>Geographic</i>	(14)				(0)			
Low	0	0.0	0.1	0.2	0	0.0	0.0	0.2
Moderate	0	0.0	7.1	17.2	0	0.0	46.2	17.2
<i>Borrower</i>	(14)				(0)			
Low	3	21.4	5.9	17.2	0	0.0	0.0	17.2
Moderate	1	7.1	15.6	19.8	0	0.0	0.0	19.8
	HMDA Total				Consumer			
<i>Geographic</i>	(42)				(NA)			
Low	0	0.0	0.1	0.2	NA	NA	NA	NA
Moderate	2	4.8	8.2	17.2	NA	NA	NA	NA
<i>Borrower</i>	(42)				(NA)			
Low	4	9.5	7.6	17.2	NA	NA	NA	NA
Moderate	4	9.5	17.8	19.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(60)				(1)			
Low	0	0.0	0.3	0.4	0	0.0	0.0	0.0
Moderate	11	18.3	15.0	16.0	0	0.0	4.8	8.4
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	49	81.7	20.5	91.5	1	100.0	52.4	92.1

*Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known
Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known*

The bank's geographic distribution of small business loans is weaker in 2008 than in 2009; however, the geographic distribution of HMDA loans is substantially stronger in 2008 than in 2009. The borrower distribution of HMDA loans is weaker in 2008 than in 2009. Overall, RBC's lending performance is considered adequate in this assessment area.

Two community development loans (\$260,000) were originated within this assessment area during the evaluation period for an affordable housing project.

INVESTMENT TEST

The bank made \$5,000 in qualified donations during the evaluation period. Otherwise, investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates 12 branches in this market area. One of the branches (8.3%) is located in a moderate-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Tampa-St. Petersburg-Clearwater MSA

This market includes Hillsborough and Pinellas Counties, Florida, which are a part of the Tampa-St. Petersburg-Clearwater MSA.

Performance Test Data for the Tampa-St. Petersburg-Clearwater MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Tampa-St. Petersburg-Clearwater, FL MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(44)				(1)			
Low	1	2.3	0.6	1.0	0	0.0	0.6	1.0
Moderate	9	20.5	13.5	15.7	0	0.0	9.6	15.7
<i>Borrower</i>	(44)				(1)			
Low	3	6.8	6.7	18.0	0	0.0	8.0	18.0
Moderate	5	11.4	23.4	17.8	0	0.0	16.9	17.8
	Refinance				Multi-Family			
<i>Geographic</i>	(25)				(0)			
Low	2	8.0	0.5	1.0	0	0.0	1.8	1.0
Moderate	2	8.0	9.7	15.7	0	0.0	19.6	15.7
<i>Borrower</i>	(25)				(0)			
Low	1	4.0	5.6	18.0	0	0.0	0.0	18.0
Moderate	7	28.0	15.9	17.8	0	0.0	0.0	17.8
	HMDA Total				Consumer			
<i>Geographic</i>	(70)				(NA)			
Low	3	4.3	0.6	1.0	NA	NA	NA	NA
Moderate	11	15.7	11.6	15.7	NA	NA	NA	NA
<i>Borrower</i>	(70)				(NA)			
Low	4	5.7	6.3	18.0	NA	NA	NA	NA
Moderate	12	17.1	19.8	17.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(22)				(0)			
Low	0	0.0	1.7	2.2	0	0.0	0.0	0.0
Moderate	3	13.6	19.1	20.4	0	0.0	13.4	15.3
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	6	27.3	19.5	89.5	0	0.0	52.1	92.2

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution performance is substantially similar for both years. RBC's borrower distribution performance is stronger in 2008 than in 2009. Overall performance is considered good.

One community development loan (\$17,000) was originated within this assessment area during the evaluation period for an affordable housing project.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates five branches in this market area. Two of the branches (40%) are located in moderate-income census tracts. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves. During the evaluation period, representatives from the bank have provided financial technical expertise to area small businesses and to the Women of Integrity Networking organization within the Tampa-St. Petersburg-Clearwater, FL assessment area.

South Carolina Assessment Areas

Florence MSA

This market includes Florence County, South Carolina, which is a part of the Florence MSA.

Performance Test Data for the Florence MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Florence, SC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(60)				(3)			
Low	0	0.0	0.1	1.6	0	0.0	0.0	1.6
Moderate	1	1.7	6.4	15.6	0	0.0	17.7	15.6
<i>Borrower</i>	(60)				(3)			
Low	7	11.7	9.0	22.0	0	0.0	20.3	22.0
Moderate	19	31.7	24.7	15.8	1	33.3	20.3	15.8
	Refinance				Multi-Family			
<i>Geographic</i>	(28)				(0)			
Low	0	0.0	0.2	1.6	0	0.0	0.0	1.6
Moderate	1	3.6	7.5	15.6	0	0.0	0.0	15.6
<i>Borrower</i>	(27)				(0)			
Low	1	3.7	4.2	22.0	0	0.0	0.0	22.0
Moderate	2	7.4	13.5	15.8	0	0.0	0.0	15.8
	HMDA Total				Consumer			
<i>Geographic</i>	(91)				(NA)			
Low	0	0.0	0.1	1.6	NA	NA	NA	NA
Moderate	2	2.2	7.4	15.6	NA	NA	NA	NA
<i>Borrower</i>	(90)				(NA)			
Low	8	8.9	6.6	22.0	NA	NA	NA	NA
Moderate	22	24.4	17.9	15.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(5)				(0)			
Low	1	20.0	2.0	2.3	0	0.0	0.0	0.0
Moderate	1	20.0	15.6	22.7	0	0.0	13.8	10.1
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	2	40.0	26.8	89.5	0	0.0	74.2	96.8

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution of small business loans is weaker in 2008 than in 2009. The borrower distribution of HMDA loans is weaker in 2008 than in 2009, but the revenue distribution of small business loans is stronger in 2008 than in 2009. Overall, RBC's lending performance is considered adequate in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank's CAHEC investment helped to fund an affordable housing project within this market.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Greenville MSA

This market includes Greenville County, South Carolina, which is a part of the Greenville MSA.

Performance Test Data for the Greenville MSA Assessment Area

LENDING TEST

Limited Review Lending Table

Greenville-Mauldin-Easley, SC MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(9)				(0)			
Low	0	0.0	1.3	1.6	0	0.0	0.8	1.6
Moderate	0	0.0	9.7	16.2	0	0.0	8.1	16.2
<i>Borrower</i>	(9)				(0)			
Low	0	0.0	9.8	18.5	0	0.0	10.3	18.5
Moderate	2	22.2	27.4	17.3	0	0.0	15.0	17.3
	Refinance				Multi-Family			
<i>Geographic</i>	(26)				(0)			
Low	0	0.0	0.7	1.6	0	0.0	0.0	1.6
Moderate	2	7.7	5.3	16.2	0	0.0	20.0	16.2
<i>Borrower</i>	(25)				(0)			
Low	0	0.0	4.9	18.5	0	0.0	0.0	18.5
Moderate	3	12.0	15.0	17.3	0	0.0	0.0	17.3
	HMDA Total				Consumer			
<i>Geographic</i>	(35)				(NA)			
Low	0	0.0	0.9	1.6	NA	NA	NA	NA
Moderate	2	5.7	6.8	16.2	NA	NA	NA	NA
<i>Borrower</i>	(34)				(NA)			
Low	0	0.0	6.7	18.5	NA	NA	NA	NA
Moderate	5	14.7	19.4	17.3	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(8)				(0)			
Low	2	25.0	5.0	4.0	0	0.0	0.0	0.0
Moderate	1	12.5	11.8	15.7	0	0.0	0.0	2.5
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	2	25.0	25.0	88.2	0	0.0	76.9	98.7

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

Overall, the bank's 2008 performance is better than its 2009 performance, particularly with respect to its borrower income and revenue distribution of HMDA and small business lending, as well as geographic distribution of HMDA loans. Overall, RBC's lending performance is considered good in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Beaufort County Assessment Area

This market includes Beaufort County, South Carolina, and it contains no low-income census tracts.

Performance Test Data for the Beaufort County Assessment Area

LENDING TEST

Limited Review Lending Table

Beaufort, SC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(25)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	1.2	7.8	0	0.0	6.8	7.8
<i>Borrower</i>	(25)				(0)			
Low	0	0.0	0.9	12.7	0	0.0	5.0	12.7
Moderate	0	0.0	6.0	13.0	0	0.0	9.2	13.0
	Refinance				Multi-Family			
<i>Geographic</i>	(20)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	1.7	7.8	0	0.0	0.0	7.8
<i>Borrower</i>	(19)				(0)			
Low	1	5.3	1.5	12.7	0	0.0	0.0	12.7
Moderate	4	21.1	4.9	13.0	0	0.0	0.0	13.0
	HMDA Total				Consumer			
<i>Geographic</i>	(45)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	1.6	7.8	NA	NA	NA	NA
<i>Borrower</i>	(44)				(NA)			
Low	1	2.3	1.4	12.7	NA	NA	NA	NA
Moderate	4	9.1	5.3	13.0	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(2)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	2.7	3.8	0	0.0	0.0	14.5
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	2	100.0	24.0	89.8	0	0.0	71.4	89.1

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's geographic distribution of HMDA lending is stronger in 2008 than in 2009. The borrower income and revenue distributions of HMDA and small business lending are weaker in 2008 than in 2009. Overall, RBC's lending performance is considered adequate in this assessment area.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Georgetown County Assessment Area

This market includes Georgetown County, South Carolina, and it contains no low-income census tracts.

Performance Test Data for the Georgetown County Assessment Area

LENDING TEST

Limited Review Lending Table

Georgetown, SC NonMSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(1)				(1)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	10.1	22.6	0	0.0	14.9	22.6
<i>Borrower</i>	(1)				(1)			
Low	0	0.0	3.3	19.7	0	0.0	8.8	19.7
Moderate	0	0.0	11.7	16.8	0	0.0	10.3	16.8
	Refinance				Multi-Family			
<i>Geographic</i>	(3)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	33.3	6.8	22.6	0	0.0	0.0	22.6
<i>Borrower</i>	(3)				(0)			
Low	0	0.0	2.0	19.7	0	0.0	0.0	19.7
Moderate	1	33.3	8.4	16.8	0	0.0	0.0	16.8
	HMDA Total				Consumer			
<i>Geographic</i>	(5)				(NA)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	1	20.0	7.6	22.6	NA	NA	NA	NA
<i>Borrower</i>	(5)				(NA)			
Low	0	0.0	2.4	19.7	NA	NA	NA	NA
Moderate	1	20.0	9.1	16.8	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(0)				(0)			
Low	NA	NA	NA	NA	NA	NA	NA	NA
Moderate	0	0.0	11.7	20.1	0	0.0	0.0	24.2
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	36.3	90.4	0	0.0	66.7	90.9

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank's distribution of HMDA lending, with similar volume, is substantially weaker in 2008 than in 2009. RBC did not extend any small business loans in 2009 and only four in 2008. Lending performance is poor, though volume is very limited.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

Investments benefiting this market area are limited to investments previously discussed that benefit statewide or regional areas.

SERVICE TEST

The bank operates one branch in this market area. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

Virginia Assessment Area

Richmond MSA

This market includes Richmond City, Virginia, which is a part of the Richmond MSA.

Performance Test Data for Assessment Area Name

LENDING TEST

Limited Review Lending Table

Richmond, VA MSA (2009)								
Income Categories	Bank		Aggregate	Demographic	Bank		Aggregate	Demographic
	#	%	%	%	#	%	%	%
	Home Purchase				Home Improvement			
<i>Geographic</i>	(1)				(0)			
Low	0	0.0	13.5	13.8	0	0.0	13.0	13.8
Moderate	1	100.0	33.9	38.7	0	0.0	37.0	38.7
<i>Borrower</i>	(1)				(0)			
Low	0	0.0	16.5	36.4	0	0.0	17.9	36.4
Moderate	1	100.0	32.5	19.2	0	0.0	26.9	19.2
	Refinance				Multi-Family			
<i>Geographic</i>	(3)				(0)			
Low	0	0.0	8.5	13.8	0	0.0	21.4	13.8
Moderate	2	66.7	30.5	38.7	0	0.0	39.3	38.7
<i>Borrower</i>	(3)				(0)			
Low	0	0.0	11.3	36.4	0	0.0	0.0	36.4
Moderate	2	66.7	23.0	19.2	0	0.0	0.0	19.2
	HMDA Total				Consumer			
<i>Geographic</i>	(4)				(NA)			
Low	0	0.0	10.4	13.8	NA	NA	NA	NA
Moderate	3	75.0	31.9	38.7	NA	NA	NA	NA
<i>Borrower</i>	(4)				(NA)			
Low	0	0.0	13.4	36.4	NA	NA	NA	NA
Moderate	3	75.0	26.5	19.2	NA	NA	NA	NA
	Small Business				Small Farm			
<i>Geographic</i>	(0)				(0)			
Low	0	0.0	25.2	32.7	0	0.0	0.0	0.0
Moderate	0	0.0	32.1	30.5	0	0.0	100.0	11.5
<i>Revenue</i>								
Busn/ Farms with revenues <=\$1 M	0	0.0	18.8	85.6	0	0.0	0.0	92.3

Geographic () represents the total number of bank loans for the specific Loan Purpose where geography is known

Borrower () represents the total number of bank loans for the specific Loan Purpose where income is known

The bank has a very limited presence in this market, as reflected in the small volume of lending. RBC did not extend any small business loans in this assessment area. The bank's HMDA geographic distribution performance is significantly weaker in 2008 than in 2009. Nonetheless, HMDA lending is considered excellent overall.

No community development loans were originated within this assessment area during the evaluation period.

INVESTMENT TEST

The bank's investment in CAHEC has provided funding for one affordable housing project in the assessment area.

SERVICE TEST

The bank operates one branch in this market area. The branch is located in a low-income census tract. Banking services offered in this assessment area are substantially similar to the services available to other communities the bank serves.

CRA APPENDIX D

Loan, Branch, and Deposit Volume by Assessment Area*

Loan volume data reflects the HMDA, small business, and small farm loans reported by the institution from January 1, 2008, through December 31, 2009. Deposit volume data was reported to the Federal Deposit Insurance Corporation and is current through June 2009.

Assessment Area	Loan Volume				Deposit Volume		Branch Distribution	
	#	% of #	\$ (000s)	% of \$	Deposits	% of Total	# Branches	% of Total
Charlotte Multistate	1,275	4.91%	\$269,090	6.28%	\$932,809	5.04%	17	3.92%
Asheville NC	451	1.74%	\$84,207	1.97%	\$235,623	1.27%	8	1.84%
Fayetteville NC	782	3.01%	\$116,853	2.73%	\$357,830	1.93%	8	1.84%
Goldensboro NC	239	0.92%	\$29,358	0.69%	\$93,004	0.50%	2	0.46%
Greenville NC	487	1.88%	\$67,086	1.57%	\$161,310	0.87%	4	0.92%
Greensboro NC total	999	3.85%	\$143,507	3.35%	\$631,644	3.41%	17	3.92%
Hickory NC total	136	0.52%	\$20,199	0.47%	\$78,058	0.42%	3	0.69%
Jacksonville NC total	607	2.34%	\$89,683	2.09%	\$202,260	1.09%	2	0.46%
Avery NC total	171	0.66%	\$30,314	0.71%	\$142,473	0.77%	4	0.92%
Bertie NC total	982	3.78%	\$107,653	2.51%	\$641,623	3.47%	16	3.69%
Carteret NC total	1,481	5.70%	\$220,858	5.16%	\$825,561	4.46%	21	4.84%
Cherokee NC total	194	0.75%	\$35,328	0.83%	\$219,094	1.18%	6	1.38%
Cleveland NC total	271	1.04%	\$33,868	0.79%	\$96,917	0.52%	3	0.69%
Dare NC total	317	1.22%	\$51,432	1.20%	\$257,878	1.39%	6	1.38%
Granville NC total	145	0.56%	\$22,160	0.52%	\$195,706	1.06%	4	0.92%
Iredell NC total	203	0.78%	\$36,153	0.84%	\$49,932	0.27%	2	0.46%
Surry NC total	94	0.36%	\$8,401	0.20%	\$129,894	0.70%	2	0.46%
Wilson NC total	108	0.42%	\$13,220	0.31%	\$61,293	0.33%	2	0.46%
Raleigh total	3,103	11.95%	\$541,109	12.64%	\$1,948,491	10.52%	32	7.37%
Rocky Mount total	767	2.95%	\$94,432	2.21%	\$892,389	4.82%	13	3.00%
Wilmington NC total	1,027	3.96%	\$204,048	4.77%	\$411,917	2.22%	11	2.53%
NC total	12,564	48.40%	\$1,949,869	45.54%	\$7,632,897	41.23%	166	38.25%
Richmond total	6	0.02%	\$1,176	0.03%	\$532	0.00%	1	0.23%
VA Beach total	819	3.15%	\$149,285	3.49%	\$403,626	2.18%	12	2.76%
VA total	825	3.18%	\$150,461	3.51%	\$404,158	2.18%	13	3.00%
Charleston SC total	214	0.82%	\$71,238	1.66%	\$58,413	0.32%	2	0.46%
Columbia SC total	245	0.94%	\$40,175	0.94%	\$69,201	0.37%	1	0.23%
Florence SC total	144	0.55%	\$21,030	0.49%	\$30,996	0.17%	1	0.23%
Greenville SC total	91	0.35%	\$17,116	0.40%	\$45,113	0.24%	1	0.23%
Myrtle Beach SC total	242	0.93%	\$63,603	1.49%	\$215,637	1.16%	1	0.23%

* Totals may not add due to rounding.

**RBC Bank (USA)
Raleigh, North Carolina**

**CRA Public Evaluation
June 21, 2010**

Beaufort SC total	131	0.50%	\$49,760	1.16%	\$10,918	0.06%	1	0.23%
Georgetown SC total	16	0.06%	\$4,745	0.11%	\$6,989	0.04%	1	0.23%
SC total	1,083	4.17%	\$267,667	6.25%	\$437,267	2.36%	8	1.84%
Atlanta GA total	1,910	7.36%	\$259,248	6.05%	\$2,443,327	13.20%	53	12.21%
Columbus GA total	3	0.01%	\$158	0.00%	\$9,423	0.05%	1	0.23%
Macon GA total	21	0.08%	\$3,185	0.07%	\$4,497	0.02%	1	0.23%
Dooley GA total	91	0.35%	\$9,025	0.21%	\$134,751	0.73%	3	0.69%
Polk GA total	7	0.03%	\$752	0.02%	\$9,432	0.05%	1	0.23%
Troup GA total	112	0.43%	\$10,802	0.25%	\$120,713	0.65%	5	1.15%
GA total	2,144	8.26%	\$283,170	6.61%	\$2,722,143	14.70%	64	14.75%
Cape Coral FL total	57	0.22%	\$12,974	0.30%	\$56,612	0.31%	2	0.46%
Gainesville FL total	55	0.21%	\$9,957	0.23%	\$84,186	0.45%	4	0.92%
Miami FL total	375	1.44%	\$73,780	1.72%	\$630,661	3.41%	14	3.23%
Naples FL total	73	0.28%	\$20,941	0.49%	\$110,631	0.60%	3	0.69%
Ocala FL total	19	0.07%	\$2,334	0.05%	\$18,513	0.10%	1	0.23%
Orlando total	722	2.78%	\$114,446	2.67%	\$726,671	3.92%	27	6.22%
Palm Bay total	244	0.94%	\$35,806	0.84%	\$135,660	0.73%	6	1.38%
Panama City total	36	0.14%	\$7,947	0.19%	\$3,261	0.02%	1	0.23%
Pensacola total	156	0.60%	\$27,618	0.64%	\$81,984	0.44%	4	0.92%
Port St Lucie total	214	0.82%	\$30,419	0.71%	\$342,856	1.85%	7	1.61%
Sarasota total	274	1.06%	\$28,522	0.67%	\$344,844	1.86%	12	2.76%
Tampa total	190	0.73%	\$32,911	0.77%	\$134,568	0.73%	5	1.15%
FL total	2,415	9.30%	\$397,655	9.29%	\$2,670,447	14.42%	86	19.82%
Auburn AL total	139	0.54%	\$22,025	0.51%	\$266,968	1.44%	4	0.92%
Birmingham AL total	1,096	4.22%	\$231,642	5.41%	\$856,312	4.62%	17	3.92%
Huntsville AL total	1,775	6.84%	\$299,484	6.99%	\$816,538	4.41%	16	3.69%
Mobile AL total	1,072	4.13%	\$132,803	3.10%	\$751,832	4.06%	17	3.92%
Montgomery AL total	226	0.87%	\$30,378	0.71%	\$128,935	0.70%	6	1.38%
Tuscaloosa total	177	0.68%	\$23,059	0.54%	\$216,064	1.17%	4	0.92%
Baldwin AL total	1,012	3.90%	\$208,712	4.87%	\$430,991	2.33%	11	2.53%
Clay AL total	141	0.54%	\$14,601	0.34%	\$203,912	1.10%	4	0.92%
Dallas AL total	16	0.06%	\$1,487	0.03%	\$43,851	0.24%	1	0.23%
AL Total	5,654	21.78%	\$964,191	22.52%	\$3,715,403	20.07%	80	18.43%
GRAND TOTAL	25,960	100.00%	\$4,282,103	100.00%	\$18,515,124	100.00%	434	100.00%

CRA APPENDIX E

Assessment Area Composition

The following tables present the composition of the bank’s assessment areas grouped by state. Market areas are presented alphabetically within each state with metropolitan and combined statistical areas presented first. Nonmetropolitan assessment areas are presented alphabetically after the final metropolitan area within each state.

Multistate MSA

Charlotte-Gastonia-Rock Hill, NC-SC MSA		
State	MSA	County
NC	Charlotte-Gastonia-Rock Hill, NC-SC MSA	Anson
		Cabarrus
		Gaston
		Mecklenburg
		Union
SC		York

North Carolina Markets

Asheville, NC MSA		
State	MSA	County
NC	Asheville, NC MSA	Buncombe
		Haywood
		Henderson
Fayetteville, NC MSA		
State	MSA	County
NC	Fayetteville, NC MSA	Cumberland
		Hoke
Goldsboro, NC MSA		
State	MSA	County
NC	Goldsboro, NC MSA	Wayne
Greensboro-Winston Salem-High Point, NC CSA		
State	MSA	County
NC	Greensboro-High Point, NC MSA	Guilford
		Randolph
	Burlington, NC MSA	Alamance
	Winston-Salem, NC MSA	Forsyth
Greenville, NC MSA		
State	MSA	County
NC	Greenville, NC MSA	Pitt
Hickory-Lenoir-Morganton, NC MSA		
State	MSA	County
NC	Hickory-Lenoir-Morganton, NC MSA	Caldwell
		Catawba

Jacksonville, NC MSA		
State	MSA	County
NC	Jacksonville, NC MSA	Onslow
Raleigh-Durham-Cary, NC CSA		
State	MSA	County
NC	Raleigh-Cary, NC MSA	Johnston
		Wake
	Durham, NC MSA	Chatham
		Durham
		Orange
Rocky Mount, NC MSA		
State	MSA	County
NC	Rocky Mount, NC MSA	Edgecombe
		Nash
Wilmington, NC MSA		
State	MSA	County
NC	Wilmington, NC MSA	Brunswick
		New Hanover
		Pender
Avery		
State	MSA	County
NC	NA	Avery
		Mitchell
		Watauga
		Yancey
Bertie		
State	MSA	County
NC	NA	Bertie
		Camden
		Chowan
		Gates
		Halifax
		Hertford
		Martin
		Northampton
		Pasquotank
		Perquimans
		Washington
Carteret		
State	MSA	County

NC	NA	Carteret
		Columbus
		Craven
		Duplin
		Harnett
		Lee
		Lenoir
		Moore
		Richmond
		Robeson
		Sampson
		Scotland
Cherokee		
State	MSA	County
NC	NA	Cherokee
		Clay
		Jackson
		Macon
		Transylvania
Cleveland		
State	MSA	County
NC	NA	Cleveland
		Rutherford

Dare		
State	MSA	County
NC	NA	Dare
Granville		
State	MSA	County
NC	NA	Granville
		Vance
Iredell		
State	MSA	County
NC	NA	Iredell
Surry		
State	MSA	County
NC	NA	Surry
Wilson		
State	MSA	County
NC	NA	Wilson

Virginia Markets

Richmond, VA MSA		
State	MSA	County
VA	Richmond, VA MSA	Richmond City
Virginia Beach-Norfolk-Newport News, VA-NC MSA		
State	MSA	County
NC	Virginia Beach-Norfolk-Newport News, VA-NC MSA	Currituck
VA		Gloucester
		Isle of Wight
		James City
		Mathews
		York
		Chesapeake
		Hampton
		Newport News
		Norfolk
		Poquoson
		Portsmouth
		Suffolk city
		Virginia Beach
Williamsburg		

South Carolina Markets

Charleston-North Charleston, SC MSA		
State	MSA	County
SC	Charleston-North Charleston, SC MSA	Charleston
Columbia, SC MSA		
State	MSA	County
SC	Columbia, SC MSA	Lexington
		Richland
Florence, SC MSA		
State	MSA	County
SC	Florence, SC MSA	Florence
Greenville, SC MSA		
State	MSA	County
SC	Greenville, SC MSA	Greenville
Myrtle Beach-Conway-North Myrtle Beach, SC MSA		
State	MSA	County
SC	Myrtle Beach-Conway-North Myrtle Beach, SC MSA	Horry
Beaufort		
State	MSA	County
SC	NA	Beaufort
Georgetown		
State	MSA	County
SC	NA	Georgetown

Georgia Markets

Atlanta-Sandy Springs-Marietta, GA MSA		
State	MSA	County
GA	Atlanta-Sandy Springs-Marietta, GA MSA	Clayton
		Cobb
		Coweta
		DeKalb
		Douglas
		Fayette
		Forsyth
		Fulton
		Gwinnett
		Henry
Paulding		
Columbus, GA-AL MSA		
State	MSA	County
GA	Columbus, GA-AL MSA	Marion
Macon, GA MSA		
State	MSA	County
GA	Macon, GA MSA	Bibb
Dooly, GA nonMSA		
State	MSA	County
GA	NA	Dooly
		Macon
Polk, GA nonMSA		
State	MSA	County
GA	NA	Polk
Troup, GA nonMSA		
State	MSA	County
GA	NA	Troup

Alabama Markets

Auburn-Opelika, AL MSA		
State	MSA	County
AL	Auburn-Opelika, AL MSA	Lee
Birmingham-Hoover, AL MSA		
State	MSA	County
AL	Birmingham-Hoover, AL MSA	Jefferson
		St Clair
		Shelby
Huntsville-Decatur CSA		
State	MSA	County

AL	Huntsville, AL MSA	Limestone
		Madison
	Decatur, AL MSA	Morgan
Mobile, AL MSA		
State	MSA	County
AL	Mobile, AL MSA	Mobile
Montgomery, AL MSA		
State	MSA	County
AL	Montgomery, AL MSA	Autauga
		Elmore
		Montgomery
Tuscaloosa, AL MSA		
State	MSA	County
AL	Tuscaloosa, AL MSA	Tuscaloosa
Dallas, AL nonMSA		
State	MSA	County
AL	NA	Dallas
Baldwin, AL nonMSA		
State	MSA	County
AL	NA	Baldwin
Clay, AL nonMSA		
State	MSA	County
AL	NA	Clay
		Macon
		Talladega
		Tallapoosa

Florida Markets

Cape Coral-Fort Myers, FL MSA		
State	MSA	County
FL	Cape Coral-Fort Myers, FL MSA	Lee
Gainesville, FL MSA		
State	MSA	County
FL	Gainesville, FL MSA	Alachua
Miami-Fort Lauderdale-Pompano Beach, FL MSA		
State	MSA	County
FL	Miami-Miami Beach-Kendall, FL MD	Miami-Dade
	West Palm Beach-Boca Raton-Boynton Beach, FL MD	Palm Beach
	Fort Lauderdale-Pompano Beach-Deerfield, FL MD	Broward
Naples-Marco Island, FL MSA		
State	MSA	County
FL	Naples-Marco Island, FL MSA	Collier
Ocala, FL MSA		
State	MSA	County
FL	Ocala, FL MSA	Marion
Orlando-Deltona-Daytona Beach, FL CSA		

State	MSA	County
FL	Orlando-Kissimmee, FL MSA	Lake
		Orange
		Osceola
		Seminole
	Deltona-Daytona Beach-Ormond Beach, FL MSA	Volusia
	Palm Coast, FL MSA	Flagler
Palm Bay-Melbourne-Titusville, FL MSA		
State	MSA	County
FL	Palm Bay-Melbourne-Titusville, FL MSA	Brevard
Panama City-Lynn Haven, FL MSA		
State	MSA	County
FL	Panama City-Lynn Haven, FL MSA	Bay
Pensacola-Ferry Bass-Brent, FL MSA		
State	MSA	County
FL	Pensacola-Ferry Bass-Brent, FL MSA	Escambia
Port St. Lucie-Sebastian-Vero Beach, FL CSA		
State	MSA	County
FL	Port St. Lucie, FL MSA	St. Lucie
	Sebastian-Vero Beach, FL MSA	Indian River
Sarasota-Bradenton-Punta Gorda, FL CSA		
State	MSA	County
FL	Sarasota-Bradenton-Venice, FL MSA	Manatee
		Sarasota
	Punta Gorda, FL MSA	Charlotte
Tampa-St. Petersburg-Clearwater, FL MSA		
State	MSA	County
FL	Tampa-St. Petersburg-Clearwater, FL MSA	Hillsborough
		Pinellas

CRA APPENDIX F

GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.