

SCHEDULE B: COMMERCIAL LENDING (Millions \$)				Key	
	JAN-11	FEB-11	MAR-11		
1. C & I					
a. Average Total Loan and Lease Balance	\$22,829	\$22,819	\$22,698	C & I includes lease financing receivables, commercial and industrial loans, agricultural loans, loans to depository institutions and other nonconsumer loans.	March loan approvals increased from January and February levels, consistent with seasonal experience. The Institutional Bank segment experienced the highest new loan approval volume at \$670 million, followed by the Middle Market segment at \$371 million.
b. Renewal of Existing Accounts	\$668	\$745	\$968	Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw.	
c. New Commitments	\$683	\$588	\$1,559	New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$11,679	\$11,514	\$11,174	Commercial Real Estate includes construction and land loans, loans secured by multi-family residential properties and by other nonresidential properties.	March new commitment volume of \$95 million was comparable to that experienced in February 2011, but with activity more broadly spread across KeyCorp's lines of business. The Middle Market segment accounted for 35% of new volume followed by Business Banking at 27%, Real Estate Capital at 26% and Community Development at 9%. Renewals during the month were primarily within the Real Estate Capital segment.
b. Renewal of Existing Accounts	\$248	\$134	\$219	Renewals of existing accounts include outstanding balances and unused commitments for which the terms were extended or changed. A renewed commitment may or may not have an active draw.	
c. New Commitments	\$92	\$106	\$95	New commitments include outstanding balances and unused commitments. Commitment amounts exclude standby letters of credit.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$)					
4. Small Business Loans³					
a. Average Total Loan Balance	\$2,955	\$2,959	\$2,951	Small Business includes loans guaranteed by the Small Business Administration ("SBA") and other loans internally classified as small business loans.	New loans approved in March were strong at \$118 million, representing an 88% increase from the February level. March's approval level is the highest since May 2008. Loan demand improved across the KeyCorp footprint, with SBA approvals showing the strongest growth. SBA new loans approved in March represented 36% of total Small Business approvals. March loan renewals increased 42% from the February level to \$156 million due to expected seasonality of line renewals.
b. Originations	\$65	\$43	\$89		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$)					
1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$1	-\$472	-\$1,958	March mortgage backed securities ("MBS") net purchased volume includes \$0 billion in purchases, \$1.6 billion in sales, and \$.4 billion in paydowns, calls and maturities.	Security sales of \$1.6 billion along with no reinvestment of March paydown cashflows provided liquidity and addressed the funding requirements related to the loss of approximately \$1.5 billion of escrow deposits associated with KeyCorp's mortgage operations that were moved to another financial institution as a result of the previously reported ratings downgrade of KeyBank National Association by Moody's in November 2010.
b. Asset Backed Securities	\$0	\$0	\$0		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	N/A	N/A	N/A		
3. Underwriting					
a. Total Equity Underwriting	\$104	\$27	\$349	Represents KeyCorp's equity underwriting commitments.	KeyCorp was the co-manager on twelve equity deals, totaling \$349 million in underwriting commitments, compared to two deals totaling \$41 million in March 2010. Taxable debt underwriting consisted of thirteen deals totaling \$614 million in underwriting commitments, of which nine deals were investment grade and four were high yield. Municipal debt underwriting totaled \$43 million in underwriting commitments.
b. Total Debt Underwriting	\$289	\$221	\$657	Represents KeyCorp's taxable and municipal debt underwriting commitments.	
Notes:					
1. Not applicable if matched book activity does not exceed \$50 billion.					
2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.					
3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.					

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **KeyCorp**

Reporting month(s): **March 2011**

Submission date: **4/27/11**

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

PART II. QUALITATIVE OVERVIEW

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

Cleveland-based KeyCorp is one of the nation's largest bank-based financial services companies, with consolidated total assets of approximately \$90.4 billion at March 31, 2011. Through KeyBank and certain other subsidiaries, KeyCorp provides a wide range of retail and commercial banking, commercial leasing, investment management, consumer finance, and investment banking products and services to individual, corporate and institutional clients through two major business groups, Key Community Bank and Key Corporate Bank. Key Community Bank serves consumers and small to mid-sized businesses through the company's 14-state branch network, which is organized into three internally defined geographic regions: Rocky Mountains and Northwest, Great Lakes, and Northeast. Key Corporate Bank includes those corporate and consumer business units that operate nationally, within and beyond KeyCorp's 14-state branch network, as well as internationally.

General

KeyCorp's overall new loan applications increased in March from February's level. Loan application activity for Consumer loans continued to improve from 2010 levels in all areas with the exception of Mortgage loan refinancings, which have been impacted by the higher rate environment compared to last year. Commercial and Industrial ("C & I") and Small Business new loan approvals increased in March from February. Commercial Real Estate ("CRE") loan originations remained relatively stable during the past two months.

Consumer

March Consumer application volume was reflective of the typical seasonal increase in loan demand in the spring season. Originations continue to show improvement from the year-ago period, with exception of Mortgage activity, due to the current rate environment compared to last year.

C & I

C & I loan approval volume increased in March, led by strong increases in loan approvals for new and existing clients in the Institutional Bank, Middle Market and Leasing segments. Combined, those three areas generated loan approval volume of \$1.3 billion in March.

Commercial Real Estate

New Commercial Real Estate originations were in line with January and February originations and much higher than the comparable period in 2010. Originations, however, did not offset repayments, as reflected in the 3% decline in average loan and lease balances outstanding. New loan application volume continues to be attributable to the commercial banking segments (primarily in the Key Community Bank business group), indicating some demand from business owners investing in their own properties. Demand for financing of new real estate development projects remains constrained.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **KeyCorp**

Reporting month(s): **March 2011**

Submission date: **4/27/11**

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

Small Business

March's new loan approval level of \$118 million represents the highest approval volume since May 2008. SBA loan approvals showed the strongest growth from last month. SBA new loans approved in March represented 36% of total approvals, which is higher than the historic level of 24%. Loan demand has increased in all of KeyCorp's footprint regions. The application pipeline for owner-occupied real estate is at its highest level since 2008.

Investment Portfolio

KeyCorp continues to use the available-for-sale securities portfolio to support strategies for managing overall balance sheet liquidity and interest rate risk. In March, the size of KeyCorp's investment portfolio decreased by \$2.0 billion as a result of the sale of \$1.6 billion of securities along with a decision not to reinvest security cashflows during March. These actions provided liquidity and addressed the funding requirements related to the loss of approximately \$1.5 billion of escrow deposits associated with KeyCorp's mortgage operations that were moved to another financial institution as a result of the previously reported ratings downgrade of KeyBank National Association by Moody's in November 2010.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **Marshall & Ilsley Corporation** Submission date: **04/29/11** Person to be contacted about this report: **Gregory A. Smith**

PART I. QUANTITATIVE OVERVIEW

SCHEDULE A: CONSUMER LENDING (Millions \$)	2011			Key	Comments
	JAN	FEB	MAR		
1. First Mortgage					
a. Average Loan Balance (Daily Average Total Outstanding)	\$6,008	\$5,857	\$5,732	Includes all closed end residential RE; First Mortgages and Home Equity Loans (Approximately 80% of Home Equity Loans are held in first position). This excludes construction and vacant land loans which are included in the Commercial Real Estate section as average loan balances.	Mortgage originations continue to decrease, driven primarily by the decrease in refinance activity due to fixed rate mortgage rates rising over the last several months. Purchase originations have held relatively flat.
b. Total Originations	\$152	\$95	\$86		
(1) Refinancings	\$122	\$65	\$50		
(2) New Home Purchases	\$31	\$31	\$36		
2. Home Equity					
a. Average Total Loan Balance	\$2,482	\$2,460	\$2,423	Includes Home Equity Lines only.	Average Total Loan Balance was down month-over-month as paydowns continue to outpace new production. Originations were effectively flat while Total Used & Unused Commitments were down due to higher loan rates over the last several months.
b. Originations (New Lines+Line Increases)	\$22	\$20	\$20		
c. Total Used and Unused Commitments	\$4,524	\$4,510	\$4,482		
3. US Card - Managed					
a. Average Total Loan Balance - Managed	\$283	\$273	\$264	Includes Consumer Card only.	Average Balances decreased due to strong payment rates. New Account Originations increased month-over-month, aided by a branch promotion. Total Used and Unused Commitments remained effectively flat.
b. New Account Originations (Initial Line Amt)	\$7	\$6	\$12		
c. Total Used and Unused Commitments	\$1,331	\$1,338	\$1,336		
4. Other Consumer					
a. Average Total Loan Balance	\$928	\$927	\$943	Includes consumer PRA & LOCs. Subcategories include Auto Leases, Dealer Finance, Personal, Securities Loans, and Student Loans.	Balances and New Account Originations were up month-over-month, led by Dealer Finance.
b. Originations	\$42	\$42	\$55		

SCHEDULE B: COMMERCIAL LENDING (Millions \$)	JAN	FEB	MAR	Key	Comments
1. C & I					
a. Average Total Loan and Lease Balance	\$11,612	\$11,675	\$11,471	Includes A/R and Inventory, Dealer Commercial, Agricultural, IRB's and Muni, and Commercial Leases.	Average Balances decreased in March. Renewals decreased from February to March, reflecting variation in renewal cycles. New commitments decreased from February. Companies continue to defer capital expenditures, pay down debt, use internally generated cash and delay investments in infrastructure, all of which influences customer borrowing needs.
b. Renewal of Existing Accounts	\$153	\$172	\$122	Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established.	
c. New Commitments	\$117	\$89	\$38	Includes New Loans to New Customers and Unused Commitments to C&I (Also includes Unused Commitments to: Finance Agricultural Production and Other).	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$15,542	\$15,350	\$15,012	Includes Business Purpose 1-4 and Construction, Development, & Vacant Land (Commercial and Residential).	Continuing with past monthly trends, Commercial Real Estate Average Balances decreased month-over-month led by Construction and Development loans. Renewals were higher month-over-month, reflecting variation in renewal cycles. Commercial Real Estate Average Balances are expected to continue contracting due to portfolio amortization.
b. Renewal of Existing Accounts	\$28	\$48	\$53	Renewals include renewal of existing accounts where new money is requested, terms are modified, or new master line is established.	
c. New Commitments	\$11	\$15	\$12	Includes New Loans to New Customers and Unused Commitments for CRE (Also includes Unused Commitments to: New Construction, Land Development and Other Land; Farmland; 1-4 Family Residential Properties; Multi-Family (5 or more) Residential Properties).	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$)					
4. Small Business Loans³					
a. Average Total Loan Balance	\$3,010	\$2,976	\$2,912	Includes SBA-guaranteed loans and Business Loans & Commitments < \$1 million to customers with Revenue < \$1 million. Excludes Letters of Credit.	Average Total Loan Balance decreased month-over-month led by Commercial Real Estate Loans. March Originations were higher than February, led by Commercial Real Estate-Consumer. Pipelines and Originations remain at historically low levels due to decreased demand as customers continue to address impacts from current economic conditions.
b. Originations	\$12	\$11	\$14		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$)					
1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$1	\$1	\$1	Includes Mortgage Backed security purchase activities net of any security MBS sale activities, within the consolidated investment holdings. At Qtr-end this may also include Traded-not-settled transactions.	
b. Asset Backed Securities	\$0	\$0	\$0		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	N/A	N/A	N/A		
3. Underwriting					
a. Total Equity Underwriting	N/A	N/A	N/A		
b. Total Debt Underwriting	N/A	N/A	N/A		
Notes:					
1. Not applicable if matched book activity does not exceed \$50 billion.					
2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.					
3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.					

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): March 2011

Submission date: 04/29/2011

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

PART II. QUALITATIVE OVERVIEW

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

Marshall & Ilsley Corporation (NYSE: MI) (M&I) is a diversified financial services corporation headquartered in Milwaukee, Wis. M&I Marshall & Ilsley Bank is the largest Wisconsin-based bank, with 188 offices throughout the state. In addition, M&I has 53 locations throughout Arizona; 36 offices along Florida's west coast and in central Florida; 33 offices in Indianapolis and nearby communities; 26 offices in metropolitan Minneapolis/St. Paul, and one in Duluth, Minn.; 17 offices in the greater St. Louis area; 15 offices in Kansas City and nearby communities; and one office in Las Vegas, Nev. M&I also provides trust and investment management, equipment leasing, mortgage banking, asset-based lending, financial planning, investments, and insurance services from offices throughout the country and on the Internet (www.mibank.com or www.micorp.com).

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

The communities and customers M&I serves continue to face impacts from the current recessionary conditions of the economy. Nonetheless, M&I extended approximately \$325 million of new credit to new and existing customers in March for a total of over \$11.6 billion since the infusion of CPP capital in mid-November 2008 (The "new credit" amount includes new and expanded extensions of credit, or commitments to extend credit, as well as renewals of existing credit where a new promissory note was executed). Included in the figures above are small business new credit extensions of \$16 million in March and over \$789 million since receipt of CPP capital. ("Small business" includes: (1) SBA-guaranteed loans and (2) Commercial purpose loans where the original note amount was \$1 million or less, outstanding commitments were \$1 million or less and the customer had (recorded) revenue of \$1 million or less). Additionally, M&I has a franchise-wide foreclosure moratorium program. The moratorium is on all owner-occupied residential loans for customers who agree to work in good faith to reach a successful repayment agreement.

In Commercial and Industrial loans, current line utilization from existing customers decreased reflecting lower working capital needs. Customers continue to resize their revolving credit facilities to match working capital needs.

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

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: Marshall & Ilsley Corporation

Reporting month(s): March 2011

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

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

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: Regions Financial Corporation

Submission date: April 29, 2011

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

PART I. QUANTITATIVE OVERVIEW

SCHEDULE A: CONSUMER LENDING (Millions \$)

	<u>2011</u>			<u>Key</u>	<u>Comments</u>
	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>		
1. First Mortgage					
a. Average Loan Balance (Daily Average Total Outstanding)	\$15,998	\$15,906	\$15,640	First and second residential 1-4 family mortgages, including residential mortgages held for sale.	The mortgage division originated mortgage loans totaling \$502 million in March 2011. Overall production increased 6% from the prior month. New purchase originations increased 37% from prior month, and refinancing activity decreased from the prior month 14%. Application activity in March increased 28% as compared to prior month.
b. Total Originations	\$581	\$473	\$502	Loan originations designated for the secondary market and those to be held in portfolio on Regions' balance sheet.	
(1) Refinancings	\$413	\$287	\$247	Total originations designated as refinance status.	
(2) New Home Purchases	\$168	\$186	\$255	Total originations designated as new purchase status.	
2. Home Equity					
a. Average Total Loan Balance	\$14,169	\$14,052	\$13,939	Average balances include Home Equity loans and HELOCs.	Home Equity average balances declined \$112.5MM or 0.8% in March to \$13.9B. The HELOAN portfolio declined \$13.3MM, 0.91%, while HELOC balances declined \$99.2MM or 0.8%. Portfolio run-off continues as payoffs/paydowns outpace production.
b. Originations (New Lines+Line Increases)	\$63	\$90	\$110	New Home Equity loans, lines and increases.	
c. Total Used and Unused Commitments	\$23,233	\$23,104	\$22,971	Total portfolio of Home Equity loans and funded and unfunded HELOCs. Funded portion included in average balance above.	
3. US Card - Managed					
a. Average Total Loan Balance - Managed	N/A	N/A	N/A	N/A - Regions Financial Corp is an Agent Bank.	N/A
b. New Account Originations (Initial Line Amt)	N/A	N/A	N/A		
c. Total Used and Unused Commitments	N/A	N/A	N/A		
4. Other Consumer					
a. Average Total Loan Balance	\$2,834	\$2,838	\$2,836	Includes consumer direct, indirect, other revolving (i.e., overdraft lines) and student loans held for sale.	March Other Consumer Lending balances were flat with February at \$2.8B. Balances are being favorably impacted by the re-entry of Indirect Lending offset by the continued run-off of the legacy Indirect Lending portfolio as well as continued student loan sales.
b. Originations	\$124	\$121	\$141	Includes direct and student lending origination activity.	

SCHEDULE B: COMMERCIAL LENDING (Millions \$)					
1. C & I	Jan	Feb	Mar	Key	Comments
a. Average Total Loan and Lease Balance	\$35,225	\$35,434	\$35,482	Average outstanding funded balances (net of deferred fees and costs) for commercial related loans and leases. Also includes owner-occupied commercial real estate mortgage and construction loans made to operating businesses.	Loan demand in the middle market, while somewhat soft by historical standards, picked up some momentum throughout the fourth quarter and into 2011. The stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$48 million in March as compared to February levels. Commercial line utilization rates remained flat in March as compared to February.
b. Renewal of Existing Accounts	\$1,619	\$1,331	\$2,231	Renewal of existing funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of renewal. Also includes letters of credit.	
c. New Commitments	\$1,167	\$869	\$1,299	New funded and unfunded commitments for commercial and owner-occupied real estate related loans based upon posting date of the commitment. Also includes letters of credit and leases. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$16,053	\$15,793	\$15,509	Average outstanding funded balances (net of deferred fees and costs) for commercial investor-owned real estate related loans. Also includes Commercial loans held for sale.	In March, commercial real estate balances decreased \$284 million from February levels. In March, new loan demand remained low. Developers are reluctant to begin new projects or purchase existing projects under current economic conditions. The focus in commercial real estate lending is on renewing and restructuring real estate loans with existing clients. Renewal activity includes loan restructuring, remarking and repricing, consistent with the current credit quality of the sponsor, the performance of the project and the current market.
b. Renewal of Existing Accounts	\$751	\$566	\$1,137	Renewal of existing funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of renewal. Also includes letters of credit.	
c. New Commitments	\$5	\$65	\$34	New funded and unfunded commitments for commercial investor-owned real estate related loans based upon posting date of the commitment. Also includes letters of credit. Variable Rate Demand Note (VRDN) fundings are excluded from new commitment activity.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$)					
4. Small Business Loans³					
a. Average Total Loan Balance	\$13,092	\$12,996	\$12,977	Average outstanding funded balances (net of deferred fees and costs) for commercial and commercial real estate related loans made to small business clients, which we generally define as clients with revenues up to \$20 million. These balances are reflected as components of C&I, Commercial Real Estate and First Mortgage reported above.	We expect small business demand to pick up modestly with improvement in capital investment as consumer spending has shown recent signs of improvement. We still believe business owners will remain cautious about adding jobs and expansion even as sales and profits pick up.
b. Originations	\$568	\$561	\$647	New and renewed production of funded and unfunded commitments made to small business clients, which we generally define as clients with revenues up to \$20 million. These originations are reflected as components of C&I and Commercial Real Estate reported above.	
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$)					
1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$1,535	\$735	-\$138		Net purchase volume as captured in bond accounting system. Reflects settlement date. Consists of Government and Agency Fixed-Rate Mortgage-Backed Products. The Asset Backed securities consist of Non-Agency Commercial Mortgage Backed products.
b. Asset Backed Securities	\$0	\$82	\$65		
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	N/A	N/A	N/A		
b. Average Total Debit Balances ²	\$1,263	\$1,231	\$1,196	Reflects average margin receivables as recorded on the general ledger.	
3. Underwriting					
a. Total Equity Underwriting	\$16	\$145	\$192	Total equity underwriting activity. Represents Regions' participation percentage.	The Morgan Keegan Equity department participated in 4 offerings during January 2011, 9 during February 2011, and 13 during March 2011. Gross debt issuance for January, February, and March was \$15 billion, \$9.9 billion, and \$3.6 billion respectively.
b. Total Debt Underwriting	\$378	\$435	\$652	Debt issuances delivered monthly. Represents Regions' participation percentage.	
Notes:					
1. Not applicable if matched book activity does not exceed \$50 billion.					
2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.					
3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.					

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **Regions Financial Corporation**

Reporting month(s): March 2011

Submission date: **April 29, 2011**

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

PART II. QUALITATIVE OVERVIEW

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

I. Company Description

Regions Financial Corporation (“Regions” or the “Company”) is a financial holding company headquartered in Birmingham, Alabama, which operates throughout the South, Midwest and Texas. Regions provides traditional commercial, retail and mortgage banking services, as well as other financial services in the fields of investment banking, asset management, trust, securities brokerage, insurance and other specialty financing. At March 31, 2011, Regions had total consolidated assets of approximately \$132 billion.

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

II. Overall Summary

In March, new and renewed commitments increased by \$1.9 billion to \$5.5 billion for the month, while average balances declined \$0.6 billion from February to \$83.4 billion.

The month over month increase in new and renewed commitments was driven by a \$0.9 billion increase in C&I renewals, a \$0.4 billion increase in C&I new commitments, and a \$0.5 billion increase in Commercial Real Estate renewals.

III. Consumer Lending

A. Mortgage Lending

The mortgage division originated mortgage loans totaling \$502 million in March 2011. Overall production increased 6% from the prior month. New purchase originations increased 37% from prior month, and refinancing activity decreased from the prior month 14%. Application activity in March increased 28% as compared to prior month.

Regions’ mortgage division rolled out the U.S. Treasury sponsored Home Affordable Refinance Program (HARP) in late March 2009, which provides borrowers who have an existing loan owned or securitized by Fannie Mae or Freddie Mac, the ability to refinance to more beneficial financing terms with no new or additional mortgage insurance required, even if their current loan-to-value ratio is higher than it was on the original loan. The loan-to-value ratio cannot exceed 125%. March originations included approximately \$37.4 million related to 245 loans refinanced under the Home Affordable Refinance Program.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **Regions Financial Corporation**

Reporting month(s): March 2011

Submission date: **April 29, 2011**

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

Regions' has implemented the U. S. Treasury sponsored Home Affordable Modification Program (HMP) for FNMA/FHLMC loans serviced by Regions. This program is designed to assist mortgage borrowers who have an existing loan owned or securitized by Fannie Mae or Freddie Mac, and who are in imminent danger of default or are already in default to obtain modified financing terms prescribed by the program. On March 26, 2010, the U.S. Treasury announced program modifications to the existing HMP program. These program modifications are designed to expand flexibility for mortgage servicers and originators to assist more unemployed homeowners and to help more people who owe more on their mortgage than their home is worth because their local markets saw large declines in home values. In accordance with the program guidelines, Regions has distributed approximately 2,326 modification packages to eligible borrowers subject to a ninety-day trial period. The first modifications under this program were seen in July 2009. In the month of March, Regions completed 75 modifications totaling \$11 million in unpaid principal. Regions currently services approximately \$ 25.7 billion of Agency mortgages.

B. Home Equity Lending

Home Equity production increased 22% to \$110MM from prior month and increased 7% versus same period prior year as a result of increased bookings from the January branch loan focus week combined with seasonality. Equity Lending activities for March included: branch loan focus week including call nights activities, daily pre-approved point of sale Equity offers at DDA account opening, pre-approved direct mail offer with lead lists to the branches, payment savings/utilization mailing to existing customers as well as continued momentum from targeting the lending needs of customers that do not qualify for the traditional HELOC product but are NOT considered subprime borrowers.

Overall Home Equity average balances declined \$112.5MM or 0.8% in March to \$13.9B. The HELOAN portfolio declined \$13.3MM, 0.91%, while HELOC balances declined \$99.2MM or 0.8%. Portfolio run-off continues as payoffs/paydowns outpace production.

C. Other Consumer Lending

Other Consumer Lending production increased 17% in March to \$141.4MM from prior month and increased 18% versus same period prior year due in part to seasonality and continued momentum from our re-entry into Indirect Auto Lending. Other Consumer Lending activities for March included: continued expansion of the Indirect Auto Lending sector to 788 active dealerships, daily pre-approved point of sale Auto/Unsecured LOC offers at DDA account opening; pre-approved direct mail offer with lead lists to the branches, and continued momentum from targeting the lending needs of customers that do not qualify for traditional credit products but are NOT considered subprime borrowers.

Overall, March Other Consumer Lending balances were flat with February at \$2.8B. Balances are being favorably impacted by the re-entry of Indirect Lending offset by the continued run-off of the legacy Indirect Lending portfolio as well as continued student loan sales.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **Regions Financial Corporation**

Reporting month(s): March 2011

Submission date: **April 29, 2011**

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

D. Customer Assistance Program

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

As a result, Regions has taken steps including renegotiating the terms of mortgages and home equity loans, keeping families in their homes and allowing Regions to maintain a foreclosure rate well below industry average for residential first mortgages. Overall, the number of Regions serviced first mortgage loans in the foreclosure process is less than half the national average. (1.92% for Regions vs. 4.63% nationally in the fourth quarter of 2010.) Since inception of the program, Regions has restructured more than \$3.1 billion in mortgages, including \$53 million in March 2011. Regions has assisted more than 35,000 homeowners with solutions.

In addition, Regions introduced the U.S. Treasury sponsored Home Affordable Modification Program for loans serviced on behalf of Fannie Mae and Freddie Mac back in late March 2009. To date, we have initiated 2,326 trial period modifications for \$352 million and of those 1,589 have been completed for \$241 million.

IV. Commercial Lending

A. Commercial and Industrial Lending

Loan demand in the middle market, while somewhat soft by historical standards, picked up some momentum throughout the fourth quarter and into 2011. The stagnant economy continues to drive more conservative leverage positions; however, more robust loan demand is seen in the upper end of the market and in certain industries. Outstanding loan balances increased \$48 million in March as compared to February levels. Commercial line utilization rates remained flat in March as compared to February.

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

We expect small business demand to pick up modestly with improvement in capital investment as consumer spending has shown recent signs of improvement. We still believe business owners will remain cautious about adding jobs and expansion even as sales and profits pick up. Small business line utilization rates decreased slightly in March as compared to February.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **Regions Financial Corporation**

Reporting month(s): March 2011

Submission date: **April 29, 2011**

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

B. Commercial Real Estate Lending

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

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

V. Treasury Activities

Management of interest rate risk is among the most fundamental tenets in banking. Banking institutions utilize the Available for Sale investment portfolio as a primary tool to balance the inherent interest rate risk arising from core banking activities. Agency Mortgage-Backed securities provided an efficient means to offset asset sensitivity and maintain the desired liquidity profile, while offering a compelling risk adjusted return on the use of capital. Mortgage-Backed security activity in March totaled \$-137.96 million, which consists of Government and Agency Fixed-Rate Mortgage-Backed Products. Asset-Backed security activity in March totaled \$65.2 million, which consisted of Non-Agency Commercial Mortgage Backed products.

VI. Equity and Debt Activities at Morgan Keegan

March was a busy month for Equity issuance, both for the "street" and for Morgan Keegan. The dollars raised in March haven't been seen since March 2000. There were 103 equity offerings with Morgan Keegan being in thirteen. The REIT sector had the highest deal count, seeing 20 transactions completed. Even though the March Debt issuance was much lower than last year, the volume increased significantly over the first two months of 2011 and we expect that increase to continue into April. Conversely, we expect corporate underwriting to remain strong for the foreseeable future due to a continued favorable rate environment and tightening spreads.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: SunTrust Banks, Inc.		Submission date: 04/29/11		Person to be contacted about this report: Craig Smith		
PART I. QUANTITATIVE OVERVIEW						
SCHEDULE A: CONSUMER LENDING (Millions \$)		<u>2011</u> <u>JAN</u>	<u>2011</u> <u>FEB</u>	<u>2011</u> <u>MAR</u>	Key	Comments
<u>1. First Mortgage</u>						
a. Average Loan Balance (Daily Average Total Outstanding)	\$32,525	\$32,200	\$31,505	Consists of (1-4 family) residential whole loans and closed end loans secured by junior liens originated as part of a home purchase or refinance transactions. Includes loans retained in SunTrust's loan portfolio and loans currently recorded in loans held for sale.	Originations decreased 1% from prior month to \$1.7 billion in March 2011. March refinancings decreased while originations for new purchases increased. Average balances decreased \$695 million in March.	
b. Total Originations	\$2,284	\$1,746	\$1,721			
(1) Refinancings	\$1,798	\$1,271	\$1,008			
(2) New Home Purchases	\$486	\$475	\$713			
<u>2. Home Equity</u>						
a. Average Total Loan Balance	\$16,461	\$16,192	\$16,051	Average balance, originations, and commitments include both Home Equity Lines and Home Equity Loans.	Average balances outstanding decreased 1% in March. Originations increased \$46 million compared to February. The average line utilization rate decreased slightly to 54%.	
b. Originations (New Lines+Line Increases)	\$127	\$114	\$160			
c. Total Used and Unused Commitments	\$30,236	\$30,060	\$29,894			
<u>3. US Card - Managed</u>						
a. Average Total Loan Balance - Managed	\$1,024	\$998	\$1,014	Purchases drawn against SunTrust consumer and commercial credit card lines of credit are booked in the calendar month transacted.	March originations increased to \$34 million. Total line commitments and usage declined slightly from February. Average line utilization remained stable at 28% compared to February.	
b. New Account Originations (Initial Line Amt)	\$18	\$20	\$34	SunTrust issues both commercial and consumer credit card lines of credit. New line commitments are recognized when approved and cards are issued.		
c. Total Used and Unused Commitments	\$3,648	\$3,625	\$3,610	This is the line commitment total for all credit card accounts of record.		
<u>4. Other Consumer</u>						
a. Average Total Loan Balance	\$16,197	\$16,255	\$16,231	Average balances and originations include student loans, direct installment loans (auto and non-auto), indirect installment loans (auto and marine), and unsecured personal credit lines.	Average balances decreased fractionally compared to February. Other Consumer originations decreased \$18 million, or 3%, compared to February.	
b. Originations	\$502	\$544	\$526			

SCHEDULE B: COMMERCIAL LENDING (Millions \$)	JAN	FEB	MAR	Key	Comments
1. C & I					
a. Average Total Loan and Lease Balance	\$34,491	\$34,542	\$35,042	Includes average outstandings for Commercial & Industrial loans and leases extended to small business, commercial, middle market, and large corporate clients.	Average loan balances increased \$500 million, or 1%, compared to February. March originations of new commitments increased 75% compared to February while renewing credit facilities decreased 5% compared to February.
b. Renewal of Existing Accounts	\$921	\$1,152	\$1,095	Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives.	
c. New Commitments	\$1,343	\$1,100	\$1,926	Includes new facilities, stand-alone notes, and leases extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives.	
2. Commercial Real Estate					
a. Average Total Loan and Lease Balance	\$17,898	\$17,646	\$17,388	Includes commercial loans secured by owner occupied or non-owner occupied real estate. Includes loans extended for real estate financing as well as loans made for other purposes and collateralized by real estate.	Commercial real estate average balances declined \$258 million in March compared to February. Loan demand has remained soft. There was a \$143 million increase in March originations of new and renewing credit facilities resulting in a 40% increase compared to February.
b. Renewal of Existing Accounts	\$177	\$198	\$288	Renewals represent credit facilities and stand-alone notes that matured and were renewed during the reporting period. Includes funded loans and unfunded commitments, but does not include letters of credit or derivatives.	
c. New Commitments	\$151	\$163	\$216	Includes new facilities and stand-alone notes extended to new or existing clients. Reflects both funded loans and unfunded commitments. Does not include takedowns under existing commitments, letters of credit, or derivatives.	
SCHEDULE C: MEMORANDA - SMALL BUSINESS LENDING (Millions \$)					
4. Small Business Loans³					
a. Average Total Loan Balance	\$4,776	\$4,877	\$4,844	Average balances and originations include loans originated in the business banking group which includes loans guaranteed by the SBA. Business Banking primarily serves clients with annual sales of \$5 million or less.	Average loan balances decreased \$33 million, or less than 1%, compared to February. Originations declined slightly to \$37 million in March.
b. Originations	\$30	\$41	\$37		
SCHEDULE D: OTHER INTERMEDIATION ACTIVITIES (Millions \$)					
1. MBS/ABS Net Purchased Volume					
a. Mortgage Backed Securities	\$913	\$1,015	\$2,765	The numbers represent net purchase volume within the reporting period. These securities are reported in SunTrust's available-for-sale and trading portfolios.	In March, SunTrust purchased \$2.8 billion of U.S. government and agency issued mortgage-backed securities and \$27 million of asset-backed securities as part of a repositioning of the investment portfolio.
b. Asset Backed Securities	-\$37	-\$8	\$27	The numbers represent net purchase volume within the reporting period. These figures include securities reported in SunTrust's available-for-sale and trading portfolios.	
2. Secured Lending (Repo, PB, Margin Lending)					
a. Average Total Matched Book (Repo/Reverse Repo) ¹	n/a	n/a	n/a	SunTrust Bank has less than \$50 billion in matched book repos. SunTrust Robinson Humphrey "STRH", an institutional broker dealer, is fully disclosed on the equity side through a third party service provider and does not hold customer accounts.	
b. Average Total Debit Balances ²	n/a	n/a	n/a	Although STRH self-clears institutional fixed income transactions, STRH does not carry customer accounts.	
3. Underwriting					
a. Total Equity Underwriting	\$8	\$7	\$441	Includes total dollars allocated to STRH in equity underwriting transactions that settled within the reporting period.	Total debt underwriting consisted of investment-grade debt of \$700 million, including \$400 million of notes issued by SunTrust Banks, Inc. Additional underwriting in March included municipal debt of \$53 million and high-yield debt of \$190 million. Equity underwriting transactions for March totaled \$441 million, including \$260 million related to the Company's common stock offering.
b. Total Debt Underwriting	\$881	\$414	\$943	Includes total dollars allocated to STRH in investment grade fixed income, high yield fixed income, and municipal debt underwriting transactions that settled within the reporting period.	
Notes:					
1. Not applicable if matched book activity does not exceed \$50 billion.					
2. Applicable only for institutions offering prime brokerage or other margin lending services to clients.					
3. Memoranda: these loans are already accounted for in either consumer lending, commercial lending, or a combination of both, and include loans guaranteed by the Small Business Administration and/or any other loans that are internally classified as small business loans.					

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **SunTrust Banks, Inc.**
Reporting month(s): March 2011
Submission date: 04/29/11
Person to be contacted regarding this report: **Craig Smith**

PART II. QUALITATIVE OVERVIEW

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

SunTrust Banks, Inc., with total assets of \$170.8 billion on March 31, 2011, is one of the nation's largest financial holding companies. Through its banking subsidiaries, the Company provides deposit, credit, trust, and investment services to a broad range of retail, business, and institutional clients. Other subsidiaries provide mortgage banking, brokerage, investment management, equipment leasing, and capital market services. SunTrust operates 1,665 retail branches in Alabama, Arkansas, Florida, Georgia, Maryland, Mississippi, North Carolina, South Carolina, Tennessee, Virginia, West Virginia, and the District of Columbia. In addition, SunTrust services clients in select markets nationally.

Average loans in March, including loans held for sale, totaled \$117.2 billion, declining \$0.6 billion from February. These totals do not include loans extended to clients and sold to third parties. This fact is particularly relevant when considering the mortgage portfolio, since the majority of new originations and refinanced mortgage loans are sold to third parties. Total new loan originations, commitments, and renewals extended to all borrowers in March totaled \$6 billion, an increase of 18% from February, driven mostly by increased Commercial activity.

Consumer Lending

Mortgage originations totaled \$1.7 billion during March, representing a 1% decrease from February. Mortgage refinancings decreased in March by 21%, while loans funded for new home purchases increased in March by 50% relative to February. Total average mortgage balances declined \$695 million, or 2%, compared to February.

Home equity total used and unused commitments decreased \$166 million representing a decrease of 1% from February. Total equity loan and line originations increased 40% to \$160 million in March and average home equity loan balances declined \$141 million, or 1%, compared to February.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **SunTrust Banks, Inc.**

Reporting month(s): March 2011

Submission date: 04/29/11

Person to be contacted regarding this report: **Craig Smith**

Credit card balances represent a small percentage of SunTrust's loan portfolio and drive a relatively immaterial percentage of SunTrust's total annual loan originations. In March, new credit card originations totaled \$34 million, with \$25 million related to new consumer accounts and \$9 million related to new business accounts.

Other Consumer loans are primarily composed of student, auto, and other loans. Average Other Consumer loan balances decreased fractionally by \$24 million during March and indirect auto, student, and other consumer loan originations decreased \$182 million, or 3%, compared to February.

Commercial Lending

Average C&I loan balances increased \$500 million in March. Total Commercial Lending new commitments and renewals were \$3 billion in March, a 34% increase from February. Renewals of existing credit facilities and stand-alone notes totaled \$1.1 billion in March, a decrease of 5% from February. Combined new credit facilities, notes and leases increased in March by \$826 million, or 75%, compared to February. C&I originations and renewals are often impacted by client timing preferences and seasonality.

Commercial Real Estate

Average Commercial Real Estate loans decreased \$258 million, or 1%, compared to the February average. New residential home builder loan demand was negligible and demand for commercial development projects remained low as property values remained depressed and investment activity was limited. In March, Commercial Real Estate renewals of existing accounts increased \$90 million, or 45%, and new Commercial Real Estate commitments grew \$53 million, or 33%, compared to February.

Small Business Lending

Most small business loans are originated in the business banking group which primarily serves clients with annual sales of \$5 million or less. In March, the average loan balance was \$4.8 billion, down 1% from February. March originations totaled \$37 million, decreasing \$4 million, or 10%, compared to February.

TREASURY MONTHLY INTERMEDIATION SNAPSHOT

Name of institution: **SunTrust Banks, Inc.**

Reporting month(s): March 2011

Submission date: 04/29/11

Person to be contacted regarding this report: **Craig Smith**

Other Intermediation Activities

Beyond lending to consumers and businesses, SunTrust participates in various additional intermediation activities. In March, SunTrust purchased \$2.8 billion of U. S. government and agency issued mortgage-backed securities and \$27 million of asset-backed securities as part of a repositioning of the investment portfolio.

SunTrust participated in twenty-two debt issues in March with a total notional value of \$9.6 billion.

SunTrust's allocation of underwritten debt included \$700 million in investment-grade issues, including \$400 million of notes issued by SunTrust Banks, Inc. Additional underwriting in March included municipal debt of \$53 million and high-yield debt of \$190 million. Total debt underwriting in March increased \$529 million compared to February.

In March, SunTrust participated in seven equity offerings with a total notional value of \$7.3 billion, of which our allocation was \$441 million, including \$260 million related to the Company's common stock offering.