

Moody's Proposed Enhancements to U.S. Residential Mortgage Securitizations: Call for Comments

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SUMMARY OPINION:

As the turmoil in the credit markets has continued, Moody's has actively engaged in an ongoing and in-depth dialogue with mortgage originators, fixed income investors, investment bankers, oversight authorities and policymakers on feasible steps to improve transparency in the residential mortgage market. To that end, in addition to making numerous changes to its rating methodologies and models, on September 25, 2007, Moody's proposed broad enhancements¹ designed to strengthen the securitization process in the U.S. for non-prime residential mortgages. Our comments are focused on the U.S. RMBS market given that the vast majority of subprime issuance and their associated problems have occurred in the U.S. Based on our assessment of factors that have led to recent underperformance of subprime and Alt A mortgage securitizations, we believe that implementation of these enhancements will materially improve performance of future mortgage securitizations.

In its discussions with market participants, Moody's has found general agreement with its proposals. Market participants also acknowledge that the enhancements should apply to prime as well as non-prime securitizations. Utilizing that feedback, Moody's is now proposing the following, more specific enhancements to improve transparency, data integrity, and accountability:

- Stronger representations and warranties
- Independent third-party pre-securitization review of underlying mortgage loans
- Standardized post-securitization forensic review
- Expanded loan-level data reporting of initial mortgage pool and ongoing loan performance
- More comprehensive originator assessments

These five enhancements are intended to work together to provide more standard and reliable information on residential mortgage-backed securities (RMBS) transactions than that currently available. Moody's ability to rate a particular RMBS or assign a high or investment grade rating will depend in part upon the degree to which issuers incorporate these enhancements.

With this report, we are asking for feedback, observations, and suggestions on these proposals from market participants, industry trade organizations and oversight authorities, with whom we continue to work. Please forward your comments on or before April 11, 2008 to cpc@moodys.com.

¹ See "[Moody's Proposes Enhancements to Non-Prime RMBS Securitization](#)," *Moody's Structured Finance*, September 25, 2007.



Stronger Representations and Warranties

Moody's recommends a more robust and more standardized set of issuer representations and warranties than has typically been the case in RMBS transactions. In addition to current representations and warranties that pertain to the legality and enforceability of loans in RMBS transactions, Moody's suggests that issuers also more explicitly address fraud, misrepresentation, data quality, early payment defaults and adherence to underwriting guidelines.

Moody's also proposes that issuers make representations and warranties as to how diligently they sought to ascertain critical elements of the underlying loans such as property valuation, borrower income and employment, and property occupancy status.

Moody's may not assign its highest investment grade ratings or may decline to rate transactions in which the party making the representations and warranties does not substantively provide the representations and warranties set forth in **Appendix A** or does not have meaningful financial resources with which to honor its repurchase obligations for loans found to be in breach of the representations and warranties.

Independent Third-Party Pre-Securitization Review of the Underlying Loans

Moody's recommends that the issuer or underwriter engage an independent third party to review a combination of adverse and random samples of loans for each mortgage pool in the transaction. The minimum sample size should be the greater of 5% or 100 loans for prime deals and the greater of 10% or 200 loans for Alt-A and subprime transactions.

Where less than the entire pool is reviewed, Moody's will make a statistical inference as to the composition of the entire pool based on the sample results of the third-party review. Based on the resultant pool composition, Moody's may make adjustments to its model inputs or adjust loss coverage levels for a given rating. In some cases, Moody's may decide not to assign its highest investment grade ratings to a given security or may decline to rate the transaction.

In its rating assessment, Moody's will take into consideration the credit, property valuation, regulatory compliance, and other evaluations and grades assigned by the third-party reviewer. Loan-level data ascertained by the third-party reviewer should be transmitted from the issuer or underwriter to Moody's, including but not limited to the credit, property valuation, compliance and overall grades as well as the values determined by the third-party reviewer for occupancy, borrower income, collateral value, and debt-to-income ratio. For loans that do not comply with one or more of the originator's underwriting guidelines (so-called "exception loans"), Moody's should also receive information as to the type of exception made and any related factor that was considered by the originator to offset or compensate for the risk of the guideline exception (a so-called "compensating factor"). Moody's recommends that pre-securitization results also be made available to investors.

In addition to the third-party review, Moody's may request to have loans evaluated by one or more fraud software tools available in the market. These tools offer another method of affirming data quality and our inferences on the pool from the sample review.

As mentioned above, Moody's will consider the financial strength and reputation of the representation and warranty provider as part of our credit assessment. As the sample size of the pre-securitization review increases and becomes closer to that of the entire pool, the credit impact of the financial strength of the representations and warranties provider will lessen to some extent.

Standard Post-Securitization Forensic Review

Moody's recommends that during the first 18 months of a securitization's life, an independent third party conduct a forensic review of any loan that becomes 120 days or more delinquent, enters a foreclosure proceeding, or enters bankruptcy. The reviewing party should be independent of the issuer, sponsor, servicer and underwriter of the securitization. For example, a reviewer might be a due diligence firm, credit risk manager, accounting firm, trustee or master servicer. Additionally, the forensic reviewer should be named as a party to the transaction and therefore be contractually obligated to perform the review and report the results.

The purpose of the post-securitization review is to determine whether any of the representations and warranties made to the securitization trust had been breached. The findings of the review should be reported as part of the monthly investor remittance report. The report should detail the number of loans with repurchase requests as determined by the third-party reviewer and the number of such loans actually repurchased by each provider of representations and warranties in the transaction.

Expanded Loan-level Data of Initial Mortgage Pool and On-going Loan Performance

We will be expanding our data standards as soon as practical in 2008 based on feedback from industry participants and trade associations with whom we are currently working to determine the timing and feasibility of obtaining these fields. Our current list of proposed data fields (including both existing and new data fields which are subject to change) is shown in Appendix B.

The additional data fields will help increase the parity of information between Moody's and the originator. Two levels of data are requested. Level One data is most critical to our evaluation of loan performance. A lack of data in this category would likely result in much higher credit enhancement for a given rating category. In some cases, we would not assign a high or investment grade rating or might elect not to rate a transaction if this information is not available. Level Two data is less crucial, but these fields help to substantiate other data fields within the loan record. Failure to provide data in this category will likely cause us to ascribe a higher degree of uncertainty to the data we are analyzing, with a concomitant increase in loss coverage levels, but would not necessarily lead to a limit on our ratings.

In addition to information about the characteristics of the loans at the closing of the transaction, we are also requesting that servicers provide monthly post-closing loan level performance data for each securitization. The requested fields are listed in Appendix C.

Moody's believes that the market will benefit from standardization of data file formats and data field definitions. We look forward to participating further in industry discussions to facilitate adoption of industry practices that improve information transparency.

More Comprehensive Originator Assessments

When rating RMBS, Moody's considers and incorporates into its ratings assessment the quality and capacity of the originator. As part of Moody's originator assessments, the originator's policies and procedures are reviewed, as well as the historical performance of its loans. Moody's has frequent dialogues with originators about origination trends and practices, and conducts on-site operations reviews. For each originator, Moody's reviews the strength of its origination channels, the robustness of its policies and procedures, including underwriting guidelines, and the quality of its risk management and internal audit procedures. Moody's focuses on the strength of the originator's management and staff, technology, disaster recovery, and regulatory and legal compliance.

Going forward, Moody's will conduct a more comprehensive review of each originator and will report to the originator our opinion of its strengths and weaknesses as well as our view on its financial strength and stability. Even greater emphasis will be placed on the originator's track record - in particular, the performance of its loans across different business cycles.

For originator assessments going forward, Moody's is considering loan level credit and compliance reviews. Emphasis will be placed on the procedures utilized to ascertain the willingness and ability of the borrower to repay the loan as well as procedures used to determine property values. The reviews will focus on specific criteria used by the lender to approve mortgage loans, such as borrower income, property appraisal value, debt-to-income ratio and occupancy status.

APPENDIX A - Representations and Warranties

Appraisal Representation and Warranty:

The appraisal representation and warranty should provide that: 1) each mortgage loan in the pool has a written appraisal that was made by an appraiser who was appropriately licensed or certified; 2) the appraiser had and has no relationship, commercial or otherwise, with the borrower, nor any interest, direct or indirect, in the mortgaged property or in any loan made on the property or any loan made to the borrower; 3) the appraiser's compensation or flow of business from the loan originator was not affected by the approval or disapproval of the mortgage loan; 4) the appraisal was written, in form and substance, to either a) Fannie Mae and Freddie Mac standards or b) USPAP standards, and satisfies applicable legal and regulatory requirements; and 5) the appraisal was made and signed prior to the approval of the mortgage loan application.

Income/Employment Representation and Warranty:

For documented income and employment, this representation and warranty should affirm that: 1) the borrower's income and employment has been verified in accordance with the originator's written underwriting guidelines; and 2) to the best of the originator's ability, documentation supporting income and employment have been reviewed for authenticity. For stated income loans, the representation and warranty should affirm that the originator utilized public and/or commercially available information to test for the reasonableness of the stated income and that other attributes of the borrower, including but not limited to assets, disposable income, reserves and credit history, were reviewed by the originator and supported the income used to approve the loan.

Occupancy Representation and Warranty:

The occupancy representation and warranty should be to the effect that the originator has given due consideration to factors, including other real estate owned by the borrower, commuting distance to work and appraiser comments and notes, to determine the occupancy status of the property.

Early Payment Default Representation and Warranty:

This representation and warranty would be intended to address the risk to investors of losses resulting from any mortgage loan that becomes 90 days or more delinquent within the first six months of origination. This representation should also cover that, except for seller or builder concessions, all payments due and payable under the terms of the note and mortgage or deed of trust have been paid solely by the borrower and that no loan payment has been escrowed as part of the loan proceeds on behalf of the borrower.

Data Representation and Warranty:

Going forward, Moody's recommends a significant expansion of the loan information in the mortgage loan schedule that is currently covered by the standard representation and warranty that all information provided in the mortgage loan schedule is materially true and correct. See Appendix B for the suggested mortgage loan schedule field list. Note that this list is not the entire Moody's data request.

Fraud Representation and Warranty:

This representation and warranty should address that no fraud, misrepresentation, material error or omission, or gross negligence with respect to any mortgage loan has taken place on the part of any person in connection with the origination or servicing of the mortgage loan.

Underwriting Representation and Warranty:

The underwriting representation and warranty should be to the effect that each mortgage loan substantially conforms to its originator's underwriting guidelines in effect at the time the loan was underwritten or that any mortgage loan not in substantial conformance to the originator's guidelines has reasonable and documented compensating factors. If possible, the issuer should indicate the percentage of loans in a deal that conform to underwriting standards without exception.

Mortgage Insurance Representation and Warranty:

This representation and warranty should be to the effect that any mortgage loan listed as having mortgage insurance on the mortgage loan schedule has the benefit of a valid, binding and enforceable primary mortgage insurance policy issued by a primary mortgage insurer acceptable to Fannie Mae and Freddie Mac. Additionally, the representation should specify that the form and substance of such policy is in substantial conformance with policies typically acceptable to Fannie Mae and Freddie Mac. Further, any mortgage loan for which the mortgage insurer rejects, denies, or rescinds a claim shall be repurchased by the representation provider from the securitization trust.

Pre-Securitization Independent Third-Party Reviewer Representation and Warranty:

This representation and warranty should provide that: 1) a sample of the loans was reviewed for federal, state and local regulatory compliance, adherence to underwriting guidelines and reasonableness of certain loan level data such as the property value, property occupancy status and borrower income; 2) the third-party reviewer had and has no relationship, commercial or otherwise, with the borrower, nor any interest, direct or indirect, in the mortgaged property or in any loan made on the property or any loan made to the borrower; 3) the third party reviewer had no conflict of interest with any party in connection with the origination of the mortgage loan; 4) the third-party reviewer's compensation or flow of business was not affected by the quantity of adverse findings resulting from the review; and 5) there were no limitations set as to the number of loans reviewed or reported findings.

Anti-Predatory Lending - No Assignee Liability Representation and Warranty:

This representation and warranty should indicate that: 1) all loans in the pool comply with all applicable local, state and/or federal laws and regulations including those pertaining to high cost or other predatory lending statutes; and 2) no actions taken or omissions by or on the part of the originator or any other party during the marketing, negotiation, underwriting, origination, closing, funding or transfer of the loan would result in assignee liability for the Trust.

APPENDIX B - Moody's Proposed Data Request For Initial RMBS Ratings

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
IDENTIFIERS					
1	LoanID	Loan Identifier	E	N	1
2	BorrowerID	Unique Borrower ID - DO NOT USE SSN	E	N	1
3	LoanGroup	Y, H, I, etc. structures	E	N	1
4	SecurityIdentification	Identify Shelf, Year And Issue Number, E.G., Shelf 1997-1	M	N	1
5	DealCutoffDate		M	N	1
PROPERTY INFORMATION					
6	PropertyType	SFD, TH, Condo, Etc.	E	Y	1
7	NumberOfUnits	Number Of Units	M	Y	1
8	Occupancy	Owner Occupied, Second Home, Investment Property	E	Y	1
9	Zip	Property Zip Code	E	Y	1
10	State	Property State	E	Y	1
LOAN TYPE INFORMATION					
11	IncomeVerification	Blank = Not Stated, Not Verified, 0 = Stated, Not Verified, 1 = Stated, Verbally Verified, 2 = Stated And Verified (Complete Fields 12-14)	M	Y	1
12	PayStubs	1 = Most Recent Pay stub Plus 1 Year End Pay stub, 2 = One Year End Pay stub, 3 = One non-Year End Pay stub, 0 = Other	M	Y	1
13	W2	Number Of Years Of W-2's Obtained	M	Y	1
14	TaxReturn	Number Of Years Of Tax Returns Obtained	M	Y	2
15	LenderChosen	Did Lender Chose To Reduce Documentation Needed, Y Or N	M	Y	2
16	4506Used	No, Yes - Not Pulled, Yes - Pulled	M	Y	2
17	EmploymentVerification	Blank = Not Stated, 0 = Not Verified, 1 = Written VOE, 2 = Verbal	M	Y	1
18	AssetVerification	Blank = Not Stated, 0 = Not Verified, Or Enter Number Of Months Of Bank Statements Obtained	M	Y	1
19	MortgageType	C = Conventional, F = FHA, V = VA	M	Y	1
20	ARM	Y Or N	M	Y	1
21	InterestType	S = Simple, A = Amortizing	M	Y	1
22	IsHeloc	Y Or N	E	Y	1
23	OptionArm	Y Or N	E	Y	1
24	LienPosition	1 Or 2 Or 3 Etc.	E	Y	1
25	Modification	Y Or N	M	Y	1
26	ModificationDate	Date Loan Was Modified	M	Y	1
27	Purpose	Cash Out Refi, Rate/Term Refi, Purchase, Home Improvement, Debt Consolidation	E	Y	1
28	EmployeeLoan	Is This Loan To An Employee Of The Originator?	M	N	2

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
29	RelocationLoan	Is The Employer Paying The Relocation Expenses For This Borrower?	M	N	2
30	PiggyBack	Is There A Simultaneous 2nd Lien Originated With This First Mortgage?	M	Y	1
31	Escrow	N = None, T = Taxes, I = Insurance, H = HOA dues, M = MI premium, O = other, Use All That Apply	M	Y	1
32	PredatoryLoanCode	Blank = None, HL = High Cost Local Regulation, HS = High Cost State Regulation, HF = High Cost Federal Regulation	M	Y	1
33	MortgagePayMethod	A = ACH, S = Monthly Statement, C = Coupon, W = Pays Online	N	N	2
CREDIT INFORMATION					
34	FICO	FICO Used To Determine Loan Eligibility And Pricing By Originator	E	Y	1
35	FICOMethod	0 = Single Repository, 1 = Middle Of 3 or Lower Of 2, 2 = Middle Of 3 or Higher Of 2, 3=Highest	M	Y	1
36	FICODate	Date Of FICO Score Provided	M	Y	1
37	BeaconBorr1Equifax score	Credit Score Returned From Equifax For Primary Borrower	E	N	2
38	FICOBorr1Experian	Credit Score Returned From Experian For Primary Borrower	E	N	2
39	EmpiricaBorr1Transunion score	Credit Score Returned From Trans Union For Primary Borrower	E	N	2
40	BeaconBorr2Equifax	Credit Score Returned From Equifax For Co-Borrower	E	N	2
41	FICOBorr2Experian	Credit Score Returned From Experian For Co-Borrower	E	N	2
42	EmpericaBorr2TransUnion	Credit Score Returned From Trans Union For Co-Borrower	E	N	2
43	DeedInLieu	Has The Borrower Ever Avoided Foreclosure With Quit Claim?	N	Y	2
44	PreviousMortgageorRentHistory Grade	A+ Through NG	M	N	2
45	CurrentMortgagePayString	24 month history in form: 000000000, 000010000, where 0 indicates no past due, 1 = 30 days past due, 2 = 60 days past due, and so on	M	Y	1
46	ReportingMethod	OTS Or MBA (O Or M)	M	N	1
47	MonthsFC	Months Since Borrower Out Of Foreclosure	E	N	2
48	MonthsBK	Months Since BK Discharge	E	N	2
49	AmtInCollection	Total Amount Of Collection Accounts	E	N	2
LOAN TERM INFORMATION - ALL LOAN TYPES					
50	StartRate	Initial Note Rate	E	Y	1
51	OriginalLoanAmount	Initial Amount Borrowed	E	Y	1
52	CashOutAmt	For Cash Out Refinance Or 2nd Lien	E	Y	1

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
53	OriginationDate	Note Date	E	Y	1
54	First payment date of loan		M	Y	1
55	OriginalTerm	Term Of Loan In Months	E	Y	1
56	OriginalPI	Original Principal And Interest	M	Y	1
57	OriginalTI	Original Amount Of Tax And Insurance Escrowed	N	Y	1
58	OriginalHOA	Original Amount Of Monthly Homeowner Association Fees	N	Y	1
59	OriginalBPMI	Original Amount Of Monthly MI Payment	N	Y	1
60	OriginalSrLoanBalance	If Pool Is 2nd Liens	E	Y	1
61	OriginalJrLoanBalance	If Pool Is 1st Lien	E	Y	1
62	BalloonDate	Leave Blank If Not Balloon, Enter Date For Balloon	M	Y	1
63	PrepayPenaltyTerm		E	Y	1
64	PrePayPenaltyType		E	Y	1
65	HELOC draw period		M	Y	1
66	IOTerm	Number Of Months Only Interest Is Due From Borrower - Leave Blank If Not IO	E	N	1
LOAN TERM INFORMATION – ARM					
67	Index	Published Rate Used To Calculated New Interest Rate On ARM	E	Y	1
68	GrossMargin	Margin On Note	E	Y	1
69	LCAP	Loan Lifetime Rate Cap – Maximum Amount The Interest Rate My Raise Above The State Rate Over The Life Of The Loan	E	Y	1
70	LFLOOR	Loan Lifetime Rate Floor – Maximum Amount The Interest Rate Can Adjust Downward From The State Rate Over The Life Of The Loan	E	Y	1
71	ICAP	Initial Interest Rate Cap	E	Y	1
72	IFLOOR	Initial Interest Rate Floor	M	Y	1
73	PCAP	Interest Rate Cap Per Adjustment Period After First Adjustment	E	Y	1
74	Pfloor	Interest Rate Floor Per Adjustment Period After First Adjustment	M	Y	1
75	PmtCap	(Formerly AnnualPmtCap = %) Percent Payment Can Raise During Adjustment Period	M	Y	1
76	PmtCapFrequency	Time In Months Payment Cap Is Enforced	M	Y	1
77	PmtFloor	% A Payment Can Decrease During An Adjustment Period	M	Y	1
78	PmtFloorFrequency	Time In Months Payment Floor Is Enforced	M	Y	1
79	NegamLimit	Maximum Percentage Above Original UPB, e.g., 115%, Leave Blank If No Negative Amortization	E	Y	1
80	MinPmtAmt	Option Arm Only	E	Y	1
81	MinPmtPeriod	Option Arm Only	E	Y	1

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
82	OptionsAtRecast	Option Arm Only	E	Y	1
83	MonthOfFirstRateAdjust	(Formerly, MonthOfFirstReset)	E	Y	1
		Number Of Months Until First Rate Reset			
84	ResetPeriodicity	Number Of Months Between Rate Adjustments After First Rate Reset	E	Y	1
BORROWER INFORMATION					
85	SelfEmployed	Y Or N	E	Y	1
86	BorrowerYearsWithEmployer	Borrower Years With Current Employer	N	N	2
87	CoBorrowerYearsWithEmployer	Co-Borrower Years With Current Employer	N	N	2
88	PrimaryBorrowerIncome	Total Income Used To Calculate Debt Ratio For Borrower	N	N	2
89	CoBorrower Income	Total Income Used To Calculate DTI For Co-Borrower	N	N	2
90	OtherBorrowerIncome	Other Income Used To Calculate DTI	N	N	2
91	PrimaryBorrowerDebt	Total Debt Counted In DTI For Borrower	N	N	2
92	CoBorrowerDebt	Total Debt Counted In DTI For Co –Borrower	N	N	2
93	OtherBorrowerDebt	Total Debt Counted In DTI For Other Borrowers	N	N	2
94	TotalNumberOfBorrowers	Number Of Borrowers Executing The Promissory Note	N	N	2
95	HousingToIncomeRatio	P&I, T&I, HOA, Condo Dues Divided By Income	N	Y	2
96	SourceOfDownpayment	List All That Apply: Savings, Gift, Loan, Proceeds From Sale Of Previous Home	N	N	2
97	LiquidAssets	As Shown On Mortgage Application (FN1003)	N	N	2
98	TotalAssets	As Shown On Mortgage Application (FN1003)	N	N	2
99	NetWorth	As Shown On Mortgage Application (FN1003)	N	N	1
100	NumberofDependents	As Shown On Mortgage Application (FN1003)	N	N	2
101	FirstTimeHomebuyer	Y Or N	E	Y	1
102	Other Real Estate 1 State	As Shown On Mortgage Application (FN1003)	N	N	2
103	Other Real Estate 1 Zip	As Shown On Mortgage Application (FN1003)	N	N	2
104	Other Real Estate 1 Status	As Shown On Mortgage Application (FN1003)	N	N	2
105	Other Real Estate 2 State	As Shown On Mortgage Application (FN1003)	N	N	2
106	Other Real Estate 2 Zip	As Shown On Mortgage Application (FN1003)	N	N	2
107	Other Real Estate 2 Status	As Shown On Mortgage Application (FN1003)	N	N	2
108	Other Real Estate 3 State	As Shown On Mortgage Application (FN1003)	N	N	2
109	Other Real Estate 3 Zip	As Shown On Mortgage Application (FN1003)	N	N	2
110	Other Real Estate 3 Status	As Shown On Mortgage Application (FN1003)	N	N	2
111	Other Real Estate 4 State	As Shown On Mortgage Application (FN1003)	N	N	2
112	Other Real Estate 4 Zip	As Shown On Mortgage Application (FN1003)	N	N	2
113	Other Real Estate 4 Status	As Shown On Mortgage Application (FN1003)	N	N	2
114	NumberPropertiesOwned	Encumbered Or Unencumbered	N	Y	1
115	TotalDebt	Total Monthly Debt Used To Calc DTI	N	Y	1
116	TotalIncome	Total Monthly Income Used To Calc DTI	N	Y	1

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
117	OtherIncome	Total Other Income Used To Calculate DTI	N	N	2
118	NetRentalIncome	From Mortgage Application (FN1003)	N	N	2
119	DividendsInterest	From Mortgage Application (FN1003)	N	N	2
120	Commission Income	From Mortgage Application (FN1003)	N	N	2
121	Self Employed Income	From Mortgage Application (FN1003)	N	N	2
122	Wage Income	From Mortgage Application (FN1003)	N	N	2
123	YrsInHome	Refinance Loans Only	N	Y	2
124	YrsInIndustry	Number Of Years Borrower Has Been In Industry (From Mortgage Application (FN1003)	N	N	2
BORROWER QUALIFICATION INFORMATION					
125	DownpaymentAmount	From Mortgage Application (FN1003)	N	Y	2
126	TotalClosingCosts	From HUD I	N	Y	2
127	ClosingCostsFinanced	From HUD I	N	Y	2
128	TotalOriginationAndDiscount Points	From HUD I	N	Y	2
129	OriginationAndDiscount Points Financed	From HUD I	N	Y	2
130	FullyIndexPmt	Payment That Would Result By Using Gross Margin Plus Index	E	Y	1
131	BorrQualPmtType	1 = Start Rate, 2 = First Year Cap Rate, 3 = I/O Amount, 4 = Fully Indexed, Minimum Monthly	M	Y	1
132	BorrQualPmtRate	Rate Used To Qualify Borrower For The Loan	E	Y	1
133	FullyIndexedRate	Index Plus Gross Margin At Time Of Origination	E	Y	2
134	DebtToIncomeRatio	Debt Divided By Income Expressed As A %	E	Y	1
135	CashReserves	Do Not Use Cash Out Proceeds, Liquid Assets After Closing	E	Y	1
136	DisposableIncome		E	N	1
137	ExceptionLoan	Exception Loan Yes Or No	M	Y	1
138	JrMortgageType	For 1st Mortgages With Junior Liens - Use Current Mortgage Type Descriptions	N	Y	2
139	SrMortgageType	For 2nd Lien Pools - Use Current Mortgage Type Descriptions	M	Y	1
COLLATERAL INFORMATION					
140	OriginalAppraisalAmount		E	Y	1
141	OriginalPropertyValuationDate	Date Of Original Appraisal Or Other Valuation	N	Y	1
142	OriginalPropertyValuation Method	URAR 1004, 2055 Ext, 2055 Int, 2070, 2075, AVM, 2 URAR, Etc.	M	Y	1
143	AVMModelName		N	N	2
144	AVMConfidenceRange		N	Y	1
145	MostRecentValuationAmount	For Loans Over 6 Months Seasoned	M	Y	1
146	MostRecentPropValueDate	For Loans Over 6 Months Seasoned	M	Y	1
147	MostRecentPropValuationMethod	URAR 1004, 2055 Ext, 2055 Int, 2070, 2075, AVM, 2 URAR	M	Y	1

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
148	SalePrice	For Purchase Money Loans Only	M	Y	1
149	LTV	Original 1st Lien Loan Amount Divided By The Lesser Off The Original Appraised Amount Or Sale Price	E	Y	1
150	JrLTV	Original 2nd Lien Loan Amount Divided By The Lesser Off The Original Appraised Amount Or Sale Price	E	Y	1
151	CLTV	Original 1st And 2nd Lien Loan Amounts Divided By The Lesser Of The Original Appraised Amount Or Sale Price	E	Y	1
CURRENT INFORMATION					
152	CurrentLoanBalance		E	Y	1
153	CurrentRate		E	Y	1
154	CurrentPI		M	Y	1
155	CurrentTI		N	Y	1
156	CurrentHOA		N	Y	1
157	CurrentMonthlyBPMI		N	Y	1
158	CurrentSrBalance	UPB of Senior Lien	E	Y	1
159	CurrentJrBalance	UPB of Junior Lien	E	Y	1
160	PaidThroughDateAsOf	Date, The Paid Thru Date Is Reported As Of	E	Y	1
161	PaidThroughDate		E	Y	1
162	CurrentFico	Most Recent Updated Credit Score	M	Y	1
163	CurrentFicoMethod	0 = Single Repository, 1 = Middle Of 3 or Lower Of 2, 2 = Middle Of 3 or Higher Of 2, 3 = Highest	M	Y	1
164	CurrentFicoDate	Date Of Current Fico Provided	N	Y	1
3RD PARTY INFORMATION					
165	MIPProvider	Name Of MI Provider	E	Y	1
166	MICoverage	Formerly Called "Insurance" And Used For BPMI Only = % Of MI Coverage	M	Y	1
167	MIType	BPMI Or LPMI	M	Y	1
168	PrimaryServicer		E	N	1
169	ServicingAdvanceMethod	P = Principal Only, I = Interest Only, B = Both Principal And Interest, N = None	M	N	1
170	MasterServicer		E	N	1
171	BrokerApp	Y Or N = Y, If Broker Took Application.	M	Y	1
172	Mortgage Broker Name		N	N	2
173	Mortgage Broker License No.		N	N	2
174	Originator	Name Of Lender	E	Y	1
175	Channel	Wholesale, Bulk Correspondent, Flow Correspondent, Retail	M	Y	1
176	Appraiser		N	N	2
177	AppraiserLicenseNumber		N	N	2
178	RealEstateBrokerName		N	N	2

FIELD COUNT	FIELD NAME	DEFINITION	NEW - MODIFIED- EXISTING	REP & WARRANTY ITEM	DATA LEVEL
179	RealEstateAgentName		N	N	2
180	LoanOfficerName	For Other Than Broker - Name Of Person That Took The Application	N	N	2
3RD PARTY PRE-SECURITIZATION REVIEW INFORMATION					
181	DDFirm	Name Of 3rd Party Pre-Securitization Firm	N	Y	1
182	DDOverallScore	3rd Party Reviewer Score	N	Y	1
183	DDComplianceScore	3rd Party Reviewer Compliance Score	N	Y	1
184	DDCreditScore	3rd Party Reviewer Credit Score	N	Y	1
185	DDExceptionCode	Enter All That Apply A = LTV, B = CLTV, C = FICO, D = DTI. E = Loan Amount, F = Cashout Amount, G = Cash Reserves, O=Other	N	Y	1
186	DDCompFactorCode	Enter All That Apply A = Year In Home, B = Cash Reserves, 3 = Credit Scores, O = Other	N	Y	1
187	DDAuditedIncome	Income 3rd Party Reviewer Determined	N	Y	1
188	DDAuditedOccupancy	Occupancy Status 3rd Party Reviewer Determined	N	Y	1
189	DDAuditedCollateral Value	Property Value 3rd Party Reviewer Determined	N	Y	1
190	DDAuditedDTI	DTI As Calculated By 3rd Party Reviewer	N	Y	1
191	FraudSoftwareName		N	N	2
192	FraudSoftwareScore		N	N	2

APPENDIX C - Moody's Proposed MONTHLY PERFORMANCE DATA

FIELD COUNT	PROPOSED MONTHLY PERFORMANCE DATA FIELDS (REPORTABLE 1ST DAY OF EACH MONTH FOR PRIOR MONTH)	DESCRIPTION
IDENTIFIERS		
1	Loan ID	Same Id Used For Moody's Initial Deal Rating
2	Borrower ID	Same Id Used For Moody's Initial Deal Rating
3	Loan Group	Same Id Used For Moody's Initial Deal Rating
4	Security Identification (Trust Name)	Same Id Used For Moody's Initial Deal Rating
CURRENT REMITTANCE INFORMATION		
5	Remittance Report Cutoff Date	
6	Period Beginning Balance	Ending Balance From Prior Month's Report
7	Actual Outstanding Balance	Outstanding Principal Balance As Of The Monthly Cutoff Date
8	Scheduled Ending Balance	Scheduled Principal Balance As Of The Monthly Cutoff Date
9	Remaining Term	
10	Last Paid Date	
11	Next Due Date	
12	Current Note Rate	
13	P&I Amount	
14	Scheduled Interest Due	
15	Actual Interest Paid	
16	Negative Amortization Amount	
17	Scheduled Principal	
18	Actual Principal	
19	Monthly Tax Escrow	
20	Monthly Insurance Escrow	
21	Monthly HOA Escrow	
22	Monthly Flood Insurance	
23	Monthly MI Amount	
24	Monthly "Other" Escrow Lines	
25	Next Rate Amount	
26	Next Payment Change Date	
27	Current Index Value	For Arms, If Within Look Back Period For Index
28	Zero Balance Effective Date	
29	Zero Balance Code*	
30	Repurchase Reason Code****	
31	Prepayment Penalty Due	
32	Prepayment Penalty Paid Amount	
33	Prepayment Penalty Waived Amount	
PERFORMANCE DATA		
34	Delinquency Status (30+, 60+, 90+, FC, BK, REO)	
35	First Unpaid Installment Date	
36	Non-Pay Reason Code**	
37	24 Month Pay String	Last 24 Months, 0=No Delinquency, 1= 30 Day, 2, 60 Day, 3=90 Day, 4=120+
38	Updated FICO	
39	Updated Fico Date	

FIELD COUNT	PROPOSED MONTHLY PERFORMANCE DATA FIELDS (REPORTABLE 1ST DAY OF EACH MONTH FOR PRIOR MONTH)	DESCRIPTION
40	Updated Fico Bureau	1=Experian, 2-Transunion 3-Equifax 4 -Other
41	Updated Property Value	
42	Updated Property Type (AVM, BPO, Etc)	
43	Updated Property Value Date	
44	Property Occupied (Y/N)	
45	Total Amount Past Due (PI, TI, Other)	
46	Under Forbearance Plan	Y/N
47	Delinquent Under Forbearance Plan	Y/N
48	Bankruptcy Chapter	
49	Bankruptcy Start Date	
50	Bankruptcy End Date	
51	Deed-In-Lieu Date	Title Transferred To Servicer Date
52	Foreclosure Referral Date	
53	Foreclosure Sale Date	
54	Foreclosure Delay Code ***	
55	Foreclosure Bid/Sale Price	
56	Reo Date	
57	Reo List Price	
58	Reo Sale Date	
59	Reo Proceeds	
60	Total Expense (Advancing, Marketing, All Other)	
61	REO Net Proceeds/Loss	
62	MI Claim Filed Date	
63	MI Claim Amount	
64	Mi Paid Date	
65	MI Claim Paid Amount	
66	MI Claim Denied/Rescinded Date	
67	Marketable Title Transferred To MI Date	
68	Total Loss Amount Passed To Trust (Officer's Cert)	
69	Recovery Amount	\$ Amount Of Recovery
70	Recovery Days	Number Of Days Between Liquidation And Recovery Receipt
INVESTOR REPORTING		
71	Servicer ID	
72	Reporting Style - MBS Or OTS	
73	Master Servicer Id	
74	Special Servicer Id	
75	Servicing Fee	
76	Master Servicing Fee	
77	Special Servicer Fee	
78	Trustee Fee	
79	Pool Insurance Fee	
80	Special Hazard Fee	
81	Guarantor Fee	
82	Other Fee	

FIELD COUNT	PROPOSED MONTHLY PERFORMANCE DATA FIELDS (REPORTABLE 1ST DAY OF EACH MONTH FOR PRIOR MONTH)	DESCRIPTION
LOAN MODIFICATION		
83	Modification Effective Payment Date	Modification Date
84	Modification Loan Balance	Beginning Actual Unpaid Principal Balance Owed By The Borrower As Of The Modification Date
85	Total Capitalized Amount	Total Amount Owing Under The Loan And Added To The Ending Actual Balance
86	Pre-Modification Interest (Note) Rate	Interest Rate Of The Loan Immediately Preceding The Modification Effective Payment Date
87	Post-Modification Interest (Note) Rate	Interest Rate Of The Loan As Of The Modification Effective Payment Date
88	Post-Modification Margin	Margin As Of The Modification Effective Payment Date
89	Post-Modification Periodic Interest Caps	Maximum Interest Rate Which Can Be Charged In An Adjustment Period, As Of The Modification Effective Payment Date
90	Post-Modification Lifetime Interest Caps	Maximum Interest Rate Which Can Be Charged Over The Life Of The Loan, As Of The Modification Effective Payment Date
91	Pre-Modification P&I Payment	Total Principal And Interest Payment Amount Preceding The Modification Effective Payment Date
92	Post-Modification P&I Payment	Total Principal And Interest Payment Amount As Of The Modification Effective Payment Date
93	Pre-Modification Maturity Date	Original Maturity Date Of The Loan (If There Is More Than One Modification Over The Life Of The Loan, Subsequent "Pre-Modification Maturity Date" Would Reflect The Value Immediately Preceding The Most Recent Modification Effective Payment Date Reported)
94	Post-Modification Maturity Date	Maturity Date Of The Loan As Of The Modification Effective Payment Date
95	Pre-Modification Interest Reset Period (If Changed)	Original Duration Of The Interest Reset Period Of The Loan
96	Post-Modification Interest Reset Period (If Changed)	Duration Of The Interest Reset Period Of The Loan As Of The Modification Effective Payment Date
97	Pre-Modification Initial Reset Date*	First Interest Reset Date Under The Original Terms Of The Loan
98	Post-Modification Initial Reset Date And Next Reset Date	Initial Interest Reset Date As Of The Modification Effective Payment Date, And The Subsequent Reset Date
99	Fixed To ARM (Y/N)	Change In Loan Status From Fixed Rate To ARM
100	ARM To Fixed (Y/N)	Change In Loan Status From ARM To Fixed Rate
101	IO To Fully Amortizing (Y/N)	Change In Loan Status From IO To Fully Amortizing
102	Fully Amortizing To IO (Y/N)	Change In Loan Status From Fully Amortizing To IO
103	Pre-Modification Io Term	Term Of Io Preceding The Modification Effective Payment Date
104	Post-Modification Io Term	
105	Balloon Payment Amount	Term Of Io As Of The Modification Effective Payment Date
106	Balloon Payment Date	Cumulative Amount Of Balloon Principal Payment Due
107	Forgiven Principal Amount	Amounts Owing And Payable Of Principal Forgiven
108	Forgiven Interest Amount	Gross Amount Of Interest Forgiven

CODE KEYS	
*	Zero Balance Codes
	01 Pre paid
	02 matured
	03 3rd party sale
	04 short sale/ short payoff
	05 deed-in-lieu
	06 Note sale
	07 repurchased
	08 charge off
	09 REO sale
**	Non-Pay Reason Codes
	01 Death of Borrower
	02 illness
	03 marital issues
	04 unemployment
	05 business failure
	06 temporary curtailment of income
	07 bankruptcy
	08 over obligated (excessive credit use)
	09 Casualty Loss
	10 moved/vacated
	11 dissatisfied with property
	12 energy/environmental costs
	13 servicing problem
	14 auto repairs
	15 other
***	Foreclosure Delay Code
	01 no delay
	02 BK delay
	03 title delay
	04 contestation delay
	05 court delay
****	Repurchase Reason Code
	01 breach of rep/warrants
	02 EPD
	03 Delinquent
	04 fraud
	05 other - describe

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