2008

ANALYSIS OF SUBPRIME MORTGAGE SERVICING PERFORMANCE

DATA REPORT NO. 2
APRIL 2008

STATE FORECLOSURE PREVENTION WORKING GROUP

Executive Summary

In February 2008, the State Foreclosure Prevention Working Group published its first data report on performance of subprime mortgage servicing, based on data from October 2007 provided by 13 of the 20 largest subprime mortgage servicers. The State Foreclosure Prevention Working Group, composed of state attorneys general and state banking regulators, published this data to provide the public with information to shed light on how servicers are managing the unprecedented level of homeowners struggling to make their mortgage payments.

The first report found that, while servicers had increased their use of loan modifications, a large percentage of seriously delinquent loans (7 out of 10) were not in any sort of work-out process. The first report also revealed that a significant proportion of adjustable rate subprime loans were entering into delinquency prior to the first reset date, reflecting the extent of weak underwriting and mortgage origination fraud present in subprime loans in recent years.

This second report provides information on servicing performance from October 2007 through and including January 2008. The additional data allow us to assess performance trends, in addition to providing a static snapshot of recent performance.

Based on our analysis, the collective efforts of servicers and government officials to date have not translated into meaningful improvement in foreclosure prevention outcomes. In major respects, the subprime servicing data for January 2008 is nearly *unchanged* from October 2007. In normal times, one would not expect a significant change in a four-month period; however, this time period involved a dramatic increase in public attention to the subprime mortgage crisis, a ramping up of efforts by the HOPE NOW Alliance, and the initiation of new creative outreach efforts by servicers and government officials.

Specific Findings:

1. **Seven out of ten seriously delinquent borrowers are *still* not on track for any loss mitigation outcome.** While the number of borrowers in loss mitigation has increased, it has been matched by an increasing level of delinquent loans. The number of home retention solutions (forbearance, repayment plan, and modification) in process, as compared to the number of seriously-delinquent loans, is unchanged during the four month period. The absolute numbers of loss mitigation efforts and delinquent loans have increased, but the relative percentage between the two has remained the same. Given creative servicer outreach efforts and increased public awareness of the HOPE Hotline during this time period, this large gap suggests a more systemic failure of servicer capacity to work out loans.

2. **Data suggests that loss mitigation departments are severely strained in managing current workload.** For example:

    a. Almost two-thirds of all loss mitigations efforts started are not completed in the following month**.** Most loss mitigation efforts do not close quickly. This consistent trend over the last three months suggests that many proposed loss mitigations fail to close, rather than simply take longer than a month to work through the system. Based on anecdotal reports of lost paperwork and busy call centers, we are concerned that servicers overall are not able to manage the sheer numbers of delinquent loans.

    b. Seriously delinquent loans are "stacking up" on the way to foreclosure. The primary increases in subprime delinquency rates are occurring in very seriously delinquent loans or in loans starting foreclosure. This suggests that the burgeoning numbers of delinquent loans that do not receive loss mitigation attention are clogging up the system on their way to foreclosure. We fear this will translate to increased levels of vacant foreclosed homes that will further depress property values and increase burdens on government services.

3. **For those homeowners receiving loss mitigation assistance, more are receiving loan modifications**. Two-thirds of home retention solutions started in January were directed to loan modification, showing a continued shift to longer-term solutions for homeowners that receive loss mitigation assistance. Many servicers are replacing their use of repayment plans in favor of loan modifications.

New approaches are needed to prevent millions of unnecessary foreclosures. Without a substantial increase in loss mitigation staffing and resources, we do not believe that outreach and unsupervised case-by-case loan work-outs, as used by servicers now, will prevent a significant number of unnecessary foreclosures. In our first report, we renewed our call for more systematic, long-term solutions to efficiently deal with subprime loans originated in recent years. While we support industry-led efforts to implement broader-based programs such as the ASF "fast track" program and Project Lifeline's 30-day breathing period, we still see a tremendous gap between the need for loan work-outs and the options in place today.

The State Working Group believes more robust approaches to avoid preventable foreclosures are necessary. Servicers, investors, and state officials have opportunities to work together on the following:

- Developing a more systematic loan work-out system to replace the intensive "hands-on" loss mitigation approach. The continued reliance on intensive individual interaction to identify alternatives to foreclosure misses out on opportunities to implement solutions that can reach more homeowners facing foreclosure. A more systematic approach would benefit homeowners and investors by reaching more people with more streamlined solutions. Such an approach would build on the initial effort of the ASF Framework, but cover many more loans.
- Slowing down the foreclosure process to allow for more work-outs. Many states have passed or are considering legislation to slow down the foreclosure process and to increase notice to delinquent homeowners. Targeted efforts to slow down subprime foreclosures may give homeowners and servicers more time to find solutions to avoid foreclosure.

In addition to these efforts, the State Working Group recognizes that federal officials have proposed or are considering legislation, such as permitting judicial modification of loans in bankruptcy and expanding FHA refinancing of subprime loans, that would mark a significant change to the current mortgage servicing dynamics. While we do not endorse any specific federal approach, we support the development of innovative approaches that recognize the extent and scale of the foreclosure crisis.

Updates and Trends between October 2007 and January 2008

Our first report,[1] issued in February 2008, included an extensive discussion of the purposes and formation of the State Foreclosure Prevention Working Group, the development of our "call report" format to collect data from subprime mortgage servicers, and the participation of 13 of the largest 20 subprime servicers.

We also provided a detailed discussion of the first monthly submission of servicing data covering the month of October 2007. This second report will highlight trends between the October 2007 data and the subsequent three months through and including January 2008. As with our first report, we have included as Appendix A the consolidated state report data for the most recent month (in this case, January 31, 2008). We have also included (as Appendix B) a trend analysis to cover each month between October 2007 and January 2008.

A. Summary of Servicing Activity

The composition of the Reporting Servicers did not change from the first report. We continue to have data from 13 of the largest subprime servicers, accounting for approximately 57% of the subprime servicing market. After the first report, several servicers revised data to improve the accuracy of their reporting and understanding of data definitions. With one exception, discussed in Section B below, these revisions did not create a material change from the initial data included in our first report.

Payment Resets

In our first report, we highlighted the high level of delinquency for adjustable rate subprime loans *before* any "reset" of their interest rate to a higher level. The most recent data identifies a worsening of this trend, as more subprime loans are delinquent prior to any payment change. For instance, the percentage of loans facing reset in the 3rd Quarter of 2009 that are currently delinquent jumped from 21.4% to 28.5%. While delinquency rates increase during the early life of a loan pool, this worsening trend confirms our initial assessment that very weak underwriting and mortgage origination fraud, and not simply payment resets, has been the primary cause for elevated subprime loan delinquencies for loans originated through at least the middle of 2007.

While rate resets have a potential to create payment shock, recent cuts in interest rates have somewhat reduced the potential impact of payment shock to accelerate the rate of delinquency and foreclosure.[2] As our first report found, only about 3% of currently delinquent loans entered delinquency as a direct result of an initial payment reset.

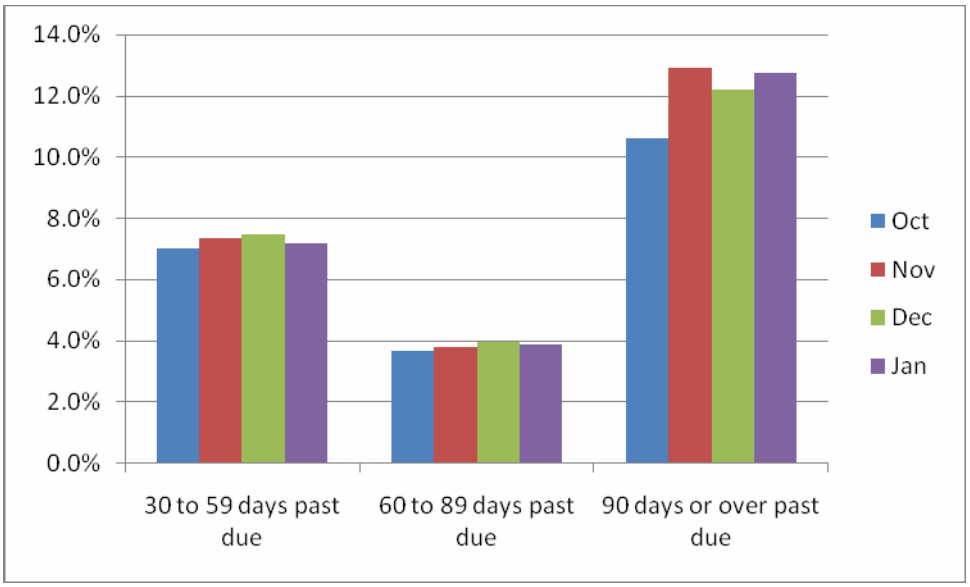
[1] *Analysis of Subprime Mortgage Servicing Performance, Data Report No. 1*, State Foreclosure Prevention Working Group (Feb. 7, 2008), available at http://www.csbs.org/Content/NavigationMenu/Home/StateForeclosurePreventionWorkGroupDataReport.pdf.

[2] *See Fed's Interest Rate Cuts Limit Subprime ARM Reset 'Shock'*, Inside B&C Lending, March 28, 2008 at 6 (referring to S&P report on impact of interest rate cuts on subprime adjustable rate mortgages).

Delinquency and Default

At the end of January 2008, nearly a quarter of subprime and Alt-A loans were reported delinquent. The servicers reported more than 630,000 subprime and Alt-A loans delinquent by 90 days or more. As shown in Figure 1 below, the delinquency rate for 30-day and 60-day delinquencies remained relatively constant, while the 90-day delinquency rate increased by 16%. This conveys that servicers are pushing the 30-day delinquent files to the next category, then the 60-day delinquent files to the 90 days or over category. Unfortunately, this lack of loan delinquency resolution at the first signs of problems for the borrower is only leading to a pile-up of seriously-delinquent files and ultimately, foreclosure.

Figure 1. Subprime and Alt-A Delinquency Rates



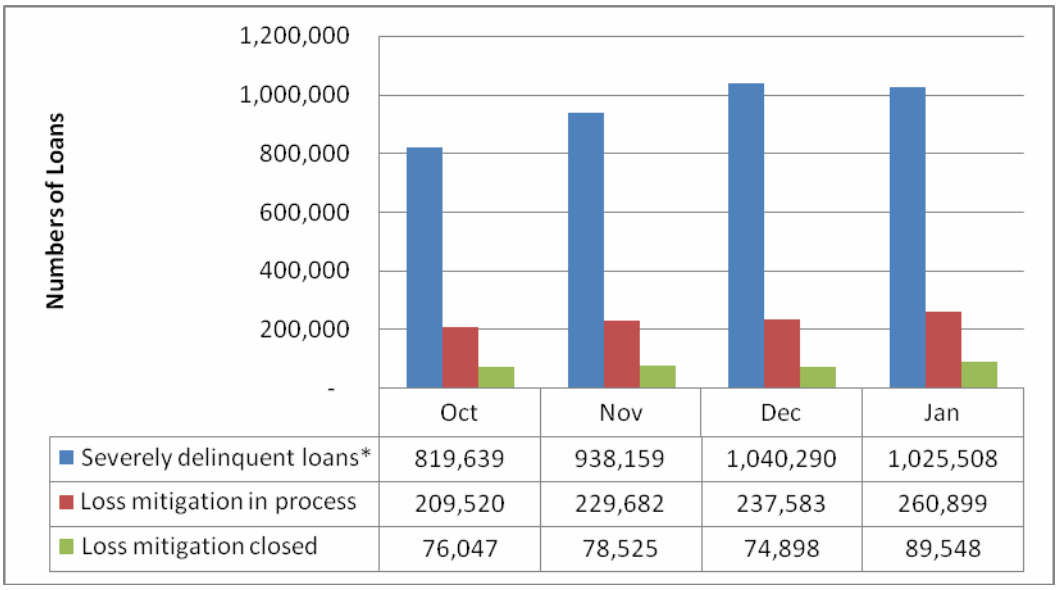
Nearly 300,000 loans are currently in some stage of foreclosure, up 8% between October and January. Furthermore, 133,000 foreclosures were completed in January, a 30% increase from October 2007. In our initial report, we expressed concern about a build-up of foreclosed home inventory on local home prices. We reiterate that concern based on the trends in foreclosures and increases in loans 90 days or more past due.

Finally, although not the focus of our efforts, we note with concern the increasing level of prime delinquencies in our data, and in other publicly available data. Weakness in prime loan quality will further strain the capacity of the larger servicers that manage both prime and subprime servicing portfolios.

B. Loss Mitigation and Loan Modification Efforts

The most troubling finding from our first report was the sheer number of seriously delinquent borrowers -- 7 out of 10 borrowers – that were not in any loss mitigation process to work out their situation. This finding has remained consistent over the subsequent three months of data.

Figure 2. Comparison between seriously delinquent (60+) loans and loss mitigation in process



	Oct	Nov	Dec	Jan
Severely delinquent loans*	819,639	938,159	1,040,290	1,025,508
Loss mitigation in process	209,520	229,682	237,583	260,899
Loss mitigation closed	76,047	78,525	74,898	89,548

* Severely delinquent loan total adjusted downward to account for two servicers not reporting loss mitigations in process.

The data through January confirms the finding from our first report that servicers have increased their use of loan modifications as a tool to enable homeowners to avoid foreclosure. While loan modifications in process increased 56% between October and January, repayment plans in process decreased 17% over the same time period, but overall, the percentage of "home retention" efforts in process remained unchanged (20% of seriously delinquent loans) between October 2007 and January 2008. Thus, servicers appear to be replacing short-term repayment plans with longer-term loan modifications.

In our first report, we divided loss mitigation efforts into three broad categories: 1) those where borrower loses the home (short sale and deed in lieu); 2) those where borrower retains the home (forbearance, repayment plan, or modification); and 3) those where borrower efforts lead to resolving the delinquency (refinance or reinstatement). The trend data, as seen in Table 1 below, show no change in the relative proportions of these efforts over this four-month period.

Table 1. Loss mitigation efforts, as a percent of total loans 60 or more days delinquent

Loss Mitigation Efforts	Jan 2008	Oct 2007
Total in process with borrower losing home	3.42%	3.42%
Total in process of home retention	20.06%	20.17%
Total in process of being resolved by borrower	1.95%	1.97%
Total loans in loss mitigation	25.44%	25.56%

In short, while more loans are in loss mitigation and more are working toward loan modifications, the level and dispersion of loss mitigation efforts in January is nearly identical to that of October 2007.

Closed Loss Mitigations

As noted above, after the publication of our first report, various servicers revised their data to improve consistency of the reporting or to correct for errors in initial reporting. As a result, the number of closed modifications due to reinstatement was dramatically reduced. While our first report highlighted the disparity between the "in process" and "closed" categories, the revised data in Table 2 show a much smaller gap between the two categories.

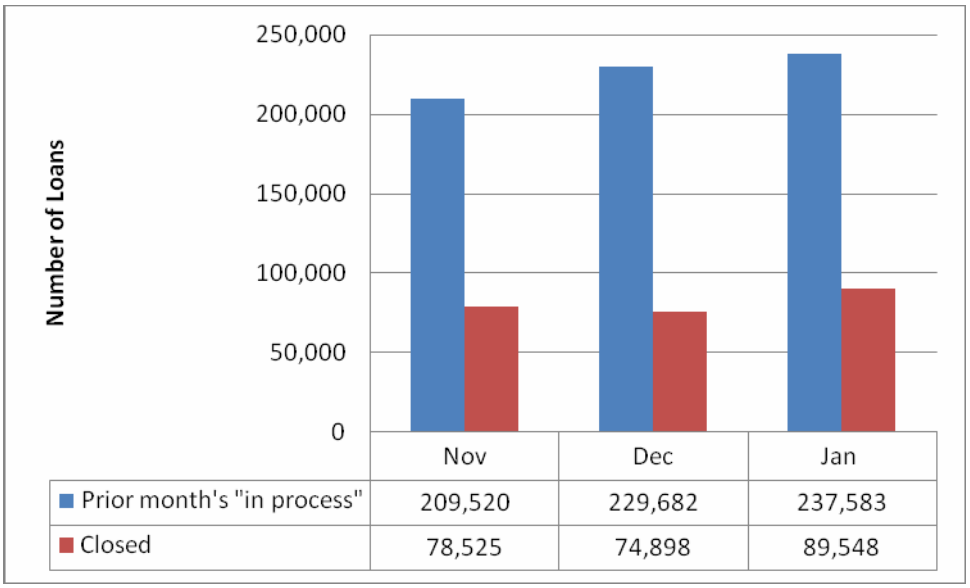
Table 2. Loss mitigation efforts in process versus loss mitigation efforts closed for month of January 2008.

Loss Mitigation Effort	In Process	Closed
Deed in lieu	1.4%	0.4%
Short sale	12.1%	4.4%
Forbearance	6.5%	3.9%
Repayment plan	19.0%	26.9%
Modification	53.4%	27.1%
Refinance or paid in full	2.0%	12.9%
Reinstatement	5.7%	24.4%
Total	100.0%	100.0%

While not as stark as our first report, the data still shows that a quarter of loss mitigation cases are closed due to borrowers catching up on past payments.

One explanation for the proportional differences between "in process" and "closed" modifications is the numbers of loss mitigations in process that fail to close. Through January 2008, closed loss mitigation efforts accounted for less than 40% of loss mitigations in process in the prior month. See Figure 3.

Figure 3. Comparison between loss mitigations closed and prior month's loss mitigations in process.



This rate of fall-out is a significant concern. Loss mitigation proposals do not close for a variety of reasons; one reason is the level of paperwork required to close a loan modification. Servicers have told us that borrowers simply do not return the required documentation to complete the modification, and borrowers and counselors have reported that servicers lose paperwork they have sent in to the servicer. Regardless of where the problem arises, it appears that the level of paperwork required is a barrier to preventing unnecessary foreclosures.

Types of Loan Modifications

We are still working toward better reporting on types and duration of loan modifications, but we are able to make some general observations. First, we see a fairly even split between loan modifications that are permanent, life-of-loan changes and modifications that have a shorter duration. Freezing the interest rate at the starter/initial rate on an adjustable rate loan is the most common loan modification. There are significant numbers of interest rate modifications that fall below the starter/initial rate and a larger number that are above the starter rate (but below the reset rate). The majority of servicers are not reporting significant levels of modifications that reduce principal alone, although principal reductions may be combined with other modifications and therefore may not evidenced in our reporting.

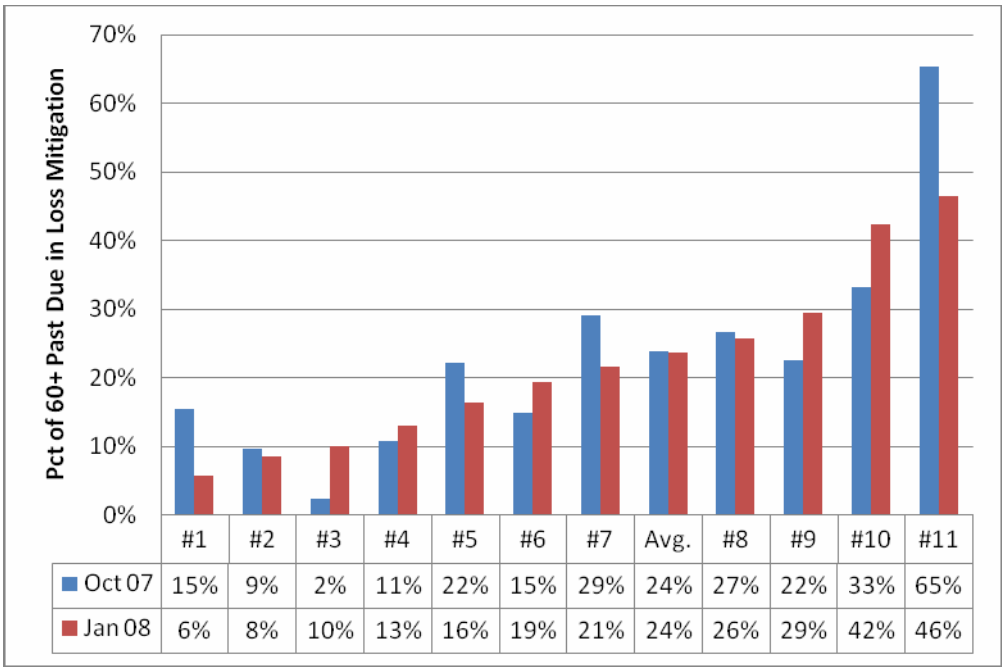
C. Variations Among Servicers

As noted in the first report, subprime servicing is not a monolith. Servicers differ as to their size, their level of specialization in subprime servicing, and their affiliations with mortgage originators. Our report found a significant variation among servicers in the types of modifications offered and the percentage of seriously delinquent borrowers in loss mitigation.

In January 2008, loan modifications were the most used loss mitigation technique for five of the 13 Reporting Servicers, closely followed by repayment plans by 4 of the 13 and reinstatement by 3 of the 13. This shows a slight shift toward loan modifications from the former use of repayment plans.

The data continue to show a wide disparity among levels of loss mitigations in process (Figure 4 below); however, there has been some compression of the disparity. Higher-performing servicers from October have some deterioration in their metrics and other servicers have raised their level of loss mitigation.

Figure 4: Loss mitigations in process for 11 Reporting Servicers in October 2007 versus January 2008, as a percentage of 60+ days past due



	#1	#2	#3	#4	#5	#6	#7	Avg.	#8	#9	#10	#11
Oct 07	15%	9%	2%	11%	22%	15%	29%	24%	27%	22%	33%	65%
Jan 08	6%	8%	10%	13%	16%	19%	21%	24%	26%	29%	42%	46%

Trends in Key Metrics Among Individual Servicers

With individual company data over this four month period, the State Working Group can begin to identify trends occurring at individual servicers.

Six of 11 servicers reporting loss mitigations in process saw a decline in seriously delinquent loans in loss mitigation between October 2007 and January 2008, with most of these being double-digit declines. At the same time, five servicers had impressive increases in their rates of loss mitigation. We have encouraged servicers to increase their loss mitigation capacity and it appears that some have made strides forward.

While almost every servicer saw an increase in subprime and Alt-A loans 90 or more days delinquent, the ones that had the largest increases in delinquency rates tended to show the biggest deterioration of borrower contact over this period.

Ten of the 11 servicers reporting loss mitigations in process showed increases in their use of loan modifications. Some of these increases were dramatic, with five servicers demonstrating increases of over 100% in loan modifications over the four month period.

Conclusion

Between October 2007 and January 2008, the mortgage industry established the HOPE NOW Alliance and devoted significant effort to increase public awareness of the resources to prevent foreclosures, to reach borrowers that had been difficult to reach, and to develop new approaches to modify loans more quickly. In addition, the HOPE NOW Alliance has developed a series of data collection projects that we hope will improve the ability to analyze servicer performance.

As of the end of January, these efforts have not yet made a major difference in preventing unnecessary foreclosures. The vast majority of homeowners with seriously delinquent loans are not on track for a loan work-out of any type. These loans are moving through the system toward foreclosure, leaving investors with increasing inventories of foreclosed homes. Servicers are increasing their use of loan modifications, but this increase is matched by increases in delinquency. Initial efforts to develop systemic approaches are far too limited to make a difference in preventable foreclosures.

In our previous report, we discussed the refusal of some national banks to provide servicing data, with two citing the advice of the Office of the Comptroller of the Currency (OCC). We called on the OCC to encourage national bank servicers to work voluntarily with the states in this foreclosure crisis. On February 29, 2008, the Comptroller announced that some of the largest national banks will be providing mortgage servicing data to the OCC on a monthly basis. We encourage the OCC to aggregate and publish data collected from national banks to complement the State Working Group's efforts.

The State Working Group will continue to work with servicers to promote systematic solutions to modify loans in a more streamlined and efficient manner. Without a systematic approach, we see little likelihood that ongoing efforts will make a serious dent in the level of unnecessary foreclosures.

APPENDIX A

CONSOLIDATED STATE REPORT FOR MORTGAGE SERVICERS
DATA AS OF JANUARY 31, 2008

Consolidated State Report for Mortgage Servicers

Consolidated Report as of January 31, 2008 for 13 Companies

All dollar amounts are the unpaid principal balance (UPB) and are in thousands (000's).
All numbers of loans are the actual number.

OPERATIONAL PROFILE	Number	%	UPB	%
Total Loans Serviced	15,470,743	100.00%	2,426,570,587	100.00%
Serviced loans originated and funded by an unaffiliated party	8,407,090	54.34%	1,369,435,887	56.44%
Serviced loans where originator or funder is affiliated with the servicer	7,063,653	45.66%	1,057,134,700	43.56%
Serviced loans secured by owner-occupied residence*	12,949,454	83.70%	2,080,500,681	85.74%
Serviced loans for investment or second residence property*	2,520,653	16.29%	344,452,211	14.20%
Loans which are secured by a first mortgage only*	11,390,558	73.63%	2,110,826,723	86.99%
Loans which are secured by a second mortgage only*	1,459,966	9.44%	75,538,990	3.11%
Loans which you service both the first and second mortgage*	2,706,156	17.49%	260,177,860	10.72%
*Reported data reconciles within 2%.				
Prime Loans (8 servicers reporting)	10,266,475	100.00%	1,674,789,279	100.00%
Fixed rate, fully amortizing	7,288,708	71.00%	1,032,976,592	61.68%
Hybrid ARMs (2/28, 3/27s, or similar)	1,237,967	12.06%	324,340,123	19.37%
Adjustable rate, fully amortizing	919,100	8.95%	45,831,400	2.74%
Loans with interest only feature	435,318	4.24%	126,633,983	7.56%
Payment Option ARMs and other loans with negative amortization feature	384,111	3.74%	144,756,400	8.64%
Other	1,271	0.01%	250,780	0.01%
Subprime & Alt-A Loans (13 servicers reporting)	4,959,707	100.00%	781,393,399	100.00%
Fixed rate, fully amortizing	2,538,045	51.17%	300,620,148	38.47%
Hybrid ARMs (2/28, 3/27s, or similar)	1,527,204	30.79%	282,402,876	36.14%
Adjustable rate, fully amortizing	76,131	1.53%	16,399,259	2.10%
Loans with interest only feature	348,955	7.04%	96,367,730	12.33%
Payment Option ARMs and other loans with negative amortization feature	127,967	2.58%	47,591,008	6.09%
Other	341,405	6.88%	38,012,377	4.86%

DELINQUENCY BY QUARTER OF INITIAL RESET

Number of Prime Loans

		30+ Days Past Due		Individual Company %		
		Number	%	High	Low	Median
4th Quarter 2007	27,560	6,167	22.38%	24.23%	14.08%	20.39%
1st Quarter 2008	19,890	3,003	15.10%	15.59%	11.11%	14.34%
2nd Quarter 2008	24,110	2,343	9.72%	10.11%	5.00%	8.56%
3rd Quarter 2008	30,683	3,436	11.20%	21.74%	7.35%	13.75%
4th Quarter 2008	22,472	1,829	8.14%	8.15%	6.67%	8.08%
1st Quarter 2009	17,350	1,251	7.21%	16.67%	7.12%	7.68%
2nd Quarter 2009	31,476	1,540	4.89%	20.00%	3.06%	5.27%
3rd Quarter 2009	31,930	1,863	5.83%	8.33%	2.56%	4.80%
Eight Quarter Total	205,471	21,432	10.43%			
Percent of Total Serviced	2.00%					
Percent of non-fixed rate products	6.90%					

UPB of Prime Loans

		30+ Days Past Due		Individual Company %		
		UPB	%	High	Low	Median
4th Quarter 2007	7,829,075	1,706,244	21.79%	22.88%	16.40%	20.86%
1st Quarter 2008	5,045,128	815,638	16.17%	17.19%	7.91%	15.06%
2nd Quarter 2008	5,713,169	601,882	10.54%	11.06%	4.08%	9.30%
3rd Quarter 2008	7,243,717	881,514	12.17%	16.94%	7.88%	11.45%
4th Quarter 2008	5,121,770	454,590	8.88%	8.93%	6.85%	8.87%
1st Quarter 2009	3,929,751	317,272	8.07%	15.10%	7.87%	9.24%
2nd Quarter 2009	7,890,879	395,877	5.02%	28.07%	3.13%	5.39%
3rd Quarter 2009	7,653,209	484,401	6.33%	6.85%	2.15%	3.74%
Eight Quarter Total	50,426,698	5,657,418	11.22%			
Percent of Total Serviced	3.01%					
Percent of non-fixed rate products	7.86%					

DELINQUENCY BY QUARTER OF INITIAL RESET

Number of Sub-Prime & Alt-A Loans

		30+ Days Past Due		Individual Company %		
		Number	%	High	Low	Median
4th Quarter 2007	87,903	40,148	45.67%	61.28%	36.34%	48.44%
1st Quarter 2008	111,720	45,520	40.74%	54.36%	27.76%	41.32%
2nd Quarter 2008	141,486	52,256	36.93%	47.29%	26.34%	36.14%
3rd Quarter 2008	184,154	71,823	39.00%	48.97%	26.95%	38.88%
4th Quarter 2008	187,610	73,762	39.32%	52.95%	23.50%	38.49%
1st Quarter 2009	141,849	51,447	36.27%	45.91%	17.58%	36.42%
2nd Quarter 2009	93,161	27,955	30.01%	52.95%	17.96%	29.09%
3rd Quarter 2009	62,886	17,935	28.52%	45.32%	17.36%	30.05%
Eight Quarter Total	1,010,769	380,846	37.68%			
Percent of Total Serviced	20.38%					
Percent of non-fixed rate products	41.74%					

UPB of Sub-Prime & Alt-A Loans

		30+ Days Past Due		Individual Company %		
		Number	%	High	Low	Median
4th Quarter 2007	19,225,767	8,674,663	45.12%	63.45%	33.81%	51.10%
1st Quarter 2008	23,048,468	9,697,710	42.08%	57.57%	29.05%	43.85%
2nd Quarter 2008	28,787,426	11,145,312	38.72%	50.53%	25.92%	39.65%
3rd Quarter 2008	38,987,971	16,140,159	41.40%	52.53%	28.98%	40.72%
4th Quarter 2008	41,059,172	17,371,524	42.31%	56.42%	24.57%	41.33%
1st Quarter 2009	31,631,116	12,521,084	39.58%	59.45%	18.59%	39.29%
2nd Quarter 2009	20,601,372	6,552,705	31.81%	56.08%	18.83%	31.78%
3rd Quarter 2009	14,441,681	4,000,876	27.70%	46.55%	17.43%	26.94%
Eight Quarter Total	217,782,972	86,104,033	39.54%			
Percent of Total Serviced	27.87%					
Percent of non-fixed rate products	45.30%					

DELINQUENCY & DEFAULT

Number of Prime Loans	Number	Individual Company (% of Serviced) High	Low	Median
30 to 59 days	271,804	39.97%	0.22%	2.29%
60 to 89 days	104,091	18.95%	0.72%	1.01%
90 days or over	176,893	80.00%	1.22%	1.89%
Total	552,788			
Percentage of Prime Loans Serviced	*5.38%*	*132.04%*	*0.22%*	*4.70%*
Loans from above which were modified in the last 12 months.	5,822			
Percentage of total past due	*1.05%*	*6.28%*	*0.03%*	*1.68%*
Loans which entered delinquency within 3 payments of initial rate reset	362			
Percentage of total past due	*0.07%*	*3.87%*	*0.29%*	*2.08%*
Loans where notice of default sent	9,029			
Loans where formal foreclosure proceedings started	31,733			
Total Loans in Process of Foreclosure	40,762			
Percentage of total past due	*7.37%*	*79.23%*	*0.11%*	*16.61%*
Loans where foreclosure proceeding completed (ORE)	27,510			

UPB of Prime Loans	UPB	Individual Company (% of Serviced) High	Low	Median
30 to 59 days	39,279,638	4.29%	0.15%	1.39%
60 to 89 days	15,300,461	1.58%	0.20%	0.88%
90 days or over	19,921,597	75.87%	0.26%	1.32%
Total	74,501,696			
Percentage of Prime Loans Serviced	*4.45%*	*75.87%*	*0.15%*	*3.74%*
Loans from above which were modified in the last 12 months.	900,883			
Percentage of total past due	*1.21%*	*5.46%*	*0.00%*	*0.77%*
Loans which entered delinquency within 3 payments of initial rate reset	126,846			
Percentage of total past due	*0.17%*	*3.42%*	*0.15%*	*0.81%*
Loans where notice of default sent	3,546,386			
Loans where formal foreclosure proceedings started	6,499,468			
Total Loans in Process of Foreclosure	10,045,854			
Percentage of total past due	*13.48%*	*90.33%*	*0.27%*	*17.45%*
Loans where foreclosure proceeding completed (ORE)	5,980,112			

DELINQUENCY & DEFAULT

Number of Sub-Prime & Alt-A Loans	Number	Individual Company (% of Serviced) High	Low	Median
30 to 59 days	355,422	9.77%	4.04%	7.56%
60 to 89 days	190,795	5.70%	2.47%	3.65%
90 days or over	630,967	22.37%	3.89%	15.95%
Total	1,177,184			
Percentage of Sub-Prime & Alt-A Loans Serviced	*23.73%*	*37.84%*	*13.14%*	*27.95%*
Loans from above which were modified in the last 12 months.	32,148			
Percentage of total past due	*2.73%*	*25.67%*	*0.05%*	*1.10%*
Loans which entered delinquency within 3 payments of initial rate reset	37,072			
Percentage of total past due	*3.15%*	*11.74%*	*0.09%*	*2.61%*
Loans where notice of default sent	135,996			
Loans where formal foreclosure proceedings started	161,962			
Total Loans in Process of Foreclosure	297,958			
Percentage of total past due	*25.31%*	*59.33%*	*0.81%*	*24.27%*
Loans where foreclosure proceeding completed (ORE)	133,540			

UPB of Sub-Prime & Alt-A Loans	UPB	Individual Company (% of Serviced) High	Low	Median
30 to 59 days	54,936,175	10.21%	3.96%	6.88%
60 to 89 days	31,212,143	6.39%	2.56%	3.94%
90 days or over	100,543,239	25.99%	3.01%	18.09%
Total	186,691,556			
Percentage of Sub-Prime & Alt-A Loans Serviced	*23.89%*	*41.94%*	*12.07%*	*29.69%*
Loans from above which were modified in the last 12 months.	5,506,175			
Percentage of total past due	*2.95%*	*25.39%*	*0.05%*	*1.19%*
Loans which entered delinquency within 3 payments of initial rate reset	7,485,477			
Percentage of total past due	*4.01%*	*12.57%*	*0.14%*	*3.37%*
Loans where notice of default sent	23,982,676			
Loans where formal foreclosure proceedings started	28,664,809			
Total Loans in Process of Foreclosure	52,647,485			
Percentage of total past due	*28.20%*	*63.61%*	*0.75%*	*31.92%*
Loans where foreclosure proceeding completed (ORE)	27,138,584			

LOSS MITIGATION & MODIFICATIONS

Number of Loans In-Process	Number	**%**	Individual Company (% allocation) High	Low	Median
Deed in lieu	3,670	1.41%	2.47%	0.02%	0.55%
Short sale	31,450	12.05%	34.50%	3.39%	9.09%
Total in process with borrower losing home	35,120	13.46%			
*Percent of past due 60 days+**	*3.42%*		*7.02%*	*0.35%*	*1.72%*
Forbearance	16,947	6.50%	47.23%	0.31%	3.57%
Repayment plan	49,615	19.02%	54.49%	2.22%	17.93%
Modification (principal reduction, interest rate &/or term of debt)	139,191	53.35%	81.47%	9.14%	33.97%
Total in process of home retention	205,753	78.86%			
*Percent of past due 60 days+**	*20.06%*		*42.48%*	*1.80%*	*13.79%*
Refinance or paid in full	5,279	2.02%	48.10%	1.94%	2.45%
Reinstatement/Account to be made current	14,747	5.65%	69.74%	2.19%	2.76%
Total in process of being resolved by borrower	20,026				
*Percent of past due 60 days+**	*1.95%*		*7.70%*	*0.49%*	*2.26%*
Total loans in loss mitigation	260,899	100.00%			
*Percent of past due 60 days+**	*25.44%*		*46.46%*	*5.54%*	*19.30%*

UPB of Loans In Process	UPB	%	Individual Company (% allocation) High	Low	Median
Deed in lieu	884,842	1.73%	2.90%	0.01%	0.56%
Short sale	7,320,986	14.33%	37.81%	4.01%	10.73%
Total in process of borrower losing home	8,205,828	16.06%			
*Percent of past due 60 days+**	*5.19%*		*10.20%*	*0.48%*	*2.40%*
Forbearance	2,563,158	5.02%	46.61%	0.39%	3.15%
Repayment plan	8,866,965	17.35%	49.80%	3.11%	15.99%
Modification (principal reduction, interest rate &/or term of debt)	28,185,048	55.16%	81.21%	10.05%	36.47%
Total in process of home retention	39,615,171	77.54%			
*Percent of past due 60 days+**	*25.07%*		*46.52%*	*2.33%*	*14.90%*
Refinance or paid in full	1,008,996	1.97%	31.01%	0.06%	2.81%
Reinstatement/Account made current	2,262,896	4.43%	37.18%	1.38%	4.69%
Total in process of being resolved by borrower	3,271,891	6.40%			
*Percent of past due 60 days+**	*2.07%*		*8.41%*	*0.01%*	*2.34%*
Total loans in loss mitigation	51,092,890	100.00%			
*Percent of past due 60 days+**	*32.34%*		*52.48%*	*8.83%*	*24.03%*

**Denominator adjusted to remove two companies which do not currently track modifications in process.*

LOSS MITIGATION & MODIFICATIONS

Number of Loans Closed	Number	%	Individual Company (% allocation) High	Low	Median
Deed in lieu	339	0.38%	2.79%	0.03%	0.41%
Short sale	3,943	4.40%	24.87%	0.18%	4.26%
Total closed with borrower losing home	4,282	4.78%			
Forbearance	3,459	3.86%	11.65%	0.39%	2.92%
Repayment plan	24,096	26.91%	76.19%	1.31%	22.70%
Modification (principal reduction, interest rate &/or term of debt)	24,264	27.10%	88.95%	4.30%	23.74%
Total closed solutions with home retention	51,819	57.87%			
Refinance or paid in full	11,579	12.93%	48.10%	0.67%	2.79%
Reinstatement/Account made current	21,868	24.42%	69.74%	2.19%	7.87%
Total closed with resolution by borrower	33,447	37.35%			
Total	89,548	100.00%			
Prepayment penalty waived (from any of the above)	335				

UPB of Loans Closed	UPB	%	Individual Company (% allocation) High	Low	Median
Deed in lieu	75,852	0.55%	2.67%	0.03%	0.51%
Short sale	581,695	4.24%	26.85%	0.05%	4.01%
Total closed with borrower losing home	657,547	4.79%			
Forbearance	516,953	3.77%	13.64%	0.55%	2.60%
Repayment plan	3,901,565	28.42%	76.26%	0.95%	26.40%
Modification (principal reduction, interest rate &/or term of debt)	4,469,054	32.56%	90.47%	6.22%	25.65%
Total closed solutions with home retention	8,887,572	64.74%			
Refinance or paid in full	1,512,944	11.02%	44.85%	0.14%	2.07%
Reinstatement/Account made current	2,668,982	19.44%	68.29%	1.12%	6.42%
Total closed with resolution by borrower	4,181,926	30.46%			
Total	13,727,046	100.00%			
Prepayment penalty waived (from any of the above)	44,320				

	Number	Individual Company High	Low	Median
PROFILE OF MODIFICATIONS BY NUMBER OF LOANS				
Time horizon for **closed** loan modifications				
Modification effective for less than life of loan (e.g. 2 years)				
Modification effective for life of loan				
Did not report				
Types of modifications **closed**				
Modification by freezing interest rate at the initial/start rate				
Modification by reducing the interest rate below the initial/start rate				
Modification by reducing the interest rate below scheduled reset rate, but above start rate				
Modification with extension of term				
Modification with reduction in principal balance				
Modification using two or more of above modifications (e.g. rate reduction and term change)				
Other modification				
PROFILE OF MODIFICATIONS BY UPB OF LOANS				
Time horizon for **closed** loan modifications				
Modification effective for less than life of loan (e.g. 2 years)				
Modification effective for life of loan				
Did not report				
Types of modifications **closed**				
Modification by freezing interest rate at the initial/start rate				
Modification by reducing the interest rate below the initial/start rate				
Modification by reducing the interest rate below scheduled reset rate, but above start rate				
Modification with extension of term				
Modification with reduction in principal balance				
Modification using two or more of above modifications (e.g. rate reduction and term change)				
Other modification				

This data is in process of being collected and will be available in future releases.

Notes

For the individual company data, the Low and Average do not include companies which reported a zero value.

Number of Companies reporting a zero value in the following significant reporting items:

Delinquent sub-prime/Alt-A loans which entered delinquency within 3 payments of initial rate reset		2
In Process:	Deed in lieu	3
	Short sale	2
	Forebearance	5
	Repayment plan	2
	Modification	2
	Refinance or paid in full	6
	Reinstatement / account made current	4
Closed:	Deed in lieu	4
	Short sale	0
	Forebearance	2
	Repayment plan	1
	Modification	0
	Refinance or paid in full	0
	Reinstatement / account made current	0

APPENDIX B

CONSOLIDATED STATE REPORT FOR MORTGAGE SERVICERS
TREND DATA FROM OCTOBER 2007 TO JANUARY 2008

Trend Data from Consolidated State Report for Mortgage Servicers

All dollar amounts are the unpaid principal balance (UPB) and are in thousands (000's).
All numbers of loans are the actual number.

	January	December	November	October	Percentage Change			
					Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
Number of Servicers Reporting	13	13	13	13				
Initial Rate Reset & Delinquency								
Percentage of loans scheduled for initial rate reset in the next 8 quarters which are currently 30+ days delinquent								
Prime	10.43%	9.65%	8.45%	7.36%				
Sub-Prime & Alt- A	37.68%	36.57%	34.13%	30.74%				
DELINQUENCY & DEFAULT								
Number of Prime Loans								
30 to 59 days	271,804	297,434	245,242	238,446	13.99%	-8.62%	21.28%	2.85%
60 to 89 days	104,091	110,043	88,619	88,202	18.01%	-5.41%	24.18%	0.47%
90 days or over	176,893	185,104	128,608	62,073	184.98%	-4.44%	43.93%	107.19%
Total	552,788	592,581	462,469	388,721	42.21%	-6.72%	28.13%	18.97%
Percentage of Prime Loans Serviced	5.38%	5.78%	4.60%	3.78%				
Loans from above which were modified in the last 12 months.	5,822	6,659	5,848	5,348	8.86%	-12.57%	13.87%	9.35%
Percentage of total past due	1.05%	1.12%	1.26%	1.38%				
Loans which entered delinquency within 3 payments of initial rate reset	362	378	304	310	16.77%	-4.23%	24.34%	-1.94%
Percentage of total past due	0.07%	0.06%	0.07%	0.08%				
Loans where notice of default sent	9,029	11,269	8,921	9,538	-5.34%	-19.88%	26.32%	-6.47%
Loans where formal foreclosure procedings started	31,733	35,502	31,616	28,433	11.61%	-10.62%	12.29%	11.19%
Total Loans in Process of Foreclosure	40,762	46,771	40,537	37,971	7.35%	-12.85%	15.38%	6.76%
Percentage of total past due	7.37%	7.89%	8.77%	9.77%				
Loans where foreclosure preceding completed (ORE)	27,510	26,707	27,293	23,944	14.89%	3.01%	-2.15%	13.99%

DELINQUENCY & DEFAULT

UPB of Prime Loans	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
30 to 59 days	39,279,638	43,111,094	38,996,319	36,413,811	7.87%	-8.89%	10.55%	7.09%
60 to 89 days	15,300,461	16,357,821	14,720,023	14,258,173	7.31%	-6.46%	11.13%	3.24%
90 days or over	19,921,597	22,873,507	19,863,859	9,125,764	118.30%	-12.91%	15.15%	117.67%
Total	74,501,696	82,342,422	73,580,201	59,797,748	24.59%	-9.52%	11.91%	23.05%
Percentage of Prime Loans Serviced	4.45%	5.10%	4.64%	3.73%				
Loans from above which were modified in the last 12 months.	900,883	1,043,653	905,780	813,347	10.76%	-13.68%	15.22%	11.36%
Percentage of total past due	1.21%	1.27%	1.23%	1.36%				
Loans which entered delinquency within 3 payments of initial rate reset	126,846	134,092	106,337	112,468	12.78%	-5.40%	26.10%	-5.45%
Percentage of total past due	0.17%	0.16%	0.14%	0.19%				
Loans where notice of default sent	3,546,386	4,345,082	3,531,460	3,802,116	-6.73%	-18.38%	23.04%	-7.12%
Loans where formal foreclosure procedings started	6,499,468	7,351,150	6,465,924	5,783,470	12.38%	-11.59%	13.69%	11.80%
Total Loans in Process of Foreclosure	10,045,854	11,696,232	9,997,384	9,585,585	4.80%	-14.11%	16.99%	4.30%
Percentage of total past due	13.48%	14.20%	13.59%	16.03%				
Loans where foreclosure preceding completed (ORE)	5,980,112	6,011,207	5,922,818	5,165,182	15.78%	-0.52%	1.49%	14.67%

DELINQUENCY & DEFAULT	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
Number of Sub-Prime & Alt-A Loans								
30 to 59 days	355,422	379,068	374,411	356,849	-0.40%	-6.24%	1.24%	4.92%
60 to 89 days	190,795	199,286	192,709	186,695	2.20%	-4.26%	3.41%	3.22%
90 days or over	630,967	618,158	660,203	542,723	16.26%	2.07%	-6.37%	21.65%
Total	1,177,184	1,196,512	1,242,292	1,086,267	8.37%	-1.62%	-3.69%	14.36%
Percentage of Sub-Prime & Alt-A Loans Serviced	23.73%	23.60%	24.00%	21.25%				
Loans from above which were modified in the last 12 months.	32,148	35,722	26,762	22,522	42.74%	-10.01%	33.48%	18.83%
Percentage of total past due	2.73%	2.99%	2.18%	2.07%				
Loans which entered delinquency within 3 payments of initial rate reset	37,072	33,047	31,857	30,986	19.64%	12.18%	3.74%	2.81%
Percentage of total past due	3.15%	2.76%	2.60%	2.85%				
Loans where notice of default sent	135,996	135,325	121,366	135,024	0.72%	0.50%	11.50%	-10.12%
Loans where formal foreclosure procedings started	161,962	160,104	153,181	140,203	15.52%	1.16%	4.52%	9.26%
Total Loans in Process of Foreclosure	297,958	295,429	274,547	275,227	8.26%	0.86%	7.61%	-0.25%
Percentage of total past due	25.31%	24.69%	22.37%	25.34%				
Loans where foreclosure preceding completed (ORE)	133,540	125,402	115,233	102,538	30.23%	6.49%	8.82%	12.38%

DELINQUENCY & DEFAULT

UPB of Sub-Prime & Alt-A Loans	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
30 to 59 days	54,936,175	57,991,375	57,715,248	54,777,258	0.29%	-5.27%	0.48%	5.36%
60 to 89 days	31,212,143	32,280,167	31,269,978	30,275,397	3.09%	-3.31%	3.23%	3.29%
90 days or over	100,543,239	97,393,169	103,140,085	82,763,152	21.48%	3.23%	-5.57%	24.62%
Total	186,691,556	187,664,711	192,125,312	167,815,807	11.25%	-0.52%	-2.32%	14.49%
Percentage of Sub-Prime & Alt-A Loans Serviced	23.89%	23.43%	23.87%	20.91%				
Loans from above which were modified in the last 12 months.	5,506,175	6,041,625	4,338,864	3,562,013	54.58%	-8.86%	39.24%	21.81%
Percentage of total past due	2.95%	3.22%	2.26%	2.12%				
Loans which entered delinquency within 3 payments of initial rate reset	7,485,477	6,356,556	5,846,870	5,378,363	39.18%	17.76%	8.72%	8.71%
Percentage of total past due	4.01%	3.39%	3.04%	3.20%				
Loans where notice of default sent	23,982,676	23,458,517	21,168,389	25,219,053	-4.90%	2.23%	10.82%	-16.06%
Loans where formal foreclosure procedings started	28,664,809	28,201,039	31,512,264	28,715,404	-0.18%	1.64%	-10.51%	9.74%
Total Loans in Process of Foreclosure	52,647,485	51,659,556	52,680,654	53,934,457	-2.39%	1.91%	-1.94%	-2.32%
Percentage of total past due	28.20%	27.53%	27.42%	32.14%				
Loans where foreclosure preceding completed (ORE)	27,138,584	25,128,957	22,022,922	19,080,954	42.23%	8.00%	14.10%	15.42%

LOSS MITIGATION & MODIFICATIONS	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
Number of Loans In-Process								
Deed in lieu	3,670	4,711	4,451	3,663	0.19%	-22.10%	5.84%	21.51%
Short sale	31,450	31,009	29,475	24,365	29.08%	1.42%	5.20%	20.97%
Total in process with borrower losing home	35,120	35,720	33,926	28,028	25.30%	-1.68%	5.29%	21.04%
Percent of past due 60 days+	3.42%	3.43%	3.62%	3.42%				
Forbearance	16,947	17,855	18,102	16,222	4.47%	-5.09%	-1.36%	11.59%
Repayment plan	49,615	49,059	59,447	59,991	-17.30%	1.13%	-17.47%	-0.91%
Modification (principal reduction, interest rate &/or term c	139,191	117,051	99,692	89,147	56.14%	18.91%	17.41%	11.83%
Total in process of home retention	205,753	183,965	177,241	165,360	24.43%	11.84%	3.79%	7.18%
Percent of past due 60 days+	20.06%	17.68%	18.89%	20.17%				
Refinance or paid in full	5,279	6,414	7,167	3,206	64.66%	-17.70%	-10.51%	123.55%
Reinstatement/Account to be made current	14,747	11,484	11,348	12,926	14.09%	28.41%	1.20%	-12.21%
Total in process of being resolved by borrower	20,026	17,898	18,515	16,132	24.14%	11.89%	-3.33%	14.77%
Percent of past due 60 days+	1.95%	1.72%	1.97%	1.97%				
Total loans in loss mitigation	260,899	237,583	229,682	209,520	24.52%	9.81%	3.44%	9.62%
Percent of past due 60 days+	25.44%	22.84%	24.48%	25.56%				

LOSS MITIGATION & MODIFICATIONS

UPB of Loans In Process	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
Deed in lieu	884,842	1,143,585	1,078,053	883,044	0.20%	-22.63%	6.08%	22.08%
Short sale	7,320,986	7,122,576	6,504,175	5,260,935	39.16%	2.79%	9.51%	23.63%
Total in process of borrower losing home	8,205,828	8,266,161	7,582,228	6,143,980	33.56%	-0.73%	9.02%	23.41%
Percent of past due 60 days+	5.19%	5.15%	5.16%	4.73%				
Forbearance	2,563,158	2,842,774	2,992,909	2,618,905	-2.13%	-9.84%	-5.02%	14.28%
Repayment plan	8,866,965	8,830,697	10,517,134	10,139,747	-12.55%	0.41%	-16.04%	3.72%
Modification (principal reduction, interest rate &/or term c	28,185,048	23,632,958	19,274,083	16,080,207	75.28%	19.26%	22.62%	19.86%
Total in process of home retention	39,615,171	35,306,428	32,784,125	28,838,858	37.37%	12.20%	7.69%	13.68%
Percent of past due 60 days+	25.07%	21.98%	22.31%	22.18%				
Refinance or paid in full	1,008,996	1,144,067	1,239,074	704,512	43.22%	-11.81%	-7.67%	75.88%
Reinstatement/Account made current	2,262,896	1,804,164	1,756,235	2,052,634	10.24%	25.43%	2.73%	-14.44%
Total in process of being resolved by borrower	3,271,891	2,948,231	2,995,310	2,757,146	18.67%	10.98%	-1.57%	8.64%
Percent of past due 60 days+	2.07%	1.84%	2.04%	2.12%				
Total loans in loss mitigation	51,092,890	46,520,821	43,361,663	35,589,060	43.56%	9.83%	7.29%	21.84%
Percent of past due 60 days+	32.34%	28.96%	29.51%	27.37%				

LOSS MITIGATION & MODIFICATIONS	January	December	November	October	Oct to Jan	Dec to Jan	Nov to Dec	Oct to Nov
Number of Loans Closed								
Deed in lieu	339	317	275	356	-4.78%	6.94%	15.27%	-22.75%
Short sale	3,943	3,960	3,449	3,456	14.09%	-0.43%	14.82%	-0.20%
Total closed with borrower losing home	4,282	4,277	3,730	3,812	12.33%	0.12%	14.66%	-2.15%
Forbearance	3,459	3,413	3,124	3,136	10.30%	1.35%	9.25%	-0.38%
Repayment plan	24,096	19,564	19,625	21,843	10.31%	23.16%	-0.31%	-10.15%
Modification (principal reduction, interest rate &/or term of debt)	24,264	19,935	22,154	19,082	27.16%	21.72%	-10.02%	16.10%
Total closed solutions with home retention	51,819	42,912	44,903	44,061	17.61%	20.76%	-4.43%	1.91%
Refinance or paid in full	11,579	9,327	11,186	8,573	35.06%	24.14%	-16.62%	30.48%
Reinstatement/Account made current	21,868	18,382	18,712	19,601	11.57%	18.96%	-1.76%	-4.54%
Total closed with resolution by borrower	33,447	27,709	29,898	28,174	18.72%	20.71%	-7.32%	6.12%
Total	89,548	74,898	78,525	76,047	17.75%	19.56%	-4.62%	3.26%
Percentage of the previous month's in-process	37.69%	32.61%	37.48%					
Prepayment penalty waived (from any of the above)	335	344	279	236	41.95%	-2.62%	23.30%	18.22%
UPB of Loans Closed								
Deed in lieu	75,852	74,832	56,470	71,679	5.82%	1.36%	32.52%	-21.22%
Short sale	581,695	513,220	433,173	618,663	-5.98%	13.34%	18.48%	-29.98%
Total closed with borrower losing home	657,547	588,052	489,643	690,343	-4.75%	11.82%	20.10%	-29.07%
Forbearance	516,953	495,766	421,588	443,615	16.53%	4.27%	17.60%	-4.97%
Repayment plan	3,901,565	3,017,291	3,031,761	3,358,630	16.17%	29.31%	-0.48%	-9.73%
Modification (principal reduction, interest rate &/or term of debt)	4,469,054	3,569,723	4,217,612	3,340,759	33.77%	25.19%	-15.36%	26.25%
Total closed solutions with home retention	8,887,572	7,082,780	7,670,960	7,143,004	24.42%	25.48%	-7.67%	7.39%
Refinance or paid in full	1,512,944	1,273,470	1,152,006	1,814,769	-16.63%	18.80%	10.54%	-36.52%
Reinstatement/Account made current	2,668,982	2,387,497	2,399,345	2,521,715	5.84%	11.79%	-0.49%	-4.85%
Total closed with resolution by borrower	4,181,926	3,660,967	3,551,351	4,336,484	-3.56%	14.23%	3.09%	-18.11%
Total	13,727,046	11,331,800	11,711,954	12,169,830	12.80%	21.14%	-3.25%	-3.76%
Percentage of the previous month's in-process	29.51%	26.13%	32.91%					
Prepayment penalty waived (from any of the above)	44,320	37,821	19,691	14,500	205.65%	17.18%	92.07%	35.80%