



March 31, 2011

## LLC Data Submission Issues for Commercial Deals

The FDIC will maintain a data submission issues document for LLC partners and FDIC staff. The purpose of this list is to highlight the nature of submission errors and address feedback about the Commercial LLC data specification and submission process in order to improve the quality and turnaround time of the data.

### Formatting:

- a) File should be stored as "Excel 2003" .xls extension rather than .xlsx extension. .xlsx extension is for "excel 2007" format.
- b) Postal codes may be either 5 or 9 digits. Please do not include any spaces or dashes. Codes should be right justified.
- c) Numeric fields should contain only numbers (no alphabetic characters, no percent signs). Decimal points and leading minus signs are permitted.
- d) Balances should contain 2 decimal places, percentages should have five (5.125% should be given as .05125).
- e) Date fields should follow the (YYYYMMDD) specification and be positive values.

### Enumerations:

Enumerations are data element values provided in the FDIC LLC Specification. Only those values provided in the Specification may be included in a file submission.

- a) **NAV** and **NAP** codes should be used when they are included as valid enumeration choices. Please do not provide these values if they are not included as a permissible enumeration.
- b) The Data Specification file shows "**n/a**" in many of the enumeration fields. Please interpret the 'n/a' as 'no enumeration is required'.
- c) In cases where the loan maturity date falls within the reporting period, the **ZeroBalanceCode** should be populated with the code "**FullPayoffatMaturity**" given the loan pays in full. Conversely, if the loan is paid off prior to the maturity date provided, the code "**PayoffPriorToMaturity**" is used.
- d) Short Sales should be coded with the **ZeroBalanceCode** "**DPO**" and **WorkoutStrategy** should indicate "**ShortSale**".
- e) **PaymentHistory** code of 7=BR represents Bankruptcy
- f) **PaymentHistory** codes should be interpreted as follows: "1=30 days" means delinquent 30 to 59 days for the Due Period month, "2=60 days" means delinquent 60 to 89 days, and so forth. Codes may be separated by pipe delimiters. Note that the most recent month should be the last digit in the numeric string. The submitted string should always be 12 characters long; missing data for a given 12 months submission should be blank (1 character of the string).
- g) Clarification is provided for the following enumerated values:

Y = Yes

N = No

NAP = Not Applicable

NAV = Not Available

- h) The definitions of **PropertyStatus**, **DefeasanceStatusType**, and **DefeasanceOptionStartDate** contain references to 'defeasance'. These fields may be relevant if substitute collateral is accepted for loans with prepayment penalties or yield maintenance provisions.
- i) The field **OtherPrincipalAdjustments** is currently defined as: "Any other amounts that would cause the principal balance of the loan to be decreased or increased in the current period which are not considered **Unscheduled Principal Collections** and are not **Scheduled Principal Amounts**. Examples include cash and non-cash adjustments necessary to synchronize the servicer's records with the securitized collateral supporting the outstanding bonds. A negative amount should be reported for an increase in the balance, and a positive amount should be reported for a decrease in the balance."
- j) Sometimes the FDIC enumeration values do not align perfectly with internal servicing systems codes. Please first try and choose the code that most closely matches the data submitted. If unique values exist which do not align with any FDIC enumeration value, please provide this information to your Asset Management and Data Specialist for review. Your Data Specialist will indicate if this is a permissible value.
- k) A related issue has occurred with the commercial field **CollateralType**; if the code "Other" is indicated for the majority of properties, please contact your Asset Management and Data Specialist to determine whether any of the 15 codes for **CollateralType** may be more accurate descriptors or if additional Collateral descriptors are required.

#### **Reporting Tips:**

- a) **Escrow Payment** amount should reflect only the borrower's portion.
- b) **Escrow Balance** may be a positive or negative value.
- c) **Subsequent Recovery Expense Amount** should capture net recoveries received post liquidation. Amounts should be reported only if recovery activity occurs during the current reporting period.
- d) Loan fields that describe *loan restructuring* should be populated in the month the loan restructuring occurs.
- e) **RemainingAmortizationTerm** and similar maturity related fields should be positive numbers.
- f) If a **ZeroBalanceCode** is appropriate for a loan during a reporting period, the associated cash flows should also be reflected in the Cash Flow and Distribution report.
- g) If a short sale or deed-in-lieu is executed, gross and net proceeds amounts should be reported in **ShortSaleAcceptedOfferAmount** field and **NetSaleProceeds**, respectively.
- h) In the event of a Sale and/or chargeoff that reduces the UPB to zero, the last day of the month of the event may be used as the **ZeroBalanceEffectiveDate**.
- i) For loans in which the Company is a participant, the gross UPB of the entire loan should be reported in the field **UPBAmount** and the balance owned by the Company should be reported in the field **BalanceOwned**.
- j) Sales of commercial REO should contain the **ZeroBalanceCode** of "Disposition"
- k) **ActualPrincipalPaid** should include only regular and prepaid principal payments. Loan sales are included in the **NetProceedsFromLiquidation**.
- l) **Chargeoffs** represent the cumulative loss amount realized since origination and are typically not the same as the UPB amount reduced to zero when sales occur.
- m) **Chargeoffs** are recorded during the month of liquidation in cases of a deficient payoff.

- n) When the principal of a loan is paid in full during the Due Period (reported month of activity), the **ActualPrincipalPaid** and **PrincipalPaidinFullCollections** fields should be equal to the payoff amount.
- o) **MostRecentValue** should be updated based on the required frequency indicated in the Operating Agreement.
- p) File should include only loans active or owned in the reporting month. Loan sales and payoffs that occurred in any previous month should be removed. However, any loan that experiences a subsequent recovery should be included for that month only.
- q) **BalanceatForeclosure** should reflect the remaining balance owned by the LLC (participated balance) at time of foreclosure.