



March 31, 2011

LLC Data Submission Issues for Single-Family 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 Single-family 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 commercial & single-family FDIC Data Specification files show "**n/a**" in many of the enumeration fields. Please interpret the 'n/a' as 'no enumeration is required'.
- c) Enumeration codes must adhere to the codes prescribed in the specification. (e.g, **SFPropertyType** of 'condominium' is only readable as 'condo'). Please comply with the enumeration codes detailed in the specification document.
- d) 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. For example, for **SFPropertyType**, the FDIC spec does not provide a code for *cooperatives*; the closest available code would be 'condo'. 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.
- e) LLC partner servicer systems at times combine codes while the FDIC defines two groupings. For example, **PropertyCurrentOccupancyType**, 'Abandoned' and 'Vacant' are two distinct codes while the LLC servicing system submitted "Vacant abandoned or otherwise unoccupied". In such instances, contact your Asset Management and Data Specialist for review.
- f) In cases where the loan maturity date falls either on or after the month of the reporting period, the **ZeroBalanceCode** should be populated with the code "**PrepaidorMatured**" given the loan pays in full.
- g) **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).

- h) The **ExceptionalLoanStatus** field should be left blank if the loan is current or delinquent but not in bankruptcy, foreclosure, or REO.
- i) **PaymentHistory** code of 7=BR represents Bankruptcy
- j) Clarification is provided for the following enumerated values:
 - Y = Yes
 - N = No
 - NAP = Not Applicable
 - NAV = Not Available
- k) 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.”

Reporting Tips:

- a) **EscrowPayment** amount should reflect only the borrower’s portion.
- b) **EscrowBalance** may be a positive or negative value.
- c) **SubsequentRecoveryExpenseAmount** 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 *modifications* should be populated in the month the modification occurs. These fields include **InterestCapitalizedAmount, EscrowCapitalizedAmount, OthAdvancesCapitalizedAmount, CapitalizedModificationFeesAmount, TotalDeferredAmount, ForgivenPrincipalAmount, NumberofModifications, ForgivenNonPIAdvances, ReimbursableModificationEscrowandCorporateAdvances.**
- e) If a **ZeroBalanceCode** is specified for a loan during a reporting period, the associated cash flows should also be reflected in the Cash Flow and Distribution report.
- f) If a short sale or deed-in-lieu is executed, gross and net proceeds should be provided in **ShortSaleAcceptedOfferAmount** field and **NetSaleProceeds** . Similarly, if **REOLiquidation** is populated, the **REODate** and **NetSaleProceeds** fields are required.
- g) In the event of any type of 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.**
- h) **ActualPrincipalPaid** should include only regular and prepaid principal payments. Loan sales are included in the **NetProceedsFromLiquidation.**
- i) **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.
- j) **Chargeoffs** are recorded during the month of liquidation given a deficient payoff occurs.
- k) 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.
- l) 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.
- m) Deferred amounts should be reflected in the UPBAmount.