STANDARD & POOR'S

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New Issue: Bankinter 18, Fondo de Titulizacion de Activos

€1. 5 Billion Mortgage-Backed Floating-Rate Notes

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Ratings Detail

Class	Rating*	Amount (Mil. €)	Available credit support¶ (%)	Interest	Legal final maturity
A	AAA	1,404.7	9.35	Three-month EURIBOR plus 30 bps	Jan. 23, 2052
B	A	65.3	5.00	Three-month EURIBOR plus 50 bps	Jan. 23, 2052
C	BBB	30.0	3.00	Three-month EURIBOR plus 70 bps	Jan. 23, 2052

*Standard & Poor's ratings address timely interest and ultimate principal. EURIBOR—European interbank offered rate.

Transaction Participants	
Originator	Bankinter S.A.
Arranger	Bankinter S.A. and Europea de Titulización S.G.F.T., S.A.
Seller	Bankinter S.A.
Mortgage administrator/servicer	Bankinter S.A.
Security trustee	Europea de Titulización S.G.F.T., S.A.
Interest swap counterparty	Bankinter S.A.
Transaction account provider	Bankinter S.A.

Supporting Ratings	
	Rating
Bankinter S.A. as interest swap counterparty and transaction account provider	A/Stable/A-1

Transaction Key Features	
Closing date	Nov. 11, 2008
Collateral	First-ranking mortgage loans and credits backed by residential properties (98.13%) and commercial properties (1.87%)
Principal outstanding (€)	1,500,000.00
Country of origination	Spain
Concentration	19.89% of the pool is concentrated in Catalonia, 18.32% in Madrid %14.06% in Andalucía, and 13.54% in Valencia
Weighted-average LTV ratio (%)	58.62
Average loan size balance (€)	173,130.0
Loan size range (€)	45,205.04 to 999,095.53
Weighted-average seasoning (months)	15.99
Weighted-average mortgage interest rate (%)	5.38
Weighted-average margin at closing (%)	0.35
Redemption profile	100% of the loans are amortizing
Cash reserve (%)	3
Mortgage priority	100% first-ranking mortgages

Transaction Key Features (cont.)	
Maximum LTV ratio (%)	99.93
Number of jumbo loans (>€400,000)	249

Transaction Summary

Standard & Poor's Ratings Services has assigned credit ratings to the €1.5 billion mortgage-backed floating-rate notes issued by Bankinter 18 Fondo de Titulización de Activos.

The originator is Bankinter S.A. At closing, Bankinter sold the issuer a €1.5 billion closed pool of mortgage loans and mortgage credits backed by first-ranking mortgages.

To fund this purchase, Bankinter 18 issued three classes of floating-rate, quarterly paying notes.

Bankinter 18 is a fund whose sole purposes are to purchase the collateral from Bankinter, issue the notes, and carry out related activities. The issuer holds a distinct and closed pool of assets available for distribution to the noteholders. The assets are insulated from the insolvency of the originator and the trustee.

The ratings on the notes reflect the subordination of the respective classes of notes below them, the cash reserve account, the interest rate swap, and comfort provided by various other contracts.

Bankinter, which ranks among the top 10 Spanish banks, mainly focuses on three areas: retail, wholesale corporate, and private banking. Bankinter was founded in 1965 as a joint venture between the former Banco de Santander and Bank of America. Since then, both banks have divested their participations and Bankinter's shares are widely held and publicly traded on the Madrid stock market.

Notable Features

This is the 18th securitization of Bankinter's mortgage credits and the fourth where "Hipoteca SIN" credits are being securitized. Hipoteca SIN credits are flexible loans that allow borrowers, with Bankinter's approval, to take payment holidays, make additional draws, and increase the term of their mortgage credit.

As in the previous Bankinter residential mortgage-backed securities (RMBS) transaction (Bankinter 17), a small percentage of the loans from the pool are backed not by residential properties, but by commercial properties.

In this transaction, Bankinter acts as originator, servicer, transaction accounts provider, and swap counterparty.

As in other Spanish transactions, interest and principal are combined into a single priority of payments, with some triggers in the payment of interest to protect senior noteholders.

Strengths, Concerns, And Mitigating Factors

Strengths

- The collateral is of a high quality, comprising first-ranking mortgage loans, with a weighted-average loan-to-value (LTV) ratio of 58.62% and an average seasoning of 15.99 months.
- There is adequate credit enhancement for the target ratings. The cash reserve, which was fully funded at closing

using a subordinated loan, and the excess spread, are both available to cover any interest or principal shortfalls.

- Bankinter has servicing and securitization experience; this is its 18th RMBS transaction.
- There is a swap agreement between the issuer and Bankinter to mitigate interest rate basis risk in the transaction. This swap guarantees the cost of the notes and 30 basis points (bps).
- Loans over 18 months in arrears are written off, allowing for an early excess spread trapping mechanism.

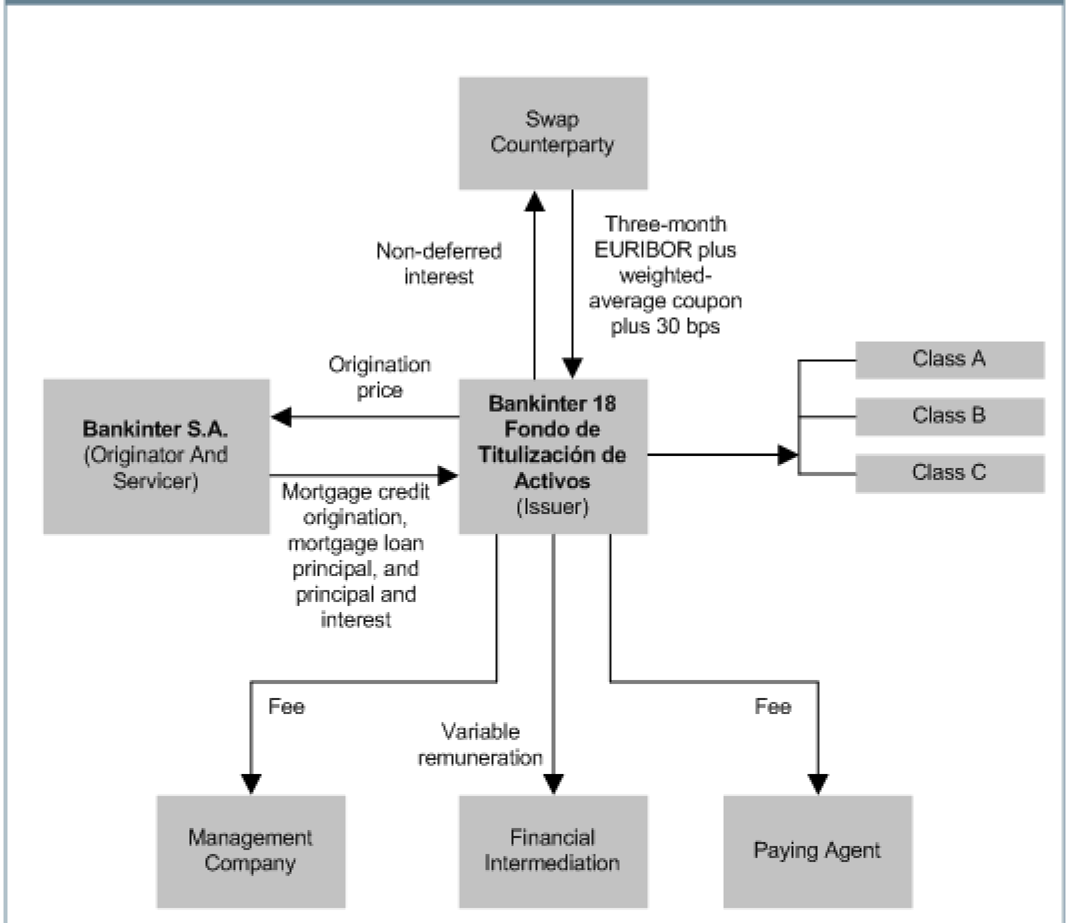
Concerns and mitigating factors

- 22.27% of the pool comprises Hipoteca SIN flexible credits that allow borrowers to take payment holidays, make further drawdowns, and increase the term of their mortgage credit. Our analysis of the portfolio has taken into account the characteristics of the Hipoteca SIN products, which are in all cases subject to Bankinter's approval.
- The excess spread of the pool may decrease from its current margin of 37 bps because mortgage credit can be renegotiated at the borrowers' request. Bankinter as swap counterparty covers the cost of the notes and guarantees 30 bps.
- Of the loans in the pool, 1.87% are secured by a commercial property rather than a residential one. We have taken this into account in our credit analysis of the pool.
- The pool has geographical concentration: 65.81% of the pool is concentrated in Valencia, Madrid, Catalonia, and Andalucía. We have taken into account the presence of any regional concentrations in our portfolio analysis.

Transaction Structure

At closing, the originator issued mortgage certificates ("certificados de transmission hipotecaria"; CTHs) that Europea de Titulización S.G.F.T., S.A., the trustee, purchased on the issuer's behalf (see chart 1).

Chart 1: Bankinter 18 Fondo de Titulización de Activos Transaction Structure



Each CTH represents, in equal amount and interest rate, the securitized mortgage loans and mortgage credits. The CTHs entitle Bankinter 18 to any rights and proceeds due under principal and interest on the mortgage loans and the credit line first draws.

The total outstanding amount of the mortgage credits and mortgage loans purchased for the final pool was €1.5 billion. To fund the purchase of collateral, Bankinter 18 issued three classes of rated notes. The reserve fund was fully funded on the closing date through a subordinated loan.

The collateral is serviced by Bankinter, which collects the amounts due under the mortgages. It then transfers the collected installments weekly into the treasury account.

The issuer entered into an asset swap agreement with Bankinter to hedge any basis risk resulting from the differences between the index on the mortgages in the pool and the reference interest rate on the notes. The fund pays 12-month EURIBOR from the collateral. The swap counterparty pays three-month EURIBOR plus the weighted-average coupon plus 30 bps.

On each quarterly interest payment date, the issuer pays, in arrears, the interest due to the noteholders. To make the payments, the issuer has as available funds the proceeds of the interest swap, interest earned on the transaction accounts, the reserve fund, and, if necessary, principal received under the mortgage credit and any other proceeds received in connection with the mortgage credit.

All interest and principal received can be mixed to pay principal and interest due under the notes. There is a trigger so that in a stressful economic environment the more senior notes amortize before interest on the subordinated classes of notes is paid (see "Priority of payments").

Bankinter S.A., Originator And Servicer

The rating on Spain-based Bankinter (A/Stable/A-1) is supported by the bank's business flexibility, innovative culture, sophisticated management, outstanding efficiency, excellent asset quality track record, and sound and well-developed credit risk management. These positives are counterbalanced by meaningful reliance on wholesale funding, only adequate solvency, and lower business diversification and weaker overall market position than the largest nationwide competitors.

Bankinter's operations are focused on specific market segments where it has a competitive edge thanks to its strong management team, light and flexible operating structure, and superior IT systems. Capitalizing on these strengths, Bankinter's talented management has demonstrated its ability to adapt to changing economic and market conditions. The bank is now gradually increasing the weight of small and midsize enterprise (SME) banking and private banking in its profile, thereby enhancing its business diversification.

Bankinter has a relatively low risk profile, with high-quality residential mortgages accounting for 63% of its total portfolio, and limited market and operational risk. Asset quality indicators have remained significantly better than the market average throughout the economic cycle, as a result of the bank's good credit risk management and systems.

The bank's strong credit expansion, particularly into SMEs, during the past few years—although now decelerating—adds some risk to the balance sheet. Bankinter's sound credit risk management and tight monitoring, good track record in the middle-market segment, and strong reserve cushions, mitigate concerns about this risk. We consequently expect the effect on asset quality of a higher interest rate environment and expected slowing economic growth to be contained.

Operating profitability has benefited from Bankinter's excellent and improving efficiency. This has helped absorb pressure on gross operating returns that have led bottom-line returns to average levels by domestic and international standards. Pressure on operating profitability is nevertheless abating amid a more comfortable interest rate environment and with Bankinter's less aggressive pricing.

Strong loan growth outpacing that of deposits has led Bankinter to rely on wholesale funding, including a substantial proportion of short-term financing in the funding mix. While wholesale funding needs remain manageable, they mean Bankinter has a comparatively higher exposure to trends in short-term (particularly domestic) debt markets.

Core risk-adjusted solvency is just adequate. Our analysis of Bankinter's solvency takes into account the bank's transfer of most of the credit risk associated with securitizations of mortgage loans, which has in turn freed up associated capital. We expect solvency to remain relatively stable, underpinned by slowing growth and the bank's strong capital generation capacity (including excess provisions).

Collateral Description

As of Nov. 10, 2008, the pool comprised 8,664 amortizing mortgage loans and credits secured by first-ranking mortgages over residential owner-occupied, second-home properties in Spain and commercial properties (see table 1).

Table 1

Pool Composition

		(%)
Mortgage credit lines	First-ranking	22.27
Standard mortgage loans	First-ranking	77.73

Of the pool, 22.27% are flexible Hipoteca SIN mortgage credits, which are effectively a flexible credit line; the rest of the pool comprises standard mortgage loans. The main features of the SIN product allow borrowers, with Bankinter's approval in all cases, to make further drawdowns on the mortgage credit, to take payment holidays, and to increase the term of their mortgage credit.

Hipoteca SIN flexible loans: additional draws

Borrowers may draw further on their lines up to the original amount they borrowed at the origination date. The maximum LTV ratio is 80%. The initial and subsequent credit line drawdowns are guaranteed by the underlying property.

The portion of the mortgage credit securitized is the first drawdown made under the credit line. Further drawdowns are treated separately, but rank pari passu with the initial withdrawal.

The maximum amount to be drawn per mortgage credit is the lower of:

- The positive difference between (i) the original drawn amount and (ii) the current amount; and
- The positive difference between (i) the original drawn amount multiplied by twice the percentage that the remaining life represents over the original term and (ii) the current amount.

Hipoteca SIN flexible loans: payment holidays

All the mortgage credits can have payment holidays, but only after the first three years of their life. There is a maximum of three monthly installment holidays (consecutive or not) per year. For every 10 years, there is a maximum of three monthly installment holidays (consecutive or not) distributed across four years.

Pending and accrued interest is paid at once when the payment holiday is finished and principal is re-included in the outstanding balance of the mortgage credit. No mortgage credit in arrears has the option of payment holidays.

Hipoteca SIN flexible loans: increasing the original term of the mortgage credit

The current maximum term of the mortgage credit is established at 35 years. It is possible to increase the term of the mortgage credit at a rate of six months per year that has been paid, excluding the first two years. The installment then has to be recalculated. The term may be extended to a maximum of 40 years. No mortgage credit in arrears has the option to increase the maturity.

Other characteristics of the mortgage credits

Other features of the mortgage pool include:

- Of the pool, 65.81% is concentrated in Valencia, Madrid, Catalonia, and Andalucía (see chart 2).
- The pool was originated between 2003 and 2008. The weighted-average seasoning is 15.99 months, with 31.43% of the pool being originated more than 12.0 months ago (see chart 3).
- The weighted-average LTV ratio is 58.62%, the minimum 4.1%, and the maximum 99.93% (see chart 4).
- In the pool, 1.87% of the loans are not secured by residential properties but by commercial and other type of properties.
- The pool comprises floating-rate mortgage credits that are indexed to one-year EURIBOR. Mortgages in the pool have a weighted-average margin over the floating rate of 37 bps. The weighted-average interest rate is 5.38%. In addition, there are no caps or floors in the pool, and margins can be renegotiated down to a floor of a weighted-average margin of the pool of 30 bps.

Chart 2

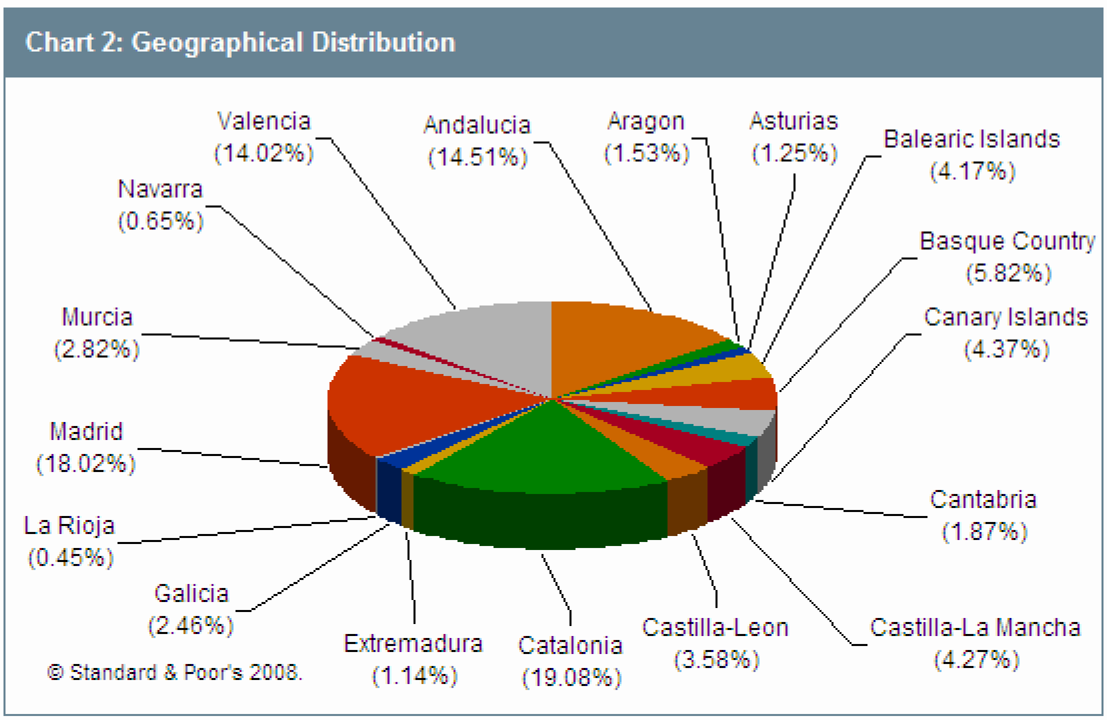


Chart 3

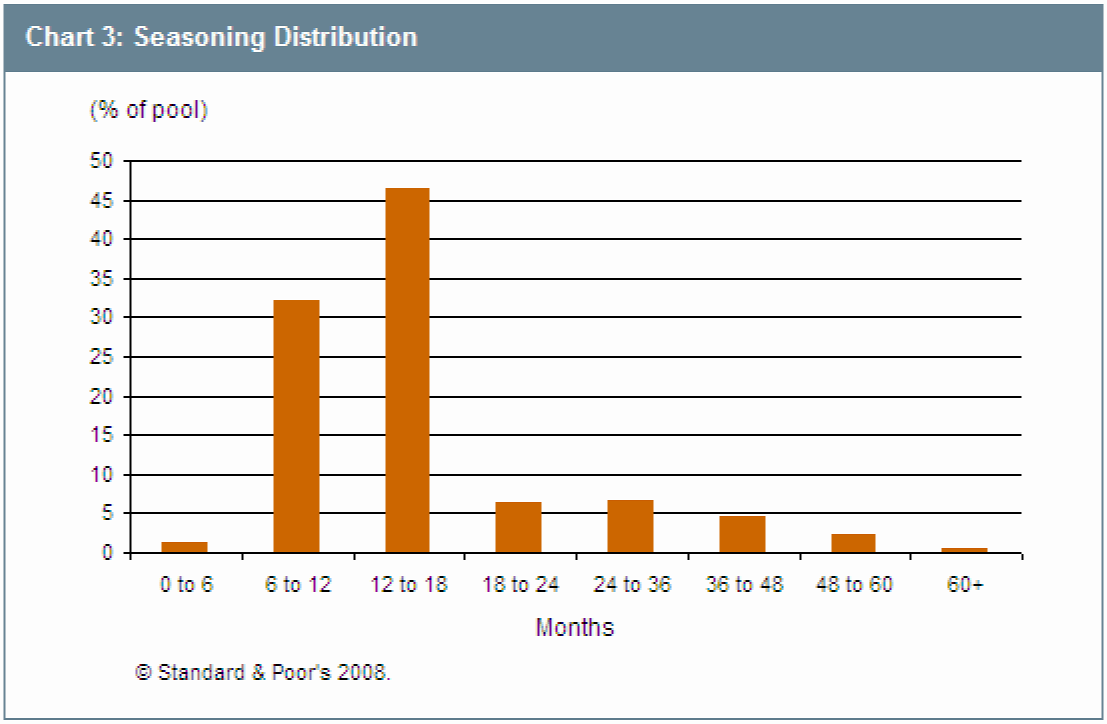
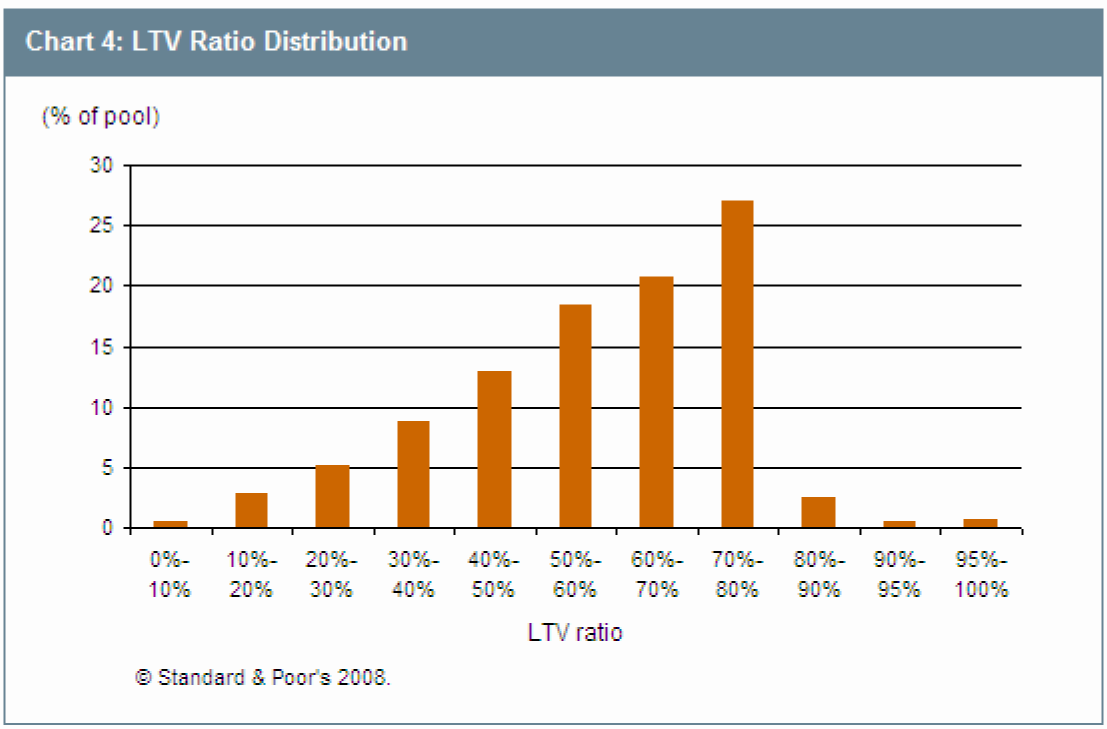


Chart 4



Credit Structure

Credit support for the notes is provided by a combination of subordination, the reserve fund, and excess spread on the mortgages (see table 2).

Table 2

Credit Support For The Notes

Class	Rating	Size of class (%)	Mil. £ (equivalent)	Credit support total (%)	Credit support reserve fund (%)	Credit support subordination (%)
A	AAA	93.65	1.404.7	9.35	3	6.35
B	A	4.35	65.30	5	3	2
C	BBB	2.00	30.0	3	3	—

Cash collection arrangements and transaction account

Funds received at Bankinter due to interest and principal payments of the CTHs are transferred to the treasury account in the name of the fund seven working days after its receipt.

The rest of the amounts, the reserve fund, the guaranteed investment contract (GIC) margins, the subordinated loan for initial expenses, etc., are directly deposited in the treasury account. The treasury account for Bankinter 18 is held at Bankinter. Both have a guaranteed interest rate of three-month EURIBOR.

According to Standard & Poor's "Revised Framework For Applying Counterparty And Supporting Party Criteria" (see "Criteria Referenced"), if the bank account provider is downgraded below 'A-1', it has 60 calendar days until it becomes an ineligible counterparty and it has to:

- Find a replacement with a short-term rating of at least 'A-1', or
- Find an adequate Standard & Poor's guarantor with a short-term rating of at least 'A-1'.

Any counterparty replacement or guarantee is subject to rating confirmation. The downgraded counterparty bears all the costs of the remedies.

Reserve fund

At closing, the reserve fund was fully funded through a subordinated loan. The initial reserve amount represents 3% of the original principal amount of the rated notes. The cash reserve does not amortize for the first three years of the transaction. After the third anniversary of the closing date and on each payment date, the cash reserve account amortizes if the following conditions are met:

- The outstanding balance of the loans in the pool with any payment in arrears for more than 90 days is higher than 1% of the outstanding balance of the loans in the pool;
- The reserve fund is below its required level; or
- The margin of the outstanding balance of the loans is equal to or lower than 30 bps.

Commingling reserve

To protect against commingling risk, if Bankinter is downgraded below a short-term rating of 'A-2', then:

- Within 30 calendar days, the servicer should find an eligible guarantor with a minimum short-term rating of 'A-1'. The guarantor should provide the issuer with a first-demand, unconditional, and irrevocable guarantee

equal to the commingling reserve amount to be applied to pay any amounts the servicer fails to pay the issuer for the loans. This amount, if required to be paid, would be deposited in an issuer bank account in accordance with the bank account and cash management agreements. We would expect to review the guarantee at the time the downgrade occurs; or
- Within 10 calendar days, the servicer should deposit in the issuer's bank account an amount equal to the commingling reserve amount to be applied to pay any amounts the servicer fails to pay the issuer for the loans. Alternatively, we encourage the servicer to request our written confirmation that the ratings on the notes would not be adversely affected.

On the date this commingling reserve is required, the initial amount should be a sufficient proportion of the principal amount outstanding to avoid affecting the rating on the notes.

Priority of payments

On each quarterly interest payment date (IPD), the issuer pays in arrears the interest due to the noteholders. To make the payments, the issuer's available funds include the proceeds of the interest swap, the reserve fund, and, if necessary, principal received under the loans and any other proceeds received in connection with the loans. All interest and principal received can be mixed to pay principal and interest due under the notes in the following order:

- Senior fees (including the administration fee if Bankinter is substituted;
- Termination cost of the swap due to the fund;
- Interest on the class A notes;
- Interest on the class B notes;
- Interest on the class C notes;
- Principal on the notes;
- Interest on the class B notes, if postponed;
- Interest on the class C notes, if postponed;
- Reserve fund replenishment;
- Termination cost of the swap due to the counterparty;
- Interest on the subordinated loan;
- Amortization of the subordinated loan;
- Interest on the start-up loan;
- Amortization of the start-up loan;
- Administration fee if Bankinter is the administrator; and
- The residual margin.

Amortization of the notes

Amortization occurs:

- For the class A notes, from the first payment date until fully amortized;
- For the class B notes, once the class A notes fully amortize; and
- For the class C notes, once the class A and B notes fully redeem.

The available amortization fund on each payment date is equal to the balance of the capital repayment fund. The capital repayment fund, on each payment date, is the difference between:

- The principal outstanding balance under all the series of notes; and

- The principal outstanding balance of all outstanding non-doubtful loans (no more than 18 months in arrears).

The conditions for the pro rata amortization of the class B and C notes are that they amortize pro rata with the class A notes if:

- The ratio of the aggregate balance of delinquent loans to the aggregate balance of non-doubtful loans is below 1.25% for the class B notes and below 1.00% for the class C notes;
- The total outstanding principal balance of the class B and C notes represents at least 8.707% and 4.000% of the outstanding principal balance of all the notes, respectively;
- The cash reserve is at the required amount after the previous payment date; and
- The total outstanding balance of the non-doubtful loan portfolio is equal to or greater than 10% of the initial balance of the loan portfolio.

Interest deferral triggers

The interest on the class B and C notes is subject to a deferral on a given payment date to a lower position in the waterfall:

- Class B note interest is deferred if the cumulative gross default rate, as a percentage over the initial balance of the pool, exceeds 9.77%.
- Class C note interest is deferred if the cumulative gross default rate, as a percentage over the initial balance of the pool, exceeds 7.20%.

Hedging Risk

Interest swap agreement

The interest rate swap agreement mitigates any basis mismatch between the 12-month EURIBOR reference rate of loans in the pool, and the three-month EURIBOR reference rate on the notes. The interest rate swap provider is Bankinter.

On each IPD, the issuer pays the swap counterparty the reference index on the mortgage loans based on a notional amount of the performing principal balance of loans in the pool, plus the balance of all loans less than 18 months in arrears. In return, the issuer receives three-month EURIBOR plus a weighted-average coupon plus 30 bps, all multiplied by the same notional balance.

The minimum rating required to be the swap counterparty is 'A-1', so if Bankinter is downgraded below 'A-1', we would expect Bankinter to take the remedy actions that follow an eligible direct support downgrade, as described in "General: Methodology: Updated Counterparty Criteria For Derivatives: Eligibility Of 'A-2' Counterparties Removed In 'AAA' Transactions" and "Revised Framework For Applying Counterparty And Supporting Party Criteria" (see "Criteria Referenced").

Any counterparty replacement or guarantee is subject to rating confirmation. The downgraded counterparty bears all the costs of the remedies.

Credit Analysis

We stressed the transaction cash flows to test both the credit and liquidity support provided by the assets, subordinated tranches, cash reserve, and any external sources (such as a liquidity facility). We implemented these stresses to the cash flows at all relevant rating levels.

For example, we subject a transaction that incorporates 'AAA', 'A', and 'BBB' rated tranches of notes to three separate sets of cash flow stresses. In the 'AAA' stresses, all 'AAA' notes must pay full and timely principal and interest, but this is not necessarily the case for the 'A' or 'BBB' rated tranches, as they are subordinated in the priority of payments. In the 'A' case, all 'AAA' and 'A' notes must receive full and timely principal and interest, but this is not necessarily so for the 'BBB' rated tranche, as it is subordinated to both 'AAA' and 'A'.

Amount of defaults and recoveries

For each loan in the pool, we estimated the likelihood that the borrower will default on its mortgage payments (the foreclosure frequency), and the amount of loss on the subsequent sale of the property (the loss severity, expressed as a percentage of the outstanding loan).

We assume the total mortgage balance to default. We determine the total amount of this defaulted balance that is not recovered for the entire pool by calculating the weighted-average foreclosure frequency (WAFF) and weighted-average loss severity (WALS).

The WAFF and WALS estimates increase as the required rating level increases, because the higher the rating required on the notes, the higher the level of mortgage default and loss severity they should be capable of withstanding. This credit analysis is based on the characteristics of the loans and the associated borrowers. We have applied market specific criteria in our assessment of the WAFF and the WALS for this portfolio, which are shown in table 3.

Table 3

Portfolio WAFF And WALS

Rating level	WAFF (%)	WALS (%)
AAA	15.40	10.80
A	7.70	4.85
BBB	5.14	3.01

Timing of defaults

The WAFF at each rating level specifies the total balance of the mortgage loans assumed to default over the life of the transaction. We assume that these defaults occur over a three-year recession. Further, we assess the effect of the timing of this recession on the ability to repay the liabilities, and choose the recession start period based on this assessment.

Although the recession normally starts in the first month of the transaction, the 'AAA' recession is usually delayed by 12 months. We apply the WAFF to the principal balance outstanding at the start of the recession (e.g., in a 'AAA' scenario, we apply the WAFF to the balance at the beginning of month 13). We assume defaults occur periodically in amounts calculated as a percentage of the WAFF. The timing of defaults in Spanish transactions follows one path, referred to here as "equal" defaults. This timing is shown in table 4.

Table 4

Timing Of Defaults

Percentage of WAFF	'AAA' (recession month)	Rest of rating scenarios (recession month)
1/3	13	1
1/3	25	13
1/3	37	25

Timing of recoveries

We assume that the issuer would regain any recoveries 30 months after a payment default in Spanish transactions. The value of recoveries at the 'AAA' level is 100% minus the WALS given above.

Note that the WALS used in a cash flow model is always based on principal loss, including costs. We assumed no recovery of any interest accrued on the mortgage loans during the foreclosure period. After the WAFF is applied to the balance of the mortgages, the asset balance is likely to be lower than that of the liabilities (a notable exception is when a transaction relies on overcollateralization). The interest reduction created by the defaulted mortgages during the foreclosure period will need to be covered by other structural mechanisms in the transaction.

Delinquencies

We model the liquidity stress that results from short-term delinquencies, i.e., those mortgages that cease to pay for a period of time but then recover and become current regarding both interest and principal. To simulate the effect of delinquencies, we assume a proportion of interest receipts equal to one-third of the WAFF to be delayed. We apply this in each month of the recession and assume full recovery of delinquent interest will occur 18 months after it is removed from the transaction. Thus, if in month five of the recession the total collateral interest expected to be received is €1 million and the WAFF is 30%, €100,000 of interest (one-third of the WAFF) will be delayed until month 23.

Interest and prepayment rates

We modeled one interest rate scenario—rising—using both high and low prepayment assumptions. Interest rates were 5.5% at the time of modeling and were modeled to rise by 2.0% a month to a high of 12.0% for EURIBOR amounts. In the 'AAA' scenario, the interest rate increase was not modeled to begin until month 13. Also note that we revise interest rate scenarios if there is sufficient evidence to warrant it.

We stress transactions according to two prepayment assumptions, high (24.0%) and low (0.5%). In a 'AAA' scenario, we model a prepayment rate of 10% before the recession for the first year of the transaction for both the high and low prepayment scenarios, to ensure that the WAFF is applied to a consistent asset balance in month 13, when we assume the recession to start in the 'AAA' scenario.

We assume prepayment rates to be static throughout the life of the transaction and apply them monthly to the decreasing mortgage balance. We reserve the right to increase the high prepayment assumption if historical prepayment rates are high or the transaction is particularly sensitive to high prepayments (e.g., the transaction relies heavily on excess spread).

It should be noted that in a 'AAA' scenario we will model an expected prepayment rate of approximately 10% before the recession for the first year of the transaction. We apply this for both the low and high prepayment scenarios to ensure that the WAFF is applied to a consistent asset balance in month 13 (the 'AAA' scenario recession start month).

In combination, the default timings, interest rates, and prepayment rates described above give rise to two different scenarios (see table 5). The ratings we have assigned mean that the notes have all paid timely interest and ultimate principal under each of the scenarios at the proposed rating level.

Table 5

RMBS Stress Scenarios

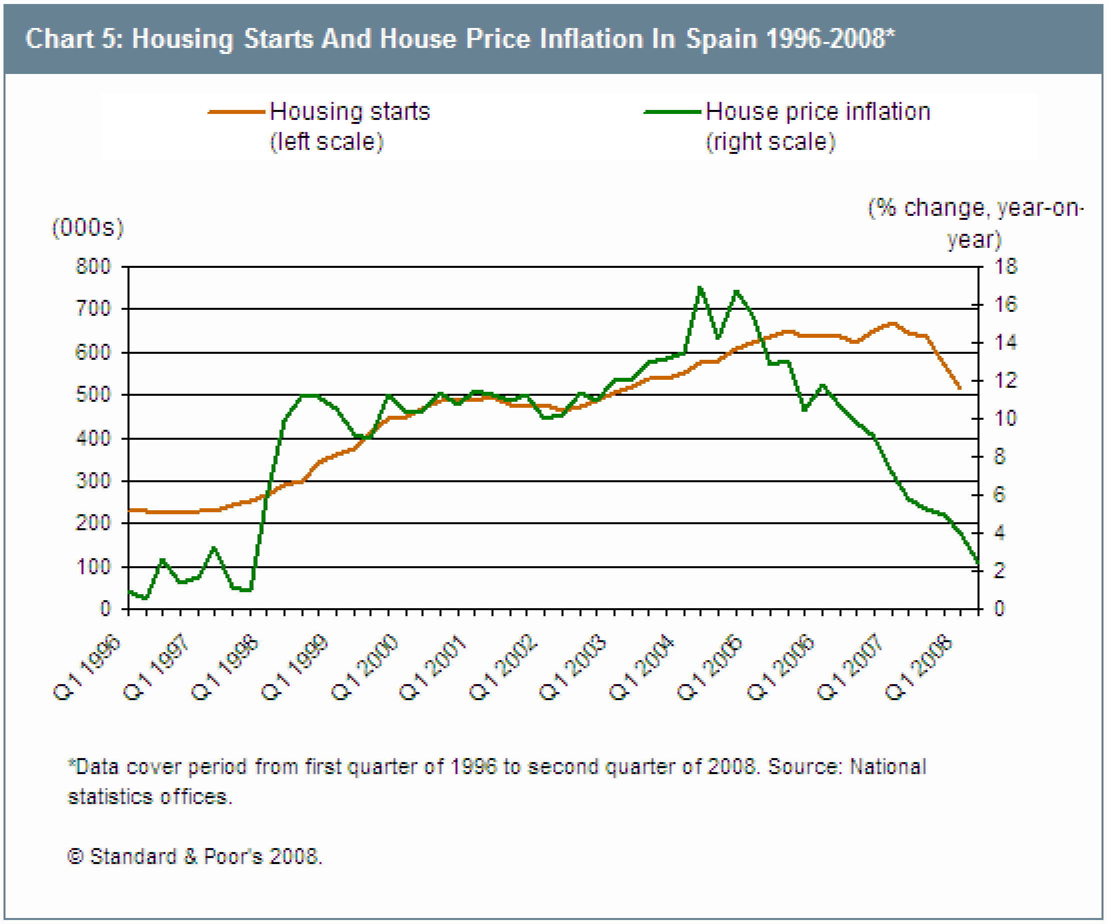
Scenario	Prepayment rate	Interest rate	Default timing
1	Low	Up	Equal
2	High	Up	Equal

Sectoral Credit Highlights

In our May forecast, we warned that the Spanish economy was particularly vulnerable to the ongoing credit crunch given its high dependency on external financing reflected by its very large current account deficit (negative 10% of GDP), the second largest by value after the U.S. (see "European Economic Forecast: Credit Squeeze Threatens The Sustainability Of Spain's Current Account Deficit," published on May 29 on RatingsDirect.) We also explained that the end of abundant and cheap financing of domestic demand by the rest of the world would precipitate the necessary adjustments in Spain's growth model, formally based on rapid growth in corporate and household debt.

Recent developments confirm that the adjustment will be long and painful. Spain's unemployment rate shot up to 10.4% in the second quarter of 2008, from 8.0% a year earlier. Moreover, unemployment in the construction sector rose 70% in the 12 months to May 2008. Yet, that rise is occurring at an early stage of the downturn in construction. Housing starts started to plummet only in the third quarter of last year, albeit at a rapid pace, with a fall of 24% in the first quarter of 2008 compared with a year earlier (see chart 5). Trends in building permits since the middle of 2007 suggest that construction activity will contract more dramatically in the next 12 months. Permits for residential homes dropped 60% year-on-year in the first quarter of 2008, while the demand for cement, a leading indicator of construction activity, fell to its lowest level in 11 years.

Chart 5



The outlook for the construction sector in Spain is made worse by the fact that over the past eight years, housing completions have exceeded the levels required by demographic trends. While the overall population increased by five million between 2000 and 2008, primarily because of large inward migration, house completions averaged over 750,000 each year. As a result, a glut of unsold properties has appeared. Recent estimates point to close on one million of unsold properties across the country, one-half of which are new-build. Adding to that imbalance, the demand for secondary homes from residents in the rest of Europe is drying up. A good proportion of buyers of holiday homes in Spain were British (Britons own more than 500,000 properties in Spain). But the decline in the British pound sterling exchange rate against the euro, higher interest rates, and generally gloomy economic conditions in Britain imply that this support for Spanish property is rapidly diminishing.

In view of those worrying developments, the most recent house price inflation figures (2.4% in the 12 months to June 2008) appear suspiciously benign. The Bank of Spain's recent estimate finds the housing market overvalued by around 30%. The combination of higher interest rates, oversupply of dwellings, and a deteriorating economic climate evidenced by the rise in unemployment all point to a prolonged decline in house prices. In contrast with our projections for the U.K., Spain could experience a more elongated correction, albeit eventually leading to a similar decline in house prices (about 25% peak to trough). Given the size of the construction sector (15% of GDP, employing 2.7 million workers in 2007), the effects of the downturn will be dire. Therefore, we have revised our

GDP forecast down to 0.5% for 2009, from 1.2% in July and 1.6% in our June forecast.

Surveillance

Table 6 shows the main characteristics of the two last Bankinter transactions compared with this one.

Table 6

Transaction Key Features

	Bankinter 18	Bankinter 17	Bankinter 16
Pool features			
Principal outstanding (€)	1,500,000	1,232,487,715.66	2,207,285,247.45
Weighted-average seasoning (months)	15.99	22.7	22.2
Weighted-average LTV ratio (%)	58.62	53.71	62.09
Percentage with LTV ratios below 50%	30.83	39.78	27.68
Percentage with LTV ratios above 80%	3.08	5.1	13.01
Number of loans	8,664	10,052	16,036
Largest (€)	999,095.53	1,575,674.00	4,500,000
Average (€)	173,130	122,611.19	137,645
Weighted-average margin on the floating portfolio* (bps)	35	56	47
Percentage of commercial loans	1.87	6.54	8.63
Percentage of residential loans	98.13	93.46	91.37
Percentage of jumbo loans	2.43	7.94	10.17
Percentage of floating-rate loan	100	100	100
Percentage of fixed-rate loans	—	0	0
Weighted-average foreclosure period (months)	30	30	30
Geographic distribution (%)			
Andalucia	14.06	16.04	15.61
Aragon	1.45	1.53	2.09
Asturias	1.10	1.86	1.51
Balearic Islands	4.04	4.77	4.69
Basque Country	6.16	4.54	4.24
Canary Islands	4.19	5.34	4.65
Cantabria	1.80	2.23	1.38
Castilla-La Mancha	4.23	3.39	4.02
Castilla-Leon	3.65	3.93	2.84
Catalonia	19.89	12.96	17.21
Extremadura	1.15	0.99	0.95
Galicia	2.45	2.40	2.31
La Rioja	0.42	0.52	0.25
Madrid	18.32	17.14	23.47
Murcia	2.82	2.53	1.84
Navarra	0.70	0.51	0.88
Valencia	6.16	19.33	12.05
Others			0

Table 6 (cont.)

Structural features (%)			
AAA	93.65	95.25	94.1
AA	—	—	2.3
A	4.35	3.4	—
A-	—	—	—
BBB	2	1.35	1.9
BB	—	—	1.7
BB-	—	—	—
Cash reserve (%)	3	2.3	2.15
Commingling sized as liquidity loss	NO	NO	YES
Commingling reserve if the administrator is downgraded	YES	YES	NO

*Includes the optional loans that currently pay floating interest rates.

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All criteria and related articles are available on RatingsDirect, the real-time Web-based source for our credit ratings, research, and risk analysis, at www.ratingsdirect.com. The criteria can also be found on our Web site at www.standardandpoors.com.

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