MOODY'S
INVESTORS SERVICE

Rating Action: Moody's downgrades Aaa (sf) ratings on guaranteed notes in 8 Spanish ABS SME

Global Credit Research - 08 Oct 2010

Paris, October 08, 2010 -- Moody's today downgraded to Aa1 (sf) from Aaa (sf) the ratings of eight Spanish ABS SME senior notes guaranteed by the government of Spain. The rating action follows the Spanish government's rating downgrade to Aa1, and the high dependency between Spain and Spanish SMEs that Moody's assumed to determine the benefits of the guarantee to the senior ABS SME notes. A complete list of rating actions by issuer is provided at the end of this press release.

In a related rating action today (see separate press release), Moody's also downgraded the ratings of senior Spanish ABS SME notes guaranteed by the Generalitat de Catalunya (A1).

RATINGS RATIONALE

Moody's approach to rating the guaranteed notes is based on a joint default analysis (JDA), combining (i) the intrinsic credit risk of the senior notes backed by loans to Spanish Small and Medium Size Enterprises (SME)s, irrespective of the guarantee; (ii) the credit risk of the guarantor (Aa1); and (iii) the assumption of a high dependency between the guarantor and the SMEs. Examples of the JDA approach have been provided in Moody's rating methodology "The Application of Joint Default Analysis to Regional and Local Governments", published December 2008.

Moody's assumed a high asset correlation between Spanish SMEs and Spain to assess their joint default probability. Moody's thus concluded that Spanish ABS SME notes guaranteed by Spain could not be rated Aaa (sf) if their underlying credit quality (irrespective of the guarantee) was not consistent with Aaa (sf). None of the affected notes had an intrinsic credit quality consistent with Aaa (sf), so their ratings have been downgraded to Aa1(sf), following Spain's rating downgrade to Aa1.

During its review, Moody's tested a 20% to 40% assumption range for the asset correlation between a default of the average SME obligor in the portfolio backing the ABS transactions and that of the Spanish government. This range of asset correlations was based on the default history of emerging markets countries that were affected by a sovereign crisis (see "Emerging Market Corporate and Sub-Sovereign Defaults and Sovereign Crises: Perspective on Country Risk" published by Moody's in February 2009).

Moody's used simple calculations to test the dependency between a default on a senior ABS SME note and that on its Spanish guarantor. The calculations assumed (i) a perfectly granular portfolio of SME obligors, each with the average default probability of the entire portfolio; and (ii) a credit enhancement below the note that was consistent with its intrinsic credit risk. In these calculations, the expected loss for a guaranteed note is the product of the default probability of Spain (Aa1) and the loss on the senior ABS tranche conditional on a Spanish government default. In this default scenario, Moody's assumed that the average recovery assumption for the pool of SMEs would be approximately halved, compared with the assumption used to determine the intrinsic credit quality of the guaranteed note and the ratings of the non-guaranteed notes.

The principal methodology used in rating the non-guaranteed notes or assessing the intrinsic credit quality of the guaranteed notes were "Refining the ABS SME Approach: Moody's Probability of Default Assumptions in the Rating Analysis of Granular Small and Mid-sized Enterprise Portfolios in EMEA", published in March 2009 and "Moody's Approach to Rating Granular SME Transactions in Europe, Middle East and Africa" published in June 2007. Other methodologies and factors that may have been considered in the process of rating these notes can also be found on Moody's website.

Moody's Investors Service did not receive or take into account a third party due diligence report on the underlying assets or financial instruments related to the monitoring of this transaction in the past 6 months.

Detailed rating actions by issuer

Issuer: AYT FTPYME II Fondo de Titulización de Activos

....EUR90.1M T2 Certificate, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: BBVA-6 FTPYME, Fondo de Titulización de Activos

....EUR215.5M A2(G) Certificate, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: Bankinter 3 FTPYME, Fondo de Titulización de Activos

....EUR91.2M A3 (G) Certificate, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: FTPYME Santander I, Fondo de Titulización de Activos

....EUR537.1M B1(G) Bond, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: FTPYME TDA CAM 4, Fondo de Titulizacion de Activos

....EUR127M A3(CA) Notes, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: GC FTPYME Sabadell 6, Fondo de Titulización de Activos

....EUR134.1M A3(G) Certificate, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: IM Grupo Banco Popular FTPYME I, Fondo de Titulizacion de Activos

....EUR155.4M A5(G) Certificate, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Issuer: RURALPYME 2 FTPYME, FTA

....EUR53.7M A2(G) Notes, Downgraded to Aa1 (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

REGULATORY DISCLOSURES

The rating have been disclosed to the rated entities or their designated agents and issued with no amendment resulting from that disclosure.

Information sources used to prepare the credit rating are the following: parties involved in the ratings, public information, confidential and proprietary Moody's Investors Service information.

Moody's Investors Service considers the quality of information available on the issuer or obligations satisfactory for the purposes of maintaining the credit ratings.

However, the credit rating actions were based on limited historical data on asset correlations between a sovereign state and an ABS tranche backed by corporate borrowers in that sovereign state.

Moody's Investors Service may have provided Ancillary or Other Permissible Service(s) to the rated entities or their related third parties within the three years preceding the Credit Rating Action. Please see the ratings disclosure page www.moodys.com/disclosures on our website for further information.

The lead analyst and rating office for each of the transactions affected is generally different from the contact and office listed at the end of this press release. For each transaction, the lead analyst is available on the issuer page and the rating office on the ratings tab of the issuer on www.moodys.com.

In addition, Moody's publishes a weekly summary of structured finance credit, ratings and methodologies, available to all registered users of our website, at www.moodys.com/SFQuickCheck.

MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process.

Please see ratings tab on the issuer/entity page on Moodys.com for the last rating action and the rating history.

The date on which some Credit Ratings were first released goes back to a time before Moody's Investors Service's Credit Ratings were fully digitized and accurate data may not be available. Consequently, Moody's Investors Service provides a date that it believes is the most reliable and accurate based on the information that is available to it. Please see the ratings disclosure page on our website www.moodys.com for further information.

Please see the Credit Policy page on Moodys.com for the methodologies used in determining ratings, further information on the meaning of each rating category and the definition of default and recovery.

Paris
Ariel Weil
Vice President - Senior Analyst
Structured Finance Group
Moody's France SAS
JOURNALISTS: 44 20 7772 5456
SUBSCRIBERS: 44 20 7772 5454

Paris
Annick Poulain
MD - Structured Finance
Structured Finance Group
Moody's France SAS
JOURNALISTS: 44 20 7772 5456
SUBSCRIBERS: 44 20 7772 5454

Moody's France SAS
96 Boulevard Haussmann
Paris 75008
France