CPR REPORT

Providing the most detailed monthly SBA 7(a) and 504 prepayment, default and market information



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Bob Judge, Government Loan Solutions, Editor



Bob Judge is a partner at Government Loan Solutions.

Government Loan Solutions is a provider of valuation services, prepayment analytics and operational support for the SBA marketplace.

Bob has 30 years of experience in the fixed income markets. He holds a B.A. in Economics from V assar College and an M.B.A. in Finance from NYU Stern School of Business.

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PREPAYS BACK BELOW 8%

In September, prepays moved back below 8% after one month above that benchmark.

A slight increase in the default element (CDR) was more than offset by a decrease in the voluntary prepayment portion (CRR) last month. Defaults rose by 11%, but stayed well below CDR 1% and below CDR 2% for the 25th month in a row. Historically, this reading was the 5th lowest on record.

As for voluntary prepayments, they fell by 10%, moving back

below CRR 7% after one month above that level.

Turning to the details, overall prepayments fell by 8% to

Article continued on page 6, graphs on page 2 & 3 and data on pages 30-32

FMLP OCTOBER UPDATE

In October, we witnessed yet another high CPR print in the FMLP program as refinancing activity continues its torrid pace.

This month, prepayment speeds came in at CPR 33.61%, a slight increase over the CPR 30.36% registered in September.

As for the history of the FMLP, the overall CPR is now 9.56% and rising with each passing

month.

As mentioned in previous months, our thesis that voluntary prepayments are moving higher due to the expiration of underlying prepayment penalties continues to hold true.

With rates looking like they are finally going to rise, we like to follow fixed rate pools especially closely, as a hint to how they perform versus their floating rate brethren. While fixed rates, with a lifetime CPR of 6.14%, are significantly below the overall average, curiously, 3-Month Libor pools are running slower with a lifetime CPR of 5.26%.

It will be interesting to watch and see if that trend holds when rates begin to rise next year.

Continued on page 12

SMALL BUSINESS INDEXES

State of the Secondary Market

Beginning with the Rich/Cheap analysis on page 14, we see that both short and long maturities have begun to rebound from a significant drop in the market that began in May of this year. Both maturity buckets remain in "Cheap" territory, but the trend is pushing them both back towards the Fair Value Band.

For both short and long maturi-

ties, we saw Secondary Market price increases of 0.50% - 1.00% this month. However, we have a long way to go to get back to 2015 near-term highs seen in May.

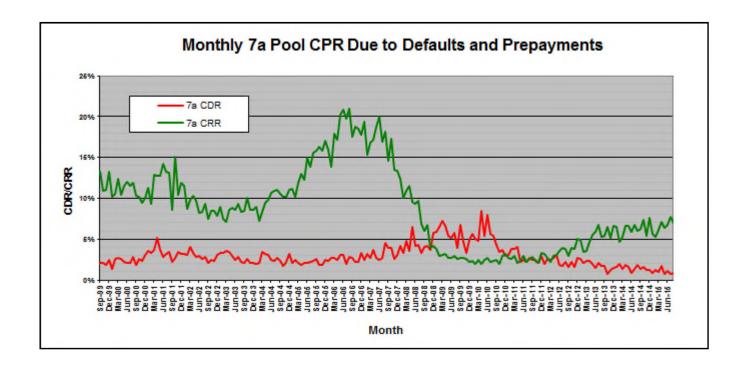
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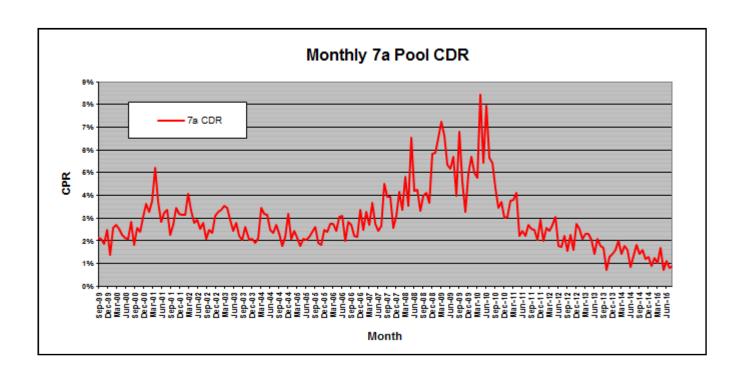
SMALL BUSINESS FACT OF THE MONTH

According to a World Bank report, in New Zealand, using a simple online procedure, it only takes a few hours to set up a new business. By contrast, in Haiti it takes more than 3 months and involves a complex legal process.

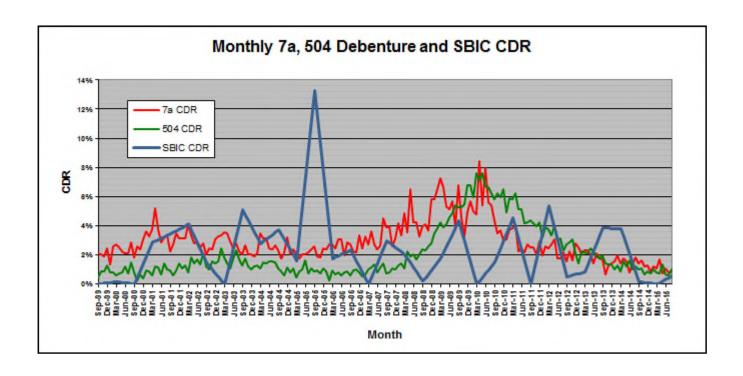
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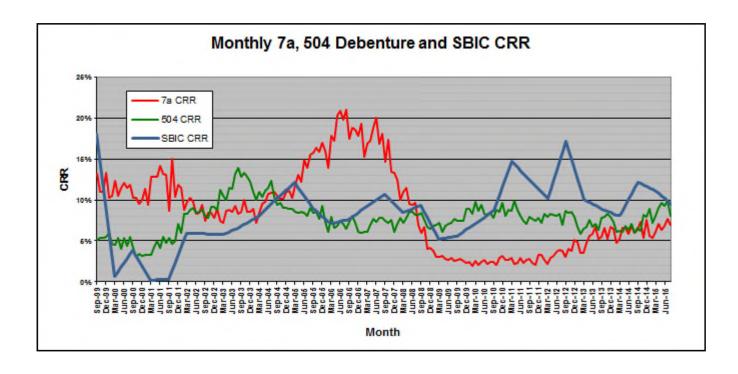
PREPAYMENT SPEEDS...CONTINUED



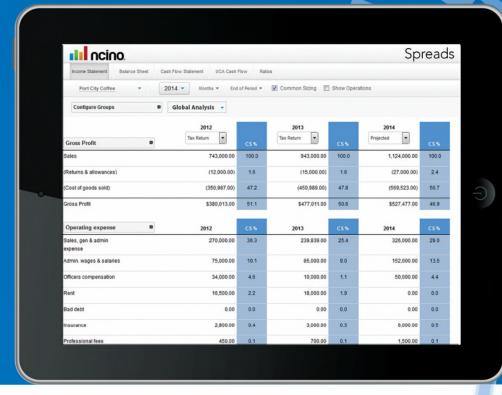


PREPAYMENT SPEEDS...CONTINUED









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Fred Mills

President/CEO 877-774-4240 x101 fred@blclending.com

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PREPAYMENT SPEEDS...CONTINUED

7.81% from 8.52% the previous month.

In comparing YOY prepayment speeds for this year versus last year, we see that 2015 is currently 0.6% higher than 2014, CPR 7.69% versus CPR 7.64%. As for the largest sector of the market, 20+ years to maturity, prepayment speeds fell by 6% to 8.11% from 8.66%.

Turning to the CPR breakdown, the CDR increased by 11% to 0.88% while the CRR fell by 10% to 6.94%.

Preliminary data for next month suggests that prepayments will move back above 8% as we move closer to the end of 2015.

Regarding our maturity buckets, prepayment speeds fell in all six categories.

Decreases were seen, by order of magnitude, in the 13-16 year sector (-37% to CPR 2.84%), 16-20 (-26% to CPR 7.20%), <8 (-17% to CPR 7.38%), 8-10 (-9% to CPR 9.73%), 10-13 (-8% to CPR 7.28%) and 20+ (-6% to CPR 8.11%).

While this month provided a break from 8%+ prepayment speeds, expect them to become commonplace as voluntary prepayments continue to trend higher.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report. "While this month
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higher."

Data on pages 30-32

INVITATION FOR SBA SECONDARY MARKET STAKEHOLDERS

New strategies for capitalizing on emerging SBA secondary market opportunities and avoiding the pitfalls



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Summit Venue: Swedish Embassy, Georgetown, One Day: Tuesday, December 1, 2015 Embassy of Sweden 2900 K Street NW, Washington, DC



SBA

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For more details, go to www.colemanreport.com



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Thomas USAF Group is now offering Banks the opportunity to sell their a) 504 first mortgages b) unguaranteed portions of USDA loans or c) other conventional loans to "Essential Rural Businesses" and Businesses catering to the "Agricultural Sector." This is a Nationwide program for Existing Businesses. USDA's definition of Rural shall determine eligibility.

Targeted Rural Businesses must be <u>Essential to Rural Communities</u>. Examples include a) Health Care b) Eldercare c) Housing d) Community Facilities

Businesses Catering to or Involved in the Agriculture Sector can be located in either rural or urban areas. Examples of Businesses Involved in or Catering to Agriculture Sector include a) Agriculture Production b) Agriculture Manufacturing c) Animal Healthcare, Production and Distribution of Ag products d) Businesses Utilizing Ag Products or otherwise catering to Ag Sector







Premiums Paid: Depending on rate, term, collateral, reset frequency and prepayment penalty, etc.

<u>Debt Service Coverage</u>: Loans must demonstrate a consistent minimum global DSC of 1.20x

<u>Term</u>: 20-25 years with up to a 30 year Amortization—depending on economic life of collateral

<u>General Rates</u>: Rates as low as 5% can be structured flexibly—ranging from quarterly adjust to adjusting every 1,3,5,7,10 or 15 years. Fixed rate options available

<u>Loan Size</u>: Preferred Loan Size is \$5,000,000 and up. Minimum Loan Size: \$ 2,500,000

Loan to Value: Up to 90% on SBA 504 loans and typically up to 75% on conventional loans

<u>Strong Prepayment Penalty</u> as is customary in 504 debentures preferred; minimum 5% flat for 5 years <u>Exclusions:</u> Rural Businesses generally excluded from this program: Hospitality, Restaurants, Gas stations, Car

Washes, Start-ups and Turnarounds, Faith-based projects, Big Box businesses and projects involving

Environmental Sensitivity. Borrowers involved in Agriculture may qualify for exceptions

<u>Customer Relationships</u>: Lenders can continue to maintain the customer relationships

Secondary Market Takeout: TUSAF can purchase up to 100% of the loan through table funding Advantages of the Program: Ability to sell obviates the need to balance sheet the loan mitigating capital requirements. In addition to recycling liquidity, Lenders can make premium income, whilst retaining client and depositary relationship. Additional product line offering to customers. Could solve legal lending limit and concentration issues. Table Funding Option available



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SBA 7(a) Secondary Mkt.
Presented by Bob Judge

- · Learn basics of market & how to attract loan bids;
- . Best loan structures & who makes market;
- · How to settle loan sales & required accounting;
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More info, go to SBFI.org/Lender-Training/SBA-Lender-Training/



504 1st Mtg. Secondary Mkt. Presented by Jordan Blanchard

- Learn basics of 504 & how grow loan volume;
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- · Secondary market options to grow loan volume;
- · Different sale options and buyer types.

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FIXED RATE PREPAYMENT SPEEDS

			Floating Bal-	Floating	
CPR/MO	Fixed Balance	Fixed CPR	ance	CPR	Diff
Aug-13	\$179,051,066	0.19%	\$20,253,432,436	8.83%	-8.63%
Sep-13	\$177,857,935	15.32%	\$20,336,071,871	7.01%	8.31%
Oct-13	\$182,039,455	9.09%	\$20,587,575,276	7.11%	1.98%
Nov-13	\$182,306,659	15.74%	\$20,538,221,052	7.23%	8.51%
Dec-13	\$180,295,921	8.93%	\$20,729,799,282	6.50%	2.43%
Jan-14	\$177,733,178	12.38%	\$21,022,306,031	8.09%	4.29%
Feb-14	\$176,575,556	3.76%	\$21,093,215,494	8.10%	-4.34%
Mar-14	\$175,789,793	1.31%	\$21,373,131,940	6.70%	-5.39%
Apr-14	\$172,071,630	18.77%	\$21,493,632,332	6.65%	12.11%
May-14	\$170,784,401	4.81%	\$21,718,091,815	8.38%	-3.56%
Jun-14	\$168,722,262	9.95%	\$21,940,929,504	8.19%	1.76%
Jul-14	\$176,381,998	4.95%	\$22,167,851,490	6.72%	-1.76%
Aug-14	\$175,501,952	1.92%	\$22,329,187,134	8.14%	-6.22%
Sep-14	\$174,605,525	2.03%	\$22,331,731,520	7.79%	-5.76%
Oct-14	\$171,898,957	13.61%	\$22,696,773,809	7.69%	5.92%
Nov-14	\$170,143,254	7.83%	\$23,025,776,709	8.96%	-1.13%
Dec-14	\$168,298,998	8.54%	\$23,131,042,503	6.56%	1.98%
Jan-15	\$172,191,567	6.94%	\$23,312,668,517	8.85%	-1.91%
Feb-15	\$171,432,354	1.12%	\$23,724,444,352	6.48%	-5.36%
Mar-15	\$168,769,006	13.57%	\$24,075,928,509	6.58%	6.99%
Apr-15	\$167,166,677	6.98%	\$24,203,932,892	7.18%	-0.20%
May-15	\$179,743,052	1.06%	\$24,394,038,956	8.78%	-7.72%
Jun-15	\$176,678,991	15.25%	\$24,508,300,893	7.06%	8.19%
Jul-15	\$174,747,030	8.68%	\$24,649,191,221	7.90%	0.78%
Aug-15	\$191,399,575	13.83%	\$24,662,117,205	8.52%	5.31%
Sep-15	\$190,363,888	2.40%	\$25,018,538,680	7.81%	-5.42%

In September, fixed rate pools came in with a prepay speed of CPR 2.40%, significantly below the floating rate speed of 7.81%. This marks the first time in four months that fixed rates came in below floating rate pools.

There were no new fixed rate pools issued last month.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report.



SBIC DEBENTURE PREPAYMENT SPEEDS

Historical SBIC Defaults and Voluntary Prepayments, 1999 to Present

SBIC DEB SBIC DEB SBIC DEB SBIC DEB **AMORT** MONTH CDR CRR CPR **EQUIV CPR** 3/1/2000 0.17% 0.63% 0.79% -11.34% 9/1/2000 0.00% 3.89% 3.89% -6.40% 3/1/2001 2.89% 0.20% 3.08% -7.56% 9/1/2001 3.47% 0.28% 3.74% -5.41% 3/1/2002 4.14% 6.03% 10.04% 0.13% 9/1/2002 1.47% 5.94% 7.37% -3.09% 3/1/2003 0.00% 5.81% 5.81% -3.70% 9/1/2003 5.13% 6.84% 11.79% 2.60% 3/1/2004 2.79% 8.11% 10.78% 0.24% 9/1/2004 3.74% 10.37% 13.92% 3.82% 3/1/2005 1.63% 12.43% 13.95% 3.83% 9/1/2005 13.67% 9.19% 22.19% 13.21% 3/1/2006 1.76% 7.18% 8.88% -1.77% 9/1/2006 2.34% 7.75% 10.00% 0.13% 3/1/2007 0.00% 9.39% 9.39% -0.40% 9/1/2007 2.99% 10.91% 13.73% 3.57% 3/1/2008 2.04% 8.57% 10.53% 0.52% 9/1/2008 0.19% 9.53% 9.71% -1.12% 3/1/2009 1.79% 5.23% 6.97% -3.65% 9/1/2009 4.36% 5.64% 9.87% -1.02% 3/1/2010 0.00% 7.22% 7.22% -4.32% 9/1/2010 1.50% 8.87% 10.30% -1.09% 15.21% 3/1/2011 4.51% 19.36% 9.14% 2.32% 9/1/2011 0.00% 12.66% 12.66% 3/1/2012 5.45% 10.39% 15.55% 5.42% 9/1/2012 0.50% 17.80% 18.26% 8.37% 3/1/2013 0.84% 10.28% 11.08% 1.75% 9/1/2013 3.89% 9.07% 12.78% 2.70% 3/1/2014 3.82% 8.10% 11.76% 1.45% 9/1/2014 0.16% 12.17% 12.33% 1.76% 3/1/2015 0.00% 11.09% 11.09% 0.26% 9.81% 9/1/2015 0.67% 9.17% -0.72%

SBIC Defaults and Voluntary Prepayments by Debenture Age

SBIC DEB AGE	SBIC CDR	SBIC CRR	SBIC CPR	AMORT EQUIV CPR
0	0.00%	0.00%	0.00%	0.00%
6	0.40%	1.20%	1.60%	-7.10%
12	0.36%	1.57%	1.93%	-7.26%
18	0.37%	3.23%	3.59%	-6.04%
24	1.32%	3.27%	4.57%	-5.64%
30	2.26%	8.08%	10.24%	-0.11%
36	1.72%	8.28%	9.93%	-1.22%
42	1.61%	12.41%	13.91%	2.39%
48	2.18%	13.92%	15.94%	3.65%
54	3.83%	15.57%	19.08%	6.04%
60	3.81%	22.64%	25.99%	12.72%
66	4.80%	34.86%	38.72%	26.38%
72	4.89%	28.92%	33.03%	17.61%
78	5.34%	26.95%	31.51%	13.06%
84	7.07%	22.50%	28.71%	5.81%
90	3.94%	18.49%	22.04%	-8.84%
96	12.39%	30.83%	41.07%	10.88%
102	9.12%	26.38%	34.17%	-12.74%
108	12.15%	36.64%	46.23%	-15.76%
114	19.83%	36.69%	52.25%	-79.78%
120	22.92%	0.00%	22.92%	0.00%

calculation, we see that prepays actually fell into negative territory, coming in at AECPR –0.72%. This is also the first time we have seen a negative print since 2010.

Turning to the components, defaults came in at 0.67% CDR from CDR 0.00% in March. As for the un-amortized CRR, we saw it decrease to CRR 9.17% from CRR 11.09%.

As in the 7a and 504 programs, low defaults continue to impress in the SBIC program.

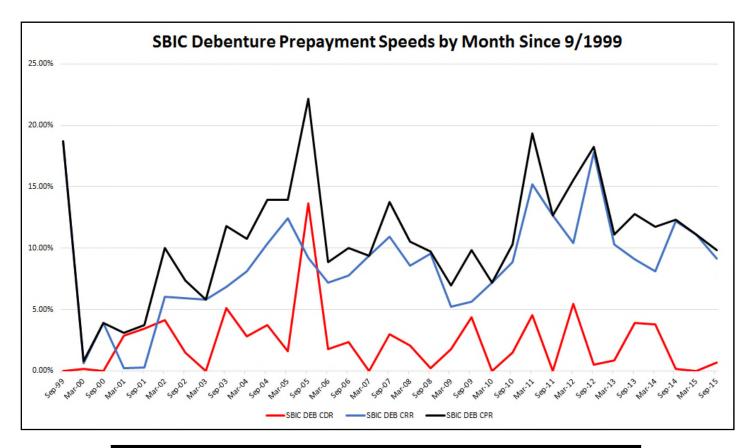
See you in March 2016 with another update.

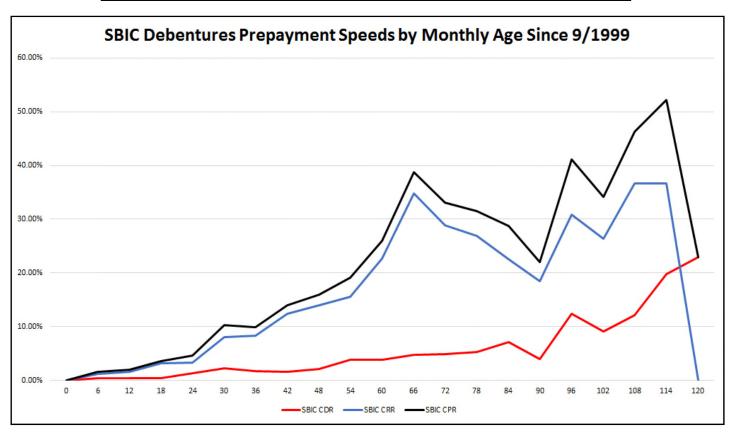
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Reprint from last month:

For September, we saw overall CPRs fall below CPR 10% for the first time since 2010, dropping to CPR 9.81%. Once we correct for amortization using our Amortization Equivalent CPR (AECPR)

SBIC DEBENTURE PREPAYMENT SPEEDS





FMLP LIFETIME PREPAYMENT SPEEDS

MO / WAM BUCKET	<192 Mos.	192-263 Mos.	264-288 Mos.	289+ Mos.	Total by Month
May-11	0.00%	0.00%	11.49%	3.49%	9.28%
Jun-11	1.04%	0.00%	0.00%	0.00%	0.06%
Jul-11	0.00%	0.00%	0.00%	0.00%	0.00%
Aug-11	0.00%	0.00%	0.00%	0.13%	0.03%
Sep-11	0.00%	0.00%	0.00%	0.00%	0.00%
Oct-11	0.00%	0.00%	16.15%	0.09%	10.31%
Nov-11	0.00%	0.00%	15.67%	0.00%	9.78%
Dec-11	0.00%	0.44%	0.00%	0.00%	0.05%
Jan-12	0.00%	0.00%	23.69%	5.71%	13.10%
Feb-12	0.00%	0.00%	0.04%	0.00%	0.02%
Mar-12	0.00%	0.00%	0.04%	0.01%	0.02%
Apr-12	0.00%	0.00%	0.00%	2.11%	0.74%
May-12	0.00%	9.99%	0.00%	2.48%	2.46%
Jun-12	0.00%	0.00%	0.01%	0.00%	0.00%
Jul-12	0.00%	24.60%	0.00%	0.00%	3.21%
Aug-12	0.00%	0.00%	0.17%	0.00%	0.04%
Sep-12	0.00%	0.05%	0.00%	11.52%	4.68%
Oct-12	0.00%	0.00%	0.00%	0.08%	0.03%
Nov-12	0.13%	0.71%	0.00%	1.86%	0.81%
Dec-12	0.00%	0.00%	0.04%	4.05%	1.47%
Jan-13	0.00%	6.04%	12.31%	12.61%	9.08%
Feb-13	0.00%	0.00%	0.00%	0.94%	0.33%
Mar-13	0.00%	0.00%	0.00%	0.94%	0.34%
Apr-13	15.27%	0.00%	0.00%	0.36%	3.32%
May-13	0.00%	0.00%	0.00%	0.01%	0.00%
Jun-13	0.00%	0.00%	0.02%	4.98%	1.81%
Jul-13	0.00%	0.00%	13.73%	0.00%	4.06%
Aug-13	15.17%	0.00%	0.00%	0.04%	3.17%
Sep-13	2.00%	0.00%	10.18%	5.13%	5.11%
Oct-13	0.00%	0.00%	1.73%	2.79%	1.48%
Nov-13	11.38%	0.65%	0.03%	0.00%	2.45%
Dec-13	0.00%	0.00%	0.00%	0.00%	0.00%
Jan-14	0.00%	0.00%	23.25%	0.34%	7.15%
Feb-14	0.00%	0.00%	0.00%	11.79%	4.37%
Mar-14	0.00%	0.00%	0.00%	0.02%	0.01%
Apr-14	26.98%	0.00%	0.00%	0.01%	5.85%
May-14	0.00%	0.00%	0.00%	0.00%	0.00%
Jun-14	0.00%	16.22%	0.00%	3.11%	4.13%
Jul-14	0.00%	43.09%	0.01%	14.12%	14.01%
Aug-14	13.51%	14.49%	16.95%	32.33%	21.85%
Sep-14	22.37%	34.17%	21.61%	19.37%	23.23%
Oct-14	20.24%	40.03%	1.57%	0.95%	12.70%
Nov-14	0.00%	25.65%	40.96%	1.62%	18.11%
Dec-14	0.00%	0.00%	0.01%	3.03%	1.12%
Jan-15	54.68%	59.57%	37.47%	1.73%	35.18%
Feb-15	7.78%	50.12%	50.09%	5.58%	28.40%
Mar-15	0.01%	5.74%	0.01%	5.32%	2.93%
Apr-15	0.00%	11.14%	13.11%	0.00%	5.41%
May-15	52.05%	0.00%	0.00%	38.53%	28.06%
Jun-15	0.00%	0.00%	38.85%	39.94%	27.95%
Jul-15	33.52%	0.00%	42.36%	15.56%	25.42%
Aug-15	68.24%	1.86%	36.06%	54.50%	47.21%
Sep-15	52.59%	34.37%	25.55%	17.83%	30.36%
Oct-15	70.19%	0.00%	37.60%	14.78%	33.61%
Total	12.31%	9.30%	9.82%	7.97%	9.56%

RESET TYPE	FIXED RATE	FHLB VARIOUS	PRIME RATE	5 YR LIBOR SWAP	3 MO LIBOR	5 YR CMT	Total by Month
May-11	34.52%	0.00%	0.00%	1.88%	0.00%	0.00%	9.28%
Jun-11	0.00%	0.00%	0.15%	0.00%	0.00%	0.00%	0.06%
Jul-11	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Aug-11	0.00%	0.00%	0.06%	0.00%	0.00%	0.00%	0.03%
Sep-11	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Oct-11	0.00%	0.00%	0.00%	27.93%	0.00%	0.00%	10.31%
Nov-11	0.00%	0.00%	0.00%	27.92%	0.00%	0.00%	9.78%
Dec-11	0.00%	0.00%	0.00%	0.15%	0.00%	0.00%	0.05%
Jan-12	0.00%	1.24%	21.92%	5.42%	0.00%	0.00%	13.10%
Feb-12	0.00%	0.42%	0.00%	0.00%	0.03%	0.00%	0.02%
Mar-12	0.00%	0.42%	0.01%	0.00%	0.03%	0.00%	0.02%
Apr-12	0.00%	0.00%	0.00%	2.21%	0.02%	0.00%	0.74%
May-12	0.00%	0.00%	0.00%	7.33%	0.00%	0.00%	2.46%
Jun-12	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Jul-12	0.00%	0.00%	0.00%	9.02%	0.00%	0.00%	3.21%
Aug-12	0.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%
Sep-12	0.01%	0.00%	0.00%	11.95%	0.00%	0.00%	4.68%
Oct-12 Nov-12	0.00%	0.00%	0.00%	0.08% 2.24%	0.00%	0.00%	0.03%
Dec-12	0.00%	0.00%	0.00%	4.03%	0.00%	0.00%	1.47%
Jan-13	0.00%	0.00%	10.35%	12.55%	0.00%	0.00%	9.08%
Feb-13	0.00%	0.00%	0.00%	0.94%	0.00%	0.00%	0.33%
Mar-13	0.00%	0.00%	0.00%	0.94%	0.00%	0.00%	0.34%
Apr-13	0.00%	0.00%	0.00%	0.36%	0.00%	59.93%	3.32%
May-13	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%
Jun-13	0.00%	0.00%	0.00%	4.96%	0.08%	0.00%	1.81%
Jul-13	0.00%	0.00%	8.67%	0.57%	0.00%	0.00%	4.06%
Aug-13	0.00%	0.00%	3.79%	0.04%	0.00%	36.39%	3.17%
Sep-13	0.06%	0.00%	3.90%	0.00%	2.63%	65.01%	5.11%
Oct-13	4.04%	0.00%	0.01%	2.86%	0.00%	0.00%	1.48%
Nov-13	0.00%	0.00%	3.90%	0.33%	0.00%	18.22%	2.45%
Dec-13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Jan-14	1.04%	0.00%	15.42%	0.02%	0.00%	0.00%	7.15%
Feb-14	0.00%	0.00%	0.00%	11.70%	0.00%	0.00%	4.37%
Mar-14	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
Apr-14	0.03%	0.00%	11.39%	0.00%	0.00%	21.57%	5.85%
May-14	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Jun-14	0.00%	0.00%	6.90%	3.13%	0.00%	0.00%	4.13%
Jul-14	0.00%	0.00%	0.00%	34.33%	0.00%	0.00%	14.01%
Aug-14	0.00%	0.00%	32.70%	12.40%	0.00%	60.52%	21.85%
Sep-14	0.00%	0.00%	29.00%	19.73%	0.13%	73.35%	23.23%
Oct-14	3.74%	0.00%	25.93%	0.96%	0.00%	0.00%	12.70%
Nov-14	52.67%	0.00%	23.54%	0.35%	0.00%	0.00%	18.11%
Dec-14	0.00%	0.00%	0.00%	0.00%	17.58%	0.00%	1.12%
Jan-15	3.32%	0.00%	51.58%	28.24%	8.45%	0.00%	35.18%
Feb-15	10.32%	0.00%	46.86%	14.88%	2.67%	0.00%	28.40%
Mar-15	0.07%	0.00%	2.15%	2.10%	19.26%	0.07%	2.93%
Apr-15	0.00%	0.00%	10.86%	2.36%	0.00%	0.00%	5.41%
May-15	0.00%	0.00%	34.21%	27.99%	34.04%	35.84%	28.06%
Jun-15	49.34%	0.00%	12.42%	40.66%	0.01%	0.00%	27.95%
Jul-15	16.44%	92.73%	25.50%	17.79%	12.92%	61.03%	25.42%
Aug-15	58.30%	0.00%	44.87%	47.00%	62.41%	0.00%	47.21%
Sep-15	0.00%	0.00%	33.65%	31.83%	37.19%	57.45%	30.36%
Oct-15	29.06%	0.00%	36.28%	36.71%	0.00%	41.23%	33.61%
Total	6.14%	4.27%	10.93%	9.23%	5.26%	16.59%	9.56%

SBI Index Results

This month saw increases over the one-month time horizon for 7a pools and 7a IO Strips, but decreases in SBAPs, SBICs and the Composite.

SBA 7a pools returned +0.41% for actual and +0.40% for equal weighting this month versus -0.60% / -0.60% last month as the Secondary Market moved higher.

For IO Strips, we witnessed positive returns of $\pm 2.41\% / \pm 3.23\%$, up from returns of -8.72% / -9.11% last month. As the most sensitive asset class to movements in the 7a Secondary Market, movements in price can have an outsized impact on these indexes.

Turning to our SBAP and SBIC indexes, we saw the 504 debenture indexes decrease by -0.77% / -0.66% and the SBIC debenture indexes fall by -0.73% / -0.76% this month.

Overall, our Composite Index came in at -0.24% / -0.17% as losses in SBAPs and SBICs overcame gains in 7a Pools and IO Strips.

If you wish to further delve into the SBI Indexes, please visit our website at www.sbindexes.com. Registration is currently free and it contains a host of information relating to these indexes, as well as indexing in general.

For further information on the SBI Indexes, please refer to the "Glossary and Definitions" at the end of the report.

Data and Charts begin on the next page



Through the joint venture of Ryan ALM, Inc. and GLS, both companies have brought their unique capabilities together to cre-Indexes, LLC. ate the tirst rotal kerum mackes to carry. Interest-Only Strips, with a history going back to January 1st, ate the first Total Return Indexes for SBA 7(a) Pools and SBA 7(a)

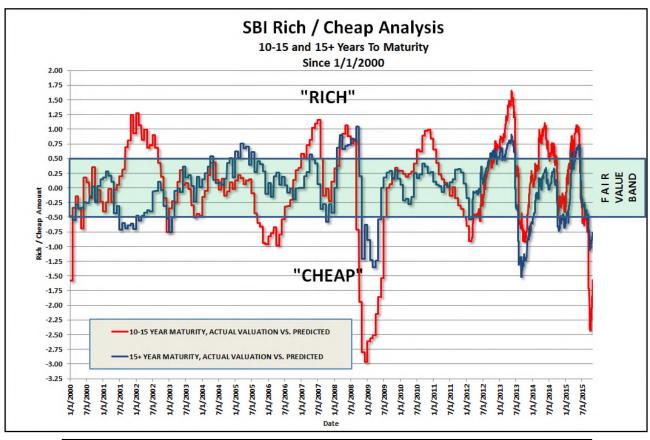
Using the "Ryan Rules" for index creation, the SBI indexes represent best practices in both structure and transparency.

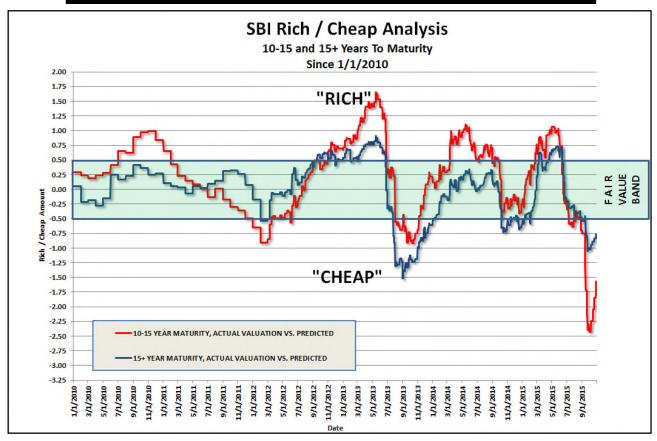
Principals:

Ronald J. Ryan, CFA, Founder and CEO of Ryan ALM, Inc. Ron has a long history of designing bond indexes, starting at Lehman Brothers, where he designed most of the popular Lehman bond indexes. Over his distinguished career, Ron and his team have designed hundreds of bond indexes and ETFs.

Bob Judge, Partner, GLS. Bob, a recognized expert in the valuation of SBA-related assets as well as the SBA Secondary Market and is the editor of the CPR Report, a widely-read monthly publication that tracks SBA loan defaults, prepayment and secondary market activity.

For more information, please visit our website: www.SBIndexes.com





END DATE: 10/31/2015			SBIPC	OL INDEX	TOTAL RE	TURN		
INDEX TYPE	1 MONTH	3 MONTH	6 MONTH	1 YEAR	3 YEAR	5 YEAR	10 YEAR	INCEPTION
POOL, ALL EQUAL INDEX	0.40%	(0.15%)	(0.84%)	0.66%	2.88%	14.91%	68.25%	121.77%
POOL, ALL ACTUAL INDEX	0.41%	(0.16%)	(0.88%)	0.69%	2.94%	11.56%	49.24%	96.18%
POOL, LONG EQUAL INDEX	0.29%	(0.03%)	(0.60%)	0.86%	3.30%	17.33%	80.15%	138.02%
POOL, LONG ACTUAL INDEX	0.27%	(0.03%)	(0.62%)	0.90%	3.36%	13.05%	55.76%	105.16%
POOL, SHORT EQUAL INDEX	0.78%	(0.54%)	(1.60%)	0.03%	1.65%	8.98%	41.98%	84.56%
POOL, SHORT ACTUAL INDEX	0.86%	(0.60%)	(1.75%)	(0.02%)	1.67%	7.83%	35.21%	75.67%
POOL, ALL EQUAL INCOME INDEX	0.21%	0.63%	1.27%	2.53%	7.76%	20.46%	85.97%	153.18%
POOL, ALL ACTUAL INCOME INDEX	0.22%	0.64%	1.28%	2.56%	7.95%	16.97%	64.63%	122.67%
POOL, LONG EQUAL INCOME INDEX	0.19%	0.57%	1.13%	2.27%	6.98%	20.89%	94.21%	164.08%
POOL, LONG ACTUAL INCOME INDEX	0.19%	0.57%	1.14%	2.30%	7.17%	16.49%	67.37%	126.02%
POOL, SHORT EQUAL INCOME INDEX	0.29%	0.85%	1.70%	3.37%	10.20%	19.98%	67.99%	131.68%
POOL, SHORT ACTUAL INCOME INDEX	0.30%	0.88%	1.74%	3.46%	10.49%	18.88%	60.12%	119.82%
POOL, ALL EQUAL PRICE INDEX	0.27%	(0.51%)	(1.53%)	(0.74%)	(1.53%)	(0.40%)	(1.76%)	(0.68%)
POOL, ALL ACTUAL PRICE INDEX	0.27%	(0.52%)	(1.57%)	(0.72%)	(1.58%)	(0.36%)	(1.75%)	(0.71%)
POOL, LONG EQUAL PRICE INDEX	0.17%	(0.35%)	(1.23%)	(0.42%)	(0.88%)	0.47%	(0.77%)	0.42%
POOL, LONG ACTUAL PRICE INDEX	0.15%	(0.34%)	(1.23%)	(0.38%)	(0.94%)	0.48%	(0.77%)	0.39%
POOL, SHORT EQUAL PRICE INDEX	0.59%	(1.03%)	(2.50%)	(1.75%)	(3.50%)	(2.86%)	(4.44%)	(4.19%)
POOL, SHORT ACTUAL PRICE INDEX	0.66%	(1.11%)	(2.67%)	(1.83%)	(3.57%)	(2.82%)	(4.45%)	(4.25%)
POOL, ALL EQUAL PREPAY INDEX	(0.05%)	(0.18%)	(0.36%)	(0.71%)	(1.92%)	(2.51%)	(5.58%)	(8.83%)
POOL, ALL ACTUAL PREPAY INDEX	(0.05%)	(0.19%)	(0.39%)	(0.74%)	(1.99%)	(2.56%)	(5.42%)	(8.36%)
POOL, LONG EQUAL PREPAY INDEX	(0.05%)	(0.19%)	(0.36%)	(0.70%)	(1.82%)	(2.28%)	(5.11%)	(8.30%)
POOL, LONG ACTUAL PREPAY INDEX	(0.06%)	(0.19%)	(0.39%)	(0.73%)	(1.88%)	(2.31%)	(4.85%)	(7.73%)
POOL, SHORT EQUAL PREPAY INDEX	(0.05%)	(0.17%)	(0.37%)	(0.74%)	(2.20%)	(3.13%)	(6.68%)	(10.36%)
POOL, SHORT ACTUAL PREPAY INDEX	(0.05%)	(0.18%)	(0.40%)	(0.78%)	(2.32%)	(3.24%)	(6.76%)	(10.10%)
POOL, ALL EQUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.11%)	(0.41%)	(0.70%)	(1.37%)	(2.07%)
POOL, ALL ACTUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.11%)	(0.42%)	(0.71%)	(1.34%)	(1.97%)
POOL, LONG EQUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.10%)	(0.38%)	(0.61%)	(1.13%)	(1.81%)
POOL, LONG ACTUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.11%)	(0.39%)	(0.61%)	(1.07%)	(1.69%)
POOL, SHORT EQUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.11%)	(0.49%)	(0.95%)	(1.93%)	(2.74%)
POOL, SHORT ACTUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.05%)	(0.12%)	(0.51%)	(0.97%)	(1.96%)	(2.70%)
POOL, ALL EQUAL VOL PREPAY INDEX	(0.04%)	(0.16%)	(0.32%)	(0.60%)	(1.52%)	(1.82%)	(4.28%)	(6.91%)
POOL, ALL ACTUAL VOL PREPAY INDEX	(0.05%)	(0.17%)	(0.34%)	(0.63%)	(1.57%)	(1.87%)	(4.14%)	(6.51%)
POOL, LONG EQUAL VOL PREPAY INDEX	(0.05%)	(0.17%)	(0.31%)	(0.59%)	(1.44%)	(1.68%)	(4.03%)	(6.61%)
POOL, LONG ACTUAL VOL PREPAY INDEX	(0.05%)	(0.17%)	(0.34%)	(0.62%)	(1.49%)	(1.72%)	(3.82%)	(6.15%)
POOL, SHORT EQUAL VOL PREPAY INDEX	(0.04%)	(0.15%)	(0.32%)	(0.63%)	(1.72%)	(2.20%)	(4.84%)	(7.84%)
POOL, SHORT ACTUAL VOL PREPAY INDEX	(0.04%)	(0.16%)	(0.34%)	(0.66%)	(1.82%)	(2.29%)	(4.89%)	(7.61%)
POOL, ALL EQUAL SCHED PRIN INDEX	(0.03%)	(0.09%)	(0.19%)	(0.38%)	(1.14%)	(1.76%)	(2.46%)	(3.26%)
POOL, ALL ACTUAL SCHED PRIN INDEX	(0.03%)	(0.09%)	(0.19%)	(0.38%)	(1.14%)	(1.76%)	(2.44%)	(3.17%)
POOL, LONG EQUAL SCHED PRIN INDEX	(0.02%)	(0.06%)	(0.13%)	(0.26%)	(0.78%)	(1.14%)	(1.48%)	(2.12%)
POOL, LONG ACTUAL SCHED PRIN INDEX	(0.02%)	(0.06%)	(0.13%)	(0.26%)	(0.77%)	(1.13%)	(1.43%)	(2.00%)
POOL, SHORT EQUAL SCHED PRIN INDEX	(0.05%)	(0.18%)	(0.39%)	(0.77%)	(2.25%)	(3.47%)	(5.21%)	(7.23%)
POOL, SHORT ACTUAL SCHED PRIN INDEX	(0.05%)	(0.18%)	(0.39%)	(0.78%)	(2.30%)	(3.53%)	(5.21%)	(7.15%)
POOL, ALL EQUAL TOTAL PRIN INDEX	(0.08%)	(0.27%)	(0.55%)	(1.09%)	(3.04%)	(4.23%)	(7.90%)	(11.80%)
POOL, ALL ACTUAL TOTAL PRIN INDEX	(0.08%)	(0.28%)	(0.58%)	(1.12%)	(3.11%)	(4.27%)	(7.73%)	(11.27%)
POOL, LONG EQUAL TOTAL PRIN INDEX	(0.07%)	(0.25%)	(0.49%)	(0.96%)	(2.58%)	(3.39%)	(6.52%)	(10.24%)
POOL, LONG ACTUAL TOTAL PRIN INDEX	(0.08%)	(0.25%)	(0.52%)	(0.98%)	(2.64%)	(3.42%)	(6.21%)	(9.58%)
POOL, SHORT EQUAL TOTAL PRIN INDEX	(0.10%)	(0.35%)	(0.76%)	(1.51%)	(4.41%)	(6.49%)	(11.55%)	(16.85%)
POOL, SHORT ACTUAL TOTAL PRIN INDEX	(0.10%)	(0.36%)	(0.79%)	(1.56%)	(4.57%)	(6.65%)	(11.62%)	(16.53%)

END DATE: 10/31/2015			SBI ST	RIP INDEX	TOTAL R	ETURN		
INDEX TYPE	1 MONTH	3 MONTH	6 MONTH	1 YEAR	3 YEAR	5 YEAR	10 YEAR	INCEPTION
STRIP, ALL EQUAL INDEX	3.23%	(8.06%)	(19.92%)	(13.30%)	(20.01%)	28.74%	51.05%	312.58%
STRIP, ALL ACTUAL INDEX	2.41%	(8.72%)	(20.80%)	(16.26%)	(22.09%)	23.91%	20.05%	238.45%
STRIP, LONG EQUAL INDEX	2.16%	(4.75%)	(14.93%)	(4.53%)	(0.32%)	72.85%	153.60%	653.97%
STRIP, LONG ACTUAL INDEX	1.80%	(4.65%)	(15.04%)	(4.61%)	(0.53%)	65.43%	80.62%	450.83%
STRIP, SHORT EQUAL INDEX	6.46%	(16.63%)	(31.87%)	(32.40%)	(51.07%)	(30.29%)	(33.40%)	16.22%
STRIP, SHORT ACTUAL INDEX	4.39%	(19.56%)	(34.88%)	(40.47%)	(55.96%)	(34.66%)	(39.33%)	24.06%
STRIP, ALL EQUAL INCOME INDEX	0.92%	2.69%	5.28%	10.87%	39.46%	112.90%	567.22%	2,508.37%
STRIP, ALL ACTUAL INCOME INDEX	0.91%	2.62%	5.14%	10.68%	38.78%	102.49%	409.66%	1,870.55%
STRIP, LONG EQUAL INCOME INDEX	0.91%	2.70%	5.39%	11.35%	44.65%	136.13%	795.67%	3,501.70%
STRIP, LONG ACTUAL INCOME INDEX	0.86%	2.54%	5.13%	10.92%	44.03%	121.67%	513.38%	2,330.86%
STRIP, SHORT EQUAL INCOME INDEX	0.98%	2.68%	5.02%	9.69%	29.66%	77.61%	337.05%	1,368.57%
STRIP, SHORT ACTUAL INCOME INDEX	1.08%	2.86%	5.19%	10.11%	28.89%	73.08%	298.78%	1,250.95%
STRIP, ALL EQUAL PRICE INDEX	3.45%	(7.10%)	(18.32%)	(10.05%)	(14.26%)	11.15%	20.13%	107.90%
STRIP, ALL ACTUAL PRICE INDEX	2.65%	(7.77%)	(19.09%)	(13.14%)	(17.00%)	10.64%	19.73%	112.76%
STRIP, LONG EQUAL PRICE INDEX	2.29%	(4.02%)	(13.94%)	(2.94%)	(3.98%)	17.40%	25.32%	125.96%
STRIP, LONG ACTUAL PRICE INDEX	2.00%	(3.83%)	(13.73%)	(2.68%)	(4.66%)	17.64%	24.91%	131.96%
STRIP, SHORT EQUAL PRICE INDEX	6.98%	(15.07%)	(28.96%)	(26.14%)	(34.72%)	(7.04%)	4.06%	40.16%
STRIP, SHORT ACTUAL PRICE INDEX	4.78%	(18.29%)	(32.39%)	(35.55%)	(41.61%)	(12.16%)	(0.44%)	48.44%
STRIP, ALL EQUAL PREPAY INDEX	(0.71%)	(2.40%)	(4.47%)	(8.48%)	(21.47%)	(28.68%)	(68.78%)	(85.23%)
STRIP, ALL ACTUAL PREPAY INDEX	(0.74%)	(2.40%)	(4.63%)	(8.55%)	(21.25%)	(28.19%)	(67.71%)	(84.53%)
STRIP, LONG EQUAL PREPAY INDEX	(0.73%)	(2.52%)	(4.56%)	(8.58%)	(20.63%)	(26.44%)	(68.97%)	(85.54%)
STRIP, LONG ACTUAL PREPAY INDEX	(0.76%)	(2.52%)	(4.78%)	(8.73%)	(20.36%)	(25.83%)	(68.19%)	(85.08%)
STRIP, SHORT EQUAL PREPAY INDEX	(0.65%)	(2.09%)	(4.22%)	(8.18%)	(22.91%)	(32.25%)	(65.91%)	(81.68%)
STRIP, SHORT ACTUAL PREPAY INDEX	(0.66%)	(2.06%)	(4.21%)	(8.05%)	(22.76%)	(31.88%)	(65.41%)	(80.64%)
STRIP, ALL EQUAL DEFAULT INDEX	(0.08%)	(0.28%)	(0.59%)	(1.31%)	(4.97%)	(9.40%)	(26.33%)	(36.64%)
STRIP, ALL ACTUAL DEFAULT INDEX	(0.08%)	(0.28%)	(0.62%)	(1.32%)	(4.86%)	(9.13%)	(26.16%)	(36.38%)
STRIP, LONG EQUAL DEFAULT INDEX	(0.08%)	(0.29%)	(0.61%)	(1.32%)	(4.65%)	(8.20%)	(24.43%)	(35.20%)
STRIP, LONG ACTUAL DEFAULT INDEX	(0.09%)	(0.29%)	(0.64%)	(1.35%)	(4.52%)	(7.86%)	(24.13%)	(34.90%)
STRIP, SHORT EQUAL DEFAULT INDEX	(0.07%)	(0.24%)	(0.56%)	(1.27%)	(5.52%)	(11.36%)	(28.15%)	(36.66%)
STRIP, SHORT ACTUAL DEFAULT INDEX	(0.07%)	(0.24%)	(0.57%)	(1.26%)	(5.48%)	(11.18%)	(28.22%)	(36.26%)
STRIP, ALL EQUAL VOL PREPAY INDEX	(0.63%)	(2.13%)	(3.89%)	(7.25%)	(17.34%)	(21.25%)	(57.53%)	(76.60%)
STRIP, ALL ACTUAL VOL PREPAY INDEX	(0.66%)	(2.13%)	(4.03%)	(7.31%)	(17.20%)	(20.94%)	(56.18%)	(75.60%)
STRIP, LONG EQUAL VOL PREPAY INDEX	(0.65%)	(2.23%)	(3.97%)	(7.35%)	(16.74%)	(19.85%)	(58.83%)	(77.60%)
STRIP, LONG ACTUAL VOL PREPAY INDEX	(0.68%)	(2.23%)	(4.16%)	(7.47%)	(16.57%)	(19.48%)	(57.97%)	(76.99%)
STRIP, SHORT EQUAL VOL PREPAY INDEX	(0.58%)	(1.85%)	(3.68%)	(6.99%)	(18.38%)	(23.53%)	(52.47%)	(70.99%)
STRIP, SHORT ACTUAL VOL PREPAY INDEX	(0.59%)	(1.83%)	(3.66%)	(6.87%)	(18.26%)	(23.27%)	(51.72%)	(69.55%)
STRIP, ALL EQUAL SCHED PRIN INDEX	(0.40%)	(1.22%)	(2.45%)	(4.88%)	(14.52%)	(23.44%)	(38.72%)	(47.98%)
STRIP, ALL ACTUAL SCHED PRIN INDEX	(0.37%)	(1.14%)	(2.29%)	(4.57%)	(13.80%)	(22.70%)	(38.18%)	(47.35%)
STRIP, LONG EQUAL SCHED PRIN INDEX	(0.28%)	(0.84%)	(1.67%)	(3.31%)	(9.43%)	(15.08%)	(26.00%)	(35.24%)
STRIP, LONG ACTUAL SCHED PRIN INDEX	(0.27%)	(0.80%)	(1.58%)	(3.12%)	(8.90%)	(14.32%)	(24.72%)	(33.90%)
STRIP, SHORT EQUAL SCHED PRIN INDEX	(0.76%)	(2.26%)	(4.46%)	(8.74%)	(24.35%)	(37.12%)	(56.35%)	(68.71%)
STRIP, SHORT ACTUAL SCHED PRIN INDEX	(0.71%)	(2.12%)	(4.19%)	(8.24%)	(23.47%)	(36.30%)	(55.11%)	(67.60%)
STRIP, ALL EQUAL TOTAL PRIN INDEX	(1.11%)	(3.60%)	(6.82%)	(12.97%)	(32.94%)	(45.48%)	(80.95%)	(92.36%)
STRIP, ALL ACTUAL TOTAL PRIN INDEX	(1.11%)	(3.52%)	(6.83%)	(12.76%)	(32.19%)	(44.57%)	(80.12%)	(91.90%)
STRIP, LONG EQUAL TOTAL PRIN INDEX	(1.01%)	(3.35%)	(6.17%)	(11.63%)	(28.16%)	(37.59%)	(77.09%)	(90.68%)
STRIP, LONG ACTUAL TOTAL PRIN INDEX	(1.03%)	(3.30%)	(6.30%)	(11.60%)	(27.49%)	(36.50%)	(76.11%)	(90.17%)
STRIP, SHORT EQUAL TOTAL PRIN INDEX	(1.41%)	(4.31%)	(8.52%)	(16.27%)	(41.81%)	(57.53%)	(85.23%)	(94.32%)
STRIP, SHORT ACTUAL TOTAL PRIN INDEX	(1.37%)	(4.15%)	(8.25%)	(15.67%)	(41.00%)	(56.73%)	(84.58%)	(93.79%)

END DATE: 10/31/2015			SBISE	BAP INDEX	TOTAL RE	TURN		
INDEX TYPE	1 MONTH	3 MONTH	6 MONTH	1 YEAR	3 YEAR	5 YEAR	10 YEAR	INCEPTION
SBAP, ALL EQUAL INDEX	(0.66%)	(0.06%)	(0.01%)	0.07%	0.28%	8.71%	48.47%	112.16%
SBAP, ALL ACTUAL INDEX	(0.77%)	(0.29%)	(0.14%)	(0.07%)	0.02%	9.69%	50.95%	120.15%
SBAP, LONG EQUAL INDEX	(0.79%)	(0.38%)	(0.28%)	(0.42%)	(0.49%)	8.95%	50.93%	118.81%
SBAP, LONG ACTUAL INDEX	(0.79%)	(0.33%)	(0.19%)	(0.14%)	(0.10%)	9.67%	51.08%	120.69%
SBAP, SHORT EQUAL INDEX	(0.42%)	0.98%	1.42%	2.69%	5.13%	11.14%	45.39%	99.56%
SBAP, SHORT ACTUAL INDEX	(0.37%)	1.02%	1.47%	2.83%	5.27%	11.28%	45.38%	98.44%
SBAP, ALL EQUAL INCOME INDEX	0.28%	0.83%	1.68%	3.41%	11.26%	21.20%	57.97%	128.24%
SBAP, ALL ACTUAL INCOME INDEX	0.30%	0.89%	1.81%	3.66%	11.92%	22.28%	59.45%	129.56%
SBAP, LONG EQUAL INCOME INDEX	0.30%	0.92%	1.86%	3.78%	12.41%	23.04%	62.12%	136.87%
SBAP, LONG ACTUAL INCOME INDEX	0.30%	0.90%	1.83%	3.71%	12.06%	22.50%	59.84%	130.29%
SBAP, SHORT EQUAL INCOME INDEX	0.18%	0.52%	1.07%	2.18%	7.45%	15.19%	44.99%	101.45%
SBAP, SHORT ACTUAL INCOME INDEX	0.16%	0.48%	0.97%	1.96%	6.43%	13.65%	43.17%	99.19%
SBAP, ALL EQUAL PRICE INDEX	(0.62%)	0.18%	0.41%	0.67%	(3.54%)	(1.96%)	3.97%	7.10%
SBAP, ALL ACTUAL PRICE INDEX	(0.67%)	0.07%	0.41%	0.71%	(4.07%)	(1.86%)	4.47%	9.10%
SBAP, LONG EQUAL PRICE INDEX	(0.66%)	0.05%	0.39%	0.64%	(4.18%)	(2.11%)	4.32%	8.18%
SBAP, LONG ACTUAL PRICE INDEX	(0.67%)	0.05%	0.41%	0.71%	(4.16%)	(1.91%)	4.47%	9.20%
SBAP, SHORT EQUAL PRICE INDEX	(0.49%)	0.59%	0.49%	0.80%	(1.26%)	(1.57%)	2.53%	2.80%
SBAP, SHORT ACTUAL PRICE INDEX	(0.47%)	0.60%	0.52%	0.88%	(0.74%)	(0.71%)	3.26%	2.96%
SBAP, ALL EQUAL PREPAY INDEX	(0.20%)	(0.73%)	(1.45%)	(2.70%)	(4.56%)	(5.83%)	(6.61%)	(9.41%)
SBAP, ALL ACTUAL PREPAY INDEX	(0.28%)	(0.89%)	(1.68%)	(3.06%)	(4.89%)	(6.11%)	(6.72%)	(8.89%)
SBAP, LONG EQUAL PREPAY INDEX	(0.30%)	(0.95%)	(1.78%)	(3.29%)	(5.37%)	(6.70%)	(7.58%)	(10.68%)
SBAP, LONG ACTUAL PREPAY INDEX	(0.29%)	(0.92%)	(1.73%)	(3.14%)	(5.00%)	(6.22%)	(6.83%)	(9.02%)
SBAP, SHORT EQUAL PREPAY INDEX	(0.03%)	(0.04%)	(0.04%)	(0.12%)	(0.45%)	(0.98%)	(1.14%)	(1.91%)
SBAP, SHORT ACTUAL PREPAY INDEX	(0.02%)	(0.02%)	0.01%	(0.03%)	(0.24%)	(0.77%)	(0.95%)	(1.81%)
SBAP, ALL EQUAL DEFAULT INDEX	(0.02%)	(0.06%)	(0.12%)	(0.25%)	(0.56%)	(1.15%)	(1.52%)	(1.84%)
SBAP, ALL ACTUAL DEFAULT INDEX	(0.03%)	(0.07%)	(0.14%)	(0.30%)	(0.67%)	(1.38%)	(1.82%)	(2.08%)
SBAP, LONG EQUAL DEFAULT INDEX	(0.03%)	(0.07%)	(0.15%)	(0.31%)	(0.67%)	(1.28%)	(1.66%)	(1.95%)
SBAP, LONG ACTUAL DEFAULT INDEX	(0.03%)	(0.07%)	(0.15%)	(0.31%)	(0.69%)	(1.40%)	(1.84%)	(2.10%)
SBAP, SHORT EQUAL DEFAULT INDEX	(0.00%)	(0.00%)	(0.01%)	(0.01%)	(0.05%)	(0.29%)	(0.47%)	(0.73%)
SBAP, SHORT ACTUAL DEFAULT INDEX	(0.00%)	(0.00%)	(0.00%)	(0.00%)	(0.02%)	(0.27%)	(0.47%)	(0.75%)
SBAP, ALL EQUAL VOL PREPAY INDEX	(0.18%)	(0.68%)	(1.33%)	(2.46%)	(4.02%)	(4.74%)	(5.16%)	(7.71%)
SBAP, ALL ACTUAL VOL PREPAY INDEX	(0.25%)	(0.82%)	(1.54%)	(2.77%)	(4.25%)	(4.80%)	(4.99%)	(6.95%)
SBAP, LONG EQUAL VOL PREPAY INDEX	(0.27%)	(0.87%)	(1.63%)	(2.99%)	(4.73%)	(5.48%)	(6.02%)	(8.91%)
SBAP, LONG ACTUAL VOL PREPAY INDEX	(0.26%)	(0.85%)	(1.58%)	(2.84%)	(4.34%)	(4.89%)	(5.09%)	(7.07%)
SBAP, SHORT EQUAL VOL PREPAY INDEX	(0.03%)	(0.04%)	(0.04%)	(0.11%)	(0.40%)	(0.69%)	(0.67%)	(1.19%)
SBAP, SHORT ACTUAL VOL PREPAY INDEX	(0.02%)	(0.01%)	0.01%	(0.03%)	(0.22%)	(0.50%)	(0.48%)	(1.06%)
SBAP, ALL EQUAL SCHED PRIN INDEX	(0.11%)	(0.33%)	(0.62%)	(1.21%)	(2.09%)	(2.84%)	(3.19%)	(4.19%)
SBAP, ALL ACTUAL SCHED PRIN INDEX	(0.12%)	(0.35%)	(0.65%)	(1.25%)	(2.03%)	(2.64%)	(2.84%)	(3.51%)
SBAP, LONG EQUAL SCHED PRIN INDEX	(0.13%)	(0.39%)	(0.72%)	(1.42%)	(2.35%)	(3.04%)	(3.43%)	(4.39%)
SBAP, LONG ACTUAL SCHED PRIN INDEX	(0.12%)	(0.36%)	(0.66%)	(1.29%)	(2.07%)	(2.67%)	(2.88%)	(3.53%)
SBAP, SHORT EQUAL SCHED PRIN INDEX	(0.07%)	(0.10%)	(0.11%)	(0.18%)	(0.46%)	(1.01%)	(1.08%)	(1.76%)
SBAP, SHORT ACTUAL SCHED PRIN INDEX	(0.04%)	(0.05%)	(0.03%)	(0.00%)	(0.11%)	(0.62%)	(0.72%)	(1.47%)
SBAP, ALL EQUAL TOTAL PRIN INDEX	(0.31%)	(1.06%)	(2.06%)	(3.88%)	(6.55%)	(8.51%)	(9.59%)	(13.20%)
SBAP, ALL ACTUAL TOTAL PRIN INDEX	(0.40%)	(1.24%)	(2.32%)	(4.28%)	(6.83%)	(8.59%)	(9.38%)	(12.09%)
SBAP, LONG EQUAL TOTAL PRIN INDEX	(0.43%)	(1.33%)	(2.49%)	(4.67%)	(7.60%)	(9.53%)	(10.76%)	(14.61%)
SBAP, LONG ACTUAL TOTAL PRIN INDEX	(0.42%)	(1.27%)	(2.38%)	(4.39%)	(6.98%)	(8.73%)	(9.52%)	(12.24%)
SBAP, SHORT EQUAL TOTAL PRIN INDEX	(0.10%)	(0.14%)	(0.15%)	(0.30%)	(0.91%)	(1.98%)	(2.21%)	(3.64%)
SBAP, SHORT ACTUAL TOTAL PRIN INDEX	(0.06%)	(0.06%)	(0.02%)	(0.03%)	(0.36%)	(1.39%)	(1.67%)	(3.25%)

END DATE: 10/31/2015			SBIS	BIC INDEX	TOTAL RE	TURN		
INDEX TYPE	1 MONTH	3 MONTH	6 MONTH	1 YEAR	3 YEAR	5 YEAR	10 YEAR	INCEPTION
SBIC, ALL EQUAL INDEX	(0.76%)	(2.75%)	(0.51%)	1.13%	5.60%	13.16%	55.82%	120.14%
SBIC, ALL ACTUAL INDEX	(0.73%)	(2.91%)	(0.75%)	1.06%	5.31%	14.59%	58.46%	128.71%
SBIC, ALL EQUAL INCOME INDEX	0.26%	0.77%	1.57%	3.18%	10.62%	20.43%	55.00%	123.81%
SBIC, ALL ACTUAL INCOME INDEX	0.25%	0.73%	1.47%	2.96%	9.63%	18.77%	52.13%	116.80%
SBIC, ALL EQUAL PRICE INDEX	(0.82%)	(3.31%)	(1.85%)	(1.52%)	(2.57%)	(2.02%)	5.52%	6.58%
SBIC, ALL ACTUAL PRICE INDEX	(0.86%)	(3.50%)	(2.08%)	(1.61%)	(2.85%)	(0.95%)	7.56%	11.42%
SBIC, ALL EQUAL PREPAY INDEX	(0.20%)	(0.20%)	(0.20%)	(0.47%)	(2.02%)	(4.11%)	(4.74%)	(7.72%)
SBIC, ALL ACTUAL PREPAY INDEX	(0.11%)	(0.11%)	(0.11%)	(0.24%)	(1.14%)	(2.60%)	(3.17%)	(5.33%)
SBIC, ALL EQUAL DEFAULT INDEX	(0.01%)	(0.01%)	(0.01%)	(0.01%)	(0.23%)	(0.49%)	(0.62%)	(1.38%)
SBIC, ALL ACTUAL DEFAULT INDEX	(0.01%)	(0.01%)	(0.01%)	(0.01%)	(0.14%)	(0.32%)	(0.45%)	(1.07%)
SBIC, ALL EQUAL VOL PREPAY INDEX	(0.19%)	(0.19%)	(0.19%)	(0.47%)	(1.80%)	(3.64%)	(4.14%)	(6.43%)
SBIC, ALL ACTUAL VOL PREPAY INDEX	(0.11%)	(0.11%)	(0.11%)	(0.24%)	(1.00%)	(2.29%)	(2.73%)	(4.30%)
SBIC, ALL EQUAL SCHED PRIN INDEX	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
SBIC, ALL ACTUAL SCHED PRIN INDEX	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
SBIC, ALL EQUAL TOTAL PRIN INDEX	(0.20%)	(0.20%)	(0.20%)	(0.47%)	(2.02%)	(4.11%)	(4.74%)	(7.72%)
SBIC, ALL ACTUAL TOTAL PRIN INDEX	(0.11%)	(0.11%)	(0.11%)	(0.24%)	(1.14%)	(2.60%)	(3.17%)	(5.33%)



END DATE: 10/31/2015			SBI COMP	OSITE IND	EX TOTAL	RETURN		
INDEX TYPE	1 MONTH	3 MONTH	6 MONTH	1 YEAR	3 YEAR	5 YEAR	10 YEAR	INCEPTION
COMP, ALL EQUAL INDEX	(0.17%)	(0.70%)	(1.02%)	0.05%	1.15%	11.34%	55.06%	117.77%
COMP, ALL ACTUAL INDEX	(0.24%)	(0.84%)	(1.14%)	(0.09%)	0.95%	11.19%	52.15%	116.33%
COMP, LONG EQUAL INDEX	(0.30%)	(0.38%)	(0.84%)	(0.00%)	0.83%	12.22%	59.46%	126.65%
COMP, LONG ACTUAL INDEX	(0.32%)	(0.35%)	(0.80%)	0.18%	1.10%	11.69%	54.43%	120.35%
COMP, SHORT EQUAL INDEX	(0.02%)	(2.19%)	(1.87%)	(0.29%)	1.67%	10.15%	46.62%	100.96%
COMP, SHORT ACTUAL INDEX	(0.02%)	(2.38%)	(2.18%)	(0.74%)	1.11%	10.18%	44.51%	100.76%
COMP, ALL EQUAL INCOME INDEX	0.27%	0.81%	1.63%	3.31%	10.84%	22.41%	68.67%	142.70%
COMP, ALL ACTUAL INCOME INDEX	0.28%	0.83%	1.68%	3.41%	11.14%	21.81%	63.59%	133.94%
COMP, LONG EQUAL INCOME INDEX	0.28%	0.85%	1.72%	3.49%	11.49%	23.77%	72.27%	149.55%
COMP, LONG ACTUAL INCOME INDEX	0.28%	0.83%	1.69%	3.44%	11.34%	22.27%	64.63%	135.61%
COMP, SHORT EQUAL INCOME INDEX	0.28%	0.84%	1.69%	3.40%	10.94%	21.60%	64.95%	136.24%
COMP, SHORT ACTUAL INCOME INDEX	0.28%	0.82%	1.65%	3.32%	10.46%	20.14%	59.60%	126.76%
COMP, ALL EQUAL PRICE INDEX	(0.21%)	(0.76%)	(1.19%)	(0.39%)	(3.13%)	(1.23%)	3.36%	6.92%
COMP, ALL ACTUAL PRICE INDEX	(0.25%)	(0.85%)	(1.24%)	(0.45%)	(3.52%)	(0.99%)	4.08%	8.72%
COMP, LONG EQUAL PRICE INDEX	(0.26%)	(0.21%)	(0.62%)	0.25%	(3.15%)	(0.93%)	4.38%	8.67%
COMP, LONG ACTUAL PRICE INDEX	(0.28%)	(0.20%)	(0.62%)	0.31%	(3.16%)	(0.76%)	4.62%	9.49%
COMP, SHORT EQUAL PRICE INDEX	(0.12%)	(2.64%)	(2.85%)	(2.20%)	(3.76%)	(1.86%)	1.74%	3.41%
COMP, SHORT ACTUAL PRICE INDEX	(0.17%)	(2.87%)	(3.17%)	(2.70%)	(4.20%)	(1.26%)	2.87%	5.98%
COMP, ALL EQUAL PREPAY INDEX	(0.16%)	(0.52%)	(0.99%)	(1.91%)	(3.94%)	(5.27%)	(7.84%)	(12.00%)
COMP, ALL ACTUAL PREPAY INDEX	(0.19%)	(0.58%)	(1.11%)	(2.07%)	(4.04%)	(5.28%)	(7.62%)	(11.21%)
COMP, LONG EQUAL PREPAY INDEX	(0.22%)	(0.72%)	(1.36%)	(2.56%)	(4.68%)	(5.90%)	(8.32%)	(12.62%)
COMP, LONG ACTUAL PREPAY INDEX	(0.22%)	(0.71%)	(1.35%)	(2.49%)	(4.47%)	(5.60%)	(7.70%)	(11.29%)
COMP, SHORT EQUAL PREPAY INDEX	(0.15%)	(0.24%)	(0.39%)	(0.82%)	(2.92%)	(4.80%)	(8.32%)	(12.37%)
COMP, SHORT ACTUAL PREPAY INDEX	(0.10%)	(0.19%)	(0.35%)	(0.70%)	(2.54%)	(4.12%)	(7.61%)	(11.03%)
COMP, ALL EQUAL DEFAULT INDEX	(0.01%)	(0.04%)	(0.10%)	(0.20%)	(0.61%)	(1.17%)	(1.88%)	(2.64%)
COMP, ALL ACTUAL DEFAULT INDEX	(0.02%)	(0.05%)	(0.11%)	(0.23%)	(0.67%)	(1.29%)	(2.03%)	(2.72%)
COMP, LONG EQUAL DEFAULT INDEX	(0.02%)	(0.06%)	(0.13%)	(0.27%)	(0.70%)	(1.27%)	(1.90%)	(2.61%)
COMP, LONG ACTUAL DEFAULT INDEX	(0.02%)	(0.06%)	(0.13%)	(0.27%)	(0.71%)	(1.35%)	(2.01%)	(2.68%)
COMP, SHORT EQUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.04%)	(0.09%)	(0.53%)	(1.08%)	(2.10%)	(3.06%)
COMP, SHORT ACTUAL DEFAULT INDEX	(0.01%)	(0.02%)	(0.04%)	(0.09%)	(0.51%)	(1.02%)	(2.06%)	(2.91%)
COMP, ALL EQUAL VOL PREPAY INDEX	(0.15%)	(0.47%)	(0.90%)	(1.71%)	(3.34%)	(4.15%)	(6.08%)	(9.61%)
COMP, ALL ACTUAL VOL PREPAY INDEX	(0.17%)	(0.53%)	(1.00%)	(1.85%)	(3.39%)	(4.04%)	(5.71%)	(8.73%)
COMP, LONG EQUAL VOL PREPAY INDEX	(0.20%)	(0.66%)	(1.24%)	(2.30%)	(4.01%)	(4.69%)	(6.54%)	(10.27%)
COMP, LONG ACTUAL VOL PREPAY INDEX	(0.20%)	(0.65%)	(1.22%)	(2.22%)	(3.78%)	(4.31%)	(5.80%)	(8.85%)
COMP, SHORT EQUAL VOL PREPAY INDEX	(0.14%)	(0.22%)	(0.35%)	(0.73%)	(2.40%)	(3.76%)	(6.35%)	(9.60%)
COMP, SHORT ACTUAL VOL PREPAY INDEX	(0.09%)	(0.17%)	(0.30%)	(0.61%)	(2.04%)	(3.12%)	(5.67%)	(8.36%)
COMP, ALL EQUAL SCHED PRIN INDEX	(0.07%)	(0.22%)	(0.44%)	(0.88%)	(1.92%)	(2.78%)	(3.48%)	(4.63%)
COMP, ALL ACTUAL SCHED PRIN INDEX	(0.08%)	(0.23%)	(0.45%)	(0.90%)	(1.89%)	(2.66%)	(3.26%)	(4.20%)
COMP, LONG EQUAL SCHED PRIN INDEX	(0.10%)	(0.28%)	(0.54%)	(1.08%)	(2.03%)	(2.74%)	(3.27%)	(4.34%)
COMP, LONG ACTUAL SCHED PRIN INDEX	(0.09%)	(0.26%)	(0.50%)	(0.99%)	(1.84%)	(2.48%)	(2.86%)	(3.71%)
COMP, SHORT EQUAL SCHED PRIN INDEX	(0.04%)	(0.13%)	(0.28%)	(0.58%)	(1.90%)	(3.05%)	(4.71%)	(6.12%)
COMP, SHORT ACTUAL SCHED PRIN INDEX	(0.04%)	(0.13%)	(0.28%)	(0.57%)	(1.95%)	(3.13%)	(4.73%)	(6.10%)
COMP, ALL EQUAL TOTAL PRIN INDEX	(0.23%)	(0.74%)	(1.43%)	(2.78%)	(5.79%)	(7.91%)	(11.05%)	(16.08%)
COMP, ALL ACTUAL TOTAL PRIN INDEX	(0.26%)	(0.81%)	(1.56%)	(2.95%)	(5.85%)	(7.80%)	(10.64%)	(14.94%)
COMP, LONG EQUAL TOTAL PRIN INDEX	(0.32%)	(1.01%)	(1.90%)	(3.61%)	(6.62%)	(8.48%)	(11.32%)	(16.42%)
COMP, LONG ACTUAL TOTAL PRIN INDEX	(0.31%)	(0.97%)	(1.85%)	(3.45%)	(6.23%)	(7.95%)	(10.34%)	(14.58%)
COMP, SHORT EQUAL TOTAL PRIN INDEX	(0.19%)	(0.37%)	(0.67%)	(1.39%)	(4.77%)	(7.70%)	(12.64%)	(17.74%)
COMP, SHORT ACTUAL TOTAL PRIN INDEX	(0.14%)	(0.31%)	(0.62%)	(1.26%)	(4.45%)	(7.12%)	(11.98%)	(16.46%)



SBA 7(a) Credit Approval Memorandum

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504 DEBENTURE SPEEDS

This month, 20 year debenture prepayment speeds increased by 10.32% moving back above CPR 10% after one month below that benchmark

This is an off-month for ten year paper, so more on that next month.

Returning to 20s, the reason for the increase in the CPR was a fall in defaults (CDR) that was offset by an increase in voluntary prepayments (CRR).

For October, defaults fell by 37% to CDR 0.68% from CDR 1.07% while voluntary prepayments increased by 16.38% to CRR 9.38% from CRR 8.06%. While the percentage increase in CRR was lower than the percent decrease in the CDR, the higher starting point for the CRR more than offset the decrease in the CDR.

Once again, the data supports what we have been seeing in both the 7a and 504 programs: Low defaults combined with rising voluntary prepayments.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report.



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Data and Charts begin on the next page

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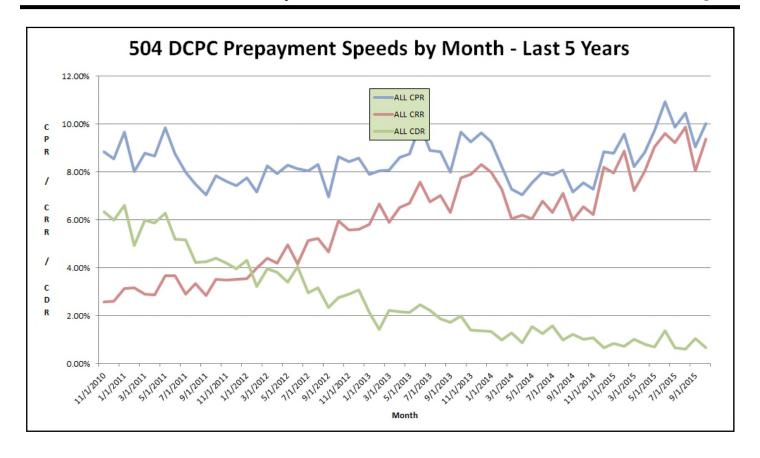
- SBA 7(a), 504 1st mortgage and **USDA** servicing rights
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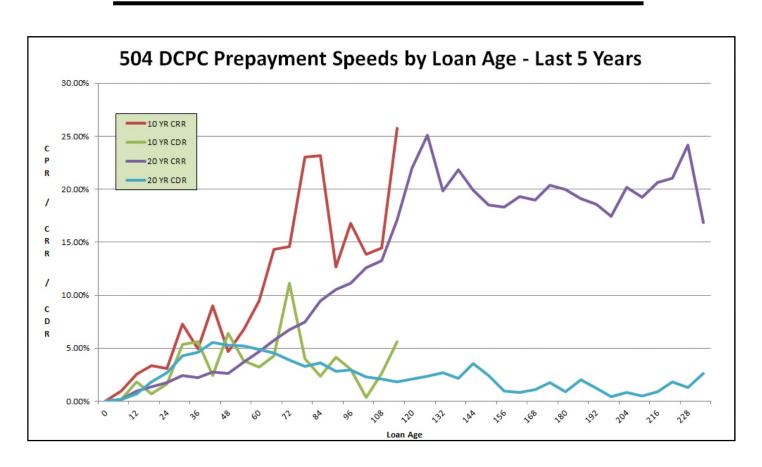
In these times of market uncertainty, let GLS help you in determining the value of your SBA and USDA related-assets.

For further information, please contact Bob Judge at (216) 456-2480 ext. 133 or at bob.judge@glsolutions.us

504 DCPC PREPAY SPEEDS - LAST 5 YEARS

DATE	20 YR. CPR	20 YR. CRR	20 YR. CDR	10 YR. CPR	10 YR. CRR	10 YR. CDR	ALL CPR	ALL CRR	ALL CDR
11/1/2010	8.67%	2.45%	6.30%	13.41%	6.19%	7.46%	8.83%	2.58%	6.34%
12/1/2010	8.55%	2.62%	6.00%	NA	NA	NA	8.55%	2.62%	6.00%
1/1/2011	9.69%	3.12%	6.68%	8.75%	3.77%	5.07%	9.65%	3.14%	6.62%
2/1/2011	8.02%	3.16%	4.94%	NA	NA	NA	8.02%	3.16%	4.94%
3/1/2011	8.72%	2.79%	6.02%	10.58%	5.55%	5.18%	8.79%	2.90%	5.98%
4/1/2011	8.67%	2.89%	5.87%	NA	NA	NA	8.67%	2.89%	5.87%
5/1/2011	9.52%	3.39%	6.24%	17.57%	10.28%	7.70%	9.83%	3.66%	6.29%
6/1/2011	8.76%	3.67%	5.19%	NA	NA	NA	8.76%	3.67%	5.19%
7/1/2011	7.92%	2.89%	5.11%	9.70%	3.03%	6.77%	7.99%	2.89%	5.17%
8/1/2011	7.48%	3.33%	4.22%	NA	NA	NA	7.48%	3.33%	4.22%
9/1/2011	6.82%	2.78%	4.11%	12.26%	4.57%	7.87%	7.05%	2.85%	4.26%
10/1/2011	7.85%	3.53%	4.40%	NA	NA	NA	7.85%	3.53%	4.40%
11/1/2011	7.80%	3.55%	4.33%	3.07%	1.89%	1.19%	7.61%	3.48%	4.21%
12/1/2011	7.42%	3.52%	3.97%	NA	NA	NA	7.42%	3.52%	3.97%
1/1/2012	7.74%	3.51%	4.31%	8.37%	4.17%	4.29%	7.77%	3.54%	4.31%
2/1/2012	7.16%	3.98%	3.24%	NA	NA	NA	7.16%	3.98%	3.24%
3/1/2012	8.15%	4.27%	3.97%	10.74%	7.16%	3.72%	8.26%	4.39%	3.96%
4/1/2012	7.94%	4.21%	3.82%	NA	NA	NA	7.94%	4.21%	3.82%
5/1/2012	8.42%	5.00%	3.50%	4.98%	4.06%	0.94%	8.27%	4.96%	3.40%
6/1/2012	8.13%	4.16%	4.05%	NA	NA	NA	8.13%	4.16%	4.05%
7/1/2012	7.76%	4.87%	2.97%	14.16%	11.42%	2.91%	8.03%	5.14%	2.97%
8/1/2012	8.31%	5.24%	3.15%	NA	NA	NA	8.31%	5.24%	3.15%
9/1/2012	6.94%	4.65%	2.35%	7.36%	5.23%	2.18%	6.96%	4.68%	2.34%
10/1/2012	8.64%	5.97%	2.76%	NA	NA	NA	8.64%	5.97%	2.76%
11/1/2012	8.44%	5.56%	2.97%	7.83%	6.30%	1.59%	8.42%	5.59%	2.91%
12/1/2012	8.58%	5.59%	3.08%	NA	NA	NA	8.58%	5.59%	3.08%
1/1/2013	7.81%	5.68%	2.19%	9.97%	8.88%	1.13%	7.90%	5.82%	2.14%
2/1/2013	8.05%	6.68%	1.42%	NA 5.049/	NA	NA 1.070/	8.05%	6.68%	1.42%
3/1/2013	8.17%	5.96%	2.28%	5.94%	4.90%	1.07%	8.07%	5.91%	2.23%
4/1/2013	8.62%	6.51%	2.18%	NA 5 (10)	NA 2.000/	NA 1.049/	8.62%	6.51%	2.18%
5/1/2013	8.92% 9.94%	6.85% 7.58%	2.14%	5.61% NA	3.80% NA	1.84% NA	8.75% 9.94%	6.70% 7.58%	2.13% 2.46%
6/1/2013 7/1/2013	9.94%	6.89%	2.26%	5.08%	3.84%	1.26%	8.90%	6.75%	2.40%
8/1/2013	8.83%	7.03%	1.87%	NA	NA	NA	8.83%	7.03%	1.87%
9/1/2013	7.94%	6.27%	1.72%	9.05%	7.11%	2.01%	8.00%	6.31%	1.74%
10/1/2013	9.66%	7.75%	1.98%	NA	NA	NA	9.66%	7.75%	1.98%
11/1/2013	9.37%	7.98%	1.44%	7.28%	6.48%	0.83%	9.26%	7.90%	1.41%
12/1/2013	9.64%	8.32%	1.38%	NA	NA	NA	9.64%	8.32%	1.38%
1/1/2014	9.54%	8.24%	1.36%	3.36%	2.59%	0.78%	9.26%	7.98%	1.34%
2/1/2014	8.24%	7.28%	0.99%	NA	NA	NA	8.24%	7.28%	0.99%
3/1/2014	7.24%	6.00%	1.28%	7.88%	6.73%	1.19%	7.27%	6.04%	1.28%
4/1/2014	7.06%	6.20%	0.89%	NA	NA	NA	7.06%	6.20%	0.89%
5/1/2014	7.59%	6.20%	1.44%	7.01%	3.31%	3.77%	7.56%	6.05%	1.56%
6/1/2014	8.00%	6.80%	1.25%	NA	NA	NA	8.00%	6.80%	1.25%
7/1/2014	7.74%	6.19%	1.60%	10.43%	8.94%	1.55%	7.86%	6.32%	1.59%
8/1/2014	8.06%	7.11%	0.99%	NA	NA	NA	8.06%	7.11%	0.99%
9/1/2014	7.29%	6.08%	1.25%	4.81%	4.14%	0.69%	7.17%	5.99%	1.22%
10/1/2014	7.54%	6.56%	1.01%	NA	NA	NA	7.54%	6.56%	1.01%
11/1/2014	7.43%	6.38%	1.08%	4.84%	3.61%	1.25%	7.29%	6.24%	1.09%
12/1/2014	8.85%	8.20%	0.68%	NA C 2707	NA 5 (50)	NA	8.85%	8.20%	0.68%
1/1/2015	8.90%	8.08%	0.86%	6.37%	5.65%	0.74%	8.79%	7.97%	0.85%
2/1/2015	9.56%	8.88%	0.71%	NA 7 229/	NA	NA 0.65%	9.56%	8.88%	0.71%
3/1/2015	8.27%	7.25%	1.05%	7.23% NIA	6.60% NIA	0.65% NA	8.22%	7.22%	1.03%
4/1/2015 5/1/2015	8.80% 9.65%	8.03% 8.99%	0.81%	NA 10.87%	NA 0.05%		8.80%	8.03%	0.81%
5/1/2015 6/1/2015			0.69%	10.87% NA	9.95% NA	0.97% NA	9.72% 10.92%	9.04%	
7/1/2015	10.92% 10.11%	9.60% 9.45%	1.38% 0.70%	4.62%	4.23%	0.40%	9.87%	9.00%	1.38% 0.68%
8/1/2015	10.11%	9.43%	0.62%	4.0276 NA	4.2376 NA	0.4076 NA	10.45%	9.87%	0.62%
9/1/2015	9.09%	8.06%	1.07%	8.31%	7.92%	0.41%	9.05%	8.05%	1.04%
10/1/2015	10.02%	9.38%	0.68%	NA	NA	NA	10.02%	9.38%	0.68%
10/1/2013	10.04/0	J.JU/U	0.0070	1 1/1	1 47 7	1 41.7	10.02/0	7.5070	0.0070





GLS 7(a) Settlement & Sales Strategies Self-assessment and audit strategy...

Oftentimes, one of the hardest things to do is taking a very close look at oneself. This is true of individuals as well as corporations. It's often easier to disregard this process rather than risk exposing a vulnerability that might lead to increased scrutiny. The potential consequences of not doing so, however, can far outweigh those of proactive self-assessment, particularly under an audit scenario.

Specifically, it's critical that the finance and accounting staff assess and determine their own level of understanding regarding the sale of and accounting for, loans sold in the secondary market. Loan sales generate significant income as well as balance sheet items and accuracy alone is not enough to satisfy most auditors anymore. Not only do the numbers need to be spot on, but equally important, you have to be able to defend and explain them as well as the data and methodologies used to derive them.

Scott Evans is a partner at GLS. Mr. Evans has over 25 years of trading experience and has been involved in the SBA secondary markets for the last eight of those years. Mr. Evans has bought, sold, settled, and securitized nearly 20,000 SBA loans and now brings some of that expertise to the CPR Report in a recurring article called Sale and Settlement Tip of the Month. The article will focus on pragmatic tips aimed at helping lenders develop a more consistent sale and settlement process and ultimately deliver them the best execution possible.



The nationwide leader in the valuation of SBA and USDA assets.

GLS provides valuations for:

- SBA 7(a), 504 1st mortgage and **USDA** servicing rights
- SBA 7(a) and 504 1st mortgage pools
- Guaranteed and non-guaranteed 7(a) loan portions Interest-only portions of SBA and USDA loans

In these times of market uncertainty, let GLS help you in determining the value of your SBA and USDA related-assets.

For further information, please contact Bob Judge at (216) 456-2480 ext. 133 or at bob.judge@glsolutions.us

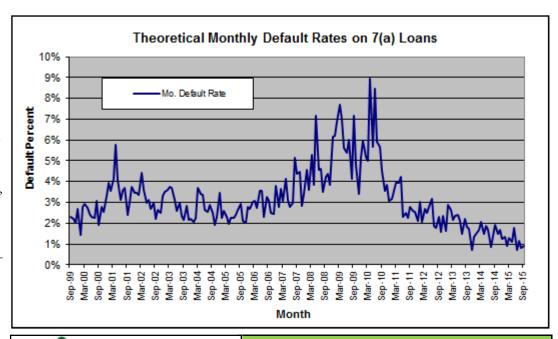
DEFAULT RATE UPDATE

In September, the theoretical default rate rose by 10% to 0.92% from 0.83% the previous month.

This level represents the 5th lowest reading in our database and is the 18th sub-2% print in a row.

As it has for the past two years, we continue to see historically low default rates in 7a lending.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report.





"Spectacular achievement is always preceded by unspectacular preparation."

Robert H. Schuller

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DEFAULT-CURTAILMENT RATIOS

In our Default-Curtailment Ratios (DCR) we witnessed an increase in both the 7a and the 504 ratios last month.

Please note that an increase in the DCR does not necessarily mean that the default rate is rising, only that the percentage of early curtailments attributable to defaults has increased.

SBA 7(a) Default Ratios

Last month, the 7(a) DCR registered a 21% increase to 11.21% from 9.30% the previous month. This reading represents the twelfth reading in a row below 20%.

The cause of this increase was the fact that defaults rose and voluntary prepayments decreased.

Turning to actual dollar amounts, defaults rose by 18% to \$40 million from \$34 million. As for voluntary prepayments, they decreased by 4% to \$320 million versus \$333 million previously.

SBA 504 Default Ratios

This month, the 504 DCR rose by 96% to 10.81% from 5.52% previously. With defaults rising and voluntary prepayments falling, the ratio increased.

Specifically, the dollar amount of defaults increased by \$13 million to \$26 million (+98%). As for voluntary prepayments, they fell by \$10 million to \$216 million (-4%).

Summary

The 504 ratio rose significantly, but that was after recording a nine-year low in August. As for the 7a ratio, we still are in the teens, an extremely favorable level on an historical basis.

While both increased, the absolute levels still suggest strength in the small business sector.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report.

Graph on page 33

GLS VALUE INDICES HIGHER ACROSS THE BOARD

In September, the GLS Value Indices rose in all six sub-indices for the fourth month in a row, as the Secondary Market continued its correction unabated.

The Base Rate / Libor spread was down one basis point to +292 basis points while prepayment speeds rose in five out of six maturity buckets.

By the end of the month, the secondary market was down over a point as the Secondary Market continued the decline that began in June.

Specifically, long maturity, fully priced loans fell 1.10 to 116.50 from 117.60.

Turning to the specifics, the largest increase was seen in the GLS VI-2, which rose by 34% to 118 basis points. The other increases, by order of magnitude, were seen in VI-3 (+29% to 138), VI-1 (+23% to 141), VI-4 (+9% to 188), VI-5 (+6% to 143) and VI-6 (+4% to 172).

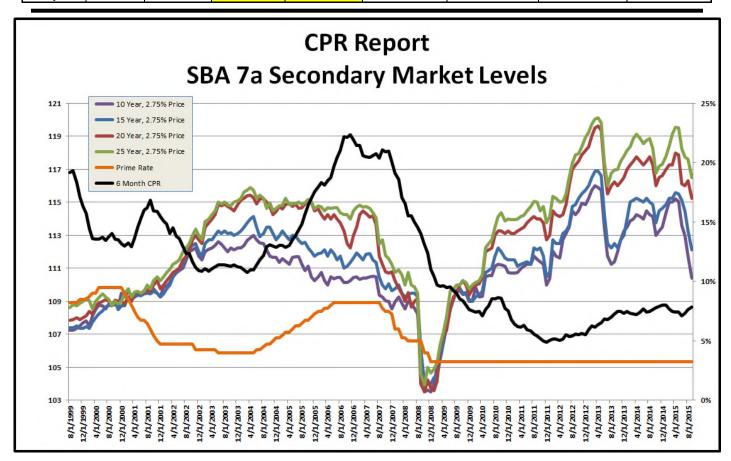
Expect to see some declines next month as the Secondary Market begins to recover some of its losses.

For further information on the terminology and concepts used in this article, please refer to the "Glossary and Definitions" at the end of the report.

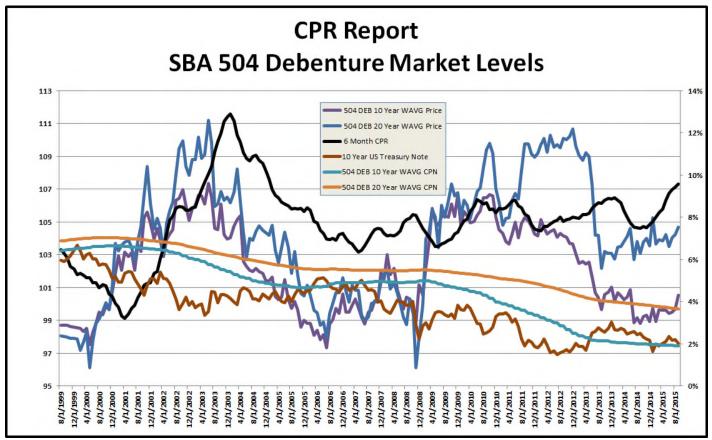
Data & Graphs on the following pages

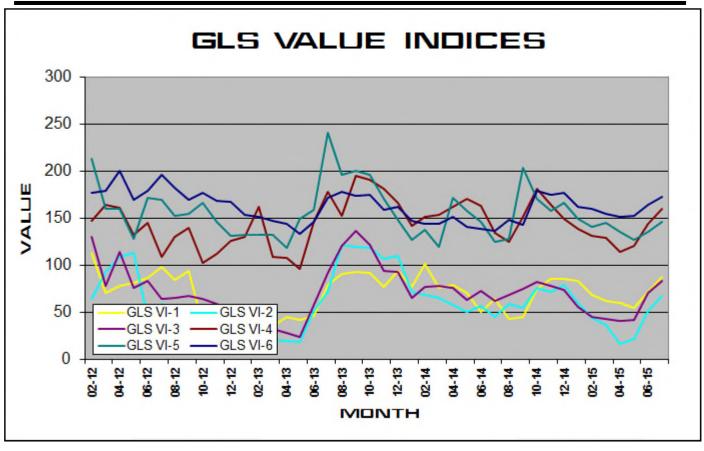
7(a) Secondary Market Pricing Grid: September 2015

Maturity	Gross Margin	Net Margin	Servicing	This Month Price	Last Month Price	3-Mos. Ago Price	6-Mos. Ago Price	1-Yr. Ago Price
10 yrs.	2.75%	1.075%	1.00%	110.40	111.75	113.625	115.00	114.125
15 yrs.	2.75%	1.075%	1.00%	112.125	113.25	115.125	115.25	114.875
20 yrs.	2.75%	1.075%	1.00%	115.25	116.30	116.125	117.25	117.25
25 yrs.	2.75%	1.075%	1.00%	116.50	117.60	118.25	119.125	118.25



SECONDARY MARKET AND VALUE INDICES CHARTS





GLS VALUE INDICES: SUPPORTING DATA

Table 1:

	BUCKET	BUCKET	BUCKET	BUCKET	BUCKET	BUCKET
MONTH	1 CPR	2 CPR	3 CPR	4 CPR	5 CPR	6 CPR
Apr-12	8.52%	8.55%	6.18%	5.46%	4.65%	4.20%
May-12	10.19%	8.24%	6.31%	6.03%	4.86%	4.28%
Jun-12	10.42%	9.19%	6.72%	6.54%	4.93%	4.58%
Jul-12	10.78%	8.90%	6.50%	6.63%	5.55%	4.40%
Aug-12	11.30%	8.23%	6.67%	7.18%	5.97%	4.40%
Sep-12	12.35%	8.72%	6.85%	6.90%	6.46%	4.44%
Oct-12	11.44%	8.16%	7.16%	6.52%	6.34%	4.40%
Nov-12	11.31%	8.21%	7.15%	6.16%	6.19%	4.62%
Dec-12	10.87%	7.49%	7.26%	5.99%	5.74%	4.49%
Jan-13	10.83%	7.82%	7.82%	5.83%	6.36%	4.90%
Feb-13	10.54%	7.81%	8.55%	5.20%	6.47%	5.17%
Mar-13	9.73%	7.46%	8.01%	5.81%	6.54%	5.28%
Apr-13	10.37%	8.50%	8.08%	5.90%	6.50%	5.52%
May-13	8.84%	9.12%	8.56%	5.97%	6.42%	5.57%
Jun-13	9.66%	10.04%	8.76%	6.24%	7.14%	5.93%
Jul-13	11.26%	9.24%	8.76%	5.75%	6.87%	5.84%
Aug-13	11.45%	9.23%	8.70%	5.97%	7.97%	6.14%
Sep-13	11.88%	10.04%	9.00%	5.90%	8.14%	6.33%
Oct-13	11.43%	9.26%	9.19%	6.49%	8.53%	6.58%
Nov-13	11.70%	8.32%	8.70%	6.10%	8.35%	6.91%
Dec-13	10.83%	7.39%	8.48%	5.75%	8.88%	6.75%
Jan-14	9.77%	8.30%	8.51%	5.62%	8.64%	6.98%
Feb-14	10.84%	8.57%	8.24%	5.10%	7.64%	6.96%
Mar-14	10.19%	8.05%	8.28%	4.93%	6.69%	6.98%
Apr-14	10.81%	8.22%	8.09%	5.16%	6.23%	6.93%
May-14	11.52%	9.21%	8.40%	5.02%	6.34%	7.06%
Jun-14	12.95%	10.45%	8.36%	5.03%	6.26%	7.41%
Jul-14	13.85%	9.91%	8.15%	6.30%	5.80%	7.12%
Aug-14	12.76%	9.40%	8.22%	6.19%	5.52%	7.19%
Sep-14	13.97%	9.08%	8.22%	5.90%	6.12%	7.42%
Oct-14	14.15%	9.41%	8.52%	4.76%	6.44%	7.57%
Nov-14	13.67%	9.52%	8.62%	5.62%	7.22%	7.62%
Dec-14	13.88%	8.24%	8.44%	6.79%	6.08%	7.36%
Jan-15	12.62%	8.53%	8.31%	7.41%	6.86%	7.88%
Feb-15	13.48%	8.66%	8.01%	7.39%	7.25%	7.51%
Mar-15	12.41%	8.96%	8.08%	7.35%	6.58%	7.23%
Apr-15	12.52%	10.28%	7.85%	8.24%	6.83%	7.07%
May-15	12.75%	10.04%	7.97%	7.88%	7.06%	7.01%
Jun-15	11.90%	10.18%	8.09%	6.30%	7.44%	7.12%
Jul-15	11.63%	10.20%	8.09%	5.60%	7.39%	6.92%
Aug-15	10.38%	10.91%	8.20%	5.95%	7.74%	7.35%
Sep-15	10.53%	11.19%	7.99%	5.99%	8.23%	7.68%

GLS VALUE INDICES: HISTORICAL VALUES

Table 2:

			BASE						
	WAVG	WAVG	LIBOR	GLS	GLS	GLS	GLS	GLS	GLS
MONTH	LIBOR	BASE	SPD	VI-1	VI-2	VI-3	VI-4	VI-5	VI-6
Apr-12	0.42%	3.25%	2.83%	79	110	115	161	160	201
May-12	0.43%	3.24%	2.81%	81	113	76	133	128	170
Jun-12	0.41%	3.23%	2.83%	87	44	84	146	172	180
Jul-12	0.39%	3.25%	2.86%	98	59	65	109	170	197
Aug-12	0.36%	3.25%	2.89%	85	56	66	130	153	182
Sep-12	0.33%	3.25%	2.91%	94	40	68	141	155	170
Oct-12	0.30%	3.25%	2.95%	37	46	65	103	166	177
Nov-12	0.29%	3.25%	2.95%	60	53	59	113	146	168
Dec-12	0.29%	3.25%	2.96%	55	58	55	126	131	168
Jan-13	0.28%	3.25%	2.97%	40	55	46	130	133	154
Feb-13	0.26%	3.24%	2.98%	32	37	34	163	133	152
Mar-13	0.26%	3.25%	2.99%	36	21	33	109	133	148
Apr-13	0.26%	3.25%	2.99%	45	21	29	108	119	145
May-13	0.26%	3.25%	2.99%	43	19	24	97	150	134
Jun-13	0.26%	3.25%	2.99%	46	52	58	147	159	147
Jul-13	0.25%	3.25%	2.99%	80	73	92	178	241	172
Aug-13	0.25%	3.25%	3.00%	91	122	120	153	197	178
Sep-13	0.23%	3.24%	3.00%	93	120	137	196	200	174
Oct-13	0.23%	3.25%	3.02%	92	119	122	191	197	175
Nov-13	0.23%	3.25%	3.02%	77	107	94	182	171	159
Dec-13	0.23%	3.25%	3.02%	95	110	94	166	149	162
Jan-14	0.23%	3.25%	3.02%	78	72	66	142	127	147
Feb-14	0.23%	3.25%	3.02%	102	69	77	152	138	145
Mar-14	0.22%	3.25%	3.03%	76	66	78	154	120	144
Apr-14	0.22%	3.25%	3.03%	79	59	76	162	172	152
May-14	0.22%	3.25%	3.03%	71	51	63	171	159	142
Jun-14	0.22%	3.25%	3.03%	51	57	73	163	147	139
Jul-14	0.23%	3.25%	3.02%	64	45	63	135	125	137
Aug-14	0.23%	3.25%	3.02%	44	60	69	125	128	149
Sep-14	0.22%	3.25%	3.03%	46	55	76	152	204	143
Oct-14	0.23%	3.25%	3.02%	75	76	83	182	171	179
Nov-14	0.23%	3.25%	3.02%	86	72	79	165	158	175
Dec-14	0.24%	3.25%	3.01%	86	80	74	150	167	177
Jan-15	0.25%	3.25%	3.00%	84	60	56	139	150	162
Feb-15	0.26%	3.25%	2.99%	69	44	45	132	141	160
Mar-15	0.27%	3.25%	2.98%	62	37	43	129	145	155
Apr-15	0.27%	3.25%	2.98%	60	17	41	115	136	152
May-15	0.28%	3.25%	2.97%	55	22	42	121	127	153
Jun-15	0.28%	3.25%	2.97%	72	52	71	144	136	165
Jul-15	0.29%	3.25%	2.96%	88	68	84	160	147	173
Aug-15	0.32%	3.25%	2.93%	115	88	107	172	135	165
Sep-15	0.33%	3.25%	2.92%	141	118	138	188	143	172

HIGHEST READING
LOWEST READING

YTD PREPAYMENT SPEEDS

CPR/MO.	<8	8 - 10	10 - 13	13 - 16	16 - 20	20+	ALL
Jan-15	12.90%	10.13%	7.76%	14.31%	9.13%	8.88%	8.85%
Feb-15	16.13%	6.49%	7.20%	2.67%	7.65%	6.06%	6.48%
Mar-15	6.53%	8.10%	8.50%	2.84%	4.19%	6.12%	6.58%
Apr-15	12.62%	17.03%	7.66%	7.44%	7.13%	6.47%	7.18%
May-15	11.26%	11.53%	9.63%	6.10%	11.09%	8.23%	8.78%
Jun-15	11.53%	7.51%	7.69%	3.38%	5.37%	6.96%	7.06%
Jul-15	11.31%	10.24%	7.82%	11.34%	8.73%	7.62%	7.90%
Aug-15	8.87%	10.68%	7.91%	4.50%	9.71%	8.66%	8.52%
Sep-15	7.38%	9.73%	7.28%	2.84%	7.20%	8.11%	7.81%
Grand Total	11.03%	10.19%	7.94%	6.30%	7.82%	7.47%	7.69%

2015 monthly prepayment speeds broken out by maturity sector. Source: Colson Services

POOL AGE	<8	8 - 10	10 - 13	13 - 16	16 - 20	20+	ALL
Jan-15	30 Mos.	35 Mos.	36 Mos.	64 Mos.	53 Mos.	48 Mos.	46 Mos.
Feb-15	31 Mos.	36 Mos.	35 Mos.	64 Mos.	51 Mos.	48 Mos.	45 Mos.
Mar-15	31 Mos.	36 Mos.	35 Mos.	65 Mos.	51 Mos.	48 Mos.	45 Mos.
Apr-15	30 Mos.	36 Mos.	35 Mos.	64 Mos.	51 Mos.	48 Mos.	45 Mos.
May-15	30 Mos.	37 Mos.	35 Mos.	64 Mos.	51 Mos.	48 Mos.	45 Mos.
Jun-15	30 Mos.	37 Mos.	34 Mos.	63 Mos.	52 Mos.	48 Mos.	45 Mos.
Jul-15	31 Mos.	36 Mos.	34 Mos.	64 Mos.	52 Mos.	49 Mos.	45 Mos.
Aug-15	30 Mos.	35 Mos.	34 Mos.	64 Mos.	52 Mos.	49 Mos.	45 Mos.
Sep-15	30 Mos.	35 Mos.	34 Mos.	58 Mos.	53 Mos.	49 Mos.	45 Mos.

YEAR-TO-DATE CPR DATA

< 8 BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	7.73%	11.19%	9.36%	11.65%	23.57%
Feb-15	15.19%	9.55%	32.94%	15.92%	7.01%
Mar-15	2.40%	5.10%	9.35%	8.24%	7.92%
Apr-15	9.52%	10.45%	14.95%	2.42%	20.80%
May-15	11.07%	6.69%	13.49%	2.71%	18.69%
Jun-15	7.21%	12.14%	13.45%	6.16%	17.31%
Jul-15	25.67%	7.59%	3.02%	4.83%	9.46%
Aug-15	0.40%	17.31%	17.86%	5.66%	5.32%
Sep-15	12.87%	0.87%	5.34%	8.59%	6.56%
Grand Total	10.51%	8.94%	13.74%	7.48%	13.27%

10-13 BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	3.52%	7.46%	12.25%	12.62%	8.03%
Feb-15	2.14%	11.79%	9.71%	10.91%	7.13%
Mar-15	8.33%	11.23%	6.01%	13.17%	6.33%
Apr-15	4.72%	8.57%	15.38%	8.64%	6.11%
May-15	3.87%	12.22%	18.63%	13.28%	8.30%
Jun-15	6.94%	7.20%	10.46%	9.43%	6.90%
Jul-15	3.82%	9.11%	15.44%	11.81%	5.91%
Aug-15	3.87%	11.03%	12.48%	11.42%	6.64%
Sep-15	1.40%	9.00%	12.83%	13.78%	7.57%
Grand Total	4.31%	9.73%	12.69%	11.69%	7.00%

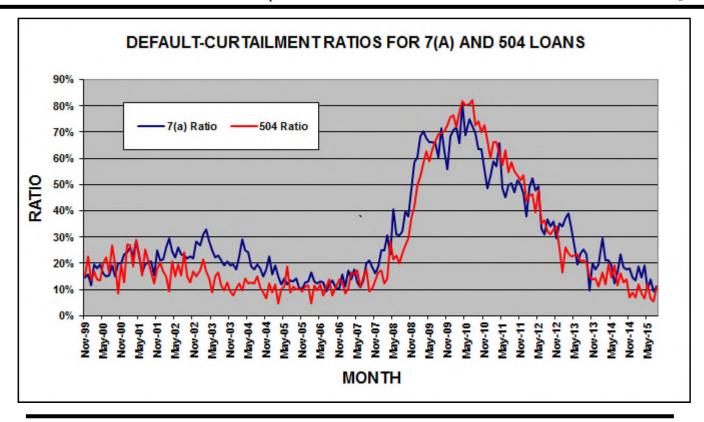
16-20 BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	2.37%	13.29%	16.18%	25.89%	3.32%
Feb-15	0.00%	11.69%	15.31%	16.72%	5.49%
Mar-15	0.00%	2.92%	13.80%	8.13%	2.39%
Apr-15	8.63%	0.00%	13.78%	4.68%	6.44%
May-15	5.40%	2.17%	22.33%	40.78%	4.64%
Jun-15	0.00%	3.05%	10.76%	2.49%	7.35%
Jul-15	1.33%	8.13%	22.80%	6.92%	9.09%
Aug-15	16.34%	9.20%	26.75%	3.78%	3.52%
Sep-15	0.00%	2.08%	14.85%	10.53%	9.47%
Grand Total	3.97%	6.36%	17.28%	14.64%	5.83%

YEAR-TO-DATE CPR DATA

8-10 BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	2.83%	26.35%	3.37%	6.43%	12.14%
Feb-15	6.62%	3.57%	4.69%	6.88%	8.31%
Mar-15	4.64%	4.41%	13.75%	1.79%	11.41%
Apr-15	14.79%	14.01%	44.06%	6.98%	9.63%
May-15	9.07%	10.90%	19.25%	9.29%	11.23%
Jun-15	4.83%	4.94%	6.10%	15.20%	9.36%
Jul-15	4.18%	7.22%	10.48%	3.65%	18.30%
Aug-15	7.29%	9.65%	9.93%	13.24%	13.40%
Sep-15	3.77%	20.70%	3.97%	6.28%	9.67%
Grand Total	6.38%	11.45%	14.26%	8.12%	11.48%

13-16 BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	0.00%	57.61%	0.00%	5.55%	2.85%
Feb-15	0.00%	0.00%	0.00%	14.69%	1.19%
Mar-15	0.00%	0.00%	0.00%	9.35%	3.02%
Apr-15	0.00%	0.00%	0.00%	0.00%	13.68%
May-15	0.00%	0.00%	20.59%	2.62%	6.75%
Jun-15	0.00%	5.73%	4.77%	0.00%	2.83%
Jul-15	0.00%	36.37%	18.05%	0.00%	2.63%
Aug-15	0.00%	3.66%	0.00%	10.62%	5.00%
Sep-15	0.00%	0.00%	0.00%	3.06%	5.00%
Grand Total	0.00%	14.83%	5.54%	5.66%	4.81%

20+ BY AGE	0-12 Mos.	13-24 Mos.	25-36 Mos.	37-48 Mos.	48+ Mos.
Jan-15	4.89%	11.90%	13.12%	13.65%	6.70%
Feb-15	3.49%	4.89%	8.46%	11.52%	5.50%
Mar-15	1.82%	7.24%	8.80%	13.93%	4.76%
Apr-15	1.69%	5.39%	7.21%	13.57%	7.55%
May-15	2.09%	7.14%	14.75%	18.86%	6.75%
Jun-15	1.41%	5.81%	14.63%	15.28%	5.42%
Jul-15	3.57%	6.11%	14.19%	13.22%	6.75%
Aug-15	4.00%	4.51%	16.76%	16.17%	8.38%
Sep-15	2.74%	9.11%	12.98%	15.23%	7.36%
Grand Total	2.84%	6.91%	12.32%	14.58%	6.61%





The nationwide leader in the valuation of SBA and USDA assets.

GLS provides valuations for:

- SBA 7(a), 504 1st mortgage and USDA servicing rights
- SBA 7(a) and 504 1st mortgage pools
- Guaranteed and non-guaranteed 7(a) loan portions Interest-only portions of SBA and USDA loans

In these times of market uncertainty, let GLS help you in determining the value of your SBA and USDA related-assets.

For further information, please contact Bob Judge at (216) 456-2480 ext. 133 or at bob.judge@glsolutions.us

Default-Curtailment Ratio

The Default-Curtailment Ratio (DCR), or the percentage of secondary loan curtailments that are attributable to defaults, can be considered a measurement of the health of small business in the U.S. GLS, with default and borrower prepayment data supplied by Colson Services, has calculated DCRs for both SBA 7(a) and 504 loans since January, 2000.

The default ratio is calculated using the following formula:

Defaults / (Defaults + Prepayments)

By definition, when the DCR is increasing, defaults are increasing faster than borrower prepayments, suggesting a difficult business environment for small business, perhaps even recessionary conditions. On the flip side, when the DCR is decreasing, either defaults are falling or borrower prepayments are outpacing defaults, each suggesting improving business conditions for small business.

Our research suggests that a reading of 20% or greater on 7(a) DCRs and 15% or greater on 504 DCRs suggest economic weakness in these small business borrower groups.

Theoretical Default Rate

Due to a lack of up-to-date default data, we attempt to estimate the current default rate utilizing two datasets that we track:

1. Total prepayment data on all SBA pools going back to 2003. This is the basis for our monthly prepayment information.

Total prepayment data on all secondary market 7(a) loans going back to 1999, broken down by defaults and voluntary prepayments. This is the basis for our monthly default ratio analysis.

With these two datasets, it is possible to derive a theoretical default rate on SBA 7(a) loans. We say "theoretical" because the reader has to accept the following assumptions as true:

1. The ratio of defaults to total prepayments is approximately the same for SBA 7(a) pools and secondary market 7(a) loans.

Fact: 60% to 70% of all secondary market 7(a) loans are inside SBA pools.

The default rate for secondary market 7(a) loans closely approximates the default rate for all outstanding 7(a) loans.

Fact: 25% to 35% of all outstanding 7(a) loans have been sold into the secondary market.

While the above assumptions seem valid, there exists some unknown margin for error in the resulting analysis. However, that does not invalidate the potential value of the information to the SBA lender community.

The Process

To begin, we calculated total SBA pool prepayments, as a percentage of total secondary loan prepayments, using the following formula:

Pool Prepay Percentage = Pool Prepayments / Secondary Loan Prepayments

This tells us the percentage of prepayments that are coming from loans that have been pooled. Next, we calculated the theoretical default rate using the following equation:

((Secondary Loan Defaults * Pool Prepay Percentage) / Pool Opening Balance) * 12

This provides us with the theoretical default rate for SBA 7(a) loans, expressed as an annualized percentage.

GLS Long Value Indices

Utilizing the same maturity buckets as in our CPR analysis, we calculate 6 separate indexes, denoted as GLS VI-1 to VI-6. The numbers equate to our maturity buckets in increasing order, with VI-1 as <8 years, VI-2 as 8-10 years, VI-3 as 10-13 years, VI-4 as 13-16 years, VI-5 as 16-20 years and ending with VI-6 as 20+ years.

The new Indices are basically weighted-average spreads to Libor, using the rolling six-month CPR for pools in the same maturity bucket, at the time of the transaction. While lifetime prepayment speeds would likely be lower for new loans entering the secondary market, utilizing six-month rolling pool speeds allowed us to make relative value judgments across different time periods.

We compare the bond-equivalent yields to the relevant Libor rate at the time of the transaction. We then break the transactions into the six different maturity buckets and calculate the average Libor spread, weighting them by the loan size.

For these indices, the value can be viewed as the average spread to Libor, with a higher number equating to greater value in the trading levels of SBA 7(a) loans.

Prepayment Calculations

SBA Pool prepayment speeds are calculated using the industry convention of Conditional Prepayment Rate, or CPR. CPR is the annualized percentage of the outstanding balance of a pool that is expected to prepay in a given period. For example, a 10% CPR suggests that 10% of the current balance of a pool will prepay each year.

When reporting prepayment data, we break it into seven different original maturity categories: <8 years, 8-10 years, 10-13 years, 13-16 years, 16-20 years and 20+ years. Within these categories we provide monthly CPR and YTD values.

In order to get a sense as to timing of prepayments during a pool's life, we provide CPR for maturity categories broken down by five different age categories: 0-12 months, 13-24 months, 25-36 months, 37-48 months and 48+ months.

As to the causes of prepayments, we provide a graph which shows prepayment speeds broken down by voluntary borrower prepayment speeds, denoted VCPR and default prepayment speeds, denoted as DCPR. The formula for Total CPR is as follows:

 $Total\ Pool\ CPR = VCPR + DCPR$

SBA Libor Base Rate

The SBA Libor Base Rate is set on the first business day of the month utilizing one-month LIBOR, as published in a national financial newspaper or website, plus 3% (300 basis points). The rate will be rounded to two digits with .004 being rounded down and .005 being rounded up.

Please note that the SBA's maximum 7(a) interest rates continue to apply to SBA base rates: Lenders may charge up to 2.25% above the base rate for maturities under seven years and up to 2.75% above the base rate for maturities of seven years or more, with rates 2% higher for loans of \$25,000 or less and 1% higher for loans between \$25,000 and \$50,000. (Allowable interest rates are slightly higher for SBAExpress loans.)

Risk Types

The various risk types that impact SBA pools are the following:

Basis Risk: The risk of unexpected movements between two indices. The impact of this type of risk was shown in the decrease in the Prime/Libor spread experienced in 2007 and 2008.

Prepayment Risk: The risk of principal prepayments due to borrower voluntary curtailments and defaults. Overall prepayments are expressed in CPR, or Conditional Prepayment Rate.

Interest Rate Risk: The risk of changes in the value of an interest-bearing asset due to movements in interest rates. For pools with monthly or quarterly adjustments, this risk is low.

Credit Risk: Losses experienced due to the default of collateral underlying a security. Since SBA loans and pools are guaranteed by the US government, this risk is very small.

Secondary Market First Lien Position 504 Loan Pool Guarantee Program

As part of the American Recovery and Reinvestment Act (AKA the Stimulus Bill), Congress authorized the SBA to create a temporary program that provides a guarantee on an eligible pool of SBA 504 first liens. The program was authorized for a period of two years from the date of bill passage – February, 2009. The eligibility of each loan is dependent on the date of the SBA Debenture funding. To be eligible, the Debenture must have been funded on or after February 17, 2009. The total guarantee allocation is \$3 Billion. HR 5297 provides for a two-year extension from the first pooling month, so that the final end date of the program was September, 2012.

The SBA began issuing pool guarantees in September, 2010 for early October settlement.

For the purposes of the program, a pool is defined as 2 or more loans. A pool must be either fixed (for life) or adjustable (any period adjustment including 5 or 10 years). If the pool is comprised of adjustable rate loans, all loans must have the same base rate (e.g. Prime, LIBOR, LIBOR Swaps, FHLB, etc.). Finally, each loan must be current for the lesser of 6 months or from the time of loan funding. Congress mandated that this be a **zero subsidy program to the SBA** (and the US taxpayer). The SBA has determined the program cost (management and expected losses) can be covered by an ongoing subsidy fee of .744% for fiscal year 2012.

SBA 504 Program and Debenture Funding

To support small businesses and to strengthen the economy Congress created the U.S. Small Business Administration (SBA) in 1953 to provide a range of services to small businesses including financing. In 1958 Congress passed the Small Business Investment Act which established what is known today as the SBA 504 loan program.

The 504 loan program provides financing for major fixed assets, such as owner-occupied real estate and long-term machinery and equipment. A 504 project is funded by a loan from a bank secured with a first lien typically covering 50% of the project's cost, a loan from a CDC secured with a second lien (backed by a 100% SBA-guaranteed debenture) covering a maximum of 40% of the cost, and a contribution of at least 10% of the project cost from the small business being financed. The SBA promotes the 504 program as an economic development tool because it is a small-business financing product that generates jobs.

Each debenture is packaged with other CDC debentures into a national pool and is sold on a monthly basis to underwriters. Investors purchase interests in debenture pools and receive certificates representing ownership of all or part of a debenture pool. SBA uses various agents to facilitate the sale and service of the certificates and the orderly flow of funds among the parties involved. The debenture sales are broken into monthly sales of 20 year debentures and bi-monthly sales of 10 year debentures.

It is the performance of these debenture pools that we track in the CPR Report on a monthly basis.

Cloud Computing and the Banking Industry

What is Cloud Computing?

For many people and organizations, the term "cloud computing" is new and unfamiliar. However, it is a technology that has been used consistently since the 1950s. Many of us use cloud computing every day without even realizing it. Whenever we login to Facebook, send an email from a Gmail account, or use an enterprise planning systems, such as Oracle and Salesforce.com, we are accessing the cloud.

In simple terms, cloud computing means using hardware and software resources delivered as a service over a network. Most frequently, the network used is the Internet. Cloud-based applications are accessed through a web browser such as Microsoft's Internet Explorer and Google's Chrome, while data is stored on secure servers in custom designed data centers located throughout the United States and around the world. Businesses that use cloud computing enjoy many advantages, including an ability to get services and employees up and running faster because there is no software that needs to be downloaded and installed. Maintenance of cloud computing applications is easier, because the software does not need to be installed on each user's computer and can be accessed from multiple computers and devices. Proper cloud deployment can also provide the benefits of cost savings, better IT services, less maintenance, and higher levels of reliability.

Cloud Banking

As the banking industry evolves and adapts to changes in the competitive environment, banks will find it advantageous to move their data into the cloud. In fact, many banks are already in the cloud and just don't realize it, with data stored on Jack Henry and FIS systems.

The combination of the cloud's low cost and high scalability will help improve customer service, day-to-day operations, regulatory compliance, and the speed at which banks can operate, while reducing technology equipment and management costs.

Quite simply, cloud banking allows financial institutions to provide a more affordable and customized dialogue with their customers, regulators, employees and business partners.

SBI Pool and IO Strip Indexes

Through a joint venture called Small Business Indexes, Inc. or SBI, GLS and Ryan ALM introduced a group of total return indexes for SBA 7a pools and I/O strips with history going back to 1/1/2000.

Why did we do this?

Indexes have been around since 1896 when the Dow Jones Industrial Average was introduced. They have grown in importance to the financial markets, whereby today \$6 trillion are invested in Index Funds throughout the world.

Continued on the following pages.

SBI Pool and IO Strip Indexes...Continued

The reasons for having investment indexes are fivefold:

- Asset Allocation Models: Asset Allocation usually accounts for over 90% of a client's total return and becomes the most critical asset decision. Such models use 100% index data to calculate their asset allocations. Bond index funds are the best representation of the intended risk/reward of fixed income asset classes.
- Transparency: Most bond index benchmarks publish daily returns unlike active managers who publish monthly or even quarterly returns usually with a few days of delinquency. Such transparency should provide clients with more information on the risk/reward behavior of their assets so there are no surprises at quarterly asset management review meetings.
- 3. **Performance Measurement:** Creates a benchmark for professional money managers to track their relative performance.
- 4. Dictates Risk/Reward Behavior: By analyzing historical returns of an index, an investor can better understand how an asset class will perform over long periods of time, as well as during certain economic cycles.
- 5. **Hedging:** An investment index can provide a means for hedging the risk of a portfolio that is comprised of assets tracked by the index. An example would be hedging a 7a servicing portfolio using the SBI I/O Strip Index.

By creating investment indexes for SBA 7a pool and IO strips, these investments can become a recognized asset class by pension funds and other large investors who won't consider any asset class in their asset allocation models that does not have a benchmark index.

An additional use for the I/O index could be to allow 7a lenders to hedge servicing portfolios that are getting large due to production and the low prepayment environment. This increase in exposure to 7a IO Strips would be welcome by IO investors who are constrained by the amount of loans that are stripped prior to being pooled.

How are the indexes calculated?

The rules for choosing which outstanding pools are eligible for both the pool and IO indexes are the following:

Pool Size:

- \$5 million minimum through 1/1/2005.
- \$10 million minimum after 1/1/2005.

Pool Structure:

- Minimum of 5 loans inside the pool.
- Minimum average loan size of \$250,000.

Pool Maturity:

- Minimum of 10 years of original maturity.
- Sub indices for 10-15 years and 15-25 year maturities.

The rules for remaining in the indices are the following:

Pool Size:

- Minimum pool factor of .25
- Factor Updates in the Indices are on the first of the month, based on the Colson Factor Report that is released in the middle of the previous month.

Pool Structure:

Minimum of 5 loans inside the pool.

We have produced two weightings for each pool in the various indexes, "Actual" and "Equal":

"Actual" weighted Indices:

- The actual original balance of each pool is used to weight the pool in the index.
- An index for all eligible pools, as well as one for 10-15 years and one for 15-25 years of original maturity.
- A total of 3 actual weighted sub-indices.

"Equal" weighted Indices:

- An original balance of \$10 million is assigned to each pool, regardless of its true size.
- An index for all eligible pools, as well as one for 10-15 years and one for 15-25 years of original maturity
- A total of 3 equal weighted sub-indices.

SBI Pool and IO Strip Indexes...Continued

This equates to a total of (6) Pool sub-indices. We will refer to them on a go-forward basis as the following:

Actual Weighting:

- All 10-25 year in original maturity pools "All Actual"
- 10-15 year in original maturity pools "Short Actual"
- 15-25 year in original maturity pools "Long Actual"

Equal Weighting:

- All 10-25 year in original maturity pools "All Equal"
- 10-15 year in original maturity pools "Short Equal"
- 15-25 year in original maturity pools "Long Equal"

Return Calculations

Each index is tracked by its value on a daily basis, as well as the components of return.

Income Component

• Daily return is calculated for the contribution of interest earned.

Mark-to-Market Component

Daily return is calculated for the contribution of Mark-To-Market changes.

Scheduled Principal Component

Daily return is calculated for the contribution of normal principal payments. Only impacts the first of the month.

Prepayed Principal Component

- Daily return is calculated for the contribution of prepayed principal payments. Only impacts the first of the month.
- We have also added a Default Principal Component and a Voluntary Principal Component that, together, equate to the Prepayed Principal Component. This also only impacts the first of the month.

Total Principal Component

Daily return is calculated for the contribution of all principal payments. Only impacts the first of the month.

The formula for Total Daily Return is as follows:

Total Daily Return = Income Return + MTM Return + Principal Return

The Principal Return is generated using the following formula:

Principal Return = Prepayed Principal Return + Scheduled Principal Return

The I/O Strip Indexes are a bit more involved, since we have to calculate the pricing multiple, as well as the breakdown between income earned and return of capital from interest accruals and payments. Here are the specific rules for the I/O Strip Indexes:

- The I/O Strip Indices utilize the same pools as the Pool Indices.
- Each pool is synthetically "stripped" upon entering the I/O Indices.
- For the equal and actual weighted indices and the maturity sub-indices (10-15 and 15-25), the pools are split into two even buckets utilizing the pool reset margins. The bucket with the higher margins we refer to as the "Upper Bucket" and the lower margin pools are in the "Lower Bucket".
- The weighted average reset margin and pool MTM is calculated for each bucket. The MTM is the same one utilized in the pool indices.
- The weighted average price of the Lower Bucket is subtracted from the Upper Bucket. The same thing is done for the weighted average reset margin.
- The MTM difference is divided by the reset margin difference, giving us the pricing multiple by maturity and weighting.
- The end result is a pricing multiple for equal and actual weighting for 10-15 year pools and 15-25 year pools, totaling (4) distinct multiples.
- Not all interest received is considered earned income, therefore interest received by the stripped pools is divided into earnings and return of
 capital, utilizing OID accounting rules.

SBI Pool and IO Strip Indexes...Continued

- The OID accounting rule create a straight-line return of capital upon entry into the index and the difference between the return of capital and
 interest received is earned income.
- Fundamentally, high prepayments can push more received interest into return of capital, thus limiting earned income. Excellent prepayment performance can generate large amounts of earned income over time.

Once the return percentages are determined for each day, it is then applied to the previous day's index level, in order to calculate the index levels for that day.

Supporting Calculations

To aid in the analysis of the indexes, we track (22) distinct calculations for each of the (6) sub-indices:

Size

Pool count and total outstanding balance

Structure

Weighted average issue date, maturity date, reset date, maturity months, remaining months, age, coupon, reset margin, strip percent (strip indexes only).

Price and Yield

Weighted average pool price, bond-equivalent yield, strip discount rate, multiple and strip pricing (strip indexes only)

Other Calculations

CPR assumption, weighted average life, modified duration, index duration, strip duration and strip return of capital average life.

SBA 504 Debenture and SBIC Debenture Indexes

While the above calculations for both the SBA 504 Debenture (SBAP) and SBIC Debenture Indexes are the same, there are differences in structure and reporting between all three SBA Programs. Here are the differences:

- SBAP's have monthly factor updates for 20 year (deemed "Long") but bi-monthly updates for 10-year paper ("Short").
- SBAP's have one new 20-year maturity each month and one 10-year every other month.
- SBICs only have 10 year debentures and they update factors only twice a year, in March and September.
- SBICs have a new debenture issued in the same months as above.
- SBICs do not amortize, whereas both SBAPs and 7a Pools do. For this reason, there is no Scheduled Principal Sub-Index.
- While 7a pools are all floating rate securities in the indexes, SBAP and SBICs debentures are all fixed rate, thus having longer durations and greater sensitivity to interest rate movements.

SBA Composite Indexes

The SBI Composite Indexes combine the four primary indexes (7a Pools, 7a IO Strips, SBAPs and SBICs) into one suite of indexes. While the actual weighted indexes use the four primary actual indexes weighted by actual size, the equal weighted indexes use the four primary equal weighted indexes also weighted by actual size. Due to the fact that the three SBA programs have grown, and continue to grow, at different rates since 1999, a static equal weighting methodology would create balancing issues over time. Therefore, we thought it best to weight the equal indexes by the actual program sizes.

The Composite indexes have all of the same sub-indexes as the four primary indexes.

SBI Rich / Cheap Analysis

The SBI Rich / Cheap Analysis is an attempt to create a "fair value" pricing model, based on 13 years of historical index pricing. We then compare the fair value price to current market levels, as represented by the GLS pricing models. We do this for 10 to 15 year maturity index-eligible pools and for 15+ maturity ones, effectively creating two separate calculations.

The first step was to create a fair value pricing algorithm for each maturity bucket, which is based on the following historical inputs:

Fundamental Inputs:

- The rolling 12-month historical CPR for all pools, including non-eligible ones, inside each maturity bucket.
- The previous month's 1 month CPR for the same population and maturity bucket.
- We used all pools, since the GLS pricing models do not differentiate between eligible and non-eligible pools.
- Weighted average pool coupon.

We chose the prepayment inputs in order to provide a directional element for pool prepayments. For instance, when the 1 month CPR is lower than the 12 month one, than the trend for prepayments is lower and when it is higher, the trend is toward higher prepayments.

We added the coupon input to add market level interest rates to the analysis. Since we are only using floating-rate SBA 7a pools that reset monthly or quarterly, this input is a proxy for the base rate on the pricing date.

Structural Inputs:

- Weighted average pool net margin to the base rate.
- Weighted average remaining months to maturity.
- Weighted average pool age.

The structural inputs put the weighted average index price into context, based on the amount and number of interest payments into the future.

The algorithm will be re-calibrated on an annual basis with the addition of the previous year's pricing data and then applied to the next year's pricing data to calculate the fair value price.

Methodology

We used multiple regression for the analysis and achieved an r-squared of .80 for the 10-15 year maturity bucket and .95 for the 15+ maturity bucket. We then subtracted the fair value price from the index pricing level to find the difference between these two pricing elements. Basically, when the index pricing level is higher than the fair value price, the index price is, to varying degrees, "rich" and when it is below the fair value price, it is "cheap".

Additionally, we determined that a "Fair Value Band" was necessary for the analysis. We decided that when the two pricing components are within +.50 and -.50 of each other (green portion of the accompanying graph), the index pricing level was fairly valued as per the model. When the index price rose above the fair value band, the market for SBA pools is considered "Rich", or expensive compared to historical pricing and when it is below the band, it is "Cheap" or inexpensive as compared to our fair value price.

SBIC Debenture Program

A Small Business Investment Company (SBIC) is a privately owned and operated company that makes long-term investments in American small businesses and is licensed by the United States Small Business Administration (SBA).

A principal reason for a company to become licensed as an SBIC is access to financing (Leverage) provided by SBA. In addition, banks and Federal savings associations (as well as their holding companies) have the ability to own or to invest in SBICs and thereby to own indirectly more than 5 percent of the voting stock of a small business, 1 and can receive Community Reinvestment Act credit for SBIC investments. Banks and their holding companies also receive exemptions from certain capital charge regulations and lending "affiliation" rules under the Gramm-Leach-Bliley Act. A business seeking a U.S. Government contract that is a set aside for small businesses does not lose its status as a small business by reason of a control investment by an SBIC. Many Business Development Companies (BDCs) also have formed SBIC "subsidiaries" as part of their business strategies.

The SBIC Program has undergone significant changes since its creation in 1958. The original Program permitted only Debenture Leverage. The Small Business Equity Enhancement Act of 1992 drastically changed the SBIC program. It created a new form of SBA Leverage known as "Participating Securities" (essentially preferred limited partnership interests); increased the amount of Leverage available to an SBIC to \$90 million (which subsequently was indexed to reflect changes in the cost of living since March 31, 1993 and then modified in 2009 to be \$150 million); required minimum private capital of \$10 million for SBICs using Participating Securities and \$5 million for SBICs using Debentures; provided for stricter SBA licensing standards; and enacted other changes to make the program more consistent with the private venture capital industry. Unlike the Debenture program which requires periodic interest payments, the Participating Securities program required an SBIC to pay SBA a prioritized payment (preferred return) and a profit share when the SBIC realized profits. As a consequence, the Participating Securities program was designed to permit investing in equity securities whether or not those securities had a current pay component. This new program resulted in a large expansion of the number of SBIC licenses granted. Following the burst of the "technology bubble" in 2002, the Administration decided there was no longer a need for an equity SBIC program and determined that the existing participating securities program would result in significant losses to SBA. Accordingly, SBA terminated the program, and that beginning on October 1, 2004, stopped issuing commitments to use participating securities leverage and licensing new participating securities SBICs.

SBA currently provides financing (called "Leverage") to SBICs in the form of "Debentures." Debentures are unsecured ten-year loans issued by the SBIC that have interest-only payable semi-annually. Most Debentures bear a temporary interest rate based on LIBOR. The interest rate on these Debentures is fixed when the SBA pools Debentures from various SBICs and sells them to the public, with the pooled Debentures having a 10-year maturity from the sale date.

It is these debentures that are analyzed in the CPR Report.

Since SBIC Debentures do not have an amortization component, I have added a different CPR calculation inside the CPR Report.

I call it the "Amortization Equivalent CPR" (AECPR). Since the principal balance does not amortize for SBIC debentures, it makes it difficult to compare them, from a pre-payment perspective, to amortizing assets, such as SBA 7a and 504 debenture pools.

The AECPR assumes the asset amortizes and looks at the beginning and ending balance to calculate the CPR. The calculation uses the exact MBA (Mortgage Banker's Association) standard formula for CPR.

Because of the amortization assumption, the AECPR is always lower than the normal CPR calculation for SBIC pools, and can go below zero if the principal reduction does not fully offset the assumed amortization amount.



Phone: 216-456-2480

Web Site: www.govloansolutions.com E-mail: info@govloansolutions.com

Government Loan Solutions

1741 Tiburon Drive Wilmington, NC 28403

Our Staff

Bob Judge, Editor Jordan Blanchard Scott Evans Patrick Kelley Tommy McGeough

CPR Report Staff:

Robert E. Judge II, Production Assistant

www.govloansolutions.com

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