C. N. M. V.
Dirección General de Mercados e Inversores
C/ Miguel Ángel 11
Madrid

COMUNICACIÓN DE HECHO RELEVANTE

CIBELES III FTPYME, FONDO DE TITULIZACIÓN DE ACTIVOS
Subida y confirmación de las calificaciones de los bonos BSA y BCA por parte de Moody´s.

Titulización de Activos, Sociedad Gestora de Fondos de Titulización, S.A. comunica el siguiente Hecho Relevante:

Respecto al fondo de referencia, adjuntamos nota de prensa publicada por Moody's con fecha 9 de Febrero 2011, donde se comunican las siguientes actuaciones:

- Serie BSA, de **Aa2 (sf)** a **Aaa (sf)**
- Serie BCA, confirma calificación **Aaa (sf)**

En Madrid a 9 de Febrero de 2011

Ramón Pérez Hernández
Director General

MOODY'S
INVESTORS SERVICE

Rating Action: **Moody's upgrades senior notes in CIBELES III FTPYME, Spanish SME ABS**

Global Credit Research - 09 Feb 2011

EUR59 million of rated securities affected

Frankfurt am Main, February 09, 2011 --

Moody's Investors Service has today taken the following rating actions on the long-term credit ratings of the following notes issued by CIBELES III FTPYME, Fondo de Titulización de Activos (CIBELES III):

....EUR43.2M BSA Bond, Upgraded to Aaa (sf); previously on Dec 22, 2003 Definitive Rating Assigned Aa2 (sf)

....EUR172.8M BCA Bond, Confirmed at Aaa (sf); previously on Jul 5, 2010 Aaa (sf) Placed Under Review for Possible Downgrade

Today's rating action concludes the review for possible downgrade of the BCA Notes, which was initiated on 5 July 2010 following Moody's review of the Aaa ratings of the BCA notes, which are guaranteed by the Kingdom of Spain.

RATINGS RATIONALE

Today's rating actions take into consideration the better-than-expected performance of the collateral and the significant increase in credit enhancement under the senior notes.

Moody's analysis also reflects the credit quality of the underlying portfolio of SME loans, from which Moody's determined its cumulative default and recovery rate, and its volatility assumption as well as the transaction structure, as assessed under Moody's cash flow analysis. The expected cumulative default rate and volatility are the two key parameters Moody's uses to calibrate its default distribution curve, which in turn is used in the cash flow model that is used to rate European ABS transactions.

PERFORMANCE

Historically, this transaction has shown consistently better performance than the Spanish SME index published by Moody's ("Spanish SME November 2010 Indices," January 2011). As of December 2010, 1% of the portfolio was more than 90 days delinquent, compared with an index of 1.8%. The reserve fund was 21.1% of the notes, as of November 2010.

KEY REVISED ASSUMPTIONS: CUMULATIVE DEFAULT, VOLATILITY AND RECOVERY RATE

Moody's has reassessed its lifetime default expectation for CIBELES III's collateral pool, factoring in the strong collateral performance to date, but also taking into account any likely performance deterioration of the pool in the current down cycle. In doing so, Moody's took into account the transaction's exposure to the real-estate sector, either through security in the form of a mortgage, or debtors operating in real estate.

Given the real-estate exposures and its outlook, Moody's has assumed the default probability of the SME debtors to an equivalent rating in the single-B range for the debtors operating in real estate and in the low Ba-range for the non-real-estate debtors. At the same time, Moody's estimated the remaining weighted-average life of the portfolio to be 3.7 years. The rating agency used a Monte Carlo simulation to derive the gross default distribution, resulting in a mean default of 11% of current portfolio balance and a coefficient of variation of 60% (unchanged). Moody's DP assumption relates to the typical 90-day past due default definition, which is different from the actual default definition in this transaction (12-month past due). Moody's recovery assumption is consistent with the default definition reflected in its DP assumption. Expressed as a percentage of the original portfolio balance plus replenishment, Moody's revised cumulative mean default rate is 3.8 % (assuming cumulative defaults on a 90-day basis of 2.7% of original balance plus replenishment). This compares to an initial mean default of 2.1% of the original balance at closing.

The average recovery-rate assumption was increased to 65% (a stochastic recovery rate), compared with 35% assumed at closing. This estimate was based on actual recoveries observed in the transaction and the current collateralisation level. Indeed, each securitised loan is mortgage-backed and the average loan-to-value (LTV) ratio for the pool is 32%.

The constant prepayment rate (CPR) assumption has been lowered to 5%, but Moody's also performed sensitivity tests in the 0%-10% range.

Moody's used its excel based cash-flow model Moody's ABSROM™ as part of its quantitative analysis of the transaction. Moody's ABSROM™ model enables users to model various features of a standard European ABS transaction -- including the specifics of the default distribution of the assets, their portfolio amortisation profile, yield, or recoveries, as well as the specific priority of payments, triggers, swaps and reserve funds on the liability side of the ABS structure. Moody's ABSROM™ User Guide, available on Moody's website, covers the functionality of the model and provides a comprehensive index of the user inputs and outputs. MOODY'S CDOROMv2.8™ was used to estimate the default distribution.

In summary, Moody's concluded that the combination of robust performance and current level of credit enhancement of 50.9% below series B resulted in a confirmation and an upgrade for the BCA and BSA notes, respectively. The rating of Class BCA, ranking pari passu with Class BSA, has been confirmed at Aaa (sf), which is its intrinsic rating in the absence of the guarantee from the Kingdom of Spain (rated Aa1, under review for possible downgrade). In its analysis, Moody's considered the possible amortisation of the reserve fund by half of its current amount.

Moody's analysed various sensitivities of cumulative default rates to test the robustness of its revised ratings. For instance, Moody's observed that the quantitative/model-indicated rating outcome of classes BCA and BSA would remain consistent with their confirmed/revised rating if the mean default assumptions increased up to 67% of its revised value (18.4% vs. 11% base case assumption). The rating of Class C is not impacted by the change in assumptions, given the levels of credit enhancement.

TRANSACTION

CIBELES III, which closed in December 2003, is backed by loans granted to SMEs originated by Caja Madrid (A1/P-1, on review for possible downgrade). In December 2010, the portfolio consisted of 1,654 loans. Most of the loans were originated between 1999 and 2004. The transaction started to amortise after a two-year revolving period, which ended in November 2005. The concentration in the "Building and Real Estate" sector has increased to 54.1% of the portfolio as of December 2010, up from 42.3% of the portfolio at closing.

Moody's ratings address the expected loss posed to investors by the legal final maturity of the notes. Moody's ratings address only the credit risks associated with the transaction. Other non-credit risks have not been addressed, but may have a significant effect on yield to investors.

The principal methodologies used in this rating were Refining the ABS SME Approach: Moody's Probability of Defaults Assumptions in the Rating Analysis of Granular Small and Mid-Sized Enterprise portfolios in EMEA, published in March 2009 and Moody's Approach to Rating Granular SME Transactions in Europe, Middle East and Africa, published in June 2007.

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

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

REGULATORY DISCLOSURES

The rating has been disclosed to the rated entity or its designated agents and issued with no amendment resulting from that disclosure.

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

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

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

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

Frankfurt am Main
Ludovic Thebault
Associate Analyst
Structured Finance Group
Moody's Deutschland GmbH
JOURNALISTS: 44 20 7772 5456
SUBSCRIBERS: 44 20 7772 5454

Paris
Carole Gintz
VP - Senior Credit Officer
Structured Finance Group
Moody's France SAS
JOURNALISTS: 44 20 7772 5456
SUBSCRIBERS: 44 20 7772 5454

Moody's Deutschland GmbH
An der Welle 5
Frankfurt am Main 60322
Germany
JOURNALISTS: 44 20 7772 5456
SUBSCRIBERS: 44 20 7772 5454

professional adviser.