

C. N. M. V.  
Dirección General de Mercados e Inversores  
C/ Edison 4  
Madrid

### **COMUNICACIÓN DE HECHO RELEVANTE**

#### **TDA CAM 7, FONDO DE TITULIZACIÓN DE ACTIVOS Actuaciones sobre las calificaciones de los bonos por parte de Standard & Poor's.**

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

I. Respecto al fondo de referencia, adjuntamos nota de prensa publicada por Standard & Poor's, con fecha 25 de febrero de 2015, donde se llevan a cabo las siguientes actuaciones:

- Bono A2, a **BBB (sf)** desde **A (sf)**.
- Bono A3, a **BBB (sf)** desde **A (sf)**.
- Bono B, confirmado como **D (sf)**.

En Madrid, a 27 de febrero de 2015

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# RatingsDirect®

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## Various Rating Actions Taken In Spanish RMBS Transactions TDA CAM 7, 8, And 9 Following Criteria Updates

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### OVERVIEW

- We have reviewed TDA CAM 7, 8, and 9 by conducting our credit and cash flow analysis under our updated Spanish RMBS criteria and our updated criteria for rating single-jurisdiction securitizations above the sovereign foreign currency rating.
- Our updated RAS criteria constrain our ratings on TDA CAM 7's class A2 and A3 notes, and TDA CAM 8's class A notes.
- Following our review, we have taken various rating actions in these three transactions.
- TDA CAM 7, 8, and 9 are Spanish RMBS transactions, which closed between October 2006 and July 2007 and securitize first-ranking mortgage loans. Banco CAM S.A.U., now merged with Banco de Sabadell, originated the pool, which comprises loans granted to prime borrowers secured over owner-occupied residential properties, mainly located in Valencia.

PARIS (Standard & Poor's) Feb. 25, 2015--Standard & Poor's Ratings Services today took various credit rating actions in TDA CAM 7, Fondo de Titulizacion de Activos, TDA CAM 8, Fondo de Titulizacion de Activos, and TDA CAM 9, Fondo de Titulizacion de Activos.

Specifically, we have:

- Lowered our ratings on TDA CAM 7's class A2 and A3 notes, TDA CAM 8's

- class A notes, and TDA CAM 9's class A1, A2, and A3 notes; and
- Affirmed our ratings on TDA CAM 7's class B notes, and the class B, C, and D notes in TDA CAM 8 and TDA CAM 9 (see list below).

Upon publishing our updated criteria for Spanish residential mortgage-backed securities (RMBS criteria) and our updated criteria for rating single-jurisdiction securitizations above the sovereign foreign currency rating (RAS criteria), we placed those ratings that could potentially be affected "under criteria observation" (see "Italian And Spanish RMBS And Covered Bond Program Ratings Placed Under Criteria Observation," and "Italy And Spain RMBS Methodology And Assumptions," both published on Sept. 18, 2014, and "Methodology And Assumptions For Ratings Above The Sovereign--Single-Jurisdiction Structured Finance," published on Sept. 19, 2014).

Following our review of these transactions, our ratings that could potentially be affected by the criteria are no longer under criteria observation.

Today's rating actions follow our credit and cash flow analysis of the most recent transaction information that we have received as of each transaction's latest payment date. Our analysis reflects the application of our RMBS criteria and our RAS criteria.

Under our RAS criteria, we applied a hypothetical sovereign default stress test to determine whether a tranche has sufficient credit and structural support to withstand a sovereign default and so repay timely interest and principal by legal final maturity.

Our RAS criteria designate the country risk sensitivity for RMBS as 'moderate'. Under our RAS criteria, these transactions' notes can therefore be rated four notches above the sovereign rating, if they have sufficient credit enhancement to pass a minimum of a "severe" stress. However, as not all of the conditions in paragraph 48 of the RAS criteria are met, we cannot assign any additional notches of uplift to the ratings in these transactions (see "Understanding Standard & Poor's Rating Definitions," published on June 3, 2009 for our definitions of severe and extreme levels of economic stress).

As our long-term rating on the Kingdom of Spain is 'BBB', our RAS criteria cap at 'A+ (sf)' the maximum potential rating for all classes of notes in the three transactions.

All three transactions feature interest deferral triggers, which are based on the ratio of cumulative gross collateral defaults to the original pool balance. These triggers protect the more senior classes of notes in stressful scenarios. These triggers have all been breached.

Credit enhancement has increased slightly for the senior notes in TDA CAM 7 and 8, and decreased slightly for the senior notes in TDA CAM 9, since our previous reviews (see "Ratings Lowered In Spanish RMBS Transaction TDA CAM 7 Following Performance Review," published on Dec. 20, 2013, and "Ratings

Affirmed And Removed From CreditWatch Neg In Spanish RMBS Deals TDA CAM 8 And 9 For Counterparty Reasons," published on July 12, 2013).

Class	Available credit enhancement (%)		
	--Transaction--		
	7	8	9
A		4.4	
A1			2.0
A2	7.0		2.0
A3	7.0		2.0
B	0.0	0.0	0.0
C		0.0	0.0
D		0.0	0.0

The transactions feature amortizing reserve funds, which have been fully depleted in all three transactions.

Cumulative defaults are on average higher for these three transactions than our Spanish RMBS index (see "Spanish RMBS Index Report Q2/Q3 2014: Delinquencies Continue To Rise As The Housing Market Slowly Recovers," published on Jan. 2, 2015). Defaults are defined as mortgage loans in arrears for more than 12 months in these transactions. Prepayment levels remain low and the transactions are unlikely to pay down significantly in the near term, in our opinion.

	Severe delinquencies (%)	Cumulative defaults (%)
TDA CAM 7	1.95	11.48
TDA CAM 8	1.37	9.70
TDA CAM 9	3.44	14.00

After applying our RMBS criteria to these transactions, our credit analysis results generally show a decrease in the weighted-average foreclosure frequency (WAFF) and an increase in the weighted-average loss severity (WALS) for each rating level.

The decreases in the WAFF are mainly due to our revised treatment of seasoned loans, geographic concentrations, jumbo loans, and arrears under our revised Spanish RMBS criteria. The increases in the WALS are mainly due to the application of our revised market value decline assumptions. The overall effect is an increase in the required credit coverage for each rating level in each transaction.

Following the application of our RAS criteria and our RMBS criteria, we have determined that our assigned rating on each class of notes in these transactions should be the lower of (i) the rating as capped by our RAS criteria and (ii) the rating that the class of notes can attain under our RMBS criteria. Our ratings on TDA CAM 7's class A2 and A3 notes, and TDA CAM 8's class A notes are constrained by the rating on the sovereign.

TDA CAM 7's class A2 and A3 notes, and TDA CAM 8's class A notes benefit from enough credit enhancement to achieve a rating above the Spanish sovereign rating under our RMBS criteria, but not enough to withstand the severe stress under our RAS criteria. Consequently, our ratings on these classes of notes cannot exceed our rating on the Spanish sovereign. We have therefore lowered to 'BBB (sf)' from 'A (sf)' our ratings on TDA CAM 7's class A2 and A3 notes, and TDA CAM 8's class A notes.

Our credit and cash flow results indicate that the available credit enhancement for TDA CAM 9's class A1, A2, and A3 notes is commensurate with 'BB+ (sf)' ratings. We have therefore lowered to 'BB+ (sf)' from 'BBB (sf)' our ratings on these classes of notes.

TDA CAM 7's class B notes, and the class B, C, and D notes in TDA CAM 8 and TDA CAM 9 are experiencing ongoing interest shortfalls because of a lack of liquidity, in most cases because of interest deferral trigger breaches. We have therefore affirmed our 'D (sf)' ratings on these classes of notes.

We also consider credit stability in our analysis (see "Methodology: Credit Stability Criteria," published on May 3, 2010). To reflect moderate stress conditions, we adjusted our WAFF assumptions by assuming additional arrears of 8% for one-year and three-year horizons. This did not result in our rating deteriorating below the maximum projected deterioration that we would associate with each relevant rating level, as outlined in our credit stability criteria.

In our opinion, the outlook for the Spanish residential mortgage and real estate market is not benign and we have therefore increased our expected 'B' foreclosure frequency assumption to 3.33% from 2.00%, when we apply our RMBS criteria, to reflect this view (see "Outlook Assumptions For The Spanish Residential Mortgage Market," published on Sept. 18, 2014). We base these assumptions on our expectation of modest economic growth, continuing high unemployment, and house prices leveling off in 2015.

On the back of improving but still depressed macroeconomic conditions, we don't expect the performance of the transactions in our Spanish RMBS index to improve in 2015.

We expect severe arrears in the portfolios to remain at their current levels, as there are a number of downside risks. These include weak economic growth, high unemployment, and fiscal tightening. On the positive side, we expect interest rates to remain low for the foreseeable future.

TDA CAM 7, 8, and 9 are Spanish RMBS transactions, which closed between October 2006 and July 2007. The transactions securitize first-ranking mortgage loans that Banco CAM S.A.U., which has merged with Banco de Sabadell, originated. The pools comprise loans granted to prime borrowers secured over owner-occupied residential properties, mainly in Valencia.

STANDARD & POOR'S 17G-7 DISCLOSURE REPORT

SEC Rule 17g-7 requires an NRSRO, for any report accompanying a credit rating relating to an asset-backed security as defined in the Rule, to include a description of the representations, warranties, and enforcement mechanisms available to investors and a description of how they differ from the representations, warranties, and enforcement mechanisms in issuances of similar securities. The Rule applies to in-scope securities initially rated (including preliminary ratings) on or after Sept. 26, 2011.

If applicable, the Standard & Poor's 17g-7 Disclosure Reports included in this credit rating report are available at <http://standardandpoorsdisclosure-17g7.com>.

#### RELATED CRITERIA AND RESEARCH

##### Related Criteria

- Global Framework For Assessing Operational Risk In Structured Finance Transactions, Oct. 9, 2014
- Methodology And Assumptions For Ratings Above The Sovereign--Single-Jurisdiction Structured Finance, Sept. 19, 2014
- Italy And Spain RMBS Methodology And Assumptions, Sept. 18, 2014
- Europe Asset Isolation And Special-Purpose Entity Criteria--Structured Finance, Sept. 13, 2013
- Counterparty Risk Framework Methodology And Assumptions, June 25, 2013
- Methodology: Credit Stability Criteria, May 3, 2010
- Understanding Standard & Poor's Rating Definitions, June 3, 2009

##### Related Research

- Spanish RMBS Index Report Q2/Q3 2014: Delinquencies Continue To Rise As The Housing Market Slowly Recovers, Jan. 2, 2015
- Standard & Poor's Ratings Definitions, Nov. 20, 2014
- Credit Conditions: The Eurozone Crawls Into 2015 With Weak Momentum, Dec. 4, 2014
- Outlook Assumptions For The Spanish Residential Mortgage Market, Sept. 18, 2014
- Under Threat Of A Triple Dip, The ECB Takes Action, Sept. 15, 2014
- Low Interest Rates Are Underpinning Europe's House Price Recovery, July 28, 2014
- European Structured Finance Scenario And Sensitivity Analysis 2014: The Effects Of The Top Five Macroeconomic Factors, July 8, 2014
- Global Structured Finance Scenario And Sensitivity Analysis: Understanding The Effects Of Macroeconomic Factors On Credit Quality, July 2, 2014
- Ratings Lowered In Spanish RMBS Transaction TDA CAM 7 Following Performance Review, Dec. 20, 2013
- Ratings Affirmed And Removed From CreditWatch Neg In Spanish RMBS Deals TDA CAM 8 And 9 For Counterparty Reasons, July 12, 2013

*Various Rating Actions Taken In Spanish RMBS Transactions TDA CAM 7, 8, And 9 Following Criteria Updates*

**RATINGS LIST**

Class	To	Rating	From
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TDA CAM 7, Fondo de Titulizacion de Activos  
€1.75 Billion Mortgage-Backed Floating-Rate Notes

**Ratings Lowered**

A2	BBB (sf)	A (sf)
A3	BBB (sf)	A (sf)

**Rating Affirmed**

B	D (sf)
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TDA CAM 8, Fondo de Titulizacion de Activos, and  
€1.713 Billion Residential Mortgage-Backed Floating-Rate Notes

**Rating Lowered**

A	BBB (sf)	A (sf)
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**Ratings Affirmed**

B	D (sf)
C	D (sf)
D	D (sf)

TDA CAM 9, Fondo de Titulizacion de Activos  
€1.515 Billion Residential Mortgage-Backed Floating-Rate Notes

**Ratings Lowered**

A1	BB+ (sf)	BBB (sf)
A2	BB+ (sf)	BBB (sf)
A3	BB+ (sf)	BBB (sf)

**Ratings Affirmed**

B	D (sf)
C	D (sf)
D	D (sf)

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