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Terms of Use

NAIC 2014 RMBS/CMBS STRUCTURED SECURITIES REPORT

The National Association of Insurance Commissioners (NAIC) is providing a proprietary report with information regarding non-agency Residential Mortgage-Backed Securities (“RMBS”) and Commercial Mortgage-Backed Securities (“CMBS”), hereafter known as the “RMBS/CMBS Structured Securities Report” or “Report.” The NAIC owns and retains all rights to the data within the RMBS/CMBS Structured Securities Report.

THIS RMBS/CMBS STRUCTURED SECURITIES VALUATION/REPORT HAS BEEN DEVELOPED FOR REGULATORY COMPLIANCE PURPOSES ONLY. IT SHOULD NOT BE USED AS INVESTMENT ADVICE; IS NOT INTENDED AND SHOULD NOT BE USED AS THE BASIS UPON WHICH TO BUY OR SELL ANY SECURITY; DOES NOT TAKE INTO ACCOUNT THE SPECIFIC INVESTMENT OBJECTIVES, FINANCIAL SITUATION AND/OR PARTICULAR NEEDS OF ANY PERSON OR ENTITY; DOES NOT CONSTITUTE AN OFFER OR AN INVITATION TO MAKE AN OFFER TO BUY OR SELL ANY SECURITIES; DOES NOT REPRESENT A BASIS FOR TRADING OR A RECOMMENDATION RELATING TO ANY SECURITIES. THIS RMBS/CMBS STRUCTURED SECURITIES REPORT CONTAINS INFORMATION THAT IS SUBJECT TO CHANGE AND MAY NOT BE CURRENT AS OF THE DATE HEREOF, AND NEITHER LICENSOR NOR ANY OTHER PARTY HAS A DUTY TO UPDATE ANY INFORMATION IN THE REPORT.

I understand that following confirmation of my payment of the Structured Securities modeling assessment fee, I will be provided an ID and password to access the 2014 RMBS/CMBS Structured Securities Report.

My use of an ID and password to access the RMBS/CMBS Structured Securities Report constitutes my agreement to the terms and conditions of this agreement without limitation or exception. I must agree to these Terms of Use in order to be able to access the Report. As the owner of the Structured Securities Report, the NAIC grants to me a non-exclusive, non-transferable license to use the file according to the terms and conditions stated herein.

Insurer Limitations on Use

By clicking on the ‘Agree’ button, as an insurer, I agree that I have paid the required Structured Securities modeling assessment to the NAIC and I agree to use the data within the 2014 RMBS/CMBS Structured Securities Report only for non-commercial, informational use. I shall not market, sell, share, transfer or otherwise distribute this data in any manner or form, including on a local area network, to any other person that is not my insurance company affiliate. Notwithstanding the foregoing, I shall have the right to reproduce the information and data (in whole or in part, in any medium or format) for my company’s internal use and to store the information and data in one or more databases for interrogation, analysis, manipulation, compilation, report preparation or later retrieval. Violation of these terms will result in termination of this license and may result in legal action.
Third-Party Administrator (TPA) Limitations on Use

Third-party administrators (TPAs) are required to sign a hardcopy Terms of Use Agreement and return it to the NAIC; to provide an insurance company client list to the NAIC; and to pay an access fee prior to accessing client insurance companies’ RMBS/CMBS Structured Securities Reports. TPAs agree to use the data within each Report only for their insurance company clients that hold non-agency RMBS or CMBS securities in their portfolio and only to assist in the preparation of insurance company client regulatory financial filings. Even after signing the Terms of Use as a permitted user, TPAs must obtain written authorization from the NAIC to use a RMBS/CMBS Structured Securities Report for each insurance company client. Permission will only be granted after the insurer has paid its assessed modeling fee to the NAIC. The TPA is restricted from using the RMBS/CMBS Structured Securities Report for any insurance company client that has not paid its 2014 Structured Securities modeling fee or assessment to the NAIC. In addition, the TPA agrees not to market, sell, share, transfer or otherwise distribute this data in any manner or form. Violation of these terms will result in termination of this license and may result in legal action.

No Warranties/Limitation of Liability

NEITHER THE NAIC NOR ITS 2014 DATA MODELING AGENTS HAVE MADE ANY WARRANTY OR PROMISE, EITHER EXPRESS OR IMPLIED, WITH RESPECT TO THE RMBS/CMBS STRUCTURED SECURITIES REPORT PROVIDED HEREIN AND EXPRESSLY DISCLAIM THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE. NEITHER THE NAIC NOR ITS 2014 DATA MODELING AGENTS SHALL BE LIABLE FOR AND I EXPRESSLY WAIVE ANY CLAIM FOR DIRECT OR INDIRECT LOSS, COST, OR INJURY, WHETHER BASED IN CONTRACT, TORT OR OTHERWISE, SUFFERED BY ME AS A RESULT OF RELIANCE ON OR USE OF THE DATA CONTAINED IN THE RMBS/CMBS STRUCTURED SECURITIES REPORT.

Governing Law/Forum

The laws of the State of New York shall be applicable to the interpretation of these terms, without regard to any conflict of law provisions. I hereby waive the right to a trial by jury for any disputes arising under this Agreement.

Change in Terms of Agreement

The NAIC reserves the right to revise these Terms of Use at any time by updating this posting.
Introduction to Structured Securities

In 2009 members of the National Association of Insurance Commissioners (NAIC) approved the recommendation of the Valuation of Securities (E) Task Force and Financial Condition (E) Committee to create a new modeling and assessment process for non-agency residential mortgage-backed securities (RMBS). This assessment process will assist state regulators in ultimately determining the Risk Based Capital (RBC) requirements for the non-agency RMBS/CMBS owned by U.S. insurers at the end of each year. For each of the RMBS/CMBS CUSIPs, the new model will produce prices based upon expected losses for each NAIC designation. Insurers will map the carrying value of each RMBS to these amounts to determine the appropriate NAIC designation and accompanying RBC requirements.

Members of the NAIC have also authorized an assessment of the costs associated with this project to those U.S. insurers that own non-agency RMBS/CMBS subject to the modeling process. An assessment of the costs associated with this project are billed to the insurance companies owning non-agency RMBS/CMBS CUSIPs subject to the new modeling and assessment process, based on Schedule D information from December 31st, statutory annual statement filings.

The NAIC will include all securities that have been identified as non-agency RMBS/CMBS held by insurers as of the Annual and 2nd Quarter in the first file delivery in late December annually. Securities that were identified after the 2nd Quarter cut-off will be analyzed and released in a similar format on late January.

System Hours and Support

The Structured Securities service is available at https://avsplus.naic.org/avsplus/pages/public/home.jsf. Due to the nature of the Internet, the system is available nearly 24 hours a day, seven days a week. However, the official system hours are 8 a.m. to 5 p.m. CST. The system is not available during periods of scheduled maintenance and updating, which is generally the first Saturday of each month. Maintenance and update periods are posted on the STS Bulletin Board to let you know when the database will be unavailable.

System support is provided by the NAIC Help Desk, the AVS Administrator, and other NAIC staff as necessary. Support hours are Monday through Friday, 8:00 a.m. to 5:00 p.m. CST, excluding holidays and/or other periods of time when the NAIC offices may be closed.

The NAIC has established a help line to receive and respond to questions regarding the RMBS modeling process, instructions and invoices. By calling the NAIC at (816) 783-8300 and selecting the RMBS prompt, callers can access NAIC staff representatives for assistance with: (1) purchasing access to the RMBS/CMBS file; (2) questions related to user id and password for access to the file; (3) questions related to invoices, or to remit payment by credit card or by wire transfer; or (4) questions regarding the established policy of the Valuation of Securities (E) Task Force and its impact on NAIC security designations. For questions related to statutory accounting and/or the impact of the RMBS/CMBS modeling and assessment process on RBC, please contact the QA Help Line at (816) 783-8400 and select the RMBS option. Additional information and answers to frequently asked questions are posted at the NAIC’s website at http://www.naic.org/index_structured_securities.htm.
Contact Information

Questions about becoming an STS subscriber, or questions regarding your company’s portfolio and billing should be directed to:

National Association of Insurance Commissioners
AVS Administrator
1100 Walnut Street, Suite 1500
Kansas City, MO 64106
Phone: (816) 783-8300
E-mail: securitiessupport@naic.org

For assistance with your ID or password, please have the following information available: AVS+ User ID and password, NAIC company code, system contact name, and type of browser used. Then contact:

Help Desk
(816) 783-8500
E-mail: help@naic.org

System Requirements

AVS+ performs optimally under Microsoft Internet Explorer version 7 and version 8, and under the two most current major versions of Firefox (i.e., 8.x and 9.x). Customers will not be required to load any additional software onto their PCs.

Users must have a valid ID and password to use the system. To obtain an AVS+ User ID and password, please contact the AVS Administrator at (816) 783-8300.

Third Party Administrator Service

A Third-Party Administrator (TPA) is defined as an individual or group of individuals that are in the business of advising, managing, or procuring Structured Securities data for insurance companies’ investment portfolios. A TPA is allowed to create and maintain portfolios, in the name of one or more insurance companies. All clients of TPAs must specify the TPA to which they are granting access.
AVS+ Home Page & Logging In

To access the AVS+ home page, open a browser and enter https://avsplus.naic.org/avsplus/pages/public/home.jsf.

NAIC Log In Window

Enter your AVS+ ID User Name and Password. The password is case sensitive and will appear as asterisks (*) when entered.

After the User Name and Password are successfully entered, read and agree to all terms and conditions by selecting the check box beside the By Checking the box to the left your agree to all terms and conditions label.

Select the Login Button.
First Time Logging In

The first time you log in, the system will prompt you to select challenge questions and provide answers. After established, if you forget your password and select the Forget Your Password hyperlink, the system will prompt you to enter the case sensitive answers to the challenge questions you previously selected.

If you provide the correct case sensitive answers, the system will display the change password prompts. If you are not able to provide the case sensitive answers, contact the NAIC Help Desk by email, help@naic.org or phone 816.783.8500 for additional assistance.

Using Structured Securities

After successfully logging in, you will see the below screen.
Terms of Use

The Terms of Use will appear the first time you select a Structured Securities process each day. You will need to review and accept the Terms of Use to continue to the page you requested.

CUSIP Search - Add to Portfolio and Submit for Consideration

To complete a CUSIP search, select Searches > Search Modeled Securities
Enter the security number in the CUSIP field and select Search.

Select the security.

Select Add to Portfolio(s)

This message will display if the security you are searching for has not been selected to be modeled. To request it to be modeled, simply add the security to your portfolio.
Portfolio Management

When adding a security to your portfolio, specify the company(s) to add the security to if you are associated to more than one company, then Save.

Select Portfolios to view your company portfolio or download Multi-Company Portfolios if you are associated to more than one company.

If you are associated to multiple STS accounts or a TPA, you can narrow your search by populating the filter with the Account Code or Account Name.
Next, select the Year to view your portfolio.

Additional information related to your portfolio is available on these tabs.

You can upload a TXT file to Add or Remove securities to your portfolio in a batch file or Export your Portfolio to a csv file.

On the Portfolio Summary tab you can see the total number of securities in your portfolio by Type (RMBS or CMBS), Status, total number of securities in your portfolio and applicable invoice(s).

**SECURITY STATUS** - for a given year, a security always has a status of one of the following:
- *N/A* - The security was not modeled or submitted for consideration for that particular year
- *Requested for Consideration* - The security is under review and whether or not it will be modeled has yet to be determined.
- *To Be Modeled* - That the security has undergone an initial review and will be modeled.
- *Modeled* - The security has been modeled.
- *Not Modeled* - The security will not be modeled. When a security is identified as 'Not Modeled', it is always accompanied by an explanation of why it was not modeled. The following are reasons a security will not be modeled
  - Asset Class
  - Obligation Type
  - Invalid
  - Insufficient Information Model
  - Insufficient Information Data
  - Under NAIC Threshold
  - Other

Add/Remove Securities in Bulk File Format
Add/Remove codes: Delete = 1 Add = 2
File format: "Company Code" "Add/Remove Code" "Cusip"
Example: 12345 2 0011AKC0

*NOTE: There is a 100 Cusip limit per file.*
Purchase Securities

The Purchase tab shows the securities that have been added to your portfolio that will be modeled and are available to purchase.

Securities that you no longer wish to purchase can be removed by selecting the Remove link prior to purchasing.

Export the security details that are available for purchase in your portfolio in a csv file.

Select Purchase to complete the process to purchase the security for your portfolio.

Download Modeled Data

Once you have purchased the securities and the Modeled Data is available, you can download the data on this tab, or Export the details to a csv file.
**History of Actions in your Portfolio**

View and download the actions that have occurred in your portfolio, the date it occurred and the individual who made the change.

**Download Multiple Portfolios**

Navigate to Portfolios > Multi-Company Portfolio Download

Select the file format for the download, and the portfolios to be included.

Select Submit to start the process to create the single Zip file with the portfolios.

The process to create the Zip file may take up to 15 minutes to complete. You may need to refresh your browser to see the link to the Zip file containing all portfolio files requested.
View Invoice Detail

View the details related to all of your invoices by navigating to My Account > View My STS Invoices

Select the year for the period to view all invoices, or Export the details in a csv file.

Select the invoice link to download the detailed list of securities on that invoice.
**Bulletin Board Notices**

The four most recent Bulletin Board notices display on the dash board. To see the details for any notice, simply move your cursor over the subject and a box will display with the message.

You can also select View All Posts to see other messages posted to the Bulletin Board.

**Cusip Credit**

If you have received a credit for a paid off security, you will now have an ‘Available Empty Slot’ in your portfolio to compensate you for that security. You can now use this empty slot to add the same type of security to your portfolio without being invoiced.

Once you have purchased the replacement security, it will show in your portfolio with the same invoice number as the replacement security. Also, the Portfolio Status for the ‘Available Empty Slot’ will change to ‘Used Empty Slot replaced by: Cusip #’.

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**Note:** If there are unused empty slots in your portfolio by the end of the first quarter 2014, the NAIC will issue you a refund.