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Presale:

# NRZ Advance Receivables Trust 2015-ON1 Series 2019-T1

July 12, 2019

## Preliminary Ratings

Class	Preliminary ratings	Type	Interest rate	Amount (mil. \$)
<b>Series 2019-T1</b>				
A-T1	AAA (sf)	Term note	Fixed	328.841
B-T1	AA (sf)	Term note	Fixed	12.223
C-T1	A (sf)	Term note	Fixed	14.286
D-T1	BBB (sf)	Term note	Fixed	40.182
E-T1	BB (sf)	Term note	Fixed	4.468

Note: This presale report is based on information as of July 12, 2019. The ratings shown are preliminary. Subsequent information may result in the assignment of final ratings that differ from the preliminary ratings. Accordingly, the preliminary ratings should not be construed as evidence of final ratings. This report does not constitute a recommendation to buy, hold, or sell securities.

## Transaction Summary

Closing date	July 25, 2019.
Distribution date	The 15th of each month, or the next business day, beginning Aug. 15, 2019.
Expected repayment date	July 15, 2022.
Legal final maturity date	July 15, 2052.
Total security amount (\$)	400 million.
Rated security amount (\$)	400 million.
Collateral type	Servicer advance receivables and accrued and unpaid servicing fees.
Collateral	Servicer advance reimbursements and accrued and unpaid servicing fees.
Credit enhancement	Overcollateralization (through the advance rates used to determine the price paid for the receivables), a reserve fund, and subordination.

### PRIMARY CREDIT ANALYST

**Sergey Voznyuk, CFA**  
New York  
+ 1 (212) 438 3010  
sergey.voznyuk  
@spglobal.com

### SECONDARY CONTACT

**Zhan Zhai**  
Toronto  
zhan.zhai  
@spglobal.com

### SURVEILLANCE CREDIT ANALYST

**Sujoy Saha**  
New York  
(1) 212-438-3902  
sujoy.saha  
@spglobal.com

## Participants

Receivables seller, servicer (before the MSR transfer dates), and subservicer (after the MSR transfer dates)	PHH Mortgage Corp. (successor by merger to Ocwen Loan Servicing LLC).
Servicers and receivables sellers (after the MSR transfer dates)	New Residential Mortgage LLC and NewRez LLC (d/b/a Shellpoint Mortgage Servicing).
Receivables seller and administrator	HLSS Holdings LLC.
Owner trustee	Wilmington Trust N.A.
Indenture trustee, calculation agent, paying agent, and securities intermediary	Deutsche Bank National Trust Co.
Administrative agent	Credit Suisse AG, New York Branch.
Depositor	NRZ Advance Facility Transferor 2015-ON1 LLC.
Issuer	NRZ Advance Receivables Trust 2015-ON1.

MSR--Mortgage servicing rights.

## Rationale

The preliminary ratings assigned to NRZ Advance Receivables Trust 2015-ON1's (NRART 2015-ON1's) \$400 million advance receivables-backed notes series 2019-T1 reflect:

- The strong likelihood of reimbursement of servicer advance receivables given the priority of such reimbursement payments;
- The transaction's revolving period, during which collections or draws on the outstanding variable-funding note (VFN) may be used to fund additional advance receivables, and the specified eligibility requirements, collateral value exclusions, credit enhancement test (the collateral test), and amortization triggers intended to maintain pool quality and credit enhancement during this period;
- The transaction's use of predetermined, rating category-specific advance rates for each receivable type in the pool that discount the receivables, which are non-interest bearing, to satisfy the interest obligations on the notes, as well as provide for dynamic overcollateralization;
- The projected timing of reimbursements of the servicer advance receivables, which, in the 'AAA', 'AA', and 'A' scenarios, reflects our assumption that the servicer would be replaced, while in the 'BBB' and 'BB' scenarios, reflects the servicer's historical reimbursement experience;
- The credit enhancement in the form of overcollateralization, subordination, and the series reserve accounts;
- The timely interest and full principal payments made under our stressed cash flow modeling scenarios consistent with the assigned preliminary ratings; and
- The transaction's sequential turbo payment structure that applies during any full amortization period.

The preliminary ratings assigned to the series 2019-T1 notes do not address whether the cash flows generated by the receivables pool will be sufficient to pay certain supplemental fees, such as default supplemental fees and expected repayment date (ERD) supplemental fees, which may become payable to noteholders if certain events occur (see the Transaction Overview section

below for a description of these fees).

## **S&P Global Ratings' Rankings On PHH Mortgage Corp. Are AVERAGE**

On Sept. 24, 2018, S&P Global Ratings assigned an AVERAGE ranking to PHH Mortgage Corp. (PMC) as a residential prime, subprime, and special servicer (see "Servicer Evaluation: PHH Mortgage Corp.," published Oct. 8, 2018). We highlight in the report that on Feb. 27, 2018, PMC announced a plan to merge with Ocwen Loan Servicing LLC (Ocwen). While the merger of both parent companies closed on Oct. 4, 2018, the merger of the servicing entities occurred on June 1, 2019. Following the merger, Ocwen plans to transition its loan portfolio from its proprietary servicing system to PMC's system (i.e., Black Knight's LoansSphere MSP®). PMC plans to leverage the workforce from the combined company to manage its combined servicing portfolio following the loan transfer. For reference, S&P Global Ratings previously had AVERAGE rankings on Ocwen as a residential primary, subprime, special, and subordinate-lien servicer.

## **Transaction Overview**

### **Transaction strengths**

We believe the following recovery mechanisms are strengths:

- The strong likelihood of the reimbursement of the servicer advance receivables because they are generally reimbursed at the top of the underlying transactions' waterfalls.
- For most of the receivables, the servicer may reimburse the advances from the related underlying transactions' general cash flows if liquidation proceeds from the related loans are insufficient to reimburse the advances (a general collections backstop).
- The transaction documents require the servicer to apply the recoveries to the advances outstanding on a first-in/first-out (FIFO) basis for a majority of the eligible receivables that may exist at any given time.

We believe the following structural mechanisms are strengths:

- The collateral test, which is required during the revolving period, measures whether there is sufficient overcollateralization for all series based on the predetermined advance rates and the amount of existing receivables. To prevent this test from failing, collections must be used to pay down the VFN's balance. If the collateral test fails, then full turbo repayment of principal to all series (a full amortization period) begins, after the applicable grace period's expiration.
- Target amortization triggers, which, upon certain events, require principal to be repaid on predetermined series-level schedules.
- Full amortization triggers, which commence a full amortization period. A full amortization period is caused by an event of default, such as the collateral test's failure.
- A series-specific reserve account intended to mitigate interest shortfalls on the notes.
- The advance rates are subject to automatic reductions through a trigger advance rate mechanism; if the collateral's monthly reimbursement rate declines below certain established levels, the advance rates for the related rating category could decrease by a specified percentage, increasing overcollateralization.

## Transaction weaknesses

We believe the following features are weaknesses (though these weaknesses are offset by mitigating factors where noted):

- The notes accrue interest at their respective coupon rates, but the advance receivables do not accrue interest. To address this negative carry risk, the advance receivables' values are discounted using advance rates that reflect our projection of the transaction's costs (which include senior fees and interest).
- As is the case in a typical servicer advance securitization, the servicer's or subservicer's practices and operational strengths can affect recovery speeds. Any disruptions or slowdowns of recovery speeds would worsen the transaction's negative carry. However, the transaction includes triggers that would cause a target amortization event or a reduction in advance rates if recovery speeds fall to certain levels.
- The foreclosure timeline in each state where the underlying loans were originated strongly influences the timeline for recoveries on advance receivables. To account for the longer foreclosure timelines in states with judicial foreclosure laws, advance rates for receivables in these states are generally lower than advance rates for receivables in states with non-judicial foreclosure laws.
- The transaction permits the issuer to purchase receivables that either do not benefit from a general collections backstop (non-backstopped) or may not be reimbursed on a FIFO basis (non-FIFO). However, the non-backstopped receivables are subject to a loan-level market value test that assigns a zero-collateral value to the portion of the advances that exceed a certain threshold. Furthermore, the advance rates for these receivables reflect haircuts that are consistent with our criteria (discussed below).

## Transaction collateral

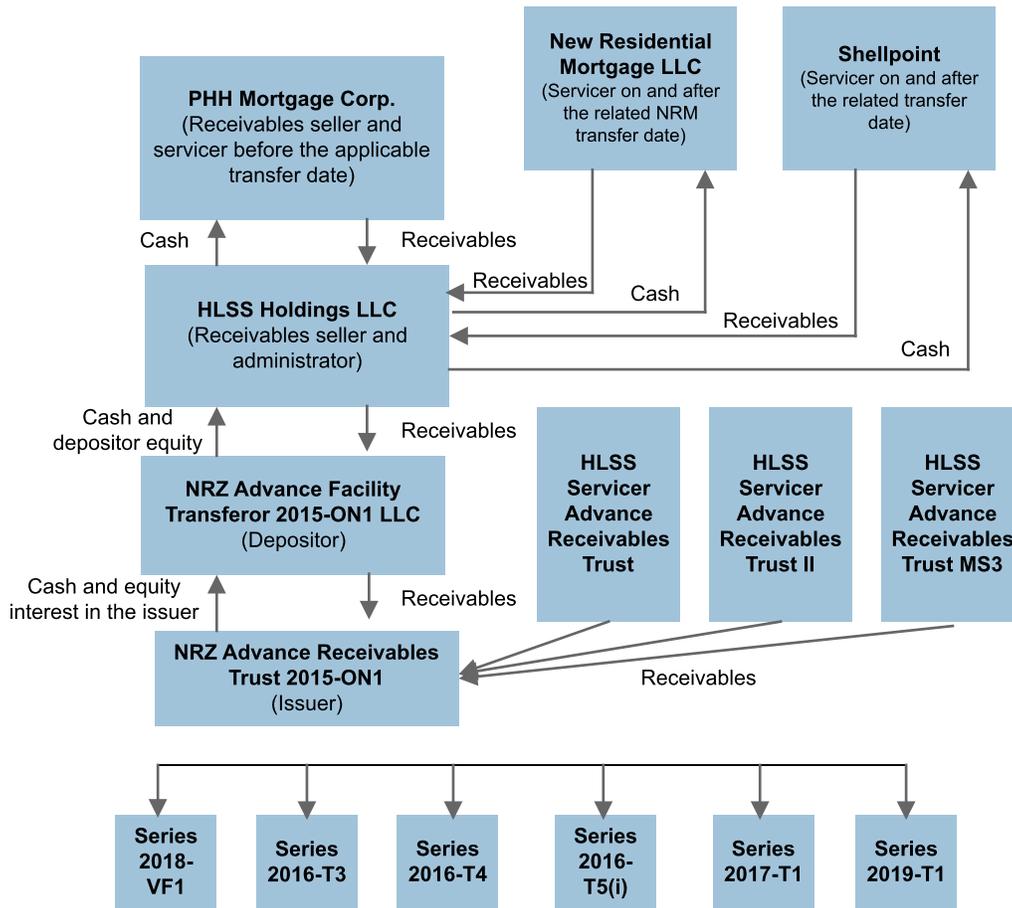
NRART 2015-ON1's principal assets are servicer advance receivables, both those purchased on or before the closing date and those purchased until the notes are paid in full. Servicer advance receivables represent the reimbursement rights for principal and interest (P&I), escrow, and corporate servicer advances, described below, made by PMC under designated servicing agreements (DSAs). NRART 2015-ON1's assets also include rights to payment for deferred servicing fees per these DSAs. The noteholders will be paid from the proceeds the servicer receives when these receivables are reimbursed. As specified in the DSAs, the servicer is required to make the following types of advances:

- The scheduled P&I payments that the mortgagors have not paid on time (P&I advances);
- The property taxes and insurance premiums that the mortgagors have not paid on time (escrow advances); and
- The costs and expenses incurred during the foreclosure, preservation, and sale of mortgaged properties, including the attorneys' fees and other professional fees and expenses incurred in connection with any foreclosure, liquidation, or other proceedings arising in the course of servicing the mortgage loans (corporate advances).

## Transaction structure

Series 2019-T1 will be issued by NRART 2015-ON1 on or about July 25, 2019. As a master issuer, NRART 2015-ON1 can issue multiple series (each of which may have distinct ERDs or other unique provisions), all of which are backed by a single collateral pool (see chart 1). As long as PMC is the servicer or subservicer (unless a servicer modification has occurred, as described below), the depositor is required to transfer new receivables from a DSA to the issuer until the notes are fully satisfied.

## Transaction Structure



(i) A portion of the proceeds of the Series 2019-T1 notes may be used to redeem the Series 2016-T5 notes.

MSR--Mortgage servicing rights. NRM--New Residential Mortgage.  
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The collateral pool may include certain outstanding receivables attributable to DSAs associated with HLSS Servicer Advance Receivables Trust, HLSS Servicer Advance Receivables Trust II, and HLSS Servicer Advance Receivables Trust MS3 that were transferred to, and included in, NRART 2015-ON1. Subsequent receivables attributable to these DSAs continue to be transferred to NRART 2015-ON1. The sponsor, New Residential Investment Corp. (NRZ), may transfer certain

servicing rights to NewRez LLC (Shellpoint) and New Residential Mortgage LLC, both subsidiaries of NRZ, and together the "NRZ Servicers" as described in the offering documents, it being understood that PMC will be the subservicer on the mortgage loans. PMC is the successor by merger to Ocwen. We generally obtain comfort of collateral transfers through our legal analysis (refer to Legal Matters section).

The transaction documents allow for entities purportedly structured as special-purpose entities (SPEs) that have not issued notes rated by S&P Global Ratings to sell advance receivables to the issuer directly, though certain conditions must be met before the issuer may purchase these receivables.

The transaction documents include a provision for a "servicer modification", which permits any of the following companies to become a servicer of some or all of the assets within the facility (assuming the underlying residential mortgage-backed securities allow such transfer):

- Nationstar Mortgage LLC;
- Select Portfolio Servicing Inc. or an affiliate thereof;
- Specialized Loan Servicing LLC or an affiliate thereof; or
- New Residential Investment Corp. or any of its subsidiaries.

We note this servicer modification, in and of itself, would not directly cause an event of default or trigger a full amortization period. Should one of the above named replacement servicers have a servicer advance reimbursement profile that is different at the time of transfer from the current servicer (PMC), the servicer modification could have an effect on the 'BBB' and 'BB' rated notes.

However, per the transaction documents, no servicer modification as described above (i.e., one that does not directly result in an event of default or trigger a full amortization period) may be effectuated without notifying S&P Global Ratings and receiving confirmation that there would be no adverse ratings impact. To the extent we are no longer providing such confirmation, no servicer modification may be effectuated that would have an adverse ratings impact as determined by the administrator and indenture trustee.

## **Transaction mechanics**

During the revolving period, the issuer may use collections from the receivables or may draw on the outstanding VFN (i.e., the VFN holder contributes cash to the issuer, and the VFN balance increases proportionally) to purchase additional receivables. To maintain pool quality and credit enhancement while the pool revolves, the transaction documents specify eligibility requirements, collateral value exclusions, the collateral test, and early amortization triggers. While no principal payments are generally due on the notes during the revolving period (except in cases where the VFN may be paid principal to satisfy the collateral test), interest is due monthly.

The revolving period for series 2019-T1 is scheduled to last 36 months. It may end earlier upon the occurrence of a target amortization event or the start of a full amortization period due to an event of default (see the Target amortization events and Events of default sections below). If a target amortization event occurs for a series, the issuer must pay interest and a targeted principal amount to all noteholders of that series each month until that series is paid in full. If a full amortization period is triggered, all series enter rapid amortization, and any funds remaining after paying interest and senior fees are distributed as principal payments each month until the notes are paid in full. Following the occurrence of an event of default and the commencement of a full amortization period, our analysis assumes the issuer will no longer acquire additional receivables

due to the transfer of servicing to a successor servicer from PMC.

The other amounts that may become payable on the notes include ERD supplemental fees and default supplemental fees. The ERD supplemental fee is payable to the noteholders if such notes have not been paid in full or refinanced by the expected repayment date. In addition, if an event of default occurs, and a full amortization period has commenced and is continuing, a default supplemental fee is payable to the noteholders. ERD and default supplemental fees are subordinate to interest and principal payments on the notes, and failure to pay such amounts is not an event of default under the transaction documents. S&P Global Ratings' analysis does not address the likelihood that either of these supplemental fees will be paid.

## **Eligibility requirements**

To maintain certain minimum pool characteristics, the transaction documents specify facility eligibility requirements, and any receivables that do not meet these requirements are assigned a collateral value of zero. We believe the transaction's facility eligibility requirements are similar to those we have observed in peer servicer advance transactions.

A facility eligible receivable, in general, is a receivable that, among other things, relates to a P&I, escrow, or corporate servicer advance that was made by the related servicer or subservicer on a mortgage loan or relates to a deferred servicing fee earned under an applicable DSA that:

- Arises in connection with either a first-lien mortgage loan (for the VFN and term series) or a second-lien mortgage loan (for the term series only); and
- Was included in an eligible DSA.

## **Collateral test**

The collateral test is designed to maintain credit enhancement during the revolving period and trigger rapid amortization upon deterioration in enhancement levels. In addition, required enhancement levels for this test will self-adjust with any change in pool composition because the transaction documents include advance rates for each advance type. As defined in the transaction documents, the collateral test requires the series' collateral value to be greater than or equal to the series' invested amount.

To prevent a failure of the collateral test:

- Available funds may be used to reduce the outstanding VFN class balances, per the payment priority, thus reducing a VFN series' invested amount; or
- HLSS Holdings LLC may contribute additional collateral to the transaction.

If the collateral test fails beyond the applicable grace period, the transaction would experience an event of default, after which draws may not be made on any VFN outstanding. Once the full amortization period starts following an event of default and the end of any associated grace period, the payment priority would also change so that principal on the notes would be repaid sequentially within each series, disregarding any target amortization amounts.

For purposes of the collateral test, all series specify collateral value exclusions, which means that the transaction assigns zero credit to certain receivables. These exclusions are in addition to the facility eligibility requirements discussed above. For example, receivables that cause a DSA's advance-to-property value to exceed a certain threshold would be excluded. DSAs with low

underlying loan balances or counts would also be excluded beyond a certain threshold. Furthermore, although the transaction allows the issuer to acquire non-backstopped and non-FIFO receivables, concentrations of these advance types beyond 25% and 17.5% (in certain circumstances 49%), respectively, are excluded for purposes of calculating the collateral test. Although non-FIFO and non-backstopped receivables above these thresholds are omitted for the collateral test, any applicable cash flows from these receivables are included in the transaction. We believe the specified collateral value exclusions, on an overall basis, are similar to those we have observed in peer servicer advance transactions.

## **Target amortization events**

Events that would trigger a target amortization period include the following:

- The series reaches the ERD and is not refinanced;
- The three-month rolling average of total advance receivables collected each month is less than 5x the aggregate interest due for each class of notes in the current month;
- One or more servicer termination events occur under the DSAs that represent more than 15% of the underlying collateral by mortgage balance in the facility, with certain exceptions;
- The monthly reimbursement rate is less than 3.00%;
- A breach of certain covenants, representations, or warranties are made by the transaction participants that are not cured within any applicable cure period and for which written notice has been delivered to the indenture trustee by either the administrative agent or the required noteholders of the applicable series of notes; or
- The administrator fails to deliver a determination date report, and this continues to be unremedied for 30 days.

Certain other events, including those generally related to PMC's, HLSS Holdings LLC's, Shellpoint's, and New Residential Investment Corp.'s performance and the performance of the VFN series, constitute a target amortization event for the VFN. These may potentially cause an event of default and start the full amortization period for all series if a target amortization payment is not made when due, whereby each series would be paid according to the full amortization waterfall and the issuer would not acquire any additional receivables. The likelihood of target amortization events for the VFN occurring was not integral to our cash flow analysis because, per our criteria, we assumed that a full amortization period would commence following an event of default.

For each month during a target amortization period, principal must be paid to the noteholders according to a schedule. If any series does not receive the amount due, an event of default would occur and the full amortization period would commence. Whether a target amortization amount is paid when due is not integral to our cash flow analysis because, per our criteria and as explained above, our analysis assumes that an event of default has occurred.

## **Events of default**

Events of default include:

- A failure to pay interest or principal (including target amortization amounts) to the notes on any payment date, excluding the failure to pay ERD or default supplemental fees or any subordinated interest amounts;

## Presale: NRZ Advance Receivables Trust 2015-ON1 Series 2019-T1

- A failure of the servicer or subservicer to comply with the deposit and remittance requirements in any DSA;
- A failure of the receivables seller to tender required indemnity payments following a breach of representations or warranties in the receivables sale agreement;
- The occurrence of an insolvency event relating to the administrator, the receivables seller, the servicer, a subservicer, or the depositor;
- The issuer or the trust estate is subject to registration as an "investment company" within the meaning of the Investment Company Act of 1940;
- The depositor sells, transfers, pledges, or otherwise disposes of the owner trust certificate (except to a wholly owned subsidiary of HLSS Holdings LLC), representing its ownership interest in the issuer;
- Any material provision of any transaction document ceases to be valid and binding on, or enforceable against, the transaction parties;
- The administrator or its affiliate takes an action (or fails to take an action) that impairs the issuer's interests in the receivables;
- The series reserve account is not replenished on the payment date following a draw;
- U.S. federal income tax is imposed on the issuer;
- The collateral test's failure after the remedy period; or
- A failure of the applicable receivables seller to sell or contribute additional receivables as required under the transaction documents, or the servicer sells or contributes receivables related to an underlying transaction to anyone other than the issuer.

Following the commencement of a full amortization period, the payment priority allocates available funds to each series based on its series invested amounts as of the end of the revolving period. After being used to pay each series' share of senior trust-level fees, series-level fees, and interest, remaining series available funds are paid as principal to the classes in sequential order.

## Advance Rates

Each receivable purchased by the issuer will be discounted according to the advance rates specified in the transaction documents (see tables 1-4 below). According to our criteria, we considered the following when assessing whether the advance rates, which determine credit enhancement, are consistent with our assigned preliminary ratings:

- Our projected timing of reimbursements, which is dependent on our servicer advance sector outlook, the advance type mix, and, for 'BBB' ratings and below, the servicer classification (further described below);
- The transaction's fees and note interest liabilities;
- Our cash flow analysis, which assesses whether the advance rates are sufficient for noteholders to receive timely interest and ultimate principal based on the capital structure (further described below);
- The presence of any non-FIFO or non-backstopped receivables;
- The tenor of the revolving period; and

**Presale: NRZ Advance Receivables Trust 2015-ON1 Series 2019-T1**

- Whether the weighted average advance rates exceeded the rating-category maximums described in our criteria.

After considering these factors, as further described below, we determined that the advance rate matrices in the transaction are consistent with our assigned preliminary ratings.

Table 1

**Series 2019-T1 FIFO/Backstopped Advance Rates**

Advance type	Advance rate (%)				
	Class A	Class B	Class C	Class D	Class E
Rating scenario	AAA	AA	A	BBB	BB
Non-judicial P&I	82.75	86.00	89.00	94.50	95.50
Judicial P&I	73.50	77.00	81.25	92.00	93.25
Non-judicial DSF	83.25	85.75	88.00	94.00	94.75
Judicial DSF	73.75	76.50	80.00	91.25	92.50
Non-judicial escrow	83.25	85.75	88.00	94.00	94.75
Judicial escrow	73.75	76.50	80.00	91.25	92.50
Non-judicial corporate	83.25	85.75	88.00	94.00	94.75
Judicial corporate	73.75	76.50	80.00	91.25	92.50

FIFO--First in, first out. P&I--Principal and interest. DSF--Deferred servicing fee.

Table 2

**Series 2019-T1 FIFO/Non-Backstopped Advance Rates**

Advance type	Advance rate (%)				
	Class A	Class B	Class C	Class D	Class E
Rating scenario	AAA	AA	A	BBB	BB
Non-judicial P&I	72.75	78.00	83.00	90.50	93.50
Judicial P&I	63.50	69.00	75.25	88.00	91.25
Non-judicial DSF	73.25	77.75	82.00	90.00	92.75
Judicial DSF	63.75	68.50	74.00	87.25	90.50
Non-judicial escrow	73.25	77.75	82.00	90.00	92.75
Judicial escrow	63.75	68.50	74.00	87.25	90.50
Non-judicial corporate	73.25	77.75	82.00	90.00	92.75
Judicial corporate	63.75	68.50	74.00	87.25	90.50

FIFO--First in, first out. P&I--Principal and interest. DSF--Deferred servicing fee.

Table 3

**Series 2019-T1 Non-FIFO/Backstopped Advance Rates**

Advance type	Advance rate (%)				
	Class A	Class B	Class C	Class D	Class E
Rating scenario	AAA	AA	A	BBB	BB

Table 3

**Series 2019-T1 Non-FIFO/Backstopped Advance Rates (cont.)**

Advance type	Advance rate (%)				
	Class A	Class B	Class C	Class D	Class E
Non-judicial P&I	77.75	82.00	86.00	92.50	94.50
Judicial P&I	68.50	73.00	78.25	90.00	92.25
Non-judicial DSF	78.25	81.75	85.00	92.00	93.75
Judicial DSF	68.75	72.50	77.00	89.25	91.50
Non-judicial Escrow	78.25	81.75	85.00	92.00	93.75
Judicial Escrow	68.75	72.50	77.00	89.25	91.50
Non-judicial corporate	78.25	81.75	85.00	92.00	93.75
Judicial corporate	68.75	72.50	77.00	89.25	91.50

FIFO--First in, first out. P&I--Principal and interest. DSF--Deferred servicing fee.

Table 4

**Series 2019-T1 Non-FIFO/Non-Backstopped Advance Rates**

Advance type	Advance rate (%)				
	Class A	Class B	Class C	Class D	Class E
Rating scenario	AAA	AA	A	BBB	BB
Non-judicial P&I	67.75	74.00	80.00	88.50	92.50
Judicial P&I	58.50	65.00	72.25	86.00	90.25
Non-judicial DSF	68.25	73.75	79.00	88.00	91.75
Judicial DSF	58.75	64.50	71.00	85.25	89.50
Non-judicial escrow	68.25	73.75	79.00	88.00	91.75
Judicial escrow	58.75	64.50	71.00	85.25	89.50
Non-judicial corporate	68.25	73.75	79.00	88.00	91.75
Judicial corporate	58.75	64.50	71.00	85.25	89.50

FIFO--First in, first out. P&I--Principal and interest. DSF--Deferred servicing fee.

**Projected timing of reimbursements and assumed advance type mix**

Our criteria specify reimbursement curves for each advance receivable type and rating category. For relatively slower projected reimbursement curves, we generally expect higher credit enhancement levels (i.e., lower advance rates) to address the relatively greater negative carry and vice versa. Accordingly, the pool composition will drive our overall weighted average projected reimbursement curve (and the advance rates) for each rating category. Table 5 shows the pool mix used in our analysis.

Table 5

**NRART 2015-ON1 Pool Mix**

<b>Advance type</b>	<b>Proportion of total (%)</b>
Non-judicial DSF	2.6
Judicial DSF	4.4
Non-judicial P&I	11.6
Judicial P&I	19.0
Non-judicial escrow	10.2
Judicial escrow	31.5
Non-judicial corporate	7.4
Judicial corporate	13.3

DSF--Deferred servicing fees. P&I---Principal and interest.

**Servicer Advance Sector Outlook**

In our view, the servicer advance sector is currently under a moderate ('BBB') level of stress (see "Reimbursement Curves For Servicer Advance Securitizations Backed By U.S. Residential Mortgage Loan Advance Receivables," published Dec. 14, 2018). As described in our criteria, the reimbursement curves that we applied in our analysis reflect this view.

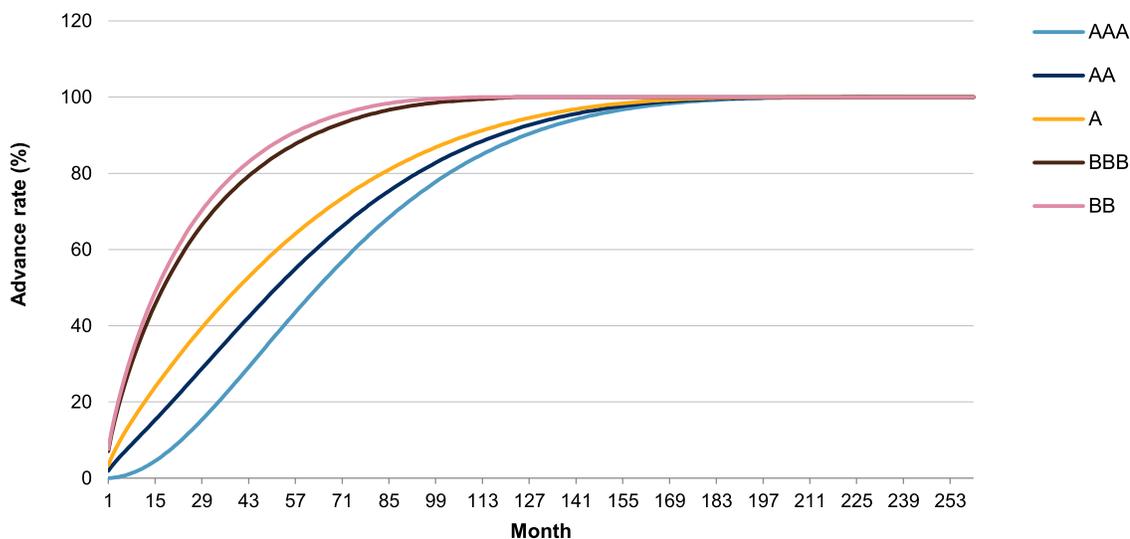
**Servicer classification for reimbursement curves at 'BBB' and lower**

We received historical advance reimbursement data from PMC in recently rated transactions. We also analyzed PMC-specific historical loan transition data from LoanPerformance (a third-party data provider). We used both sets of data to derive PMC-specific reimbursement curves and compared the PMC-specific reimbursement curves with our three 'B' reimbursement curves ("above standard," "standard," and "below standard"), which represent our expected case as described in our criteria. The PMC-specific reimbursement curves were most consistent with our 'B' "above standard" curve.

Therefore, when analyzing the 'BBB' rated class D notes and the 'BB' rated class E notes, we used, respectively, the 'BBB' "above standard" and 'BB' "above standard" curves set forth in our criteria. At the 'A' rating level and higher, our reimbursement curves are indifferent to the servicer's historical reimbursement rates; thus, the "above standard," "standard," and "below standard" categories are not applicable. We assume the existing servicer will not be operating as the servicer in these high-stress scenarios (see chart 2).

Chart 2

### Weighted Average Recovery Curves



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### Cash flow analysis

We performed a cash flow analysis (see the Cash Flow Modeling Assumptions And Scenario Analysis section below) to determine whether the transaction's advance rates were sufficient to pay timely interest and ultimate principal to the rated classes. In our cash flow analysis, we evaluated the advance rates, note coupons, and reserve requirements under the reimbursement curves described above. The advance rates used in our cash flow analysis did not reflect any non-FIFO, non-backstopped, or revolving period tenor (for series 2019-T1, see the Revolving period section below) haircuts because we generally evaluate haircuts on a post-cash flow basis.

Per our criteria, all of the cash flow scenarios that we analyzed simulated a full amortization period following an event of default. In these circumstances, we assume additional receivables would not be acquired by the issuer and the only source to repay the notes is cash flow from the outstanding receivables. The change in payment priority associated with an event of default, whereby low-coupon bonds pay off faster than the higher-coupon subordinate bonds, further stresses cash flows.

### Advance rate haircuts

Consistent with our criteria, some of the issuer's advance rates reflect certain haircuts (reductions) to the advance rates that would otherwise apply to the advance receivable type. These haircuts are applicable when recovery mechanics either do not provide for a general collections backstop or potentially operate on a non-FIFO basis.

In circumstances where a receivable does not benefit from a general collections backstop, the advance rates provided by the issuer reflected a reduction of 2% for a 'BB' scenario to 10% for

'AAA', consistent with our criteria. In circumstances where a receivable may be reimbursed on a non-FIFO basis, the advance rates provided by the issuer reflected a reduction of 1% for a 'BB' scenario to 5% for 'AAA', which is also consistent with our criteria.

## **Revolving period**

When evaluating the transaction's advance rates, we also considered the tenor of the revolving period. As described in our criteria, longer revolving terms may introduce additional risks due to the increased uncertainty related to potential legal and regulatory concerns facing servicers in the residential mortgage-backed securities market that could delay advance reimbursements. Because the revolving period for series 2019-T1 is 36 months, no additional advance rate reductions were applied.

## **Trigger advance rate**

According to the transaction documents, the advance rates are subject to a floor called "the trigger advance rate." The advance rates for a series will be the lesser of the applicable advance rate related to each advance type and the trigger advance rate. The trigger advance rate is a function of the series' interest rate, the rate at which advances are reimbursed in a given month, and the class-specific stress multiple set forth in the transaction documents. If the trigger advance rate drops below the weighted average advance rate, the trigger advance rate will instead be used to calculate the collateral value, resulting in increased credit enhancement.

## **Reserve accounts**

Each series benefits from a reserve account. The funds on deposit in a reserve account may be used to pay fees and interest that otherwise have not been paid using available funds. If an event of default has not occurred or been waived, the series' reserve account will be replenished each month to the amount required by the transaction documents. After an early amortization event has occurred and has not been waived, the reserve fund will no longer be replenished.

The required reserve for the series is four months' note interest for each class unless non-FIFO receivables are in the trust estate, in which case it is five months' note interest if the non-FIFO receivables constitute up to 25% of the trust estate and six months' note interest if the non-FIFO receivables constitute more than 25% of the estate. Per our criteria, NRART 2015-ON1's required reserve account for the series is sufficient for a maximum transaction rating of 'AAA' given that:

- The underlying pools' normalized Herfindahl-Hirschman Index is about 7.0%;
- The state/territory count is 53; and
- The collateral value exclusion provisions in the transaction documents limit non-FIFO receivables to 49%.

Our criteria include different interest reserve amounts for non-FIFO receivables, and we accounted for this when analyzing the reserve accounts.

## **Payment Priority**

On each distribution date, the available funds or the series' available funds, as applicable, will be paid to the noteholders according to the payment priority in the transaction documents (see table

6).

Table 6

## Payment Waterfall

Priority	Payment
<b>If a full amortization period is not in effect:</b>	
1	The indenture trustee fee, owner trustee fee, and the indemnification amounts owed to the indenture trustee and owner trustee, with the expenses and indemnification amounts subject to certain expense limits(i).
2	Fees, series fees, undrawn fees, facility fees, increased costs, and expenses and indemnification amounts, subject to the applicable expense limit, increased costs limit, and series fee limit.
3	The interest amount (for the VFN series, this includes the senior and subordinate margin) due to each series of notes, pro rata, according to the interest entitlement. Any deficiencies will be covered by funds in the related series' reserve account, to the extent possible.
4	An amount to the series' reserve account, up to the required amount.
5	To those series that have begun their target amortization period, the respective series' pro rata share of remaining available funds based on the series' target amortization amounts.
6	To pay down the VFN or reserve cash to satisfy the collateral test.
7	Any new receivables funding amount.
8	Any due and unpaid ERD supplemental fees, default supplemental fees, and subordinated interest amounts to each series of notes, pro rata.
9	Any unpaid fees and expenses.
10	Principal payments to the VFN, at the administrator's direction.
11	Principal payments to any sinking fund accounts, at the administrator's direction.
12	Any excess cash amount to the depositor, to the extent that such payment would not cause a collateral test failure.
<b>If a full amortization period is in effect:</b>	
1	The indenture trustee fee, owner trustee fee, and the indemnification amounts owed to the indenture trustee and owner trustee, with the expenses and indemnification amounts subject to certain expense limits(i).
2	Verification agent fees, calculation agent fees, and expenses and indemnification amounts owed for administrative expenses of the issuer, with the expenses and indemnification amounts subject to certain expense limits(i).
3	All remaining funds allocated to each series, pro rata, based on their series invested amounts as of the date the full amortization period began.
3(a)	Series fees, subject to the series fee limit.
3(b)	Undrawn fees related to any VFN.
3(c)	Interest amount (for the VFN series, this includes only the senior margin) due to each series of notes.
3(d)	All remaining series available funds as principal payments to each series in sequential order until each series' note balances have been reduced to zero.
3(e)	Any due and unpaid ERD and default supplemental fees and subordinated interest amounts to each note.

Table 6

**Payment Waterfall (cont.)**

3(f)	To other series to the extent that they may have had unpaid amounts after allocating their series available funds for items 3(a) through 3(e), pro rata, based on the amount of such unpaid amounts for each series.
4	Unpaid fees and expenses.
5	Any other amounts required to be paid according to the indenture supplements.
6	Any excess cash amount to the depositor.

(i) For the indenture trustee, \$200,000 in any calendar year; for the owner trustee, \$5,000 in any calendar year; for other administrative expenses, \$50,000 in any calendar year. ERD--Expected repayment date. VFN--Variable funding notes.

The paying agent will make payments allocated to the notes according to the above payment priority from the base indenture, as well as the series-specific priority contained within the supplemental indentures (see table 7).

Table 7

**Series Payment Waterfall**

Item	Payment
Interest payment amounts	First, to class A; then to class B; then to class C; then to class D; and then to class E.
Target amortization principal	Pro rata, among the classes of the series based on their respective target amortization amounts(i).
Full amortization principal	First, to class A until its balance has been reduced to zero; then to class B until its balance has been reduced to zero; then to class C until its balance has been reduced to zero; then to class D; and then to class E until its balance has been reduced to zero.

(i) For both series, 1/12 of the class' note balance as of the last day of its revolving period.

**Cash Flow Modeling Assumptions And Scenario Analysis**

As noted in the Advance Rates section, we modeled each series to simulate 'AAA', 'AA', 'A', 'BBB', and 'BB' rating stress scenarios. In our cash flow modeling, we assumed that an event of default occurred and a full amortization period commenced, that no additional advances are purchased by the issuer, and that the series allocation percentages are based on the series invested amounts at the end of the revolving period. In each scenario, we modeled the rating-specific reimbursement curve (see chart 2) and allocated the cash flows received each month to pay senior fees, note interest, and turbo principal per the full amortization payment priority (see tables 6 and 7). We applied to the series the full amount of issuer-level fees, including expenses/indemnifications at their fully capped amount (\$295,000 per year), given that, if a single series remains outstanding, it would have to bear these expenses as opposed to the expenses/indemnifications being shared across all outstanding series. We did not model ERD or default supplemental fees because these are subordinate in the waterfall and not addressed by our ratings, as discussed in our imputed promises criteria (see "Principles For Rating Debt Issues Based On Imputed Promises," published Dec. 19, 2014).

The cash flow results showed that each class of notes received timely interest and full principal when subjected to the timing stresses that are consistent with the assigned ratings.

## Legal Matters

In rating this transaction, S&P Global Ratings will review the legal matters that it believes are relevant to its analysis, as outlined in its criteria.

## Related Criteria

- Criteria | Structured Finance | Legal: U.S. Structured Finance Asset Isolation And Special-Purpose Entity Criteria, May 15, 2019
- Criteria | Structured Finance | General: Incorporating Sovereign Risk In Rating Structured Finance Securities: Methodology And Assumptions, Jan. 30, 2019
- Criteria | Structured Finance | General: Methodology: Criteria For Global Structured Finance Transactions Subject To A Change In Payment Priorities Or Sale Of Collateral Upon A Nonmonetary EOD, March 2, 2015
- General Criteria: Principles For Rating Debt Issues Based On Imputed Promises, Dec. 19, 2014
- Criteria | Structured Finance | RMBS: Methodology For Rating Servicer Advance Securitizations Backed By U.S. Residential Mortgage Loan Advance Receivables, Oct. 30, 2014
- Criteria - Structured Finance - General: Criteria Methodology Applied To Fees, Expenses, And Indemnifications, July 12, 2012
- General Criteria: Global Investment Criteria For Temporary Investments In Transaction Accounts, May 31, 2012
- General Criteria: Understanding S&P Global Ratings' Rating Definitions, June 3, 2009
- Criteria - Structured Finance - General: Standard & Poor's Revises Criteria Methodology For Servicer Risk Assessment, May 28, 2009

## Related Research

- Ocwen Loan Servicing LLC Residential Mortgage Servicer Rankings Withdrawn Following Its Merger With PHH Mortgage Corp., July 3, 2019
- Credit Rating Model: U.S. RMBS Servicer Advance AR Model, April 11, 2019
- Reimbursement Curves For Servicer Advance Securitizations Backed By U.S. Residential Mortgage Loan Advance Receivables, Dec. 14, 2018
- Servicer Evaluation: PHH Mortgage Corp., Oct. 8, 2018
- Two Rankings Assigned, Two Affirmed On PHH Mortgage Corp. As A Residential Servicer; Outlooks Stable, Sept. 24, 2018
- Deal Analyzer Cash Flow - U.S. RMBS Servicer Advance Model General, Dec. 21, 2015
- Credit FAQ Takes a Closer Look at Standard & Poor's Criteria for Rating Servicer Advance Transactions, Aug. 11, 2015
- Global Structured Finance Scenario And Sensitivity Analysis: Understanding The Effects Of Macroeconomic Factors On Credit Quality, July 2, 2014

In addition to the criteria specific to this type of security (listed above), the following criteria articles, which are generally applicable to all ratings, may have affected this rating action:

"Counterparty Risk Framework: Methodology And Assumptions," March 8, 2019; "Post-Default Ratings Methodology: When Does Standard & Poor's Raise A Rating From 'D' Or 'SD'?", March 23, 2015; "Global Framework For Assessing Operational Risk In Structured Finance Transactions," Oct. 9, 2014; "Methodology: Timeliness of Payments: Grace Periods, Guarantees, And Use of 'D' And 'SD' Ratings," Oct. 24, 2013; "Criteria For Assigning 'CCC+', 'CCC', 'CCC-', And 'CC' Ratings," Oct. 1, 2012; "Methodology: Credit Stability Criteria," May 3, 2010; and "Use of CreditWatch And Outlooks," Sept. 14, 2009.

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