method for investors to communicate. In order to retain the flexibility to develop the best methods of communication, however, we do not believe that the method of communication should be specified in the rules.

Our investor members have indicated that they would prefer to use existing communication channels developed by the industry to communicate with each other instead of communicating through the Form 10-D filings for several reasons. The requirement that communications be made through the Form 10-D filing would delay communications between investors. Because the Form 10-D is filed with the Commission within 15 days of the distribution date, the filing would be made 16 to 60 days after the request was made. In addition, because the From 10-D filing is available to the public, a number of our investor members have voiced privacy concerns and stated that in certain situations they may want to contact other investors without doing so publicly. Finally, our investor members would prefer to receive information and communications through existing channels they already regularly monitor instead of incurring the additional monitoring costs and inconvenience of regularly reviewing the Form 10-D filings.

The CMBS market regularly responds to changing investor concerns with respect to the provision of information to investors and communications among investors and transaction parties. The industry currently provides a number of methods of communication with investors including distribution date statements, the comprehensive IRP developed by the CRE Finance Council and transaction level websites, which provide investors with real time forums to communicate and receive information. We believe that allowing transaction parties and investors to use one of these existing methods of communication or to craft a new method of communication meeting their unique requirements would better facilitate meaningful communication.

Likewise, the CMBS industry already has proven requirements and processes in place for investors to gain access to certain reports and transaction websites. Our members believe that the rules should not specify any maximum, minimum or specific requirements for verifying if a party making a communication request is an investor, but should instead allow the transaction parties to determine the best method of verification. Should the Commission decide to include rules with respect to investor verification requirements, it should be noted that the record holder listed with respect to a majority of CMBS certificates is the Depository Trust Company and, in such instances, the communication request should be coming from the beneficial owner and not the record holder. Although the trustee can request a list of beneficial owners from the Depository Trust Company, the process is costly and can take days or weeks to complete. In addition, a custodian, and not the true beneficial owner is often the party named on the Depository Trust Company's holder report.

Recommendation: For the reasons mentioned above, the CRE Finance Council recommends that, with respect to CMBS transactions, the Commission require that the underlying transaction documents provide a reasonable method for investors to communicate, but not specify such method or specify the method by which the transaction parties may verify an investor's identity.

VII.   **Filing of Substantially Final Underlying Transaction Documents**

The Re-Proposed Rules would require issuers to file copies of the underlying transaction agreements, in substantially final form, at the time the preliminary prospectus under proposed Rule 424(h). The Release also included a question as to whether issuers should be required to file, as an exhibit to the prospectus supplement, a copy of the representations, warranties, remedies and exceptions with respect to the transaction assets, marked to show how they compare to industry developed model provisions.

Our members do not object to the requirement concerning the filing of substantially final forms of the underlying transaction documents at the time the preliminary prospectus is filed under proposed Rule 424(h). We ask, however, that the Commission specify in the final rule that the underlying transaction documents required to be so filed are limited to those currently required to be filed as exhibits to the registration statement. In addition, we ask that the Commission include a statement in the final rule indicating that any changes made to the underlying transaction documents after the initial Rule 424(h) filing would not require a subsequent Rule 424(h) filing. Any changes to the underlying transaction documents that would be material to investors would be reflected in the prospectus supplement and, therefore, the requirement for a new Rule 424(h) filing with respect to material changes in the prospectus supplement should be sufficient. The underlying transaction documents for CMBS transactions include numerous parties and are often revised up to the moment of the transaction closing. Requiring a new Rule 424(h) filing due to changes in the underlying transaction documents would be unduly burdensome and would unnecessarily delay the closing of CMBS transactions.

Although our members generally do not object to the proposed filing requirement with respect to the underlying transaction documents and understand the Commission's reasons for proposing the requirement, we do not believe that issuers should be required to similarly file, as an exhibit to the prospectus supplement, a copy of the representations, warranties, remedies and exceptions with respect to the transaction assets, marked to show how they compare to industry developed model provisions, as one commentator suggested. Rule 17g-7 of the Reform Act already requires rating agencies to provide this information in their pre-sale reports. In addition, the representations and warranties, remedies and exceptions will be set forth in the substantially final mortgage loan purchase agreement filed at the time of the Rule 424(h) filing. This will provide investors with sufficient time to compare the provisions to any standard or industry developed model they choose.

Recommendation: For the reasons mentioned above, the CRE Finance Council recommends that, with respect to CMBS transactions, (i) a clarifying statement be added to the rule specifying that the underlying transaction documents required to be filed are only those currently required to be filed as exhibits to the registration statement, (ii) a subsequent Rule 424(h) filing not be required due solely to changes to the underlying transaction documents previously filed and (iii) issuers not be required to file the representations, warranties, remedies and exceptions with respect to the transaction assets, marked to show how they compare to industry developed model provisions.

VIII. Additional Asset Level Data Disclosure Questions

Our members have reviewed the Commission's questions concerning additional asset level data disclosure set forth in the Release. Certain of the questions posed in the Release have little or no relevance to CMBS and are, therefore, not addressed in this letter. For instance, Questions 92 through 97 relate to reporting when assets are added to the pool after issuance and should, therefore, be inapplicable to CMBS transactions, which have static asset pools. Our thoughts with respect to those questions we believe are relevant to the CMBS market are set forth below.

Question 68: Question with respect to the implementation of Section 7(c) by the proposed rules:

As stated in our previous response letter, our members agree with the Commission that robust information is necessary to give investors the ability to make informed investment decisions, as evidenced by the CMBS industry's longstanding use of the IRP, which already includes the vast majority of the Commission's proposed general and CMBS-specific data items. The CRE Finance Council, including investor members, feels strongly that the addition of new fields that are not of significance to CMBS or the inclusion of fields that are not in exact alignment with how those fields may be reported in the current IRP would cause significant, costly and undue programming burdens without any material benefit to investors. To that end, the CRE Finance Council recommends that the SEC tailor Schedule L-D to take into consideration the data points as already presented in the IRP. We have re-attached, as Exhibit A, our suggested modifications to each proposed Item on Schedule L-D and, as Exhibit B, a sample of the form of Schedule L-D for CMBS that gives effect to such suggested modifications. We would like to work with the Commission to create a schedule that will meet the goals of providing robust data while allowing CMBS transaction participants and data users to provide a subset of data as it is presented in the current IRP.

In addition, the CRE Finance council believes that distribution of data through SEC filings does not add much value in the CMBS context but would add costs to the transactions. As set forth in our prior response letter, the CMBS market has been a leader in ongoing reporting as is evidenced by the IRP. The IRP is either distributed directly to investors or made easily accessible to investors electronically much sooner than proposed filings, thereby making such filings unnecessary and of little value to investors. Our investor members have indicated that they would prefer to be provided information pursuant to a distribution source they already rely on, rather than being required to consult yet another source. We therefore urge the Commission to consider allowing the CMBS market to distribute any required ongoing reporting through means already in place, such as the IRP.

Question 69: Question with respect to the proposed required XML format:

The CMBS industry has an existing mechanism for standardizing and comparing data across similar securities through the IRP. In addition, as set forth in our prior response letter, based on a survey of investor members, we are not aware of any investor who converts IRP data from Excel to XML. Therefore, we firmly believe that it would be a significant, costly burden to convert to a new technology and could potentially cause additional data quality risks as the

conversion is implemented. Our members believe that XML is an adequate standard for the format of data, and are in fact working to develop a roadmap for establishing a new IRP to accommodate XML delivery. However, we do not believe that requiring the CMBS industry to convert to an XML format is appropriate or worth the cost.

Questions 70-76: Questions relating to loan brokers and originators:

As opposed to certain other asset classes, loans originated for CMBS are originated in a competitive rate environment with multiple lenders competing for commercial borrowers' loans. The identity of the originator is already disclosed in the transactions documents and, therefore, numbers are not necessary. In addition, additional disclosure on tax identification numbers and other identifying information could potentially be used to facilitate financial fraud and create potential privacy and security issues. Our members do not see any benefit to providing such information in the context of CMBS and, therefore, do not believe it is worth the risks involved.

Questions 77-78: Questions regarding whether risk retention figures should be allocated and reported on a loan level basis:

Our members do not believe this would add any value in the CMBS industry and therefore do not support the addition of this disclosure.

Question 79: Question with respect to disclosing net present value on loss mitigation v. foreclosure:

It is our interpretation that this questions regarding disclosure of net present value analysis is relative to RMBS only. Such disclosure for CMBS, given the numerous alternatives, numerous variables associated with varying property types and income generating properties and numerous legal paths to asset recovery, would be inadvisable, unduly burdensome and would not provide a comprehensive picture to investors. With respect to CMBS, detailed standards are already in place within the transaction documents setting forth the manner in which a special servicer is to determine and execute the best recovery method for an asset. These existing standards set forth in the transaction documents should be sufficient for the CMBS market.

Question 80: Question with respect to fee disclosure:

We do not believe that any additional disclosure with respect to fees received by transaction parties is required in the CMBS market. Fees earned by servicers, trustees and other parties are already disclosed on a monthly basis and in a manner familiar to CMBS investors pursuant to the IRP. Requiring additional duplicative disclosure would add cost to the transactions without providing any real additional value.

IX. **Private Transactions**

The CRE Finance Council notes that the Re-Proposed Rules continue to discuss the concept of requiring CMBS issuers in privately offered transactions to provide information to investors, upon request, that they would have been required to provide if the transaction had been publicly offered. Our members would like to reiterate to the Commission that applying this rule to CMBS issuers would be detrimental to a significant sector of the CMBS market and ask that

the Commission re-evaluate our discussion with respect to this matter in our response letter to the initial proposed rules.

X.   <u>Conclusion</u>

The CRE Finance Council appreciates the Commission's consideration of our comments regarding the Re-Proposed Rules. We stand ready to provide any additional assistance that may be helpful.

Respectfully submitted,

Stephen M. Renna
Chief Executive Officer
CRE Finance Council

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(10)	Property Status. Specify the code that describes the status of the property.	1=in foreclosure 2=REO 3=defeased 4=partial release 5=substituted 6=same as at contribution	General Information	For CMBS, this item maps to "Property Status" which is field P18 in the CREFC IRP. The field is a property level field and would be reported multiple times for loans secured by multiple properties. The field is defined as providing a code showing status of property with the following code definitions (which match the SEC's proposal): 1 – In Foreclosure 2 – REO 3 – Defeased 4 – Partial Release 5 – Substituted 6 – same as at contribution
Item 3(d)(11)	Defeasance status. Indicate the code that describes defeasance status. A defeasance option is when an obligor may substitute other income-producing property for the real property without pre-paying the existing loan.	1=portion of loan previously defeased 2=full defeasance 3=no defeasance occurred 4=defeasance not allowable	General Information	For CMBS, this item maps to "Defeasance Status" which is field L98 in the CREFC IRP. However, we request that the SEC refine this item to allow for entry of existing IRP defined codes, which are alpha codes and not numeric as the SEC proposes. The field is defined as a code indicating if a loan has or is able to be defeased. See Defeasance Status Legend. When a loan becomes "Full Defeasance", at a minimum populate Property Status (P18) with 3, populate Property Type (P13) with SE, populate Property Name with "Defeased", and preceding year, second preceding year and most recent operating performance related data fields, lease and tenant related data fields and property condition related data fields should be left empty. Allowable codes are as follows: P – Portion of Loan Previously Defeased F – Full Defeasance N – No Defeasance Occurred X – Defeasance not Allowable
Items 3(d)(12), globally				For CMBS, this is a general comment relative to the financial information requested under Items 3(d)(12), but also applicable to all data in general. We would like the SEC to clarify in its final ruling that the data provided on the Schedule L-D, especially that information regarding financial information will reflect the information deemed ready for public consumption by the Servicer at the time that the Servicer is required to report the other monthly data points. When financial information is received from the borrowers, the Servicer needs to review and normalize the data before it is appropriate for public consumption. Additionally, this information may be received at various times during the month. Consequently, there is often a delay between when the Servicer receives the financial information and when the information can be made available on the Schedule L-D. Therefore, it should be clearly understood that the Issuer or its agent should not be required to restate prior reports or resubmit prior filings to reflect information that was received in a given reporting period but not yet available for reporting. This issue caused significant confusion and restatement of reports in regards to NOI reporting for significant obligors in Reg AB I.

Exhibit A - CREFC Comments to Proposed Schedule L-D

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(12)(i)	Financial reporting begin date. Specify the beginning date of the financial information presented in response to this subparagraph.	Date	General Information	For CMBS, this item maps directly to "Most Recent Financial As of Start Date" which is field L72 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the first day of the period for the most recent, hard copy operating statement {received by the servicer} (e.g. year to date or trailing 12 months) after the preceding fiscal year end statement. (Note - the beginning and end date of the operating statement from the borrower used to annualize should be reported.) If multiple properties and all the same start and end date, print start date. If missing any, leave empty.
Item 3(d)(12)(ii)	Financial reporting end date. Specify the ended date of the financial information presented in response to this paragraph.	Date	General Information	For CMBS, this item maps directly to "Most Recent Financial As Of End Date" which is field L73 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate. This field is defined as the last day of the period for the most recent, hard copy operating statement {received by the servicer} (e.g. year to date or trailing 12 months) after the preceding fiscal year end statement. (Note - the beginning and end date of the operating statement from the borrower used to annualize should be reported.) If multiple properties and all the same start and end date, print the end date. If missing any, the field will be empty.
Item 3(d)(12)(iii)	Revenue. Provide the total underwritten revenue from all sources of a property.	Number	General Information	For CMBS, this item maps directly to "Most Recent Revenue" which is field L66 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the total revenues for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the revenue of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(12)(iv)	Operating expenses. Provide the total operating expenses. Include real estate taxes, insurance, management fees, utilities, and repairs and maintenance.	Number	General Information	For CMBS, this field maps directly to "Most Recent Operating Expenses" which is field L67 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the total operating expenses for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. Included are real estate taxes, insurance, management fees, utilities and repairs and maintenance. Excluded are capital expenditures, tenant improvements, and leasing commissions. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the operating expenses of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.
Item 3(d)(12)(v)	Net operating income. Provide the total revenues less total underwritten operating expenses prior to application of mortgage payments and capital items for all properties.	Number	General Information	For CMBS, this field maps directly to "Most Recent NOI" which is field L68 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the total revenues less total operating expenses before capital items and debt service per the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the NOI of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.
Item 3(d)(12)(vi)	Net cash flow. Provide the total revenue less the total operating expenses and capital costs.	Number	General Information	For CMBS, this item maps directly to "Most Recent NCF" which is field L96 in the CREFC IRP (reported at the loan level). It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the total revenues less total operating expenses and capital items but before debt service per the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the NCF of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(12)(vii)	NOI/NCF indicator. Indicate the code that best describes how net operating income and net cash flow were calculated.	1=calculated using CMSA standard 2=calculated using a definition given in the pooling and servicing agreement 3=calculated using the underwriting method	General Information	For CMBS, this item maps directly to "NOI/NCF Indicator" which is field L90 in the CREFC IRP (reported at the loan level). However, we request that the SEC refine this item to allow for entry of existing IRP defined codes, which are alpha codes and not numeric as the SEC proposes. It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as requiring the code indicating the method used to calculate net operating income or net cash flow. See NOI/NCF Indicator Legend rule. If multiple properties and all the same, print the value. If missing any or the values are not the same, leave empty. Codes are as follows: 　CMSA – Calculated using CMSA (now CREFC) standard 　PSA – Calculated using a definition given in the Pooling and Servicing Agreement 　U/W – Calculated using the underwriting method
Item 3(d)(12)(viii)	DSCR (NOI). Provide the ratio of net operating income to debt service during the reporting period.	%	General Information	For CMBS, this item maps directly to "Most Recent DSCR (NOI)" which is field L70 in the CREFC IRP (reported at the loan level). However, we request that the SEC refine this item to allow for a numeric entry in lieu of the % currently indicated as the proposed response. It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as the a ratio of net operating income (NOI) to debt service for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), calculate the DSCR of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.
Item 3(d)(12)(ix)	DSCR (NCF). Provide the ratio of net cash flow to debt service during the reporting period	%	General Information	For CMBS, this item maps directly to "Most Recent DSCR (NCF)" which is field L97 in the CREFC IRP (reported at the loan level). However, we request that the SEC refine this item to allow for a numeric entry in lieu of the % currently indicated as the proposed response. It should be noted that there are instances of loans secured by multiple collateral properties. Given that the request is for loan level data, the information would be rolled up to the loan level, aggregating the property level information where appropriate and as provided for in the field definition. The field is defined as a ratio of net cash flow (NCF) to debt service for the most recent financial operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), calculate the DSCR of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(12)(x)	DSCR indicator. Indicate the code that describes how the debt service coverage ratio was calculated.	1=Average - Not all properties received financials, servicer allocates debt service only to properties where financial statements are received. 2=Consolidated - All properties reported on one "rolled up" financial statement from the borrower. 3=Full - All financial statements collected for all properties. 4=None collected - No financials were received 5=Partial - Not all properties received financial statements, servicer to leave empty. 6="Worst-Case" - Not all properties received financial statements, servicer allocates 100% of debt service to all properties where financial statements are received.	General Information	For CMBS, this item maps directly to "Most Recent DSCR Indicator" when referring to the most recent financial performance which is field L89 in the CREFC IRP. However, we request that the SEC refine this item to allow for entry of existing IRP defined codes, which are alpha codes and not numeric as the SEC proposes. The field is defined as a code that describes how DSCR is calculated for the most recent financial operating statement, as reported by the servicer, after the preceding fiscal year end statement. The field requires entry of the following codes: A - Average - Not all properties received financials, servicer allocates Debt Service only to properties where financials are received. C - Consolidated - All properties reported on one "rolled up" financial from the borrower F - Full - All statements collected for all properties N - None Collected - no financials were received P - Partial - Not all properties received financials, servicer to leave empty W - Worse Case - Not all properties received financials, servicer allocates 100% of the Debt Service to all properties where financials are received. Requiring this information in the numeric code proposed by the SEC will cause an undue programming burden when the information is readily available in the existing code format.
Item 3(d)(13)	Largest tenant. Identify the tenant that leases the largest square feet of the property (based on the most recent annual lease rollover review).	Text	General Information	For CMBS, this item maps directly to "Largest Tenant" which is field P37 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as, at the property level, the name of the tenant that leases the largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(14)	Square feet of the largest tenant. Provide total square feet lease by the largest tenant.	Number	General Information	For CMBS, this item maps directly to "Square Feet of Largest Tenant" which is field P38 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as total square feet leased by the largest tenant in field P37 (Largest Tenant). Based on the most recent annual lease roll over review. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.

Exhibit A - CREFC Comments to Proposed Schedule L-D

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(15)	Lease expiration of largest tenant. Provide the date of lease expiration for the largest tenant.	Date	General Information	For CMBS, this item maps directly to "Date of Lease Expiration of Largest Tenant" which is field P86 of the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. This field is defined as the lease term expiration and is the companion field for "Largest Tenant" (P37) and "Square Feet of Largest Tenant" (P38). Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(16)	Second largest tenant. Identify the tenant that leases the second largest square feet of the property (based on the most recent annual lease rollover review).	Text	General Information	For CMBS, this item maps directly to "Second Largest Tenant" which is field P39 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as, at the property level, the name of the tenant that leases the second largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(17)	Square feet of the second largest tenant. Provide the total square feet leased by the second largest tenant.	Number	General Information	For CMBS, this item maps directly to "Square Feet of Second (2nd) Largest Tenant" which is field P40 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as total square feet leased by the second largest tenant in field P39 (Second Largest Tenant). Based on the most recent annual lease roll over review. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(18)	Lease expiration of second largest tenant. Provide the date of lease expiration for the second largest tenant.	Date	General Information	For CMBS, this item maps directly to "Date of Lease Expiration of Second (2nd) Largest Tenant" which is field P87 of the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. This field is defined as the lease term expiration and is the companion field for "Second Largest Tenant" (P39) and "Square Feet of Second (2nd) Largest Tenant" (P40). Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(19)	Third largest tenant. Identify the tenant that lease the third largest square feet of the property (base on the most recent annual lease rollover review).	Text	General Information	For CMBS, this item maps directly to "Third Largest Tenant" which is field P41 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as, at the property level, the name of the tenant that leases the third largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.

Proposed Item Number	Proposed Title and Definition	Proposed Reponses	Proposed Category of Information	CREFC Response to SEC
Item 3(d)(20)	Square feet of the third largest tenant. Provide the total square feet leased by the third largest tenant.	Amount	General Information	For CMBS, this item maps directly to "Square Feet of Third (3rd) Largest Tenant" which is field P42 in the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. The field is defined as total square feet leased by the 3rd largest tenant in field P41 (Third Largest Tenant). Based on the most recent annual lease roll over review. Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.
Item 3(d)(21)	Lease expiration of the third largest tenant. Provide the date of the lease expiration for the third largest tenant.	Date	General Information	For CMBS, this item maps directly to "Date of Lease Expiration of Third (3rd) Largest Tenant" which is field P88 of the CREFC IRP. This information is provided at the property level, which is an important distinction since there are cases of individual loans that are secured by multiple properties. This field is defined as the lease term expiration and is the companion field for "Third Largest Tenant" (P41) and "Square Feet of Third (3rd) Largest Tenant" (P42). Note: this will be the most recent information available from the servicer, as reported in the existing IRP reports.

EXHIBIT B

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Prospectus Loan ID	Item 1(b)	L4	AN	123	The identification number(s) assigned to each asset in the annex of the prospectus supplement. For a partial defeasance where the loan is bifurcated, the Prospectus Loan ID for the original/non-defeased loan is appended with an "A", and the new/defeased loan is appended with a "B".	
Group ID	Item 1(c)	L2	AN	XXX9701A	The alpha-numeric code assigned to each loan group within a securitization. A Group ID may not be applicable for every transaction.	
Distribution Date	Item 1(d)	L5	AN	YYYYMMDD	Date on which funds are distributed to certificateholders for a particular period as defined in the servicing agreement.	
Other Principal Adjustments	Item 1(f)(5)	L28	Numeric	1000.00	Any other amounts that would cause the principal balance of the loan to be decreased or increased in the current period which are not considered Unscheduled Principal Collections and are not Scheduled Principal Amounts. Examples include cash and non-cash adjustments necessary to synchronize the servicer's records with the securitized collateral supporting the outstanding bonds. A negative amount should be reported for an increase in the balance, and a positive amount should be reported for a decrease in the balance.	
Other Interest Adjustment	Item 1(f)(6)	L102	Numeric	1000.00	Companion field for Other Principal Adjustments (L28) to show unscheduled interest adjustments for the related collection period.	
Actual Balance	Item 1(f)(7)	L36	Numeric	100000.00	Outstanding actual balance of the loan as of the determination date. This figure represents the legal remaining outstanding principal balance related to the borrower's mortgage note. For partial defeasances, the balance should reflect the appropriate allocation of the balance prior to the defeasance between the non-defeased and defeased loans based on the provisions of the loan documents.	
Current Ending Scheduled Balance	Item 1(f)(8)	L7	Numeric	100000.00	The scheduled or stated principal balance for a loan (defined in the servicing agreement) as of the end of the reporting period, which is usually the current determination date. This balance is usually determined by considering scheduled and unscheduled principal payments received during the collection period relating to the Distribution Date. A realized loss will also have an impact on this balance during the period it is reported. For split note/loans, this should include the balance in the related trust. For full and partial defeasances, the balance should reflect the appropriate allocation of the balance prior to the defeasance between the non-defeased and defeased loans based on the provisions of the loan documents.	
Total Scheduled P&I Due	Item 1(f)(9)	L25	Numeric	1000.00	The total amount of principal and interest due on the loan in the month corresponding to the current distribution date and should equal the sum of fields L23 and L24.	
Scheduled Principal Amount	Item 1(f)(10)	L24	Numeric	1000.00	The amount of principal to be paid to the trust for the current distribution period that represents a regularly scheduled principal payment. The value is derived by subtracting the Scheduled Interest Amount from the Total Scheduled P&I Due. This amount may not be the same as the amount of principal scheduled to be paid by the borrower for the related payment date. If loan has been deemed non-recoverable, then populate with zero.	
Scheduled Interest Amount	Item 1(f)(11)	L23	Numeric	1000.00	The amount of gross interest scheduled to be paid to the trust for the current distribution period based on the trust's beginning scheduled principal balance and a full month's interest accrual amount. This amount may not be the same as the amount of gross interest scheduled to be paid by the borrower for the related payment date. If loan has been deemed non-recoverable, then populate with zero.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Payment Status of Loan	Item 1(f)(12)	L40	AN	1	See Status of Loan legend. Codes should be populated in the following order of priority (top priority listed first): 5 - Non Performing Matured Balloon 4 - Performing Matured Balloon 3 - 90+ Days Delinquent 2 - 60-89 Days Delinquent 1 - 30-59 Days Delinquent 0 - Current B - Late Payment But Less Than 30 days Delinquent A - Payment Not Received But Still In Grace Period or Not Yet Due	5 - Non Performing Matured Balloon 4 - Performing Matured Balloon 3 - 90+ Days Delinquent 2 - 60-89 Days Delinquent 1 - 30-59 Days Delinquent 0 - Current B - Late Payment But Less Than 30 days Delinquent A - Payment Not Received But Still In Grace Period or Not Yet Due
Paid Through Date	Item 1(f)(14)	L8	AN	YYYYMMDD	Date the loan's scheduled principal and interest is paid through as of the determination date. One frequency less than the due date for the loan's next scheduled payment. For split loans/notes, this is the date the scheduled principal and interest for the split loan/note piece has been paid through.	
Payment Frequency	Item 1 (f)(16)	S32	Numeric	1	Code representing the frequency mortgage loan payments are required to be made. See Payment Frequency Legend.	1 - Monthly 3 - Quarterly 6 - Semi-Annually 12 - Annually 365 - Daily
Note Rate At Contribution	Item1(f)(17)	S45	Numeric	0.095	The annual gross rate used to calculate interest for the loan at the closing date of the transaction.	
Next Note Rate	Item1(f)(17) Item 3(a)(4)(i), Item 3(c)(3)	L20	Numeric	0.09	Annualized gross interest rate that will be used to determine the next scheduled interest payment. If loan is not an adjustable rate mortgage (ARM), or if rate is not yet available as of the current reporting period, then leave field empty.	
Maturity Date	Item 1(f)(18), Item 3(a)(1), Item 3(c)(5)	L11	AN	YYYYMMDD	Date final scheduled payment is due per the loan documents. Not the same as anticipated repayment date related to hyper-amortization loans. If the loan has been defeased and the loan agreement provided for, or the servicer has consented to, prepayment prior to maturity in connection with a defeasance, this represents the date the Trust can expect full repayment. The borrower may have the right to pre-pay the defeased loan prior to the final scheduled payment date in accordance with the loan documents.	
Most Recent Special Servicer Transfer Date	Item 1(g)(3)	L77	AN	YYYYMMDD	The date a loan becomes a "specially serviced loan", which is the date of the transfer letter, e-mail, etc. provided by the Master Servicer which is accepted by the Special Servicer. Note: If the loan has had multiple transfers, this should be the last date transferred to special servicing.	
Most Recent Master Servicer Return Date	Item 1(g)(3)	L78	AN	YYYYMMDD	The date a loan becomes a "corrected mortgage loan", which is the date of the return letter, email, etc. provided by the Special Servicer which is accepted by the Master Servicer. Note: If the loan has had multiple transfers, this should be the last date returned to the Master Servicer from the Special Servicer.	
Total P&I Advance Outstanding	Item 1(g)(4)	L37	Numeric	1000.00	Total outstanding principal and interest advances made (or scheduled to be made by distribution date) by the servicer(s) as of the determination date per the servicing agreement. Amount should also include advances reported by the special servicer in SS Total P&I Advance Outstanding (D9).	
Total T&I Advance Outstanding	Item 1(g)(4)	L38	Numeric	1000.00	Total outstanding tax & insurance advances made by the servicer(s) as of the determination date per the servicing agreement. Amount should also include advances reported by the special servicer in SS Total T&I Advance Outstanding (D10).	
Other Expense Advance Outstanding	Item 1(g)(4)	L39	Numeric	1000.00	Total outstanding other or miscellaneous advances made by the servicer(s) as of the determination date. This amount does not include P&I or T&I advances. Amount should also include advances reported by the special servicer in SS Other Expense Advance Outstanding (D11).	
Non Recoverability Determined	Item 1(g)(7)	L110	AN	Y	Indicator (Y/N) as to whether the Master Servicer/Special Servicer has ceased advancing (P&I and/or Servicing) for the related mortgage loan.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Date of Last Modification	Item 1(h), Item 3(c)(1)	L48	AN	YYYYMMDD	Date of most recent modification. If no modification has occurred, then field should be left empty. For further clarification, a modification would include any material change to the existing loan documents, excluding assumptions.	
Liquidation/Prepayment Date	Item 1(i)(2)	L29	AN	YYYYMMDD	The effective date on which an unscheduled principal payment or liquidation proceeds are received.	
Liquidation/Prepayment Code	Item 1(j)	L32	Numeric	1	Code assigned to any unscheduled principal payments or liquidation proceeds received during the collection period. See Liquidation/Prepayment Code Legend.	1 - Partial Liquidation (Curtailment) 2 - Payoff Prior to Maturity 3 - Disposition/Liquidation 4 - Repurchase/Substitution 5 - Full Payoff at Maturity 6 - Discounted Payoff (DPO) 8 - Payoff w/ penalty 9 - Payoff w/ Yield Maintenance 10 - Curtailment w/ Penalty 11 - Curtailment w/Yield Maintenance
Realized Loss to Trust	Item 1(k)(1)	L47	Numeric	10000.00	A loan level calculation that is the difference between Net Proceeds (after Liquidation Expenses) and Current Beginning Scheduled Balance (L6) on the Servicer Realized Loss Template.	
Number of Properties	Item 3(a)(2), Item 3(d)(1)	L86	Numeric	13.00	The current number of properties which serve as mortgage collateral for the loan. This number should not include defeasance collateral, therefore if a loan is fully defeased, field should be populated with zero.	
Current Hyper Amortizing Date	Item 3(a)(3)	L81	AN	YYYYMMDD	Current anticipated repayment date, after which principal and interest may amortize at an accelerated rate, and/or interest expense to mortgagor increases substantially as per the loan documents. This is an incentive for mortgagor to repay loan principal amount on or before this date. Date will be the same as at setup unless the loan is modified and a new date is assigned. If not applicable (i.e., in the case of defeasance), then leave field empty.	
Next Rate Adjustment Date	Item 3(a)(4)(ii)	L21	AN	YYYYMMDD	For adjustable rate loans, the next date that the note rate is scheduled to change. If loan is not an adjustable rate mortgage (ARM), then leave field empty.	
Next Payment Adjustment Date	Item 3(a)(4)(iv)	L22	AN	YYYYMMDD	For adjustable rate loans, the date that the amount of scheduled principal and/or interest is next scheduled to change. If loan is not an adjustable rate mortgage (ARM), then leave field empty.	
Negative Amortization/Deferred Interest Capitalized Amount	Item 3(a)(5)	L26	Numeric	1000.00	Any amount for the current reporting period that represents negative amortization or deferred interest that is capitalized (added to) the principal balance. Negative amortization occurs when interest accrued for the period exceeds the scheduled principal and interest payment. The excess accrued interest is added to the principal balance of the loan. Deferred interest occurs when interest accrued for the period exceeds the amount of interest required to be paid for the period, and the amount is capitalized (added to) the principal balance. This field should be populated with amounts that impact the principal balance but do not effect collections.	
Deferred Interest - Cumulative	Item 3(a)(5)(i)	L125	Numeric	1000.00	Deferred interest occurs when interest accrued for the period exceeds the amount of interest required to be paid for the period. The requirement to pay the excess accrued interest is deferred to a future period. This field should be populated with the cumulative deferred interest for the current and prior reporting periods net of any Deferred Interest Collected.	
Deferred Interest Collected	Item 3(a)(5)(ii)	L126	Numeric	1000.00	Amount of deferred interest that is collected for the current reporting period.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Workout Strategy	Item 3(b)	L76	Numeric	1	The code assigned that best describes the steps being taken to resolve the loan. Specific codes apply. See Workout Strategy Legend.	1=Modification 2=Foreclosure 3=Bankruptcy 4=Extension 5-Note Sale 6=DPO 7=REO 8=Resolved 9=Pending Return to Master Servicer 10=Deed in Lieu Of Foreclosure 11=Full Payoff 12=Reps and Warranties 13=Other or TBD
Modified Note Rate	Item 3(c)(2)	L50	Numeric	0.09	The new initial interest rate to which the loan was modified.	
Modified Payment Amount	Item 3(c)(4)	L51	Numeric	1000.00	The new initial P&I payment amount to which the loan was modified.	
Property Name	Item 3(d)(1)	S55	AN	Text	The name of the property which serves as mortgage collateral. If the property has been defeased, populate with "Defeased". For loan level reporting, if multiple properties, print "Various". For substituted properties, populate with the new property name.	
Property Zip Code	3(d)(2)	S59	AN	Text	The zip (or postal) code for the property or properties which serve as mortgage collateral. If the property has been defeased, then leave field empty. For loan level reporting, if multiple properties have the same zip code then print the zip code, otherwise print "Various". If missing information, print "Incomplete". For substituted properties, populate with the new property zip code.	
Property Type	3(d)(3)	S61	AN	MF	Code assigned to a property from the Property Type Legend based on how the property is used. If the property has been defeased, populated with "SE". For loan level reporting, if multiple property types, print "XX". If missing information, print "ZZ". For substituted properties, populate with the new property type.	MF – Multifamily RT – Retail HC – HealthCare IN – Industrial WH – Warehouse MH – Mobile Home Park OF – Office MU – Mixed Use LO – Lodging SS – Self Storage OT – Other SE – Securities CH – Cooperative Housing
Current Net Rentable Square Feet	Item 3(d)(4)	P16	Numeric	25000.00	The current net rentable square feet area of a property as of the determination date. This field should be utilized for Office, Retail, Industrial, Warehouse, and Mixed Use properties. If there are multiple properties, and all the same Property Type, sum the values. If not all the same Property Type or if any are missing, then leave field empty.	
Current Number of Units/Beds/Rooms	Item 3(d)(5)	P17	Numeric	75.00	The current number of units/beds/rooms of a property as of the determination date. This field should be utilized for Multifamily, Cooperative Housing, Mobile Home Parks and Self Storage (units), Healthcare (beds), and Lodging (rooms). If there are multiple properties, and all the same Property Type, sum the values. If not all the same Property Type or if any are missing, then leave field empty.	
Year Built	Item 3(d)(6)	S64	AN	YYYY	The year the property was built. For multiple properties, if all the same print the year, else leave empty.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Most Recent Value	Item 3(d)(7)	L75	Numeric	100000.00	The most recent opinion of estimated value of all properties, which could include appraisals, BPOs, or internal estimates. This value should be the same as Valuation Amount at Contribution until a new value is obtained. This may not tie to the value used for ARA/ASER calculations if other values are obtained before or after this calculation. If multiple properties, sum the value. If missing any, leave empty. If defeased, leave empty.	
Most Recent Valuation Date	Item 3(d)(8)	L74	AN	YYYYMMDD	The date the most recent opinion of estimated value (as reported in Most Recent Value L75, P25, D26) was effective. If multiple properties and all the same date, print date. If missing any, leave empty. If defeased, leave empty.	
Most Recent Physical Occupancy	Item 3(d)(9)	L71	Numeric	0.85	The most recent available percentage of rentable space occupied. Should be derived from a rent roll or other document indicating occupancy consistent with most recent documentation. If property is vacant, input zero. If multiple properties, populate with the weighted average based on square feet or units. If missing any, leave empty at the loan level.	
Property Status	Item 3(d)(10)	P18	AN	1.00	Code showing status of property. See Property Status Legend.	1 – In Foreclosure 2 – REO 3 – Defeased 4 – Partial Release 5 – Substituted 6 – same as at contribution
Defeasance Status	Item 3(d)(11)	L98	AN	Text	A code indicating if a loan has or is able to be defeased. See Defeasance Status Legend. When a loan becomes "Full Defeasance", at a minimum populate Property Status (P18) with 3, populate Property Type (P13) with SE, populate Property Name with "Defeased", and preceding year, second preceding year and most recent operating performance related data fields, lease and tenant related data fields and property condition related data fields should be left empty.	P – Portion of Loan Previously Defeased F – Full Defeasance N – No Defeasance Occurred X – Defeasance not Allowable
Most Recent Financial As of Start Date	Item 3(d)(12)(i)	L72	AN	YYYYMMDD	The first day of the period for the most recent, hard copy operating statement (e.g. year to date or trailing 12 months) after the preceding fiscal year end statement. (Note - the beginning and end date of the operating statement from the borrower used to annualize should be reported.) If multiple properties and all the same start and end date, print start date. If missing any, leave empty.	
Most Recent Financial As of End Date	Item 3(d)(12)(ii)	L73	AN	YYYYMMDD	The last day of the period for the most recent, hard copy operating statement (e.g. year to date or trailing 12 months) after the preceding fiscal year end statement. (Note - the beginning and end date of the operating statement from the borrower used to annualize should be reported.) If multiple properties and all the same start and end date, print the end date. If missing any, leave empty.	
Most Recent Revenue	Item 3(d)(12)(iii)	L66	Numeric	1000.00	Total revenues for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the revenue of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	
Most Recent Operating Expenses	Item 3(d)(12)(iv)	L67	Numeric	1000.00	Total operating expenses for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. Included are real estate taxes, insurance, management fees, utilities and repairs and maintenance. Excluded are capital expenditures, tenant improvements, and leasing commissions. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the operating expenses of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Most Recent NOI	Item 3(d)(12)(v)	L68	Numeric	1000.00	Total revenues less total operating expenses before capital items and debt service per the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the NOI of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	
Most Recent NCF	Item 3(d)(12)(vi)	L96	Numeric	1000.00	Total revenues less total operating expenses and capital items but before debt service per the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), total the NCF of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	
NOI/NCF Indicator	Item 3(d)(12)(vii)	L90	AN	Text	Code indicating the method used to calculate net operating income or net cash flow. See NOI/NCF Indicator Legend rule. If multiple properties and all the same, print the value. If missing any or the values are not the same, leave empty.	CMSA – Calculated using CMSA (now CREFC) standard PSA – Calculated using a definition given in the Pooling and Servicing Agreement U/W – Calculated using the underwriting method
Most Recent DSCR (NOI)	Item 3(d)(12)(vii)	L70	Numeric	2.55	A ratio of net operating income (NOI) to debt service for the most recent operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), calculate the DSCR of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	
Most Recent DSCR (NCF)	Item 3(d)(12)(ix)	L97	Numeric	1000.00	A ratio of net cash flow (NCF) to debt service for the most recent financial operating statement reported by the servicer (e.g. year to date, year to date annualized, or trailing 12 months, but all normalized) after the preceding fiscal year end statement. If multiple properties exist and the related data is comparable (same financial indicators and same financial start and end dates), calculate the DSCR of the underlying properties. If multiple properties exist and comparable data is not available for all properties or if received/consolidated, populate using the DSCR Indicator Legend rule.	

Field Name	SEC Item Number (or closest match)	CREFC IRP Field Number	Type	Format Example	CREFC IRP 5.0 Definition	CREFC IRP 5.0 Legend (If applicable)
Most Recent DSCR Indicator	Item 3(d)(12)(x)	L89	AN	Text	Code describing how DSCR is calculated for the most recent financial operating statement, as reported by the servicer, after the preceding fiscal year end statement. See DSCR Indicator Legend.	A - Average - Not all properties received financials, servicer allocates Debt Service only to properties where financials are received. C - Consolidated - All properties reported on one "rolled up" financial from the borrower F - Full - All statements collected for all properties N - None Collected - no financials were received P - Partial - Not all properties received financials, servicer to leave empty W - Worse Case - Not all properties received financials, servicer allocates 100% of the Debt Service to all properties where financials are received.
Largest Tenant	Item 3(d)(13)	P37	AN	Text	At a property level the name of the tenant that leases the largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable.	
Square Feet of Largest Tenant	Item 3(d)(14)	P38	Numeric	15000.00	Total square feet leased by the largest tenant in field P37. Based on the most recent annual lease roll over review.	
Date of Lease Expiration of Largest Tenant	Item 3(d)(15)	P86	AN	YYYYMMDD	Lease term expiration. Companion field for P37 & P38	
Second Largest Tenant	Item 3(d)(16)	P39	AN	Text	At a property level the name of the tenant that leases the second largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable.	
Square Feet of Second (2nd) Largest Tenant	Item 3(d)(17)	P40	Numeric	15000.00	Total square feet leased by the 2nd largest tenant in P39. Based on the most recent annual lease roll over review.	
Date of Lease Expiration of Second (2nd) Largest Tenant	Item 3(d)(18)	P87	AN	YYYYMMDD	Lease term expiration. Companion field for P39 & P40	
Third Largest Tenant	Item 3(d)(19)	P41	AN	Text	At a property level the name of the tenant that leases the third largest square feet of the property based on the most recent annual lease rollover review. If tenant is not occupying the space but is still paying rent, the servicer may print "Dark" after tenant name. If tenant has sub-leased space, may print "Sub-leased/name" after tenant name. For Office, Warehouse, Retail, Industrial, Other or Mixed Use property types as applicable.	
Square Feet of Third (3rd) Largest Tenant	Item 3(d)(20)	P42	Numeric	15000.00	Total square feet leased by the 3rd largest tenant in P41. Based on the most recent annual lease roll over review.	
Date of Lease Expiration of Third (3rd) Largest Tenant	Item 3(d)(21)	P88	AN	YYYYMMDD	Lease term expiration. Companion field for P41 & P42	