

Servicer Evaluation: World Omni Financial Corp./Center One Financial Services

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Table Of Contents

Opinion

Outlook

Profile

Management And Organization

Consumer Finance – Automobile Loan And Lease Administration

Financial Position

Servicer Evaluation: World Omni Financial Corp./Center One Financial Services

Opinion

Standard & Poor's Ratings Services maintains a STRONG ranking on World Omni Financial Corp./CenterOne Financial Services LLC (WO/CO), a wholly owned subsidiary of JM Family Enterprises Inc., located in Deerfield Beach, Fla., as a consumer finance–automobile loan and lease servicer. We also maintained our STRONG subrankings for management and organization and loan administration and our sufficient ranking for financial position.

We base the overall ranking on our assessment of WO/CO's management team, which we consider highly experienced, internal controls and risk management, high level of automation, policies and procedures (P&P), which we consider thorough, training regimen, demonstrated default and asset management expertise, and execution of strategic business initiatives. WO/CO indicates it continues to enhance its servicing operations through initiatives that, in our opinion, improve technology and telephony administration, reengineer workflows and processes, enhance the company's Web site, and enrich the customers' experience. The company has said it extracts highly motivated employees from its staff to lead improvement initiatives and administer projects. In addition, over the past year, management has informed us of opening another servicing location for customer service and collection. This location is in Deerfield Beach, Fla.

The company maintains a number of managerial reports to monitor its servicing operations, and the company has indicated it continues to search for alternatives to strengthen its internal controls. Based on metrics provided through Standard & Poor's Servicer Evaluation Analytical Methodology (SEAM) questionnaire, the company compares favorably with other servicers we monitor.

In our view, WO/CO's strategic business initiatives, experienced management team, solid level of automation, default and asset management expertise, and persistent improvement in its operating efficiencies through investments in technology generally appear to be helping the company effectively minimize portfolio risk and maintain sound internal controls and servicing practices.

Outlook

The outlook is stable. Based on our review, we believe WO/CO is committed to continuously improving its performance and profits by effectively managing its automobile loan and lease servicing portfolio. The company appears to capitalize on its management experience, level of automation, and internal controls to execute its servicing strategy. WO/CO also seems to leverage its servicing capacity by providing third-party servicing of automobile and other motor vehicle loans and leases. Although the economic environment has effect WO/CO's servicing growth over the past few years, the servicer has experienced minimal net growth in the first six months of 2010. We believe WO/CO's servicing business should grow as the economy recovers, and we expect WO/CO to remain a highly competent automobile and other motor vehicle loan and lease servicer.

Chart 1

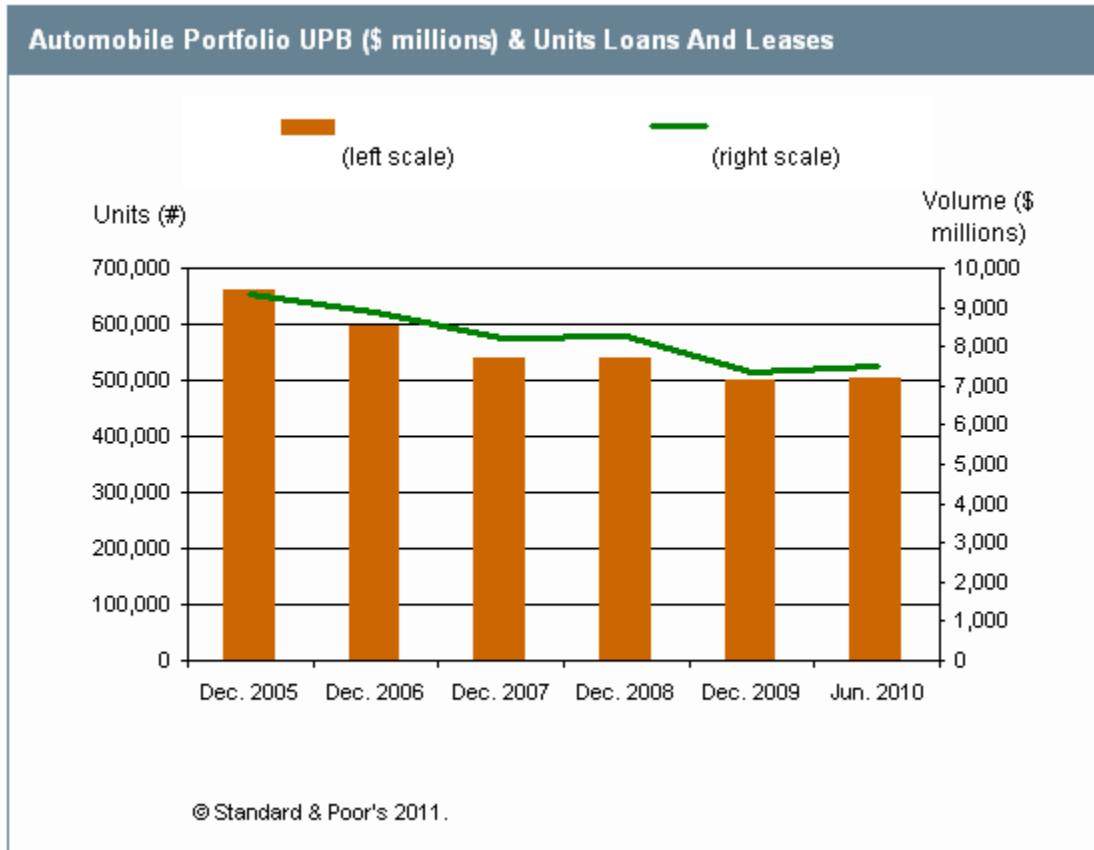
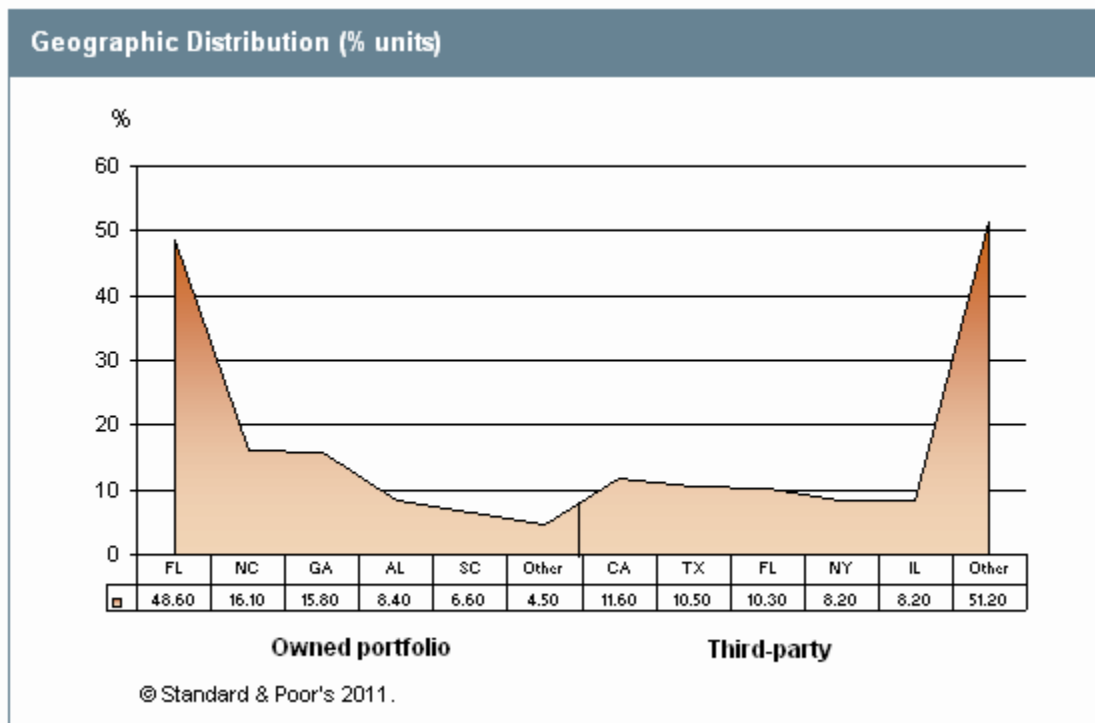


Table 1

Delinquency Statistics June 2010							
	30 days (%)	60 days (%)	90+ days (%)	Total delinquency (% of loans)	Bankruptcy (%)	Charge-off (%)	Repo
Loans	1.71	0.34	0.06	2.11	1.83	0.24	774
Leases	0.89	0.16	0.02	1.07	1.49	0.28	251

Chart 2



Profile

JM Family Enterprises Inc. (JMFE), the ultimate parent of WO/CO, is an \$8.4 billion automotive company headquartered in Deerfield Beach, Fla. Jim Moran founded JMFE in 1968 and has grown from a core distribution business into a diversified automotive enterprise whose principal business focus is on vehicle distribution and processing, finance and third-party services, and insurance activities.

World Omni was founded in 1981 as the first import brand captive finance company. It is a diversified automotive finance company providing a broad range of financial services to consumers, dealers, and lenders. World Omni provides indirect consumer retail and lease financing, commercial real estate, and floor plan finance programs.

CenterOne, a division of World Omni, was established in March 2000 to provide third-party servicing for motor vehicle sales finance and lease contracts and other titled assets. CenterOne also develops customized servicing solutions with its clients. In addition, it establishes agreed-upon servicing strategies, key performance indicators, and guidelines. CenterOne also grants systems access, produces data downloads, and provides managerial reports to its clients.

Management And Organization

Standard & Poor's has a STRONG subranking on WO/CO for management and organization.

Management and staff recruitment, development, and training

In our opinion, WO/CO has an experienced management team, comprehensive and clear policies and procedures (P&P), training programs, and a sound level of automation. The company maintains a tenured senior management team that we believe contributes to a stable loan servicing environment. According to the company, the management team maintains the following attributes:

- Senior managers average 31 years of industry experience, including more than 20 years tenure with the company;
- Middle managers average 17 years of industry experience, including 13 years tenure with the company; and
- As of June 30, management and staff turnover was 17% and 24%, respectively.

In our opinion, WO/CO maintains a comprehensive training regimen for new and existing employees with dedicated education and development personnel. Curricula are, in our view, well structured, and designed and updated as needed. According to company policies, new employees are required to attend orientation classes that include the company's code of ethics, P&P (policies and procedures), motor vehicle records and policy, and job-related training, all of which total about 120 hours of program time.

Since our last review, the company reports that it has reorganized its training services operations "to better coordinate all training activities." The company has developed a proprietary application it calls "Diamond Technique" that uses fundamental phases and talk tracks to provide collectors with a word path to overcome customers reasons for delinquency. WO/CO continues to invest and enhance its computer-based training delivery platform for its employees including a leadership assessment and development program for potential supervisors, as well as programs to develop existing frontline leaders. Other characteristics of the training environment reported by management include:

- A centralized training department;
- A new hire orientation program that includes 30 hours of introductory training;
- New hires for call center work in customer service and collections receive eight weeks and 18 weeks, respectively, of classroom and on-the-job training that includes 23 hours of Fair Debt Collection Practices Act (FDCPA) education. FDCPA testing is administered to associates annually;
- Task-specific activities that are unique to a particular position, including soft-skill enhancement for effective communication with customers and use of various tools and equipment;
- Close monitoring of on-the-job performance (OTJ) with immediate feedback;
- Leadership development to further strengthen managers' skills and ultimately the WO/CO management team;
- JMF-university provides a variety of educational programs for employees at all levels;
- Industry and job-related conferences and seminars for managers and supervisors; and
- Electronic tracking for all education and training.

Internal controls

Standard & Poor's believes that WO/CO demonstrates sound controls in developing, drafting, and disseminating its loan and lease servicing P&P. A compliance manager is responsible for the integrity, updates and coordination of the review process for servicing P&P. Electronic workflow technologies deliver and enforce the servicing P&P for each portfolio serviced. The company has methodologies in place for reviewing and updating its P&P, including:

- P&P manuals are concise and clear with appropriate exhibits and template forms;
- The company's intranet makes its P&P available online. The company updates its P&P to align with operational, regulatory, third-party, and/or investor changes;

- Electronic bulletins communicate P&P updates and staff meetings and ensure consistency in servicing tasks; and
- Regular review of P&P, with changes approved through an authority level matrix, the compliance department, and the legal department when necessary.

WO/CO maintains, in our view, effective audit and quality programs, which provide applicable controls to safeguard the company and its investors against risk of loss due to noncompliance with company, investor, and/or regulatory guidelines. According to JMFE's internal audit group (IAG), an audit plan is developed annually based upon a comprehensive risk assessment conducted by IAG and members of the executive management team. IAG will conduct periodic meetings with executive management to discuss significant changes in the risk environment and amend the audit plan, accordingly. During an audit review and according to their policies, all audit findings are discussed with management, and issues deemed insignificant can be resolved verbally. Issues considered significant will appear in a written audit report along with a recommendation(s) for enhancement and are distributed to executive management. Servicing management must respond to findings and provide a corrective action plan. The audit methodology employed encompasses:

- Annual audits of key servicing departments;
- Assignment of a risk rating to each area, which can change based on previous audit results; and
- Tracking and reporting of outstanding findings until resolution.

A review of completed audit reports performed in 2009 and 2010 did not reveal any significant findings in our view, and management has represented that it has addressed identified issues in a reasonable time period. An independent CPA firm examined WO/CO management's assertion that it complied with the servicing criteria set forth in item 1122(d) of the Securities and Exchange Commission's Regulation AB for all asset-backed securities transactions backed by automobile and light truck retail installment sale contracts. The firm's opinion is that WO/CO's assertion is fairly stated.

According to company management, WO/CO continues to ensure the quality of its servicing staff through monthly employee reviews. The reviews examine experience levels, acceptable error rates, and fundamental servicing expectations. WO/CO's stated goal is to provide immediate feedback to each employee, relative to the review results, along with suggestions for improvement.

Management has represented that pending legal matters are not likely to be material.

Technology

In our opinion, WO/CO has a highly automated environment using a combination of vendor and proprietary systems. The company uses proprietary and purchased software applications for quick management of borrower inquiries, collection communication, and payment initiatives, as well as to provide control reports and data monitoring management alarms to ensure continual business operations and recovery. JMFE's shared services company, JM Service Center LLC (JMSC), provides the information systems and technology to support servicing activities. IT management reports that business critical systems are replicated in two primary data centers in Deerfield Beach and Alpharetta, Ga.. Management represents that systems architecture and capacity is sufficient to support projected business growth. The company has a stated commitment to continuous process improvement and to enhancing its technology and servicing applications, and its system architecture includes the following:

- Loan and lease servicing records are housed on Advanced Consumer Loan System (ACLS) and LeMans Lease Master II System (LeMans), respectively;

- FiServ loan origination system with the Monetrics, a World Omni subsidiary, decision engine is intended to allow for increased marketing flexibility, risk-based pricing, and other control/risk management tools;
- Mail tracking "Planet Code" is applied to each billing statement turnaround coupon. This code is electronically captured through the postal system when the payment is placed in the mail. A broadcast from the planet code host system to ACLS and LeMans enables WO/CO to update its collection calling campaigns;
- The STRATA® Enterprise (CGI-AMS product) applications interface with ACLS and LeMans provides a host of behavior models that assign and manage effective collection strategies;
- Predictive autodialer technology coordinates and performs various calling campaigns;
- Outbound interactive voice message technology is employed to identify the right party and then automatically direct the call to a collection agent;
- An automated call distribution system (ACD) is employed and managed through the call management system which, in conjunction with the voice response unit (VRU), routes incoming customer inquiries to specific customer service representatives predicated upon their skill sets;
- Risk decision software, Monetrics, a WOFC subsidiary, predicts frequency and severity of loan defaults by evaluating WO/CO's servicing portfolio;
- Redundant firewalls are established to protect access in and out of the company's network;
- System disk-to-disk replication or backup tapes are produced daily, monthly, and annually, and are stored at an offsite archival facility; and
- The system network team administers security software to monitor traffic, accept or reject access requests, and log daily activity.

In addition WO/CO reports, system architecture employs a number of proprietary systems, which include the following:

- An asset-backed securitization (ABS) system provides customized investor reporting on securitized portfolios;
- The dealer rate information system is a repository that includes the dealer reserve statement system, which is a subsystem that performs dealer reserve accounting;
- The monetary posting system (MPS) processes monetary and nonmonetary transactions;
- The servicer uses an asset management and telemarketing system to facilitate contact with customers nearing the end of their lease to discuss options;
- A vehicle prospector system facilitates contact with lease customers, tracks returned vehicles, and monitors collection of end of lease receivables;
- A dealer sales management system stores vehicle grounding information and market off-lease inventory;
- The vehicle remarketing management system (VRMS) maintains statistical marketing and historical data for vehicle inventory; and
- Electronic workflow and imaged customer account documents are available online.

According to management, WO/CO's disaster recovery and business continuity (DRBC) plan is developed with direct input from WOFC, JMFC, and the audit and consulting group to ensure that any business disruption is minimized. A dedicated plan administrator and assigned alternates provide guidance on the plan administration. Reported attributes of the plan include the following:

- JMFE uses a combination of high availability and fail over in its Alpharetta data center for the client server environment;
- At a minimum, annual testing of the DRBC plan is conducted, and JMFE's audit and consulting group validates

the test's administration;

- Formal testing results are presented to senior management;
- There is a three-tiered, business-unit functional criticality prioritization aligned with severity and days;
- A vital operations team consists of management within World Omni and JMFE, who make tactical and strategic decisions in the event of an emergency;
- The management team established the command center, which coordinates recovery efforts;
- An alternate service team reviews established time frames/work schedules upon their arrival at an alternative site;
- A support team coordinates and monitors all immediate response and recovery activities; and
- Identified employees, called the "Fly/Bus Out Team," have volunteered to relocate to support the company's DRBC plan.

Consumer Finance – Automobile Loan And Lease Administration

Standard & Poor's has a **STRONG** subranking on WO/CO for consumer finance-automobile loan and lease administration.

WO/CO automobile loan and lease servicing operations consist of approximately 640 employees located primarily in Earth City, Mo. and Mobile, Ala. As previously mentioned, the Deerfield Beach center now includes customer service and collection representatives. The combined loan and lease portfolios exceeded 502,000 accounts, with an unpaid principal balance (UPB) exceeding \$7.5 billion as of June 30, 2010. The geographic concentration of its owned portfolio continues to be in Florida. The high concentration of loans in Florida (49%) and other southeastern states is due to the business operations of WO/CO's parent, JMFE, which includes the Southeast Toyota distributorship headquartered in Deerfield Beach. Third-party portfolio geographic distribution reflects California as the highest concentration of loans at 12%.

Chart 3

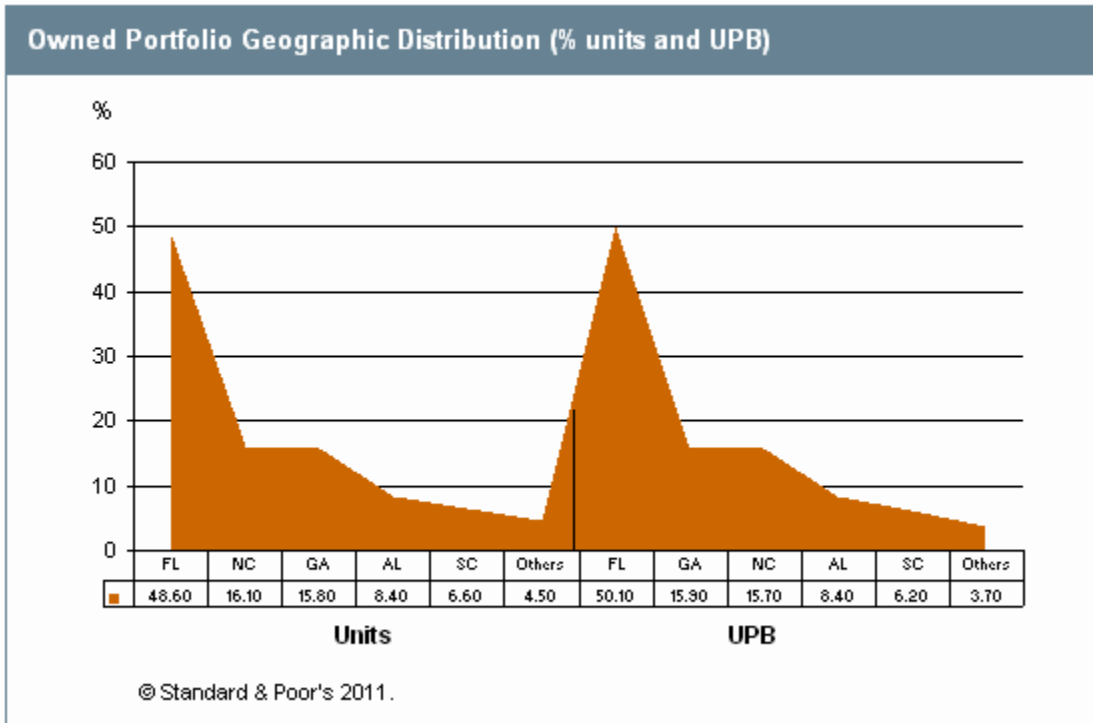
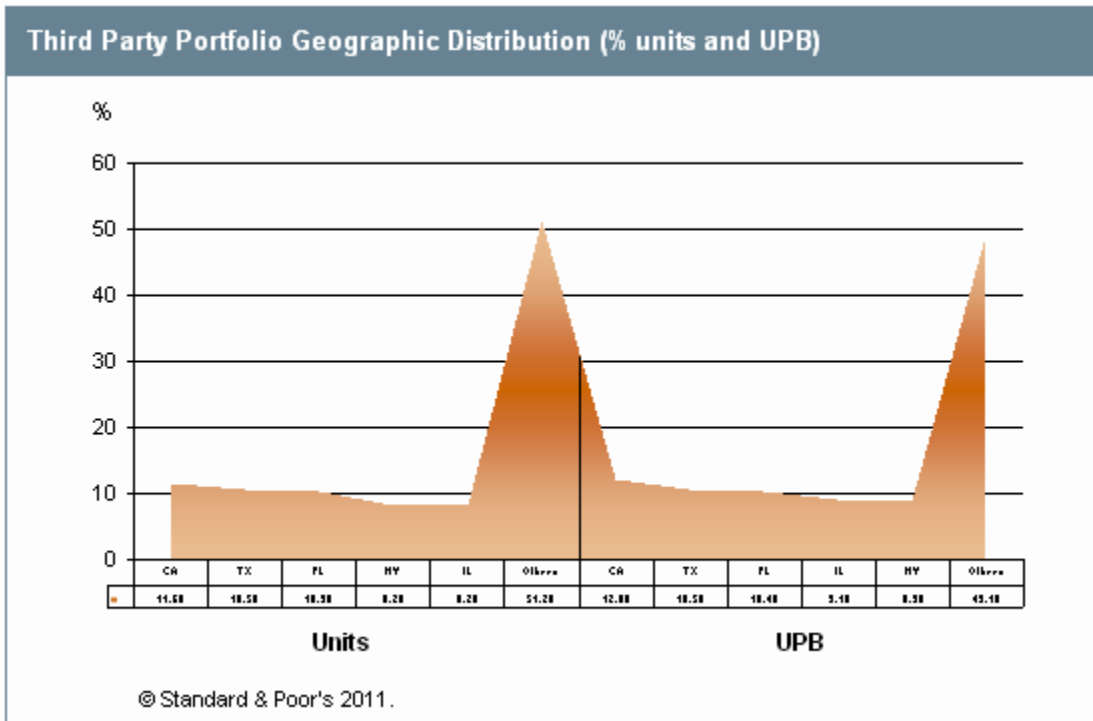


Chart 4



New loan boarding and title filing

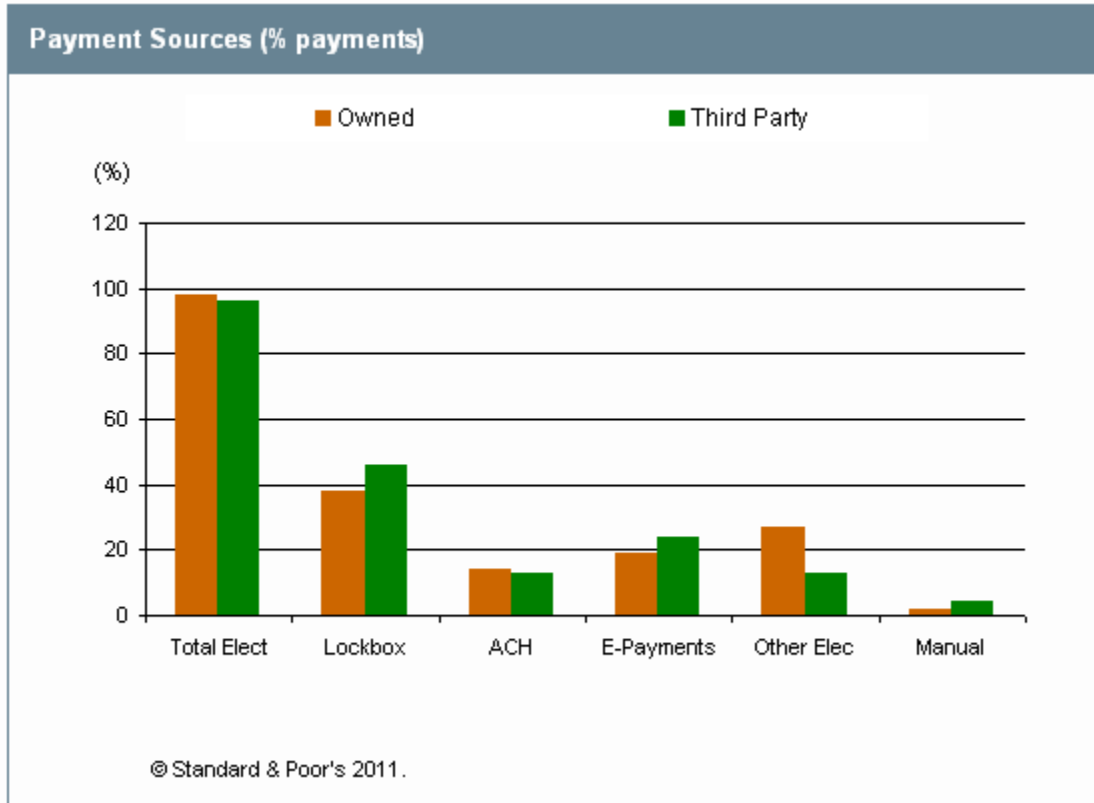
According to data provided by WO/CO, new loans are electronically boarded, and there is 100% documentation-to-system validation. Electronic data transfer expedites the boarding process and helps reduce errors associated with manual input. Electronic title filing is performed in states accepting electronic feeds.

Cash management and investor accounting

We believe WO/CO has an effective cash management operation exhibiting good internal controls to minimize risk of loss from human error or fraud. Customized monthly billing statements are produced and mailed to customers and, at the request of a third-party client, WO/CO will provide customized payment coupon books. Other reported attributes within payment services include the following:

- Check images are viewable via the lockbox vendor's Intranet Web site and "Check 21" is initialized, accelerating payment clearing;
- Electronic payment performance is approximately 97%, which we consider very good, representing both owned and third-party portfolios;
- Payment process is secured and unidentified payment-checks do not leave the processing area;
- Postdated payment-checks are forwarded to the accounting department, which returns them to the customers if postdated more than one day.
- Desk inspections to ensure exception payments are processed in a timely manner;
- Nightly sweep of funds from the payment-clearing account to custodial accounts; and
- The payment-clearing account is balanced daily.

Chart 5



We believe WO/CO has controls in place intended to protect investors from risk of loss, resulting from fraud or human error. WO/CO performs investor reporting, remitting, and account reconciling functions for owned and third-party portfolios. The ABS reporting department reviews and distributes investor reporting. In our view, there is good oversight over the entire reporting, remitting, and reconciliation functions with highlighted controls represented as follows:

- Segregation of duties between personnel handling, remitting, reporting, and reconciliation functions;
- Funds are wired daily from the payment-clearing accounts to the appropriate custodial accounts;
- Dual level authorization required for wire and ACH transfers;
- Data gathering is fully automated with no manual data manipulation, to maximize the integrity of information reported to investors;
- Management represents that it reviews all reports, reconciliations, and remittances to ensure accuracy of the data;
- 100% electronic reporting and remittance aimed at providing timely, accurate, and responsive delivery to investors;
- Securitization data is available through Web portal access for investors; and
- There were three aged items between WO/CO and third-party clients that were greater than 60 days old at June 30, 2010, representing a net credit of less than \$2,300. There were no aged items open for more than 90 days.

Customer relations

In our opinion, WO/CO performs customer service duties in a well-automated environment with a generally well-trained staff. An ACD and VRU are used to route call traffic and offer a menu of automated information options. In addition, a call volume work management model is used, and loan document images are accessible on representatives' desktops. The customer service call center is primarily based in Earth City; however, as previously mentioned this year, the servicer established a call center in Deerfield Beach. The Deerfield Beach location expands WO/CO's opportunity to increase its Spanish-speaking representatives. We believe WO/CO provides sound customer service as evidenced by the following:

- Hours of operations, including bilingual staff, are central time Monday through Friday from 7 a.m. to 7 p.m. and on Saturday from 8 a.m. to noon;
- The company's VRU is bilingual (Spanish) and available 24/7;
- The blended VRU capture rate is approximately 27%, which is down from 30% reported in our last review. However, Web usage has increased to 49% from 43% as of last review;
- The Web site is available for World Omni customers to retrieve specific information, make payments, and correspond with customer service;
- At June 30, the six-month average of the average speed of answer (ASA) was 53 seconds, and the abandonment rate was 4.31%, which we deem to be acceptable;
- The minimum monthly call monitoring for each representative is three; however, we believe a minimum of 10 calls per month is a prudent servicing practice;
- There is a standardized call monitoring scorecard that includes comparable consistent metrics and measuring tools, which the servicer uses for monitoring, training, and coaching purposes;
- Call recording technology is in place but not all calls are recorded;
- A dedicated customer service correspondence unit is part of the servicer's customer servicer; and
- The company tracks and monitors all customer correspondence to ensure that responses are timely and adhere to regulatory compliance guidelines.

Default management

WO/CO has represented that it uses a bifurcated approach to its collection administration activities. To assist in its collection efforts, WO/CO employs both an offshore and near-shore servicers to perform early-stage collection/reminder calls to low-risk borrowers. WO/CO uses its domestic collection staff for its third-party clients unless the servicing contract permits nondomestic collections. Also, the company assigns accounts according to delinquency days past due (DPD) for its own portfolio, as well as its third-party portfolio. Turnover with the offshore service provider remains extremely high, which we view as a weakness. WO/CO reports that it continues to examine its vendors (offshore and near-shore) service levels adherence and has recently added "champion/challenger" monitoring and testing to its evaluation processes.

We believe, WO/CO use of technology, educated collection staff, and payment behavior models are key factors to its collection performance.

Table 2

Default Management		
	Domestic	Off-shore
Full-time	225	34
Part-time	12	8
Temp-to-perm	0	0
Average collector experience	9 years	2 years
Collector turnover (% annualized)	21.00	86.00
Average manager experience	22 years	
Average manager tenure	14 years	
Average supervisor experience	15 years	
Average supervisor tenure	11 years	

WO/CO uses its proprietary behavior-scoring model to form its call distribution allocation of low- and higher-risk customers. Domestically, collection representatives are split between Earth City, Mobile, and its new Deerfield Beach location. These mirrored facilities provide a virtual servicing set-up and a well-situated backup if the company needs to begin executing its disaster plan.

WO/CO reported that new collection representatives receive up to 36 weeks of education and training that is split between classroom instruction and supervised OTJ training. According to the company, collector education includes FDCPA, systems, compliance, and other regulatory acts. The company tests new employees weekly to ensure comprehension of education and training. In addition to the training, the company provides education on listening and negotiation skills, loss mitigation recognition, and ongoing training surrounding new client guidelines.

WO/CO reported that it divides the domestic collection department into three groups: (1) early stage collections—one to 50 DPD based upon strategy and risk groups, which primarily employs autodialer technology along with payment behavior modeling to coordinate calling campaigns and to manage productivity of delinquent accounts; (2) 51 and greater DPD, and (3) high-risks solutions focusing on alternatives to reduce losses on highest risk accounts based on the company's proprietary risk modeling application. The former group's initial collection contact, which will begin by the fifth DPD or according to client guidelines, is based on customers' previous payment patterns, and other factors such as state-specific requirements. The servicer uses customized behavior scoring to expedite account resolution by providing instruction, such as the best time to call, allocating the customer to a collector with an

identified skill set to assist in resolution, and employing appropriate technology and tools to effectively manage resolution. We believe WO/CO's collection efforts are well-managed, based on the following attributes provided by the company:

- The central time collection hours are time-zone sensitive Monday through Thursday 7 a.m. to 10 p.m.; Friday 7 a.m. to 5 p.m.; Saturday 7 a.m. to 12 p.m.; and Sunday 3 p.m. to 7 p.m.;
- The company has a blended call center environment for efficient handling of inbound and outbound call volume;
- Collection call center ASA and abandonment statistics are less than six seconds and 2.5%, respectively. We consider these statistics excellent;
- The servicer uses autodialer technology, which combined with automated messaging that uses right-party verification, allows borrowers to transfer to an agent or self-serve through the VRU or payment vendor;
- A monthly minimum of four calls per representative is conducted; however, we believe a minimum of 10 calls per month per agent is a prudent servicing practice;
- Bilingual and multilingual collection representatives are available;
- Promise-to-pay success rate averages 73%; and
- If communication with the borrower has been unsuccessful, contractors may be used to initiate contact.

Chart 6

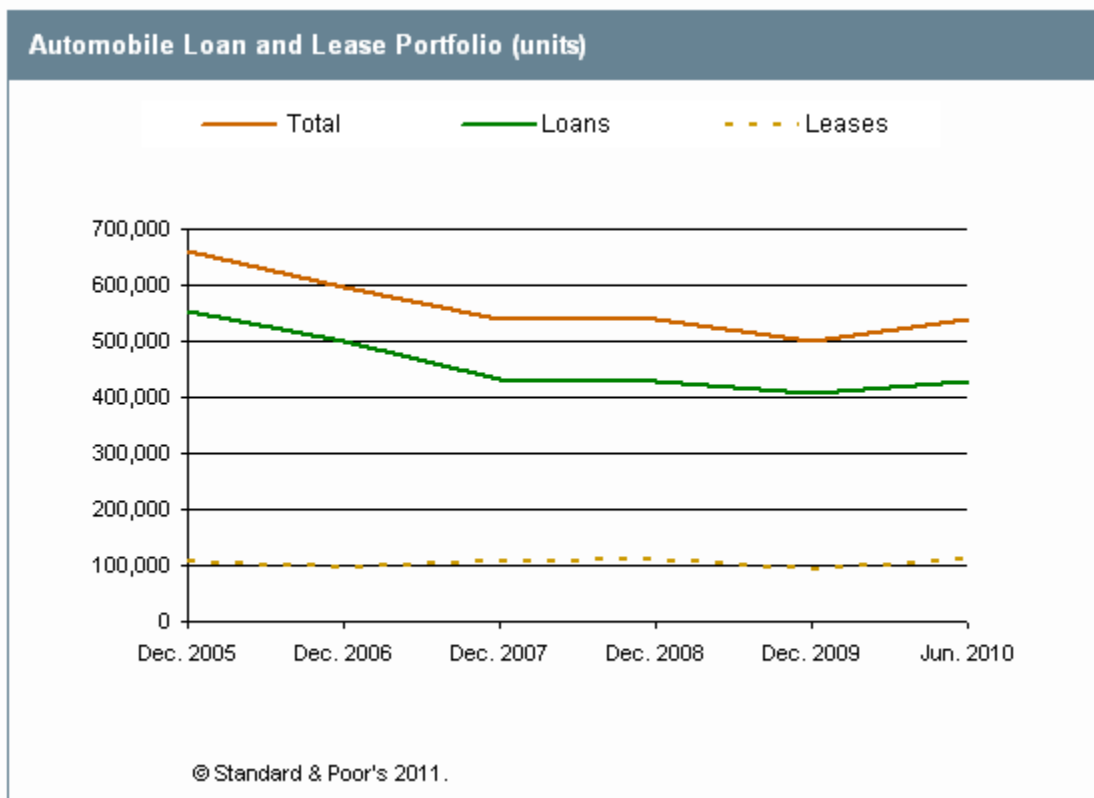


Table 3

Automobile Loans Statistics						
	Jun. 2010	Dec. 2009	Dec. 2008	Dec. 2007	Dec. 2006	Dec. 2005
Units (#)	412,603	407,625	427,452	431,165	500,956	554,371

Table 3

Automobile Loans Statistics (cont.)						
Volume (\$ million)	5,793	5,613	6,093	6,022	7,051	7,376
Total delinquency (% of loans)	2.11	2.73	3.01	2.44	2.34	2.39
30 days (%)	1.71	2.09	2.20	1.81	1.77	1.87
60 days (%)	0.34	0.54	0.61	0.47	0.42	0.40
90 + days (%)	0.06	0.10	0.20	0.16	0.15	0.12
Bankruptcy (%)	1.83	1.78	1.39	1.52	2.15	2.14
Charge-off (%)	0.24	0.34	0.35	0.26	0.30	0.47
Repossessions (#)	774	1,018	1,275	991	1,115	1,945

Chart 7

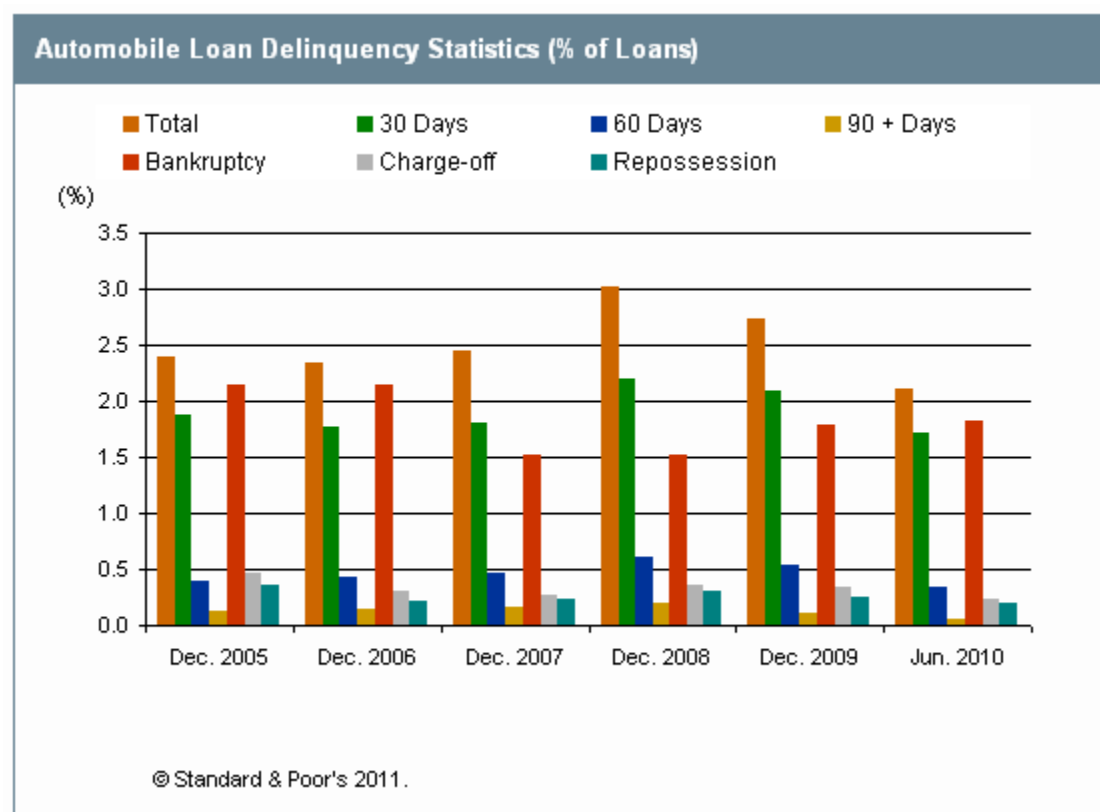


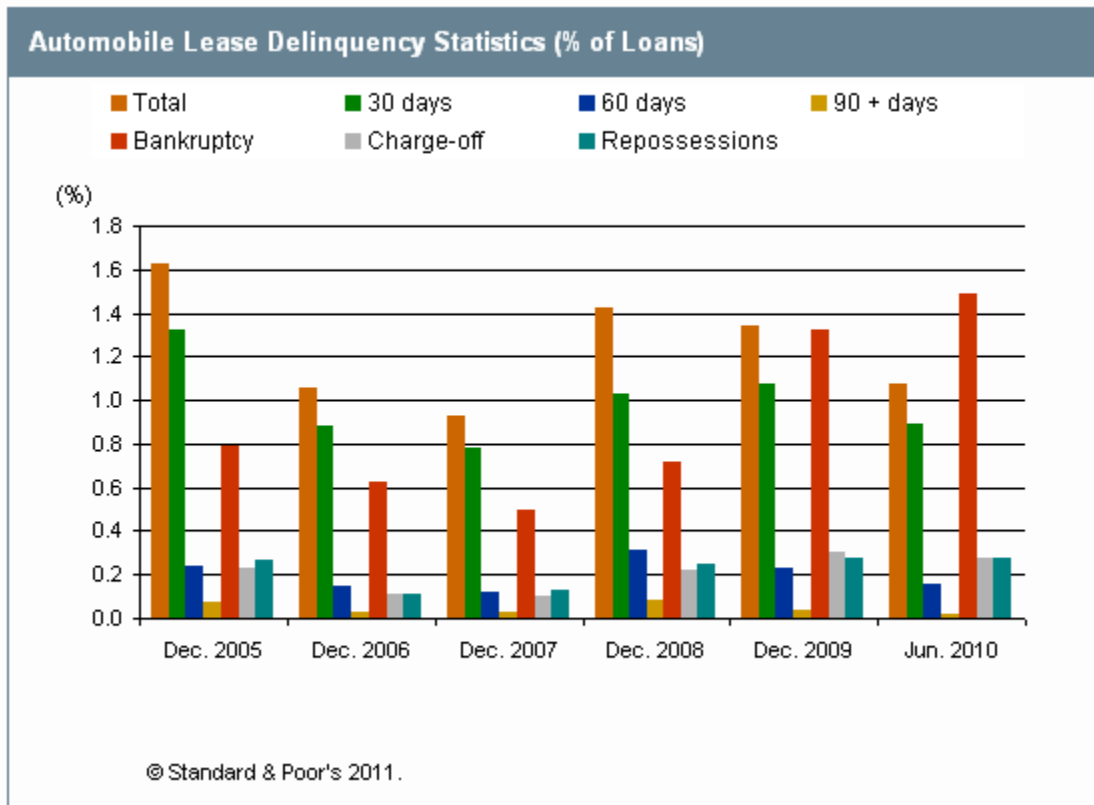
Table 4

Automobile Lease Statistics						
	Jun. 2010	Dec. 2009	Dec. 2008	Dec. 2007	Dec. 2006	Dec. 2005
Units (#)	90,210	93,133	110,339	107,701	95,800	107,904
Volume (\$ million)	1,715	1,752	2,177	2,187	1,818	1,947
Total delinquency (% of loans)	1.07	1.34	1.42	0.93	1.06	1.63
30 days (%)	0.89	1.07	1.03	0.78	0.88	1.32
60 days (%)	0.16	0.23	0.31	0.12	0.15	0.24
90 + days (%)	0.02	0.04	0.08	0.03	0.03	0.07
Bankruptcy (%)	1.49	1.32	0.72	0.50	0.62	0.79

Table 4

Automobile Lease Statistics (cont.)						
Charge-off (%)	0.28	0.30	0.22	0.10	0.11	0.23
Repossessions (#)	251	256	276	141	106	283

Chart 8



Insurance, bankruptcy, repossession, and recovery

WO/CO indicates that it requires insurance coverage for lease accounts in its efforts to ensure that the coverage meets the criteria for a product and is within state requirements. Leases are monitored and tracked by a third-party vendor who specializes in this service. If the required coverage is not in place at a specific predetermined interval, the account is routed back to WO/CO by the vendor. WO/CO says it will then take immediate action to attain satisfactory resolution.

WO/CO's has stated its strategy is to proactively manage its bankruptcy caseload through in-house and third-party vendors to maximize timeline performance and minimize risk of loss. The following are some processes and controls as reported by WO/CO:

- PACER is used to electronically access court filings and monitor their status;
- Verified bankruptcy accounts are flagged;
- Reaffirmations are obtained when possible;
- When applicable, proof of claim is prepared and lift of stay is filed; and
- Assignment of accounts to approved attorneys and appropriate follow-ups.

According to company policies, WO/CO's repossession commences after other collection remedies have been exhausted. These remedies include extensions, due-date changes, transfers of equity, and assignments of lease, refinances, or approved seller sales. When authorization to repossess is obtained, an approved independent repossession contractor is contacted to take action. WO/CO executes the necessary internal and external notices. Repossession agents use an automated license plate recognition application along with cameras and laptops to scan license plates to identify a delinquent borrower's vehicle. Vehicle tracking controls reside in the vehicle prospector and the VRMS. These systems track the vehicle through its sale at the automobile auction until sales proceeds are applied. If there is a deficiency balance on a repossessed vehicle, the account is transferred to WO/CO's recovery department for processing. According to management, it is testing on a limited control scale skip tracing capabilities using GPS technology that may assist in vehicle location.

A dedicated charge-off and recovery staff is responsible for determining the course of action necessary to maximize recovery. The staff consists of 18 employees who have an average of 16 years of industry experience. Management averages 30 years of industry experience. WO/CO's recovery methodology is intended to maximize recovery, employing various settlement guidelines. Employees may accept payment within settlement matrixes. Settlement requests outside of the guidelines require managerial authorization.

In our opinion, WO/CO's historical performance and our recent review have confirmed our opinion that it has efficient and effective procedures, solid technology, and effective processes in place to manage its default operations. The company, we believe, maintains efficient oversight of its vendor relationships especially with independent repossession contractors and important support areas to optimize workflow efficiency and report monitoring to maximize recoveries.

Asset disposition

Upon vehicle repossession or a closed lease contract, the asset management/repossession tracking department manages asset disposition. The department is divided between four groups and consists of 60 full-time and two part-time employees. Some employees are bilingual and multilingual. The department utilizes automated call center technology aimed at effective and efficient sales and lease marketing efforts. The company maintains key performance matrixes, which are intended to enable management to immediately focus on aberrations and anomalies outside the established control parameters. Some attributes reported include:

- Silent call monitoring and recording are in place; however, monthly agent call monitoring is reported at five. We believe a minimum of 10 calls per agent per month is a prudent servicing practice;
- Extended evening and weekend hours for calling campaigns;
- Sales conversion and residual loss analysis;
- National auctions are used to marshal and sell recovered vehicles; and
- Credit bureau reporting on delinquent borrowers are at 30 DPD and at each subsequent 30 DPD.

Overall, we believe, WO/CO takes an assertive approach to proactively mitigate financial losses through its call center management, sound sales and remarketing methodology, and firm vendor management.

Financial Position

We deem WO/CO's financial position to be Sufficient. According to our criteria, the financial position ultimately reflects that of WO/CO's parent, JM Family Enterprises Inc.

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