

Date: January 14, 2014

To: Certified Development Companies

From: Frank Keane, DCF LLC Fiscal Agent

Subject: January 2014 SBA 504 Debenture Offering

On January 15, 2014, 444 twenty-year debentures totaling \$283,660,000 and 41 ten-year debentures totaling \$16,313,000 will be funded through the settlement of certificates guaranteed by SBA. Below are the January 9 debenture pricing details:

Sale/Sale Comparison	Treasury	Swap Spread	Spread	Rate	T plus
2014-20A (1/09/14)	2.98%	+.09bps	.39bps	3.46%	.48bps
2013-20L (12/6/13)	2.86%	+.07bps	.45bps	3.38%	.52bps
Change	+.12bps	+.02bps	06bps	+.08bps	04bps

Sale/Sale Comparison	Treasury	Swap Spread	Spread	Rate	T plus
2014-10A (1/09/14)	1.76%	+.08bps	+.30bps	2.14%	.38bps
2013-10F (11/5/13)	1.44%	+.12bps	+.32bps	1.88%	.44bps
Change	+.32bps	04bps	02bps	+.26bps	06bps

- The **February** offering will consist of 20-year debentures.
- The Cutoff date to submit loans to the CSA for this offering is Thursday, January 23.
- A *request to remove a submitted loan* from a financing must be made through the CSA by close of business **Monday, February 3**. In advance of that all CDCs are required to determine "no adverse change" for each loan before submitting it to SBA.
- *Pricing and pooling date* is Thursday, **February 6**, on which day the debenture interest rates will be set and the pool legally formed and closed. Loans may not be pulled from the financing after the debenture interest rate has been set and the pool legally formed.
- The debentures will be funded on Wednesday, February 12
- **Higher rates, improved spreads** Treasury rates had risen 108 bps since our January 2013 sale, with Interest Rate Swaps and credit spreads widening due to reduced economic stimulus from the Fed. Expectations are for a continued, gradual rise in rate during 2014 but last Friday's Non-Farm Payroll report is a reminder that is not guaranteed as job growth was disappointing and drove rates even lower than when we priced last Thursday. Markets have recovered from their mid-year spike in rates and we have been able to improve our pricing spread to Treasuries by .18 bps since the August wide of +.66 bps. Lackluster economic growth, disinflation and the lowest civilian labor force participation rate in 35 years are proving to be formidable obstacles to the Fed's Zero Interest Rate Policy and until they improve we may find ourselves stalled in this recent rate range.

¹ Per SOP 50-10(5)(E), page 341, subparagraph C.6.III.A.3.," CDCs must issue an opinion that to the best of its knowledge there has been no unremedied substantial adverse change in the Borrower's (or Operating Company's) ability to repay the 504 loan since its submission of the loan application to SBA ("finding"). For all 504 loans except ALP and PCLP, CDCs must provide its finding to the SLPC along with copies of the financial statements current within 120 days supporting that finding. The CDC's finding of no adverse change must be made no more than 14 calendar days prior to submission to the SLPC at the time the CDC is requesting that SLPC transmit the file to District Counsel for debenture closing. The SLPC either will notify the CDC of its approval or, if SBA disagrees with the CDC's determination of no adverse change, the debenture will not close until SBA has been satisfied that any adverse change has been remedied. ALP and PCLP CDCs must make a finding of no unremedied substantial adverse change 14 calendar days prior to submission of the closing package to District Counsel and retain the finding and copies of the financial statements on which they relied in' their files. If the debenture closing is not consummated in the month following the finding, all CDCs must make and submit (except PCLP and ALP CDCs which must retain the finding in the file) a new finding of No Adverse Change and request for transmission of the file including SLPC's approval of the new finding to District Counsel."