

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Temporary impairment or impairment recovery, effected through a change in the MSR valuation allowance, is captured as a component of mortgage banking net revenue in the Consolidated Statements of Income. The Bancorp maintains a non-qualifying hedging strategy to manage a portion of the risk associated with changes in value of the MSR portfolio. This strategy includes the

purchase of free-standing derivatives and various available-for-sale securities. The interest income, mark-to-market adjustments and gain or loss from sale activities associated with these portfolios are expected to economically hedge a portion of the change in value of the MSR portfolio caused by fluctuating discount rates, earnings rates and prepayment speeds.

The fair value of the servicing asset is based on the present value of expected future cash flows. The following table displays the beginning and ending fair value for the years ended December 31:

(\$ in millions)	2010	2009
Fixed rate residential mortgage loans:		
Fair value at beginning of period	\$667	458
Fair value at end of period	791	667
Adjustable rate residential mortgage loans:		
Fair value at beginning of period	32	38
Fair value at end of period	31	32

The following table presents activity related to valuations of the MSR portfolio and the impact of the non-qualifying hedging strategy, which is included in the Consolidated Statements of Income for the years ended December 31:

(\$ in millions)	2010	2009	2008
Securities gains, net – non-qualifying hedges on MSRs	\$14	57	120
Changes in fair value and settlement of free-standing derivatives purchased to economically hedge the MSR portfolio (Mortgage banking net revenue)	109	41	89
Provision for MSR impairment (Mortgage banking net revenue)	(36)	(24)	(207)

As of December 31, 2010 and 2009, the key economic assumptions used in measuring the interests that continued to be held by the Bancorp at the date of sale or securitization resulting from

transactions completed during the years ended December 31, 2010 and 2009 were as follows:

		December 31, 2010				December 31, 2009			
	Rate	Weighted-Average Life (in years)	Prepayment Speed (annual)	Discount Rate (annual)	Weighted-Average Default Rate	Weighted-Average Life (in years)	Prepayment Speed (annual)	Discount Rate (annual)	Weighted-Average Default Rate
Residential mortgage loans:									
Servicing assets	Fixed	6.7	10.7%	10.3%	N/A	6.6	12.0%	9.8%	N/A
Servicing assets	Adjustable	3.6	23.3	11.3	N/A	2.7	35.5	10.8	N/A

Based on historical credit experience, expected credit losses for residential mortgage loan servicing assets have been deemed immaterial, as the Bancorp sold the majority of the underlying loans without recourse. At December 31, 2010 and 2009, the Bancorp was servicing \$54.2 billion and \$48.6 billion, respectively,

of residential mortgage loans for other investors. The value of interests that continue to be held by the Bancorp is subject to credit, prepayment and interest rate risks on the sold financial assets. At December 31, 2010, the sensitivity of the current fair value of residual cash flows to immediate 10% and 20% adverse changes in those assumptions are as follows:

		Prepayment Speed						Weighted-Average Default			
				Assumption		Residual Servicing Cash Flows				Impact of Adverse Change on Fair Value	
		Fair Value	Weighted-Average Life (in years)	Rate	Impact of Adverse Change on Fair Value	Discount Rate	Impact of Adverse Change on Fair Value	Rate	Impact of Adverse Change on Fair Value	Rate	Impact of Adverse Change on Fair Value
(\$ in millions)	Rate				10% 20%		10% 20%		10% 20%		10% 20%
Residential mortgage loans:											
Servicing assets	Fixed	\$791	5.9	13.0%	(\$36) (70)	10.6%	(\$30) (58)	- %	\$ -	-	-
Servicing assets	Adjustable	31	3.0	26.2	(2) (3)	11.9	(1) (2)	-	-	-	-

These sensitivities are hypothetical and should be used with caution. As the figures indicate, changes in fair value based on a 10% and 20% variation in assumptions typically cannot be extrapolated because the relationship of the change in assumption to the change in fair value may not be linear. Also, in the previous table, the effect of a variation in a particular assumption on the fair value of the interests that continue to be held by the Bancorp is calculated without changing any other assumption; in reality, changes in one factor may result in changes in another (for example, increases in market interest rates may result in lower

prepayments and increased credit losses), which might magnify or counteract the sensitivities.

Automobile Loan Securitizations

During 2008, the Bancorp sold \$2.7 billion of automobile loans in three separate transactions, recognizing gains of \$15 million, offset by \$26 million in losses on related hedges. Each transaction isolated the related loans through the use of a securitization trust or a conduit, formed as QSPEs, to facilitate the securitization process. The QSPEs issued asset-backed securities with varying levels of