

COMM 2019-GC44 Mortgage Trust Rating Report (Non-NRSRO Rating)

Tranche Name	EJR Rating*
A1	AA(sf)
A2	AA(sf)
A3	AA(sf)
ASB	AA(sf)
A4	AA(sf)
A5	AA(sf)
AM	A+(sf)
B	A-(sf)
C	BBB(sf)
D	B+(sf)
E	CCC(sf)
F	D(sf)
XA	A+(sf)
XB	BBB(sf)
XD	CCC+(sf)
XF	D(sf)
GRR	NR(sf)
HRR	NR(sf)
RRC	NR(sf)
RRI	NR(sf)
S	NR(sf)
R	NR(sf)

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Prepared on Apr 12, 2022
 *Non-NRSRO Rating

Rating Summary

TRANCHES	BALANCE (\$M)	OTHER NRSROs*	EJR RATING (NON-NRSRO)**	CE	LOAN-TO-VALUE (LTV) %		
					BASE	OPTIMISTIC	PESSIMISTIC
A1	15.17	AAA	AA(sf)	30.25	51.17	43.28	61.03
A2	138.84	AAA	AA(sf)	30.25	51.17	43.28	61.03
A3	55.47	AAA	AA(sf)	30.25	51.17	43.28	61.03
ASB	29.56	AAA	AA(sf)	30.25	51.17	43.28	61.03
A4	176.00	AAA	AA(sf)	30.25	51.17	43.28	61.03
A5	267.20	AAA	AA(sf)	30.25	51.17	43.28	61.03
AM	118.36	AA-	A+(sf)	18.15	60.05	50.79	71.62
B	40.69	AA-	A-(sf)	13.99	63.10	53.37	75.26
C	35.75	A-	BBB(sf)	10.34	65.78	55.63	78.46
D	23.43	BBB	B+(sf)	7.94	67.54	57.12	80.56
E	18.49	BBB-	CCC(sf)	6.05	68.92	58.30	82.21
F	18.49	BB-	D(sf)	4.16	70.31	59.47	83.86
XA	800.59	AAA	A+(sf)	0.00			
XB	76.44	AA-	BBB(sf)	0.00			
XD	41.92	BBB-	CCC+(sf)	0.00			
XF	18.49	BB-	D(sf)	0.00			
GRR	9.86	B-	NR(sf)	3.15			
HRR	30.82		NR(sf)	0.00			
RRC	25.59		NR(sf)	0.00			
RRI	12.10		NR(sf)	0.00			
S	0.00		NR(sf)	0.00			
R	0.00		NR(sf)	0.00			

* Rating of other NRSROs translated to EJR's rating scale; we use the median rating, and for only two ratings, the lower rating.

** EJR rates the items as a Non-NRSRO. Ratings are based on Base case assumptions.

Transaction Summary

The transaction closed on Dec 12 2019 and matures in Sep 2033. The pool's current aggregate principal balance is \$1143.3 million compared to \$1152.3 million at close.

The largest loan of the pool (6.6%) is secured by Century Plaza Towers - Pooled located in Los Angeles-Long Beach-Glendale, CA metropolitan area. Occupancy at the subject was 91%. The major tenants included Bank of America (6.23%) and Manatt Phelps (4.85%). The second largest loan of the pool (5.5%) is secured by 180 Water - Pooled located in New York-Jersey City-White Plains, NY-NJ metropolitan area. Occupancy at the subject was 63%. The major tenants included Citibank (25.38%) and 180 Water Donuts LLC (5.45%). The third largest loan of the pool (11.2%) is secured by 180 Water - Non-Pooled located in New York-Jersey City-White Plains, NY-NJ metropolitan area. Occupancy at the subject was 63%. The major tenants included Citibank (25.38%) and 180 Water Donuts LLC (5.45%).

Quantitative Analysis

Key Credit Metrics

CLOSING DATE	Dec 12 2019
WAC / NWAC	3.5281 / 3.5115
WAM / WALA	75 / 28
# Loans / Properties	44 / 67
Wtd Avg Orig / Appraisal LTV	57.09 / 56.99
Wtd Avg UW / Curr NOI Debt Yield	9.95% / 8.28%
Wtd Avg UW / Curr NCF DSCR	2.48 / 2.13
% Occupancy	88.42
% RemTerm <= 6mos	0.00

The weighted average coupon (WAC) and the weighted average age (WALA) were 3.53% and 28 months as of 03/15/2022, respectively. There are a total of 44 loans and 67 properties in the portfolio. The appraisal LTV was approximately 57.0% compared to the Original loan to value (LTV), which was approximately 57.1%. The most recent weighted average Debt Service Coverage Ratio (DSCR) was 2.13x. As of 03/15/2022, no loan had a remaining term of less than 6 months. Weighted average occupancy was approximately 88%.

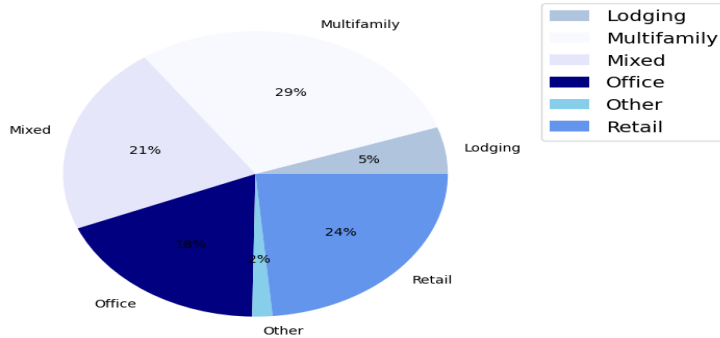
(Data Source: INTExcalc)

Portfolio Characteristics

Property Type

Property Type	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
Lodging	4.00	60.76	5.31	4.03	62.40	91.71	28.29	1.70
Multifamily	26.00	337.04	29.48	3.57	55.55	58.18	28.00	1.71
Mixed	21.00	245.15	21.44	3.37	60.21	86.11	28.92	2.60
Office	5.00	211.39	18.49	3.33	43.42	77.16	28.64	3.13
Other	1.00	19.37	1.69	4.38	82.35	89.00	31.00	1.08
Retail	10.00	269.59	23.58	3.60	61.78	81.22	28.00	2.10

Type Concentration



Among assets in the portfolio, Lodging properties accounted for 5% of total balance, Multifamily properties accounted for 29% of total balance, Mixed properties accounted for 21% of total balance, Office properties accounted for 18% of total balance, Other properties accounted for 2% of total balance and Retail properties accounted for 24% of total balance.

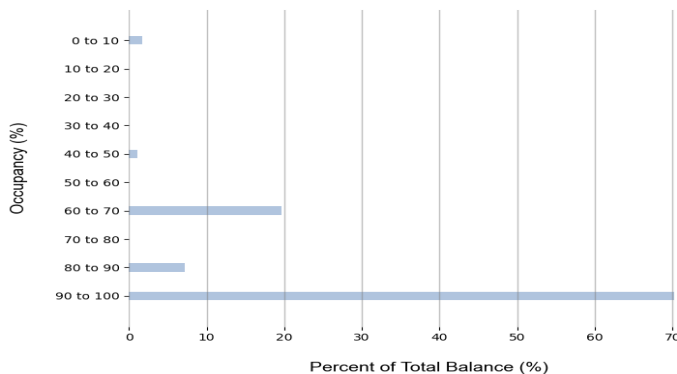
Defeasance Status

Defeasance Status	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
Defeasance Not Allowable	5	163.82	14.33	3.50	61.11	91.18	29.10	2.65
No Defeasance Occurred	39	979.49	85.67	3.53	55.84	72.78	28.26	2.18

Occupancy % (by property)

Occupancy (%)	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
0 to 10	1.00	19.37	1.69	4.38	82.35	89.00	31.00	1.08
10 to 20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
20 to 30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 to 40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
40 to 50	1.00	13.03	1.14	3.95	59.21	92.00	28.00	0.16
50 to 60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
60 to 70	4.00	225.27	19.70	3.51	51.67	41.32	28.08	1.66
70 to 80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
80 to 90	5.00	82.92	7.25	4.00	65.23	90.21	29.79	1.87
90 to 100	56.00	802.72	70.21	3.46	56.42	82.86	28.26	2.51

Occupancy Distribution (%)

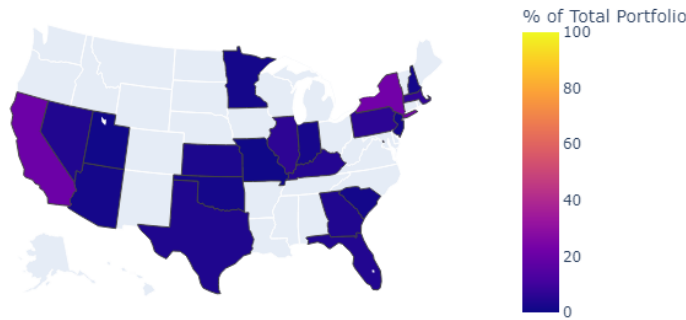


Occupancy of the portfolio ranged from 0% to 100%. More specifically, 1 assets (2% of total balance) had the occupancy rate between 0% and 10%, 1 assets (1% of total balance) with the occupancy rate between 40% and 50%, 4 assets (20% of total balance) with the occupancy rate between 60% and 70%, 5 assets (7% of total balance) with the occupancy rate between 80% and 90% and 56 assets (70% of total balance) with the occupancy rate higher than 90%.

Region (by property)

Region	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
Midwest / Central East	7.00	94.44	8.26	3.61	64.52	91.52	28.48	1.99
Midwest / Central West	3.00	57.62	5.04	3.89	57.61	57.08	28.00	1.56
Northeast / MidAtlantic	14.00	341.13	29.84	3.42	53.61	54.71	28.17	1.81
Northeast / New England	15.00	100.08	8.75	3.77	65.88	92.00	28.00	2.32
South / Atlantic	7.00	135.25	11.83	3.46	59.39	84.62	28.94	2.63
South / Central East	3.00	52.25	4.57	3.35	59.52	92.00	28.00	3.33
South / Central West	4.00	56.45	4.94	4.03	66.17	88.72	31.66	1.93
West / Mountain	4.00	69.93	6.12	3.72	62.96	92.00	28.00	2.08
West / Pacific North	3.00	99.07	8.66	3.45	46.26	61.72	28.00	2.93
West / Pacific South	7.00	137.11	11.99	3.29	47.77	92.00	28.00	2.65

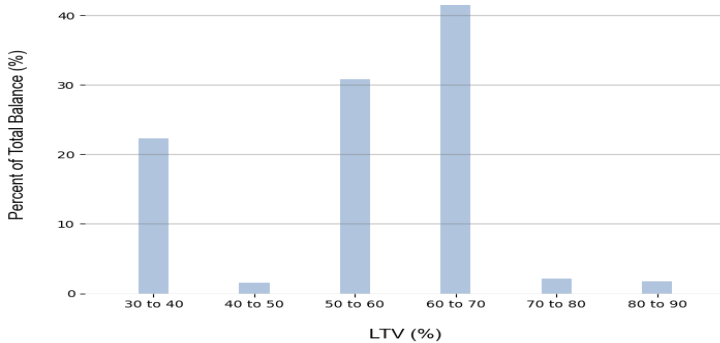
Local Distribution



Among assets in the portfolio, there are 10 properties (22% of total balance) located in New York, 10 properties (21% of total balance) in California, 3 properties (7% of total balance) in Massachusetts, 5 properties (6% of total balance) in Illinois, 3 properties (6% of total balance) in Pennsylvania and 3 properties (5% of total balance) in Kentucky. Other properties are located in the state of Georgia, Texas, Kansas, Washington DC, Indiana, Minnesota, Arizona, Oklahoma, New Jersey, New Hampshire, South Carolina, Utah and Missouri.

Loan to Value (LTV)

LTV Distribution (%)



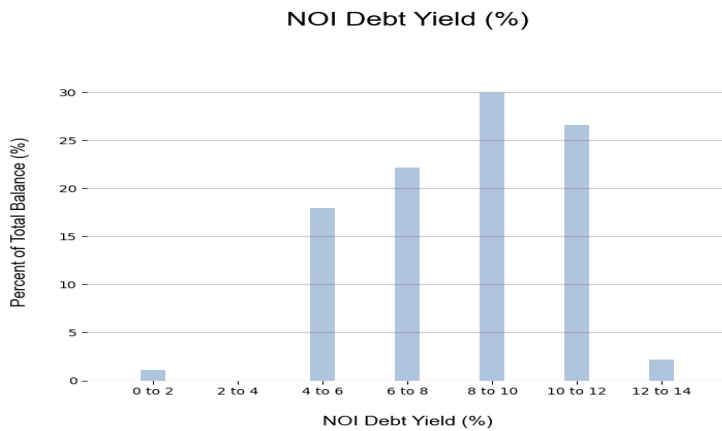
Among all the assets in the portfolio, 5 assets (22% of total balance) had LTVs between 30% and 40%, 1 assets (2% of total balance) with LTVs between 40% and 50%, 10 assets (31% of total balance) with LTVs between 50% and 60%, 26 assets (42% of total balance) with LTVs between 60% and 70%, 1 assets (2% of total balance) with LTVs between 70% and 80% and 1 assets (2% of total balance) with LTVs between 80% and 90%.

Amortization

Is Balloon	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
Balloon	44	1143.31	100.00	3.53	56.59	75.41	28.38	2.24

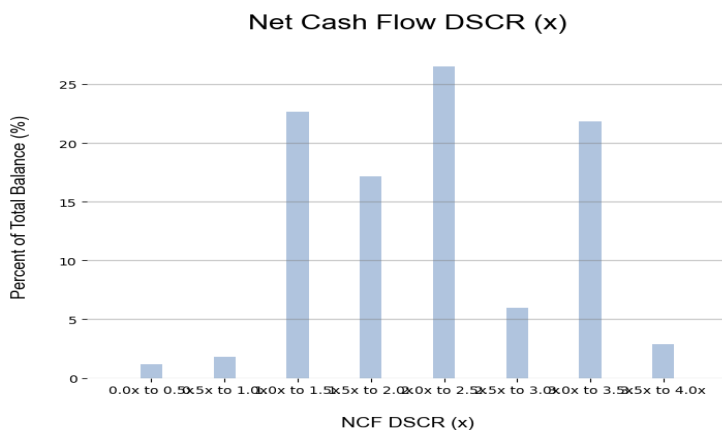
NOI Debt Yield

NOI Debt Yield (%)	Assets	Balance (\$M)	Bal %	Gross Coupon %	Curr Amort LTV %	Remaining Term (mos.)	Age (mos.)	DSCR (x)
0 to 2	1.00	13.03	1.14	3.95	59.21	92.00	28.00	0.16
2 to 4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 to 6	5.00	205.30	17.96	3.39	56.27	48.36	28.22	1.33
6 to 8	15.00	253.04	22.13	3.71	55.53	68.93	28.30	1.82
8 to 10	12.00	342.75	29.98	3.55	63.69	89.00	28.53	2.28
10 to 12	9.00	304.17	26.60	3.42	49.52	81.69	28.45	3.17
12 to 14	2.00	25.03	2.19	3.62	57.37	92.00	28.00	3.44



Most recent net operating income debt yield ranged from 0% to 13% with a weighted average NOI debt yield of 8.3%. NOI debt yield ranged from 0% to 13%. There were 1 assets (1% of total balance) with NOI debt yield between 0% and 2%, 5 assets (18% of total balance) with NOI debt yield between 4% and 6%, 15 assets (22% of total balance) with NOI debt yield between 6% and 8%, 12 assets (30% of total balance) with NOI debt yield between 8% and 10%, 9 assets (27% of total balance) with NOI debt yield between 10% and 12%, 2 assets (2% of total balance) with NOI debt yield between 12% and 14%

NCF DSCR

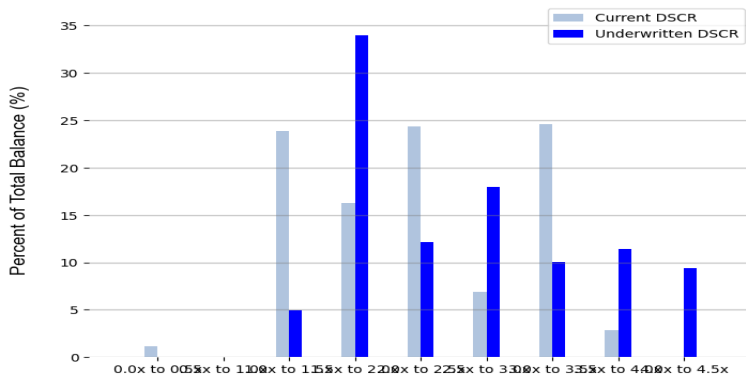


NCF DSCR ranged from 0.0x to 4.0x. There were 1 assets (1.1% of total balance) with NCF DSCR between 0.0x and 0.5x, 1 assets (1.8% of total balance) with NCF DSCR between 0.5x and 1.0x, 7 assets (22.7% of total balance) with NCF DSCR between 1.0x and 1.5x, 14 assets (17.2% of total balance) with NCF DSCR between 1.5x and 2.0x, 11 assets (26.5% of total balance) with NCF DSCR between 2.0x and 2.5x, 2 assets (6.0% of total balance) with NCF DSCR between 2.5x and 3.0x, 7 assets (21.8% of total balance) with NCF DSCR between 3.0x and 3.5x and 1 assets (2.8% of total balance) with NCF DSCR between 3.5x and 4.0x. The most recent weighted average NCF DSCR was 2.1x.

DSCR (Current / Underwritten)

Current DSCR				Underwritten DSCR			
DSCR (x)	Assets	Balance (\$M)	Bal %	DSCR (x)	Assets	Balance (\$M)	Bal %
0.0x to 0.5x	1.00	13.03	1.14	0.0x to 0.5x	0.00	0.00	0.00
0.5x to 1.0x	0.00	0.00	0.00	0.5x to 1.0x	0.00	0.00	0.00
1.0x to 1.5x	7.00	272.59	23.84	1.0x to 1.5x	2.00	57.03	4.99
1.5x to 2.0x	14.00	186.05	16.27	1.5x to 2.0x	17.00	388.24	33.96
2.0x to 2.5x	10.00	278.74	24.38	2.0x to 2.5x	8.00	139.30	12.18
2.5x to 3.0x	3.00	78.85	6.90	2.5x to 3.0x	9.00	205.44	17.97
3.0x to 3.5x	8.00	281.54	24.62	3.0x to 3.5x	2.00	114.75	10.04
3.5x to 4.0x	1.00	32.52	2.84	3.5x to 4.0x	4.00	131.02	11.46
4.0x to 4.5x	0.00	0.00	0.00	4.0x to 4.5x	2.00	107.53	9.40

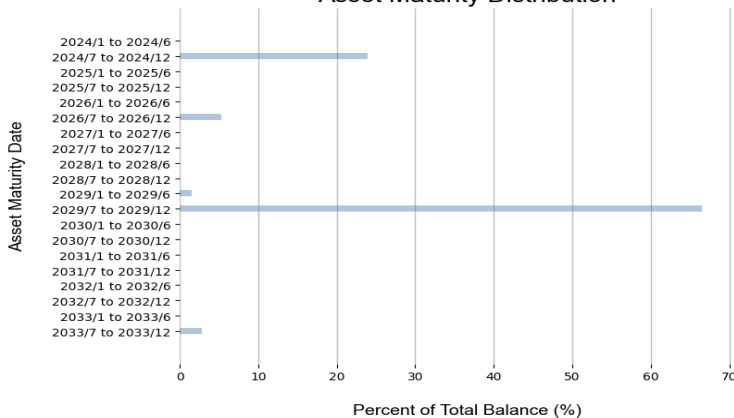
DSCR Distribution (x)



DSCRs ranged from 0.0x to 4.0x. There are 1 assets (1.1% of total balance) with DSCR between 0.0x and 0.5x, 7 assets (23.8% of total balance) with DSCR between 1.0x and 1.5x, 14 assets (16.3% of total balance) with DSCR between 1.5x and 2.0x, 10 assets (24.4% of total balance) with DSCR between 2.0x and 2.5x, 3 assets (6.9% of total balance) with DSCR between 2.5x and 3.0x, 8 assets (24.6% of total balance) with DSCR between 3.0x and 3.5x and 1 assets (2.8% of total balance) with DSCR between 3.5x and 4.0x. The most recent weighted average DSCR is 2.2x.

Maturity

Asset Maturity Distribution



There are 4 assets (273.5% of total balance) that have maturity dates between 2024/7 and 2024/12, 2 assets (59.9% of total balance) that have maturity dates between 2026/7 and 2026/12, 1 assets (17.3% of total balance) that have maturity dates between 2029/1 and 2029/6, 36 assets (760.0% of total balance) that have maturity dates between 2029/7 and 2029/12 and 1 assets (32.5% of total balance) that have maturity dates between 2033/7 and 2033/12.

Sensitivity Analysis

Summary

EJR used the capitalization rates ("cap rates") listed below for the different types of the properties and then calculated the value of the properties in the portfolio by considering the most recent NCF and the various cap rates.

Cap Rate Assumption

Type	Base Case	OPTIMISTIC CASE	PESSIMISTIC CASE
Lodging	9.38	8.62	9.75
Multifamily	5.00	4.50	5.50
Mixed	6.12	6.00	6.25
Office	5.00	4.50	5.50
Other	9.00	8.50	9.50
Retail	7.44	7.00	7.88

EJR's Key Rating Features & Differences Compared With Other NRSROs

Below is a summary of EJ's approach (see our Methodology for rating Commercial Mortgage Backed Securities (CMBS) (Non-NRSRO) for more complete description):

1. Our ratings are derived from Loan to Value estimates (LTVs) and calculated Estimated Losses (ELs). The ELs are then compared to our EL matrices to derive the implied ratings.
2. To reflect the current bearish credit conditions, we have discounted reported pool assets' Net Cashflow (NCF) by 20% for the Base Case.
3. EJ's analysis is conducted using information and cash flow engines supplied by a recognized industry service provider.
4. Subject to economic conditions, EJ may cap its highest rating at "AA" and apply an additional downgrade of up to two notches for each tranche.

SEC Rule 17g-7(a) Disclosure

Below are the disclosures as required by Paragraph (a) of Rule 17g-7.

1. The symbol in the rating scale used to denote the credit rating categories and notches within categories and the identity of the obligor, security, or money market instrument as required by Paragraph (a)(1)(ii)(A) of Rule 17g-7:

There are three notches in each of EJR's rating categories (e.g., A-(sf), A(sf) and A+(sf) for category A(sf)) except for AAA(sf), CC(sf), C(sf) and D(sf).

2. The version of the procedure or methodology used to determine the credit rating as required by Paragraph (a)(1)(ii)(B) of Rule 17g-7:

We are using the Methodology for Rating Commercial Mortgage Backed Securities (CMBS) (Non-NRSRO) v1b and General Methodology for Rating Asset Backed and Structured Finance Obligations (Non-NRSRO) v2.

3. The main assumptions and principles used in constructing the procedures and methodologies used to determine the credit rating as required by Paragraph (a)(1)(ii)(C) of Rule 17g-7:

The credit rating assigned reflects EJR's judgement regarding the future credit quality of the issue. The major assumptions used to construct the methodologies include:

- 1). Past data reflects the performance and credit worthiness of the pooled assets and is useful for analysis.
- 2). Financial and credit information that EJR gets from the issuer or the third party is reliable and accurate.
- 3). The economy and regulation policies will remain stable in the foreseeable future.

Specific quantitative assumptions used in this credit analysis applied to the collateral assets, which include Loan-to-Value analysis and Cash flow analysis.

Asset diversification is not considered in this report.

4. The potential limitations of the credit rating as required by Paragraph (a)(1)(ii)(D) of Rule 17g-7:

EJR's rating pertains solely to EJR's view of current and prospective credit quality. EJR's rating does not address pricing, liquidity or other risks associated with holding investments in the issuer. EJR ratings:

- 1). Are not intended to address the value, price, price stability, liquidity, suitability, or merit of an investment.
- 2). Do not address whether a particular rated security is suitable for a particular investor or suitable for an investor's risk tolerance.
- 3). Do not address whether the expected return of a particular investment is adequate for the inherent risk.
- 4). Do not address whether the market value of the security will remain stable over time.
- 5). Are not exact measures of the probability of default but are instead expressions of the relative credit risk of issuers and debt instruments.
- 6). Are not recommendations to buy, sell or hold any security.

5. Information on the uncertainty of the credit rating as required by Paragraph (a)(1)(ii)(E) of Rule 17g-7:

EJR's rating is dependent on numerous factors including the reliability, accuracy, and quality of the data used in determining the credit rating. The data is sourced from issuers' publicly disclosed reports, or from third-party data vendors. For solicited rating reports, EJR may also use the information provided by the client. In some cases, the information is limited because of issues such as the lack of reported data. Such shortcomings are not always readily apparent. EJR aims to identify such shortcomings and make adjustments using its best judgement.

6. Whether and to what extent third-party due diligence services have been used in taking the rating action as required by Paragraph (a)(1)(ii)(F) of Rule 17g-7:

EJR does not utilize third-party due diligence services.

7. How servicer or remittance reports were used, and with what frequency, to conduct surveillance of the credit rating as required by Paragraph (a)(1)(ii)(G) of Rule 17g-7:

EJR did not conduct surveillance of this rating.

8. A description of the data that were relied upon for the purpose of determining the credit rating as required by Paragraph (a)(1)(ii)(H) of Rule 17g-7:

EJR uses a third-party data vendor to obtain essential data for ratings on this ABS product.

9. A statement containing an overall assessment of the quality of information available and considered in the credit rating as required by Paragraph (a)(1)(ii)(I) of Rule 17g-7:

The information used in this analysis is generally of high quality.

10. Information relating to conflicts of interest as required by Paragraph (a)(1)(ii)(J) of Rule 17g-7:

This rating is unsolicited.

11. An explanation or measure of the potential volatility of the credit rating as required by Paragraph (a)(1)(ii)(K) of Rule 17g-7:

EJR's rating aims to assess the possible loss of investing in the obligations. Factors which affect such projection, and in turn EJRs rating, include changes in the credit worthiness of the collateral assets, changes in the correlation between them, and overall economic changes.

12. Information on the content of the credit rating as required by Paragraph (a)(1)(ii)(L) of Rule 17g-7:

Regarding the historical performance of the credit rating, our rating transition matrix is available in our Form NRSRO, Exhibit 1.

13. Information on the sensitivity of the credit rating to assumptions as required by Paragraph (a)(1)(ii)(M) of Rule 17g-7:

See the section in the report entitled "Rating Summary".

14. If the credit rating is assigned to an asset-backed security, a description of: (i) the representations, warranties, and enforcement mechanisms available to investors; and (ii) how they differ from the representations, warranties, and enforcement mechanisms in issuances of similar securities, as required by Paragraph (a)(1)(ii)(N) of Rule 17g-7:

Such information in this analysis is non-public. Hence EJRs has determined that this disclosure doesn't apply to this report.

Disclaimer

THIS RATING IS ISSUED IN RESPECT OF AN "ASSET-BACKED SECURITY". EGAN-JONES RATINGS COMPANY IS NOT REGISTERED AS A NATIONALLY RECOGNIZED STATISTICAL RATING ORGANIZATION IN RESPECT OF "ASSET-BACKED SECURITIES" AND THE RATING IS NOT BEING ISSUED OR MAINTAINED BY EGAN-JONES IN ITS CAPACITY AS AN NRSRO. EGAN-JONES MAKES NO REPRESENTATION OR WARRANTY THAT ANY SUCH NON-NRSRO RATING MEETS ANY CONDITIONS OR REQUIREMENTS FOR USE OF A RATING.

ATTESTATION FORM

In compliance with the US Securities and Exchange Commission (SEC) Rule 17g-7(a), the Egan-Jones analyst who published the report is responsible for the rating action and to the best knowledge of the person:

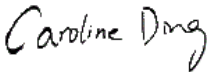
- 1) No part of the credit rating was influenced by any other business activities,
- 2) The credit rating was based solely upon the merits of the obligor, security, or money market instrument being rated, and
- 3) The credit rating was an independent evaluation of the credit risk of the obligor, security, or money market instrument.

Analyst Signature:



STEVE ZHANG
Rating Analyst
Date Prepared
2022-04-12

Reviewer Signature:



CAROLINE DING
Rating Analyst
Date Prepared
2022-04-12

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Appendix I

Smoothing Calculation

Base Case PD : assuming LTV > 100% as Default (D)	
Avg NCF * 90%	
Property Value (\$M)	1,684M
LTV	73.4%

TRANCHES	LTV %	Est. LTV implied Rtg	Cash Flow Loss %	Smoothed (Adj for Est. Loss)	Smoothed for Cashflow Est, Loss
A1	51.17	AA	0.00	AA	AA
A2	51.17	AA	0.00	AA	AA
A3	51.17	AA	0.00	AA	AA
ASB	51.17	AA	0.00	AA	AA
A4	51.17	AA	0.00	AA	AA
A5	51.17	AA	0.00	AA	AA
AM	60.05	AA	0.00	A+	A+
B	63.10	AA	0.00	A-	A-
C	65.78	AA-	0.00	BBB	BBB
D	67.54	A+	74.05	BB-	B+
E	68.92	A+	87.19	CCC+	CCC
F	70.31	A	90.07	C	D