

O. Max Gardner, III on the attached Compliance Report
December 6, 2010

All of the CWABS deals I have reviewed tonight seem to require that the trustee take possession and custody of the applicable loan files and confirm a complete and unbroken chain of transfers and assignments in proper form from the originator up the line to all parties with the last party being the Trustee. For what it's worth, Reg AB compliance reports support this as well - those filed by CW indicate they did not handle custodial responsibilities. See 2/2007 statement on compliance (covering 2006) filed [here as an example - the document custody sections are 1122\(d\)\(4\)\(i\) and \(ii\):](http://www.sec.gov/Archives/edgar/data/1365985/000090514807002715/efc7-0816_ex331.txt) http://www.sec.gov/Archives/edgar/data/1365985/000090514807002715/efc7-0816_ex331.txt. This clearly means that Linda DeMartini has established that CWHL never delivered the original loans duly indorsed the sponsor. MAJOR FINDING.

<DOCUMENT>
<TYPE>EX-33.1
<SEQUENCE>3
<FILENAME>efc7-0816_ex331.txt
<TEXT>

Exhibit 33.1

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[LOGO OMITTED] Countrywide

HOME LOANS

2900 Madera Road
Simi Valley, California 93065-

6298

(805) 955-1000

ASSESSMENT OF COMPLIANCE WITH APPLICABLE SERVICING CRITERIA

Countrywide Financial Corporation and certain of its subsidiaries, including its direct and indirect wholly-owned subsidiaries, Countrywide Home Loans, Inc. (CHL), Countrywide Tax Services Corporation, Newport Management Corporation, and Countrywide Home Loans Servicing, LP, a wholly-owned subsidiary of CHL (collectively the "Company") provides this platform-level assessment, for which Countrywide Financial Corporation and such subsidiaries participated in servicing functions, as such term is described under Title 17, Section 229.1122 of the Code of Federal Regulations ("Item 1122 of Regulation AB"), of compliance in respect of the following Applicable Servicing Criteria specified in Item 1122(d) of Regulation AB promulgated by the Securities and Exchange Commission in regard to the following servicing platform for the following period:

Platform: publicly-issued (i.e., registered with the Securities and Exchange Commission pursuant to the Securities Act of 1933, as amended) residential mortgage-backed securities (securities collateralized by residential mortgage loans, including prime, alternative loan products, sub-prime, HELOC and closed seconds) issued on or after January 1, 2006 for which the Company provides cash collection and administration, investor remittances and reporting (except for those activities relating to trustee and paying agent services), and pool asset administration (except for those activities relating to custodial operations of pool assets and related documents), collectively "Servicing Functions" and for which the related issuer has a fiscal year end of December 31, 2006.

The platform excludes any transactions issued by any government sponsored enterprise for which the Company provides Servicing Functions.

Period: as of and for the year ended December 31, 2006.

Applicable Servicing Criteria: all servicing criteria set forth in Item 1122(d), to the extent required in the related agreements, except for the following paragraphs: 1122(d)(1)(iii), 1122(d)(3)(i)(B), only as it relates to information other than that contained in the monthly remittance report delivered by the servicer to the master servicer, trustee, and/or bond administrator, 1122(d)(3)(i)(D), only as it relates to the agreeing with investors' records as to the total unpaid principal balance and number of pool assets serviced by the servicer, 1122(d)(3)(ii), only as it relates to amounts other than amounts remitted by the servicer to the master servicer, trustee, and/or bond administrator, 1122(d)(3)(iii), 1122(d)(3)(iv), 1122(d)(4)(i) and 1122(d)(4)(ii), only as 1122(d)(4)(i) and 1122(d)(4)(ii) relate to the custodial operations of the pool assets and related documents (collateral file) by the document custodian responsible for such functions for the related transaction, and 1122(d)(4)(xv), only as it relates to Item 1115 of Regulation AB (derivative transactions).

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With respect to the Platform and the Period, the Company provides the following assessment of compliance in respect of the Applicable Servicing Criteria:

1. The Company is responsible for assessing its compliance with the Applicable Servicing Criteria.
2. The Company has assessed compliance with the Applicable Servicing Criteria.
3. Other than as identified on Schedule A hereto, as of and for the Period, the Company was in material compliance with the Applicable Servicing Criteria.

KPMG LLP, an independent registered public accounting firm, has issued an attestation report with respect to the Company's foregoing assessment of compliance.

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COUNTRYWIDE FINANCIAL CORPORATION

By: /s/ Steve Bailey

Steve Bailey

Executive

Its: Senior Managing Director and Chief
Officer, Loan Administration

Dated: February 28, 2007

By: /s/ Kevin Meyers

Kevin Meyers

Its: Managing Director and Chief Financial
Officer, Countrywide Home Loans, Inc.

Loan

Administration

Dated: February 28, 2007

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Schedule A

Material Instances of Noncompliance

No material instances of noncompliance: the Company has complied, in all material respects, with the applicable servicing criteria as of and for the year ended December 31, 2006.

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