Private Sector Risk Applications Exploring Commonalities to Systemic Risk Surveillance

Dr. Michael Zerbs President and COO

May 2010



"Paulson says he was scared and clueless during Lehman collapse."

Chicago Tribune, Feb 1, 2010

"The crisis highlighted the inadequacy of many firms' infrastructure in supporting the broad management of financial risks. Significant gaps remain in firms' ability to conduct firm-wide stress tests."

Senior Supervisors Group, Oct 2009



"A practical way to estimate institutions' interconnectedness and their corresponding contribution to systemic risk is required."

IMF, April 2010

"Firms should eschew the silo approach and analyze groupwide risks on an aggregate basis, integrating strands such as credit, market, operational, liquidity and reputational risk."

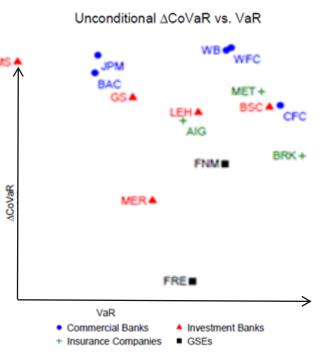
IIF, July 2008



Firm-specific ≠ Systemic Risk Pareto efficiency requires full information

Therefore ...

- New macro-prudential frameworks complement established micro-prudential ones
- "Intrusive" regulatory approaches replace "principles based" models
- Centralized ERM can produce better outcomes than decentralized RM



Source: Adrian and Brunnermeier (2009), CoVaR

Measuring Systemic Risk

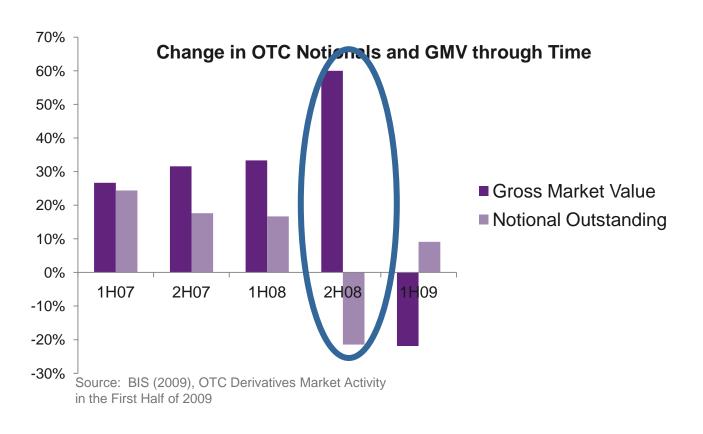
Objectives

- Provide early warning signals
- Assess consequences of stress scenarios
- Determine appropriate systemic risk buffers
- Understand impact of pro-active mitigation and specific interventions
- Timely and actionable analysis



Why Full Simulation? A top-down View

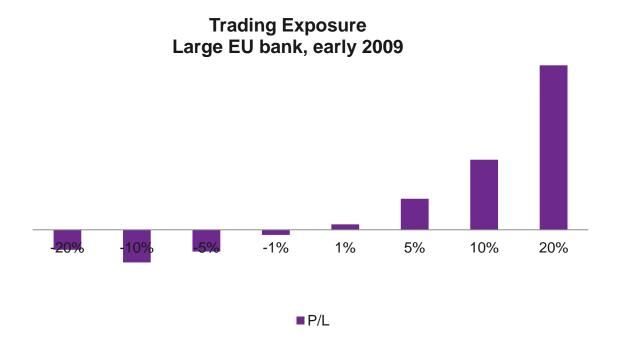
2008: Out-of-the-money puts on Black Swans moved into the money



\rightarrow Exposures are non-linear exactly when it matters!

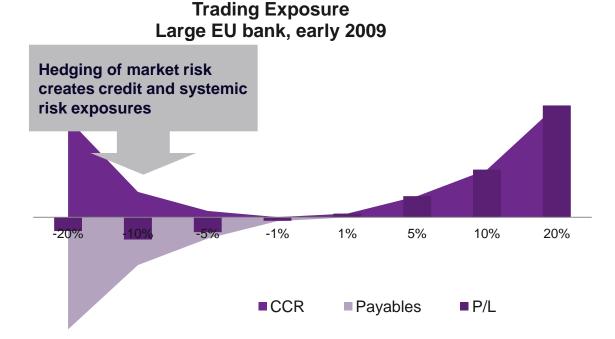
Why Full Simulation? A bottom-up view

2008: Out-of-the-money puts on Black Swans moved into the money



Why Full Simulation? A bottom-up view

2008: Out-of-the-money puts on Black Swans moved into the money



 Market risk factors have material impact on size of systemic risk, e.g. Cont (2009)

More Non-linearity: Market and Credit Risk

Basel 2009

"In certain portfolios market and credit risk are related in a non-linear way. Since this means that they are inextricably linked, conventional approaches that estimate each risk type separately and then aggregate them (such as 'top-down' approaches'), which are widely used in the industry, may lead to sizable biases. [...] An integrated bottom-up approach may be able to avoid [such] biases."

Examples

Foreign currency loans, adjustable rate loans, OTC derivatives, credit transfer, ...

Conceptual Approach to Systemic Risk Simulation

Central simulation platform for all systemically relevant firms

- 1. Position details (T&Cs, risk factors) and credit hierarchies for firms
- 2. Extensive stress testing / simulation of risk factors to assess strength of each firm and determine direct implications (e.g. default, specific responses) by scenario and through time
 - Market risk
 - Credit risk (non interbank obligors)
 - Liquidity risk
- 3. Network model to assess contagion effects across firms by scenario, based on interbank exposures

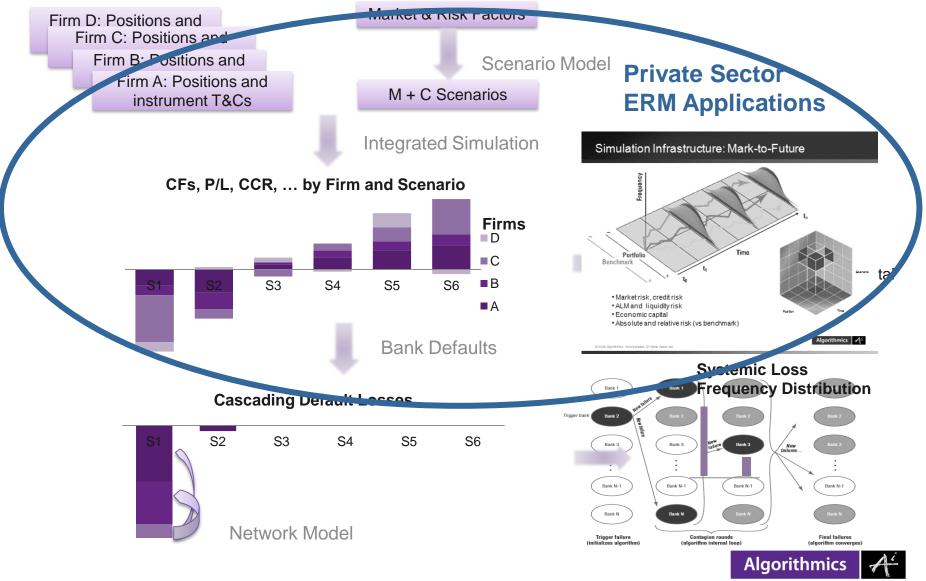
Potential implementation approach discussed in latest GFSR

Similar framework implemented e.g. at Bank of Mexico Algorithmics used within (1) and (2)

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Conceptual Approach to Systemic Risk Simulation

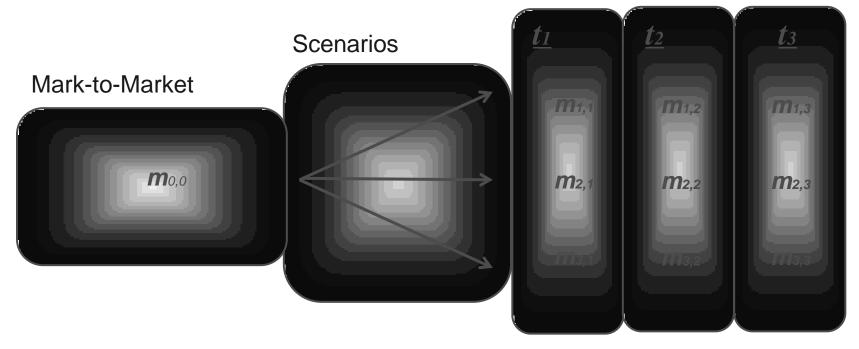


Scenarios Are the Language of Risk

Consider a single financial instrument...

Mark-to-Future:

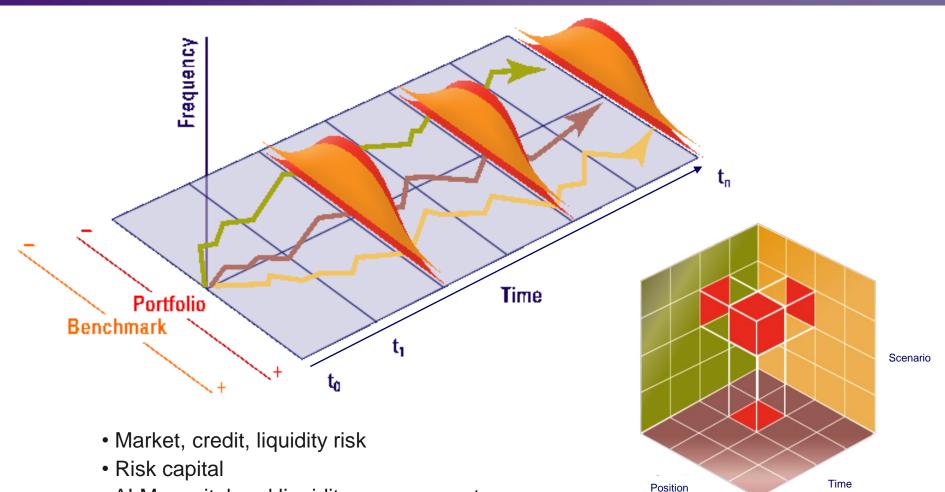
Value, cash flow, income ...



The choice of scenarios defines the relevant risk strands



Generalized Simulation Platform: Mark-to-Future



- ALM, capital and liquidity management
- Absolute and relative risk (vs benchmark)

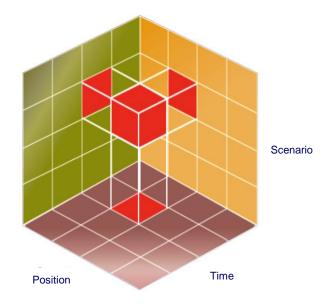
Leveraging Mark-to-Future

Dynamic balance sheet modeling

- Evolve positions through time, conditional on:
 - Risk factor realizations by scenario
 - Portfolio or position characteristics at T or T-n
- Management objectives (funding, target ratios ...)

Scenario optimization

- Determine hedge portfolios
- Design benchmarks and allocation strategies
- Price non-market assets or liabilities





Mark-to-Future: Stress-testing Funding Liquidity

Collateral Calls: Available Cash Over Time 800 600 400 200 -200 -400 -600

AIG, Enron ...

Liquidity coverage ratio must include contingent liquidity needs due to downgrade triggers or potential value changes of derivatives or their collateral

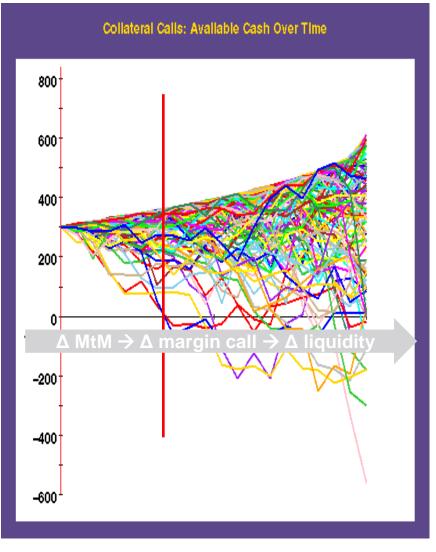
(Basel, 2009)

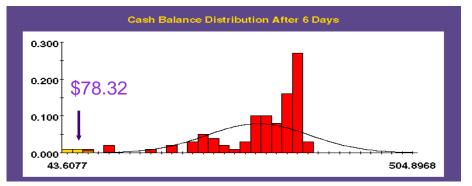
CCPs may result in additional 'pro-cyclical' margin calls

Critical mass of OTC transactions shifting to CCPs may require around \$200 billion *in normal markets*

(Singh, 2010)

Stress-testing Funding Liquidity

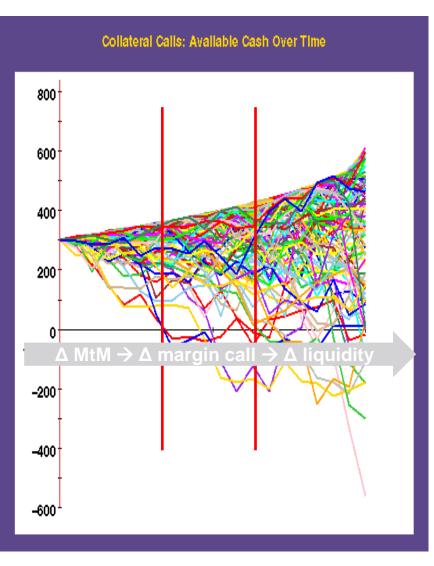


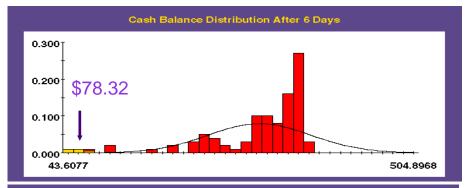


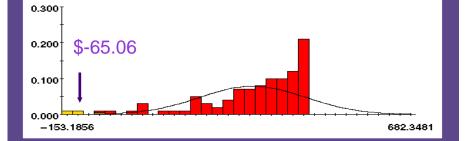
Algorithmics

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Stress-testing Funding Liquidity



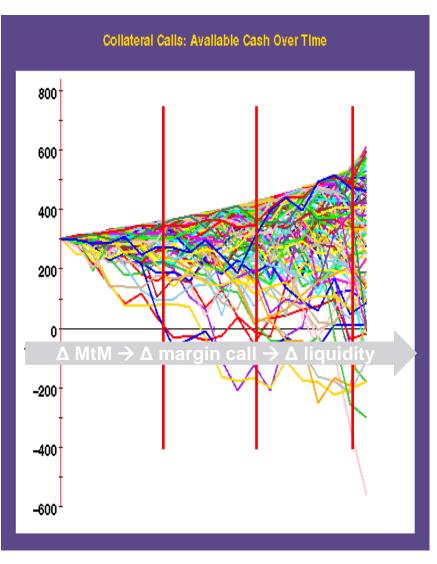


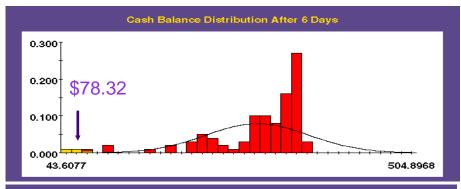


Cash Balance Distribution After 12 Days



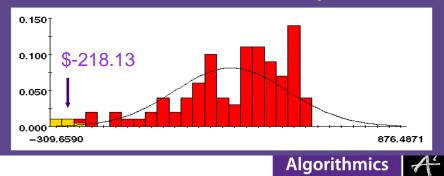
Stress-testing Funding Liquidity







Cash Balance Distribution After 18 Days



Five Challenges: Enterprise Risk

Fundamental Themes

- Define the stakeholders
- Explain. Don't describe
- Imagine. Question assumptions
- Pursue full integration
- Enable meaningful actions

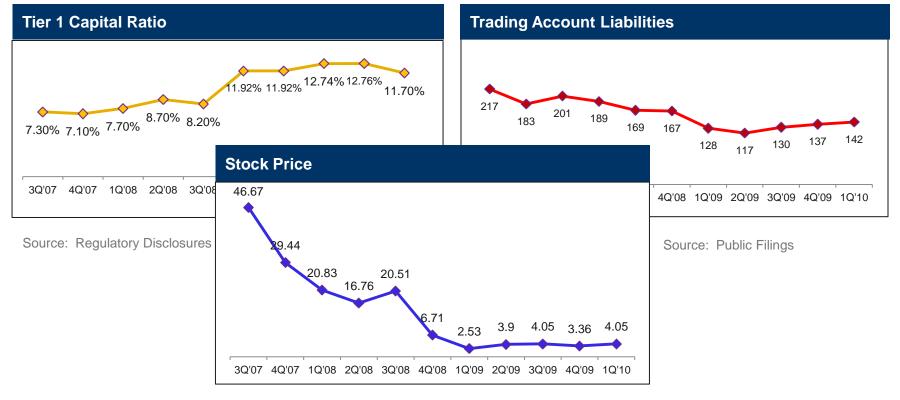


Bus Driver Scalps Bus Thanks To GPS Guidance



1. Define the Stakeholders

Shareholders *≠* Depositors *≠* Regulators *≠* Treasury



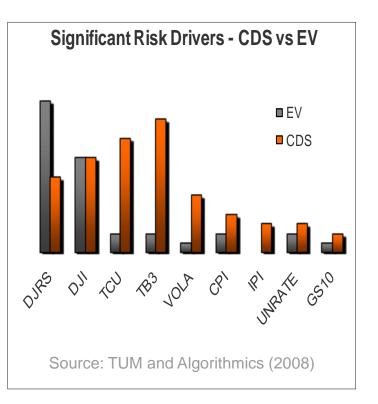
Source: Public Data Sources



2. Explain. Don't Describe

Identify risk drivers

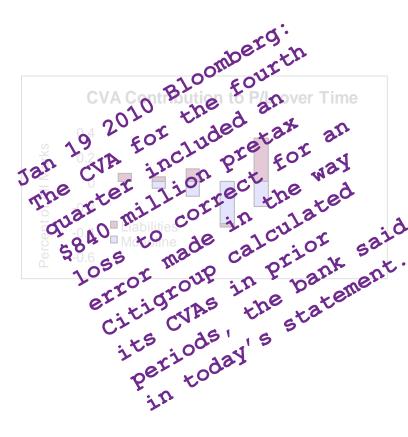
- Acknowledge that the use of data involves subjective judgment
- Build on an intuitive 'story line' rooted in a clear economic interpretation
- Explore what could happen, don't describe what the market implies will happen



2. Explain. Find the Link between Model and Reality

Example: Credit Value Adjustment

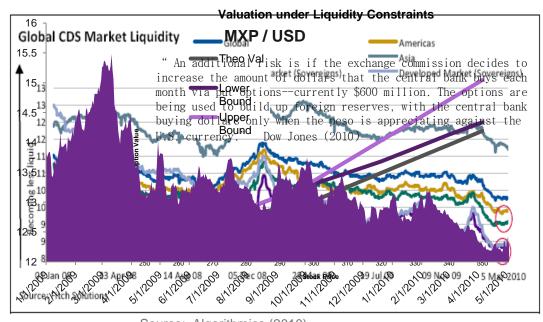
- Why is the credit spread 'risk neutral'?
- How would we hedge CVA changes?
- How would we capture wrong way risk?
- How would we hedge our own default risk?
- How would we aggregate across products?





Challenge common wisdom

- How 'risk-free' is risk-free?
- Are consistencies really 'consistent'?
- How to value FX options issued by the central bank?

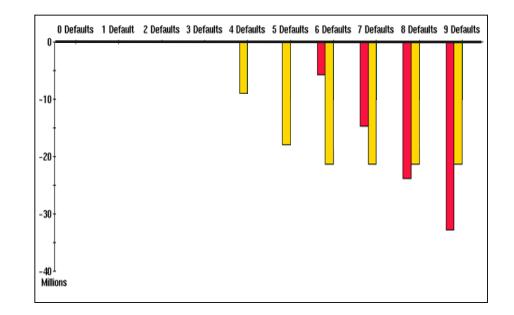


Source: Algorithmics (2010)

Would you consider this position risk free?

Because they were treated as fully hedged, the positions were netted to zero and did not utilize VaR and Stress limits.

UBS (2008)



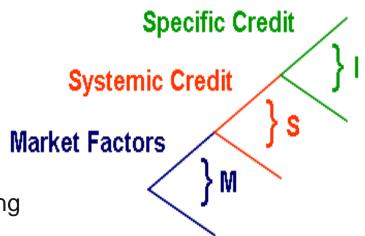
CDO – Shortfall by Tranche

Source: Algorithmics

4. Pursue Full Integration

Next-generation ERM must break down silos

- Firm-wide
- Across all asset and liability classes
- Covering all relevant risks
- Consistent and comparable
- Intuitive: Roughly right, not precisely wrong

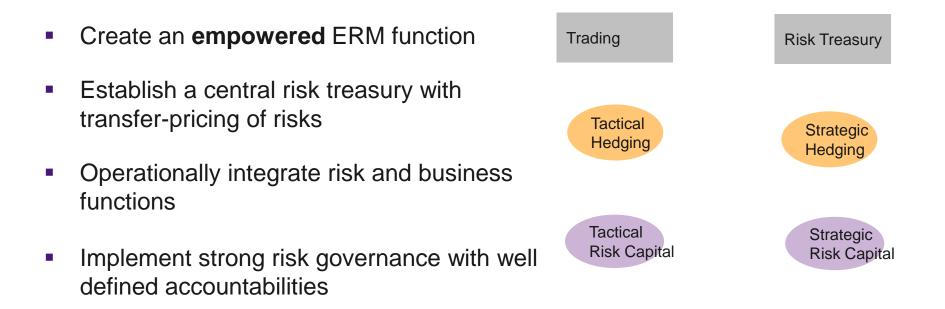


Algorithmics Three-Tier Simulation



5. Enable Meaningful Actions

Risk management matters only if it results in actions



Five Challenges: Systemic Risk

A central simulation platform would enable supervisors to ...

- Develop approaches that are specific to systemic risk
- Imagine and explain: Turn unorthodox story lines into confidential scenarios
- Challenge: Set and modify assumptions
- Integrate: Ensure scenario and modeling consistency
- Enable: Assess impact of actions interactively

'Platform' = Sustainable, scalable, flexible, timely, actionable

Implementation Challenges and Solutions

Granular data = extensive data requirements

- Most relevant firms have the required data and use it (Basel 2, IMM)
- Initiatives exist to establish standard instrument and counterparty definitions
- Compression techniques are used today, e.g. **replication** in insurance

Feasible and efficient simulation models

- **Today's technology** makes system wide simulation feasible
- Efficiency gains with **'conditional' scenarios** and replication

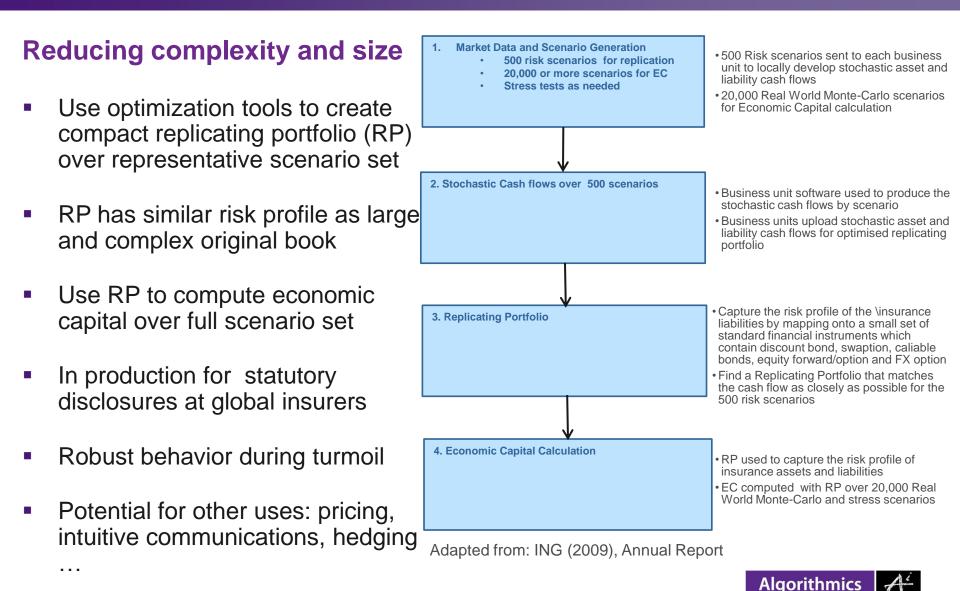
Feasibility: Today's Technology

Processing requirements consistent with industry practice

- Leading firms have 50,000 80,000 CPU grids today
- High level calculations suggest that this would be a very generous upper bound for full systemic risk simulations
- Rapid technological advances (eg GPUs)

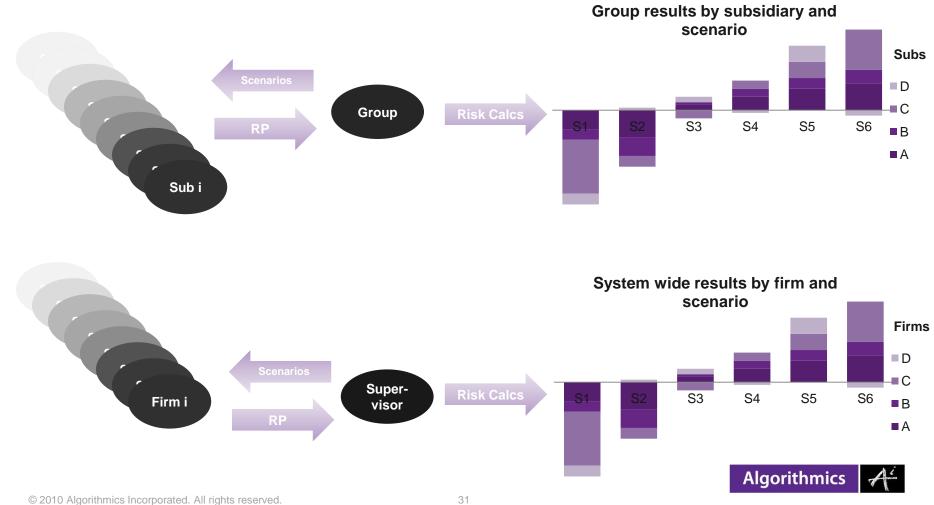
Key decision: Oversight by narratives vs 'hard' measures!

Feasibility: Replication



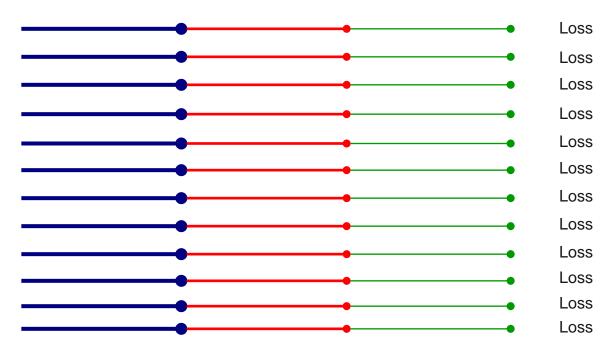
Feasibility: Replication

Applied to systemic risk



Feasibility: Conditional Scenarios

Brute Force: 'One tier' simulation

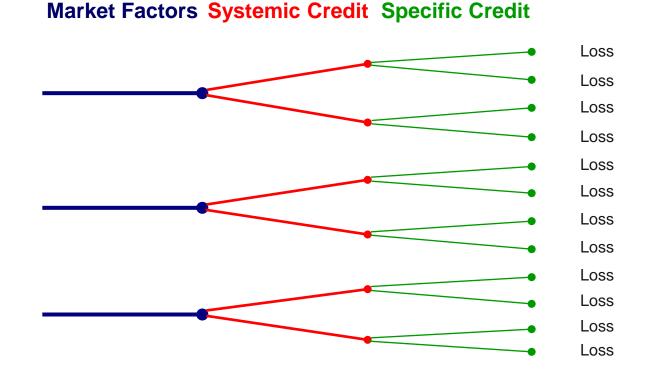


Market Factors Systemic Credit Specific Credit

Feasibility: Conditional Scenarios

'Three tier' simulation

$$Var(\overline{\ell}) = \frac{V_1}{M} + \frac{V_2}{MS} + \frac{V_3}{MSI}$$





ERM and Systemic RM: Potential Commonalities

Understanding the impact of ...

- Exogenous shocks: e.g. stress testing
- Interrelationships between risk strands: e.g. wrong-way risk
- Concentrations: e.g. industries, obligors or risk factors
- Future activities and behavioral responses
- Underlying assumptions and pragmatic implementation choices

To determine risk capital and funding liquidity buffers To set incentives and drive risk-aware decisions

Systemic RM: Unique Characteristics

Understanding the impact of ...

- Assets (receivables) <u>and</u> liabilities (payables)
- Network structure and dependencies
- Endogenous effects, e.g. contagion
- Feedback loops
- Potential interventions

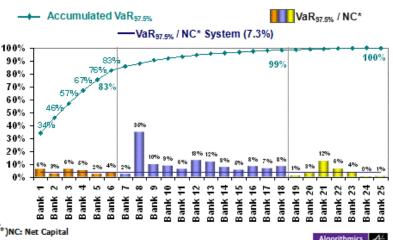
To determine (marginal) systemic risk capital

To enable effective macro-prudential actions and policy

Adapting ERM applications: The Promise

Questions we may be able to answer better ...

- How vulnerable is each firm to specific adhoc stress tests (imaginative macro shocks or specific defaults)?
- Which firms spread or stop cascading defaults?
- What's the marginal systemic risk capital or cost of insurance by firm?
- What is the effect of specific assumptions (modeling or behavioral)?
- Which positions or business areas are of concern across firms or scenarios ?
- How can authorities mitigate the risks pro actively? More capital, a liquidity facility, leverage or liquidity ratios, macro hedges?
- How can authorities target bailouts or other interventions effectively?





Monitoring Risk Characteristics across Firms

Risk Management

Firms are constrained in their ability to effectively aggregate and monitor exposures across counterparties, businesses, risk strands and other dimensions.

Substantial work is still needed.

Senior Supervisors Group (2009)

Systemic Risk

Legislation [...] must include provisions to strengthen research efforts and provide the government with previously unavailable data and analytical capabilities.

Letter to Senator Dodd, Committee to Establish the National Institute of Finance, (February 2010)

HarryMark

Harry Markowitz Adjunct Professor of Finance University of California, San Diego Nobel Prize in Economic Sciences, 1990



Robert F. Engle III Michael Armellino Professor of Finance New York University Stern School of Business Nobel Prize in Economic Sciences, 2003

Tobut C. Meitan

Robert Merton Nobel Prize in Economic Sciences, 1997

Myron S Scholes

Myron Scholes Frank E. Buck Professor of Finance, Emeritus Graduate School of Business, Stanford University Nobel Prize in Economic Sciences, 1997

Will 7. A

William F. Sharpe Professor of Finance, Emeritus Stanford University Nobel Prize in Economic Sciences, 1990

J.An. AA

Vernon Smith Nobel Prize in Economic Sciences, 2002

