

CDS Central Counterparty Clearing Default Measures: Road to Recovery or Invitation to Predation?

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January, 2021

Motivation

- **Post-2008 Dodd-Frank legislation:**
Standardised CDS contracts & Mandated central clearing.
- **Large, Opaque OTC market (\$11.8 Trillion USD):**
CDS mostly bespoke & Largely uncleared.
- **CCP → Global Systemically Important Institution (GSII)**
 - Default fund cannot absorb default of more than 1 or 2 large members.
 - CCP pays *Variation Margin* for life of CDS contract.
- **Lehman Default on Derivative Contracts:**
CCPs left holding large positions
 - CCP must unwind positions quickly (5 days) – common information.
 - Offloaded positions to Barclays at fraction of value.

Research Question

What if a large, global dealer bank failed today...

Could a CCP unwinding strategy trigger **default contagion**:

- If members (distressed) liquidate?
- If members (unconstrained) engage in predation?

Could this result in **CCP failure**?

Is there a **CCP/Regulatory** tool to prevent predation and aid CCP recovery?

Would it be **incentive compatible** for the CCP and Members?

- network problem (star)
- contagion (price-mediated) and amplification (predation)
- multi-agent, multi-asset, multi-period problem

Strands of Literature

I. Predation and Price Feedback Effects

- **(Brunnermeier and Pedersen, 2005)**
Predation model for exchange-based trading (price-transparency).
Predators sell in direction of distressed agents, buyback after liquidation (profit).
 - **Extension:** Model the opaque OTC market

II. Stability in Financial Networks

- **(Cont and Wagalath, 2013)**
Model firesale and price-mediated contagion (indirect), increased covariance in hedge fund portfolios.
 - **Extension:** Explicitly model the covariance between different assets *inside* portfolio.
- **(Amini et al., 2015)**
Examine alternative CCP Design, incentive compatible for banks.
 - **Extension:** Model on-going variation margin exchange, dynamic reaction of banks to defaults, disciplinary mechanism.

Strands of Literature II

III. Determinants of Changes In CDS-Spreads

Empirical Work: Determine that variables thought to explain credit-spread changes, have only fraction of explanatory power.

- **(Collin-Dufresne and Martin, 2001)**

Observe most of credit-spread change is driven by common, systematic component (difficult to explain).

- **Extension:** Theoretical CDS-spread model; permanent and time-dependant component.

- **(Tang and Yang, 2005)**

Determine systematic component has time dimension. Explains the co-movements in credit default spreads.

- Time component persists for max. 2 trading periods or becomes permanent.
- **Extension:** Model CDS-covariance and incorporate in the CDS-spread model.

- **(Tang and Yan, 2017)**

Identify the fundamental determinants of CDS-spread and the effects of excess demand and supply (asymmetric).

- Excess demand driven by info with fundamental content.
- Excess supply liquidity-driven with little such information.
- **Extension:** CDS-spread model has transitory price impact from trading.

Credit Default Swaps

- **Insurance** on reference entity (used for Hedging/Speculating).
- Taken out on **Notional** amount (i.e. Value of bond position).
- Buyer pays **Premium** to seller for life of contract (5-yr Standard).
- Seller pays buyer if **reference entity** defaults (Cash or Physical delivery).
- **Standard CDS** premium is 100 or 500 bps (1 bps = 0.001%).
- Contract entered into a zero value - **Up-front Payment**.
- Market value expressed in **Credit Spread (bps)**, increases with default probability.
- Buyer and seller exchange **Variation Margin** = Credit Spread - Premium
- Feature: Buy/Sell both sides CDS contract multiple times → **Redundant Trades**
 - **Buy-side** (long CDS contract) & **Sell-side** (short CDS contract)
 - **Example 1:** Unwind 'sell' position by buying 'buy' position on asset k
 - **Example 2:** Sell 'sell' position on asset k to another party.

Dealer Banks & The Over-The-Counter CDS Market

- **Large market** (11.8 Trillion USD¹) with bespoke and standard CDS.
- **Over-the-counter trading** (search market).
- **No price transparency**, through dealer banks (bid-ask spread).
- Top 14 (**Core**) dealers own 85% (notional) of global CDS market.
- 75% trades are **Dealer-to-Dealer**.
- Top 14 dealers are members of all large **CCPs** (ICE, CME, LHC-Clearnet²)

(Dealer Banks: Bank of America, N.A. Barclays Capital, BNP Paribas Citigroup, Credit Suisse, Deutsche Bank AG, Dresdner Kleinwort, Goldman, Sachs & Co., HSBC Group, JPMorgan, Chase Morgan Stanley, The Royal Bank of Scotland, Group Societe Generale, UBS AG, Wachovia Bank N.A., A Wells Fargo Company)

¹The CDS market size dropped from \$61 trillion (end 2007) to \$9.4 trillion (2017) due to central clearing.

²ICE Clear Credit clears the largest share of the single-name CDS market with approx. 77.1%, followed by 18.8% for ICE Europe, 3.69% for CME, 0.369% for LCH CDS Clear and 0.0369% for JSCC.

Central Clearing Counterparty

- Facility **mediates** trades - Buyer to every seller, seller to every buyer.
- Ensures adequate **collateral** and **compression** of trades (Min. Counterparty Risk).
- Holds little equity, charges **volume-based fee**.
- **Membership:** Up-front initial margin contribution (Guarantee Fund), smaller Default Fund contribution.
 - Initial Margin is proprietary to dealer, Default Fund is risk-sharing fund.
 - Default Fund is $\approx 10\%$ size of Guarantee Fund, deemed insufficient.
- **Existing CCP Default Waterfall Procedure:** In default use...
 - 1 Member Contribution
 - 2 CCP Equity Tranche
 - 3 Default Fund
 - 4 Remaining CCP Equity
 - 5 ... CCP Failure or Lender of Last Resort!

Results Overview

A Summary of Key Results:

- **Always lower CCP profits** with constrained unwinding (time/equity)
→ *Future research for unwinding strategies.*
- **Predation decreases profits** of all members & pushes all dealers toward default
→ *Institute hybrid fund to disincentivize predation.*
- **Risk-sharing guarantee fund** offers legal, enforceable disciplinary mechanism for predation
→ *Viable for CCP and regulatory intervention.*
- **Risk-sharing guarantee fund** increases protection for CCP equity for a large default
→ *CCP incentive-compatible and increases financial stability.*
- **Risk-sharing guarantee fund** increases effectiveness of bailout by Lender of Last Resort
→ *Margin refill reduces size of bail-out required.*
- **Lender of Last Resort** targeted liquidity injection at distressed dealers
→ *higher likelihood of success when very low/very high levels of distress only.*

Model Setup

- **Star-shaped Financial Network:** CCP connected to members through CDS.
- Network: **CCP** ($i = 0$), **Dealer Members** ($i = \{1, \dots, m\}$),
CDS Reference Entities ($k = \{1, \dots, K\}$)

- **Side (p)** of CDS contract: Buy ($p=B$) or **Sell side** ($p=S$),

$$X^B = +X \quad \text{and} \quad X^S = -X \quad (1)$$

- **Variation Margin**(VM_i) on the nominal value (V_i) of dealer's i CDS portfolio,

$$VM_i \approx [\Delta V_i]^+ = \sum_{k=1}^K X_i^k \Delta S^k(t_\ell) \geq 0 \quad (2)$$

- **Liability:** Dealer i owes to other dealers j in variation margin (on CDS k),

$$L_i^k = \sum_{j=1}^m L_{ij}^k = VM_i^k \quad (3)$$

- **Multi-lateral Netting:** Dealer i 's **net exposure** to counterparties j ,

$$\Lambda_i = \sum_{k=1}^K \left(\sum_{j=1}^m L_{ji}^k - \sum_{j=1}^m L_{ij}^k \right) \quad (4)$$

Covariance and Price impact

- CDS exhibit spread **covariance** - Model can assume a volatility-like structure,

$$X_{ij}^{k,P} \Sigma_{ij} X_{ji}^{k,P} \quad (5)$$

- Specialise to a **linear price impact formulation**,

$$X_{ij}^{k,P} f(X_{ji}^{k,P}) \quad \text{with} \quad f(X_{ji}^{k,P}) = S^k(t_\ell) \left(\frac{X_{ji}^{k,\pm P}}{D_k} \right) \quad (6)$$

- D_k : Vector of **market depth** for CDS assets of type k .
- If S is CDS-spread then ΔS is **change** in CDS-spread,

$$\Delta S^k(t_\ell, t_{\ell-1}) = S^k(t_\ell) - S^k(t_{\ell-1}) \quad (7)$$

- **Price Impact**: Trade (liquidation effect) on spread,

$$S^k(t_\ell) = S^k(t_{\ell-1}) \left(1 - \frac{1}{D_k} \sum_{j \in \mathcal{D}} X_j^k(t_{\ell-1}, t_{\ell-2}) \right) \quad (8)$$

Variation Margin & CDS-spread

- The **change** in the market value of dealer member i 's CDS holding is,

$$\Delta V_i^k = X_i^k \Delta S^k(t_\ell, t_{\ell-1}) = X_i^k \Delta S^k(t_{\ell-1}, t_{\ell-2}) \left(1 - \frac{1}{D_k} \sum_{j \in \mathcal{D}} X_{j, t_{\Delta \ell}}^k \right) \quad (9)$$

- Permanent Price Impact: CDS-spread on k moves due to changes in **fundamentals**³,

$$\Delta S^k(t_{\ell-1}, t_{\ell-2}) \rightarrow \Delta F^k(t_{\ell-1}, t_{\ell-2}) \quad (10)$$

- Temporary Price Impact: from trading/liquidation through $f(X_{j, t_{\Delta \ell}}^k)$
- Absent trading, only change in fundamental CDS-spread alters VM,

$$VM_i^{k,P}(t_\ell) = [X_{ij}^{k,P}(t_{\ell-1}) (\Delta F^k(t_{\ell-1}, t_{\ell-2}))]^+ \quad (11)$$

- With trading, primary and temporary impact on CDS-spread alters VM,

$$VM_{i, (t_\ell)}^{k,P} = \left[X_{ij}^{k,P}(t_{\ell-1}) (\Delta F_{(t_{\ell-1}, t_{\ell-2})}^k - \Delta S_{(t_{\ell-1}, t_{\ell-2})}^k) \frac{1}{D_k} \sum_{j \in \mathcal{D}} X_{j, t_{\Delta \ell}}^k \right]^+ \quad (12)$$

³Where F is a strictly positive, continuous, non-linear function (e.g. polynomial, trigonometric function bounded from the bottom by zero.)

Concept: Covariance Map

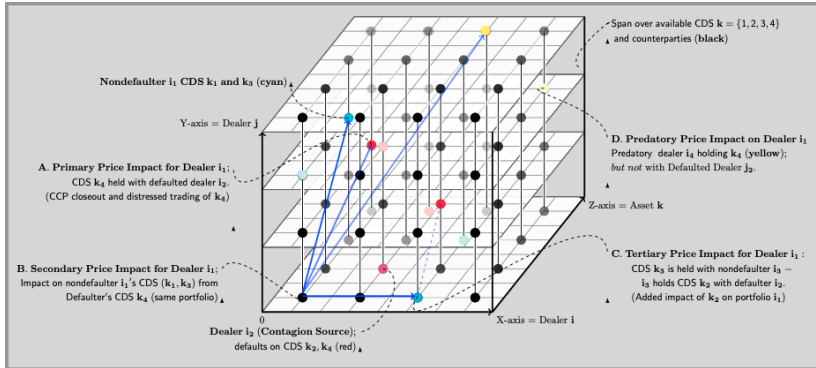


Figure: Covariance relationships Covariance relationships between CDS and counterparties in financial network - defined by the distance of dealers' CDS (colour) positions from a defaulter's CDS positions which are undergoing close-out by CCP.

The Mathematical Structure I: Symbolic Form

- If no trading before $S^k(t_\ell) = F^k(t_{\ell-2} - f(X_{j,t_{\Delta\ell}}^k)^k)$ then $S^k(t_{\ell-1}) = F^k(t_{\ell-2})$
- The cumulative effect of the price impact can be seen by looking at the change in spread over the next time increment, in terms of the fundamentals (proof in appendix),

$$\begin{aligned} \Delta S^k(t_{\ell+1}, t_\ell) &= \left[F^k(t_\ell) - \frac{S^k(t_\ell)}{D^k(t_\ell)} \sum_{j \in \mathcal{D}} X_{j,(t_\ell)}^k \right] \\ &\quad - \left[F^k(t_{\ell-1}) - \frac{S^k(t_{\ell-1})}{D^k(t_{\ell-1})} \sum_{j \in \mathcal{D}} X_{j,(t_{\ell-1})}^k \right] \\ &= \underbrace{F_{t_\ell}^k - F_{t_{\ell-1}}^k}_{\Delta F_{t_\ell, t_{\ell-1}}^k} - \underbrace{f_{t_\ell}(F_{t_{\ell-1}}^k)}_{P_1} + \underbrace{f_{t_{\ell-1}}(F_{t_{\ell-2}}^k)}_{P_2} + \underbrace{f_{t_{\ell-1}}(F_{t_{\ell-2}}^k)}_{P_3} \end{aligned} \quad (13)$$

- Where $X_{j,t_{\Delta\ell}}^k$ is the trading rate $A_{j,t_{\Delta\ell}}^k$ at $\tau = t_{\Delta\ell}$

The Mathematical Structure IIa: Full Formula

- If $X_{j,t_{\Delta\ell}}^k$ is the trading rate $A_{j,t_{\Delta\ell}}^k = \sum_j a_{ji,t_{\Delta\ell}}^k$ per $\tau = t_{\Delta\ell}$.
- And dealers trade due to other dealers' optimal trading, the cds-spread from motivated trading is,

$$\begin{aligned}
 \sum_k \Delta S^k(t_{\ell+2}, t_{\ell+1}) = & \sum_k \left[F^k(t_{\ell+1}) - F^k(t_{\ell}) - \underbrace{F^k(t_{\ell}) \frac{\sum_{j \in \mathcal{D}} A_{j,(t_{\ell+1})}^k}{D_{(t_{\ell+1})}^k} \tau}_{\text{CCP leads primary trading}} \right. \\
 & + \underbrace{F^k(t_{\ell-1}) \frac{\sum_i A_{i,(t_{\ell+1})}^k}{D_{(t_{\ell+1})}^k} \tau \frac{\sum_i A_{i,(t_{\ell})}^k}{D_{(t_{\ell})}^k} \tau}_{\text{Primary distressed quick reaction}} + \underbrace{F^k(t_{\ell-1}) \frac{\sum_j A_{j,(t_{\ell})}^k}{D_{(t_{\ell})}^k} \tau}_{\text{Primary predatory delay}} \\
 & \left. - \underbrace{F^k(t_{\ell-2}) \frac{\sum_j A_{j,(t_{\ell})}^k}{D_{(t_{\ell})}^k} \tau \frac{\sum_i A_{i,(t_{\ell-1})}^k}{D_{(t_{\ell-1})}^k} \tau}_{\text{Secondary distressed delay}} + \underbrace{F^k(t_{\ell-2}) \frac{\sum_{j''} A_{j'',(t_{\ell+1})}^k}{D_{(t_{\ell+1})}^k} \tau \frac{\sum_j A_{j,(t_{\ell})}^k}{D_{(t_{\ell})}^k} \tau \frac{\sum_i A_{i,(t_{\ell-1})}^k}{D_{(t_{\ell-1})}^k} \tau}_{\text{Tertiary downstream response}} \right]
 \end{aligned}$$

The Mathematical Structure IIb: Full Form

- *OTC market price intransparency* permits only a partial view of market prices and trading rates - **dealers can only trade the visible market price not the fundamental price!**
- Each dealer chooses optimal trading rate by approximating average market trading rate (of other traders).
- This shifts the price and permits the exchange (proof appendix) to the tradeable price $S_{t_{\ell}^*}^k$ such that,

$$F_{t_{\ell}-1}^k \frac{A_i^k}{D^k} \tau \rightarrow S_{t_{\ell}^*}^k \frac{A_i^k}{D^k} \tau \quad (14)$$

- The change in spread then incorporates a shift from the fundamental value,

$$S_{t_{\ell+1}}^k - S_{t_{\ell}}^k = - S_{t_{\ell}^*}^k \frac{A_j^k \tau(t_{\ell+1}, t_{\ell})}{D_{(t_{\ell})}^k} = \Delta S_{(t_{\ell+1}, t_{\ell})}^k \quad (15)$$

- Dealers mis-estimation of trading rates and subsequent shift in spread from fundamentals *obscures the price impact of dealers' own trading...*

Thus, predators become prey to own predatory behavior!

The Mathematical Structure IIc: Full Form

Proposition 1: A dealer's variation margin, given by the changing value of its portfolio, is determined by the type and size of CDS positions ($X_i^k = \sum_j^m X_{ij}^k$), as well as, the changing CDS-spread (ΔS^k). The spread captures the magnitude of price impact exerted on the value of a dealer's CDS portfolio from market trading of a defaulter's CDS portfolio – based on the degrees of counterparty covariance between the particular CDS comprising those portfolios.

$$\begin{aligned}
 \sum_k^K X_i^k \Delta S_{t_{\ell+2}, t_{\ell+1}}^k &= \sum_k^K X_i^k \left[\underbrace{\Delta F_{(t_{\ell+1}, t_{\ell})}^k}_{\text{fundamental spread}} - \underbrace{S_{t_{\ell^*+1}}^k \frac{\sum_{j \in \mathcal{D}}^m a_{0j}^k \tau_{(t_{\ell+2}, t_{\ell+1})}}{D_{t_{\ell+1}}^k}}_{\text{CCP close-out liquidation}} \right. \\
 &\quad \left\{ - \underbrace{\Delta S_{(t_{\ell+1}, t_{\ell})}^k \frac{\sum_{i,j \in \mathcal{D}}^m a_{ij}^k \tau_{(t_{\ell+2}, t_{\ell+1})}}{D_{t_{\ell+1}}^k}}_{\text{Distressed liquidation impact}} + \underbrace{S_{t_{\ell^*}}^k \frac{\sum_{i,j \notin \mathcal{D}}^m a_{ij}^k \tau_{(t_{\ell+1}, t_{\ell})}}{D_{t_{\ell}}^k}}_{\text{Predatory liquidation impact}} \right. \\
 &\quad \left. + \underbrace{\Delta S_{(t_{\ell}, t_{\ell-1})}^k \frac{\sum_{i,j}^m a_{ij}^k \tau_{(t_{\ell+1}, t_{\ell})}}{D_{t_{\ell}}^k}}_{\text{Secondary price impact}} - \underbrace{[S_{t_{\ell^*-1}}^k + \Delta S_{(t_{\ell+1}, t_{\ell})}^k] \frac{\sum_{i,j}^m a_{ij}^k \tau_{(t_{\ell+2}, t_{\ell+1})}}{D_{t_{\ell+1}}^k}}_{\text{Tertiary price impact}} \right]
 \end{aligned}$$

Pure Fund vs. Hybrid Fund

Using CCP Design Framework of (Amini et al., 2015):

- Dealer: Has **Cash** (γ_i), **Initial Margin** (g_i), **External Asset**. (Q_i).
Shortfall: Liquidate **fraction** Z_i of external asset Q_i , for **recovery value** R_i .
- **Guarantee Fund**: Sum of the members' initial margin contributions ($G_i = \sum_{i=1}^m g_i$)
 - **Pure Fund** (Current): Proprietary initial margin contribution.
 - **Hybrid Fund** (Proposed): Risk-sharing initial margin contribution (like Default Fund D_i)
- If **Net-Exposure** of dealer (i) to CCP is negative ($\Lambda_i^- = \sum_{j=1}^m L_{ij} \leq 0$)
 - **Pure Fund**: Initial margin used only after cash and external asset depleted
 - **Hybrid Fund**: Initial margin used before cash or external asset (lower liquidation loss)
- **Incentive Compatibility**:
 - **Pure Fund** : CCP has larger guarantee fund (\bar{G}_i), with CCP surplus (\bar{C}_0)
 - **Hybrid Fund**: CCP has smaller guarantee fund (\hat{G}_i) to meet all shortfalls (\hat{C}_i^-), but larger aggregate member surplus ($\sum_{i=1}^m \hat{C}_i$),

Periods: Liquidation, Buyback, Recovery

Each period ($t = 1, 2, 3$) has (ℓ) trading time-steps ($\tau = 1$ day) $\Rightarrow t_{\ell\tau} \dots$

1 Period I - Closeout

- CCP 5-day unwinding window \propto est. initial margin coverage
- CCP trades at average market rate until $X_{ij \in D}^k = 0 \rightarrow a_0^k = \frac{\sum_{i,j=1}^m a_{ij}^k}{m}$
- Distressed dealers *choose to liquidate* with CCP $\rightarrow a_{i \in D}^k = a_0^k \pm \epsilon_{i=d}^k$
- Predators will liquidate as *fast* as possible without impact $\rightarrow a_i^k = a_j^k \pm \epsilon_{i=p}^k$
 - **Single/Colluding Predators:** liquidate until CCP is finished.
 - **Competing Predators:** finish liquidating before CCP.

2 Period II - Buyback

- Predatory dealers buyback assets.
 - **Single/Colluding Predators:** obtain maximum profit.
 - **Competing Predators:** reap diminished profit due to early buyback.

3 Period III - Resolution/Recovery

- CCP evaluation of remaining guarantee fund.
 - **Pure Fund:** Initial margin contribution returned (If positive).
 - **Hybrid Fund:** Predators *must* replenish initial margin depleted by dealer distress/default (Initial margin membership criteria!).

Theoretical Results I

★ **Prop 2: Price impact on CDS-spread removes decreases info about fundamental value.**

- Trading dynamics (demand/supply) invisible in opaque OTC market.

$$\Delta S^k(t_{\ell\tau}) = \underbrace{v}_{P_0} - \underbrace{\frac{1}{D_k}(S^k(t_{\ell-1}\tau) - \sum_i X_i^k(t_{\ell-1}\tau))}_{P_1, \mathcal{P}, P_2, P_3} \quad (16)$$

★ **Prop 3: If one predator predate, then all predators are better off predated:**

- Better off holding smaller position in same side of CDS if decreasing in value.

$$X_{ij}^k(t_{\ell-1}\tau)\Delta S(t_{\ell-1}\tau) \geq [X_{ij}^k(t_{\ell\tau})\Delta S(t_{\ell\tau}) \text{ if } |\Delta S_{t_{\ell-1}\tau}| \geq |\Delta S_{t_{\ell\tau}}|, X_{ij}^k(t_{\ell-1}\tau) = X_{ij}^k(t_{\ell\tau})$$

★ **Prop 4: The price impact of liquidation and predation is cumulative:**

- **For Members:** Amplifies unfavourable CDS-spread movements, dampens positive movements
- **For CCP:** given by lemma 1

$$P_1(3\tau, X_i^k, S(3\tau, a_{ji}^k, \pm(2\ell)), \Delta S^{k,S}(3\tau, X_i^k, S(2\tau), \Delta S^{k,S}(2\tau), P_1(2\tau), \mathcal{P}(2\tau), P_2(1\tau), P_3(1\tau), a_{ji}^k, \pm(2\ell)))$$

Theoretical Results II

★ **Lem 1: Unwinding, CCP feels price/predation impact on income (\downarrow), variation margin (\uparrow):**

- Defaulters' shortfalls carried through periods and met by proceeds from closeouts.

$$L_0(t+s) = L_0(t) + \underbrace{L_0^{\mathcal{D},-}(t+s)}_{L_{ij}^{\mathcal{D},-}(t+s)=X_{t+s} (\Delta S_t + \sum_{s=1}^T \Delta S_{t+s})} \quad \text{where } X_{t+s} \leq X_t$$

★ **Prop 5: In hybrid guarantee fund structure, natural predation disincentive tool:**

- CCP makes margin call on each profitable banks to replenish own initial margin contribution.

$$\hat{G}_i^{\text{M}}(t_{T\tau} = 3) = (g_i - \hat{G}_i^*)$$

★ **Prop 6: Hybrid fund incentive compatible for CCP if shortfall \geq Guarantee Fund + Tranche:**

- CCP expects to be better off using the hybrid approach and protecting its own equity.

$$D_{\text{tot}}^* + (1 - \epsilon)(\gamma_0 + f \sum_{i=1}^m \Lambda_i^+) < \epsilon(\gamma_0 + f \sum_{i=1}^m \Lambda_i^+) + G_{\text{tot}}^* \leq \mathbb{E} [C_0^-(t_{\ell\tau} = 3)]$$

$$\mathbb{E} [\hat{C}_0(t_{\ell\tau} = 3)] \geq \mathbb{E} [\bar{C}_0(t_{\ell\tau} = 3)]$$

Simulation: Description

- **Network (nodes)** & agent-based model (14 dealers + CCP) of discrete event (exogenous default).
- **Dealer behaviour** given by regulation/trading rules (exchange of variation margin)
- Previous **empirical work** provides OTC data [Oehmke and Zawadowski 2017, Darrell Duffie and Vuillemeay 2015, Amini et al. 2015b] for market size, CCP size, dealer holdings, turnover per trading day.
- Notional position size in each CDS, fundamental CDS-spread changes determined with **distribution** created from data parameters.
- **Exogenous default perturbs network producing knock-on effects:**
 - Exogenous default,
 - CCP unwinding, member trading → change in CDS-spread (price impact),
 - Realise variation margin payments, net-exposure, pay CCP/CCP pays, determine defaults,
 - Defaulters' positions moved to CCP account
 - CCP starts unwinding ...

Goal: Visualise CCP-specific default dynamics, pin-point underlying drivers.

Simulation Results Ia: Default Distribution based on Market Depth

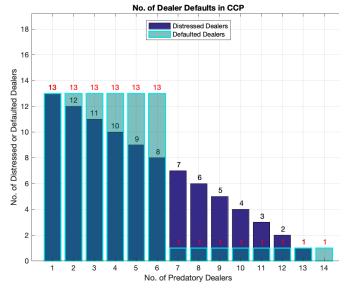
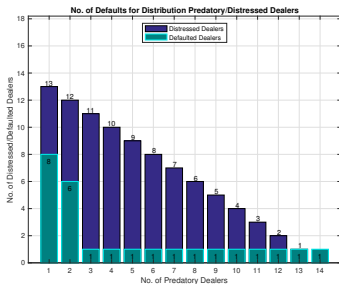


Figure: Under Normal Market Liquidity (left) & Decreasing Market Liquidity (right):
 Shows decreasing dealer distress and increasing predatory banks.
 Defaults increase rapidly with decreasing liquidity.

Simulation Results Ib: Default Distribution based on Market Depth

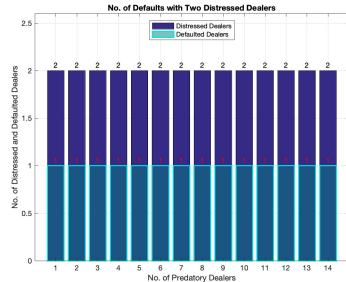
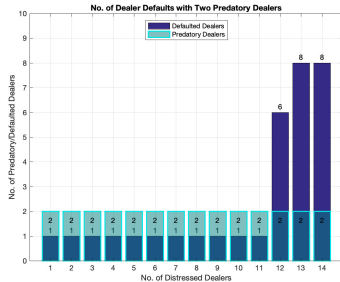


Figure: Under Normal Market Liquidity (left) & Decreasing Market Liquidity (right):
 Low levels of predatory banks does not decrease defaults.
 Defaults highly driven by level of distressed dealers.

Simulation Results II: Final CCP Loss based on Market Depth

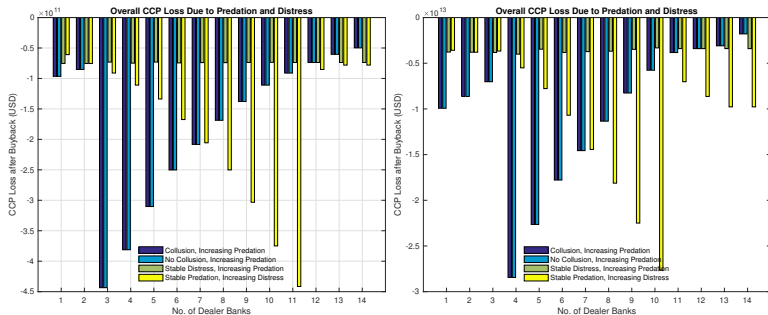


Figure: Under Normal Market Liquidity (left) & Financial Crisis Market Liquidity (right):

Low distressed/predatory dealer levels (yellow/green bars) and level of predator competition (blue and aqua bars). Dealer distress (shortfall) creates larger than predatory profits (refill margin).

Simulation Results III: Final CCP Loss based for Decreasing Market Depth

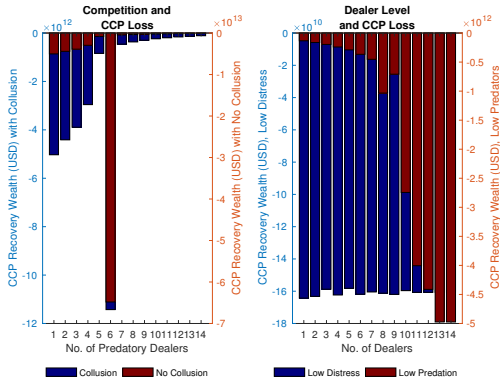


Figure: Decreasing Market Liquidity - Left: Predatory competition (x-axis, red bars) decreases profits and increases CCP losses (y-axis). **Right:** Effect of Low, stable level of predation (red) or distress effect (blue) on CCP losses. The x-axis provides the number of increasing predatory/distressed dealers. Low levels of distressed banks (blue) lowers CCP losses.

Simulation Results IVa: Predation Profits & Margin Refill

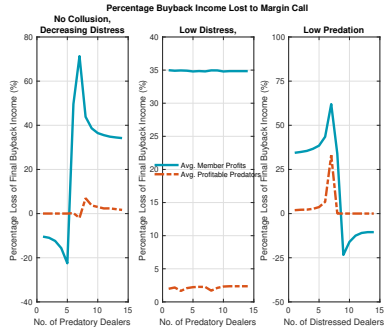


Figure: Under Decreasing Market Liquidity - Realised avg profit loss to margin refill for all members (aqua) vs. profitable predators (red) (after call). Profit loss to margin refill as % of buyback income (y-axis). **Left:** Predation profits outweigh margin refill payment for avg. distress levels (conflict of high profits, but high margin refill from distress vs. loss of predator competition). **Middle:** Low margin refill with low distress (prey). **Right:** Low losses from predatory competition vs. Strong profit decrease from margin refill (high distress).

Simulation Results IVb: Predation Profits & Margin Refill

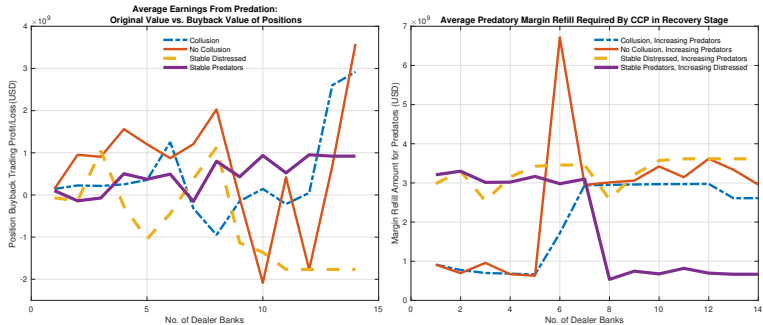


Figure: Under Decreasing Market Liquidity - **Left:** Avg predation earnings/loss (y-axis) in various trading scenarios (colours). Effect of distress level (high prey) and competition (early buyback) on predators' profit/loss in buyback of original positions. **Right:** Avg margin refill (y-axis) by predators alone. Effect of increasing margin demand with decreasing distressed dealers to prey upon (red/blue).

Simulation Results V: Pure vs. Hybrid Wealth for Decreasing Market Depth

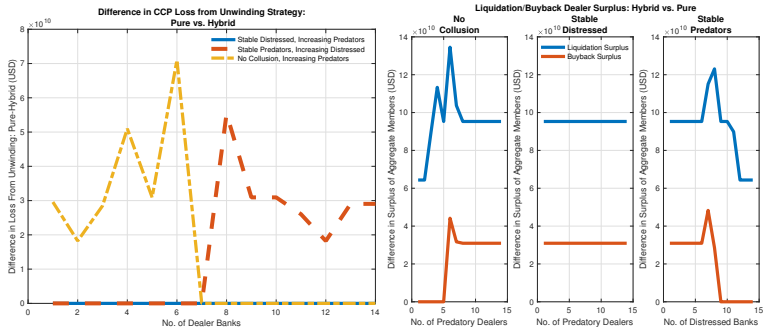


Figure: CCP & Aggregate Member Hybrid Fund Incentive Compatibility -
Left: Equal/larger loss from CCP unwinding (y-axis) with pure vs. hybrid fund.
Right: Higher member surplus (y-axis) for liquidation (blue)/buyback (red) hybrid vs. pure fund. [R1: Increasing predatory competition (x-axis)/decreasing distress. R2: Low level (two) distressed dealers with increasing predation (x-axis). R3: Increasing distress (x-axis) and low level (two) of predators.]

Limitations & Thanks

Simulation Limitations and Possible Extensions:

- Allow formation of new trading contracts (existing change from default/liquidation)
- Obtain (if possible) further data for CDS or for internal CCP procedures (proprietary)
- Introduce covariance/correlation data explicitly (tractability)
- Introduce an empirically estimated size for each price impact effect.

Thank You For Your Time & Your Attention!