

# An Axiomatic Theory for Rating Structured Finance Securities

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2019 China International Conference on Insurance and Risk Management  
Chengdu, China      July 2019

# Agenda

- 1 Background
- 2 Empirical observations
- 3 Subjective prices and tranche exploitation
- 4 An axiomatic formulation of rating criteria
- 5 Some examples

Based on joint work with Nan Guo (China Bond Rating Co.), Bin Wang (Chinese Academy of Sciences) and Steven Kou (Boston University)

# Structured finance securities

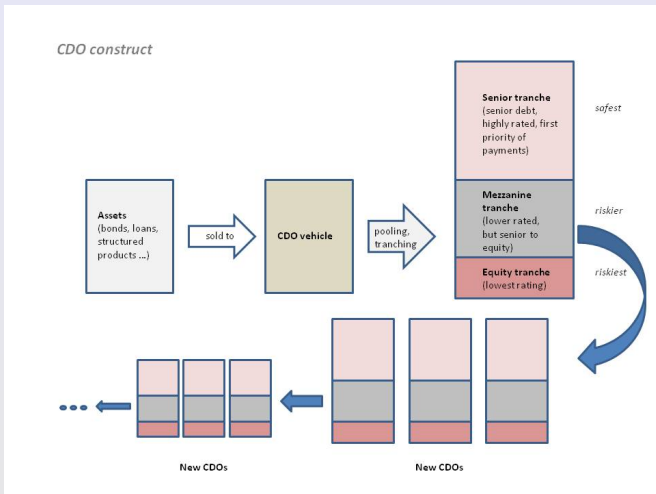
Two-step initialization of structured finance securities

- ▶ **pooling** financial assets, such as corporate bonds, auto loans, and mortgages, into a large portfolio
  - a Special Purpose Vehicle (SPV)
- ▶ **tranching** the portfolio into sequential classes of securities
  - e.g. CDOs

A key goal of the structuring process is

- ▶ to create at least one class of securities whose rating is **higher than the average rating** of the underlying collateral pool.
- ▶ Reason: **some** investors are happy to hold a **speculative grade bond**, while **most** seek **safer bonds**.

# CDOs: an example



# Credit ratings

- ▶ **Credit ratings** are categorical characteristics of defaultable securities (bonds)
  - AAA, AA, A, BBB, ...
- ▶ Investors rely heavily on credit ratings as a basis for **pricing and risk management**

## Primary examples.

- ▶ **Standard and Poor's (S&P)** and **Fitch** use the **probability of default (PD)** as their primary rating factor
- ▶ **Moody's** uses the **expected loss (EL)** as the primary rating factor

# General settings for rating criteria

## Some basic components

- ▶ A probability space  $(\Omega, \mathcal{F}, \mathbb{P})$
- ▶  $\mathcal{L}^\infty$  is the set of bounded random variables;  $\mathcal{L}_{[0,1]}$  is the set of  $[0, 1]$ -valued random variables
- ▶ The set  $\mathcal{X}$  of all possible “bonds”

$$\mathcal{X} = \{(L, M) \in \mathcal{L}^\infty \times \mathbb{R}_+ : 0 \leq L \leq M\};$$

- ▶  $(L, M)$  represents
  - asset pools, tranches, defautable bonds, ...
  - loss  $L$  and nominal value  $M$
  - with “similar” maturities (one-period)

# General settings for rating criteria

## Definition

A **rating criterion** is  $\mathcal{I} : \mathcal{X} \rightarrow \{1, \dots, n\}$  satisfying

[SI] **Scale invariance**:  $\mathcal{I}(\lambda L, \lambda M) = \mathcal{I}(L, M)$  for all  $(L, M) \in \mathcal{X}$   
and  $\lambda > 0$ .

Write  $I_k = \{(L, M) \in \mathcal{X} : \mathcal{I}(L, M) = k\}$ ,  $k = 1, \dots, n$ .

- ▶  $I_1$  is the **best** rating (e.g. AAA),  $I_n$  is the **lowest** rating (e.g. D)
- ▶ For  $(L, M) \in \mathcal{X}$ , it is sufficient to consider  $L/M \in \mathcal{L}_{[0,1]}$

# Primary examples

## Example

- ▶ **The PD criterion:** For some  $p_0 < 0 < p_1 < \dots < p_n = 1$ ,

$$I_k = \{(L, M) \in \mathcal{X} : \mathbb{P}(L > 0) \in (p_{k-1}, p_k)\}.$$

- ▶ **The EL criterion:** For some  $q_0 < 0 < q_1 < \dots < q_n = 1$ ,

$$I_k = \{(L, M) \in \mathcal{X} : \mathbb{E}[L/M] \in (q_{k-1}, q_k)\}.$$



# Key question

## PD, EL, or another?

Large literature (and many recent) on risk measures

- ▶ VaR versus ES, or others (Basel III/IV, Solvency II, SST, ...)
- ▶ Mathematical considerations
  - modeling, optimization, computation, complexity, ...
- ▶ Statistical considerations
  - uncertainty, robustness, backtesting, inference, ...
- ▶ **Economic axioms** (e.g. **Artzner-Delbaen-Eber-Heath'99 (MF)**)

Limited or no literature on axiomatic approach for rating criteria?



# The Bloomberg CDO database

- ▶ Rating coverage of all CDOs listed on Bloomberg (in US\$), all rated by S&P, Moody's or Fitch
- ▶ Issuance dates from January 1997 to December 2018
- ▶ The **Dodd-Frank Act** was passed on **July 2010**
  - The pre-Dodd-Frank period: 1,782 deals (\$0.92 trillion)
  - The post-Dodd-Frank period: 1,792 deals (\$1.29 trillion)

# Rating coverage

Panel A: Deal-level rating coverage

	Before Dodd-Frank			After Dodd-Frank		
	Number	Capital (\$B)	% capital	Number	Capital (\$B)	% capital
Solo rating	170	56.3	5.9	283	159.0	12.3
S&P	61	15.9	1.7	112	51.4	4.0
Moody's	81	33.8	3.5	167	102.5	7.9
Fitch	28	6.6	0.7	4	0.2	0.4
Multiple ratings	1612	903.3	94.1	1509	1130.8	87.7
SP & Moody's	1189	680.2	70.9	686	528.5	41.0
SP & Fitch	68	24.0	2.5	141	95.8	7.4
Moody's & Fitch	41	19.4	2.0	673	497.8	38.6
S&P, Moody's and Fitch	314	179.7	18.7	9	8.6	0.7

Panel B: Tranche-level rating coverage

AAA rated Tranches	3434	674.4	79.5	2733	530.6	65.8
non-AAA rated Tranches	6522	173.8	20.5	8015	275.5	34.2
Total	9956	848.2	-	10748	806.1	-

# Numbers of deals dual related by S&P and Moody's

	Year	S&P non-AAA	Moody's non-AAA	Both non-AAA
Before crisis	1997	0	0	0
	1998	3	1	1
	1999	9	0	3
	2000	2	10	16
	2001	0	14	35
	2002	1	2	69
	2003	0	5	65
	2004	1	5	99
	2005	0	1	188
	2006	1	9	402
Crisis	2007	4	9	335
	2008	0	1	30
	2009	0	1	0
After Dodd- Frank	2010	0	0	6
	2011	23	0	6
	2012	82	3	18
	2013	127	13	15
	2014	84	23	10
	2015	33	18	16
	2016	33	28	4
	2017	35	17	34
	2018	37	5	21

# Numbers of deals grouped by numbers of tranches

Distribution of deal numbers dual related by S&P and Moody's

Number of tranches	Before Dodd-Frank			After Dodd-Frank		
	S&P non-AAA	Moody's non-AAA	Both non-AAA	S&P non-AAA	Moody's non-AAA	Both non-AAA
2	3	15	31	3	1	1
3	2	15	123	10	5	4
4	14	22	311	4	8	8
5	1	2	459	265	62	39
6	1	2	199	166	30	75
7	0	2	65	6	1	0
8–13	0	0	54	0	0	0
Total	21	58	1242	454	107	127
Mean	3.762	3.431	4.908	5.319	5.103	5.441
Std.	0.944	1.216	1.396	0.688	0.812	0.813

# Number of tranches and rating methods

	Before Dodd-Frank		After Dodd-Frank	
	(1)	(2)	(3)	(4)
S&P non-AAA	0.415 (1.052)	0.571 (1.432)	0.429 (5.982)	0.217 (2.897)
Moody's non-AAA	-0.321 (-1.424)	-0.124 (-0.484)	0.125 (1.171)	-0.02 (-0.193)
Both non-AAA		0.359 (2.372)		0.277 (2.777)
Solo S&P		-1.1414 (-4.529)		-1.583 (-12.417)
Solo Moody's		-1.2545 (-5.520)		-0.996 (-7.96)
Deal size	0.711 (18.277)	0.559 (13.682)	0.249 (5.095)	0.042 (0.850)
Collateral controls	y	y	n	n
Year controls	y	y	y	y
Issuer controls	n	n	y	y
No. Obs.	1782	1782	1792	1792
$R^2$	0.320	0.357	0.608	0.649

# Summary of empirical observations

- ▶ S&P and Moody's are the main raters
- ▶ For non-AAA tranches, after Dodd-Frank:
  - non-AAA tranches increase in terms of capital percentage
  - dual rating almost disappears
  - S&P tends to be more attractive to issuers
  - S&P tends to generate more tranches
- ▶ Question: Is there a theoretical explanation of the empirical observations, especially after Dodd-Frank?



## Related literature

- ▶ Credit shopping and credit catering between agencies:  
Fender-Kiff'05 (JCR), Griffin et al.'13 (RFS)
- ▶ Rating arbitrage: Hull-White'12 (JDer)
- ▶ Gains from tranching: Brennan et al.'09 (EFM)
- ▶ Critiques of credit ratings: Coval et al.'09 (AER), Wojtowicz'14 (JBF), Cornaggia-Cornaggia'13 (RFS), Cornaggia et al.'17 (RoF)
- ▶ Choquet integrals: Yaari'87 (ECMA), Kou-Peng'16 (OR), W.-Wei-Willmot'19 (MOR)
- ▶ (Systemic) risk measures: Chen et al.'13 (MS), Cherny-Madan'09 (RFS), Acharya et al.'12 (AER), Acharya et al.'17 (RFS)
- ▶ Scenario-relevance: W.-Ziegel'18



# Subjective prices

Rating criteria are a pricing reference for both investors and issuers

- ▶ We need to connect the two considerations

How does rating affect prices?

- ▶ Ashcraft-GoldsmithPinkham-Hull-Vickery'11 (AER) on MBS:
  - study: causal effect of ratings on security prices
  - result: “MBS prices are *excessively* sensitive to credit ratings, relative to the informational content of ratings.”
- ▶ We assume an idealistic mathematical world:
  - issuers use rating as a prediction of average security prices
  - investors use ratings as a reference for pricing

# Subjective prices

## Definition

A functional  $p : \mathcal{X} \rightarrow \mathbb{R}_+$  is called a (subjective) price of defaultable bonds if it satisfies

- ▶  $p(L_1, M) \geq p(L_2, M)$  for all  $(L_1, M), (L_2, M) \in \mathcal{X}$  with  $L_1 \leq L_2$ ;
- ▶  $p(\lambda L, \lambda M) = \lambda p(L, M)$  for  $\lambda \in \mathbb{R}_+$  and  $(L, M) \in \mathcal{X}$ .

- ▶ Each investor/issuer may have their own subjective price

# Subjective prices

## Connecting ratings and prices

- ▶ A subjective price  $p$  is **compatible** with  $\mathcal{I}$  if for all  $(L_1, M)$ ,  $(L_2, M) \in \mathcal{X}$ ,

$$\mathcal{I}(L_1, M) < \mathcal{I}(L_2, M) \Rightarrow p(L_1, M) > p(L_2, M). \quad (1)$$

- ▶  $p$  is **strictly compatible** with  $\mathcal{I}$  if “ $\Rightarrow$ ” in (1) holds as “ $\Leftrightarrow$ ”.

## “Higher rating, higher price”

- ▶ **Investors** use rating as a **reference**  $\Rightarrow$  compatibility
- ▶ **Issuers** use rating as a **prediction**  $\Rightarrow$  strict compatibility

# Subjective prices

Trade-off between compatible and strictly compatible prices

- ▶ A compatible price can take **continuous values**, more flexible
- ▶ A strictly compatible price only takes **discrete values** for bonds with nominal 1
- ▶ **Information asymmetry**  $\Rightarrow$  **a market for lemons**<sup>1</sup>  $\Rightarrow$  strictly compatible prices are **reasonable approximations** of market prices

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<sup>1</sup>Downing-Kaffee-Wallace (2009 RFS)

# Tranche exploitation

Tranching schemes:

- ▶ A defaultable bond  $(L, M) \in \mathcal{X}$
- ▶ An issuer issues  $m$  tranches of  $(L, M)$

A **tranching scheme** of  $(L, M)$  is a vector  $(K_1, \dots, K_m)$

- ▶ Each  $K_j$  is a **tranche level**,  $M > K_1 > \dots > K_{m-1} > K_m = 0$
- ▶  $(L, M)$  itself is a trivial tranching scheme  $(0)$  with  $m = 1$
- ▶ The  $j$ -th tranche is  $((L - K_j)_+ \wedge (K_{j-1} - K_j), K_{j-1} - K_j)$   
where  $K_0 = M$ .

# Tranche exploitation

- ▶ For a subjective price  $p$ , the **portfolio value** of the tranching scheme  $(K_1, \dots, K_m)$  is

$$\sum_{j=1}^m p((L - K_j)_+ \wedge (K_{j-1} - K_j), K_{j-1} - K_j).$$

- ▶ To get a higher total value, the issuer tries to maximize the above value over  $m$  and  $(K_1, \dots, K_{m-1})$ .



# Tranche exploitation

For a given rating criterion  $\mathcal{I}$ :

- ▶ A tranching scheme is **maximal** if it has the maximum number of distinct rating categories among all tranching schemes of the same bond

## Definition

$\mathcal{I}$  leads to **tranche exploitation** for a subjective price  $p$ , if **for all**  $(L, M) \in \mathcal{X}$ , a **maximal tranching scheme strictly dominates all non-maximal tranching schemes** in value.

- ▶  $\mathcal{I}$  leads to tranche exploitation for  $p \Rightarrow$  the issuer (using  $p$ ) issues as many tranches of different credit ratings as possible

# Tranche exploitation

## Proposition

*The PD criterion leads to tranche exploitation for all strictly compatible prices, and for  $n \geq 3$ , the EL criterion does not lead to tranche exploitation for any strictly compatible prices.*

- ▶ The PD criterion as pricing reference  $\Rightarrow$  excessive issuance of tranches, regardless of the actual pricing scheme used
- ▶ Partly explains the empirical observations

# Tranche exploitation

Is tranche exploitation a bad thing?

- ▶ Does a tranching scheme **increase the overall value of the asset pool**?
- ▶ In the spirit of the **MM Theorem<sup>2</sup>**, the value of the collateral pool and that of the tranches should be equal
  - An asset pool is an SPV, usually a limited company
- ▶ **Investors** (as a whole) pays more than they should

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<sup>2</sup>Modigliani-Miller'58 (AER)

# Progress

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# Balanced prices

Motivated by the **MM Theorem**

## Definition

A subjective price  $p : \mathcal{X} \rightarrow \mathbb{R}_+$  is **balanced** if it satisfies

$$p((L - K)_+, M - K) + p(L \wedge K, K) = p(L, M)$$

for  $(L, M) \in \mathcal{X}$  and  $K \in [0, M]$ .

- ▶ A tranching scheme does not change the value of the portfolio
- ▶ A sophisticated investor's price is balanced
- ▶ A reasonable rating criterion should **be acceptable** for some sophisticated investors

# Self-consistency

The first axiom

[SC] **Self-consistency**: there **exists** a balanced subjective price compatible with the rating criterion  $\mathcal{I}$ .

## Proposition

*The EL criterion is self-consistent, and, for  $n \geq 3$ , the PD criterion is not.*

Self-consistency and tranche exploitation:

## Theorem

*Assume  $n \geq 3$ . A self-consistent rating criterion does not lead to tranche exploitation **for any strictly compatible subjective price.***

# Economic scenario relevance

For a collection of scenarios  $S = (S_1, \dots, S_m)$  and  $X, Y \in \mathcal{L}^\infty$   
write  $X \overset{S}{\sim} Y$  if  $X \stackrel{d}{=} Y$  on  $S_j$  for each  $j = 1, \dots, m$ .

[SR] **Scenario relevance** (with respect to  $S$ ):  $\mathcal{I}(L_1, M) = \mathcal{I}(L_2, M)$   
for all  $(L_1, M), (L_2, M) \in \mathcal{X}$  satisfying  $L_1 \overset{S}{\sim} L_2$ .

- ▶ If  $S$  is a constant, [SR] reduces to the standard property of **law-invariance** [LI]
- ▶ [LI]  $\Rightarrow$  [SR]
- ▶ Both the PD and the EL criteria satisfies [LI] and [SR]
- ▶ Scenario-based risk measures (**W.-Ziegel'18**)

# Characterization theorems

## Definition

A **rating measure**  $\rho : \mathcal{L}_{[0,1]} \rightarrow \mathbb{R}$  **generates**  $\mathcal{I}$  if for some ordered partition  $(J_1, \dots, J_n)$  of  $\mathbb{R}$  and  $k = 1, \dots, n$ ,

$$I_k = \{(L, M) \in \mathcal{X} : \rho(L/M) \in J_k\}.$$

- ▶ PD, EL, ...



# Characterization theorems

## Theorem

Fix a collection of scenarios  $S$ . A rating criterion  $\mathcal{I}$  satisfies [SC] and [SR] if and only if it is generated by

$$\rho(X) = \int_0^1 h(\mathbb{P}(X > x|S_1), \dots, \mathbb{P}(X > x|S_m)) dx, \quad X \in \mathcal{L}_{[0,1]},$$

for some increasing function  $h : [0, 1]^m \rightarrow \mathbb{R}$  with  $h(\mathbf{0}) = 0$ .

Example.

$$\rho(X) = \sum_{j=1}^m \int_0^\infty h_j(\mathbb{P}(X > x|S_j)) dx,$$

where  $h_j$  is an increasing function on  $[0, 1]$  with  $h_j(0) = 0$ .

# Characterization theorems

## Corollary

A rating criterion  $\mathcal{I}$  satisfies [SC] and [LI] if and only if it is generated by

$$\rho(X) = \int_0^1 h(\mathbb{P}(X > x)) dx, \quad X \in \mathcal{L}_{[0,1]}$$

for some increasing function  $h : [0, 1] \rightarrow \mathbb{R}$  with  $h(0) = 0$ .

# Progress

- ① Background
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- ⑤ **Some examples**

# Primary examples

## Example (the S&P scenario factor).

- ▶ S&P chooses scenarios  $S_i = \{S = s_i\}$ ,  $i = 1, \dots, m$  to reflect different economic situations
  - e.g. the Great Depression, the Subprime Crisis, ...
  - from the most adverse ( $S_1$ ) to the safest ( $S_m$ )
- ▶ “treat” each loss as a function of  $S$ , i.e.  $L = f_L(S)$
- ▶ a bond  $(L, M)$  is given a rating  $k \in \{1, \dots, m+1\}$  if it can survive scenarios  $S_k, \dots, S_m$  but not  $S_{k-1}$ , i.e.

$$\mathcal{I}(L, M) = \max\{k \in \{1, \dots, m+1\} : f_L(s_{k-1}) > 0\}.$$

- ▶ It is a PD criterion if  $f_L$  is an increasing function.

# Primary examples

Example (the **Moody's** scenario factor for synthetic CDOs).

- ▶ Use a **standard Gaussian copula model** for the portfolio backing the synthetic CDO
- ▶ Specify **three scenarios**:  $S_i = \{\Sigma = \Sigma_i\}$ ,  $i = 1, 2, 3$  representing low, medium and high correlations in the portfolio
- ▶ Specify **weights**  $(\lambda_1, \lambda_2, \lambda_3) = (0.7, 0.2, 0.1)$

- ▶ Calculate

$$\rho \left( \frac{L}{M} \right) = \sum_{i=1}^3 \lambda_i \mathbb{E} \left[ \frac{L}{M} \mid S_i \right]$$

- ▶ Give rating according to the above quantity

## Examples of rating measures

Choose  $h(u_1, \dots, u_m) = \sum_{i=1}^m a_i u_i$ ,  $(u_1, \dots, u_m) \in [0, 1]^m$ ,  
 $a_1, \dots, a_m \geq 0$ , one gets

$$\rho(X) = \sum_{i=1}^m a_i \mathbb{E}[X|S_i], \quad X \in \mathcal{L}_{[0,1]}.$$

This recovers the **Moody's** formula by setting  $S_1, \dots, S_m$  according to correlations.

# Examples of rating measures

For some  $a_1, \dots, a_m \geq 0$  with  $\sum_{i=1}^m a_i = 1$  and  $p \in (0, 1)$ , let  $\text{VaR}_p(X|S_i)$  be the conditional  $p$ -quantile of  $X$  under  $S_i$ .

- ▶ Average VaR:

$$\rho(X) = \sum_{i=1}^m a_i \text{VaR}_p(X|S_i), \quad X \in \mathcal{L}_{[0,1]}.$$

- ▶ Max VaR:

$$\rho(X) = \bigvee_{i=1}^n \text{VaR}_p(X|S_i), \quad X \in \mathcal{L}_{[0,1]}.$$

# Examples of rating measures

For some  $a_1, \dots, a_m \geq 0$  with  $\sum_{i=1}^m a_i = 1$  and  $p \in (0, 1)$ ,

- ▶ Average ES:

$$\rho(X) = \sum_{i=1}^m a_i \text{ES}_p(X|S_i), \quad X \in \mathcal{L}_{[0,1]},$$

- ▶ Max ES:

$$\rho(X) = \frac{1}{1-p} \int_p^1 \left( \bigvee_{i=1}^n \text{VaR}_q(X|S_i) \right) dq, \quad X \in \mathcal{L}_{[0,1]}.$$

- ▶ Examples in [W.-Ziegel'18](#)



# Our contributions

## Our contributions

- ▶ rigorously formulate the phenomenon of **tranche exploitation**; PD leads to tranche exploitation, whereas EL does not;
- ▶ introduce **self-consistent** rating criteria; EL is self-consistent, whereas PD is not;
- ▶ characterize all rating criteria satisfying two axioms of **self-consistency** and **scenario-relevance**;
- ▶ present a set of new examples for a sensible rating criteria.

# Thank you

# Thank you for your kind attention

This paper is not yet online; we plan to put it on SSRN in a month.  
Comments are welcome.