An Analysis of the Limitations of Utilizing the Development Method for Projecting Mortgage Credit Losses and Recommended Enhancements

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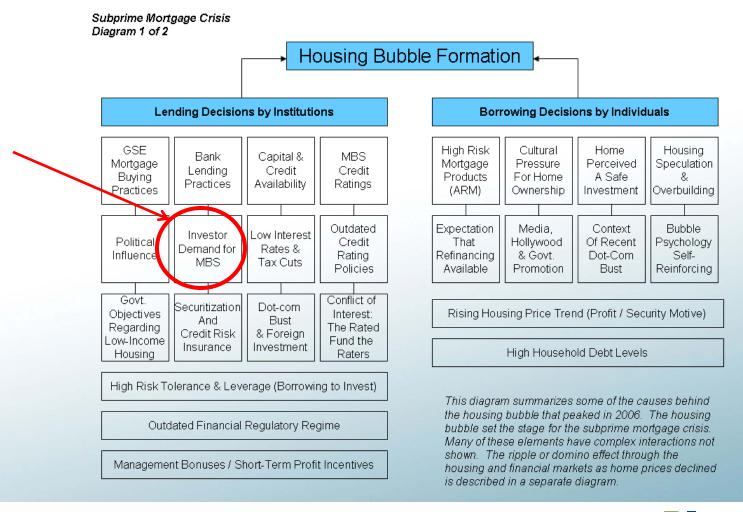


Agenda

- Background
- LDF Limitations
- Recommended General Enhancements
- Closing
- References

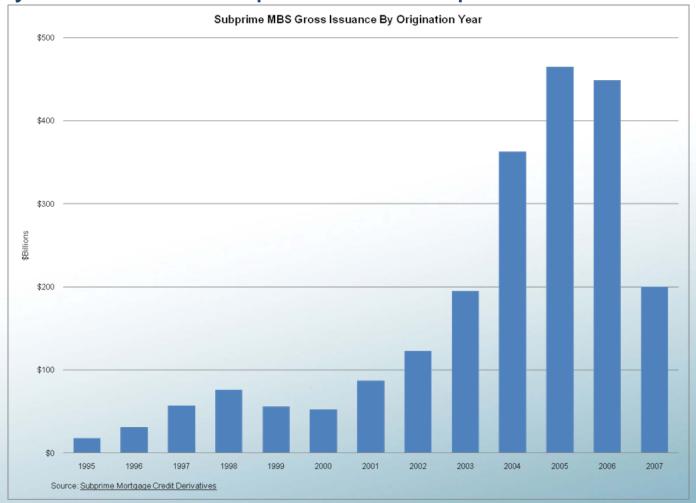


MBS investor demand fuels housing bubble



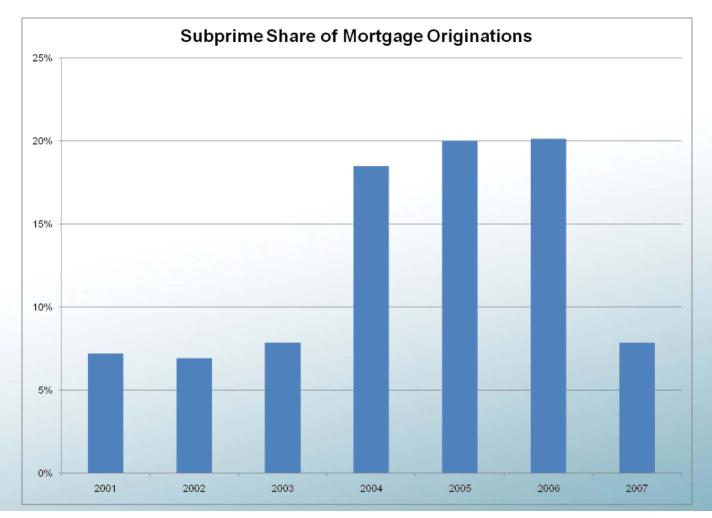


Early/mid-2000s-Subprime MBS expands





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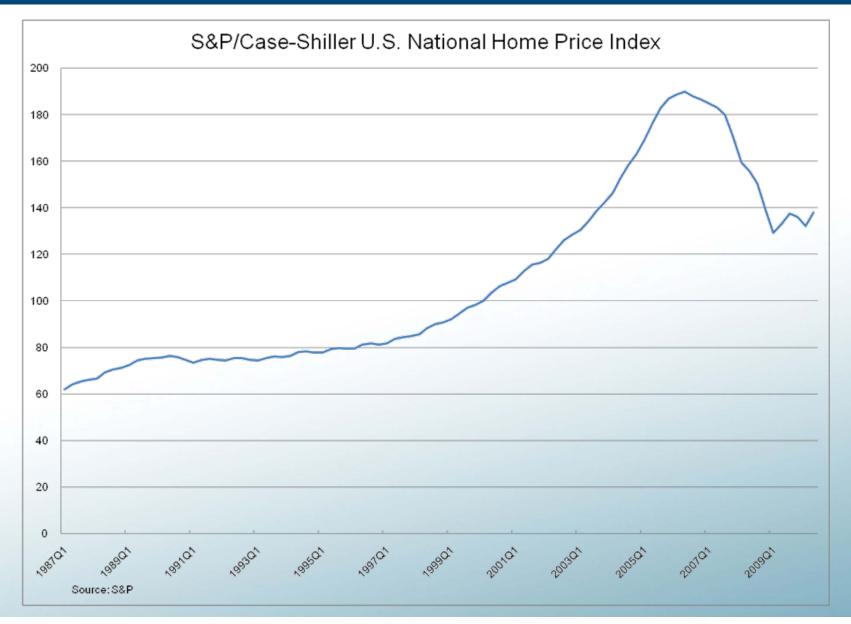




Seemingly dependable collateral

Subprime Mortgage Crisis Diagram 1 of 2 Housing Bubble Formation Lending Decisions by Institutions Borrowing Decisions by Individuals GSE High Risk Cultural Home Housing Bank Capital & MBS Mortgage Mortgage Pressure Perceived Speculation Lending Credit Credit Buying Products For Home A Safe Practices Availability Ratings Practices (ARM) Ownership Investment Overbuilding Outdated Bubble Expectation Media. Context Investor Low Interest Political Of Recent Psychology Credit That Hollywood Demand for Rates & Influence Rating Refinancing & Govt. Dot-Com Self-MBS. Tax Cuts Available Policies Promotion Reinforcing Govt. Conflict of Securitization Dot-com Rising Housing Price Trend (Profit / Security Motive) Objectives Interest: And Bust Regarding The Rated Credit Risk & Foreign Low-Income Fund the Insurance Investment High Household Debt Levels Housing Raters High Risk Tolerance & Leverage (Borrowing to Invest) This diagram summarizes some of the causes behind the housing bubble that peaked in 2006. The housing Outdated Financial Regulatory Regime bubble set the stage for the subprime mortgage crisis. Many of these elements have complex interactions not shown. The ripple or domino effect through the Management Bonuses / Short-Term Profit Incentives housing and financial markets as home prices declined is described in a separate diagram.







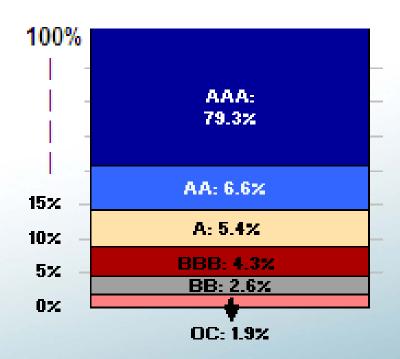
Subprime MBS rated by credit rating agencies

Subprime Mortgage Crisis Diagram 1 of 2 Housing Bubble Formation Lending Decisions by Institutions Borrowing Decisions by Individuals **GSE** High Risk Cultural. Home Housing Bank Capital & MBS Mortgage Mortgage Pressure Perceived Speculation Lending Credit Credit Buying Products For Home A Safe Practices Availability Ratings Practices (ARM) Ownership Investment Overbuilding Expectation Bubble Outdated Media. Context Low Interest Investor Political Hollywood Credit That Of Recent Psychology: Demand for Rates & Influence Rating Refinancina & Govt. Dot-Com Self-MBS Tax Cuts Policies: Available Promotion Bust Reinforcing Govt. Conflict of Securitization Dot-com Rising Housing Price Trend (Profit / Security Motive) Objectives Interest: Bust And Regarding The Rated Credit Risk & Foreign Low-Income Fund the Insurance Investment High Household Debt Levels Housing Raters High Risk Tolerance & Leverage (Borrowing to Invest) This diagram summarizes some of the causes behind the housing bubble that peaked in 2006. The housing Outdated Financial Regulatory Regime bubble set the stage for the subprime mortgage crisis. Many of these elements have complex interactions not shown. The ripple or domino effect through the Management Bonuses / Short-Term Profit Incentives housing and financial markets as home prices declined is described in a separate diagram.



Subprime MBS capital structure~80% AAA

Average Subprime MBS Capital Structure*





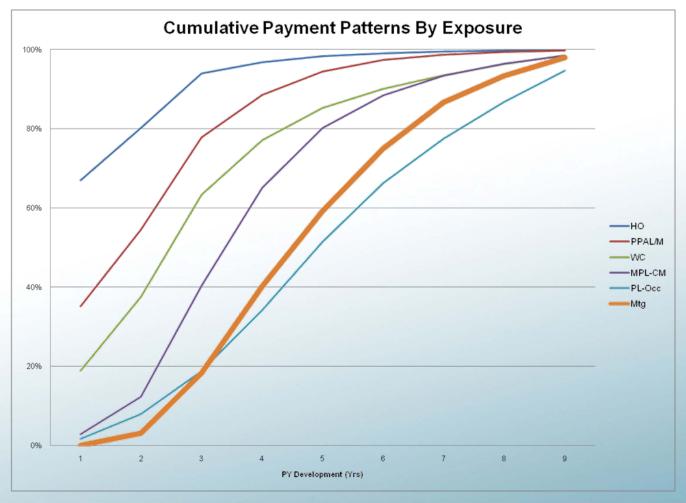
- Investor reliance on credit rating agencies
 - Not intention of rating agencies
 - Rather, they provide opinions on "the risk to the debtholder of not receiving timely payment of principal and interest" on specific debt securities
- NAIC uses credit opinions for policy formulation
 - "Insurers need not file any NRSRO rated securities with the SVO and instead self assign an NAIC designation to the security in accordance with a prescribed equivalency formula"
 - Life/Health insurers owned \$145B non-agency MBS at year-end 2008



- Independent analysis of MBS valuable (though scarce)
 - Broker-dealer quotes
 - Trading partner or third-party evaluator
 - Market value vs. intrinsic value
 - "Bond Powerhouse Has Many Hats"
 - PIMCO Advisory hired by NAIC to value insurers' RMBS for year-end 2009 statutory reporting and RBC requirements
 - Unit of PIMCO, managing MBS bond fund PTRIX
 - Unit of Allianz, insurance conglomerate ~\$10B R/CMBS



Mortgage credit losses are relatively long-tail



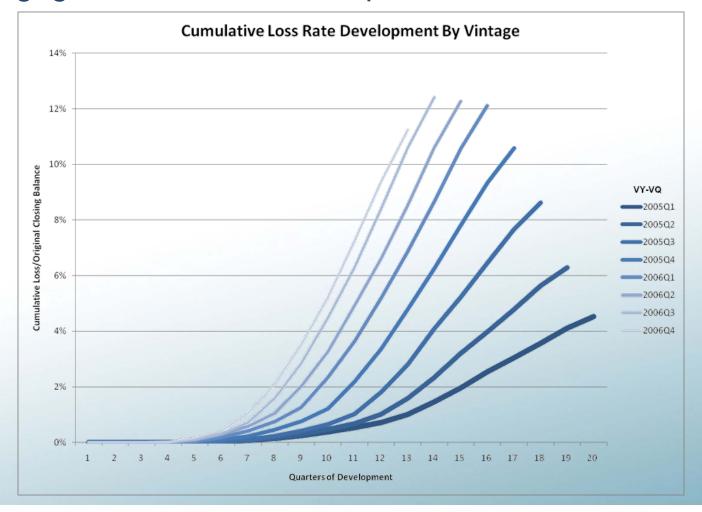


Mortgage credit losses are relatively long-tail

	Years			
Exposure	<u>Mean</u>	<u>Median</u>		
НО	1	<1		
PPAL/M	2	1-2		
WC	3	2-3		
MPL-CM	4	3-4		
PL-Occ	5	4-5		
Mtg	5	4-5		



Mortgage credit losses susceptible to CY effects





- Mortgage credit losses susceptible to CY effects
 - Economic conditions
 - Government intervention
 - Making Home Affordable
 - HAMP
 - HARP
 - Second Lien Modification Program
 - Foreclosure moratorium
 - First-Time Homebuyer Credit
 - Long-Time Resident Credit
 - Principal Forgiveness
 - Foreclosure crisis



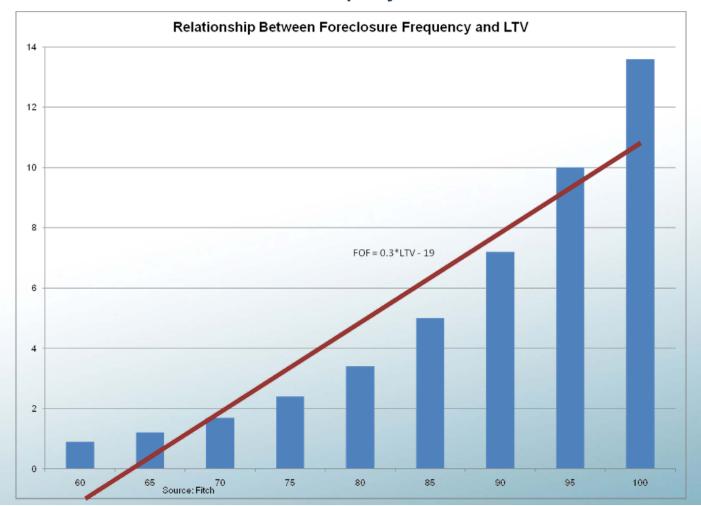
Heterogeneous risk profiles

	Collateral Characteristics Of Subprime ARMs							
		<u>%</u>	<u>%</u>	<u>%</u>	<u>% CLTV ></u>	<u>% CLTV ></u>	% Full	
<u>OY</u>	<u>CLTV</u>	<u>10</u>	<u>40 Yr</u>	<u>Piggyback</u>	<u>80%</u>	<u>90%</u>	<u>Doc</u>	
2001	81	0	0	4	45	25	71	
2002	81	1	0	4	47	27	66	
2003	84	6	0	11	56	38	63	
2004	85	21	0	20	61	45	59	
2005	87	33	8	29	64	51	55	
2006	88	20	31	34	69	56	53	
2007	85	19	28	20	64	49	57	

Source: Subprime Mortgage Credit Derivatives



Foreclosure and borrower equity non-linear relationship





- Key considerations
 - Underwriting characteristics
 - Economic conditions
- Other actuarial approaches to consider
 - Berquist-Sherman/Barnett-Zehnwirth
 - Bornhuetter-Ferguson
 - More appropriate where development is volatile and/or immature
 - Critical considerations for a priori
 - Underwriting characteristics (FICO, LTV, documentation, I/O, etc.)
 - Economic factors
 - Both paid and "incurred"
 - Persistency
 - Review data at granular level



Sample A Priori Loan-Level Data

<pre></pre>									
Stratify By Non			T 2005-550	:B				Loan	Details
Group: ALTA/G2	· · <u> </u>								f: 01/09
	ount Curr. An	nt (USD) %	WALTV	Score	e Orig	. Amt	WAC	WAM	WALA
All Loans		0.439.202 100.	0 72.9	7	_	782,299	5.9	2 319	41
Loan No.	Curr. Amt 1	Orig. Amt	Rate	LTV	Score	Age	MTM	Туре	Index 🔓
112433167	672,937	672,937	6.25	75.0	789	40	320	FIXED	N
104392510	505,000	505,000	5.50	73.2	743	40	320	FIXED	N
104194625	428,000	428,000	6.50	80.0	667	40	320	FIXED	N
111604698	407,368	408,000	5.38	80.0	775	40	320	FIXED	N
103964586	360,000	360,000	6.63	80.0	635	40	320	FIXED	N
60605445	359,650	359,650	5.75	76.7	693	41	319	FIXED	N
104575973	359,650	359,650	6.13	79.9	693	40	320	FIXED	N
104222813	359,650	359,650	5.88	48.0	648	41	319	FIXED	N
104040612	359,650	359,650	5.88	67.9	774	40	320	FIXED	N
104291885	359,649	359,650	5.88	48.5	772	40	320	FIXED	N
104355866	359,640	359,650	5.88	55.3	601	40	320	FIXED	N
104402448	359,638	359,650	6.25	72.7	776	40	320	FIXED	N
60609838	359,600	359,600	5.88	63.7	631	40	320	FIXED	N
44054021	359,575	359,650	6.00	77.0	734	41	319	FIXED	N
103671790	359,573	359,650	5.50	48.0	779	41	319	FIXED	N
103992502	359,522	359,650	5.63	67.2	718	41	319	FIXED	N
103797397	359,378	359,600	5.88	75.8	710	41	319	FIXED	<u> </u>
Australia 61 2 977 Japan 81 3 3201 89	7 8600 Brazil 551 00 Singapore	1 3048 4500 Europ 65 6212 1000	oe 44 20 733 U.S. 1 21	0 7500 Ge 2 318 200	rmany 49 69 O Copi			Kong 852 2 omberg Fina 2-Feb-2009	



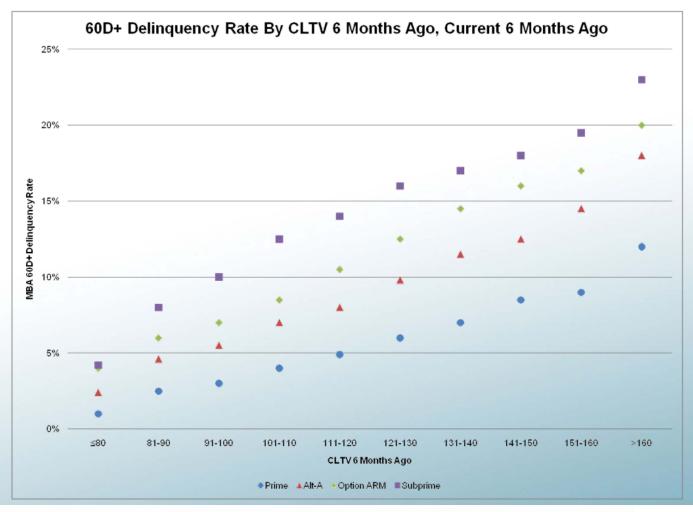
Underwriting characteristics spider chart

Illustrative Loan Characteristics

Amortization Loan Size FICO-LTV ---- Prime Alt-A Subprime Documentation Interest Only Loan Purpose Occupancy

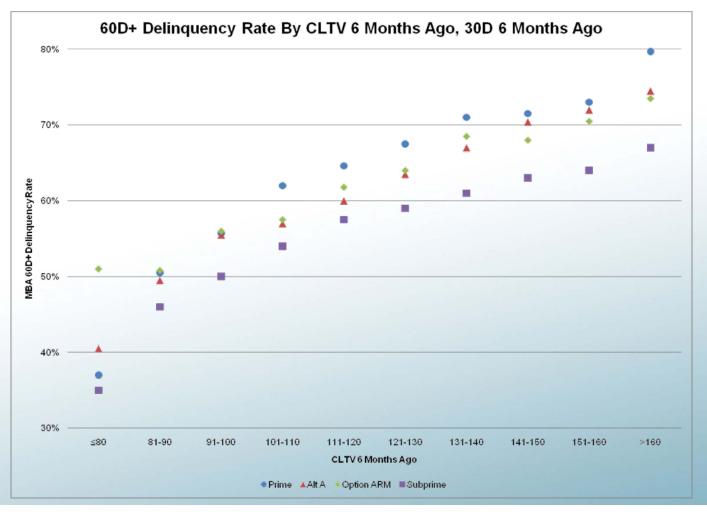


Econometric models





Econometric models

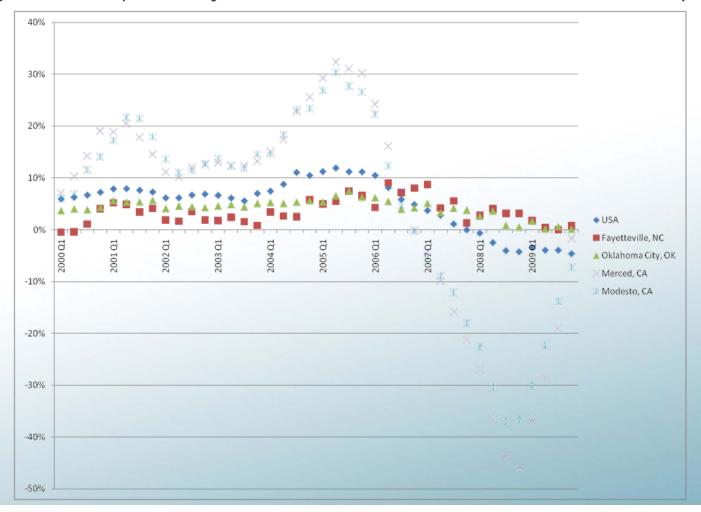




- A priori persistency adjustment
 - Actual persistency
 - A priori persistency
 - Adjustment needed to allow for more/less defaults based on actual vs. anticipated exposure duration
 - Adjust a priori ultimate by persistency factor

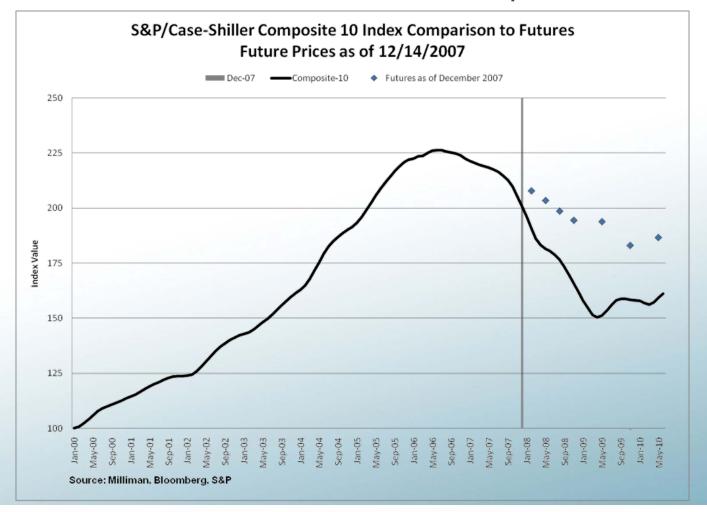


Be granular (know your basis: FHFA vs Case-Shiller)



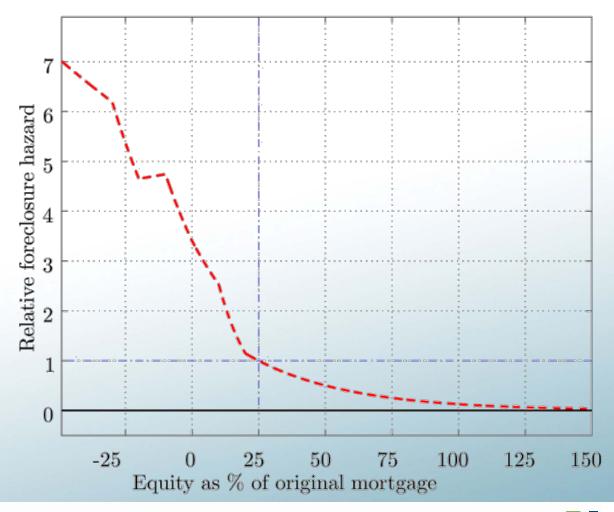


S&P/Case Shiller: Actual and Futures Implied

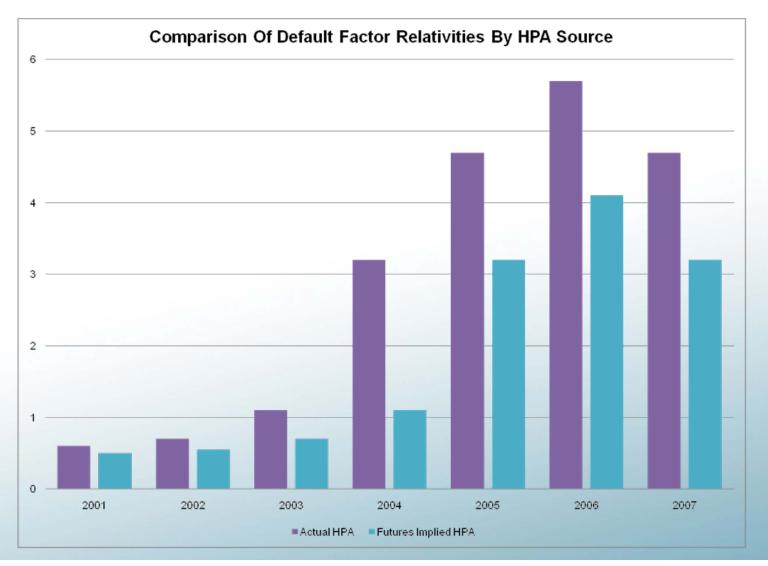




Estimated Effect of Equity on Default









Closing

- Actuarial talent is valuable in mortgage analysis
- Value independence and transparency
- Consider enhancements beyond LDF
- Critical considerations: underwriting attributes and economics
- Develop assumptions at granular level
- Don't overlook tail risk



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