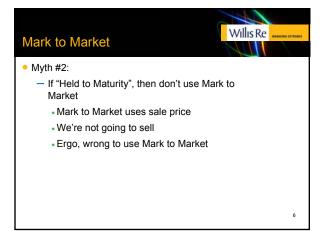




Mark to Market Myth #1: Mark to Market violates premise of "going concern" "Thus it appears that Fair value/mark-to-market is liquidation accounting imposed on going concerns." CAS Request for Proposals: Putting Mark to Market on a Going Concern Basis: http://www.casact.org/members/index.cfm?fa=viewArticlesup=963



Mark to Market • What's wrong with these 2 myths? - They overlook a foundational concept: • Imputation

Imputation To impute value = to assign value When using Mark to Market, we're using imputation The firm has no plans to sell assets or liabilities Other firms have been buying and selling We can observe the sale prices of these assets and liabilities Thus we can use the market prices to assign or "impute" value to the firm's assets and liabilities, even though the firm has no plans to sell

Mark to Market Summary Resist temptation to disqualify Mark to Market for Going concern Held to maturity Some of the accusations against Mark to Market are misguided Mark to Market is a valid basis of valuation



Efficient Markets Hypothesis - All public data is baked into market prices - Market price is inherently correct at all times Implies: always use market price as exclusive basis for valuation

Problem (via Professor Shiller): We know there are bubbles and panics Conclusions: Can't say that market price is inherently correct Can't say that market price is exclusive basis of valuation

No Arbitrage Pricing "No arbitrage" is another reason that market price is important If you tried to buy/sell at prices different than market, arbitrageurs would force prices back In other words: Can't / don't sell at less than market price Can't / don't buy at more than market price

No Arbitrage Pricing

Willis Re

- Doesn't say that market prices are "inherently correct"
- If you're going to sell something, market price is the reality of what you'd get
 - Then market price should be the <u>only</u> basis for valuation
- But what if you're not selling?
 - Concept of imputation means that market price is still <u>valid</u>
 - But not necessarily exclusive basis of valuation



Market Price	Willis Re MANGARE ETTERNES
Market Price	
 Valid? Yes. Perfectly accurate? Not alw 	ays
— Drawbacks:	
 Excess volatility relative to new inform 	nation
 Bubbles and panics 	
 Non-experts can affect market price 	
 Not stable, not robust across time 	
 Market price reflects current situation 	
 Often not good predictor of likely future pri 	ices
	18

Appraisal Value

Willis Re ...

- What is Appraisal Value?
 - The value of the estimated sale price
 - From a knowledgeable, non-distressed seller
 - To a knowledgeable, non-euphoric buyer
 - As estimated by independent experts

19

Market Price vs. Appraisal Value



Valuation Basis	Market Price	Appraisal Value
Who	Many buyers and sellers	Handful of individuals
Qualifications	Includes non-experts	Experts only
Data	Can derive from buyers/sellers with opaque information	Requires access to rich underlying data
Transactions	Reflects current environment, even distressed sales	Reflects neutral environment of non-distress, non-euphoria

20

Market Price vs. Appraisal Value



Situation	Which performs better?
Periods of Euphoria and Panic	Appraisal value
Opaque Assets	Appraisal value
Opaque Conglomerates	Appraisal value
Most Other Situations	Market Price

Market Price vs. Appraisal Value

Willis Re

- Market price has strengths and weaknesses
- Appraisal value has strengths and weaknesses
- Each method's strengths tend to arise in <u>different</u> situations
- Suggests utility of proposing...

22

Proposal



• Always record <u>both</u> market price and appraisal value:

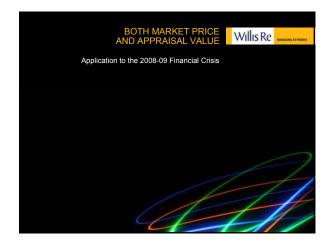
	Market Price	Appraisal Value		Market Price	Appraisal Value
Assets			Liabilities		
			Equity		

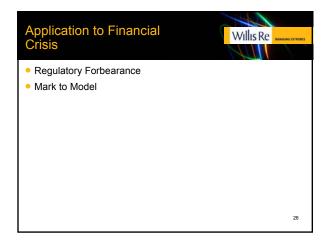
23

Proposal



- Recording <u>both</u> market price and appraisal value would help one analyze:
 - What is the spread between market and appraisal?
 - How does this spread change over time?
 - How does this spread differ by type of asset and liability?





Regulatory Forbearance	Willis Re WAAGABA EXTREMES
During crisis, market prices plummeted	
 Lower asset prices → lower recorded ca 	apital
 Leads to concern about required capital 	
 Leads to asset sales 	
Causes "price-to-price feedback loop"	
 Regulators should have <u>pre-committed</u> to u appraisal value for satisfying required capita 	•
Fed "stress tests" = appraisal value	
	27

Mark to Model



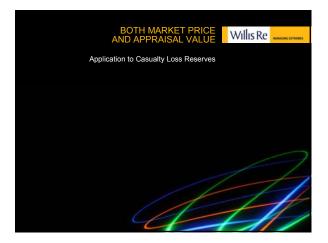
- Firms declared "no active market, no market prices, switching to mark to model".
- Investors extremely suspicious of mark to model
 - Firms abandon market prices when they go down, but not up
 - Company financials have weird mixture, some assets are recorded at market, some at model
 - Using mark to model →less transparency for investors about true market prices.

28

Mark to Model



- In contrast, if firms would <u>always</u> publish <u>both</u> market price and appraisal value, then:
 - There's no self serving "switch" from market to model (appraisal)
 - Publishing appraisal value doesn't obstruct the view of market price
 - Investors less panicked that firm is hiding something
 - All information completely transparent



Loss Reserves: Appraisal Value

Willis Re

- Do loss reserves satisfy the requirements of appraisal value?
 - Do they measure the value of the estimated sale price between a knowledgeable seller and buyer?
 - No!
 - -Buyers and sellers require prices to reflect
 - Time value of money
 - Risk load

31

Loss Reserves: Appraisal Value



- Do loss reserves satisfy the requirements of appraisal value?
 - Do they reflect the value of the estimated sale price...
 - · As measured by experts?
 - -Yes!
 - -Related: should recorded value reflect actuary's estimate or management's estimate?
 - As measured by <u>independent</u> experts?
 - -Discuss

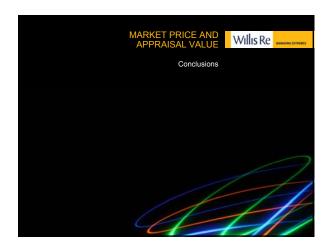
32

Loss Reserves: Market Price

Willis Re

- Solvency II capital regime:
 - Use one year downside in <u>market price</u> for required capital
- Market price ≠ appraisal value
- Many actuarial methods for reserve risk use appraisal value rather than market price
 - Appraisal value \rightarrow requires multiyear runoff
 - One year horizon → requires market price
 - One year + variability of appraisal value = wrong

Loss R	eserves	: Paradigms	Willis Re MANAGEMENT
Paradigm	Time Horizon	Assumes that After One Year of Downside	Measures Variability of
Appraisal Value	Multiyear runoff	The firm can rely on preexisting held capital to weather further downside risk	How the market price ought to behave
Market Price	One year	The firm can sell its liabilities or can raise equity capital	How the market price <u>actually</u> (mis)behaves



Conclusions	CINC EXTREMES
 Proposal: always record both market price and appraisal value 	
 Each valuation basis complements the other 	
 Don't conflate the two; each must remain internally consistent 	
 Recording both appraisal and market 	
 Would have reduced the panic during the financial crisis 	
 Would have identified ex-ante the increased risk of a real estate bubble 	
 Would be beneficial for casualty loss reserves 	
	36



