Alternative Reference Rates Committee (ARRC) Minutes for the June 18, 2018 Meeting

- 1. Federal Reserve staff summarized discussions of the Paced Transition working group around different approaches to calculating price alignment interest (PAI) and discounting for cleared SOFR products. Federal Reserve staff noted that while working group participants expressed varying demand for using SOFR PAI and discounting on cleared SOFR products, either approach would be workable within the parameters set by the Paced Transition Plan and that central counterparties would appropriately make their own business decisions about which approach best meets the demands of their customers. LCH and CME discussed feedback they had received from their respective market outreach efforts on this topic and their operational capability to accommodate the approaches they were considering. LCH noted that it would soon begin clearing SOFR-linked products in the prevailing federal funds PAI and discounting environment. Subsequent to the meeting, CME announced that it would offer clearing of SOFR products using SOFR PAI and discounting. The ARRC Chair noted that the ARRC was already ahead of the timeline laid out in the Paced Transition Plan and that the ARRC should continue to seek ways to move more quickly than envisioned in the Plan, provided that such steps did not introduce operational risks.
- 2. ARRC members discussed a draft of a letter to regulators in the U.S. that was drafted by the Regulatory Issues working group in order to highlight issues related to Title VII of the Dodd Frank Act that could arise when existing derivative contracts are amended to include new fallback rates or references to alternative benchmark rates. The co-Chairs of the Regulatory Issues working group summarized the main topics of the letter and requested that ARRC members provide feedback before the letter is sent to regulators. The ARRC Chair noted that the purpose of the letter is to make policymakers aware of regulations that require guidance or clarification to support adoption of alternative reference rates. The <u>regulatory letter</u> was released subsequent to the meeting.
- 3. The co-Chairs of the Outreach and Communications working group highlighted the need to more effectively inform the public about the ARRC's work and noted that the working group was drafting a press release to accompany the publication of the guiding principles for the development of fallback language for new financial contracts for cash products. The press release and guiding principles were subsequently released.
- 4. ARRC members discussed potential changes to contract language that could account for "zombie" USD LIBOR, a scenario in which LIBOR continues to be published but with fewer submitters. A number of ARRC and working group members expressed concern that in this scenario, they might be forced to continue to reference USD LIBOR in legacy contracts even if its quality was degraded and there was a widespread consensus that USD LIBOR was no longer appropriate for use. The ARRC Chair suggested that the ARRC should aim to recommend workable language that could be voluntarily adopted into financial contracts to address such a

scenario in a comprehensive way. Several members noted the importance of consistency across cash product types, both in considering the events that would trigger a move from USD LIBOR in contract language and in the selection of a successor rate. Chairs of the various cash products working groups briefly summarized discussions that took place within their working groups about potential contract language, discussing the benefits and drawbacks of "hardwired" fallbacks versus more flexible or hybrid approaches to fallback language. It was agreed that more work needed to be done on the various approaches to fallback language.

- 5. The Chair requested that ARRC members provide feedback on whether the Committee should recommend a term rate. The ARRC agreed that it would recommend specific term rates if those rates meet ARRC defined guidelines and are also consistent with IOSCO benchmark principles.
- 6. Federal Reserve staff reminded the ARRC that a <u>public roundtable</u> is scheduled to take place on July 19, 2018.
- 7. The next ARRC meeting is scheduled to take place on July 24, 2018, from 3:00-5:00 PM.

Attendance at the June 18, 2018 Meeting

ARRC Members

AXA Bank of America Bank of America BlackRock Citigroup CME CME **Deutsche Bank Deutsche Bank** Fannie Mae Freddie Mac **Goldman Sachs** Goldman Sachs **Government Finance Officers Association Government Finance Officers Association** HSBC Intercontinental Exchange International Swaps and Derivatives Association JP Morgan LCH Met Life Met Life Met Life Morgan Stanley Morgan Stanley National Association of Corporate Treasurers Pacific Investment Management Company **TD Bank** The Federal Home Loan Banks, through FHLBNY The Independent Community Bankers of America The Independent Community Bankers of America The Loan Syndications and Trading Association The Securities Industry and Financial Markets Association The Securities Industry and Financial Markets Association Wells Fargo World Bank Group

Charles Schwartz Alex van Voorhees **Paul Scurfield** Jack Hattem* **Dina Faenson** Agha Mirza Fred Sturm Adam Eames Vishal Mahadkar **Nadine Bates** Ameez Nanjee Alexander Blanchard* Scott Rofey* Pat McCoy **Emily Brock** Shirley Hapangama Chris Edmonds Ann Battle Sandie O'Connor Alice Wang Perry Elbadrawi Andrew Gray **Emilio Jimenez Terry Belton*** David Beck* Phil Whitehurst* Jason Manske Kevin Budd* Alex Strickler* Priya Bindra Maria Douvas-Orme Tom Deas Courtney Garcia* **Paul Beltrame** Phil Scott Chris Cole* James Kendrick* Meredith Coffey Randy Snook Chris Killian* **Brian Grabenstein Dolores Lopez-Larroy***

Attendance at the June 18, 2018 Meeting

Ex-Officio ARRC Members

Commodity Futures Trading Commission Consumer Financial Protection Bureau Federal Deposit Insurance Corporation Federal Housing Finance Agency Federal Reserve Bank of New York Federal Reserve Board of Governors Office of Financial Research Office of the Comptroller of the Currency U.S. Securities and Exchange Commission U.S. Treasury U.S. Treasury

Observers

American Bankers Association Bank of Canada BNP Paribas CRE Finance Council Morgan Lewis Structured Finance Industry Group

*Indicates participation by telephone

Sayee Srinivasan* Abhishek Agarwal Irina Leonova* Dan Coates Matt Lieber Josh Frost **Ray Check** William Riordan* Caren Cox Justine Hansen Adhiraj Dutt David Bowman Chiara Scotti Joshua Louria Laura Macedo* Evan Winerman* Matt McCormick Michael Killick* David Metzman Chloe Cabot **Brian Smith***

Barry Mills Sheryl King Simon Winn Lisa Pendergast Jon Roellke* Richard Johns*