1. The co-Chairs of the Legal Working Group updated the ARRC on the Working Group’s efforts exploring potential legislative solutions to address issues that could arise with legacy U.S. dollar (USD) LIBOR-linked instruments in the event of LIBOR disruption. Representatives from Cadwalader provided an overview describing how such solutions might work, including examples of how they could apply in certain scenarios. ARRC members discussed the different scenarios, and agreed to each consider the issues in further depth internally within their institutions in preparation for continued discussion at the next ARRC meeting. The ARRC Chair noted that the legislative work was preliminary at this time and that no decision would be made about whether to move forward with such efforts until further information could be gathered about their potential effectiveness.

2. ARRC members discussed and approved the Consultation on Fallback Contract Language for Adjustable-Rate Mortgages (ARMs) and the white paper on Options for Using SOFR in ARMs that were developed by the Consumer Products Working Group. The Consultation requests feedback by September 10, 2019 on a proposal for improved fallback language for new ARM contracts that reference USD LIBOR while the white paper illustrates how an average of the Secured Overnight Financing Rate (SOFR) can be used in newly issued ARMs in a structure that is generally comparable to today’s existing ARMs. The materials were subsequently released along with the Guiding Principles for the development of fallback contract language for consumer products that was approved at the May ARRC meeting.

3. A member of the Outreach/Communications Working Group presented a draft checklist for SOFR adoption that the Working Group developed in order to help market participants better understand organizational steps they could take to help prepare for the potential disruption of LIBOR. The ARRC Chair requested that members provide the Secretariat with feedback on the checklist. The co-Chairs of the Working Group briefly discussed ideas to strengthen certain aspects of the Working Group’s organizational structure.

4. Federal Reserve staff provided an overview of the SOFR data contingency methodology, noting that the contingency methodology, which is available on the Federal Reserve Bank of New York’s website, has been in place since SOFR production began. The data contingency methodology is designed to ensure the timely production of SOFR and the Federal Reserve Bank of New York’s other Treasury repo reference rates in the event that primary source data are unavailable, as was the case on June 3, 2019.

5. A member of the Floating Rate Notes Working Group presented materials developed by the Working Group outlining further details of the various conventions used in recent FRN issuances based on SOFR that the Working Group believed would be helpful for market participants to consider when using SOFR in new FRN issuances. The ARRC approved the idea of releasing the document, subject to further revision and final review.
Attendance at the June 26, 2019 Meeting

ARRC Members
American Bankers Association                Hu Benton
AXA                                         Julien Zusslin
Bank of America                             Alex van Voorhees
BlackRock                                   Alex Krol
Citigroup                                   Dina Faenson
Citigroup                                   Jeannine Hyman
CME                                         Agha Mirza
CME                                         Fred Sturm
CRE Finance Council                         Lisa Pendergast
CRE Finance Council                         Raj Aidasani
Deutsche Bank                               Adam Eames
Deutsche Bank                               Vishal Mahadkar
Fannie Mae                                  Nadine Bates
Fannie Mae                                  Sheila Teimourian*
Federal Home Loan Banks, through FHLBNY     Reggie O’Shields
Freddie Mac                                 Ameez Nanjee
GE Capital                                  Michael Taets
Goldman Sachs                               Gigi Chavez de Arnavat
Goldman Sachs                               Jason Granet
Goldman Sachs                               Richard Chambers
Government Finance Officers Association      Emily Brock*
Government Finance Officers Association      Pat McCoy
HSBC                                        Shirley Hapangama
Independent Community Bankers of America    James Kendrick*
Intercontinental Exchange                   Harvey Flax
International Swaps and Derivatives         Ann Battle
JP Morgan                                    Alice Wang
JP Morgan                                    Andrew Gray
JP Morgan                                    Emilio Jimenez
JP Morgan                                    John Horner
JP Morgan                                    Katie Morgan*
JP Morgan                                    Keith Stephan
JP Morgan                                    Perry Elbadrawi*
JP Morgan                                    Terry Belton*
LCH                                         Phil Whitehurst*
Loan Syndications and Trading Association   Meredith Coffey
Loan Syndications and Trading Association   Tess Virmani*
MetLife                                      Alex Strickler*
MetLife                                      Kevin Budd*
Morgan Stanley                               Maria Douvas-Orme
Morgan Stanley                               Tom Wipf
Morgan Stanley                               Tom Deas
National Association of Corporate Treasurers Tom Deas
Pacific Investment Management Company       Courtney Garcia*
Pacific Investment Management Company
Prudential Financial
Securities Industry and Financial Markets Association
Securities Industry and Financial Markets Association
Structured Finance Association
TD Bank
Wells Fargo
Wells Fargo
Wells Fargo
World Bank Group

Ex-Officio ARRC Members
Commodity Futures Trading Commission
Consumer Financial Protection Bureau
Federal Housing Finance Agency
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Office of Financial Research
Office of the Comptroller of the Currency
U.S. Securities and Exchange Commission
U.S. Securities and Exchange Commission
U.S. Treasury
U.S. Treasury

Observers
Bank of Canada

Scott Goodman
Tracey Jordal*
Chris McAlister
Gary Horbacz
Chris Killian
Rob Toomey*
Sairah Burki*
Greg Moore
Alexis Pederson
Brian Grabenstein
Susan Hughes
Don Sinclair*
Sayee Srinivasan*
Abhishek Agarwal
Dan Coates
Adhiraj Dutt
Alec Mitchell
Betsy Bourassa
Cam Fuller
Caren Cox
Jamie Pfeifer
Joshua Jones
Justine Hansen
Matt Lieber
Nathaniel Wuerffel
Ray Check
Sarah Bailey
Scott Sherman
William Riordan
Chiara Scotti*
Darren Gersh*
David Bowman
Erik Heitfield*
Evan Winerman*
Matt McCormick
Ang Middleton
David Metzman*
Michelle Danis*
Chloe Cabot
Peter Phelan
Sheryl King
BNP Paribas
Cadwalader
Cadwalader
Morgan Lewis
Oliver Wyman
Venerable

Simon Winn
Jonathan Hoff
Lary Stromfeld
Jon Roellke
Adam Schneider
Charles Schwartz

*Indicates participation by telephone