

# **Minutes of the Foreign Exchange Committee**

Meeting, May 10, 2012

Host: Bank of America Merrill Lynch

<u>Joint Meeting FXC Attendees</u>

Daniel Gleizer Banco Itau BBA

Tom Gillie Bank of America Merrill Lynch

Robert Bogucki Barclays
Jeff Feig Citigroup

Robert Catalanello Credit Agricole CIB Zar Amrolia Deutsche Bank AG

Phil Weisberg FXall

Troy Rohrbaugh JP Morgan Chase

David Steck Nomura
Tim Carrington RBS

Anthony Bisegna State Street Corporation

Gil Mandelzis Traiana
Paul Richards UBS

<u>Joint Meeting OMWG Attendees</u>

Robin Perlen Bank of America Merrill Lynch Keri Peacock Bank of America Merrill Lynch

Joe DemetrioBNY MellonJoanne BrowerBarclays Capital

Kenneth Rozycki Brown Brothers Harriman

Murali EnamandramCitigroupRaphael DemaizieresCredit AgricoleMichael MulhollandCredit SuisseStephen DobsonDeutsche Bank

Daniel Ruperto Goldman Sachs & Co.

Deborah Cunningham HSBC Andy Bria ICAP Jason Conn ICAP

Robert Eby Morgan Stanley
Denise Sommerville Morgan Stanley
Mike Hanlon Standard Chartered

Nancy Riyad UBS Patrick Stutz UBS

Federal Reserve Attendees

Patricia Mosser Brian Sack Michael Nelson, Counsel Geza Sardi

Anna Nordstrom Shawei Wang, Counsel

Jamie Pfeifer



### Welcome

The FXC Chair welcomed the members of the Operations Managers Working Group (OMWG) to the meeting and thanked the group for all of its contributions.

#### **OMWG Update**

Daniel Ruperto, Chair of the OMWG, provided an update on the various work efforts underway by the OMWG as well as an update on the status of the initiatives related to the <u>commitments being</u> <u>made to the global supervisory community</u>. Work streams cited included the ongoing review of the Management of Operational Risk in Foreign Exchange document, outreach to the Buy Side to improve operational efficiencies and promote greater straight-through-processing, and work to expand the set of data related to confirmations beyond the G14 banks. He also provided an update on efforts related to the regulatory commitments, with a focus on the development of the foreign exchange standardization matrix under development.

In addition, the OMWG has designated members to be points of contact for the group on specific pertinent topics. These members are to keep the members abreast of developments related to these topics from an operational risk perspective and to work across the groups (including the FXC, Financial Market Lawyers Group, and the Chief Dealers Working Group) as appropriate. These topics include Dodd Frank implementation issues broadly, trade reporting, central clearing and prime brokerage, and electronic confirmations. In addition, particular members have been tasked with tracking developments by other related industry groups on related issues as well.

### **FXC Update**

The Secretary noted several efforts underway by the FXC. An FXC working group continues to develop a generic template to help in facilitating a more systematic analysis of the impact of any given risk scenario on the structure and function of the foreign exchange market. Another working group is considering the implications of a foreign exchange market that spans cleared and non-cleared transactions as well as multiple clearing frameworks. A third workgroup is preparing a revision of the paper released on algorithmic trading developments originally published by the FXC in 2006.

Various FXC members shared views on questions submitted by the operations managers.

- Members were asked about the potential impact of Basel III requirements on the FX market. Members generally suggested that the impact from Basel III was less pronounced in FX than in other asset markets because foreign exchange business makes less use of a firm's balance sheet, which may increase interest in the FX business and thus promote increased competition. That said, the additional modeling, pricing, and valuation needs were certain to require more resources. Some suggested that the new capital requirements might negatively impact customer hedging behavior as the costs associated with such activity would rise in line with increasing collateral requirements.
- Members were asked about the potential impact of mandated clearing on the NDF market.
   Members provided a broad update on the status of NDF clearing citing clearing efforts at various stages of implementation from SGX, LCH, CME, and ICE. Mixed views were expressed about the impact on the NDF market, with some suggesting that the increased



cost will force a decline in the business while others felt that the availability to clear NDFs would attract increased interest in the market, especially from those participants used to dealing in futures markets.

Members were asked about the potential impact of multiple clearing houses on the FX market. While some noted the importance of having multiple clearing offerings for contingency and competition purposes, others noted that it may be difficult for many firms to make the up-front investment required to connect to multiple clearers and thus many firms will not be able to support the clearing business, instead becoming customers of larger entities. In addition, members discussed the dimensions upon which the clearing offerings were likely to compete. Some suggested that there is a risk that clearinghouses may compete on initial margin terms, risking a race to the bottom scenario. Some members mentioned the challenges of inter-operability across clearing houses and the increased demand on collateral.

### **Market Discussion**

The FXC Chair facilitated a discussion on recent market developments. Members discussed a number of topics including those featured below.

Members discussed recent developments in Europe and expectations for the upcoming elections in Greece and the possible impact those elections could have on the potential for a Greek exit from the euro. Given these developments, members expressed some surprise at the recent resiliency of the euro versus other currencies. Various factors were cited as possibly stemming euro depreciation, such as offsetting developments out of core Europe, reserve diversification needs, and concerns in the U.S. related to weaker-than-expected economic data, fiscal challenges, and the upcoming Presidential election. Members also discussed developments in Brazil, highlighting recent signs of a significant shift toward more active central bank policy. Several members also noted general declines in trading volumes.

## **Other Business**

- The next OMWG meeting is scheduled to take place Tuesday June 26th at 3 PM and will be hosted by Morgan Stanley.
- The next FXC meeting is scheduled to take place on Wednesday June 27th at 4 PM and will be hosted by UBS.