

Short vol not fazed by the Fed

Expect selling vol to be profitable despite Fed hikes

Despite the sooner perceived timing of Fed hikes and the low levels of implied vol, selling gamma should continue to be a profitable trade, on average, in our view. In fact, the short gamma trade has delivered the highest returns during tightening cycles in the past. Although implieds are already close to historical lows, we expect the equilibrium level of vols to be below historical norms in the coming hiking cycle given the gradual and predictable nature of this cycle.

A hawkish surprise is the main risk to the trade

The main risk to the short gamma trade is a more hawkish transition to hikes, which could cause a selloff in rates and underperformance of the short gamma trade. However, in our view, any Fed surprise at this time is unlikely to cause a market reaction of the magnitude seen in past transitions to hikes.

Fed policy expectations predict future gamma returns

Investors can get clues to future gamma returns from expectations of Fed hikes measured by the front end of the curve. A steeper front end predicts higher returns on selling gamma, on average. From this point of view, the recent selloff in the front end predicts positive average returns on the short gamma trade in the next few months.

Rates Research | United States
29 July 2014

Bank of America
Merrill Lynch

Ruslan Bikbov
Rates Strategist
MLPF&S
ruslan.bikbov@baml.com

+1 646 855 9770

US Rates Research
MLPF&S

+1 646 855 8846

Short vol not fazed by the Fed

Selling gamma has been a highly successful trade this year. But selling vol at this time may seem questionable because we are now closer to the perceived start of Fed hikes, and implied vols already are close to historical lows.

In analyzing the performance of the short gamma trade in past Fed cycles, we find that the trade, in fact, delivered greater returns in tightening cycles. As a result, the trade should continue to deliver positive average returns in the coming hiking cycle, in our view. The main risk to the trade is a temporary spike in vols, which could occur during the transition to hikes if the Fed surprises the market on the hawkish side.

We also find that the short gamma trade tended to deliver greater returns when the market was pricing sooner and faster Fed hikes, likely because the magnitude of a potential hawkish surprise is smaller when investors already are focused on hikes. This indicates the short gamma trade is likely to continue to be profitable in the next few months.

The short gamma trade

In a typical short gamma trade, investors sell delta-hedged 1m10y straddles on a regular basis. This variation of the trade has been popular because it delivered attractive risk-adjusted returns. Table 1 compares average returns and Sharpe ratios for three types of short gamma trades on different underlying tails: selling delta-hedged straddles, unhedged straddles and unhedged strangles. For each trade, we assume the sale of 1m options on a weekly basis starting in mid 1994 when our vol data became available. Selling 1m10y delta-hedged straddles delivered the best Sharpe ratio among all the trades.

The reason selling gamma worked on average is the presence of volatility risk premium, i.e. extra compensation that sellers of options require to take the risk of large market moves (and therefore face a trade-off between average returns and infrequent large drawdowns). The fact that selling gamma on the 10y delivered greatest returns is likely due to mortgage-related demand for convexity and the fact that this sector of the curve is less prone to monetary policy shocks.

Table 1: Selling delta-hedged 1m10y straddles delivered attractive risk-adjusted returns

| Option | Delta-hedged straddles | | | Unhedged straddles | | | Unhedged 25D strangles | | |
|-----------------------------|------------------------|------|-------------|--------------------|------|-------|------------------------|------|-------|
| | 1m2y | 1m5y | 1m10y | 1m2y | 1m5y | 1m10y | 1m2y | 1m5y | 1m10y |
| Avg return on option, cents | -0.2 | 4.2 | 10.9 | 0.1 | 5.4 | 15.8 | -0.3 | 3.8 | 10.0 |
| Sharpe ratio | -0.06 | 0.56 | 0.86 | 0.01 | 0.30 | 0.49 | -0.06 | 0.27 | 0.39 |

Note: The table reports average returns and Sharpe ratios for three types of short gamma trades. The first trade reflects the sale of delta-hedged straddles. We delta-hedge (to neutral) if the delta of an option is equal or greater than 20% by absolute value. The second trade reflects the sale of unhedged straddles. The third trade reflects the sale of unhedged 25%-delta strangles. Each strategy reflects the sale of 1m options on a weekly basis that are held until expiration. We assumed 0.5bp bid-offer transaction cost for delta hedging. We also assumed bid-offer costs of 3, 4 and 8 cents for 1m2y, 1m5y and 1m10y straddles, respectively. Sample: 4/1994-6/2014.

Source: BofA Merrill Lynch Global Research

Table 2: Selling gamma worked best in hiking cycles

| Fed cycle | Avg return on short 1m10y, cents |
|-----------|----------------------------------|
| easing | 8.9 |
| on hold | 11.5 |
| hikes | 14.2 |

Note: The table reports average returns on a short 1m10y vol trade in different Fed cycles. We assumed the sale of 1m10y delta-hedge straddles on a weekly basis and held until expiration to compute returns on the trade. We identified hiking (easing) episodes by whether the Fed funds rate was increasing (decreasing) in those episodes. On-hold episodes are those where the Fed funds rate was unchanged. Sample: 4/1994-6/2014.

Source: BofA Merrill Lynch Global Research

Short gamma in Fed hiking cycles

Because the Fed expects to transition from a prolonged on-hold regime to rate hikes next year, investors may worry that the short gamma trade may underperform going forward. However, historically, the trade delivered greater average returns in hiking cycles than in episodes where the Fed was on hold, and significantly greater than in easing cycles. Average returns on selling delta-hedged 1m10y straddles were highest in tightening and lowest in easing Fed cycles (Table 2). We identified hiking (easing) episodes by whether the Fed funds rate was increasing (decreasing) in those episodes. On-hold episodes are those where the Fed funds rate was unchanged.

Table 3: The pace of employment increase exceeds the pace of decline

| Phase | Avg pace, %/year |
|----------------|------------------|
| Peak to trough | -0.6 |
| Trough to peak | 1.4 |

Sample: 1/1/1990-6/1/2014.

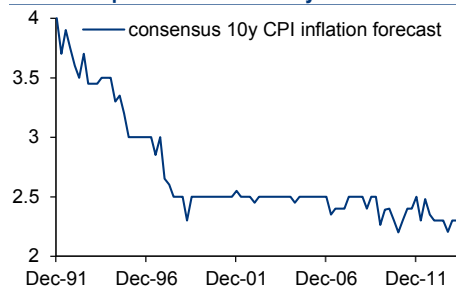
Source: BofA Merrill Lynch Global Research

The reason for this, in our view, is that hiking cycles characterize an economy in later stage recovery, which is inherently more predictable than recessions or early stage recovery. Recessions typically develop quickly, but subsequent recoveries are much slower, on average. This is evident, for example, from that fact that the unemployment rate tends to rise much faster relative to the pace of subsequent decline (Table 3). In addition, the Fed is typically more focused on inflation than growth during a hiking regime. Because inflation is more persistent than growth, normally the Fed can afford to raise rates at a relatively predictable pace. In contrast, the Fed is more focused on growth during easing and on-hold episodes.

What about 1994?

Our analysis of gamma returns may be somewhat biased because we excluded the initial stage of the 1994 hiking cycle when the Fed surprised the market by engineering aggressive hikes. Although we cannot quantify the performance of the short gamma trade in that episode for data availability reasons, an increase in realized volatility in the first few months after the first hike in January 1994 suggests that selling gamma most likely lost money in that period (Chart 2).

Chart 1: Improved Fed credibility



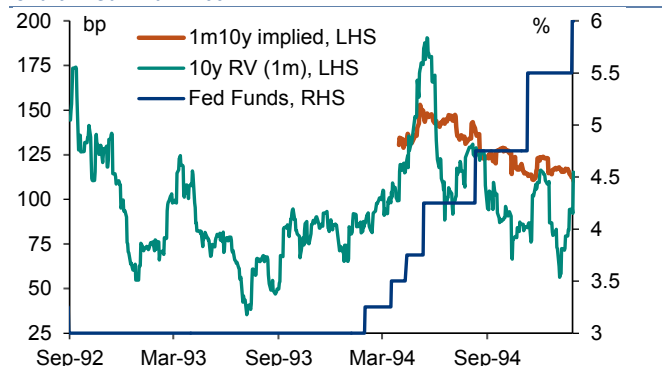
Source: Survey of Professional Forecasters, BofA Merrill Lynch Global Research

However, we do not think this 1994 experience is relevant for the coming hiking cycle. FOMC communication was [much less transparent in 1994](#), which likely contributed to the rise in vol during the transition period to hikes. More importantly, we believe the reaction function of the Fed to inflation shocks has changed since then due to structural changes in inflation dynamics.

The Fed saw policy tightening as a necessary measure to prevent the risk of a run-up in inflation given that some measures of excess capacity were approaching full capacity at that time, according to FOMC minutes from 1994. But the risk of high inflation is much lower this time. Longer-term inflation expectations have become well anchored (Chart 1). Also, numerous academic studies find that the Phillips curve has flattened in the recent years, so that inflation has become less sensitive to excess capacity¹ (see also [The world is flat](#)). As a result, we do not expect the Fed to hike aggressively on inflation news even if inflation surprises on the upside.

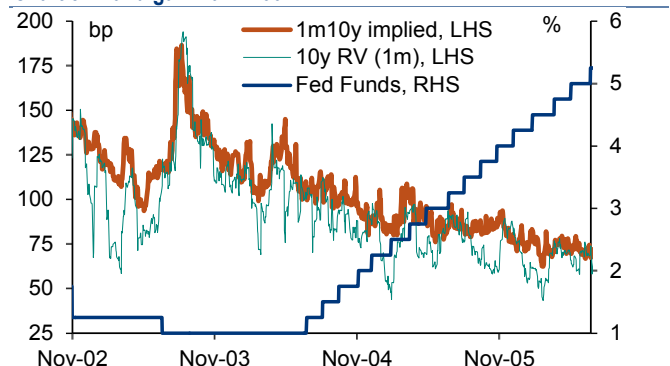
Further, because long-term inflation expectations are well anchored, we should expect a different curve reaction to positive inflation surprises. Assuming unchanged long-term growth expectations, positive inflation surprises and a hawkish Fed reaction would imply lower growth expectations in the longer term, so long-dated forward rates should decline despite the selloff in the front end in this scenario. We therefore do not expect the belly of the curve to move significantly even if inflation surprises on the upside.

Chart 2: Gamma in 1994...



Source: BofA Merrill Lynch Global Research

Chart 3: ...and gamma in 2004



Source: BofA Merrill Lynch Global Research

¹ See, for example, *IMF World Economic Outlook*, Chapter 3, April 2013.

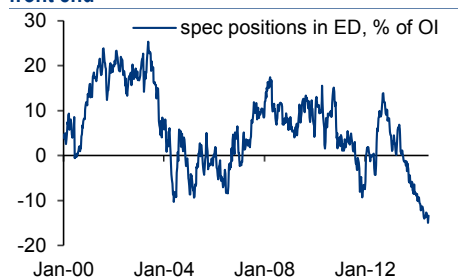
Table 4: Short gamma returns around the first hike in June 2004

| Period before/after first hike in June 2004 | Avg return on short 1m10y, cents |
|---|----------------------------------|
| 12m before | 13.13 |
| 6m before | 14.26 |
| 3m before | -2.38 |
| 3m after | -6.48 |
| 6m after | 11.41 |
| 12m after | 13.74 |

Note: The table reports average returns on a short 1m10y vol trade over 3m and 6m periods before and after the first Fed hike in June 2004. We assume the sale 1m10y delta-hedge straddles on a weekly basis and held until expiration to compute returns on the trade.

Source: BofA Merrill Lynch Global Research

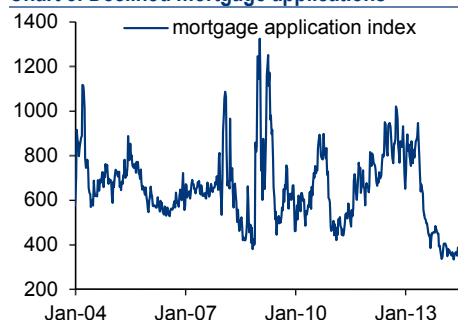
Chart 4: The market is positioned short in the front end



Note: The chart shows net positions of non-commercial accounts at the % of open interest.

Source: CFTC, BofA Merrill Lynch Global Research

Chart 5: Declined mortgage applications



Source: Bloomberg, MBA

2004 is a more relevant benchmark

From this point of view, the coming hiking cycle is more likely to resemble 2004 than 1994. Unlike in 1994, the Fed normalized rates at a measured and well communicated pace in 2004, which we expect will be the case in the coming cycle and is similar to the current measured approach to tapering. Because inflation expectations were well anchored at that time, the curve flattened – a market reaction very different from in 1994 when the curve bear-steepened. As a result, volatility did not undergo such dramatic outperformance at the start of Fed hikes as in 1994. Although vol did richen temporally in April 2004 when the market repriced the timing of the first hike from November 2004 to July 2004 and rates sold off, the magnitude of the vol spike was much smaller than in 1994 (Chart 3, previous page).

As a result, selling gamma was a profitable trade in 2004, on average. Although the trade underperformed in the three-month transition period before and after the first hike in June 2004, it was profitable, on average, in the six-month period immediately preceding and following the first hike (Table 4).

A hawkish Fed surprise is a risk to the short gamma trade

Based on the above historical analysis, we believe the short gamma trade is likely to continue to be profitable on average, and may become even more profitable once the Fed starts rate hikes. But an important risk to the trade is a potential Fed surprise during the transition period, which could trigger a significant selloff in rates similar to that observed in April 2004 and cause the trade to underperform.

However, we expect the magnitude of any potential hawkish surprise to be smaller than that of 2004. At that time, the market repriced the timing of the first Fed hike earlier by about four months. Because the OIS curve already is priced for the first hike in July 2015, a surprise of a similar size should bring the expected timing of the first hike to February 2015. As discussed in [Watching the dashboard](#) a handful of inflation and labor market indicators are required to collaborate for the Fed to change its view on the appropriate timing of rates hikes in such a significant way. Currently, only 9% of economists in the Bloomberg survey expect the first Fed hike in 1Q 2015. In addition, investors already appear to be positioned short in the front end of the curve, which should limit any selloff in this sector of the curve (Chart 4).

Even if the Fed surprises the market by signaling sooner hikes, we do not expect a selloff in the belly of the curve to be as large as the one in April 2004 when the 10y rate rose by about 130bp. The selloff in the back end was likely exacerbated by convexity paying at that time, which is evident from that fact spreads widened by about 20bp. But convexity risks are much smaller this time because of historically low mortgage origination and smaller presence of GSEs (Chart 5). In fact, combined MBS holdings of FNMA and FHLMC are about 35% smaller than in 2004 and should continue to decline.

One argument against our view is a large market selloff in the summer of 2013 when the 10y rate rose by more than 100bp on tapering signaling. But we do not think such a scenario is likely to repeat. At that time the surprise element was related to QE, which affected 10s directly rather than through Fed Funds expectations. In addition, investors were clearly caught off guard as the timing of QE3 was not very well communicated by the Fed. In contrast, there is little uncertainty about the timing of tapering at this time, while the timing of interest rate policy is communicated through Fed Funds projections and Fedspeak.

Expect vols to reach new lows when the Fed starts hikes

One risk to our short view on gamma is that implied vols are already close to historical low. Although the short gamma trade does not necessarily require implied volatilities to decline in order to be profitable, the return of volatilities back to historical norms is a risk to the trade. However, there are good reasons to expect the equilibrium level of rate volatility to be lower in the coming hiking cycle as well:

- The pace of Fed hikes is likely to be slower than in 2004. While the Fed delivered about 200bp hikes per year in the previous tightening cycle, the median FOMC participant expects only about 138bp of hikes in 2016. This is because the risks to the Fed are still asymmetric. While the Fed has ample ability to tighten policy, it has only limited room to ease. The risk management approach therefore argues for gradual policy normalization (see also [To be continued](#) for a more detailed discussion).
- There is growing evidence that the neutral Fed Funds rate has declined given persistent headwinds from recession and long-term structural factors such as aging population. In fact, the FOMC projects the neutral rate at only 3.75%. As a result, we expect rates to stay below historical averages in this cycle, which should imply lower average vols.
- As explained in [Are volatilities too low?](#), macroeconomic volatility is likely to be lower going forward due to the decline in trend growth and flatter Phillips curve.
- Leverage is unlikely to reach the same levels as in 2004-2006 given tighter regulations resulting in higher cost of balance sheet. This decreases the risk of large-scale positioning rebalancing, the build-up of crowded trades and systemic risk-off events. Although lower dealers' risk capacity may also result in the decline of the market depth and therefore could be a positive factor for local realized volatility, this is likely a second-order effect.
- As discussed above, mortgage-related demand for vol is likely to be much smaller relative to previous hiking cycles given smaller origination and smaller demand for convexity from mortgage portfolios.

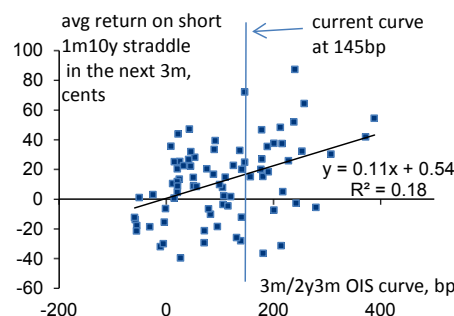
As a result, volatility in the belly of the curve has room to decline below historical lows when the Fed starts normalizing rates, in our view.

Sell gamma when the market is focused on Fed hikes

The above analysis also shows that investors can get clues about future gamma performance from the current market expectations of Fed policy. Future returns on gamma are likely to be less, on average, when investors expect Fed hikes further out in time than when investors expect sooner and faster Fed hikes. This is because the magnitude of any potential market repricing on a hawkish Fed surprise is likely to be larger in a situation when investors expect a longer Fed on-hold, while the room for surprises is smaller when the market already is focused on hikes. This idea is consistent with Table 2, which shows that selling gamma delivered higher returns, on average, during hiking cycles than during on-hold Fed cycles.

Of course, Fed cycles are only known ex-post, but investors may use the front end of the curve as an indicator of Fed policy expectations. This suggests we should expect higher future returns on selling gamma when the front end steepens, and lower when the front end flattens. Indeed, this appears to be the case empirically. Chart 6 shows the slope of the front-end of the curve, defined as the spread between 2y3m and 3m OIS rates, vs average returns on selling

Chart 6: Selling gamma worked best when the market was focused on Fed hikes



Note: The chart shows 3m/2y3m OIS curve vs average return on the short gamma trade over subsequent 3 months. We assume the sale of 1m10y delta-hedge straddles on a weekly basis and held until expiration to compute returns on the trade. We used quarterly data for this analysis to insure non-overlapping average returns.

Sample: 6/1994-3/2014.

Source: BofA Merrill Lynch Global Research

1m10y delta-hedged straddles in the next three-month period (using quarterly data). A steeper front end curve clearly predicted greater returns on the short gamma trade.

From this point of view, the current level of the 3m/2y3m curve at 145bp implies that selling gamma is likely to continue to be profitable in the near term (Chart 6). More importantly, it suggests that by scaling up the short gamma trade when the front-end curve steepens and by scaling it down when the front end flattens, investors may earn higher risk-adjusted returns on the short gamma trade. In particular, the pace of hikes implied by the curve is still slower than what is implied by the “dot plot”, and we would recommend scaling the short gamma trade up if the front end curve steepens.

Options Risk Statement

Options and other related derivatives instruments are considered unsuitable for many investors. **Options strategy is by definition governed by a finite duration. The most severe risks associated with general options trading are total loss of capital invested and delivery/assignment risk, all which can occur in a short period.**

Link to Definitions

Macro

Click [here](#) for definitions of commonly used terms.

Analyst Certification

I, Ruslan Bikbov, hereby certify that the views expressed in this research report accurately reflect my personal views about the subject securities and issuers. I also certify that no part of my compensation was, is, or will be, directly or indirectly, related to the specific recommendations or view expressed in this research report.

29 July 2014

Important Disclosures

BofA Merrill Lynch Research personnel (including the analyst(s) responsible for this report) receive compensation based upon, among other factors, the overall profitability of Bank of America Corporation, including profits derived from investment banking revenues.

BofA Merrill Lynch Global Credit Research analysts regularly interact with sales and trading desk personnel in connection with their research, including to ascertain pricing and liquidity in the fixed income markets.

Other Important Disclosures

Rule 144A securities may be offered or sold only to persons in the U.S. who are Qualified Institutional Buyers within the meaning of Rule 144A under the Securities Act of 1933, as amended.

SECURITIES DISCUSSED HEREIN MAY BE RATED BELOW INVESTMENT GRADE AND SHOULD THEREFORE ONLY BE CONSIDERED FOR INCLUSION IN ACCOUNTS QUALIFIED FOR SPECULATIVE INVESTMENT.

Recipients who are not institutional investors or market professionals should seek the advice of their independent financial advisor before considering information in this report in connection with any investment decision, or for a necessary explanation of its contents.

The securities discussed in this report may be traded over-the-counter. Retail sales and/or distribution of this report may be made only in states where these securities are exempt from registration or have been qualified for sale.

Futures and options are not appropriate for all investors. Such financial instruments may expire worthless. Before investing in futures or options, clients must receive the appropriate risk disclosure documents. Investment strategies explained in this report may not be appropriate at all times. Costs of such strategies do not include commission or margin expenses.

Officers of MLPF&S or one or more of its affiliates (other than research analysts) may have a financial interest in securities of the issuer(s) or in related investments.

From time to time research analysts conduct site visits of covered companies. BofA Merrill Lynch policies prohibit research analysts from accepting payment or reimbursement for travel expenses from the company for such visits.

This report, and the securities discussed herein, may not be eligible for distribution or sale in all countries or to certain categories of investors.

BofA Merrill Lynch Global Research policies relating to conflicts of interest are described at <http://www.ml.com/media/43347.pdf>.

"BofA Merrill Lynch" includes Merrill Lynch, Pierce, Fenner & Smith Incorporated ("MLPF&S") and its affiliates. Investors should contact their BofA Merrill Lynch representative or Merrill Lynch Global Wealth Management financial advisor if they have questions concerning this report.

"BofA Merrill Lynch" and "Merrill Lynch" are each global brands for BofA Merrill Lynch Global Research.

Information relating to Non-US affiliates of BofA Merrill Lynch and Distribution of Affiliate Research Reports:

MLPF&S distributes, or may in the future distribute, research reports of the following non-US affiliates in the US (short name: legal name): Merrill Lynch (France): Merrill Lynch Capital Markets (France) SAS; Merrill Lynch (Frankfurt): Merrill Lynch International Bank Ltd., Frankfurt Branch; Merrill Lynch (South Africa): Merrill Lynch South Africa (Pty) Ltd.; Merrill Lynch (Milan): Merrill Lynch International Bank Limited; MLI (UK): Merrill Lynch International; Merrill Lynch (Australia): Merrill Lynch Equities (Australia) Limited; Merrill Lynch (Hong Kong): Merrill Lynch (Asia Pacific) Limited; Merrill Lynch (Singapore): Merrill Lynch (Singapore) Pte Ltd.; Merrill Lynch (Canada): Merrill Lynch Canada Inc; Merrill Lynch (Mexico): Merrill Lynch Mexico, SA de CV, Casa de Bolsa; Merrill Lynch (Argentina): Merrill Lynch Argentina SA; Merrill Lynch (Japan): Merrill Lynch Japan Securities Co., Ltd.; Merrill Lynch (Seoul): Merrill Lynch International Incorporated (Seoul Branch); Merrill Lynch (Taiwan): Merrill Lynch Securities (Taiwan) Ltd.; DSP Merrill Lynch (India): DSP Merrill Lynch Limited; PT Merrill Lynch (Indonesia): PT Merrill Lynch Indonesia; Merrill Lynch (Israel): Merrill Lynch Israel Limited; Merrill Lynch (Russia): OOO Merrill Lynch Securities, Moscow; Merrill Lynch (Turkey I.B.): Merrill Lynch Yatirim Bank A.S.; Merrill Lynch (Turkey Broker): Merrill Lynch Menkul Değerler A.Ş.; Merrill Lynch (Dubai): Merrill Lynch International, Dubai Branch; MLPF&S (Zurich rep. office): MLPF&S Incorporated Zurich representative office; Merrill Lynch (Spain): Merrill Lynch Capital Markets Espana, S.A.S.V.; Merrill Lynch (Brazil): Bank of America Merrill Lynch Banco Múltiplo S.A.; Merrill Lynch KSA Company, Merrill Lynch Kingdom of Saudi Arabia Company.

This research report has been approved for publication and is distributed in the United Kingdom to professional clients and eligible counterparties (as each is defined in the rules of the Financial Conduct Authority and the Prudential Regulation Authority) by Merrill Lynch International and Bank of America Merrill Lynch International Limited, which are authorized by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, and is distributed in the United Kingdom to retail clients (as defined in the rules of the Financial Conduct Authority and the Prudential Regulation Authority) by Merrill Lynch International Bank Limited, London Branch, which is authorised by the Central Bank of Ireland and subject to limited regulation by the Financial Conduct Authority and Prudential Regulation Authority - details about the extent of our regulation by the Financial Conduct Authority and Prudential Regulation Authority are available from us on request; has been considered and distributed in Japan by Merrill Lynch Japan Securities Co., Ltd., a registered securities dealer under the Financial Instruments and Exchange Act in Japan; is distributed in Hong Kong by Merrill Lynch (Asia Pacific) Limited, which is regulated by the Hong Kong SFC and the Hong Kong Monetary Authority (note that Hong Kong recipients of this research report should contact Merrill Lynch (Asia Pacific) Limited in respect of any matters relating to dealing in securities or provision of specific advice on securities); is issued and distributed in Taiwan by Merrill Lynch Securities (Taiwan) Ltd.; is issued and distributed in India by DSP Merrill Lynch Limited; and is issued and distributed in Singapore to institutional investors and/or accredited investors (each as defined under the Financial Advisers Regulations) by Merrill Lynch International Bank Limited (Merchant Bank) and Merrill Lynch (Singapore) Pte Ltd. (Company Registration No.'s F 06872E and 198602883D respectively). Merrill Lynch International Bank Limited (Merchant Bank) and Merrill Lynch (Singapore) Pte Ltd. are regulated by the Monetary Authority of Singapore. Bank of America N.A., Australian Branch (ARBN 064 874 531), AFS License 412901 (BANA Australia) and Merrill Lynch Equities (Australia) Limited (ABN 65 006 276 795), AFS License 235132 (MLEA) distributes this report in Australia only to 'Wholesale' clients as defined by s.761G of the Corporations Act 2001. With the exception of BANA Australia, neither MLEA nor any of its affiliates involved in preparing this research report is an Authorised Deposit-Taking Institution under the Banking Act 1959 nor regulated by the Australian Prudential Regulation Authority. No approval is required for publication or distribution of this report in Brazil and its local distribution is made by Bank of America Merrill Lynch Banco Múltiplo S.A. in accordance with applicable regulations. Merrill Lynch (Dubai) is authorized and regulated by the Dubai Financial Services Authority (DFSA). Research reports prepared and issued by Merrill Lynch (Dubai) are prepared and issued in accordance with the requirements of the DFSA conduct of business rules.

Merrill Lynch (Frankfurt) distributes this report in Germany. Merrill Lynch (Frankfurt) is regulated by BaFin.

This research report has been prepared and issued by MLPF&S and/or one or more of its non-US affiliates. MLPF&S is the distributor of this research report in the US and accepts full responsibility for research reports of its non-US affiliates distributed to MLPF&S clients in the US. Any US person receiving this research report and wishing to effect any transaction in any security discussed in the report should do so through MLPF&S and not such foreign affiliates.

29 July 2014

General Investment Related Disclosures:

Taiwan Readers: Neither the information nor any opinion expressed herein constitutes an offer or a solicitation of an offer to transact in any securities or other financial instrument. No part of this report may be used or reproduced or quoted in any manner whatsoever in Taiwan by the press or any other person without the express written consent of BofA Merrill Lynch.

This research report provides general information only. Neither the information nor any opinion expressed constitutes an offer or an invitation to make an offer, to buy or sell any securities or other financial instrument or any derivative related to such securities or instruments (e.g., options, futures, warrants, and contracts for differences). This report is not intended to provide personal investment advice and it does not take into account the specific investment objectives, financial situation and the particular needs of any specific person. Investors should seek financial advice regarding the appropriateness of investing in financial instruments and implementing investment strategies discussed or recommended in this report and should understand that statements regarding future prospects may not be realized. Any decision to purchase or subscribe for securities in any offering must be based solely on existing public information on such security or the information in the prospectus or other offering document issued in connection with such offering, and not on this report.

Securities and other financial instruments discussed in this report, or recommended, offered or sold by Merrill Lynch, are not insured by the Federal Deposit Insurance Corporation and are not deposits or other obligations of any insured depository institution (including, Bank of America, N.A.). Investments in general and, derivatives, in particular, involve numerous risks, including, among others, market risk, counterparty default risk and liquidity risk. No security, financial instrument or derivative is suitable for all investors. In some cases, securities and other financial instruments may be difficult to value or sell and reliable information about the value or risks related to the security or financial instrument may be difficult to obtain. Investors should note that income from such securities and other financial instruments, if any, may fluctuate and that price or value of such securities and instruments may rise or fall and, in some cases, investors may lose their entire principal investment. Past performance is not necessarily a guide to future performance. Levels and basis for taxation may change.

BofA Merrill Lynch is aware that the implementation of the ideas expressed in this report may depend upon an investor's ability to "short" securities or other financial instruments and that such action may be limited by regulations prohibiting or restricting "shortselling" in many jurisdictions. Investors are urged to seek advice regarding the applicability of such regulations prior to executing any short idea contained in this report.

This report may contain a trading idea or recommendation which highlights a specific identified near-term catalyst or event impacting a security, issuer, industry sector or the market generally that presents a transaction opportunity, but does not have any impact on the analyst's particular "Overweight" or "Underweight" rating (which is based on a three month trade horizon). Trading ideas and recommendations may differ directionally from the analyst's rating on a security or issuer because they reflect the impact of a near-term catalyst or event.

Foreign currency rates of exchange may adversely affect the value, price or income of any security or financial instrument mentioned in this report. Investors in such securities and instruments effectively assume currency risk.

UK Readers: The protections provided by the U.K. regulatory regime, including the Financial Services Scheme, do not apply in general to business coordinated by BofA Merrill Lynch entities located outside of the United Kingdom. BofA Merrill Lynch Global Research policies relating to conflicts of interest are described at <http://www.ml.com/media/43347.pdf>.

Officers of MLPF&S or one or more of its affiliates (other than research analysts) may have a financial interest in securities of the issuer(s) or in related investments.

MLPF&S or one of its affiliates is a regular issuer of traded financial instruments linked to securities that may have been recommended in this report. MLPF&S or one of its affiliates may, at any time, hold a trading position (long or short) in the securities and financial instruments discussed in this report.

BofA Merrill Lynch, through business units other than BofA Merrill Lynch Global Research, may have issued and may in the future issue trading ideas or recommendations that are inconsistent with, and reach different conclusions from, the information presented in this report. Such ideas or recommendations reflect the different time frames, assumptions, views and analytical methods of the persons who prepared them, and BofA Merrill Lynch is under no obligation to ensure that such other trading ideas or recommendations are brought to the attention of any recipient of this report.

In the event that the recipient received this report pursuant to a contract between the recipient and MLPF&S for the provision of research services for a separate fee, and in connection therewith MLPF&S may be deemed to be acting as an investment adviser, such status relates, if at all, solely to the person with whom MLPF&S has contracted directly and does not extend beyond the delivery of this report (unless otherwise agreed specifically in writing by MLPF&S). MLPF&S is and continues to act solely as a broker-dealer in connection with the execution of any transactions, including transactions in any securities mentioned in this report.

Copyright and General Information regarding Research Reports:

Copyright 2014 Merrill Lynch, Pierce, Fenner & Smith Incorporated. All rights reserved. This research report is prepared for the use of BofA Merrill Lynch clients and may not be redistributed, retransmitted or disclosed, in whole or in part, or in any form or manner, without the express written consent of BofA Merrill Lynch. BofA Merrill Lynch research reports are distributed simultaneously to internal and client websites and other portals by BofA Merrill Lynch and are not publicly-available materials. Any unauthorized use or disclosure is prohibited. Receipt and review of this research report constitutes your agreement not to redistribute, retransmit, or disclose to others the contents, opinions, conclusion, or information contained in this report (including any investment recommendations, estimates or price targets) without first obtaining expressed permission from an authorized officer of BofA Merrill Lynch.

Materials prepared by BofA Merrill Lynch Global Research personnel are based on public information. Facts and views presented in this material have not been reviewed by, and may not reflect information known to, professionals in other business areas of BofA Merrill Lynch, including investment banking personnel. BofA Merrill Lynch has established information barriers between BofA Merrill Lynch Global Research and certain business groups. As a result, BofA Merrill Lynch does not disclose certain client relationships with, or compensation received from, such companies in research reports. To the extent this report discusses any legal proceeding or issues, it has not been prepared as nor is it intended to express any legal conclusion, opinion or advice. Investors should consult their own legal advisers as to issues of law relating to the subject matter of this report. BofA Merrill Lynch Global Research personnel's knowledge of legal proceedings in which any BofA Merrill Lynch entity and/or its directors, officers and employees may be plaintiffs, defendants, co-defendants or co-plaintiffs with or involving companies mentioned in this report is based on public information. Facts and views presented in this material that relate to any such proceedings have not been reviewed by, discussed with, and may not reflect information known to, professionals in other business areas of BofA Merrill Lynch in connection with the legal proceedings or matters relevant to such proceedings.

This report has been prepared independently of any issuer of securities mentioned herein and not in connection with any proposed offering of securities or as agent of any issuer of any securities. None of MLPF&S, any of its affiliates or their research analysts has any authority whatsoever to make any representation or warranty on behalf of the issuer(s). BofA Merrill Lynch Global Research policy prohibits research personnel from disclosing a recommendation, investment rating, or investment thesis for review by an issuer prior to the publication of a research report containing such rating, recommendation or investment thesis.

Any information relating to the tax status of financial instruments discussed herein is not intended to provide tax advice or to be used by anyone to provide tax advice. Investors are urged to seek tax advice based on their particular circumstances from an independent tax professional.

The information herein (other than disclosure information relating to BofA Merrill Lynch and its affiliates) was obtained from various sources and we do not guarantee its accuracy. This report may contain links to third-party websites. BofA Merrill Lynch is not responsible for the content of any third-party website or any linked content contained in a third-party website. Content contained on such third-party websites is not part of this report and is not incorporated by reference into this report. The inclusion of a link in this report does not imply any endorsement by or any affiliation with BofA Merrill Lynch. Access to any third-party website is at your own risk, and you should always review the terms and privacy policies at third-party websites before submitting any personal information to them. BofA Merrill Lynch is not responsible for such terms and privacy policies and expressly disclaims any liability for them.

29 July 2014

All opinions, projections and estimates constitute the judgment of the author as of the date of the report and are subject to change without notice. Prices also are subject to change without notice. BofA Merrill Lynch is under no obligation to update this report and BofA Merrill Lynch's ability to publish research on the subject company(ies) in the future is subject to applicable quiet periods. You should therefore assume that BofA Merrill Lynch will not update any fact, circumstance or opinion contained in this report.

Certain outstanding reports may contain discussions and/or investment opinions relating to securities, financial instruments and/or issuers that are no longer current. Always refer to the most recent research report relating to a company or issuer prior to making an investment decision.

In some cases, a company or issuer may be classified as Restricted or may be Under Review or Extended Review. In each case, investors should consider any investment opinion relating to such company or issuer (or its security and/or financial instruments) to be suspended or withdrawn and should not rely on the analyses and investment opinion(s) pertaining to such issuer (or its securities and/or financial instruments) nor should the analyses or opinion(s) be considered a solicitation of any kind. Sales persons and financial advisors affiliated with MLPF&S or any of its affiliates may not solicit purchases of securities or financial instruments that are Restricted or Under Review and may only solicit securities under Extended Review in accordance with firm policies.

Neither BofA Merrill Lynch nor any officer or employee of BofA Merrill Lynch accepts any liability whatsoever for any direct, indirect or consequential damages or losses arising from any use of this report or its contents.