# **Calibration of the Structural Model of Corporate Bond Spreads**

Peter Lerner and Chunchi Wu<sup>1</sup>
October 3, 2005

<sup>1</sup> Peter Lerner and Chunchi Wu are at Syracuse University. We thank the participants of the Finance Seminar at the Whitman School of Management, University of Syracuse and EFA meeting, April 2004. Contact address: Whitman School of Management, University of Syracuse, Syracuse, NY 13244.

# **Calibration of the Structural Model of Corporate Bond Spreads**

#### **Abstract**

It has been long recognized that endogenous default probabilities cannot explain spreads between corporate and the riskless bonds. Recently, this issue has been subjected to rigorous scrutiny. Previous studies have found that for investment-grade debt, structural models explain only 15-25% of the observed spreads. On the other hand, for the high-yield debt, the structural models exaggerate actual spreads 1.5-2 times. These findings are perplexing because, while one could argue that factors other than default risk, e.g. illiquidity, can influence the spread for investment-grade bonds, it is difficult to justify the findings for junk bonds. In this paper, we offer an explanation to these puzzling results. Specifically, we account for the differential tax treatment of regular income and capital gains. In addition, we consider the uncertainty of the residual assets due bondholders, as well as the tax liability of the residual asset. We argue that the uncertainty in the claims on the future assets of the company in the case of potential default drives the spreads of an investment-grade debt as much as, if not more than, the probability of default.

# Calibration of the Structural Model of Corporate Bond Spreads

There are two principal approaches for modeling the term structure of defaultable bonds. The structural approach was pioneered by Black and Scholes (1973) and Merton (1974) and extended by Black and Cox (1976), Longstaff and Schwartz (1995), Collin-Dufresne and Goldstein (2001) and Collin-Dufresne, Goldstein and Spencer Martin Structural approach provides an integrated framework that simultaneously (2001).addresses the issues related to capital structure, default probability and yield spreads. Structural models allow for the pricing of debt where no proxy exists, or the firm's capital structure changes as a result of debt issuance or changing tax regimes. On the other hand, the reduced-form approach (Jarrow and Turnbull (1995) and Duffie and Singleton (1999)) treats corporate bond default as an unpredictable stopping time of a random process involving a sudden loss in the market value of the firm. The advantages of the reduced-form approach are its analytical tractability and empirical flexibility to fit observed credit spreads. However, there is no clear link between firm value and default, and so the determinant of the hazard rate of default is unknown. In contrast, the structural approach is often able to generate important economic insights on the behavior of the hazard rate of default.

On the empirical front, neither the structural models nor the reduced-form models are able to explain the corporate bond spread satisfactorily (see Jones, Mason and Rosenfeld (1984), Huang and Huang (2002) and Collin-Dufresne, Goldstein and Spencer Martin (2001)). In particular, Huang and Huang (2002) found that only a small fraction (15-25%) of the spread between Treasuries and investment-grade corporate bonds can be explained by default risk. For lower-quality bonds, the spread calculated from probabilities of default often significantly exceeds actual spreads. Hund (2003) and Ericsson and Remby (2004) attribute the credit puzzle to the statistical misspecification of the structural model. Recently, Liu and Wu (2004), using the reduced-form model, find that the problem of estimating the spread can be significantly reduced if one takes into account tax effects.

The structural approach has a distinct advantage over the reduced-form approach for modeling the tax effect; in particular it allows the tax factor to interact with financing and operating decisions. As such, one can identify the channels through which default

risk and taxes affect corporate bond spreads relatively easily. In this paper we adopt the structural approach to incorporate the effects of taxes into the term structure model to analyze their effects on spreads.

Despite its flexibility, there are important insights currently missing from the structural models. Structural models take as their input the historical market data for the company and its financial statements. Yet, as it is the case with equity, the most important drivers for the future value are the market estimate of the value added by the current management (macroeconomists like to refer to this as Tobin's q) and the changes in regulatory environment. Both factors are absent in the traditional structural approach. We simulate the influence of these two factors by (1) the uncertainty in the terminal value of the firm in the case of default and (2) different personal income and corporate tax rates.

The influence of the tax structure on the corporate value has been recently affirmed by Graham (2003). In Table 1 of his paper, he displays main changes in the tax regime between 1970 and 2000. For our preliminary study we choose the 30-months period between mid-1994 and 1996. In this period, marginal personal income tax stayed at 36%, the consequence of the tax raise by Clinton, and the corporate tax was the same for income and capital gains at 35%. Capital gains tax for individuals was 28% in 94-95 but fell to 20% in 1996. In the simulations with the assumed tax rates, we obliquely account for the fact of this transition.

Our model incorporates many features of Longstaff-Schwartz (1995, hereafter LS), Anderson-Sundaresan-Tychon (1996, hereafter AST) and Mella-Barral and Perraudin (1996, hereafter MP) models, all of which sprang from the classical work of Merton (1974). As we will demonstrate later, these models have deep conceptual differences despite their formal affinities and almost identical formulaic expressions. Unlike these models, we incorporate taxes in the pricing of corporate bonds.

We find that our tax model performs much better than previous models. In our model, shorter-maturity investment-grade bond yields can be accurately fitted by the asset volatility not exceeding 15%. Applying the fitted parameters from the short-term bond series to the longer-maturity bonds of the same firm explains 30-40% of the spread by default risk, which is considerably higher than the estimates of the previous studies. If we fit the tax rate and recovery ratio for the long-term bonds directly, we can almost

completely account for the average size of the spread. Longer-maturity junk debt can also be fitted quite successfully.

The remainder of this paper is organized as follows. In Section 1, we develop a simple formula for valuing corporate debt. The main feature of this formula, as in all endogenous formulas, is the existence of the "trigger value" for default. In Section 2, we provide the expression for the trigger value using the correspondence principle of the AST and MP theories. In Section 3, we conduct simulations to explain the behavior of spreads. In Section 4, we calibrate the model with AT&T and Revlon bonds. In Section 5, we comment on a methodology of empirical estimates of the asset volatility. Finally, we summarize major findings and conclude the paper in Section 6.

# 1. Expected value of risky debt

We start from a different premise than previous studies using the structural approach. Previous studies typically begin with calculating (or postulating) the trigger value for default and then explore the properties of corporate debt. On the contrary, we propose a heuristic formula for valuation of corporate debt and then derive the default trigger value. We favor this approach because double taxation of corporation influences debt in several ways. First, taxes influence the potential value of the firm for creditors in the case of default. Second, they alter the net cash flow. Third, because the potential value of the firm to creditors is different from that in the no-tax case, the boundary for the corporate default is shifted as well.

In formulation of their model, AST (1996) propose a game-theoretical framework to derive the equation for debt pricing. Our framework is different due to the presence of taxes and additional stochastic risk factors with respect to asset volatility. Yet, it is constructed along a similar line. We show the two-stage (default-no-default) game in Figure 1.<sup>2</sup> According to the probability structure in Figure 1, we decompose the price of the risky debt  $D_0$  at time t=0 into three components:

$$D_0 = F_T - CB(W, W^*; T) + S(W, W^*, T)$$
(1)

where  $F_T$  is the price of the riskless debt with time T to maturity (e.g., U.S. Government bonds),  $CB(W, W^*, T)$  is the loss (cost-of-bankruptcy) to bondholders in case of default,

<sup>&</sup>lt;sup>2</sup> We can compare this figure with AST's Figure 1.

and  $S(W, W^*, T)$  are the gains resulting from the acquisition of assets of the impaired company by its creditors. In (1), W is the firm's asset value,  $W^*$  is the trigger value initiating the bankruptcy procedure and T is the time to maturity. We impose the following assumptions: first, we assume a flat term structure of U.S. Treasuries at an average value for the observation period r, and consider only one category of zerocoupon debt, and second, we consider both capital gains and ordinary income taxes. Assumption (1) will be replaced in subsequent sections with actual data from observed U.S. Treasury rates, which we treat as exogenous parameters of the model.

The present value of the riskless zero-coupon debt is (Lando, 2004))

$$F_T = F_0 E_t \left[ \exp(-\int_t^T r(t')dt') \right]$$
 (2)

where  $F_0$  is equal to the face value of the firm's debt,  $E_t$  is an expectation at the current time t, r(t) is a riskless rate and T is time to maturity. The present value of riskless debt is not affected by taxes by assumption (2).<sup>3</sup>

To quantify two other terms we need to establish what exactly happens at the moment of corporate bankruptcy. The answer may seem self-evident but different theories provide divergent answers to this question.

The value-based AST theory conceptualizes a "strategic default", which is triggered by stockholders to extract concessions from bondholders in terms of cost of debt servicing.<sup>4</sup> Because of this possibility, bondholders require a premium, which manifests itself in a spread between risky and riskless debts. In the income-based MP theory, the concept of strategic default is also present but they introduce explicit parameters to describe the operation of the company after default. In this theory, there is a potential difference between liquidation bankruptcy and operating bankruptcy, which we shall ignore.<sup>5</sup> The practical trigger of the default in the MP model is the fall of its

<sup>&</sup>lt;sup>3</sup>Correct formulation of Equation (2) would be  $F_T = F_0 \exp(-rT)[(1-\tau_1)+\tau_c]$  where the first term reflects investor's income tax and the second term—contribution of tax shield from interest to corporate income tax but we propose  $\tau_i = \tau_c$ . Moreover, the implicit tax (Scholes and Wolfson (1992)) is incorporated in observable Federal interest rate, which we treat exogenously. This sterilizes taxation effect on riskless debt, as we expect it would.

<sup>&</sup>lt;sup>4</sup> See AST (1996), p. 878.

<sup>&</sup>lt;sup>5</sup> MP introduces two ad hoc factors to describe this situation:  $\xi_0$ <1—the reduction in output and  $\xi_1$ >1—the increase in costs. Contrary to naïve intuition, operating default occurs at a much higher level of debt,

equity value to zero.<sup>6</sup>

We adopt an alternative static concept of default. It assumes neither the exact reason for default nor its precise timing. The firm, which issues the debt, simultaneously buys an implicit option to stop interest payments if its equity value V falls below some trigger value typically considered as zero. This reduces the value of risky debt. This view of credit spread is similar in spirit to the Longstaff-Schwartz (LS) model. However, the firm also sells the option to bondholder to acquire its assets with all its profitable uses under the same conditions in return for relinquishing its rights for receiving interest. From bondholders' the point of view, they acquire an option to swap their claim of ownership of corporate debt to the ownership of corporate assets net of bankruptcy costs in the event of default.

Thus, the value of the second term in (1) can be modeled as a  $F_T$  units of binary put<sup>7</sup> on assets  $W = V + D_T$  with the exercise price equal to the trigger value  $W^*$  which we shall calculate in Section 2. In the case when the firm value falls below the trigger value  $W^*$ , the  $F_0$  face amount of bonds in their hands becomes worthless, i.e., at the exercise of the option, bondholders lose  $F_T$ :

$$CB(W,W^*;T) = F_T P_R^{(1)}(W,W^*,T)$$
 (3)

The term  $P_B^{(1)}(W, W^*, T)$  has the intuitive meaning of the default probability. As it will be shown later, the value of  $W^*$  is affected by the capital gains tax rate.

The value of the third term in (1) is the price of another binary option,<sup>8</sup> with the same exercise price multiplied by the fraction ( $\delta$ ) of corporate assets, which the firm owes to bondholders:

$$S(W, W^*, T) = \delta P_B^{(2)}(W, W^*, T)$$
 (4)

because at a higher level of debt, bondholders have more to lose in case of bankruptcy and thus are eager to negotiate better conditions for equityholders.

<sup>&</sup>lt;sup>6</sup>Duffie and Lando (2001) treat the firm's value in the spirit of the agent theory as resulting from an information asymmetry between stockholders (owners, insiders) and bondholders (outsiders). In their approach, bankruptcy eliminates this asymmetry because creditors become the insiders after default. Spreads are explained in terms of the uncertainty in accounting information. An intrinsic feature of their theory is the stochastic asset density and its unobservable distribution is driven by the so-called "accounting noise".

<sup>&</sup>lt;sup>7</sup> Hull (1997) calls this binary *cash-or-nothing put*.

<sup>&</sup>lt;sup>8</sup> Hull (1997) calls this binary asset-to-nothing put.

The "number of units" of this put is equal to the corporate value *W*. The third term constitutes the bondholder's gains on the acquisition of assets of the defaulted firm and is subject to the capital gains tax rate.

If we try to fit this naïve paradigm into an option-based valuation, we can readily ascribe appropriate tax rates to the terms in (1). Namely, the symbolic expression for the market value of corporate debt is the following (compare with Schönbucher (1998)):

$$D_{t}(1-\tau_{c}) = E_{t}^{Q} \left[ F_{0} e^{-\int_{-r_{c}}^{T} r_{s} ds} 1_{t \ge T} \right] (1-\tau_{c}) + E_{t}^{Q} \left[ (-F_{0} + \theta W)^{+} e^{-\int_{-r_{c}}^{T} r_{s} ds} 1_{t < T} \right] (1-\tau_{cg})$$
 (5)

where  $\tau_c$  is a corporate tax rate and  $\tau_{cg}$  is a marginal personal tax rate on capital gains. We shall discuss this expression in more details in the Section 2, in relation with the AST and MP models.

Note that initially we assume no pre-set analytic formula for the prices of binary options. Nor do we propose that debt price  $D_t$  obeys any explicit differential equation. Valuation of binary calls can be influenced by a particular analytic model, and the condition of exercise (European, or more realistically American, with different covenants or indentures). Below we shall use conventional Black-Scholes option valuation but we emphasize that the BS-type formulas are invoked simply for the purpose of analytical tractability. Note, that the moneyness factors in BS option pricing formulas are independent of  $\theta$  because the default is determined by the actual, not collected, firm value W crossing the threshold.

The analytical BS form for the cash-or-nothing put is given by (Hull (1997)):

$$P_{BS}^{(1)} = e^{-rT} N(-d_2) (6)$$

where  $d_2 = (\log(W/W^*) + (r-Div-\sigma^2/2)T)/\sigma T^{1/2}$ , for the tax-free case, Div is the dividend yield and  $\sigma$  is the asset volatility. We immediately notice that the value of the argument of the cumulative normal distribution (moneyness of the option) coincides with the distance-to-default—a metric introduced heuristically by KMV corp.—under the risk-neutral measure (see Lando, (2004)).

8

<sup>&</sup>lt;sup>9</sup> KMV corp.—San Francisco-based provider of risk analytics.

Similarly, the formula for the asset-or-nothing put can be written as

$$P_{BS}^{(2)} = We^{-rT}N(-d_1) \tag{7}$$

where as usual,  $d_1 = d_2 - \sigma T^{1/2}$ . Equation (7) does not account for an important effect. Namely, in the traditional structural approach, the default boundary is determined by the market value of the company. However, in the event of default, the market value of the company far from default is meaningless. What matters here is the liquidation value.

In the tax-free world with  $\theta = 1$  (complete transfer of firm's assets to bondholders), using Black-Scholes pricing formula, we can reduce Equation (5) to the familiar expression for zero-coupon debt (Longstaff and Schwartz (1995), Collin-Dufresne and Goldstein (2001), and Das (2001)):

$$D_{t} = F_{T-t} - p_{RS}(W, W^{*}, T - t)$$
(8)

where  $p_{BS}$  is a price for Black-Scholes plain vanilla put with the exercise price equal to the trigger value W\*.

As indicated in Figure 1, (5) simply means that in the event of default, the bondholders become de-facto equityholders because of their primary claims on assets. However, this option is not free. They lose the face value of the now-worthless debt, but acquire some uncertain  $\theta$  portion of the asset and pay capital gains taxes (or receive a tax rebate) on the difference. Capital gains tax rate for individuals is lower than the ordinary income tax rate. A natural assumption for the recovery process  $\theta$  is that it is independent from the corporate asset process and obeys the following equality:

$$E^{\mathcal{Q}}[\theta \mid I_0] = \delta$$

where  $I_t$  is the information available by time t and  $t^*$  is the (unspecified) time of default.

We provide the following example to emphasize the practical importance of the latter consideration. Imagine two companies with an identical capital structure, but while the first is prospering, the second is failing. Obviously, the former one has a good credit rating (and consequently, a low credit spread) and the latter has a bad credit rating (high spread). Yet in the event of default, they offer a comparable value to their creditors if we ignore the recovery factor  $\delta$ , which has been already taken into account in (4). Why does this happen? Intuitively, the residual assets are indifferent to the credit rating assigned in the past. In the quantitative finance paradigm, default of a "good" firm is a more

informative event than a default of a "bad" firm and hence, reduces corporate value on a larger scale.

In the fully consistent approach, we should price the second term in (5) as a compound option:

$$E_{t}^{\mathcal{Q}}\left[\left(-F_{0}+\theta W\right)^{+}e^{\int_{t}^{T}r_{s}ds}1_{t< T}\right]=E_{\vartheta}^{\mathcal{Q}}\left[\left[E^{\mathcal{Q}}\left(-F_{0}+\theta W\right)^{+}e^{\int_{t}^{T}r_{s}ds}1_{t< T}\right]\right]\theta=\vartheta$$

Instead, we replace the price of the compound option with the price of the plain-vanilla put multiplied by an adjustable parameter  $\beta_V$ , which reflects the difference between liquidation and market values of the company:<sup>10</sup>

$$D_{t} = F_{t} - F_{t}N(-d_{2})\left(1 + \beta_{V} \frac{1 - \tau_{cg}}{1 - \tau_{i}}\right) + \beta_{V} \delta WN(-d_{1}) \frac{1 - \tau_{cg}}{1 - \tau_{i}} = F_{t} - p_{BS}(W, W^{*}, T) - \left\{WN(-d_{1})[1 - \beta_{V} \delta^{1 - \tau_{cg}}] + \beta_{V} F_{t}N(-d_{2})^{1 - \tau_{cg}} / 1 - \tau_{i}\right\}$$

$$(9)$$

The meaning of (9) is as follows. Because the market value of the healthy firm is usually larger than the liquidation value of its assets, the correction factor is typically  $\beta_V < 1$ . Because capital gains tax rate is lower or equal to an income tax rate, bondholders typically benefit from a tax rebate when they and not the company, liquidate property. Because this option is implicit in corporate bonds at the time of issuance, it *decreases* the value of the bond and thus raises the spread. This effect would be absent if (1)  $\tau_{cg} = \tau_i$ , (2)  $\delta = 1$  (all assets of the defaulting firm are collected) and (3)  $\beta_V = 1$  (market and liquidation values of assets are the same). For the low-rated firm either  $\delta$  or  $\beta_V$  may become negative (see the Section 4B) and the default-implied spread may exceed the spread taking these effects into account.

In Section 3, we shall use Equation (9) to estimate the yield of the risky debt. For the demonstration in Section 3, we shall use  $\beta_V = 1$ . For empirical tests, however, we shall treat  $\beta_V$  as an adjustable parameter. We expect its value to be close to

$$\beta_V = \frac{\overline{B}\overline{V}}{\overline{M}\overline{V}}$$

where BV is an average book value and MV is an average market value for the period.

 $<sup>^{10}</sup>$  We do not know anything about the character of the process governing evolution of  $\theta$  and its specification would be an imposition.

Our formulation of the problem still lacks a definition of  $W^*$  which we shall provide in the next section. As shown in Figure 1, the parameter  $\beta_V$  is equivalent to a linear approximation of transformation of the outcomes tree into a riskless frame. This choice is not unique.

# 2. Trigger value for corporate default

While in formulating the framework for corporate debt we follow the LS model, we shall use the structural approach of AST and MP to calculate the trigger. In Huang and Huang (2002), Anderson-Sundaresan-Tychon and Mella-Barral-Perraudin models are grouped together. In fact, despite the look-alike equations, these two models, as well as Longstaff-Schwartz model and their common predecessor—Merton's classical model (1974, hereafter M74) are different in very substantive aspects. There are two main conceptual distinctions among the AST and MP models. Below we formulate a synthetic approach, which combines the features of both models. However, in their principal conclusions, the models must agree. For their agreement, their parameters must be connected by a number of equalities, which we formulate in Appendix A. We call this agreement a "correspondence principle".

As we have seen, the AST model is based on the Bellman equation for the debt price with the firm value as a dependent variable. This equation can be deduced from the following set of equations on W, the firm value, and Y = F(W,t), the value of debt. Next, we introduce taxes into the Merton framework:

$$\begin{cases} dW = (\alpha W - C)(1 - \tau_c)dt + \sigma(1 - \tau_c)^{1/2}Wdz \\ dY = (\alpha_Y - \beta_Y(1 - \tau_i))Ydt + \sigma_Y(1 - \tau_{cg})^{1/2}Ydz_Y \end{cases}$$
(10)

where  $\alpha$  is the return on assets, C is the (taxable) payout to the stockholders and debtholders,  $\alpha_Y$  and  $\beta_Y$  are the expected return and the dollar payout rate of the debt, respectively. Here, we add an individual income tax  $\tau_i$ . Our goal is to determine  $W^*$ -- the value for which company would be unable to pay coupon on its debt. The ordinary income tax rate is applied to firm's profits and debt payouts.

Modeling of the corporate debt value by the second equation in (10) is inconsistent. In general, we do not know, whether debt value Y obeys any closed-form

stochastic differential equation. Thus our definition of trigger will be obtained in a simplified framework more reminiscent of the reduced-form approach.

In Merton's model,  $\alpha_Y$  and  $\sigma_Y$  are unobservable state parameters and they are calculated in an after-tax gauge. The standard deviation of the firm value is scaled as a  $(1 - \tau_c)^{1/2}$  because we can express dz as  $\varepsilon(dt)^{1/2}$  where  $\varepsilon$  is a normally distributed variable with a unit standard deviation and the time value of money is reduced by the factor  $(1 - \tau_c)$ . If we follow Merton's derivation, we obtain the following equation:

$$\frac{F_{t}}{1-\tau_{c}} + \left(\beta_{y} \frac{1-\tau_{i}}{1-\tau_{c}} - r\right) F + (rW - C) F_{W} + \frac{1}{2} \sigma^{2} \left(\frac{1-\tau_{cg}}{1-\tau_{c}}\right) W^{2} F_{WW} = 0$$
 (11)

Here, we must caution that rescaling of the asset volatility for tax factor is redundant for empirical tests because the observed volatility already incorporates tax effects but it is absolutely necessary for consistency when simulating variable tax regimes. We seek the solution of the stationary Bellman equation in a conventional form:

$$F(W) \propto W^{\gamma} \tag{12}$$

If we use the AST approximation  $(\beta_Y Y = \beta W)$ , for  $W > W^*$ , we arrive at the following algebraic expression for it roots:

$$\gamma_{1,2} = -\left(\frac{(r(1-\tau_c)-\beta(1-\tau_i))}{\sigma^2(1-\tau_{cg})} - \frac{1}{2}\right) \pm \sqrt{\left(\frac{(r(1-\tau_c)-\beta(1-\tau_i))}{\sigma^2(1-\tau_{cg})} - \frac{1}{2}\right)^2 + \frac{2r(1-\tau_c)}{\sigma^2(1-\tau_{cg})}}$$
(13)

To calculate the trigger value, we start with the equation of the MP model for the value

$$rV(p_t) = p_t - w - b + \frac{d}{d\Delta} E_t(V_t) \bigg|_{\Delta=0}$$
(14)

where  $p_t$  is the price of the firm's output, w is current non-interest expenses and b is the interest expense. We can interpret the left hand side as a risk-free return on equity (thus, needed to be multiplied by  $(1-\tau_c)$ ) and the first three terms on the right-hand side as cash flow to equity. In a taxable framework, corporate tax rate is applied to net cash flow to

<sup>&</sup>lt;sup>11</sup> The meaning of this approximation is that returns on firm's assets are spread between debt and equity in their exact proportions in firm's capital.

equity, which is represented by first three terms in Equation (14). The expected value consists, by Ito's lemma, of two terms: the expected growth of the asset and the diffusion term. Utility of cash flows from dividends (coupons) for the investor is multiplied by the ordinary income tax rate  $\tau_i$ , while the drift term is multiplied by capital gains tax rate  $\tau_{cg}$ . The resulting equation is

$$r(1-\tau_c)V(p) = (p-w-b)(1-\tau_c) + \mu(1-\tau_i)pV'(p) + \frac{1}{2}\sigma^2(1-\tau_{cg})p^2V''(p)$$
 (15)

where  $\tau_{cg}$  is a capital gains tax rate. Equation (15) results in the same characteristic equation for the parameter  $\chi$  as does the W-dependent Equation (11) in the AST version. If we seek the solution of (15) in the form:

$$V(p) = A + Bp + Cp^{\gamma} \tag{16}$$

with A, B and C being indeterminate coefficients, we get the formula for the trigger value defined as  $W^* = W(p_b)$ , where  $p_b$  is a root of an equation  $V(p_b) = 0$ . When we use Table 1, Appendix A, for identification of parameters, we obtain

$$W^* = \frac{1}{1 - 1/\gamma_2} \left( \frac{c(1 - \tau_i) F_0}{r(1 - \tau_c)} + K_2 \right)$$
 (17)

Together with (13) for  $\gamma_2(\tau_c, \tau_{cg})$ , the negative root of the Bellman equation corrected for the taxes and  $K_2$ , the fixed cost of bankruptcy, this expression formally solves the trigger value problem in the presence of taxes. We now proceed to the calculation of  $W^{**}$ , the terminal value of the firm in the presence of incomplete recovery ( $\delta < 1$ ).

In the case of a complete recovery,  $W^{**} = W^{*}$ . However, a typical recovery of corporate assets is incomplete and strongly depends on the seniority of the debt (see, for example, Fabozzi, Wilson and Todd in Fabozzi (2001)). Instead of the AST formula,

$$W^{**} = W^* + (1 - \delta)W^{**}$$

and consequently,

The above-cited correspondence principle between MP and AST allows us to express  $K_2$  as

 $K_2 = \left(\frac{\beta}{r} - \frac{(1 - \gamma_2)\tau_c}{(1 - \tau_c)\gamma_2}\right)$ , but we use adjusted book value (see Appendix B) as a proxy for the bankruptcy cost.

$$W^{**} = W^* / \delta \tag{18}$$

Equation (18) has the heuristic meaning that if the collection factor is close to zero, the company needs to have almost infinite assets to provide for an equity cushion in the case of default.<sup>13</sup> We have now the tax-modified expressions

$$W^{**} = W^* + (1 - \delta(1 - \tau_{cg}))W^{**}$$

and

$$W^{**} = W^* / \delta(1 - \tau_{cg}) \tag{19}$$

The capital gains tax shield, available to the creditors in case of default, raises the strike price of the put option to default, which reduces the price of debt but it also increases the payout of the post-default collections. The expected value of the firm's debt is influenced by the capital gains tax rebate even when the firm is far from default. This influence, as we shall see, is typically negative for the good-quality credit and positive for the junk debt.

#### 3. Qualitative simulations

Equation (1) with parameters defined by Equations (9) and (13-19) provides an implicit algebraic equation (both r.h.s. and l.h.s. contain  $D_0$ ) for the value of corporate debt. This equation can be solved through the iteration procedure for the deterministic function V(t)—average equity value of the corporation. In the simulation, we treat interest rates and volatility as constant. We solve the equation for certain values of model parameters. In most cases, we use the following values to price the options: r = 5%, Div = 2%,  $\beta = 3\%$ , w = 1.5 (operational expenses; capitalized value of current expenses w/r = 30% of the face value of the long-term debt),  $\delta$  (recovery factor) = 0.6. Tax rates are  $\tau_i = 35\%$  and  $\tau_{cg} = \tau_c = 20\%$ . The face value of the debt is 100 and equity value at t = 0 is 80. Stock price is a linear function of time growing at 13.4% (positive outlook) or 3.6% (negative outlook).

In Figure 2, we plot two pairs of yield curves: one for the positive and the other for the negative stock outlook with and without the capital gains tax. All the curves have

<sup>&</sup>lt;sup>13</sup> This particular circumstance explains why even the sound companies have a poor credit rating in emerging markets with poor enforcement of bankruptcy laws.

the humped shape, a characteristic for the LS-type models, but yields drastically decrease, especially for shorter maturities, if we eliminate the capital gains tax. This happens because in the absence of taxes, there is little difference between debt and equity as components of the capital structure. The higher is the tax rate, the larger is the potential tax rebate in the case of default. Because, all else equal, this implies higher company value at default, the probability of the default increases. For longer maturities, this effect dominates the rescaled volatility (see Eq. (11)), and the slope of the curve without capital gains taxes becomes more gradual than for the taxable yield curve.

Figure 3 illustrates the effect of the quality of debt. The control parameter which we use to change the debt quality is leverage or debt-equity ratio: low for investment grade bonds and high for junk bonds. We observe that our simple approach reproduces a qualitative shape of the curves as a function of maturity if we identify the first curve with high-grade bonds, the second curve with medium-grade bonds and the third curve with the low-grade bonds. Namely, the junk bond spread diminishes with time to maturity, the investment-grade bond spread increases and on the borderline between investment-grade and junk bonds, the spread as a function of time to maturity has a characteristic humped shape (Das (2001)).

In Figure 4, we demonstrate the effect of adding taxes on spreads in the structural model. For the speculative-grade debt, between 20% and 40% of the spread is explained by the tax effect. In Figure 5, we demonstrate the fact that the influence of taxes varies with debt quality. For high-grade debt, almost all of the spread is explained by the residual value of the corporation in the case of default. For intermediate-grade debt, the tax-related portion falls off. For low-grade bonds the advantage of capital loss tax rebate in the case of default outweighs the expected loss of face value and decreases the spread. The relative influence of taxes on spreads may change with maturity for medium-grade debt. This conclusion agrees very well with the results of a tax-free treatment of Huang and Huang (2002): the higher the grade of debt, the smaller portion of the spread could be explained by default probability. On the contrary, default-inferred yields of low-quality debt were exaggerated by as much as 146% (see also Huang and Huang (2002), Table 3). This premium on a low debt quality seems irrational in a tax-free framework.

For taxable companies without much probability of default, taxes decrease the payout to investors. The implicit collection/rebate option is out of the money and does

not influence the bond price. This increases the spread. For low-grade bonds, the option to take over the company is close to be in the money, which, in the case of low market value of the expected payments, increases the value of the debt to the bondholder.

# 4. Fitting of the two companies to the structural model

### A. Investment-grade bonds

For model calibration, we use thirty monthly yields of AT&T corporate bonds between June 1994 and December 1997. AT&T has a long history of corporate bond issuance. AT&T bonds are relatively liquid and there are several series of bonds. We compare their yields with the actual interest rate curve for the T-bonds with the same time to maturity. To build the synthetic T-bond we use the GovPX data on constant maturity Treasuries rates of which we linearly interpolated between quoted maturities. In the present analysis, we choose not to model the riskfree rate so as to focus on the effect of taxes. The results are shown on Figures 6 and 7.

We attempt to fit the spread curve using two adjustable parameters: asset volatility and  $\beta_V$  (proxy for average market-to-book value, see Equation (9)). We extract corporate parameters as averages from the AT&T balance sheets and income statements for the same period (1994-1996). For an explanation of the parameter values, see Appendix B.

We first use average riskfree interest rate and average share value to fit the spread curve. We also use monthly riskfree interest rates to simulate the nonlinear response of the spread to the shocks of the riskfree rate. Fitted asset volatility is roughly 15%, which still seems too high. Yet, the fit without considering taxes would provide volatility of 20-30%. Our observation is, that while it is possible to fit the structural model to the actual spread, it requires excessive volatility as reported by Collin-Dufresne and Goldstein (2001). However, the inclusion of taxes allows us not only to reduce this volatility very significantly (by about 50%), but to provide a natural explanation of the anomalous behavior of low-grade debt documented by Huang and Huang (2002). The results of our simulations are displayed in Figure 8. The first approximation reproduces average behavior of the spread much better and the second approximation demonstrates some correlation with the peaks and troughs of the observed spreads for the periods longer than 8-9 months to expiration.

To evaluate the quality of our calibration, we use the parameters obtained from the 001957AC bond series to calculate the implied spreads on the bond series of 001957AD, 001957AH, 001957AE, 001957AF, and for test purposes, the BellSouth bond 079857AA in the same 30-month period. Of course, each bond series could be better fitted with its own set of parameters, but this would devalue the structural model because underlying all of these bond series except one is the same corporation. The mean square errors for  $\sigma$  and  $\beta_V$ , which were fitted from the bond 001957 AC are displayed in Table 2.

Table 2. Summary of fitting errors

Bond series	Mean square	MSE1/Average	Notes	
	errors (%)	spread (%)		
001957AC	0.110	35.6	Benchmark bond	
001957AD	0.0130	35		
001957AH	0.0367	65.7		
001957AE	0.0316	66.3		
001957AF	0.0349	71.3		
079857AA	0.0082	22.2	BellSouth bond	

We show the match of the average-interest rate approximation (the same as used in solid curve, Figure 8) in Figures 9 and 10. In Figure 9, we group together bonds with remaining maturities 0-17 months at the end of the period, which we shall name a "short-term" group. We observe that the average spread is reproduced more or less accurately, while the shape does not fit as well. One of the results is that our structural parameters fit BellSouth bond very well, which indicates that there is not enough distinction in the market between corporate bonds of similar risk and industry, because the balance sheet and income statement parameters for BellSouth were different from that of AT&T.

Longer maturity bonds (28-51 months to maturity at the end of the period) follow a different pattern in Figure 10. The central tendency of the spreads to increase gradually with decreasing time to maturity is retained but the numerical value of the spread is barely 40% of the real value.

We propose a very simple solution to a long-standing structural model spread puzzle. If we fit another series of bonds, 1957AF, with three adjustable parameters:  $\sigma$ —

the asset volatility,  $\beta_V$ —the risk-adjustment parameter for asset collection and  $\tau_c$  – the implied corporate tax rate, we get an overall agreement of the spreads with the following values of parameters:  $\sigma = 13.1\%$ ,  $\beta_V = 0.093$  and  $\tau_c = 19.45\%$  (see Fig. 11). We note that the difference in new asset volatility is not significant and probably can be explained by volatility smile absent in our model. The implied corporate tax rate is close to the 20%. This agrees well with some observations that implied corporate tax rate is much lower than the maximum statutory tax rate.

Table 3. Fitting errors under new specification for the long-term bonds

Bond series	Average 30-M	O Ave	rage	30-MO	Mean square	MSE/Average	
	spread (emp., bp)		spread (calc., bp)		errors (%)	spread (%)	
001957AH	56		46		0.0131	25	
001957AE	47		34		0.02434	44.8	
001957AF	49		31		0.0408	41.2	

Another adjustable parameter which is much different from the fitting of the 1957AC series of bonds is  $\beta_V$ , which is reduced from its value of 0.159 for the nearmaturity bonds almost by half. Remembering the heuristic meaning of the parameter  $\beta_V$ from the end of Section 1, we can formulate our conclusion in the hypothetical form. Larger spreads than those predicted by default probability in structural models for the investment-grade bonds are due to the: (1) uncertainty in tax rate at the time of maturity of the corporate bonds and (2) uncertainty in assets that could be claimed by bondholders at default. The first consideration decreases the advantages implicit in the tax shield from debt. The uncertainty in the claimable assets is also larger for investment-grade bonds than for the junk debt because investment-grade bonds are likely to be issued by firms with a high MV/BV ratio. This ratio reflects information asymmetry between the value of corporate assets implied by market participants (market value) and the accounting residual (book value). In other words, for the "good" company, its market value is based on assumptions that its managers add a lot of value, which will evaporate in the unlikely event of default. For the company presumed "bad", implied management-added value is small or even negative.

### B. High-yield bonds

As an example of a high-yield bond, we select Revlon Worldwide bond series 76154KAB for the same 30-month period (06/1994-12/1996). The situation with Revlon during this period was highly irregular: the company had negative book equity. Revlon's stock was publicly quoted beginning in 1996. Consequently, this calibration test is of a hypothetical nature because in theory the corporation with negative book equity should cease to exist, and certainly cannot have any market value. Otherwise, this would imply a negative market-to-book ratio.

We use the following non-adjustable structural parameters, which we infer from the balance sheet and income statements. If we assume average long-term debt for Revlon during 1995-1996 as 100%, the 1996 market cap of Revlon is 74% and its book value is -37%. Company paid no dividends and the payout ratio (0.75 for 1996 and 1.108 for 1995-1996) was irrelevant. We calculate the market cap from the numbers of shares outstanding 1994-1996 from the balance sheet (the income statement uses a different number of outstanding shares for year 1996, which closely agrees with the number of shares on the balance sheet). The provision for income taxes from Revlon income statement implied an abnormal 51% tax rate for 1996 and comparable dollar figures for years 1994 and 1995, despite the fact that Revlon lost money during these years! Certainly, the company was highly distressed and the market gave a junk bond status for its debt.

Nevertheless, for our simulations we apply standard 35% corporate tax rate for Revlon and 20% capital gains tax rate for the Revlon investors. During this period, we observe a significant spread (up to 1200 bp) between different categories of Revlon debt. Revlon Consumer Products and Revlon, Inc. had better credit quality than Revlon Worldwide and the spreads between two former groups could be positive as well as negative. We do not know which institutional reasons singled out Revlon Worldwide bond as especially risky. We assume the recovery rate  $\delta = 20\%$ , which is typical for junior subordinated debt (see Das (2001), Figure 6.10).

The best fit for asset volatility was  $\sigma = 44\%$  and  $\beta_V = -5.80$ . Here, very high asset volatility is not so surprising because we deal with a company with a theoretical leverage higher than 100%. The large and negative value for  $\beta_V$ , in principle, correctly indicates (see the end of Section 1) that the bondholders expect that the asset value, to which they

can lay claim after the bankruptcy, is negative<sup>14</sup>, but this interpretation is purely speculative. If we stretch this interpretation to the limits, because of the numerical value  $\beta_V \delta = -1.16 \approx -1$ , investors could have expected that, before the default, the management may split the company with the Revlon Worldwide obligations being transferred to the "poorer sister" of the corporate twins. We note here that in the case of junk bonds with substantial probability of default within a predictable horizon, there is much less uncertainty with respect to the corporate assets that can be collected as well as the accrued tax benefits.

### **5.** Estimation of asset volatility of the real companies

Asset volatility of the real companies, despite the ubiquity of the concept, is rarely estimated though the methods to do it are taught now in every course of corporate finance. Namely, any corporation can be represented by a fictitious undiversified balanced mutual fund consisting of three types of investments: risk-free investments (cash and short-term assets and liabilities), bonds (its own debt) and stock (its own equity: stock and retained earnings). This statement has been rigorously proven by Hellwig (1981). The volatility and covariance of each type of these assets/liabilities can be calibrated with historical data and added up according to the conventional statistical formula for variance. The weights for these types of assets can be extracted from a balance sheet analysis. We can deduce the percentage weights of cash and cash equivalents, debt and debt equivalent and equity (retained earnings are ascribed the volatility of company's stock). If we perform these calculations, we estimate AT&T asset volatility as 9% and Revlon asset volatility as 50.3% (the parameters of our estimates are listed in Appendix C). With our analytic model, we need an implied volatility of 13-15% for AT&T and 44% for Revlon for the best fit. Thus, for investment-grade debt, our simulations reduce the mismatch of implied asset volatility from 2.5-3 in the most previous applications of the structural model to 50%. For junk bonds, our implied volatility is even smaller than its empirical value. We found this fact as re-assuring for the future of structural models.

\_

<sup>&</sup>lt;sup>14</sup> Because of negative capital, the bondholders were expected to inherit obligations to the owners of higher seniority debt and to other claimants rather than acquire capital assets from the bankruptcy.

<sup>&</sup>lt;sup>15</sup> Marriott used this tactics in 1993 and the memory was still fresh in investor's minds in 1994-1996. For background on the Marriott case, see Parrino (1997) and the references therein.

### 6. Extension of the results for the larger samples

To extend the results for the larger samples, we must collect structural data for many companies in a unique format for many years to provide a feed for the structural model. As the natural starting point for the determination of the structural parameters we take the sample of companies, analyzed by Bakshi, Madan and Zhang (Bakshi, Madan and Zhang, 2000), further BMZ. Namely, they analyzed bonds of 25 companies: eight financial, seven industrial and six utility and energy companies (four remaining companies were in other categories), which they observed from 1989 to 1998. Authors of BMZ compared them with the bonds from the universe containing 46,262 bond observations of 93 companies (24 financials, 48 industrials and 21 utilities) in the period of 10 years.

Because BMZ tables do not provide us with all the structural data, which we need to compute yield curves, we selected the S&P Industry Survey list of representative companies in each sub-sector (S&P 1995, S&P 1999), which broadly encompass the bulk of market cap in their sector for the same ten-year period, but also represent mid-size and small firms. For these companies, we computed the necessary structural parameters by direct data mining from the S&P Industry Survey data. The results for select data parameters are presented in Fig. 13-14.

We used an MLE of the average spread of the utility sector (approximated by electric utilities from S&P Industry Survey) to infer the unobservable structural parameters: asset volatility, income tax rate and collection uncertainty factor. The asset collection ratio was chosen as to confirm to the average AA rating of utility bonds in the considered period (see BMZ, Table 1). The maturity of the bonds was fixed close to the rounded off average maturity of the bonds in the BMZ sample (100 months $\approx$ 8.3 years as opposed to 8.14 years in BMZ sample) and the fitting was done for the term of  $\pm$ 15 month around this maturity. Our values were  $\sigma$ =14.8%,  $\tau_i$ =21% and  $\beta_V$ =0.526. We present yields as function of volatility and collection factor in the Fig. 15. The asset volatility of 15% for the utilities looks as slightly exaggerated, though closer to reality than 25-30% of some previous studies. Effective tax rate is again, as in the case of ATT bonds, is close to the capital gains rate, and confirming to the naïve wisdom that all

implied taxes are capital gains in the long run. Future investigations will show whether this is a coincidence.

#### 7. Conclusion

In this paper, we propose a solution to the spreads puzzle in a structural model. Previously, it was considered that realistic default probabilities are too low to explain the spread, especially for investment grade bonds. Our explanation is the following: we must take into account the uncertainty not only of the asset volatility, but also of an implied tax rebate from default and an expected value of collectible assets several years from now. The latter two causes of risk are absent for the near-maturity bonds as well as for the junk bonds for which the time of expected default is near.

Introducing taxes allows us to reduce the implied asset volatility of the structural model from unreasonable 25-30% to a somewhat exaggerated value of 13-15%. Moreover, tax and seniority effects explain the overshooting phenomenon for corporate bonds observed by Huang and Huang (2002). Huang and Huang observe that for low-quality bonds, default-based models overestimate the observed spread. Our model avoids this problem. We argue that this is a result of the implied probability of a takeover when the creditor can (1) acquire the assets of a distressed company in the case of bankruptcy and (2) receive tax rebates from writing down of the debt. Companies with poor credit quality (high yield, and low equity coverage of the trigger value) have a higher expected value of these residual assets for bondholders than the firms with good credit and less informational uncertainty with respect to collection.

For investment-grade bonds, we fit the parameters of the structural model to the shortest maturity bond. The mean square error of this fitting is between 0.1% and 0.17% dependent on a particular approximation. With these parameters, we calculate the spread for other bonds. For bonds with shorter time to maturity, the MSE is between 0.08% and 0.13%.

The ratio between actual spread and MSE is 22-36% for the shorter time-to-maturity bonds, which is somewhat indicative of unexplained spread variation. If we apply the parameters from the fitting of the short time-to-maturity bond (0-27 months), they reproduce only 30-40% of the spread for the longer-maturity investment-grade bonds (82-51 months). If we adjust corporate tax levels and the uncertainty in value of

assets, available for collection by the bondholders, for the long-term separately, we can explain 70-80% of the magnitude of the spread.

For high-yield bonds, similar accuracy can be achieved without any adjustments for collection rate and the implicit tax rate. Even in our case of highly distressed nature of company's equity, <sup>16</sup> our version of the structural model seems to be sufficiently robust to justify its application.

-

<sup>&</sup>lt;sup>16</sup> During the period of study, Revlon had negative book equity which contradicts conventional wisdom of financial theory.

# Appendix A

Both AST and MP models involve the same Bellman equation, which is frequently called Black-Scholes in the context of finance, but for different variables. In the AST model, following the original treatment in M74, the Bellman equation was written for a bond price B(V,t) as a function of time and a corporate equity value. In the MP model, a similar equation is deduced for the value V as a function of the price of firm's output (of a single good) p. Default is triggered by  $V(p_t) = 0$  and expressed in terms of output price. For practical purposes, output prices are unobservable. Even single-commodity producers, for which market prices are publicly available such as power plants, sell their output in a number of spot and derivative transactions and one must have the information on the entire portfolio to calculate the weighted average price.

The second difference is that the MP model is cashflow-based, while the AST model is value-based. Consequently, income tax is easier to be incorporated into the MP framework and capital gains tax is easier to be included in the AST model. Below is the table of correspondences between the AST and MP models.

Table 1. Correspondence between the parameters of AST and MP models

AST	MP	Notes
cF <sub>0</sub>	b	Self-evident
K	(r-μ)w/r <sup>2</sup>	If debtholders trigger bankruptcy they receive expected return on the riskless value of its liabilities and accounts payable w/r
$W^*$ (trigger value for $\delta$ =1)	p <sub>b</sub> /r	See the text below and Section 2
$W^{**}$ (trigger value for $\delta < 1$ )	N/A	See the end of the Section 2 for tax-induced corrections

Here, c is the coupon,  $F_0$  is the face value of the debt (which they assume to be a perpetual bond),  $^{17}$  b is the cost of debt service,  $\mu$  is the expected growth, w is the operational expense and  $p_b$  is the trigger price for the firm's output below which it cannot perform its debt obligation. To introduce taxes into the structural model framework, we use the "correspondence principle" under which the AST and MP models must agree in the sense that the expression for taxes, which is introduced in AST framework, must be true also in the MP framework.

-

<sup>&</sup>lt;sup>17</sup> There is a legitimate question: to what extent we can apply the AST and MP results obtained for perpetual bond for real-life studies. We can postulate that we approximate preferred stock of the company by a perpetual bond and assume that the company declares bankruptcy when it ceases to pay dividends on the preferred stock. The difference between this definition and the actual default can be subjected to empirical verification.

# Appendix B

Our model demands as inputs: (1) dividend yield, (2) payout ratio, (3) tax rates, recovery ratio, (4)  $K_2$  (liquidation value of assets) and (5)  $V_0$ —market value of equity. Inference of an average dividend yield and the payout ratio from the balance sheet and the income statement is relatively straightforward. For taxes, we use tax rates of 35% for the personal income tax rate and 20% for corporate taxes. Recovery ratio is not directly observable and we assume it equal to 42%. For comparison, according to the Moody's report, in the period of 1977-1998, average recovery rate for all public debt was 45.02%, for all senior categories of unsecured debt was 40.67% and for the average defaulted bonds during 1974-1995 was 45.26% (see Das (2001), Figures 6.10, 6.11).

We use the book value of the firm net or gross of capital leases, which we identify with the category of "other (non-current) debt" on the AT&T balance sheet for the proxy of liquidation value of assets  $K_2$ . We use all non-current debts of corporation net of tax items, as a proxy for the face value of debt. This presumes that: (1) coupon bonds are currently traded at par, and (2) deferred taxes and investment tax credits cannot be inherited by new owners. We calculate this value net or gross of capital leases consistently with their inclusion in  $K_2$ . The difference in the values calculated by neglecting or including capitalized leases is not significant and we take an average of their values.

For the market value of equity, we use the average of end-of-month stock price (\$77.42 per share for the whole period) multiplied by the average number of shares outstanding during the respective calendar year. For the value of a long-term debt, we use averages from 1994-1996 balance sheets, mainly bonds outstanding and capital leases.

We compute parameter  $\beta_V$ , by minimizing the sum of squared errors of fitting the calculated to observed yields, as 0.242. In Section 1 we notice that  $\beta_V$  should be close to the book-to-market ratio for the firm. Average book-to-market ratio for the years 1994-1996 was 0.159, the agreement which we find acceptable.

<sup>&</sup>lt;sup>18</sup> Loans secured by banks or collateralized by equipment have higher recovery rates, but this is not indicative for the pricing of publicly held corporate debt.

**Appendix C** 

We express the parameters for the estimation of asset volatility in the following table:

Volatilities	ATT	Revlon	Correlations	ATT	Revlon	Weights	ATT	Revlon
$\sigma_{Cash}$	1.4%	1.4%	PCash-Stock	-0.44	0.47	W <sub>Cash</sub>	0.176	0.026*
$\sigma_{Stock}$	14.4%	31.7%	PStock-Bond	-0.44	0.47*	W <sub>Stock</sub>	0.617	-2.61*
$\sigma_{\mathrm{Bond}}$	1.41%	17.2%	ρ <sub>Bond-Cash</sub>	0.98	-0.47	W <sub>Bond</sub>	0.207	3.58*

<sup>\*</sup> The equity of the Revlon Corporation was negative during the period, which was stated in the balance sheet as corporate deficiency. Consequently, the leverage was higher than 100% and the sum of the weights exceeded 1, which is impossible if we are to interpret weights in the framework of probability theory. To account for this irregularity, we (1) normalized the sum of weights to one and (2) *reversed* the empirical sign of stock-bond correlations.

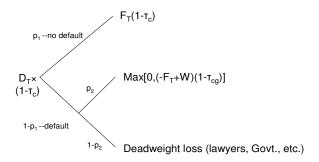


Fig. 1. The two-period game of corporate debt.

The probability  $p_1$  is calculated by the Black-Scholes model. Note that this game is not risk-neutral. The return on  $D_T$  is equal to the bond yield and not to the risk-free rate. To return the debt valuation to a risk-free frame, we introduce an adjustable parameter  $\beta$  for the residual value (see Section 1), though this choice is not unique.

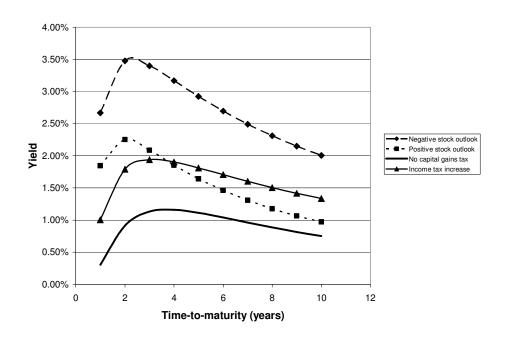


Fig. 2. Plots of bond yields as a function of time to maturity.

r=5%, Div=2%,  $\beta$ =3%, w=1.5 (operational expenses), and  $\delta$  (recovery factor)=0.6. Tax rates are  $\tau_c = \tau_i$ =35% and  $\tau_{cg} = 20$ % (both dashed curves),  $\tau_c = \tau_i$ =35%,  $\tau_{cg} = 0$ % (no capital gains tax case) and  $\tau_c$ = $\tau_i$ =50%,  $\tau_{cg} = 20$ % (increased income tax case). The face value of debt is 100 and equity value at t=0 is 80. Stock price is a linear function of time growing at 13.4% (positive outlook for equity growth) or 3.6% (negative outlook for equity growth). Parameters are the same for Figs. 1-4 unless specifically mentioned. Boldfaced curve indicates case of zero capital gains with a positive outlook for corporate equity, triangular shapes mark the no-capital gains tax case and negative outlook, squares and diamonds indicate the taxable case with positive and negative outlook, respectively.

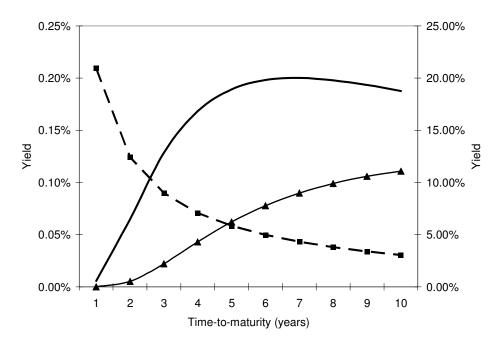


Fig. 3. Yield as a function of equity coverage and time-to-maturity.

High-quality debt ( $V_0$ =V/ $F_0$ =300, triangles), medium-quality debt ( $V_0$ =180, boldface) and low-quality debt ( $V_0$ =30, squares, dashed line). The left axis applies to the two solid curves, and the right axis to the dashed curve.

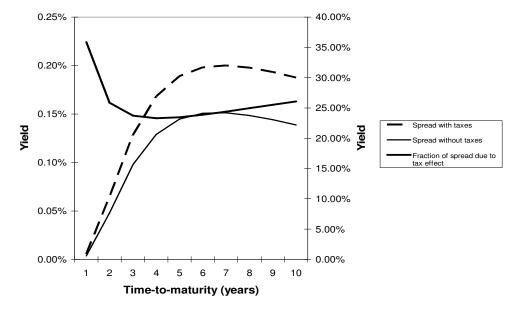


Fig. 4. Spread between taxable (dashed) and tax-free (regular line) debt.

For medium-grade debt quality,  $V_0=180$ . On the second axis, we plot the percentage of spread due to taxation (boldfaced line).

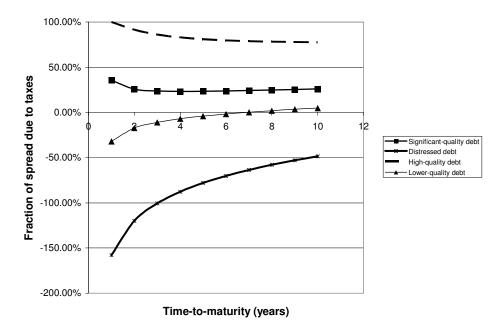


Fig.5. Ratio of bond spreads in taxless and taxable cases as a function of time-to-maturity.

A positive tax signifies increase and a negative fraction—decrease of the spread due to the introduction of taxes. High-quality debt, with initial equity debt coverage of V/D=3.0 (dashed line), significant-quality debt, V/D=1.8 (squares), lower-quality debt, V/D=0.8 (triangles) and highly distressed debt, V/D=0.3 (boldfaced line). For debt with poorer quality, the tax effect can change sign. For the debt with junk status the spread significantly decreases because of the implied possibility of taking over the assets of the defaulting firm.

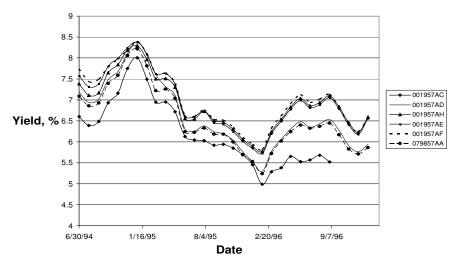
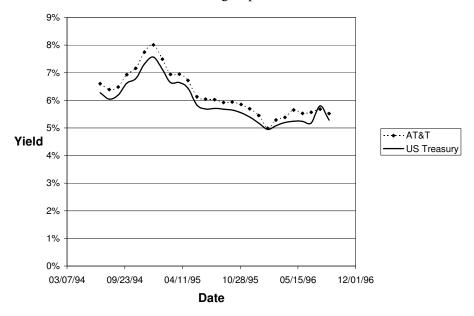


Fig. 6. Yields of corporate bonds.

We display AT&T bonds 001957 series AC, AD, AH, AE and AF and, for comparison, BellSouth bond 0079857AA. Independent of expiration time, they exhibit a significant degree of co-movement. Moreover, the difference between BellSouth bond and AT&T bond AE is less than the difference inside the AT&T bond group.



**Fig. 7. Spreads between synthetic U.S. Treasury bond and AT&T bond 001957AC.** The negative spread for the month preceding the expiration is probably the artifact of the AT&T bond's illiquidity and the lack of reported price movement.

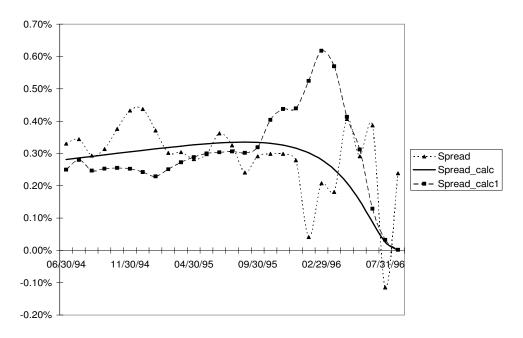


Fig. 8. Observed spreads between AT&T 001957AC and a synthetic T-Bond

Both bonds expire on 08/30/1996. Observed spread is shown in triangles, dotted line. The calculated spreads are given: (1) by the structural model with average interest rates (solid line) and (2) by the structural model with actual monthly interest rates (squares). Parameters used: dividend yield 2.54%, payout ratio 40.5%,  $\tau_c$ =35%,  $\tau_c$ =20%,  $\delta$  (recovery ratio) = 42%,  $K_2$  (liquidation value of assets) = 163.7 (in units of face value of debt=100) and  $V_0$  = 526, in the same units. The model with taxes reduces asset volatility necessary for the fit to 14.9% and  $\beta_V$ =0.159. Methodological notes on the numerical values of these parameters are provided in Appendix B.

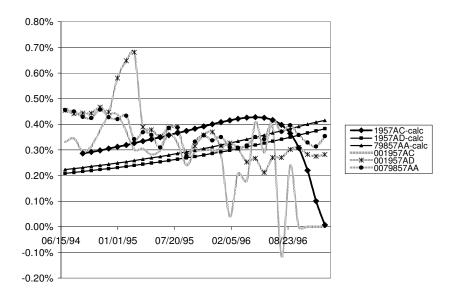


Fig. 9. Calculated and true spreads of the short-term group of bonds.

We observe that the curves correctly reproduce average spreads, while the general shape is different. There seems to be little difference between spreads of AT&T bonds and BellSouth bond 0079857AA. In fact, BellSouth spreads follow the pattern of the closest in maturity bond 001957AD more accurately than the other bonds of the AT&T series. This suggests a general lack of differentiation in the corporate bond market.

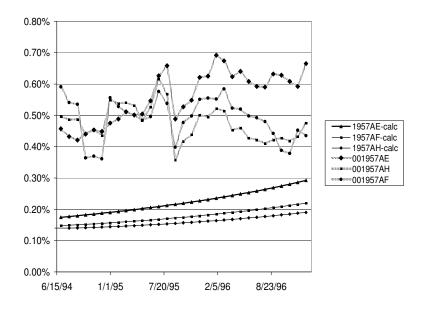


Fig. 10. Spread for longer time-to-maturity bonds.

The long-term bond series (28-51 months to maturity in the end of the period) demonstrate a general increase in spreads with a diminishing time to maturity but calculated spreads are roughly 40% of their observed values.

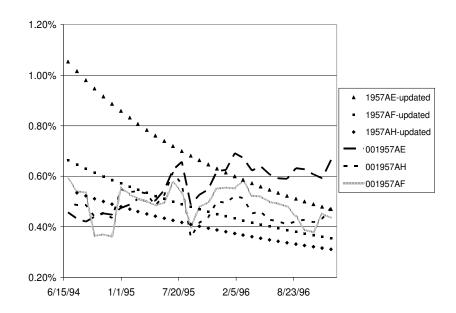


Fig. 11 Spreads for longer time-to-maturity bonds with updated parameters.

Here we have  $\sigma$ =13.1% (14.7%),  $\beta_V$ =0.093 (0.159) and  $\tau_c$ =19.45% (35%). Old parameters are listed in parentheses.

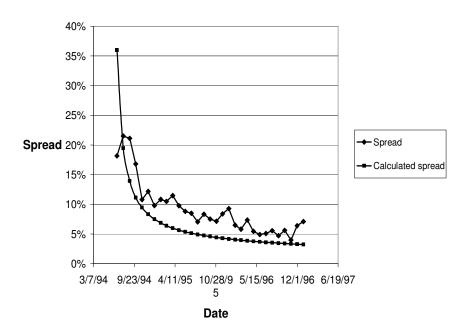
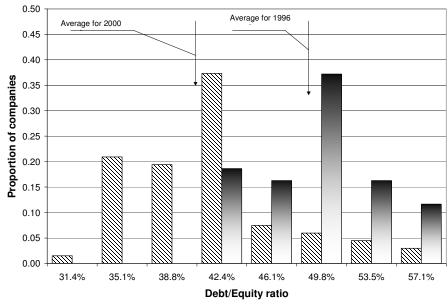


Fig. 12. Fitting of the spread for the distressed Revlon debt.

Spread of the high-yield bonds of Revlon Worldwide series 76154KAB for the 30-month period (06/94-12/96). Fitting parameters are outlined in the text. The shape is qualitatively correct and quantitatively agreeable despite a highly irregular situation: namely, negative book equity for Revlon for the period.



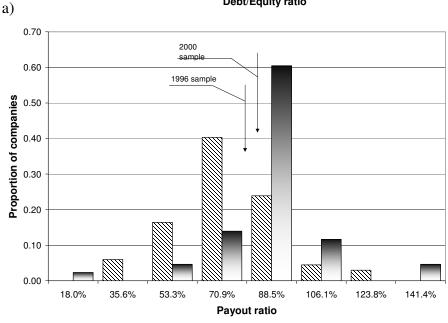
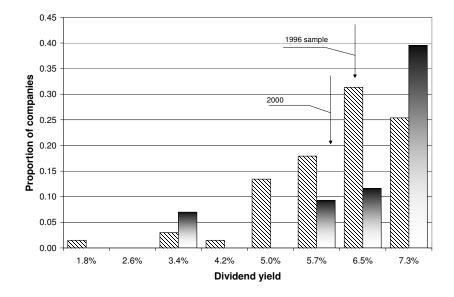


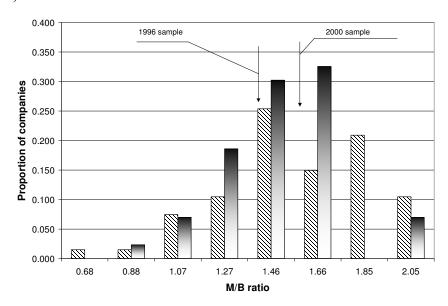
Fig. 13. Debt/Equity ratio (a) and payout ratio (b) for Electric Utilities.

b)

The data for 1989-1993 (S&P 1995 sample; 42 companies) are shown in black-and-white shade, the data for 1994-1998 (S&P 1999 sample; 68 companies) are shown in oblique dash. Proportions of companies do not necessarily add to 100% because of chart outliers. The companies in the second half of nineties became better capitalized and distributed more to their stakeholders in form of dividends and interest.



a)



b)

Fig. 14. Dividend yield and Market-to-book ratio for Electric Utilities sample.

Notation and sample description are the same as in Fig. 14. Dividend yield fell in the second half of the period but M/B ratio has grown.

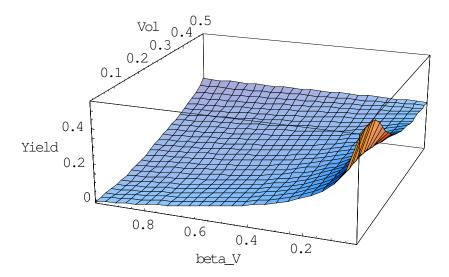


Fig. 15. Effective average yield from the structural model for the sample utility bonds in the period 1989-1998 as a function of asset utility and collection uncertainty.

Our data for average spreads were taken from Bakshi, Madan and Zhang (2000). We took structural data from S&P Industry Survey, which included 47 utilities in 1989-1993 and 68 utilities in 1994-1998. The plot demonstrates average yield for the term (-15 month, +15 month) around average utility bond maturity (100 month) as a function of asset volatility and collection uncertainty. Average yield of our utility sample is 7.8% with  $\sigma$ =14.1%,  $\tau_i$ =21% and  $\beta_V$ =0.523. Here again, we observe that the implied income tax rate is close to the marginal capital gains tax rate.

#### References

Anderson R. W., S. Sundaresan and R. Tychon, 1996, Strategic analysis of contingent claims, *European Economic Review*, 40, 871-881.

Bakshi, G., D. Madan and F. Zhang, 2000, Assessing the potential of alternative credit risk models, Maryland University working paper.

Black, F., and M. Scholes, 1973, The pricing of options and corporate liabilities, *Journal of Political Economy* 81, 637-59.

Black, F., and J. Cox, 1976, Valuing corporate securities: Some effects of bond indenture provisions, *Journal of Finance* 31, 351-367.

Collin-Dufresne, P., and R. Goldstein, 2001, Do credit spreads reflect stationary leverage ratios?, *Journal of Finance*, 56, 1926-1957.

- P. Collin-Dufresne, R. S. Goldstein and J. Spencer Martin, 2001, The determinants of credit spread changes, *Journal of Finance*, 56, 2177-2207.
- S. Das, 2001, *Credit Derivatives and credit linked notes*. (John Wiley & Sons, New York), Chapter 6.
- D. Duffie, and D. Lando, 2001, Term structure of credit spreads with incomplete accounting information. *Econometrica*, 69, 633-664.

Duffie, D. and K. Singleton, 1999, Modeling term structure of defaultable bonds, *Review of Financial Studies*, 12, 687-720.

- J. Ericsson and J. Remby, 2004, An empirical study of structural credit risk models using stock and bond prices, *Journal of Fixed Income*, 14, 38-49.
- F. J. Fabozzi, R. W. Wilson, and R. Todd, Corporate bonds, in F. J. Fabozzi, 2001, *The Handbook of Fixed Income Securities*, McGraw Hill, NY.

Graham, J., 2003, Taxes and corporate finance, *Review of Financial Studies*, 14, 1075-1129.

- J. Huang, and M. Huang, 2002, How much of the corporate-treasury yield spread is due to credit risk?: A new calibration approach. Stanford University working paper.
- M. F. Hellwig, 1981, Bankruptcy, limited liability and the Modigliani-Miller theorem, *The American Economic Review*, 71, 155-170.
- J. C. Hull, 1997, Options, Futures and Other Derivatives, (Prentice Hall, NJ), Chapter 18

J. Hund, 2003, Default probability dynamics in structural models, *Journal of Fixed Income*, 13, 67-79.

Jarrow, R. A. and S. Turnbull, 1995, Pricing options on derivatives securities subject to credit risk, *Journal of Finance*, 50, 53-86.

Jones, E. P., S. Mason, and E. Rosenfeld, 1984, Contingent claims analysis of corporate capital structures: An empirical investigation, *Journal of Finance* 39, 611-625.

S. Liu and C. Wu, 2004, Taxes, default risk and yield spreads, *Journal of Fixed Income*, 14, 71-85.

D. Lando, 2004, *Credit Risk Modeling: Theory and Applications*, (Princeton University Press, Princeton, NJ).

Longstaff F. A. and E. S. Schwartz, 1995, *Journal of Finance*, 50, 789-819.

P. Mella-Barral and W. Perraudin, 1997, Strategic Debt Service, *Journal of Finance*, 52, 531-556.

R. C. Merton, 1974, On the pricing of the corporate debt: The risk structure of interest rates, *Journal of Finance*, 29, 449-470.

R. Parrino, 1997, Spinoffs and wealth transfers: the Marriott case, *Journal of Financial Economics*, 43, 241-274.

M. S. Scholes and M. A. Wolfson, 1992, *Taxes and Business Strategy: A planning approach*, Prentice Hall, NJ.

S&P 1995, Standard and Poors Industry Survey, Vol. 2, M-Z, February, 23, 1995.

S&P 1999, Standard and Poors Industry Survey, Vol. 2, E-L, August, 12, 1999.

Schönbucher, Philip, 1998, Term structure modeling of defaultable bonds, *Review of Derivatives Research*, 2, 161-192.