

FX Pricing: Regulatory Requirements & The Challenge of Ultimate Drill-down

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New York, NY

R in Finance 2013

Saturday, 2013-05-18

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Motivation?

- ▶ **Model Risk**

Motivation?

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If you haven't heard about this:

Fed SR 11-7: Supervisory Guidance on Model Risk Management

SR Letter 11-7
Attachment

Board of Governors of the Federal Reserve System
Office of the Comptroller of the Currency

April 4, 2011

SUPERVISORY GUIDANCE ON MODEL RISK MANAGEMENT

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I. INTRODUCTION

Banks rely heavily on quantitative analysis and models in most aspects of financial decision making.¹ They routinely use models for a broad range of activities, including underwriting credits, valuing exposures, instruments, and positions, measuring risk, managing and safeguarding client assets, determining capital and reserve adequacy, and many other activities. In recent years, banks have applied models to more complex products and with more ambitious scope, such as enterprise-wide risk measurement, while the markets in which they are used have also broadened and changed. Changes in regulation have spurred some of the recent developments, particularly the U.S. regulatory capital rules for market, credit, and operational risk based on the framework developed by the Basel Committee on Banking Supervision. Even apart from these regulatory considerations, however, banks have been increasing the use of data-driven, quantitative decision-making tools for a number of years.

The expanding use of models in all aspects of banking reflects the extent to which models can improve business decisions, but models also come with costs. There is the direct cost of devoting resources to develop and implement models properly. There are also the potential indirect costs of relying on models, such as the possible adverse consequences (including financial loss) of decisions based on models that are incorrect or misused. Those consequences should be addressed by active management of model risk.

¹ Unless otherwise indicated, *banks* refers to national banks and all other institutions for which the Office of the Comptroller of the Currency is the primary supervisor, and to bank holding companies, state member banks, and all other institutions for which the Federal Reserve Board is the primary supervisor.

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then you may not remember. . .

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this:

INDEX:SPX 1499.24 ▼ -3.72 (-0.25%) Open: 1426.19 High: 1503.26 Low: 1426.19 Close: 1499.24
January 28, 2013



Source: TradingView.com

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If you haven't heard about this:

Fed SR 11-7: Supervisory Guidance on Model Risk Management
nor this:

Business Financial Markets

posted: 2 months ago

CON

JPMorgan Tells SEC New VaR Model Didn't Require Prior Disclosure As Whale Impact Fades

JPMorgan Chase, facing criticism that it misled investors about a change to a risk model as trades backfired last year, told U.S. regulators that the bank wasn't obligated to disclose the move until May.

Bloomberg reports that while there was an 'interim change' to the lender's so-called value-at-risk model during the first three months of 2012, that adjustment had been reversed by the time the company filed its quarterly report in May, then-Chief Financial Officer Douglas Braunstein told the Securities and Exchange Commission in a December 3rd letter that was released Wednesday.

'As a result, the firm believes there was no model change within the meaning of' securities-disclosure laws, he wrote.



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To the N^{th} degree

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Now we're talking!

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Go on : I dare you!

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Now we're talking!

- ▶ **Let's see what “document” means for something that's simple. . .**

The Humble Exchange of Currency Notionals

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- ▶ Seems innocuous?

$$V = e^{-rT}(F - K) \times N$$

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from Hull

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- ▶ How do I price a book: with different currencies?

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- ▶ How do I price a book: with different currencies? and different maturities?
- ▶ What are the risk sensitivities?

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- ▶ How do I price a book: with different currencies? and different maturities?
- ▶ What are the risk sensitivities? Of the instrument?

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- ▶ How do I price a book: with different currencies? and different maturities?
- ▶ What are the risk sensitivities? Of the instrument? Of the book?
- ▶ Do all desks price the same way?

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- ▶ How do I price a book: with different currencies? and different maturities?
- ▶ What are the risk sensitivities? Of the instrument? Of the book?
- ▶ Do all desks price the same way? Why not?

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- ▶ How do I price a book: with different currencies? and different maturities?
- ▶ What are the risk sensitivities? Of the instrument? Of the book?
- ▶ Do all desks price the same way? Why not? Ignoring the fact that instruments are OTC, identical contracts on different desks should be priced identically.

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- ▶ What are the risk sensitivities? Of the instrument? Of the book?
- ▶ Do all desks price the same way? Why not? Ignoring the fact that instruments are OTC, identical contracts on different desks should be priced identically.
- ▶ That's a pretty tall order

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Avoiding Arbitrage: The Domestic Argument

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Using Equation 2, i.e., we take valuation and/or P&L in USD—hence “domestic”:

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USD 1 will grow to USD $1 \times e^{r_d T}$ at maturity, T

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Using Equation 2, i.e. we take valuation and/or P&L in USD—hence “domestic”:

$$\underbrace{S_0}_{\text{CCYUSD}}, \text{ where } \text{CCYUSD} = \frac{\text{USD}}{\text{CCY}} = \frac{\text{Units of USD}}{1 \times \text{Unit of CCY}}$$

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(5)

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(6)

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What you pay at T : $\downarrow N^C$ (in units of CCY)

$$C_{T, \text{REALIZED}}^{\$, \text{SHORT}} = N^C \times \underbrace{(K - S_T)}_{\text{CCYUSD}} \quad (12)$$

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The cash flow in USD that occurs at maturity T is:

$$\boxed{C_{T,\text{REALIZED}}^{\$} = \pm N^C \times \underbrace{(S_T - K)}_{\text{CCYUSD}}} \quad (17)$$

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This is the fair value $V_{t,T-t}$ intrinsic to the contract

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But is it?

No Free Lunch

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If this were not the case you could make money by parking your cash in a foreign bank

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Perhaps in Cyprus?

Expressions for the Fair Value (CCYUSD)

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by rearranging terms in Equation (25)

- The dependencies are expressed most explicitly as:

Expressions for the Fair Value (CCYUSD)

- $S_t, F_{t,T-t}, K$ quoted as CCYUSD

$$V_{t,T-t}^{\$} \Leftrightarrow V^{\$(T-t, S_t, K, r_d, r_f)} = \pm N^C \times e^{-r_d(T-t)} \times (\mathbb{E}_t[S_T] - K) \quad \text{from Equation (??)} \quad (22)$$

$$= \pm N^C \times e^{-r_d(T-t)} \times (F_{t,T-t} - K) \quad \text{from Equation (19)} \quad (23)$$

$$= \pm N^C \times e^{-r_d(T-t)} \times (S_t + f_{t,T-t} - K) \quad \text{from Equation (8)} \quad (24)$$

$$= \pm N^C \times e^{-r_d(T-t)} \times (S_t e^{(r_d - r_f)(T-t)} - K) \quad \text{from Equation (5)} \quad (25)$$

$$= \pm N^C \times (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)})$$

by rearranging terms in Equation (25)

- The dependencies are expressed most explicitly as:

$$V_{t,T-t}^{\$} \Leftrightarrow V^{\$(T-t, S_t, K, r_d, r_f)} = \pm N^C \times \underbrace{\left(S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)} \right)}_{\text{CCYUSD}} \quad (27)$$

Sensitivity to FX spot (CCYUSD)

Sensitivity to FX spot (CCYUSD)

$$\begin{aligned}\Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial S_t} \Delta S \\&= \frac{\partial}{\partial S_t} \left(\pm N^C \times (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \right) \Delta S \\&= \pm N^C \times e^{-r_f(T-t)} \Delta S\end{aligned}\tag{28}$$

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

Sensitivity to FX spot (CCYUSD)

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

$$\begin{aligned}\Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(S_t + \Delta S) - V_{t,T-t}^{\$}(S_t) \\&= \pm N^C \times \left(((S_t + \Delta S) e^{-r_f(T-t)} - K e^{-r_d(T-t)}) - (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \right) \\&= \pm N^C \times e^{-r_f(T-t)} \Delta S\end{aligned}\tag{29}$$

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$$\begin{aligned}\Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(S_t + \Delta S) - V_{t,T-t}^{\$}(S_t) \\&= \pm N^C \times \left((S_t + \Delta S) e^{-r_f(T-t)} - K e^{-r_d(T-t)} \right) - (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \\&= \pm N^C \times e^{-r_f(T-t)} \Delta S\end{aligned}\tag{29}$$

where $V_{t,T-t}^{\$}(S_t + \Delta S) - V_{t,T-t}^{\$}(S_t)$ means perturb only S_t in $V_{t,T-t}^{\$} \Leftrightarrow V^{\$}(T-t, S_t, K, r_d, r_f)$

Sensitivity to FX spot (CCYUSD)

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

$$\begin{aligned}\Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(S_t + \Delta S) - V_{t,T-t}^{\$}(S_t) \\&= \pm N^C \times \left((S_t + \Delta S) e^{-r_f(T-t)} - K e^{-r_d(T-t)} \right) - (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \\&= \pm N^C \times e^{-r_f(T-t)} \Delta S\end{aligned}\tag{29}$$

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From both approaches we have:

Sensitivity to FX spot (CCYUSD)

$$\begin{aligned}
 \Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial S_t} \Delta S \\
 &= \frac{\partial}{\partial S_t} \left(\pm N^C \times (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \right) \Delta S \\
 &= \pm N^C \times e^{-r_f(T-t)} \Delta S
 \end{aligned} \tag{28}$$

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$$\begin{aligned}
 \Delta V_{t,\text{SPOT}}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(S_t + \Delta S) - V_{t,T-t}^{\$}(S_t) \\
 &= \pm N^C \times \left((S_t + \Delta S) e^{-r_f(T-t)} - K e^{-r_d(T-t)} - (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \right) \\
 &= \pm N^C \times e^{-r_f(T-t)} \Delta S
 \end{aligned} \tag{29}$$

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From both approaches we have:

$$\Delta V_{t,\text{SPOT}}^{\$} = \pm N^C \times e^{-r_f(T-t)} \Delta S$$

(30)

Sensitivity to Domestic Spot Zero-Rate (CCYUSD)

Sensitivity to Domestic Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_d}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_d} \Delta r \\&= \frac{\partial}{\partial r_d} \left(\pm N^C \times \left(S_t e^{-r_d(T-t)} - K e^{-r_d(T-t)} \right) \right) \Delta r \\&= \pm N^C \times K(T-t) e^{-r_d(T-t)} \Delta r \\&\approx \pm N^C \times K(T-t) (1 - r_d(T-t)) \Delta r \\&= \pm N^C \times \left(K(T-t) \Delta r - \underbrace{r_d(T-t)^2 \Delta r}_{\approx 0} \right) \\&\approx \pm N^C \times K(T-t) \Delta r\end{aligned}\tag{31}$$

Sensitivity to Domestic Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_d}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_d} \Delta r \\ &\approx \pm N^C \times K(T - t) \Delta r\end{aligned}\tag{31}$$

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

Sensitivity to Domestic Spot Zero-Rate (CCYUSD)

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

$$\begin{aligned}\Delta V_{t,r_d}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(r_d + \Delta r) - V_{t,T-t}^{\$}(r_d) \\ &\approx \pm N^c \times K(T-t) \Delta r\end{aligned}\tag{32}$$

From both approaches we have:

Sensitivity to Domestic Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_d}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_d} \Delta r \\ &\approx \pm N^c \times K(T-t) \Delta r\end{aligned}\tag{31}$$

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From both approaches we have:

$$\boxed{\Delta V_{t,r_d}^{\$} = \pm N^c \times K(T-t) \Delta r}\tag{33}$$

Sensitivity to Foreign Spot Zero-Rate (CCYUSD)

Sensitivity to Foreign Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_f}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_f} \Delta r \\&= \frac{\partial}{\partial r_f} \left(\pm N^C \times (S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)}) \right) \Delta r \\&= \pm N^C \times \left(-S_t (T-t) e^{-r_f(T-t)} \Delta r \right) \\&\approx \pm N^C \times \left(-S_t (T-t) (1 - r_f(T-t)) \Delta r \right) \\&= \pm N^C \times \left(-S_t (T-t) \Delta r - \underbrace{r_f (T-t)^2 \Delta r}_{\approx 0} \right) \\&\approx \pm N^C \times -S_t (T-t) \Delta r\end{aligned}$$

Sensitivity to Foreign Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_f}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_f} \Delta r \\ &\approx \pm N^c \times -S_t(T-t) \Delta r\end{aligned}$$

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

$$\begin{aligned}\Delta V_{t,r_f}^{\$} &\stackrel{\text{def}}{=} V_{t,T-t}^{\$}(r_f + \Delta r) - V_{t,T-t}^{\$}(r_f) \\ &\approx \pm N^C \times -S_t(\Delta r(T-t))\end{aligned}$$

From both approaches we have:

Sensitivity to Foreign Spot Zero-Rate (CCYUSD)

$$\begin{aligned}\Delta V_{t,r_f}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial r_f} \Delta r \\ &\approx \pm N^C \times -S_t(T-t) \Delta r\end{aligned}$$

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Sensitivity to Tenor (CCYUSD)

Sensitivity to Tenor (CCYUSD)

$$\begin{aligned}
 \Delta V_{t,\tau}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial \tau} \Delta \tau \\
 &= \frac{\partial}{\partial \tau} \left(\pm N^C \times (S_t e^{-r_f \tau} - K e^{-r_d \tau}) \right) \Delta \tau \\
 &= \pm N^C \times \left(-r_f S_t e^{-r_f \tau} + r_d K e^{-r_d \tau} \right) \Delta \tau \\
 &\approx \pm N^C \times \left(-r_f S_t (1 - r_f \tau) + r_d K (1 - r_d \tau) \right) \Delta \tau \\
 &= \pm N^C \times \left(-r_f S_t \Delta \tau + \underbrace{r_f^2 S_t \tau \Delta \tau}_{\approx 0} + r_d K \Delta \tau - \underbrace{r_d^2 K \tau \Delta \tau}_{\approx 0} \right) \\
 &\approx \pm N^C \times \left(-r_f S_t \Delta \tau + r_d K \Delta \tau \right)
 \end{aligned}$$

Sensitivity to Tenor (CCYUSD)

$$\begin{aligned}\Delta V_{t,\tau}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial \tau} \Delta \tau \\ &\approx \pm N^c \times \left(-r_f S_t \Delta \tau + r_d K \Delta \tau \right)\end{aligned}$$

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

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$$\begin{aligned}\Delta V_{t,\tau}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial \tau} \Delta \tau \\ &\approx \pm N^c \times \left(-r_f S_t \Delta \tau + r_d K \Delta \tau \right)\end{aligned}$$

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Alternatively, we could perturb $V_{t,T-t}^{\$}$ directly:

$$\begin{aligned}\Delta V_{t,\tau}^{\$} &\stackrel{\text{def}}{=} V_{t,\tau}^{\$}(\tau + \Delta \tau) - V_{t,\tau}^{\$}(\tau) \\ &\approx \pm N^c \times \left(-r_f S_t \Delta \tau + r_d K \Delta \tau \right)\end{aligned}$$

From both approaches we have:

Sensitivity to Tenor (CCYUSD)

$$\begin{aligned}\Delta V_{t,\tau}^{\$} &\stackrel{\text{def}}{=} \frac{\partial V_t^{\$}}{\partial \tau} \Delta \tau \\ &\approx \pm N^c \times \left(-r_f S_t \Delta \tau + r_d K \Delta \tau \right)\end{aligned}$$

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From both approaches we have:

$$\boxed{\Delta V_{t,\tau}^{\$} = \pm N^c \times \left(-r_f S_t + r_d K \right) \Delta \tau} \quad (35)$$

The FX Forward Contract (CCYUSD)

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$$V_{t,T-t}^{\$} \Leftrightarrow V^{\$}(T-t, S_t, K, r_d, r_f) = \pm N^c \times \underbrace{\left(S_t e^{-r_f(T-t)} - K e^{-r_d(T-t)} \right)}_{\text{CCYUSD}}$$

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$$\Delta V_{t,\text{SPOT}}^{\$} = \pm N^C \times e^{-r_f(T-t)} \Delta S$$

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$$\Delta V_{t,\text{SPOT}}^{\$} = \pm N^C \times e^{-r_f(T-t)} \Delta S$$

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$$\Delta V_{t,\text{SPOT}}^{\$} = \pm N^C \times e^{-r_f(T-t)} \Delta S$$

$$\Delta V_{t,r_d}^{\$} = \pm N^C \times K(T-t) \Delta r$$

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$$\Delta V_{t,\tau}^{\$} = \pm N^C \times \left(-r_f S_t + r_d K \right) \Delta \tau$$

The FX Forward Contract (USDCCY)

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$$V_{t,T-t}^C \Leftrightarrow V^C(T-t, S_t, K, r_d, r_f) = \mp N^{\$} \times \underbrace{\left(S_t e^{-r_d(T-t)} - K e^{-r_f(T-t)} \right)}_{\text{USDCCY}}$$

The FX Forward Contract (USDCCY)

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$$\Delta V_{t,\text{SPOT}}^C = \mp N^{\$} \times e^{-r_d(T-t)} \Delta S$$

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$$\Delta V_{t,\text{SPOT}}^C = \mp N^{\$} \times e^{-r_d(T-t)} \Delta S$$

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The FX Forward Contract (USDCCY)

$$V_{t,T-t}^C \Leftrightarrow V^C(T-t, S_t, K, r_d, r_f) = \mp N^{\$} \times \underbrace{\left(S_t e^{-r_d(T-t)} - K e^{-r_f(T-t)} \right)}_{\text{USDCCY}}$$

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$$\Delta V_{t,r_f}^C = \mp N^{\$} \times K(T-t) \Delta r$$

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$$\Delta V_{t, \text{SPOT}}^C = \mp N^{\$} \times e^{-r_d(T-t)} \Delta S$$

$$\Delta V_{t, r_d}^C = \mp N^{\$} \times -S_t (T-t) \Delta r$$

$$\Delta V_{t, r_f}^C = \mp N^{\$} \times K (T-t) \Delta r$$

$$\Delta V_{t, \tau}^C = \mp N^{\$} \times \left(-r_d S_t + r_f K \right) \Delta \tau$$

The End is Nigh!

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- ▶ We're done!

The End is Nigh!

- ▶ We're done! Right?

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- ▶ We're done! Right?
- ▶ **Nah, ah, ah!**



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The End is Nigh!

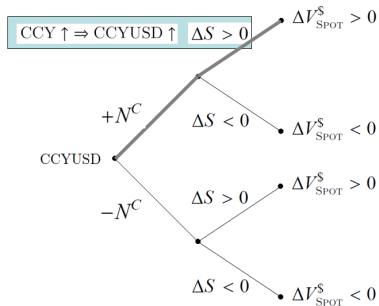
- ▶ We're done! Right?
- ▶ **Nah, ah, ah!**
- ▶ How 'bout then perturbations?
- ▶ Where does r_d come from?
- ▶ Where does r_f come from?
- ▶ Does any of this stuff actually work?

The End is Nigh!

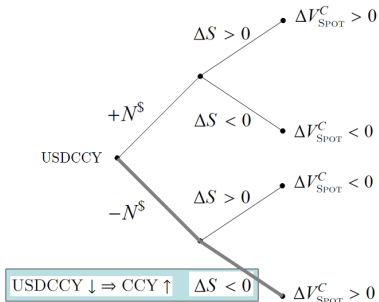
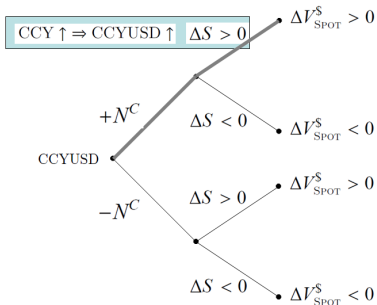
- ▶ We're done! Right?
- ▶ **Nah, ah, ah!**
- ▶ How 'bout then perturbations?
- ▶ Where does r_d come from?
- ▶ Where does r_f come from?
- ▶ Does any of this stuff actually work?
- ▶ That's a pretty tall order

Perturbing Spot: Directionality

Perturbing Spot: Directionality



Perturbing Spot: Directionality



No means No (Arbitrage)!

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- ▶ The observables in the market are S_t and $f_{t,T-t}$ (and therefore $F_{t,T-t}$, by Equation (8))

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- ▶ The observables in the market are S_t and $f_{t,T-t}$ (and therefore $F_{t,T-t}$, by Equation (8))
- ▶ Once a contract has been struck, K is also known
- ▶ Curve cooking and interpolating to unknown tenors is an entire discussion unto itself

No means No (Arbitrage)!

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$$\boxed{r_d = r_f - \frac{\log(1 + f_{t,T-t}/S_t)}{T - t}} \quad (38)$$

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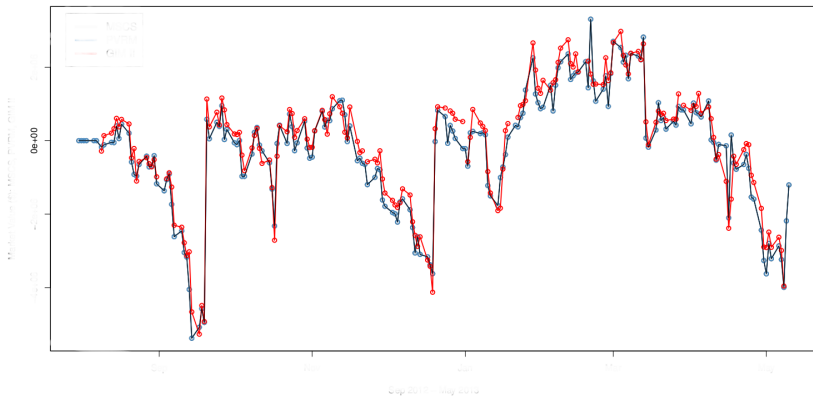
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The End of Mark Deviance

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