Information Frictions and Security Design: Are AAA Investors Less Informed?

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August 26, 2019

Abstract

The design of a security conveys information about its future outcome. In general, a higher level of subordination is predictive of a lower likelihood of downgrade, controlling for security price. However, this information content is affected by two possible frictions. Using documentation quality on private label mortgages to measure the opacity of a given security, I show that opaque deals exhibit less information content about subsequent outcomes. Once this opacity measure is taken into account, subordination of a AAA tranche is no less informative than that of junior tranches.

JEL classification: G21, G24

Keywords: mortgage-backed securities, security design, Gaussian copula, bond prices.

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Information frictions are the main reason why asset pools are tranched prior to the sale to investors. The widespread use of collateralized mortgage obligations (CMOs) attests to the importance of such frictions. Aside from the incipient recovery of private label mortgage markets,¹ tranching has become essential for credit risk transfers from the government-sponsored entities. Indeed Finkelstein, Strzodka, and Vickery (2018) document that Fannie Mae and Freddie Mac have reduced Federal government exposure to credit risk on close to \$1.8tn mortgages by transferring tranches of them to private investors. Yet despite of the importance of credit risk transfer mechanisms in mortgage-backed securities, much remains to be understood about the information frictions that affect such mechanisms. This paper identifies asset opacity as an important determinant of information inherent in mortgage-backed securities and thus contributes to a broader understanding of internal credit enhancement techniques.

Initial security prices are predictive of subsequent bond downgrades. But two frictions taking place between the investor and the originator affect the information content of the securities (Ashcraft and Schuermann, 2008). The first one originates in investor unsophistication, coined by Gorton and Pennacchi (1990). It refers to the self-selection of investors into securities of different risk categories on the basis of their respective levels of information. According to Boot and Thakor (1993), unsophisticated investors seek senior securities which are information-insensitive, e.g. high-rated tranches of an MBS. Informed investors prefer to invest in infomation sensitive bonds, i.e. junior ones, thus gaining the most of their superior information level. This may cause a principal agent problem between the uninformed senior investors and the issuer to which junior bondholders are not exposed. Accordingly, (Adelino, 2009) provides evidence that AAA tranches exhibit an information disadvantage relative to the junior ones, suggesting senior bondholders are relatively unsophisticated.

Another important friction stems from opaque assets in the security. An important source of opacity is the completeness of the documentation provided by the mortgage borrowers. If asset quality cannot be precisely assessed, this can give rise to adverse selection, (Skreta and Veldkamp, 2009).² Frame (2018) reviews the empirical literature on mortgage markets during the crisis, arguing that additional research is required on contracting frictions. The main contribution of this paper is to provide empirical evidence that asset opacity is the primary friction affecting the information content of a security, whereas lack of investor sophistication is secondary.

I measure the opacity of a given securitization deal as the level of documentation completeness on the underlying pool of loans. Thus the opacity that follows from poorly documented loans, unlike the sophistication issue previously described, impacts both the senior and junior bonds equally. This fact allows me to distinguish the information advantage linked to asset opacity (i.e. between high-doc and low-doc deals) from the one linked to investor sophistication as is currently proxied in the literature (i.e. between AAA bonds and others). In a reduced-form specification using bond downgrade as dependent variable, I find that the subordination percentage (i.e. the share of

¹ The non-agency share of residential MBS issuance has increased from 1.8% in 2016 to 7.5% in February 2019, according to Center (2019).

² The adverse selection problem can be related to borrowers fraudulently inflating their income report in "low-doc" loan applications (Ambrose, Conklin, and Yoshida, 2016). In terms of the issuer of the loans, Daley, Green, and Vanasco (2018) show that the existence of external agency ratings can reduce the incentives to conduct due diligence on the quality of the assets. This due diligence burden is passed on to the bond investor.

total capital which is subordinated to the bond in question) of a junior tranche appears to be no more predictive than that of the AAA tranche within low-doc deals. Among full-doc deals, AAA subordination appears no less informative than junior subordination. For deals with intermediate levels of documentation, I recover evidence in line with Adelino (2009) that junior issues contain more information than senior ones. Thus, while the principal-agent problem discussed in earlier literature does take place, it is mediated by the extent of asset opacity affecting the securities.

A bond's yield at issuance and subordination percentage are determined jointly. Between these two, the attribute that is essential in determining the agency rating at issuance is the amount of subordination (IOSCO, 2008). Whereas prior literature has focused on either the security design alone (Begley and Purnanandam, 2017) or prices alone (Adelino, 2009; Ashcraft, Goldsmith-Pinkham, Hull, and Vickery, 2011), I study the information content of mortgage-backed security prices by looking at both price and subordination. The results from a reduced-form specification suggest that the variation in information content is manifested through the subordination structure rather than through price itself. In other words, subordination is predictive of downgrades among full-doc deals but not among low-doc ones.

The reduced-form specification described above does not exhibit collinearity because the relationship between price and subordination is not linear. However, I use this pricing relationship to infer a summary statistic that can substitute price and subordination in the regression. More precisely, I introduce a structural model to infer the default correlation implied by the bond's yield and subordination percentage at issuance. I use a single factor Gaussian copula (Li, 2000), which was arguable the most commonly used pricing model before the crisis. My model takes into account the probability of default and probability of prepayment of the underlying loans to elicit investors' beliefs about default correlations from security prices and subordination percentages. I then use the implied default correlation as a sufficient statistic for yield and subordination in the regressions. The results obtained from this analysis confirm the findings from the reduced-form.

I argue that the main information friction affecting investors in nonagency bond markets is adverse selection, resulting from deal opacity, rather than a principal-agent problem resulting from lack of sophistication. Other papers have considered how the investors mitigate adverse selection. For example, Downing, Jaffee, and Wallace (2009) argue that agency loans sold to special purpose vehicles (SPVs) trade in a market for lemons; bond coupons exhibit a "lemons spread", showing investors are overall aware of the information friction. Adelino, Gerardi, and Hartman-Glaser (2016) argue that investors in the secondary market for loans deal with opacity by skimming the underlying loans, deferring the purchase to better observe their quality. Looking at SEC filings from 234 deals, Begley and Purnanandam (2017) show that investors are aware of the lemons problem they are exposed to, so that opaque deals command more skin in the game, i.e. larger equity tranches, to mitigate the information friction. They focus on the signaling role of the equity tranche about bond outcomes, especially in opaque deals, to provide evidence that investors are

³ Hull and White (2006) called the Gaussian copula "the standard market model for valuing collateralized debt obligations and similar instruments". See also Brunne (2006); D'Amato and Gyntelberg (2005); Duffie and Singleton (2012); Elizalde (2005); Hull and White (2004, 2006, 2008); McGinty, Beinstein, Ahluwalia, and Watts (2004); Tzani and Polychronakos (2008).

aware of the lemons problem. I provide evidence that regardless of investors' awareness of the adverse selection problem they are still subject to its negative information effects.

I document that AAA issuance is increasing in the level of opacity in private label RMBS markets. The results are robust to controlling for risk attributes of the deal. While the size of the equity piece might be increasing in the extent of deal opacity (Begley and Purnanandam, 2017), larger AAA tranches can be an equilibrium response to the issuer having more skin in the game. This reconciles the results of Begley and Purnanandam (2017), that the problem of asymmetric information and adverse selection is understood by investors, with earlier literature arguing that asset opacity in structured security markets leads to rating inflation. Skreta and Veldkamp (2009) derive an equilibrium where ratings are more likely to be inflated when asset quality is opaque. Griffin and Tang (2012) speak of subjective ratings in CDO markets. An, Deng, Nichols, and Sanders (2015) argue that more complex CMBS structures see lower subordination levels.⁴

This paper contributes to a growing literature studying low documentation loans. Begley and Purnanandam (2017) collect information about loan documentation quality from the prospectus of 234 deals, which they retrieve from SEC filings. I use loan level information about documentation completeness to construct a deal level opacity index for a sample of close to 2,500 deals, leading to a sample of over 26,000 tranches. Committee (2007) documents a relative decline in the number of full documentation subprime loans in the running to the crisis. Keys, Mukherjee, Seru, and Vig (2010) argue that the low-doc loans underperformed (in terms of defaults) relative to otherwise similar but better documented loans. This relative underperformance of low-doc loans is confirmed by the results of Begley and Purnanandam (2017) and Kau, Keenan, Lyubimov, and Slawson (2011). Ashcraft, Goldsmith-Pinkham, and Vickery (2010) document the underperformance of low-doc deals. Similarly, Griffin and Maturana (2016) and Piskorski, Seru, and Witkin (2015) provide evidence that misrepresentation of loan features was associated with higher losses. I emphasize investor information about future performance rather than asset performance per se.

Coval, Jurek, and Stafford (2009a) use a Gaussian copula model⁶ to show that security prices are sensitive to underlying default correlations, and that this sensitivity compounds along the structured finance chain. As Cordell, Huang, and Williams (2012) show (see Figure A.1) the underlying collateral of cash CDOs is predominantly mezzanine tranches of CMOs. This implies two things. On one hand, it shows that default correlations in CDO markets should be measured from CMO prices. To my knowledge, mine is the first such measure of default correlations, which is an important complement to the literature on CDO prices.⁷ On the other hand, it shows that CDOs are very sensitive to loan default correlation assumptions, like the CDO² in Coval et al. (2009a).

⁴ Instead in RMBS markets I find no prior evidence documenting this phenomenon. Benmelech and Dlugosz (2010) link rating inflation to rating shopping, but not to asset opacity.

⁵ They find that misrepresentation is a phenomenon affecting low and high documentation loans alike.

⁶ Using their parameters I replicate their results using my model (see Figure A.2).

⁷ Among those, Duffie and Gârleanu (2001) and Duffie and Singleton (2012) discuss the pricing of cash CDOs. Otherwise, the literature has mostly focused on synthetic CDOs and tranches of credit default swap baskets (Andersen and Sidenius, 2004; Andreoli, Ballestra, and Pacelli, 2016; Benešová and Teply, 2010; Brunne, 2006; Buzková and Teply, 2012; Coval, Jurek, and Stafford, 2009b; Elizalde, 2005; D'Amato and Gyntelberg, 2005; Hull and White, 2004, 2006; Longstaff and Rajan, 2008; Schlösser, 2011; Stanton and Wallace, 2011).

The paper proceeds as follows. Section 1 presents the data. Section 2 presents my empirical strategy based on price, coupon and subordination. Section 3 lays out the copula model from which I infer default correlations and copula model estimates. Section 4 replicates the results from Section 2 using implied correlation as the independent variable. Section 5 concludes.

1 Data

Private label securitization data for both loan and bond performance are available from Moody's ABSNet. This proprietary dataset collects monthly information about private label securities from deal trustees, providing snapshots of all tranches inside a given deal between the time of origination and the end of 2016. For each month, ABSNet records rating, subordination, bond maturity and coupon for each tranche. Organizing tranches by subordination levels I derive the detachment point for each one of them.⁸

Collateralized Mortgage Obligations are traded over the counter. I use proprietary data from Thomson Reuters, which records transaction prices from January 2004 onwards. I obtain the full series of prices for CMOs originated before and up to June 2005, i.e., prior to the pre-crisis mortgage boom.⁹ ¹⁰ I check the consistency between the ABSNet price and the mid price in Thomson Reuters. I find a median absolute difference of \$0.06 and a 99th percentile of \$1.51, the gap being consistent with the small time differences in the date of observation across sources.

From the early cohorts, i.e., those originated before June 2005, I observe 35,692 tranches -14 tranches per deal on average- for a total \$1,854.8bn of originated securities (see Table 6). In comparison, Adelino (2009) includes boom-time data to obtain 67,412 securities from JP Morgan's MBS database, a total issue of \$4,204.8bn. I follow his data cleaning procedures such as removing Interest Only, Principal Only, Inverse Floater and Fixed to Variable bonds from the sample. Alt-A and subprime deals are the largest classes (see Table 6). Although the growth of these asset classes mostly happened in the running to the crisis (Gorton, 2009) I find that pre-boom originations are also composed mostly of suprime and alt-A bonds.

Most of the bond volume issued is rated AAA at origination (see Figure A.3).¹¹ Subordination becomes steeper as the rating increases and for second lien/subprime deals. The tranching structure I observe lines up in general with the one Cordell et al. (2012) obtain from Intex data (see Table 7 for a comparison), apart from relatively thicker AAA tranches in my sample.¹²

Changes in subordination percentage take place over the cycle, though mostly for subprime deals, reflecting the effect of defaults and prepayments. This is shown in Figure A.5, which depicts the

⁸ Some deals contain more than one structure, each structure giving rise to its own subordination waterfall. I source each structure separately and treat different structures as if they were different deals.

⁹ See Echeverry, Stanton, and Wallace (2016).

¹⁰ Starting July 2009, ABSNet also started recording bond prices over time, which allows me to cross-check prices across sources by matching on bond CUSIP, year and month, using the nearest transaction to the rating observation date. The average time difference is 1.83 days, the median being 0 and the 99th percentile 53 days.

¹¹ ABSNet provides the Standard & Poor's (S&P) rating. When the security has no S&P rating I use the one issued by Fitch, which uses the same grading scale. Figure 1.2 shows the average subordination percentage by rating at origination.

¹² Rule 144A of the Securities Act of 1933 allows private companies to sell unregistered securities to qualified institutional buyers. Intex contains data on 144A deals, which are not in my sample.

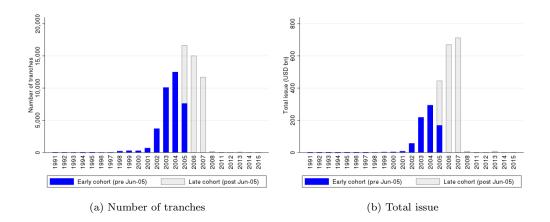


Figure 1.1: Number of tranches and amount issued by vintage year for private label collateralized mortgage obligations. Source: ABSNet bond data. The counts in my estimation sample (early vintages, prior to June 2005) are recorded in blue, while the numbers for late vintage tranches are illustrated in light grey.

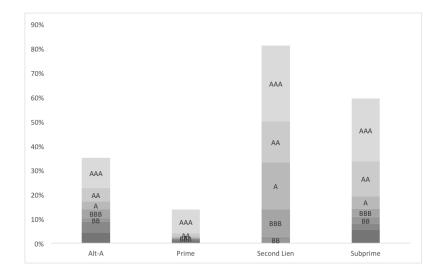


Figure 1.2: Deal structure. Source: ABSNet bond data. For the sample of early vintage deals, I look at the difference in subordination between tranches with consecutive S&P ratings. I then average the outcome by rating and asset type, aggregating at coarse grade level (see mapping in Table 15). This average difference is represented here, stacked by asset type.

point-in-time difference in average subordination between AAA and BBB tranches. While the difference remains close to constant for alt-A and prime deals, the difference rises for subprime deals in the running to the crisis, with a slight downward trend over time afterwards. In summary, among the tranche-level variables I use for the pricing model, i.e., price, coupon and subordination structure, the first two exhibit more cyclical variation than the latter.

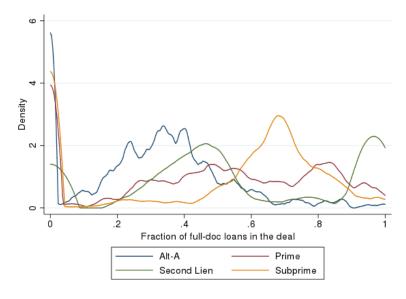
I use origination and monthly performance data on the underlying loans by ABSNet. Loans are linked to their respective deals. I start with a universe of 6,453,799 loans, of which 2,944,014 are originated by 2005. I have loan and borrower characteristics such as FICO score, owner occupancy, loan amount and LTV at issuance, which I will use in Section 3.1 to estimate default and prepayment hazard models.

The loan data provides a documentation completeness indicator for each loan. This is categorized as full, limited, alternative or no documentation. Loans with full documentation provide verification of income as well as assets. Loans with partial documentation provide no information about borrower income but do provide some about their assets. "No-documentation" loans provide no information about income or assets. Figure 1.3 shows a distribution of the deal level share of loans with full documentation in my sample of vintages prior to June 2005. It suggests subprime loans were relatively better documented than alt-A deals, with densities peaking around 0.7 and 0.35 approximately. Prime deals show a higher dispersion in terms of documentation completeness. ¹³ I also check that the distribution of FICO scores does not shift upwards as documentation completeness improves (see Figure A.9) but in fact seems to shift downwards. Something similar happens to the distribution of LTVs over the documentation spectrum. The evidence thus suggests that low-doc is not a proxy for higher credit risk.

Including cases of partial and alternative documentation, I assign a documentation score to each loan (no documentation=0; partial=0.1; alternative=0.3; full=1). In comparison Keys et al. (2010) use percentage of completeness, which is equivalent to excluding the intermediate values from my score. I average documentation scores into a deal level opacity index. The higher this index, the better the documentation on the underlying loans and the less opaque the deal. Figure A.6 presents the averages by asset type and vintage year. Note that alt-A deals, which are typically labeled as low-doc, can only be characterized as such from year 2000 onwards. The downward slope in Figure A.6 reflects the decline in lending standards in the running to the crisis observed on subprime loans by Dell'Ariccia, Igan, and Laeven (2012) and Keys et al. (2010).

Other data include dynamic covariates such as CBSA level home price indices from FHFA and interest rate data; I use the difference between the loan original interest rate from ABSNet and the original ten year Treasury rate from FRED. Using Treasury rates I also compute the coupon gap (the difference between the ten year rate at origination and the current ten year rate). From Bloomberg I extract bond contractual maturities and the weighted average life.

¹³ In comparison, density plots on post-June 2005 issues suggest that documentation completeness deteriorated more among alt-A, second lien and prime deals in the running to the crisis relative to subprime ones.



(a) Originated before June 2005

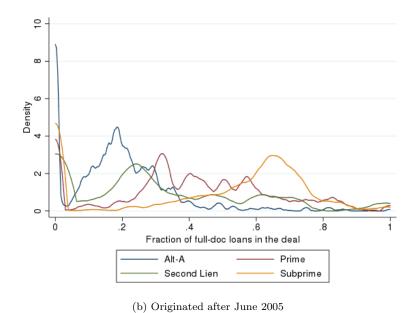


Figure 1.3: Kernel density plot of the distribution of full-documentation loans by deal asset type. For each deal I obtain the percentage of fully documented loans associated to it. The figure represents a kernel density plot of the distribution of deals along this measure. A separate plot on vintages later than June 2005 is provided for comparison.

2 Empirical strategy

I estimate regressions of the form

$$\mathbb{1}\{down_i^{2009}\} = \begin{cases} 1 \text{ if } \alpha + \beta_p price_{i0} + \beta_c coupon_{i0} + \beta_s subord_{i0} + \eta_{rating_{i0}} + \beta X_{i0} + \varepsilon_i \ge 0\\ 0 \text{ otherwise} \end{cases}$$
(1)

where $\mathbb{1}\{down_{i,2009}\}$ is an indicator for bond downgrade by the end of 2009 and $\eta_{rating_{i0}}$ is a series of dummies that indicate the rating of bond i. The error term $\varepsilon_i \mid X_{i0}$ has a logit distribution. The vector X_{i0} contains deal vintage and tranche rating at origination.

Table 1 presents regression results for specification (1). Looking at the full sample in column (1), higher bond price is predictive of a lower probability of downgrade, and a higher percentage subordination has the same effect. Both are significant predictors of downgrades. A higher coupon significantly predicts lower likelihood downgrades (this counterintuitive result only holds for below-AAA bonds as I will show later). Overall Table 1 confirms the findings by Ashcraft et al. (2011) that bond prices contain information about bond performance which is not captured by the agency ratings.

To interact bond seniority with deal opacity I split the sample by value of the documentation index derived in Section 1 for each deal, using four buckets of width 0.25 each. The results, shown in columns (2)-(5) of Table 1, show that the effect most clearly driven by documentation quality is that of subordination percentage: the corresponding regression coefficient decreases from insignificant for the lowest documentation bucket to negative and significant for the highest one.

	(1) All	(2) $[0, 0.25)$	(3) $[0.25, 0.5)$	(4) $[0.5, 0.75)$	(5) [0.75, 1]
Price	-0.0187***	-0.0159*** (0.00606)	-0.0200***	-0.0110*** (0.00267)	-0.0169*** (0.00254)
Coupon	(0.00151) $-0.142**$ (0.0178)	-0.123*** (0.0640)	(0.00333) -0.0380 (0.0304)	(0.00207) -0.117^{***} (0.0441)	(0.00354) -0.0780^* (0.0466)
Subordination	-3.130*** (0.268)	0.00163 (0.864)	(0.0504) $-1.857***$ (0.657)	-4.016*** (0.489)	-5.722^{***} (0.943)
Observations	26,242	2,489	5,513	7,073	5,049
Rating at first transaction	Y	Y	Y	Y	Y
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y

Standard errors in parentheses

Table 1: Regression results from running logit specification (1) by maximum likelihood, controlling for vintage year, for vintages up to June 2005. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include price, subordination, coupon and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the documentation index corresponding to the given deal. Errors are clustered at deal level.

Comparing the subsample of AAA bonds and the rest, which I do in Table 2, I find that both AAA bonds and junior ones follow the pattern previously outlined. While the effect of price is always

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

negative and significant and that of coupon depends on whether the bond is AAA at origination, the effect of subordination depends on the quality of documentation on the underlying loans as measured by the opacity index. In order to weigh the relative contribution of these different components I will price the bonds using a Gaussian copula model. The outcome of the pricing model, namely the implied correlation, works as a summary statistic of the variables considered so far.

	(1)	(2)	(3)	(4)	(5)
	All	[0, 0.25)	[0.25, 0.5)	[0.5, 0.75)	[0.75, 1]
			AAA only		
Price	-0.0457***	-0.0352***	-0.0360***	-0.0347***	-0.0539***
	(0.00299)	(0.00900)	(0.00529)	(0.00632)	(0.0127)
Coupon	-0.0365	0.0508***	0.0546	0.0919	0.118*
	(0.0245)	(0.0161)	(0.0451)	(0.0575)	(0.0625)
Subordination	-3.944***	-0.0174	-2.774**	-2.014	-9.907***
	(0.565)	(1.622)	(1.229)	(1.881)	(3.612)
Observations	14,034	1,325	3,073	3,272	2,926
Rating at first transaction	N/A	N/A	N/A	N/A	N/A
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y
			Below AAA		
Price	-0.00932***	-0.0163**	-0.0129***	-0.00786***	-0.0113***
	(0.00149)	(0.00714)	(0.00371)	(0.00250)	(0.00358)
Coupon	-0.184***	-0.367***	-0.167***	-0.201***	-0.156***
	(0.0240)	(0.102)	(0.0475)	(0.0529)	(0.0603)
Subordination	-3.978***	-0.309	-2.648***	-4.501***	-4.193***
	(0.310)	(1.881)	(0.880)	(0.538)	(0.784)
Observations	12,206	1,038	2,248	3,757	2,111
Rating at first transaction	Y	Y	Y	Y	Y
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y

Standard errors in parentheses

Table 2: Regression results from running logit specification (1) by maximum likelihood, controlling for vintage year, for vintages up to June 2005. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include price, subordination, coupon and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the documentation index corresponding to the given deal. Errors are clustered at deal level.

The results from Table 2 confirm the results of Adelino (2009) that the information content in coupons is a priori less significant for AAA tranches. However, looking at all pricing measures (bond price, coupon and subordination) shows that the AAA distinction is capturing less about differences in information between investors than the documentation completeness index.

Higher subordination accurately predicts a lower probability of downgrade for deals backed by full-doc loans. The evidence shows an increase in significance and magnitude for the role of subordination as deals go from the bucket of highest opacity to that of lowest opacity. Because higher coupons seem predictive of a higher probability of downgrade for AAA bonds but not

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

for others, I introduce a pricing model implemented by Brunne (2006). Its outcome of the pricing model (the implied default correlation) will act as a summary statistic of the three pricing measures considered so far (price, coupon and subordination) and claridy the findings of the empirical strategy.

3 Implied correlation as a summary measure

In this section I derive a pricing equation where the key parameter is the loan default correlation. I use the asymptotic single risk factor model implemented by the IRB approach in Basel II. Credit risk in this basic framework has two components, systematic and idiosyncratic, where correlation is captured by joint dependence on the realization of the systematic factor (Crouhy, Galai, and Mark, 2000). I use a Large Homogeneous Gaussian Copula (LHGC) model (Brunne, 2006; D'Amato and Gyntelberg, 2005; Duffie and Singleton, 2012; Elizalde, 2005; McGinty et al., 2004; Tzani and Polychronakos, 2008). 1415

In the LHGC setup two assumptions apply. The first one is that all loans in a given pool have the same probability of default PD and the same loss given default LGD, where both PD and LGD are known. The second assumption is homogeneity, which allows us to normalize individual loan size to one. Consider a pool of N mortgages. Default times $\tau = \tau_1, \ldots, \tau_N$ are correlated random variables, where correlation is captured by the loading on an exogenous, normally distributed factor S. In the one-factor model, the individual default probability is given by

$$p(s,T) := Pr(\tau \le T | S = s) = \Phi\left(\frac{\Phi^{-1}(PD) - \sqrt{\rho}s}{\sqrt{1 - \rho}}\right). \tag{2}$$

In equation (2), PD is the unconditional default probability and $\rho \in [0,1)$, the implied default correlation, is the parameter to be estimated from the pricing model. Note that if $\rho = 0$ then the conditional distribution of defaults is exactly the unconditional distribution. As ρ approaches one the opposite happens, namely that the conditional distribution is fully determined by the value of s and so defaults are fully correlated.

Defaults are conditionally independent given the realization of the systematic factor S, i.e.

$$Pr(\tau_1 \le t, \dots, \tau_N \le t | S = s) = \prod_{k=1}^{N} Pr(\tau_k \le t | S = s)$$

which greatly simplifies pricing computations. Total losses from the pool accumulate over time to

$$l(t) = \frac{1}{N} \sum_{k=1}^{N} LGD \mathbb{1}_{(\tau_k \le t)}.$$

¹⁴ Following Li (2000) the Gaussian copula offered a conceptually simple framework for pricing structured securities, which made its use widespread. The model was also used for risk management, which Jarrow (2011) shows is inappropriate. The inappropriate use of copulas is blamed for a surge in investor overconfidence and eventually set the stage for the financial crisis in 2007. See Felix Salmon, *Recipe for Disaster: the Formula that Killed Wall Street* (https://www.wired.com/2009/02/wp-quant/).

¹⁵ Duffie and Gârleanu (2001) and Coval et al. (2009a) look at the sensitivity of expected recovery to default correlation in a Gaussian copula model. Figure A.2 replicates the exercise in Coval et al. (2009a) by plotting expected recovery for each value of ρ , normalized by the value corresponding to $\rho = 20\%$.

Losses are distributed as they happen along the tranches from the deal, affecting first the junior ones and then the senior ones. A tranche's position in the deal is characterized by its attachment and detachment points a and b, where $0 \le a < b \le 1$. The tranche notional is a proportion b-a of the total pool notional N. The losses borne by this tranche are given by

$$l_{[a,b]}(t) = \frac{[l(t)-a]^+ - [l(t)-b]^-}{b-a}.$$

The normality assumption yields the following estimate of expected losses within the [a, b] tranche by payment date T_i :

$$E[l_{[a,b]}(T_i)] = \frac{1}{b-a} \int_{-\infty}^{\infty} \frac{e^{-s^2/2}}{\sqrt{2\pi}} \left([LGD \ p(s,T_i) - a]^+ - [LGD \ p(s,T_i) - b]^+ \right) ds \tag{3}$$

Using payment dates $0 < T_1 < \cdots < T_m = T$ (where T is the maturity of the security), write

$$\frac{V_{[a,b]}}{N(b-a)} = c \sum_{i=1}^{m} B(0,T_i) \Delta(T_{i-1},T_i) (1 - l_{[a,b]}(T_i)). \tag{4}$$

Formula (4) equates security value to the sum of two terms: the discounted cash flows from coupon payments and the residual value (after accounting for defaults) of principal outstanding. Here $B(t_1, t_2)$ discounts a payoff at t_2 to t_1 , c denotes the tranche coupon and $\Delta(T_{i-1}, T_i)$ is the time difference between two payment dates (for mortgage bonds I use $\Delta(T_{i-1}, T_i) \equiv 1/12$). The bond pricing equation is then $pN(b-a) = E[V_{[a,b]}]$. Writing $e_i^{[a,b]} = E[1 - l_{[a,b]}(T_i)]$ the following holds at origination:¹⁶

$$p_0 = c \sum_{i=1}^{m} B(0, T_i) \Delta(T_{i-1}, T_i) e_i^{[a,b]}$$
(5)

The pool is exposed to prepayment risk. As prepayments take place the coupon rate is applied to the balance outstanding, while the prepaid amount is allocated across tranches. In the absence of prospectus information about the order of the cashflows for each specific deal, I make the simplifying assumption that prepayments are uniformly distributed across tranches.¹⁷ This yields

$$p_t = \sum_{i=t+1}^{m} B(t, T_i) e_i^{[a,b]} \prod_{k=t+1}^{i-1} (1 - SMM_k) \left(\underbrace{c\Delta(T_{i-1}, T_i)(1 - SMM_i)}_{\text{coupon payment}} + \underbrace{SMM_i}_{\text{prepaid principal}} \right)$$
(6)

where SMM_k is the single month mortality rate at time k, and is given by the prepayment speed model. Given the unconditional default probability PD, the recovery rate RR and prepayment rate SMM_k , pricing equation (6) pins down a value of ρ , the market estimate of default correlation

 $^{^{16}}$ Note that formula (6) implies that default occurs immediately after the following period payment.

¹⁷ Duffie and Singleton (2012) discuss two prioritization schemes, uniform and fast. Both imply prepayment cash flows are sequential over seniorities. In the absence of deal-level information about the allocation of prepayments, I assume no prioritization. However, many subprime-backed MBS structures had prepayment cashflows going first to the senior tranches, then to junior ones. The purpose is to give the senior tranches a higher credit quality. Because of prepayment penalties, this a priori loss of precision on prepayment cashflow allocation is actually not significant.

for the given pool of loans. Note that expression (2) is only defined for $\rho \in [0,1)$ and thus the existence of a solution to equation (6) is not guaranteed to fall within the unit interval for an arbitrary choice of p and c. So instead of solving equation (6), I solve the minimization problem

$$min_{\rho \in [0,1)} \left| p_t - \sum_{i=t+1}^m B(t, T_i) e_i^{[a,b]} \prod_{k=t+1}^{i-1} (1 - SMM_k) \left(c\Delta(T_{i-1}, T_i) (1 - SMM_i) + SMM_i \right) \right|$$
(7)

Solving equation 7 gives the market estimate of default correlations that I now compute on the panel of security prices.

3.1 Model parameters: default and prepayment

The pricing model focuses on expected losses (EL). Equation (3) uses the identity $EL = PD \times LGD$, which implies both factors must be based on the same definition of default. Since recoveries in my data are based on liquidated values, I use date of liquidation as the default event. Figure A.7 shows an increase in cumulative liquidation rates in the running to the crisis, though the trend is only upward sloping from 2005 vintages onward. Alt-A default rates were roughly half those of subprime deals until early 2005, when both rates soared in the running to the crisis. By 2008, securitization issuance have collapsed. One difference is that while the 90+ delinquency rate they report remains lower for alt-A deals, I find that their cumulative liquidation rate, initially similar to that of prime deals, caught up with that of subprime ones in the running to the crisis.

From loan loss event data I compute LGDs at the deal level (see Figure A.8 for a count of observations by vintage and asset type). Figure A.11 shows that LGD was nearly monotonically increasing from 1990 to 2007, except for a peak in 1996, so that investors may have been adjusting their expectations of LGD over the cycle. However, for LGDs to be computed the full post-workout must have been observed, which usually takes a substantial observation time after default. I apply the common assumption of constant LGD using the long run average on my sample of 60% that is also typically assumed in the literature (Altman, 2006; Brunne, 2006; Coval et al., 2009b; Hull and White, 2004, 2008).

Investors' beliefs about default rates are elicited with a regression model establishing the likelihood of default as a function of loan covariates and estimated on default history. For prepayment speeds I use a proportional hazard model over the first 60 months of the life of the loan. I use a separable hazard model, treating observations representing default as censored as in Palmer (2015) and Liu (2016). Default and prepayment are termination reasons happening at a random time τ^{term} , for termination cause $term \in \{default, prepayment\}$. The intensity of τ is given by equation (8).

$$\lambda_i^{term}(t) = \lim_{\epsilon \to 0} \frac{Pr_i(t - \epsilon < \tau^{term} \le t \mid t - \epsilon < \tau^{term}, X)}{\epsilon}.$$
 (8)

¹⁸ Models of LGD with incomplete workouts, like Rapisarda and Echeverry (2013), were far from the norm, especially in the running to the crisis.

In equation (8), i denotes loan and t denotes time after origination. The density function in equation (8) is modeled as

$$\frac{\lambda_i^{term}(t)}{\lambda_0^{term}(t)} = \exp(X_{it}'\beta^{term}) \tag{9}$$

where $\lambda_0^{term}(t)$ is the baseline hazard function that depends only on the time since origination t. Covariates in X_{it} include loan attributes like loan amount, coupon gap relative to 10 year constant maturity Treasury, LTV and prepayment penalty indicator. It also includes borrower characteristics like FICO score and owner occupancy, as well as variables at the CBSA level such as home price appreciation and unemployment rate.

To estimate the continuous time model specified in equation (8) on discrete time data, I accumulate the intensity process λ over time intervals per equation (10).

$$Pr_i(t < \tau^{term} \mid t - 1 < \tau^{term}) = \exp\left(-\int_{t-1}^t \lambda_i^{term}(u) du\right)$$
 (10)

This leads to the complementary log-log specification

$$Pr_i(t < \tau^{term} \mid t - 1 < \tau^{term}) = \exp(-\exp(X'_{it}\beta^{term})\lambda_0^{term}(t)). \tag{11}$$

I estimate specification (11) with months since origination fixed effects to obtain the hazard functions. I document the results in Table 9 and plot the resulting prepayment rates in Figure 3.1. I find that adjustable rate mortgages are both more likely to default and to prepay than fixed rate types. Subprime loans are the asset type most likely to default. In terms of prepayment hazard, there is no significant difference across asset types other than prime loans being less subject to prepayment than other types.

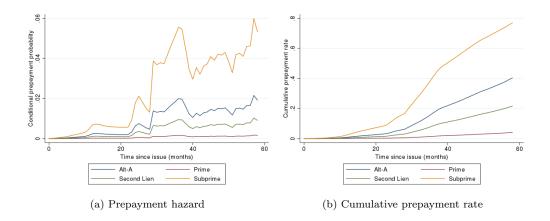


Figure 3.1: Marginal and cumulative prepayment rates implied from the model (11), as summarized in Table 10. Using loan covariates at origination, prepayment hazard rates are computed at the loan level. Averages are computed by asset type and month after origination and plotted here.

I now compare the results from Table 9 with the ones obtained by Liu (2016), who uses the same model to estimate default and prepayment hazard rates on agency loans.¹⁹ On one hand, we document the same sign for the effect of FICO score, the difference between the original loan interest rate and the original 10 year rate, and the unemployment rate. In terms of default hazard we find similar effects of LTV and home price appreciation.

On the other hand we document a few differences, mostly about the link between home prices and prepayment rates. Liu (2016) finds that home price appreciation increases prepayment hazard while I find the opposite. Similarly, he finds that higher LTV reduces prepayment hazard while I find no clear link. As discussed by Gorton (2009), while the prepayment option is always valuable to a conforming loan borrower, i.e., when house prices rise borrowers build up equity, for subprime loans lenders hold an implicit option to benefit from house price changes. Table 9 corroborates the deterring effect of prepayment penalties.

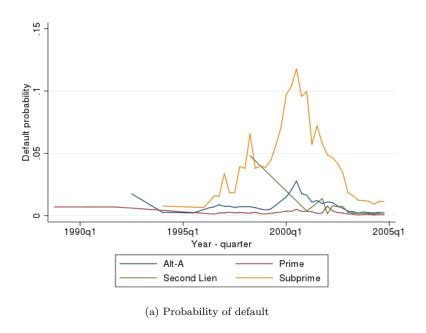


Figure 3.2: Probability of default implied from the complementary log-log model, estimates of which are in Table 10. Using loan covariates at origination, default probabilities are computed at the loan level. Averages are computed by asset type and month after origination, and plotted here.

The break-even probabilities of a crisis computed by Beltran, Cordell, and Thomas (2017) from CDO prices show a decrease from pre-2006 cohorts to later ones, which suggests a relatively high risk premium was charged in early cohorts. Though there are no studies on risk premia in mortgage markets, I can benchmark the ones I use against the corporate market. Berndt, Douglas, Duffie, Ferguson, and Schranz (2005) derive actual and risk-neutral probabilities from CDS market

¹⁹ Adding late originations, i.e., up to 2007, I find a number of similarities. The main difference that arises is that now subprime loans can be seen to be prepaying significantly more than other types and significantly more than early vintages. This suggests that the link between subprime origination and home prices through prepayments was specific to the pre-crisis boom rather than a design feature of subprime loans. Macroeconomic factors, such as home price appreciation and unemployment, exhibit a similar effect on defaults and prepayments when adding late vintages. Instead, for coupon gap there is a change compared to the early sample. The coupon gap, i.e., the change in 10 year rates between origination and present, reflects stronger incentives to refinance. The expectation is that this leads to a higher probability of prepayment and a lower probability of default, which I see once I add late cohorts, but not in the early sample.

quotes. They find that the corresponding coverage factor, i.e. the ratio of risk neutral to the real probability, oscillates between 1.5 and 3.5 from 2002 to 2003. I use a coverage ratio of 3.20

Using the model in Table 10 I predict prepayment hazards and default probabilities at the loan level and average them at the deal level, so that both the default probability and the hazard rate are estimated deal by deal. For the prepayment hazard, I use the full schedule in order to estimate the average prepayment speed for the given deal over the first 60 months. As Figure 3.1 illustrates, subprime loans have the highest prepayment rates, followed by alt-A loans. They also have the highest default probabilities, as shown in Figure 3.2. I use the model-implied PDs from Table 10 (see Figure 3.2) and include them as controls.

I source contractual maturity from Bloomberg, which for most bonds is close to 30 years. These figures are high compared with realized maturity, defined as the first observation where the tranche balance is zero, the difference being 16.27 years on average on a sample of 5,507 tranches. Figure A.12 also suggests that bonds do not live that long on average. Adelino (2009) uses weighted average life (WAL) instead of contract maturity, which is closer to the realized maturity. I also source WAL for a sample of loans where I could find it, but found that WALs are low compared to realized maturities in the data (the average difference is 6.77 years on a sample of 16,894 tranches, see Figure A.13 for a further breakdown of the difference). In the final model I use contractual maturity, relying on the prepayment speed model to achieve an accurate reduction of tranche balance over time.

The model in Table 10 incorporates all observations. In reality, agents' expectations about default evolve over time, especially as the business cycle unfolds. As an example, take home prices, which fluctuate over the cycle. As Table 11 shows, home price appreciation is the variable whose effect on defaults changes the most over the cycle. In particular, the negative relationship between price appreciation and defaults documented in Table 10 is an average between the positive effect recorded in the early years of the sample (up to 2002) and the negative effect in subsequent years. I expect this to have a modest impact on the pricing model, given that over the times of the prices I am interested in, mostly 2004 and 2005, the coefficients in Table 11 tend to be close to those in Table 10.

Loan performance data gives a basis for consensus about probability of default, loss given default and prepayment speed. As discussed in the introduction, default correlation is the parameter on which market participants are more likely to disagree ²¹. Seeing these disagreements as the starting point for differential information, I will use the pricing model from Section 2 to generate a summary statistic that signals future downgrades, and study how asset opacity drives the informativeness of the signal as opposed to bond seniority.

²⁰ Heynderickx, Cariboni, Schoutens, and Smits (2016) quantify coverage factors from CDS quotes of European corporates and find that they range between 1.27 for Caa (Moody's) ratings to 13.51 for Aaa ones on pre-crisis data. Like Heynderickx et al. (2016), Denzler, Dacorogna, Müller, and McNeil (2006) argue that risk spreads exhibit a scaling law, whereby risk premia are decreasing in the probability of default. The results in Table 8 imply coverage ratios between 2.03 for subprime deals and 3.27 for Alt-A ones, in line with the literature.

^{21 &}quot;Currently, the weakest link in the risk measurement and pricing of CDOs is the modeling of default correlation." Duffie (2008)

3.2 Deriving implied default correlations from CMO prices

For a given bond I compute its implied correlation ρ using the coupon rate c, market price p, attachment point and detachment point $a \geq 0$ and $a < b \leq 1$. The probability of default and prepayment speed are estimated per Section 3.1. I use the discount rate r = 4.27%, the average 10-year constant maturity treasury (annual) rate between 1995 and 2015. The numerical computations of loss probability are evaluated using a trapezoidal rule, which Brunne (2006) deems faster than Gauss-Legendre and Gauss-Hermite methods. Figure 3.3 provides a summary of observations.

Implied correlations were uniformly increasing across seniorities in the running to the crisis, as can be seen from Figure 3.3. The overall distribution of individual outcomes is strongly bimodal (see Figure A.14). Tzani and Polychronakos (2008) find that in CDS markets model correlations would sometimes have had to exceed 100% in order to price supersenior tranches, which is suggested by Figure A.15. The extreme values suggest there is a role for market incompleteness as in Andreoli et al. (2016) and Stanton and Wallace (2011).

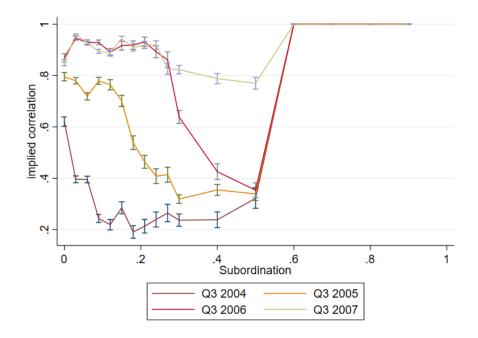


Figure 3.3: Average correlation plotted against tranche subordination percentage on four given quarters. I use the sample of bonds originated prior to June 2005. Subordinations are assigned to 10 bins. Within each subordination bin I plot the average correlation, along with vertical whiskers representing the standard error of the average.

By the third quarter of 2006, implied correlations had reached crisis levels except for upper seniorities. Taking into account the highest seniorities, Figure 3.3 also shows evidence of a correlation smile.²²

$$(b-a)e_i^{[a,b]} = be_i^{[0,b]} - ae_i^{[0,a]},$$

²² The correlation smile is an artifact from the compound correlation method (O'Kane and Livesey, 2004). A method that is used to derive increasing correlations is the base correlation, which is computed as follows: let the attachment points in the full waterfall be given by (b_1, \ldots, b_n) , where $b_n = 1$. First, solve 6 for the tranche $[0, b_k]$, $k = 1 \ldots n$. This gives an estimate of $e_i^{[0,b_k]}$. Using the identity

Implied correlations increased further during the crisis. I observe a statistically significant increase, from 0.89 in September 2007 to 0.93 in February 2009.²³ Using also a one factor Gaussian copula model, Buzková and Teplỳ (2012) analyze prices of the 5-year, North American investment grade CDX (V3) index. They report that for synthetic CDOs, implied correlations see a large increase on average, from 0.15 to 0.55. In terms of seniorities, the difference observed by Buzková and Teplỳ (2012) over the crisis is mainly driven by mezzanine tranches (7%-10% and 10%-15%). Figure 3.3 also suggests the increase in correlation is larger among intermediate seniorities.

Ratings were mostly stagnant in the running to the crisis, especially for AAA tranches, in comparison with default correlations (see Figure A.17). BBB tranches even see an improvement in ratings ahead of the crisis while correlations are increasing (except for subprime deals, which see both downwards and upwards changes. The sharpness of rating downgrades suggests this is a concern for BBB tranches. Griffin and Tang (2012) argue that AAA ratings were inflated in CDO securities, with optimistic ratings applied to a large share of bonds issued. Because CDOs are mainly composed of mezzanine CMO tranches, a potential channel for rating inflation in AAA CDO tranches is rating upgrades of BBB tranches.²⁴ This gives a possible channel for ratings inflation over the cycle other than that of boom time originations.

The graphic evidence presented is suggestive that market prices lead ratings. Whether this means investors learn faster than ratings agencies will be assessed by whether ratings are sufficient for implied correlations regarding bond outcomes, which I consider in the next section.

4 The information content of implied correlations

This section will focus on assessing the findings of section 2 using implied correlations as a summary statistic for prices, coupons and subordinations. I start with the same logit specification as equation 1, using implied correlation as the independent variable. More specifically,

$$\mathbb{1}\{downgrade_{i,2009}\} = \begin{cases} 1 \text{ if } \alpha + \beta \rho_{i0} + \eta_{rating_{i0}} + \varepsilon_i \ge 0\\ 0 \text{ otherwise} \end{cases}$$
 (12)

where $\varepsilon_i \mid \rho_{i0}$ has a logit distribution. The independent variable of interest is the implied correlation at the first transaction, ρ_{i0} .

As shown in Figure A.2, expected losses for the senior tranche are monotonically increasing in default correlation ρ while the opposite happens for the junior tranche. The mezzanine tranche

the expected losses in tranche [a,b] can be sequentially computed along the waterfall: once the $[b_{k-1},b_k]$ tranche has been priced, the following one can be priced using

$$(b_{k+1}-b_k)e_i^{[b_k,b_{k+1}]}=b_{k+1}e_i^{[0,b_{k+1}]}-b_ke_i^{[0,b_k]}.$$

Base correlations price all tranches in a deal simultaneously. Because simultaneous transactions do not coincide frequently in time, I use the compound correlations and price each tranche separately.

²³ Breaking the change by asset type I document an increase for alt-A and subprime deals, from 0.81 to 0.97 and from 0.85 to 0.89 respectively (at 99% confidence), but no change for prime tranches (0.93). The upward adjustment was thus the largest among alt-A issues (see Figure A.16).

²⁴ Stanton and Wallace (2018) find that upgrades were more pervasive among commercial mortgage-backed securities than among RMBS, the upgrades being attributed to regulatory capital arbitrage.

behaves like a senior tranche for low correlations and like a junior tranche for high ones (Ashcraft and Schuermann, 2008; Duffie and Gârleanu, 2001; Duffie, 2008). Due to their subordination percentages, the bonds I observe behave more like a mezzanine or a senior tranche, so that a higher implied correlation should predict a more likely downgrade. I control for rating at origination using dummy indicators and for vintage year. Also, I cluster standard errors in all tests at the deal level to control for the fact that classes in the same deal are often (down)graded at the same time.

The results in Table 3 reconstruct those of Table 1, using implied correlation as a summary statistic of price, coupon and subordination. Ratings at origination are not statistically sufficient for implied correlations in predicting subsequent bond downgrades, similar to the results in Table 1 where rating is not sufficient for price, coupon and subordination. This is shown in column (1). Just as a lower price is reflective of more risk and thus of more likely downgrades, the implied correlation follows a similar intuition. I find a positive, significant coefficient, so that higher implied correlation increases the likelihood of downgrades.

Again I arrange the sample by bins decreasing in the level of opacity and present the result in columns (2)-(5). I find a ranking along the opacity index similar to the one discussed in Section 2, whereby the coefficient on implied correlations becomes statistically significant as the value of the opacity index drops, from insignificant at 10% for tranches below 0.25 to positive and significant at 1% for tranches above 0.75.

	(1) All	(2) $[0, 0.25)$	(3) $[0.25, 0.5)$	(4) $[0.5, 0.75)$	(5) [0.75, 1]
Correlation at first transaction	0.414*** (0.0629)	0.243 (0.250)	0.605*** (0.200)	0.476*** (0.102)	0.569*** (0.135)
Model-implied PD	2.294** (0.922)	0.381 (1.675)	13.60 (10.51)	4.331 (3.000)	4.225^* (2.521)
Observations	28,991	2,723	6,285	7,808	5,565
Rating at first transaction	Y	Y	Y	Y	Y
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y

Standard errors in parentheses

Table 3: Regression results from running logit specification (12) by maximum likelihood, controlling for vintage year (vintages up to June 2005) and model-implied probability of default as estimated in subsection 3.1. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include implied correlation and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the value of the documentation index corresponding to the given deal. Errors are clustered at deal level.

Table 4 breaks down the result between bonds initially rated AAA and the rest. While the coefficient for correlation at first transaction remains significant for grades below AAA, implied correlations seem to have no predictive power in terms of bond downgrades, similar to the findings in Adelino (2009). Comparing AAA tranches and others, a similar pattern across the two rating categories emerges; as opacity falls, implied correlation becomes more informative about subsequent bond downgrades. Note that on the left hand side extreme, i.e., for deals close to "no-doc",

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

both AAA and non-AAA implied correlations are uninformative. On the opposite side of the asset opacity distribution, both are informative. For tranches where the documentation index is above 0.5 implied correlation is predictive of bond downgrades. Seen together, the results suggest that uninformed investors are not so much those in AAA tranches as those subject to low-doc deals. They also suggest that the agency problem between junior and senior investors obtains for intermediate levels of asset opacity.

	(1) All	(2) $[0, 0.25)$	(3) $[0.25, 0.5)$	$(4) \\ [0.5, 0.75)$	(5) [0.75, 1]
			AAA only		
Correlation at first transaction	0.299	1.018	0.430	1.647***	0.842***
Model-implied PD	(0.201) 4.308 (3.648)	(0.703) 47.95 (48.60)	(0.599) -13.93 (45.34)	(0.627) 12.91^{***} (4.648)	$ \begin{array}{c} (0.321) \\ 3.301 \\ (2.970) \end{array} $
Observations Rating at first transaction Vintage year	16,618 N/A Y	1,529 N/A Y	3,765 N/A Y	3,975 N/A Y	3,429 N/A Y
Asset type	Y	Y	Y	Y	Y
			Below AAA	Λ	
Correlation at first transaction	0.268*** (0.0644)	0.0485 (0.283)	0.370** (0.155)	0.314*** (0.109)	0.353** (0.158)
Model-implied PD	1.503 (1.023)	-2.323 (2.661)	26.14^{**} (10.85)	1.906 (2.607)	5.083 (3.180)
Observations	12,371	1,045	2,289	3,787	2,124
Rating at first transaction	Y	Y	Y	Y	Y
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y

Standard errors in parentheses

Table 4: Regression results from running logit specification (12) by maximum likelihood, controlling for vintage year (vintages up to June 2005) and model-implied probability of default as estimated in subsection 3.1. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include implied correlation and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the value of the documentation index corresponding to the given deal. Errors are clustered at deal level.

Figure 3.3 shows that for the most data relevant region (subordinations up to 0.4) the relationship between subordination and implied correlation is downward sloping. Higher seniorities see lower implied correlations, especially for early transactions. Accordingly, the results in Tables 3 and 4 echo those of Tables 1 and 2. However, the overall relationship is neither trivial (because the link between subordination and implied correlation cannot be derived in closed-form, and in particular is not linear) not monotonic (because of the presence of correlation smiles). These observations support the use of implied correlations as non-redundant summary measure of the pricing measures discussed in Section 2.

A potential concern is that ratings do not appear to be statistically sufficient simply reflects the finer granularity of price and subordination relative to a rating notch. As a robustness check, I

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

run the same set of regressions as before, using the deal level average correlation instead of the individual one. The results, presented in column (1) of Table 12, show that correlation loses its predictive power overall when averaged across the deal. The average at rating level retains some predictive power about subsequent downgrades. However, breaking the results down by opacity index in columns (2)-(5), I find a similar pattern in predictiveness of implied correlations, though the coefficient becomes significant only for the highest values of the documentation index. However, once I break down the results between AAA and sub-AAA tranches in Table 13, only AAA tranche implied correlations are predictive but only in the highest documentation index values. In all these tables, the change in predictiveness is best represented by the subordination amount.

Low-doc assets should in principle require a form of compensation for the lemons problem; all else constant, a sophisticated investor requires more subordination when the underlying asset is opaque. Instead, Skreta and Veldkamp (2009) predict that rating inflation can be worse when assessing the true value of the asset is difficult and so ratings are noisy. For their result to hold, investors must be unable to infer the rating selection bias. Similarly in this case, investors who are unaware of the deficiency in documentation are more likely subject to inflated ratings. Table 14 provides evidence that AAA share at origination is increasing in opacity, controlling for the model-implied probability of default.²⁵ Because the equity tranche size is also likely to be increasing in opacity, as shown by Begley and Purnanandam (2017), the larger AAA tranche might be precisely an equilibrium response to the strong quality signal. This aspect of security design deserves further attention.

5 Summary and discussion

This paper weighs the relative importance of two key information frictions that take place between the private investor and the issuer of mortgage-backed securities. Though there is a role for what the literature calls investor unsophistication, proxied by a AAA rating at origination, asset opacity predominates as a friction. I measure opacity using a deal-level index of documentation completeness. I observe less of a differential in information content across seniorities than across low-doc assets and full-doc ones. The latter exhibit better information content across the rating spectrum. In particular, AAA prices are no less predictive than the rest when the bond comes from a deal with a high standard of documentation. In addition, the results suggest that errors in computing default correlations in the running to the crisis were not a problem of AAA investors per se, but rather a problem of low-doc investors.

The results suggest that a regulation intervention focusing on the agency problem, such as risk retention in the form of skin in the game, does not address the main information friction. Therefore it should be complemented by market transparency initiatives aiming towards better documentation on the underlying loans. To the extent that incomplete information is easier to tackle than differential sophistication, such transparency initiatives can be an effective instrument to help price informativeness in private label securitization markets. A blanket reduction of low-doc lending in mortgage markets could address the widespread increase of fraud that was observed during the

 $^{^{25}}$ Note that Begley and Purnanandam (2017) find the opposite result on a smaller sample of deals, but the significance disappears once controlling for risk attributes.

boom, but would likely result in rationing against self-employed borrowers as shown by Ambrose et al. (2016). My results, which focus on information instead of performance, have no direct implications about the issuance of the loans. Instead, they suggest that the securities built from such loans results in prices that are less informative than those arising from other asset classes. Linking skin in the game requirements in securitization deals to documentation completeness might give an incentive to balance incentives to information with origination of low-doc loans.

My focus on early originations leaves out developments that took place over the boom. Recent literature suggests that deal opacity had an increasingly important role in the running to the crisis. Using six measures of deal complexity built from the prospectuses of subprime securities issued between 2002 and 2007, Ghent, Torous, and Valkanov (2016) offer evidence of growing obfuscation between the issuer and the senior investor; the latter didn't price in the higher risks due to security complexity (complexity being measured by the number of tranches in the deal). They argue that complex deals facilitated the collusion between the issuer and the junior investor (Demiroglu and James, 2012) to divert cash flows from senior securities to junior ones. I find that for pre-boom originations across the spectrum (prime, alt-A and subprime) both senior and junior investors are equally affected by loan opacity, suggesting that collusion became a problem over the boom.

The literature has largely attributed default clustering to joint dependence on a systematic shock (Bisias, Flood, Lo, and Valavanis, 2012; Chan-Lau, Espinosa, Giesecke, and Sole, 2009; Bullard, Neely, Wheelock, et al., 2009; Khandani, Lo, and Merton, 2013). Using a Gaussian copula I find that implied correlations are relatively large in subprime deals, which reflects a design feature that made subprime loans jointly dependent on house price indices. Recent literature distinguishes two additional sources of default clustering: unobserved frailty (Duffie, Eckner, Horel, and Saita, 2009; Kau, Keenan, and Li, 2011; Griffin and Nickerson, 2016) and contagion (Bai, Collin-Dufresne, Goldstein, and Helwege, 2015; Azizpour, Giesecke, and Schwenkler, 2016; Gupta, 2016; Sirignano, Sadhwani, and Giesecke, 2016). Whether these additional sources of default clustering were priced remains an open question.

A Supporting tables and figures

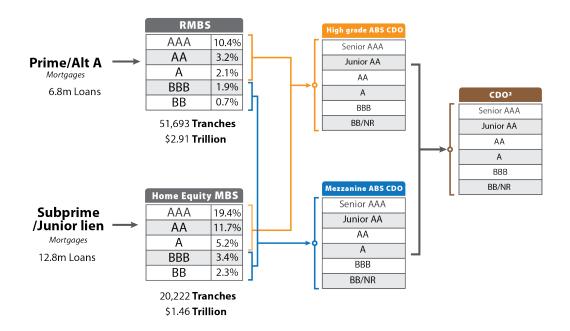


Figure A.1: Diagram: from loans to RMBS CMO, from CMO to CDO, from CDO to CDO². Details are reported on the total number of loans recorded by ABSNet, the universe of securities issued and the average subordination percentage by Standard & Poor's rating, as explained in Section 1

Voor	ABSNet samp	ole	Adelino (200	9)
Year	Origination (\$bn)	Count	Origination (\$bn)	Count
≤ 2002	319.3	5,438		
2003	470.5	10,120	496.5	8,574
2004	677.4	$12,\!519$	767.3	$11,\!460$
2005	904.5	16,684	1,058.5	17,135
2006	1,038.0	15,022	1,080.4	18,206
2007	939.4	11,716	802.1	$12,\!037$
≥ 2008	31.2	177		
Total	4,380.3	71,676	4,204.8	67,412

Table 5: Origination amounts and counts at origination, by vintage year, compared to the sample in Adelino (2009).

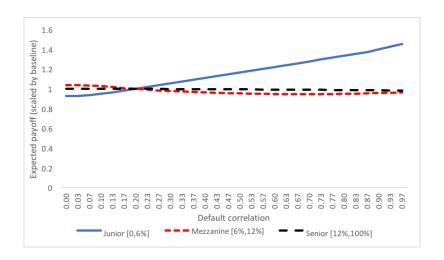


Figure A.2: Sensitivity of a simulated CMO structure to default correlations. I plot the expected payoff within a given tranche against the value of the underlying correlation ρ (parameters are PD=5% and LGD=50% as in Coval et al. (2009a)). The results are normalized by baseline estimate, based on the same parameters and a correlation $\rho=20\%$. No prepayments are incorporated (i.e. SMM=0%) for comparability of outcomes.

A aget true	After Jun-0	5	Before Jun-0)5
Asset type	Origination (\$bn)	Count	Origination (\$bn)	Count
Alt-A	1,179.0	16,837	557.7	11,000
Prime	621.7	9,097	557.9	14,759
Second Lien	64.7	478	19.0	408
Subprime	660.0	9,811	720.2	9,525
Total	2,525.4	36,223	1,854.8	35,692

Table 6: Issued amounts and counts by asset type.

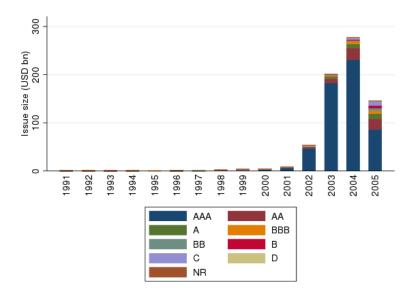


Figure A.3: Amount issued by vintage year for private label collateralized mortgage obligations. Source: ABSNet bond data. For our sample of early vintages (prior to June 2005) I provide the distribution by (coarse, see Table 15) initial rating.

]	My sample	Cord	ell et al. (2012)
rating	Prime/Alt-A	Second Lien/Subprime	Prime/Alt-A	Second Lien/Subprime
AAA	10.8%	25.7%	6%	23%
AA	3.4%	14.3%	3%	13%
A	3.0%	5.9%	2%	8%
BBB	2.9%	4.0%	1%	4%

Table 7: Subordination percentage by tranche rating - comparison. The figures computed using ABSNet data are derived by aggregating the subordination percentages at origination as given in Table 1.2. Our sample contains only early vintages (prior to June 2005) while Cordell et al. (2012) use late vintages as well.

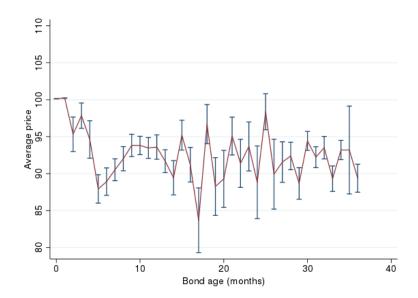


Figure A.4: Average tranche price by age of the bond in months. For our sample of bonds originated in 2004 and 2005 I compute the average price by the time elapsed (in months) since the bond issue. Vertical whiskers show the standard errors.

	(1)	(2)	(3)
Asset type	Early vintages	Late vintages	Model PD
Alt-A	7.5%	19.5%	24.5%
Prime	2.3%	6.6%	6.4%
Second Lien	7.2%	25.8%	21.1%
Subprime	14.8%	30.5%	30%
Observations	4,060,698	631,793	2,112

Table 8: Liquidation rates from the loan sample, and PD used for baseline estimation. Column (1) calculates the percentage of loans linked to early vintage deals (before June 2005) that are liquidated. Column (2) calculates the same ratio for late vintage loans. Column (3) shows the PD parameters used for the pricing model, calculated as the average of the deal level liquidation rates for both early and late deals.

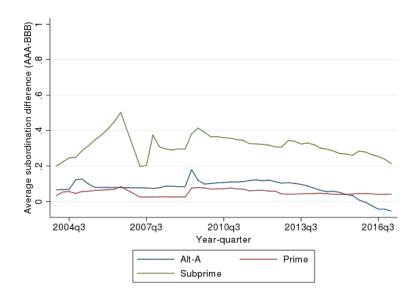


Figure A.5: Average subordination difference between AAA and BBB bonds. Source: ABSNet bond data. The figure presents the difference between the average AAA and average BBB subordination over trading time (for early vintages, prior to June 2005) using the rating at the given trading time. The difference is computed by asset type.



Figure A.6: Average documentation index by vintage year. Source: ABSNet loan data. I assign a documentation score to each loan (no documentation=0; partial=0.1; alternative=0.3; full=1). Then for a given deal I compute the average documentation score and present the averages by asset type and vintage year.

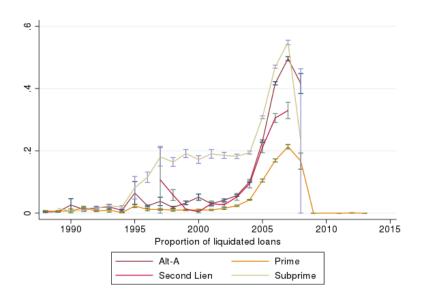


Figure A.7: Probability of default by vintage year. I compute the default rate for each of the deals that compose our population, and then average by vintage year and asset type. The results are presented here along with standard error bands around the average.

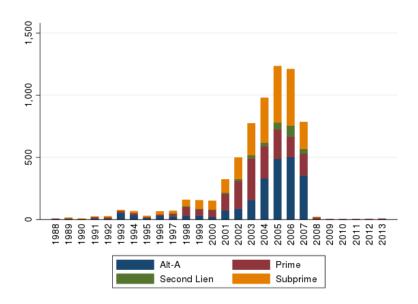


Figure A.8: Number of deals originated by asset type and vintage year.

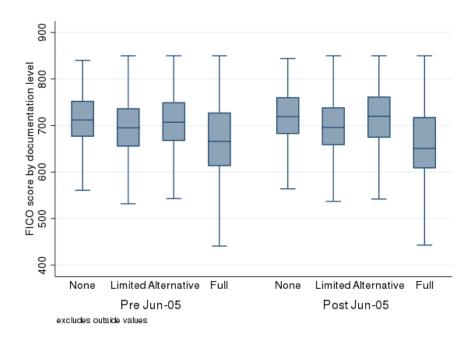


Figure A.9: Box plot exhibiting the median, interquartile range, lower and higher adjacent values of FICO scores at origination over categories of documentation completeness. The plot excludes loans originated after June 2005.

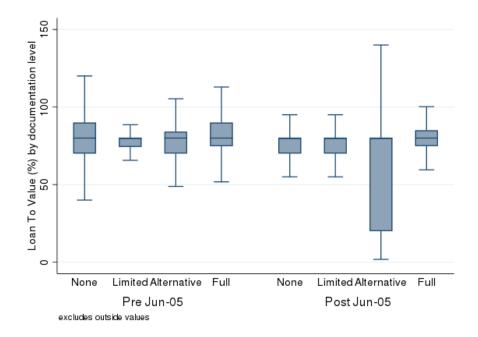


Figure A.10: Box plot exhibiting the median, interquartile range, lower and higher adjacent values of LTV at origination for each category of documentation completeness. The plot excludes loans originated after June 2005.

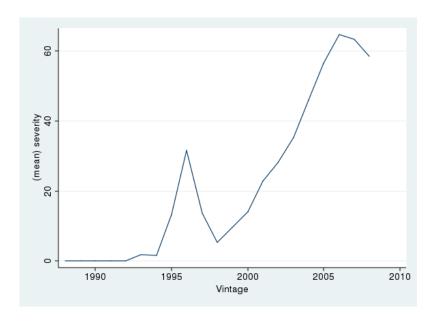


Figure A.11: Percentage loss given default by vintage year. The aggregate loss given default is computed from the sample of loans associated to the deals that compose our population of CMOs.

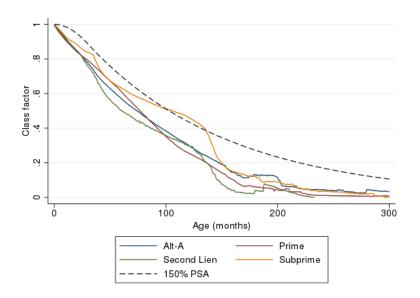
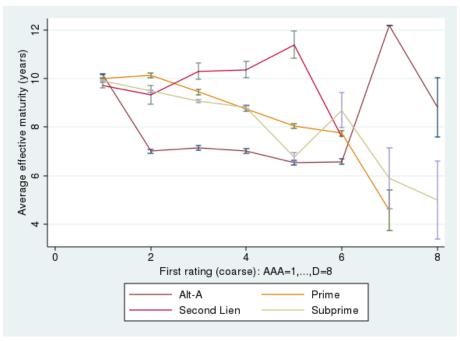


Figure A.12: Average class balance factor by asset class over tranche age. Alongside the averages, I compute the balance factor that results from a 150% payment schedule alone (excluding planned amortization).





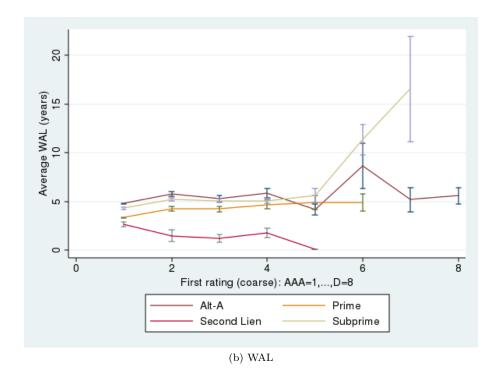


Figure A.13: Average realized and weighted average life by coarse rating and asset type. The second panel includes observations where I found a matching WAL in Bloomberg.

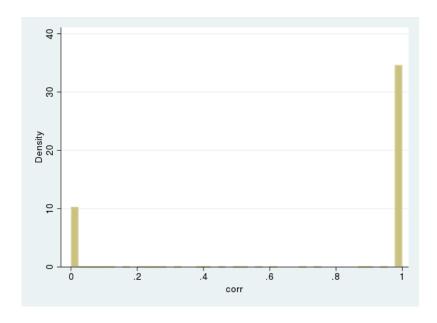


Figure A.14: Histogram plotting all outcomes from the pricing model.

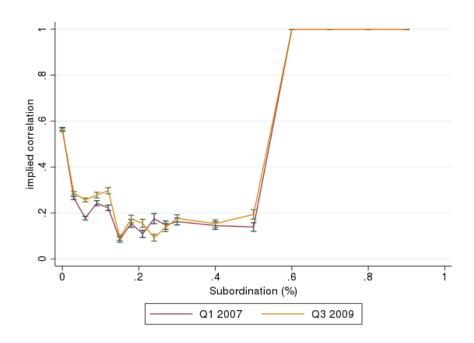


Figure A.15: Average correlation plotted against tranche subordination percentage, on two given dates. I use the sample of early vintage bonds (originated prior to June 2005). Subordinations are assigned to 10 equally spaced bins. Within each subordination bin I plot the average correlation, along with vertical whiskers representing the standard error of the average.

	with data	up to 2004	with data up to 2007		
	(1)	(2)	(3)	(4)	
	Default	Prepayment	Default	Prepayment	
log(FICO)	-1.468***	1.408***	-2.076***	0.305**	
	-0.157	-0.155	-0.199	-0.12	
owner occupied	0.039	-0.024	-0.098*	0.024	
	-0.05	-0.02	-0.054	-0.02	
original r - original 10 year rate	0.475***	0.249***	0.252***	0.066***	
	-0.01	-0.017	-0.011	-0.006	
log(original amount)	0.421***	0.257***	0.143***	0.02	
	-0.043	-0.031	-0.041	-0.026	
log(original LTV)	0.439***	-0.007	0.183***	0.069***	
	-0.043	-0.036	-0.033	-0.02	
prepayment penalty	-1.866***	-1.034***	-0.914***	-0.950***	
	-0.08	-0.073	-0.031	-0.025	
adjustable rate mortgage	0.655***	0.493***	0.367***	0.467***	
	-0.062	-0.047	-0.038	-0.015	
log(Cumulative HPA)	-8.398***	-7.780***	-6.482***	-2.474***	
	-1.041	-0.963	-0.652	-0.41	
coupon gap	0.400***	0.120*	-0.255***	-0.144**	
	-0.05	-0.062	-0.04	-0.06	
unemployment	0.330***	0.320***	0.201***	0.319***	
	-0.072	-0.075	-0.068	-0.075	
Asset type: Prime	-1.008***	-0.147***	-1.130***	-0.603***	
	-0.078	-0.027	-0.078	-0.033	
Asset type: Second Lien	-0.580***	0.124	0.843***	0.385***	
	-0.142	-0.079	-0.064	-0.028	
Asset type: Subprime	0.504***	-0.021	1.113***	0.201***	
	-0.053	-0.05	-0.037	-0.02	
CBSA FE	Y	Y	Y	Y	
Month since origination FE	Y	Y	Y	Y	
Observations	68,634,789	76,206,672	121,236,208	126,625,633	

Table 9: This table shows estimates using the maximum likelihood estimation of the complementary log-log specification in (11), using a nonparametric baseline hazard, on the loan level data available from ABSNet for private label loans (purchases only). The model treats competing risks independently, indicating 1 for failure and 0 for censoring. Each coefficient is the effect of the corresponding variable on the log hazard rate for either the default or prepayment of a mortgage. The conditional hazard is captured by performance month dummies, where performance is tracked over the first 60 months of the sample. The sample is truncated at December 2004 for columns (1) and (2), and at June 2007 for columns (3) and (4). Errors are clustered at CBSA level.

^{*} p < 0.1, ** p < 0.05, *** p < 0.01

	(1)	(2)
	(1)	(2)
	default	prepayment
$\log(FICO)$	-2.481***	0.448***
	-0.064	-0.018
owner occupied	0.025*	0.372***
	-0.014	-0.005
original r - original 10 year rate	0.429***	-0.011***
	-0.004	-0.001
log(original amount)	0.137***	0.324***
	-0.01	-0.003
log(original LTV)	0.572***	0.183***
- ,	-0.012	-0.005
adjustable rate mortgage	0.487***	0.579***
	-0.016	-0.004
log(Cumulative HPA)	-1.826***	-1.581***
- ,	-0.051	-0.011
coupon gap	0.848***	-0.261***
	-0.007	-0.002
unemployment	0.080***	0.001
- v	-0.004	-0.001
Asset type: Prime	-0.808***	-2.719***
V -	-0.044	-0.014
Asset type: Second Lien	-0.794***	0.298***
V -	-0.038	-0.011
Asset type: Subprime	0.402***	1.079***
¥	-0.025	-0.005
CBSA FE	N	N
Month since origination FE	N	Y
Observations	2,630,290	$76,\!374,\!400$
G, 1 1 : ,1		

Table 10: This table shows estimates using the maximum likelihood estimation of a complementary log-log specification, using a hazard specification for prepayments and a dummy indicator for default, on the loan level data available from ABSNet for private label loans (purchases only). The hazard model treats default risk as censored. Each coefficient is the effect of the corresponding variable on the log hazard rate for prepayment or the log probability of default of a mortgage. The conditional hazard is captured by performance month dummies, where performance is tracked over the first 60 months of the sample. The sample is truncated at December 2004.

^{*} p < 0.1, ** p < 0.05, *** p < 0.01

				default indi	cator (by th	end of the	given year)			
	2000	2001	2002		2004	2005	2006	2007	2008	2009
$\log(\mathrm{FICO})$	-2.485***	-3.599***	-4.816***		-3.141***	-3.682***	-4.561***	-4.160***	-3.029***	-2.059***
,	(0.494)	(0.257)	(0.151)		(0.071)	(0.052)	(0.038)	(0.027)	(0.018)	(0.014)
owner occupied	-0.318**	0.037	0.263***		-0.214***	-0.329***	-0.333***	-0.247***	-0.097***	-0.148***
	(0.139)	(0.069)	(0.041)		(0.016)	(0.011)	(0.008)	(0.006)	(0.004)	(0.003)
original r - original	-0.052	0.277***	0.199***		0.459***	0.343***	0.164***	0.178***	0.158***	0.102***
10 year rate	(0.038)	(0.018)	(0.011)		(0.004)	(0.003)	(0.002)	(0.001)	(0.001)	(0.001)
log(original amount)	-0.053	-0.038	-0.235***		0.150***	-0.026***	-0.297***	-0.126***	-0.029***	-0.013***
	(0.084)	(0.043)	(0.025)		(0.011)	(0.007)	(0.005)	(0.003)	(0.002)	(0.002)
$\log(\text{original LTV})$	0.828***	0.698***	0.585***		0.682***	0.548***	0.445***	0.178***	0.124***	0.078***
	(0.266)	(0.099)	(0.030)		(0.014)	(0.010)	(0.007)	(0.004)	(0.003)	(0.002)
adjustable rate	-0.707***	0.145**	0.305***		0.261***	0.269***	0.291***	-0.045**	-0.130***	0.001
mortgage	(0.104)	(0.058)	(0.035)		(0.016)	(0.011)	(0.008)	(0.006)	(0.004)	(0.003)
log(cumulative HPA)	1.921***	2.981***	4.548***		-1.878***	-0.877***	0.412***	-1.998***	-5.796***	-4.319***
	(0.676)	(0.248)	(0.122)		(0.054)	(0.030)	(0.018)	(0.017)	(0.011)	(0.007)
coupon gap	-1.930***	0.216***	-0.591***		0.998***	0.832***	0.170***	-1.057***	-0.810***	0.889***
	(0.062)	(0.037)	(0.019)		(0.000)	(0.000)	(0.005)	(0.004)	(0.002)	(0.002)
unemployment	0.137***	-1.052***	-0.342***		0.011**	0.126***	0.176***	0.004***	-0.183***	-0.309***
	(0.037)	(0.026)	(0.014)		(0.006)	(0.003)	(0.002)	(0.002)	(0.001)	(0.001)
Asset type: Prime	0.000	-1.048***	-0.805**		-0.621***	-0.299***	-0.248***	-0.669***	-1.456***	-1.640***
	\odot	(0.245)	(0.100)		(0.049)	(0.035)	(0.028)	(0.024)	(0.018)	(0.011)
Asset type: Second Lien	0.000	-3.509***	-5.936***		-1.984***	-0.213***	0.471***	0.877***	0.639***	0.616***
	\odot	(1.012)	(1.002)		(0.062)	(0.027)	(0.018)	(0.012)	(0.007)	(0.005)
Asset type: Subprime	2.872***	0.939***	0.213***		0.274***	0.438***	0.742***	1.027***	0.777***	0.710***
	(0.311)	(0.128)	(0.062)		(0.028)	(0.019)	(0.014)	(0.010)	(0.005)	(0.004)
Obs	230,631	516,866	865,545	1,435,035	2,630,290	4,307,739	5,766,680	6,014,866	6,014,866	6,014,866

Standard errors in parentheses * p < 0.1, ** p < 0.05, *** p < 0.01

Table 11: This table shows estimates using the maximum likelihood estimation of a complementary log-log specification, using a dummy indicator for default, on the loan level data available from ABSNet for private label loans (purchases only). For each year, variables are taken at the measurement point, either default time, if defaulted, or observation time, which is the end of the given year.

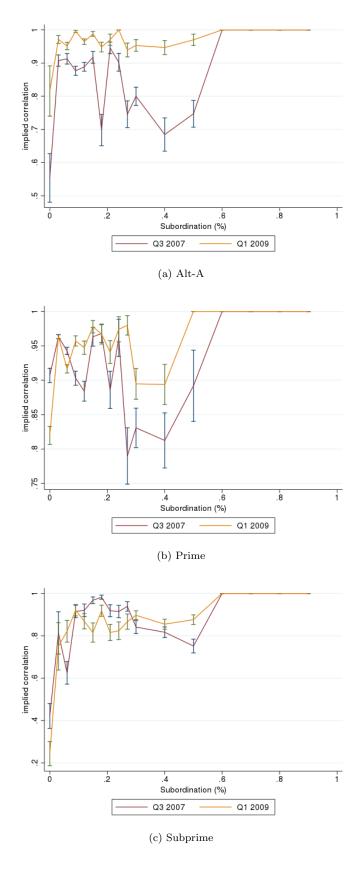


Figure A.16: Average correlation plotted against tranche subordination percentage, on two given dates. Subordination values are assigned to 10 equally spaced bins. Within each subordination bin I plot the average correlation, along with vertical whiskers representing the standard error of the average.

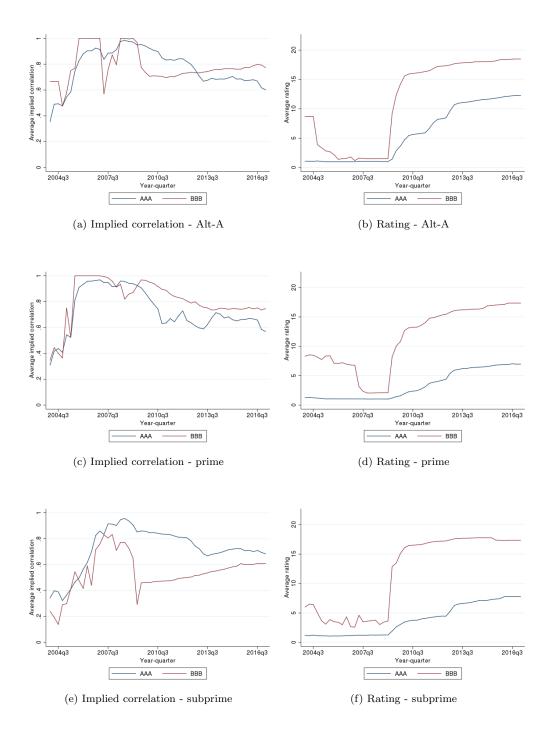


Figure A.17: Performance of early vintage tranches: average implied correlation and average rating for bonds originated before June 2005. For a given tranche I compute the implied correlation at each point in time. The average is taken by transaction period, by coarse rating at origination (AAA=1,...,BBB=4,...,D=8).

	(1)	(2)	(3)	(4)	(5)
	All	[0, 0.25) Dov	[0.25, 0.5) vngrade indic	[0.5, 0.75)	[0.75, 1]
Deal average correlation	0.211	-0.581	-0.155	-0.0162	0.901**
Price	(0.189) -0.0185***	(0.750) -0.0165***	(0.522) $-0.0202***$	(0.367) -0.0110***	(0.395) $-0.0167***$
	(0.00152)	(0.00631)	(0.00343)	(0.00269)	(0.00356)
Coupon	-0.123*** (0.0178)	-0.134** (0.0649)	-0.0369 (0.0310)	-0.117*** (0.0442)	-0.0749 (0.0465)
Subordination	-3.168*** (0.271)	-0.0512 (0.852)	-1.869*** (0.653)	-4.013*** (0.489)	-5.858*** (0.959)
Observations	26,242	2,489	5,513	7,073	5,049
Rating at first transaction	Y	Y	Y	Y	Y
Vintage year	Y	Y	Y	Y	Y
Asset type	Y	Y	Y	Y	Y

Table 12: Regression results from running logit specification 12 by maximum likelihood, controlling for vintage year (vintages up to June 2005) and model-implied probability of default as estimated in section 3.1. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include deal level average implied correlation and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the value of the documentation index corresponding to the given deal. Errors are clustered at deal level.

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

	(1)	(2)	(3)	(4)	(5)	
	All	[0, 0.25)	[0.25, 0.5)	[0.5, 0.75)	[0.75, 1]	
	Downgrade indicator - AAA only					
AAA average correlation	0.721*	5.310	0.701	1.074	3.019***	
	(0.427)	(3.508)	(1.594)	(0.962)	(0.857)	
Price	-0.0446***	-0.0309***	-0.0351***	-0.0328***	-0.0535***	
	(0.00305)	(0.00991)	(0.00542)	(0.00655)	(0.0118)	
Coupon	-0.0402	0.0452***	0.0544	0.0898	0.149**	
•	(0.0245)	(0.0173)	(0.0453)	(0.0580)	(0.0726)	
Subordination	-4.144***	0.610	-2.791**	-2.283	-11.79***	
	(0.601)	(1.530)	(1.260)	(1.851)	(4.377)	
Observations	14,034	$1,325^{'}$	3,073	$3,\!272^{'}$	2,926	
Rating at first transaction	N/A	N/A	N/A	N/A	N/A	
Vintage year	Y	Y	Y	Y	Y	
Asset type	Y	Y	Y	Y	Y	
		Downgrad	de indicator -	not AAA		
Below-AAA average correlation	0.369*	-1.266	0.527	-0.0727	0.195	
	(0.217)	(0.886)	(0.548)	(0.431)	(0.574)	
Price	-0.00937***	-0.0154**	-0.0127***	-0.00783***	-0.0115***	
	(0.00150)	(0.00704)	(0.00370)	(0.00249)	(0.00362)	
Coupon	-0.183***	-0.357***	-0.174***	-0.201***	-0.155***	
	(0.0240)	(0.103)	(0.0496)	(0.0529)	(0.0599)	
Subordination	-4.113***	$0.133^{'}$	-2.715***	-4.482***	-4.278***	
	(0.316)	(1.905)	(0.878)	(0.541)	(0.852)	
Observations	12,206	1,038	2,248	3,757	2,111	
Rating at first transaction	Y	Y	Y	Y	Y	
Vintage year	Y	Y	Y	Y	Y	

Asset type

Table 13: Regression results from running logit specification 12 by maximum likelihood, controlling for vintage year (vintages up to June 2005) and model-implied probability of default as estimated in section 3.1. The dependent variable is a dummy indicator for whether there was a downgrade by December 2009. Independent variables include AAA average correlation (upper panel), sub-AAA average correlation (lower panel) and coarse rating dummy indicator at the time of the first transaction. Each column presents the results on a subset of the data corresponding to the value of the documentation index corresponding to the given deal. Errors are clustered at deal level.

Y

Y

Y

Y

Y

	(1)	(2)	(3)	(4)			
	AAA balance at origination as share of deal issuance						
Opacity index	-0.104***	-0.0835***	-0.101***	-0.0259*			
	(0.0154)	(0.0153)	(0.0151)	(0.0151)			
Observations	1,902	1,902	1,902	1,902			
Model-implied PD	N	Y	Y	Y			
Vintage year	N	N	Y	Y			
Asset type	N	N	N	Y			

Table 14: Regression results from running a linear regression at deal level of AAA origination (as share of total) on the deal opacity index. Controls include model-implied PD, vintage year (I include vintages up to June 2005) and asset type.

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

^{*} p < 0.10, ** p < 0.05, *** p < 0.01

S&P rating	Code	Coarse rating	Code
AAA	1	AAA	1
AA+	2	AA	2
AA	3	AA	2
AA-	4	AA	2
A+	5	A	3
A	6	A	3
A-	7	A	3
BBB+	8	BBB	4
BBB	9	BBB	4
BBB-	10	BBB	4
BB+	11	BB	5
BB	12	BB	5
BB-	13	BB	5
B+	14	В	6
В	15	В	6
В-	16	В	6
CCC	17	\mathbf{C}	7
CCC-	18	\mathbf{C}	7
CC	19	\mathbf{C}	7
\mathbf{C}	20	\mathbf{C}	7
D	21	D	8
NR	-	NR	-

Table 15: Mapping of ratings - fine and coarse level (with numbering code)

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