

Regulatory Capital Alpha Factor

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1 Theorems and Definitions

In the following, we assume all the conditions needed for these statements to be true are satisfied.

Random Variable	X
Joint Probability	$\begin{aligned} P(X, Y) \\ &= P(X \cap Y) \\ &= P(X Y)P(Y) \\ &= P(Y X)P(X) \end{aligned}$
X independent of Y	$\begin{aligned} \Leftrightarrow P(X \cap Y) &= P(X)P(Y) \\ \Leftrightarrow P(X Y) &= P(X) \end{aligned}$
Expectation Value	$\mathbb{E}[X] = \sum_i x_i P(X = x_i) \equiv \sum_i x_i P(x_i)$
Multivariate Expectation Value	$\mathbb{E}[XY] = \sum_{i,j} x_i y_j P(x_i, y_j)$
Conditional Expectation	$\mathbb{E}[X Y = y] = \sum_i x_i P(x_i y)$
Probability Chain Rule	$P(X \cap (YZ)) = P(X YZ)P(YZ)$
Completeness	$\sum_i P(X = x_i) = 1$
Law of total probability	$P(Y) = \sum_i P(Y, x_i)$

2 Motivation

In Basel 2, risk weighted assets (RWA) is the typical amount of the money a counterparty may owe you at some point in the future, accounting for the probability that the counterparty defaults. Under the advanced internal ratings based (AIRB) method, it's calculated as follows:

$$RWA = EAD \times (WCDR-PD) \times LGD \times MA \quad (1)$$

Alpha shows up in both standardized and internal OTC EAD formulas:

$$EAD_{SACCR} = \alpha \cdot (RC + PFE) \quad (2)$$

$$\begin{aligned} EAD_{IMM} &= \alpha \cdot \text{Effective EPE} \\ \text{Effective EPE} &= \sum_{k=1}^{\min(1\text{year}, \text{maturity})} \text{Effective EE}_{t_k} \times \Delta t_k \\ \text{Effective EE}_{t_k} &= \max(\text{Effective EE}_{t_{k-1}}, \text{EE}_{t_k}) \end{aligned} \quad (3)$$

In the IMM and SACCR EAD, α is typically set to 1.4. However, what does α represent, and why do we need it? The following notes attempt to derive RWA capital (denoted below as expectation value of Loss), and outlines the assumptions which give rise to α .

3 Alpha Derivation (1 counterparty)

Let T be some future time. Let $D = \{0, 1\}$ indicate whether the counterparty has defaulted (1) or not (0) at time T . Let E be the exposure at time T . Exposure measures how much money the counterparty owes us, and is defined as $E = \text{Max}(M, 0)$. Here M is the value of the portfolio where a positive number means they owe us and a negative number means we owe them. Note that E and D at future time T are both random variables governed by some probability distribution function. Putting all this together, the amount of money we lose at future time T is:

$$L = D \cdot E \quad (4)$$

In the equation above, we assumed that the loss given default (LGD) is 1, meaning we lose 100% of what we are owed.

Let's now calculate the expectation value of L :

$$\begin{aligned}
\mathbb{E}[L] &= \mathbb{E}[D \cdot E] \\
&= \sum_{i,k} e_i d_k P(d_k, e_i) \\
&= \sum_{i,k} e_i d_k P(d_k|e_i) P(e_i)
\end{aligned} \tag{5}$$

Let's *assume* that the dependence of defaults on exposure can be captured by a constant fudge factor α . This can be loosely motivated by using Bayes' theorem:

$$\begin{aligned}
P(d|e) &= \frac{P(e|d)}{P(e)} P(d) \\
&\approx \alpha P(d)
\end{aligned} \tag{6}$$

Saying that α is constant in the equation above violates conservation of probability, but let's call this a minor inconvenience and press onwards. Eq. [5](#) can then be approximated as

$$\begin{aligned}
\mathbb{E}[L] &\approx \sum_{i,k} e_i d_k \alpha P(d_k) P(e_i) \\
&= \left[\sum_i \alpha e_i P(e_i) \right] \left[\sum_k d_k P(d_k) \right] \\
&\equiv \text{EAD} \cdot \text{PD}
\end{aligned} \tag{7}$$

Since Eq. [5](#) approximately equals Eq. [7](#), we can express α as:

$$\alpha = \frac{\sum_{i,k} e_i d_k P(d_k|e_i) P(e_i)}{[\sum_i e_i P(e_i)] [\sum_k d_k P(d_k)]} \tag{8}$$

Therefore, α accounts for the correlation between default probabilities and exposures in the regulatory capital calculation.

4 Alpha Derivation (N counterparties)

Let's assume $N = 2$. The general N case will trivially follow based on the assumptions we will make.

$$\begin{aligned}
\mathbb{E}[L] &= \mathbb{E}[(D \cdot E)_{\text{cpty A}} + (D \cdot E)'_{\text{cpty B}}] \\
&= \sum_{i,j,k,l} (e_i d_k + e'_j d'_l) P(d_k, d'_l, e_i, e'_j) \\
&= \sum_{i,j,k,l} (e_i d_k + e'_j d'_l) P(d_k, d'_l | e_i, e'_j) P(e_i, e'_j) \\
&= \sum_{i,j,k,l} e_i d_k P(d_k, d'_l | e_i, e'_j) P(e_i, e'_j) + \sum_{i,j,k,l} e'_j d'_l P(d_k, d'_l | e_i, e'_j) P(e_i, e'_j)
\end{aligned} \tag{9}$$

Let's now make a number of assumptions:

1. Exposures of A and B are independent: $P(e, e') = P(e)P(e')$
2. Defaults of A and B are independent conditional on exposures: $P(d, d' | e, e') = P(d | e, e')P(d' | e, e')$
3. α_A correlates defaults of A on exposures of A and B: $P(d | e, e') \approx \alpha_A P(d)$
4. α is universal: $\alpha_A = \alpha_B = \alpha$

Using all of these strong assumptions, Eq. [9](#) becomes:

$$\begin{aligned}
\mathbb{E}[L] &\approx \sum_{i,j,k,l} e_i d_k P(d_k | e_i e'_j) P(d'_l | e_i e'_j) P(e_i) P(e'_j) + \sum_{i,j,k,l} e'_j d'_l P(d_k | e_i e'_j) P(d'_l | e_i e'_j) P(e_i) P(e'_j) \\
&= \sum_{i,j,k,l} e_i d_k \alpha P(d_k) P(d'_l | e_i e'_j) P(e_i) P(e'_j) + \sum_{i,j,k,l} e'_j d'_l P(d_k | e_i e'_j) \alpha P(d'_l) P(e_i) P(e'_j) \\
&= \sum_{i,k} \alpha e_i P(e_i) d_k P(d_k) \sum_{j,l} P(d'_l | e_i e'_j) P(e'_j) + \sum_{j,l} \alpha e'_j P(e'_j) d'_l P(d'_l) \sum_{i,k} P(d_k | e_i e'_j) P(e_i) \\
&= \sum_{i,k} \alpha e_i P(e_i) d_k P(d_k) + \sum_{j,l} \alpha e'_j P(e'_j) d'_l P(d'_l) \\
&= (EAD \cdot PD)_{\text{cpty A}} + (EAD \cdot PD)'_{\text{cpty B}}
\end{aligned} \tag{10}$$

In the fourth line above, we have used completeness property of probabilities. Since Eq. [9](#) approximately equals Eq. [10](#), we can express α in the general case as:

$$\alpha = \frac{\sum_{i,j,k,l} (e_i d_k + e'_j d'_l) P(d_k, d'_l, e_i, e'_j)}{\sum_{i,k} e_i P(e_i) d_k P(d_k) + \sum_{j,l} e'_j P(e'_j) d'_l P(d'_l)} \tag{11}$$

The extension to N counterparties follows naturally.

5 Correlating Exposures and Defaults

We've derived α in terms of a joint probability distribution of exposures and defaults. In practice, how do we correlate these two observables? To do so, we need to introduce the framework of copulas, Rieman-Stieltjes integrals and multivariate normal distributions.

We begin by introducing two independent random variables M and Z_i , such that $M \sim N(0, 1)$ and $Z \sim N(0, 1)$. This means that M and Z_i are sampled from a Gaussian distribution $N(\mu, \sigma^2)$ with mean μ and variance σ^2 . Let's construct a new variable X_i :

$$X_i = \sqrt{\rho}M + \sqrt{1 - \rho}Z_i \quad (12)$$

This is the usual procedure done in John Hull for example, where X_i is typically thought of as the asset returns for portfolio i , M is a systemic factor affecting all portfolios, and Z_i is an idiosyncratic factor affecting only i . Let's explore the properties of X_i . Given a variable $y \sim N(\mu, \sigma^2)$, one can prove that $ay + b \sim N(a\mu + b, a^2\sigma^2)$. Therefore, $\sqrt{\rho}M$ and $\sqrt{1 - \rho}Z_i$ are also normally distributed. It's also true that the sum of two normally distributed random variables results in a normally distributed variable X_i . So what is the mean and standard deviation of X_i ?

$$\begin{aligned} E(X_i) &= E(\sqrt{\rho}M + \sqrt{1 - \rho}Z_i) \\ &= \sqrt{\rho}E(M) + \sqrt{1 - \rho}E(Z_i) \\ &= 0 + 0 \\ &= 0 \\ Var(X_i) &\equiv cov(X_i, X_i) \\ &= E((X_i - E(X_i))(X_i - E(X_i))) \\ &= E(X_i X_i) \\ &= E(\rho M^2 + 2\sqrt{\rho(1 - \rho)}MZ_i + (1 - \rho)Z_i^2) \\ &= \rho E(M^2) + 2\sqrt{\rho(1 - \rho)}E(M)E(Z_i) + (1 - \rho)E(Z_i^2) \\ &= \rho \cdot 1 + 0 + (1 - \rho) \cdot 1 \\ &= 1 \end{aligned} \quad (13)$$

In the above, we have used the independence of M and Z_i , as well as the fact that the variance of M is 1. Therefore, $X_i \sim N(0, 1)$ as well. Doing the equivalent calculation between X_i and X_j , one obtains $cov(X_i, X_j) = \rho \equiv \Sigma_{ij}$ for $i \neq j$. According to these [notes](#), we can convince ourselves that the collection of X_i forms a normal random vector, with Cholesky Decomposition $\Sigma = AA^T$.

Now, let's classify a default as when $X_i < \bar{x}_i$, for some threshold \bar{x}_i . Denoting ϕ as the

normal CDF, the probability of this happening is:

$$P(X_i < \bar{x}_i) \equiv \int_{-\infty}^{\infty} 1(X_i < \bar{x}_i) d\phi(x) \quad (14)$$

The integral above is the Rieman-Stieltjes (RS) integral. Given a function f and a CDF g , the RS integral

$$\int_a^b f(x) dg(x) \quad (15)$$

is to be calculated by taking the limit

$$S(P, f, g) = \sum_{j=0}^{n-1} f(c_j)[g(x_{j+1}) - g(x_j)] \quad (16)$$

when the norm of the partition (i.e. length of longest $x_{j+1} - x_j$ subinterval) tends to 0. The $\{x_j\}$ endpoints are the partition, and $c_j \in [x_j, x_{j+1}]$.

Applying this sum to our example for a given partition P which includes \bar{x}_i as one of the endpoints, we have:

$$\begin{aligned} P(X_i < \bar{x}_i) &\equiv \int_{-\infty}^{\infty} 1(X_i < \bar{x}_i) d\phi(x) \\ &= (\phi(x_1) - \phi(x_0)) + (\phi(x_2) - \phi(x_1)) + \cdots + (\phi(\bar{x}_i) - \phi(x_l)) \\ &= \phi(\bar{x}_i) - \phi(x_0) \\ &= \phi(\bar{x}_i) - \phi(-\infty) \\ &= \phi(\bar{x}_i) \\ &\equiv q \end{aligned} \quad (17)$$

This is true when we shrink the partition size to 0. In the above, we used the fact that the terms in the telescoping sum cancel out, that $f(c)$ is 0 when $c > \bar{x}_i$, and that $\phi(-\infty) = 0$ since ϕ is a CDF.

Let's now revisit our derivation of $P(X_i < \bar{x}_i)$, but let's consider X_i to be as in Eq. [12](#). In particular, let's fix $M = m$. By doing this, $X \sim N(0, 1)$ is no longer true. We have instead $X \sim N(\sqrt{\rho}m, 1 - \rho)$. We now want to calculate:

$$\begin{aligned} P(X_i(Z_i) < \bar{x}_i | M = m) &= P(\sqrt{\rho}m + \sqrt{1 - \rho}Z_i < \bar{x}_i | M = m) \\ &= P\left(Z_i < \frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1 - \rho}} | M = m\right) \\ &= \phi\left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1 - \rho}}\right) \end{aligned} \quad (18)$$

where in the last line, we have used the fact that $Z_i \sim N(0, 1)$ (similar to the derivation in Eq. [17](#)). Now, this probability depends on m , which came from a random variable. Let's now ask what is the value of $P(X_i(Z_i) < \bar{x}_i | M = m)$, averaged over all values of m :

$$\begin{aligned}
E_m(P(X_i(Z_i) < \bar{x}_i | M = m)) &= E_m \left(\phi \left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}} \right) \right) \\
&= \int_{-\infty}^{\infty} \phi \left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}} \right) d\phi(m) \\
&= \int_{-\infty}^{\infty} \phi \left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}} \right) \phi'(m) dm \quad (\text{since } \phi \text{ is continuous}) \\
&= \int_{-\infty}^{\infty} \phi \left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}} \right) \frac{e^{-m^2/2}}{\sqrt{2\pi}} dm \\
&= \int_{-\infty}^{\infty} \int_{-\infty}^{\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}}} \frac{e^{-y^2/2}}{\sqrt{2\pi}} \frac{e^{-m^2/2}}{\sqrt{2\pi}} dy dm \\
&= \int_{-\infty}^{\bar{x}_i} \frac{e^{-z^2/2}}{\sqrt{2\pi}} dz \\
&= \phi(\bar{x}_i)
\end{aligned} \tag{19}$$

We obtain the same thing as in [17](#). This is somewhat surprising, but not really if you think about it. Note that to show that the $dy dm$ integral equals the dz integral, one can take a derivative of each line with respect to \bar{x}_i and use the fundamental theorem of calculus & chain rule. It will then be fairly easy to show equality. This means that the un-differentiated lines are equal up to a constant independent of \bar{x}_i . You can then take $\bar{x}_i = \infty$ to show that the constant is 0.

Let's define:

$$\begin{aligned}
g(m) &= P(X_i(Z_i) < \bar{x}_i | M = m) - E_m(P(X_i(Z_i) < \bar{x}_i | M = m)) \\
&= \phi \left(\frac{\bar{x}_i - \sqrt{\rho}m}{\sqrt{1-\rho}} \right) - \phi(\bar{x}_i)
\end{aligned} \tag{20}$$

By construction and also by the proofs above, $E_m g(m) = 0$. Since $M \sim N(0, 1)$, it is true that in 99% of samples, $M > \phi^{-1}(0.01) = \inf(v : \phi(v) \geq 0.01)$. Since ϕ is monotonic, we have that in 99% of cases,

$$\begin{aligned}
g(m) &< g(\phi^{-1}(0.01)) \quad (99\% \text{ CL}) \\
&\equiv WCDR - PD
\end{aligned} \tag{21}$$

where $PD = \phi(\bar{x}_i)$. This is the term that shows up in the RWA capital. Instead of WCDR-PD, one could have defined this measure of default in many other ways, and it's unclear why they chose to subtract PD.

6 Copulas

In practice, we don't measure probability of defaults according to X_i , but rather according to T . So we introduce $F_i(T_i)$, which is the marginal CDF that the counterparty hasn't defaulted by time T_i . So how do we relate $F_i(T_i)$ to all the previous formalism? Copulas (see [notes](#)).

Copula: A d -dimensional copula, $C : [0, 1]^d \rightarrow [0, 1]$ is a cumulative distribution function (CDF) with uniform marginals.

Sklar's theorem: Consider a d -dimensional CDF, F_N , with marginals F_1, \dots, F_n . Then there exists a copula, C , such that $F_N(t_1, \dots, t_n) = C(F_1(t_1), \dots, F_n(t_n))$ for all $x_i \in [-\infty, \infty]$ and $i = 1, \dots, n$. If F_i is continuous for all i , then C is unique.

So a copula is just a function with n arguments (the marginal CDFs) that completely determine the d -dimensional CDF. This is simple to understand, but surprising that it's true. Let's assume that the full joint multivariate non-normal distribution of t is given by $F_N(t_1, \dots, t_n)$ and is continuous, and the full multivariate normal distribution of X_i is given by $\phi_N(X_1, \dots, X_n)$ (this *is* continuous). Let's make a bold assumption that the copula of F_N and the copula of ϕ_N are equal. We also introduce $u_i = F_i(t_i)$. We then have:

$$\begin{aligned}
 P_F(T_1 < t_1, \dots, T_n < t_n) &\equiv F_N(t_1, \dots, t_n) \\
 &= F_N(F_1^{-1}(u_1), \dots, F_n^{-1}(u_n)) \\
 &= C_F(u_1, \dots, u_n) \\
 &= C_\phi(u_1, \dots, u_n) \\
 &= \phi_N(\phi_1^{-1}(u_1), \dots, \phi_n^{-1}(u_n)) \\
 &\equiv P_\phi(X_1 < \phi^{-1}(u_1), \dots, X_n < \phi_n^{-1}(u_n))
 \end{aligned} \tag{22}$$

We don't know what $P_\phi(X_1 < \phi^{-1}(u_1), \dots, X_n < \phi_n^{-1}(u_n))$ is in general since X_i are correlated to each other through M . However, conditional on $M = m$, the various $X_i(m)$ are now independent from each other. Therefore

$$P_\phi(X_1 < \phi^{-1}(u_1), \dots, X_n < \phi_n^{-1}(u_n) | M = m) = \prod_i P_{\phi_i}(X_i < \phi^{-1}(u_i) | M = m) \tag{23}$$

and finally

$$P_\phi(X_1 < \phi^{-1}(u_1), \dots, X_n < \phi_n^{-1}(u_n)) = \int_{-\infty}^{\infty} \prod_i^n P_{\phi_i}(X_i < \phi^{-1}(u_i) | M = m) d\phi(m) \tag{24}$$

7 Simulations

Going back to α in Eq. 11, we want to properly calculate the numerator $(e_i d_k + e'_j d'_l) P(d_k, d'_l, e_i, e'_j)$.

We can approach this as follows under the N-factor model.

Let $X_i = \frac{e_i - \mu(e_i)}{\sigma(e_i)}$ where e_i is our exposure to counterparty i . Let $M \rightarrow M_j$ be the returns on stock markets and CDS indices labelled by j , $\sqrt{\rho} \rightarrow a_{ij}$ be the correlation between e_i and M_j , $\bar{x}_i = \phi^{-1}(PD) = \phi^{-1}(F_i(t_i))$ be the historical PD of this counterparty (based on credit rating). Assume our simulation is a monte carlo that simulates certain risks factors (FX rates, IR rates, etc) according to a scenario s at future time steps t and re-values the portfolio to obtain $e(s, t)$. If the MC also simulate $M_j = m(s, t)$, then for each s and t , we can multiply $e(s, t)$ by

$$P_\phi(X_1 < \phi^{-1}(u_1), \dots, X_n < \phi_n^{-1}(u_n) | M = m(s, t)) \quad (25)$$

We can then proceed to aggregate these probability weighted $e(s, t)$ exposures. To capture the WCDR, the correlations a_i and historical default probabilities PD_i can be calibrated according to historical stress periods.