Benmelech and Dlugosz THE CREDIT RATING CRISIS NBER working paper 15045

Introduction

This paper characterizes the 2007–2008 downturn of the US economy which had world wide impact, as a "credit rating crisis" and attempt to provide evidence that ratings shopping by producers of structured finance products may have played role in the crisis.

By examining the changes in the credit ratings of ABS CDOs, they show that tranches rated solely by one agency, and by S&P in particular, were more likely to be and more severely downgraded by January 2008. As of October 2008, Citigroup, AIG, and Merrill Lynch took write-downs totaling \$34.1 billion, \$33.2 billion, and \$26.1 billion, respectively, due to ABS CDO exposure. While these are extremely large in absolute size, they amount to just about 1% of the structured finance securities (\$11 trillion dollars).

Using micro-level data on the collateral composition of ABS CDOs they find three features of ABS CDOs:

- 1. a high concentration in residential housing on average 70% of the underlying securities were residential mortgage backed securities or home equity loan securities and 19% were CDO tranches backed by housing assets,
- 2. high exposure to the most risky segment of residential housing: 54.7% of the assets of ABS CDOs were invested in home equity securities.
- 3. Low inter-vintage diversification: about 75% of ABS CDOs were comprised of mortgages that were originated in 2005 and 2006.

1 Securitization and AAA rating

Two types of securitization:

- 1. pass-through securitizations: the issuer pools a set of assets and issues securities to investors backed by cash flows. A single type of security is issued so that an investor holds a proportional claim on the underlying assets.
- 2. tranched securitizations: After pooling a set of assets, the issuer creates several different classes of securities (tranches) with prioritized claims on the collateral. Some investors hold more senior claims than others. (theoretically tranching is justified via asymmetric information, financial regulations, and via behavioral economics.)

2 Structured Finance Background

Structured finance is developed in order to fund the growing demand for housing in the late 1970s and 1980s. Because there was a concern about the ability of savings and loans (thrifts) to meet the demand, Wall Street attempted to address the demand by creating an alternative, more efficient funds. In January 2008, there were 111,988 individual rated tranches outstanding worldwide.

2.1 Common Structured Finance Products

- Collateralized debt obligations (CDOs) are structured finance securities that are pooled and tranched. CDOs are backed by a pool of assets, like other structured finance securities, but they issue classes of securities with some investors having priority over others.
- Collateralized bond obligations (CBOs) are CDOs backed primarily by high-yield corporate bonds.
- Collateralized loan obligations (CLOs) are CDOs backed primarily by leveraged high-yield bank loans.
- Collateralized mortgage obligations (CMOs) are CDOs backed by mortgage collateral (often RMBS or CMBS rather than individual mortgages)
- Asset-backed securities (ABS) are the general term for bonds or notes backed by pools of assets rather than a single corporation or government. Common types of collateral for ABS are auto loan receivables, student loan receivables, etc. ABS appear in our sample because they are sometimes used as collateral for CDOs.
- Mortgage-backed securities (MBS) are asset-backed securities whose cash flows are backed by the principal and interest payments of a set of mortgage loans. MBS can be divided into residential mortgage-backed securities (RMBS) and commercial mortgage-backed securities (CMBS), depending on the type of property underlying the mortgages.
- Home Equity Loans securities (HEL) are residential mortgage-backed securities whose cash flows are backed by a pool of home equity loans.

3 Data and Summary Statistics

3.1 Sample Construction

Analysis uses three data sets: (i) Moody's Structured Finance Default Risk Services database, (covers all structured finance products issued since 1982) Sample of products rated by Moody's. 7 broad deal types: ABS, CDO, CMBS, MBS, PF (Public Finance), RMBS, and Other. (ii) Moody's Corporate Default Risk Services database (covers 11,000 corporate entities, including 380,000 debts during 1970–September 2008, and (iii) Pershing Square's Open Source Research (data on CDOs of ABS that were insured by MBIA or AMBAC issued during 2005–2007.

3.2 The Evolution of the Structured Finance Market

Table 1 displays the evolution of the structured finance market across deal types from 1983 to 2008. Table 1 demonstrates, CDOs have been the fastest growing sector of the structured finance market between 2003 and 2006; the number of CDO tranches issued in 2006 (9,278) was almost twice the number of tranches issued in 2005 (4,706).

Table 1: Structured Finance Tranche Issuance By Year and Type

Year	ABS(%)	CDO(%)	CMBS(%)	MBS(%)	PF(%)	RMBS(%)	Other(%)	Number of deals
1983	0	0	0	100.0	0	0	0	1
1984	16.7	0	0	16.7	0	66.7	0	6
1985	3.6	0	0	0	0	96.4	0	28
1986	9.1	0	0	0	0	90.4	0	77
1980	9.1 11.3	_	0	-	0	90.9 88.7		142
		0	-	0			0	
1988	11.3	0	0.3	0	0	88.3	0	300
1989	10.6	0.1	0.9	0.1	0.1	87.8	0.3	705
1990	13.4	0.7	1.0	0.1	0.2	83.8	0.9	1,010
1991	18.5	1.1	1.0	0.3	0.2	77.9	1.2	1,333
1992	22.6	1.0	1.2	0.3	0.2	73.2	1.5	1,704
1993	25.3	0.8	1.9	0.2	0.3	69.5	2.0	$2{,}105$
1994	26.4	1.9	2.3	0.2	0.5	66.6	2.2	2,571
1995	29.8	1.8	2.6	0.2	0.8	62.1	2.7	2,988
1996	32.7	1.7	2.6	0.2	1.6	56.3	4.9	3,567
1997	37.0	2.1	2.7	0.2	4.1	49.4	4.5	4,088
1998	37.7	3.3	3.0	0.1	8.1	40.9	6.9	5,050
1999	38.2	4.5	3.5	0.1	13.0	33.6	7.2	6,010
2000	39.0	6.1	4.0	0.1	14.7	28.2	7.8	6,856
2001	39.0	7.4	4.5	0.1	15.1	25.3	8.5	7,667
2002	37.9	8.9	5.1	0.1	14.9	23.6	9.5	8,704
2003	36.8	10.8	5.4	0.1	14.7	22.1	10.2	9,893
2004	35.6	13.5	5.6	0.1	14.6	19.8	10.8	10,964
2005	34.1	15.5	5.8	0.1	15.0	18.8	10.8	12,208
2006	31.6	16.6	5.8	0	16.5	20.2	9.3	14,371
2007	29.4	18.9	5.8	0	16.5	21.0	8.3	16,890
2008 (a)	26.3	20.4	5.5	0	20.0	20.8	7.1	19,715

This table presents percent of total issuance by number for main deal types as well as total issuance by number. (a) Rating actions as of 9/22/2008.

Figure 1 illustrates the dramatic growth in the dollar value of global CDOs issued compared to all mortgage-related securities. CDO issuance fell to its lowest level since the mid-1990s, with a total of 53.1 billion dollars. Likewise, the number of all new structured finance tranches issued between January and September 2008 fell to 6,644 from a peak of 47,055 tranches in 2006.

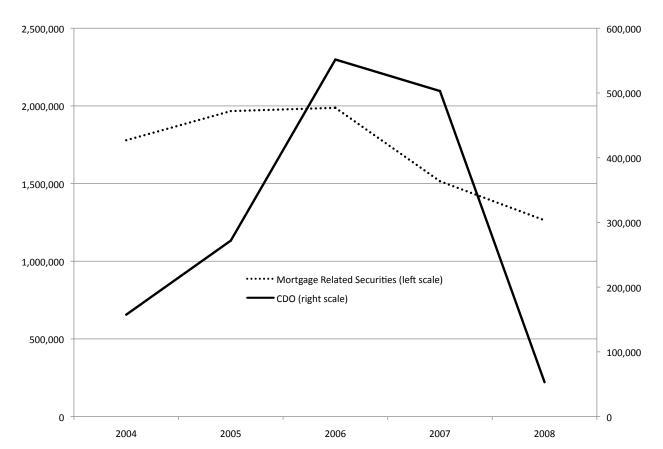


Figure 1: CDO and Mortgage-related securities Issuance 2004-2008

4 Credit Rating: Structured Finance vs. Corporate Bonds

4.1 Credit Rating Transitions of Structured Finance Products

Table 2 and Figure 2a display the behavior of structured finance rating transitions over time. As Table 2 shows, the number of downgrades and upgrades were roughly similar before 2002.

Table 2 also reports the average magnitude of downgrades and upgrades, where a change of one notch (say from A2 to A3) is coded as -1.0. For example a downgrade from Aa2 to A2 would be coded as -3.0 (moving from Aa2 to Aa3 to A1, and then to A2). In 2002 and 2003, the number of downgrades rose dramatically and exceeded the number of upgrades. Many collateralized bond obligations were downgraded during this time as corporate credit quality deteriorated in the economic slowdown of 2001-2002. Downgrades again fell below upgrades during the structured finance boom of 2005 and 2006.

 $\begin{array}{c} {\rm Table~2:} \\ {\bf Structured~Finance~Upgrades~and~Downgrades} \end{array}$

Panel	۸. ۲	Total	Hnor	adoc	and	D_{α}	wnore	*20h
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Cohort formed:	Rated	DNG	DNG	UPG	UPG	WR	WR
	Tranches	#	Avg. change**	#	Avg. change	#	percent
1/1/90	2,825	85	-1.2	-	0.0	48	1.7%
1/1/91	3,993	155	-1.2	-	0.0	124	3.1%
1/1/92	5,571	87	-1.8	122	2.1	828	14.9%
1/1/93	7,290	149	-1.5	131	1.5	1,336	18.3%
1/1/94	9,320	192	-2.8	237	1.9	1,038	11.1%
1/1/95	11,083	148	-2.0	352	1.7	637	5.7%
1/1/96	13,403	175	-2.7	272	1.9	1,065	7.9%
1/1/97	15,298	49	-1.5	439	1.5	1,100	7.2%
1/1/98	18,214	447	-2.4	366	2.0	1,924	10.6%
1/1/99	20,419	330	-3.6	380	2.2	2,169	10.6%
1/1/00	23,358	463	-1.5	642	2.3	2,235	9.6%
1/1/01	26,905	476	-2.5	557	1.7	3,084	11.5%
1/1/02	31,901	1,847	-2.9	720	1.8	4,598	14.4%
1/1/03	38,147	2,515	-3.1	699	2.5	7,920	20.8%
1/1/04	43,476	1,798	-3.6	1,216	2.4	6,953	16.0%
1/1/05	52,843	874	-2.5	2,202	2.2	6,878	13.0%
1/1/06	71,462	986	-2.5	2,748	2.3	7,085	9.9%
1/1/07	94,127	8,109	-4.7	2,990	1.9	6,692	7.1%
1/1/2008^	442,908	36,880	-5.6	1,269	2.4	6,380	1.4%

Panel B: Tranches Affected

Cohort formed:	Rated	DNG	DNG	UPG	UPG	UPG&DNG	UPG&DNG
	Tranches	# of tranches	% of tranches	# of tranches	% of tranches	# of tranches	percent
1/1/90	2,825	80	2.8%	-	0.0%	-	0.0%
1/1/91	3,993	154	3.9%	-	0.0%	-	0.0%
1/1/92	5,571	84	1.5%	121	2.2%	-	0.0%
1/1/93	7,290	145	2.0%	131	1.8%	18	0.2%
1/1/94	9,320	181	1.9%	236	2.5%	1	0.0%
1/1/95	11,083	134	1.2%	350	3.2%	-	0.0%
1/1/96	13,403	144	1.1%	269	2.0%	-	0.0%
1/1/97	15,298	46	0.3%	439	2.9%	-	0.0%
1/1/98	18,214	371	2.0%	359	2.0%	2	0.0%
1/1/99	$20,\!419$	311	1.5%	374	1.8%	4	0.0%
1/1/00	$23,\!358$	401	1.7%	638	2.7%	6	0.0%
1/1/01	26,905	421	1.6%	545	2.0%	5	0.0%
1/1/02	31,901	1,298	4.1%	710	2.2%	5	0.0%
1/1/03	38,147	1,947	5.1%	681	1.8%	20	0.1%
1/1/04	$43,\!476$	1,634	3.8%	1,168	2.7%	9	0.0%
1/1/05	$52,\!843$	737	1.4%	2,138	4.0%	8	0.0%
1/1/06	$71,\!462$	885	1.2%	2,495	3.5%	14	0.0%
1/1/07	94,127	6,801	7.2%	2,834	3.0%	88	0.1%
1/1/2008(a)	442,908	29,545	6.7%	1,254	0.3%	464	0.1%

^{*} A single tranche downgraded k times in the year shows up k times. Tranches that are downgraded and withdrawn show up in the dng column and the wr column. This is in contrast to Moodys method where a tranche that is downgraded then withdrawn in the same year only shows up as withdrawn. ** Average size of a single downgrade action on a tranche (not just the difference in rating between beginning of year and end of year) (a) Rating actions as of 9/22/2008.

Figure 2a
Number of Downgrades vs. Upgrades of Structured Finance Products

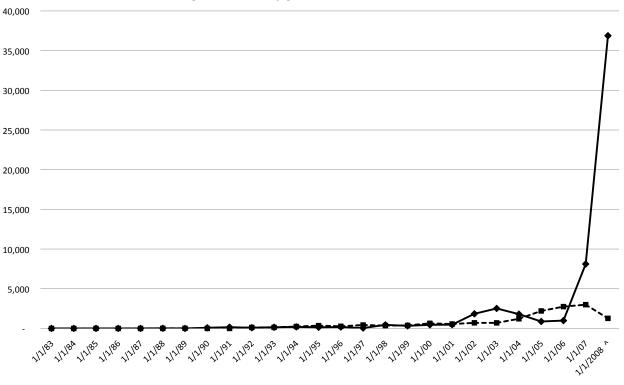
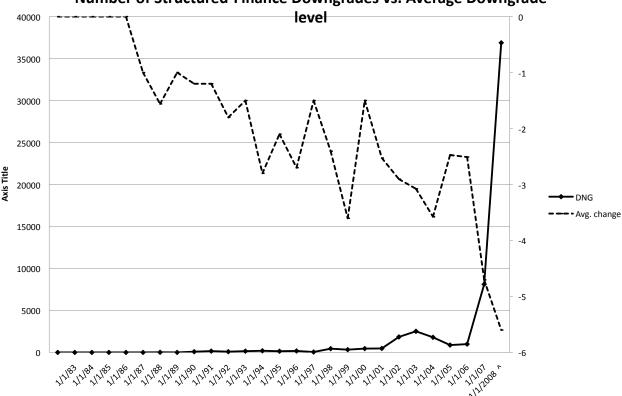


Figure 3a
Number of Structured-Finance Downgrades vs. Average Downgrade

DNG n ----UPG n



4.2 Credit Rating Transitions of Corporate Bonds

The total number of upgrade and downgrade actions on corporate bonds are reported in Panel A of Table 3, and the number of securities affected by ratings actions in Panel B.

Cohort formed:	Rated	DNG	DNG	UPG	UPG	WR	WR
Conort formed.	Bonds	#	Avg. change**	#	Avg. change**	#	percent
1/1/90	3,016	349	-1.5	287	1.3	321	10.6%
1/1/91	3,115	343	-1.4	231	1.4	326	10.5%
1/1/92	3,582	582	-1.4	141	1.4	621	17.3%
1/1/93	3,899	465	-1.3	142	1.6	772	19.8%
1/1/94	4,229	398	-1.3	264	1.4	435	10.3%
1/1/95	4,599	342	-1.3	426	1.3	445	9.7%
1/1/96	5,124	441	-1.3	457	1.3	520	10.1%
1/1/97	6,727	732	-1.2	522	1.3	754	11.2%
1/1/98	8,514	1,524	-1.6	577	1.3	985	11.6%
1/1/99	10,623	2,137	-1.5	800	1.5	1,117	10.5%
1/1/00	11,867	1,752	-1.6	898	1.6	1,398	11.8%
1/1/01	12,437	3,190	-1.7	807	1.5	1,989	16.0%
1/1/02	12,885	5,027	-1.8	431	1.5	2,068	16.0%
1/1/03	13,056	2,453	-1.6	611	1.4	2,579	19.8%
1/1/04	13,523	1,233	-1.3	1,540	1.5	2,425	17.9%
1/1/05	13,305	1,424	-1.5	1,626	1.4	2,425	18.2%
1/1/06	12,727	2,107	-1.3	1,687	1.2	2,082	16.4%
1/1/07	12,586	1,539	-1.4	1,869	1.2	1,851	14.7%
1/1/2008 (a)	12,753	1,482	-2.2	367	1.3	1,517	11.9%

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Cohort formed:	Rated Bonds	DNG # of Bonds	DNG % of Bonds	UPG # of Bonds	UPG % of Bonds	UPG&DNG # of Bonds	UPG&DNG percent
1/1/90	3,016	326	10.8%	285	9.4%	3	0.1%
1/1/91	3,115	319	10.2%	209	6.7%	7	0.2%
1/1/92	3,582	537	15.0%	138	3.9%	6	0.2%
1/1/93	3,899	420	10.8%	130	3.3%	2	0.1%
1/1/94	4,229	361	8.5%	251	5.9%	12	0.3%
1/1/95	4,599	310	6.7%	420	9.1%	3	0.1%
1/1/96	5,124	410	8.0%	443	8.6%	4	0.1%
1/1/97	6,727	550	8.2%	516	7.7%	7	0.1%
1/1/98	8,514	1,271	14.9%	555	6.5%	11	0.1%
1/1/99	10,623	1,865	17.6%	771	7.3%	36	0.3%
1/1/00	11,867	1,429	12.0%	870	7.3%	37	0.3%
1/1/01	12,437	2,241	18.0%	778	6.3%	43	0.3%
1/1/02	12,885	3,885	30.2%	416	3.2%	23	0.2%
1/1/03	13,056	2,211	16.9%	591	4.5%	22	0.2%
1/1/04	13,523	1,069	7.9%	1,459	10.8%	34	0.3%
1/1/05	13,305	1,149	8.6%	1,520	11.4%	23	0.2%
1/1/06	12,727	1,767	13.9%	1,555	12.2%	162	1.3%
1/1/07	12,586	1,411	11.2%	1,802	14.3%	41	0.3%
1/1/2008 (a)	12,753	1,332	10.4%	367	2.9%	5	0.0%

^{*} A single bond downgraded k times in the year shows up k times. Bonds that are downgraded and withdrawn show up in the dng column and the wr column. This is in contrast to Moodys method where a bond that is downgraded then withdrawn in the same year only shows up as withdrawn. ** Average size of a single downgrade action on a bond (not just the difference in rating between beginning of year and end of year) (a) Rating actions as of 9/22/2008.

Figure 2b
Number of Downgrades vs. Upgrades of Corporate Bonds

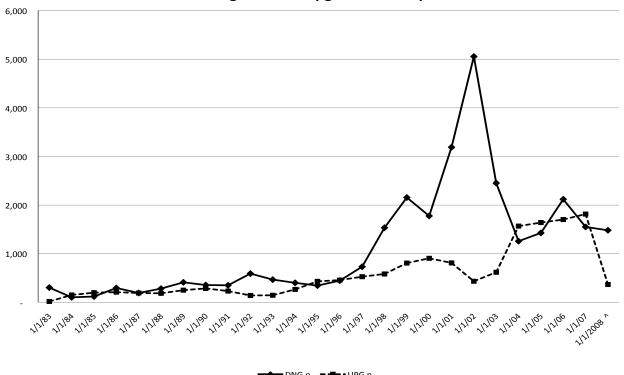
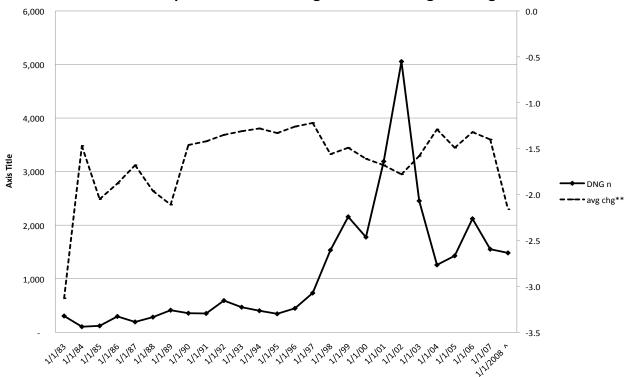


Figure 3b
Number of Corporate Bonds Downgrades vs. Average Downgrade level



The authors claim that these results suggest that corporate bonds rating were well calibrated to the underlying economic risk of the issuer whereas the initial distribution of structured finance credit ratings was inflated.

4.3 The Structured Finance Credit Rating Crisis

In 2007-2008, nearly 95% of all downgrades were tied to RMBS, ABS, or CDO securities.

Table 4: Structured Finance Downgrades by Cohort and Deal Type

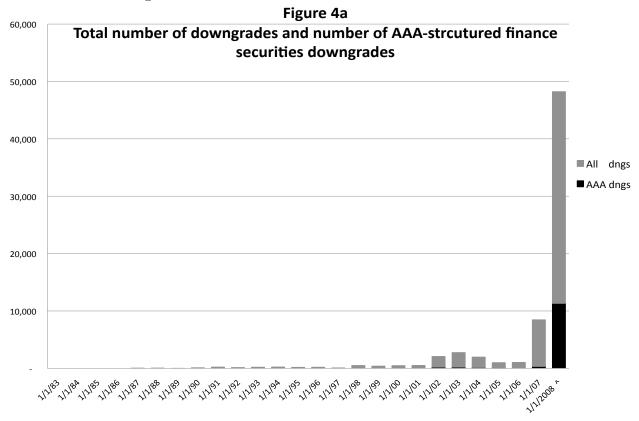
Cohort formed:	Rated	ABS	ABS	CDO	CDO	CMBS	CMBS	RMBS	RMBS
	n (dng)	n(dng)	%(dng)	n(dng)	%(dng)	n(dng)	%(dng)	n(dng)	%(dng
1987	1	-	0%	-	0%	-	0%	-	0%
1988	15	8	53%	-	0%	-	0%	2	13%
1989	1	1	100%	-	0%	-	0%	-	0%
1990	85	10	12%	-	0%	2	2%	72	85%
1991	155	12	8%	-	0%	2	1%	136	88%
1992	87	31	36%	2	2%	11	13%	41	47%
1993	149	14	9%	-	0%	-	0%	129	87%
1994	192	12	6%	-	0%	26	14%	150	78%
1995	148	1	1%	1	1%	34	23%	91	61%
1996	175	55	31%	-	0%	42	24%	76	43%
1997	49	15	31%	3	6%	3	6%	15	31%
1998	447	239	53%	43	10%	3	1%	35	8%
1999	330	179	54%	55	17%	6	2%	37	11%
2000	463	169	37%	53	11%	20	4%	10	2%
2001	476	131	28%	194	41%	20	4%	-	0%
2002	1847	544	29%	893	48%	174	9%	5	0%
2003	2515	1427	57%	699	28%	200	8%	24	1%
2004	1798	1126	63%	316	18%	229	13%	21	1%
2005	874	231	26%	210	24%	153	18%	80	9%
2006	986	423	43%	277	28%	119	12%	44	4%
2007	8109	5246	65%	1057	13%	85	1%	1388	17%
2008 (a)	36880	12522	34%	8086	22%	257	1%	13492	37%

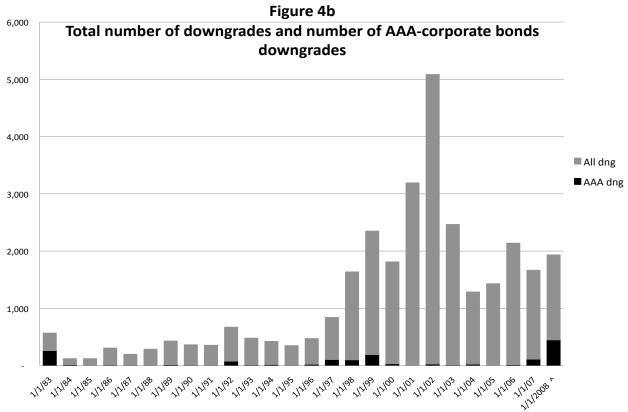
 $\begin{array}{c} \text{Table 5:} \\ \textbf{Asset Types with Most Downgrades} \end{array}$

	Ty	pes with most downg	${ m grades}$ (1s	t)	Types with most d	owngrade	es (2nd)
Year:	total(dng)	Asset type	n(dng)	%(dng)	Asset type	n(dng)	%(dng)
1990	85	MBS - 1st Mortgage	70	82%	ABS	3	4%
1991	155	${ m MBS}$ - 1st Mortgage	133	86%	ABS	4	3%
1992	87	MBS - 1st Mortgage	31	36%	CMBS	11	13%
1993	149	${ m MBS}$ - 1st Mortgage	130	87%	ABS	3	2%
1994	192	MBS - 1st Mortgage	143	74%	CMBS	16	8%
1995	148	MBS - 1st Mortgage	80	54%	CMBS	23	16%
1996	175	MBS - 1st Mortgage	70	40%	HEL - Other	55	31%
1997	49	MBS - Resecuritized	12	24%	Other - Repackaged	9	18%
1998	447	HEL - Other	98	22%	ABS	80	18%
1999	330	HEL - Other	94	28%	ABS	50	15%
2000	463	PF - FS IRBs	130	28%	ABS	100	22%
2001	476	High-Yield CBO	97	20%	CDO - Balance Sheet	57	12%
2002	1847	High-Yield CBO	566	31%	ABS	198	11%
2003	2515	ABS	677	27%	ABS	327	13%
2004	1798	ABS	425	24%	ABS	367	20%
2005	874	Other - Structured	146	17%	CMBS	126	14%
2006	986	HEL	290	29%	CDO - Synthetic	125	13%
2007	8109	HEL	4405	54%	MBS - 1st Mortgage	1342	17%
2008	36880	MBS - 1st Mortgage	13015	35%	$_{ m HEL}$	9459	26%

(a) Rating actions as of 9/22/2008.

Another unique aspect of the downgrade wave of structured finance products in 2007 and 2008 is its concentration amongst AAA-rated tranches.





4.4 Fallen Angels

Next the paper examines structured finance securities that suffered the most severe downgrades. From 1983 to 2008, 11% of tranches were eventually downgraded 8 or more notches (fallen angels), affecting 11% of deals. Table 6, Panel B decomposes these fallen angel tranches by their original credit rating.

 $\begin{array}{c} \text{Table 6:} \\ \textbf{Fallen Angels} \end{array}$

			- · · · · · · · · · · · · · · · · · · ·
		Panel A:	Fallen Angles 1983-2008
Number of	Number of	Fallen	Fallen
tranches	deals	tranches	deals
179,760	33,978	19,421	3,879

Panel B: Falle	;				
Initial Rating	Number	Percent	Vintage	Number	Percent
AAA	3,707	19%	1983-1996	171	1%
Aa1	992	5%	1997	58	0%
Aa2	1,809	9%	1998	113	1%
Aa3	1,221	6%	1999	153	1%
A1	1,058	5%	2000	140	1%
A2	2,036	10%	2001	170	1%
A3	1,421	7%	2002	318	2%
Baa1	1,403	7%	2003	304	2%
Baa2	2,421	12%	2004	405	2%
Baa3	1,735	9%	2005	842	4%
Ba1	805	4%	2006	3,127	16%
Ba2	738	4%	2007	5,404	28%
Ba3	75	0%	2008	8,216	42%
Total	19,421	100%		19,421	100%

Panel Da	Fallen Angels b	oy Deal Type	Panel E: Asset Types with Most Fallen Angels					
Deal	Number	Percent	Asset Type	Number	Percent			
ABS	8,752	45%	HEL - Closed-End - Not High LTV	$6,\!662$	34%			
RMBS	6,218	32%	MBS - First Mortgage	6,037	31%			
CDO	4,111	21%	ABS CDO - Cash Flow	1,729	9%			
Other	249	1%	ABS CDO - Synthetic	1,318	7%			
CMBS	49	0%	HEL - $\operatorname{Closed-End}$ - High LTV	813	4%			
PF	42	0%	ABS CDO - Other	509	3%			
Total	19,421	100%						
					-			

5 The Collapse of ABS CDO's Credit Ratings

5.1 What are ABS CDOs?

ABS CDOs (first issued in 1999) were initially diversified and collateralized by ABS from different sectors such as: aircraft ABS, mutual fund fees, manufactured housing. However since 2003 the primary asset classes backing ABS CDOs have been subprime and non-conforming RMBS and CDO tranches.

ABS CDOs are broadly classified into 2 categories:

- 1. High Grade ABS CDOs which are backed by AA and A-rated collateral, and
- 2. Mezzanine ABS CDOs that are backed by BBB collateral.

"Because of the commonly held belief was that the risk of default for high grade collateral was close to zero, the credit support for a triple-B note can be less than 1%. Such a highly leveraged structure, however, leaves little room for error, not only for the default risk, but also for the timing of the cash flows. High grade (HG) ABS CDOs are highly leveraged, and larger, typically between \$1 billion to \$3 billion. Mezzanine ABS CDOs are typically smaller than High Grade ABS CDOs, with deal sizes ranging from 300million to 1.5 billion.

5.2 The Collateral Structure of ABS CDO

Table 7 reports summary statistics on the 534 collateral pools including the weighted average rating of the underlying assets (weighted by the par value of the underlying securities) and a breakdown by asset type and vintage.

Table 7:
ABS CDO Collateral structure

	Mean	25th Percentile	Median	75th Percentile	Standard Deviation	Min	Max
Collateral amount (million)	\$1,006.7	\$492.8	\$849.7	\$1,283.3	\$916.9	\$100.0	\$11,132.2
Number of collateral securities	149.7	103	137	182	73.1	26	990
Collateral weighted-average cred	it rating						
S&P	A	BBB+	A-	AA	N/A	BBB-	AAA
Moody's	A2	Baa2	A3	Aa2	N/A	Baa3	Aaa
Collateral share by asset type:							
CDO	18.8%	3.2%	9.3%	22.6%	25.9%	0.0%	100.0%
Home Equity ABS	54.7%	36.3%	59.9%	83.3%	31.8%	0.0%	100.0%
RMBS	15.0%	0.0%	9.0%	21.5%	19.8%	0.0%	100.0%
CMBS	4.6%	0.0%	0.0%	3.8%	13.1%	0.0%	100.0%
Collateral share by mortgage typ	e:						
Prime	8.2%	0.0%	4.5%	11.2%	12.2%	0.0%	91.8%
Midprime	29.7%	13.2%	29.1%	45.0%	20.2%	0.0%	77.5%
Alt-A	5.2%	0.0%	2.0%	7.1%	8.0%	0.0%	72.6%
Subprime	24.2%	13.1%	24.8%	34.5%	16.3%	0.0%	100.0%
$Collateral\ vintage$							
2005H1	15.3%	2.4%	8.5%	22.4%	17.9%	0.0%	96.1%
2005H2	21.0%	4.9%	16.9%	31.8%	18.4%	0.0%	96.7%
2006H1	23.4%	4.8%	21.8%	37.3%	19.7%	0.0%	100.0%
2006H2	15.9%	1.3%	8.4%	26.4%	18.0%	0.0%	90.5%
2007H1	7.3%	0.0%	2.4%	7.9%	12.4%	0.0%	93.4%
2007H2	0.9%	0.0%	0.0%	0.6%	1.9%	0.0%	13.8%

Figure 5a: ABX1 (2006H1 Vintage) Prices by Rating

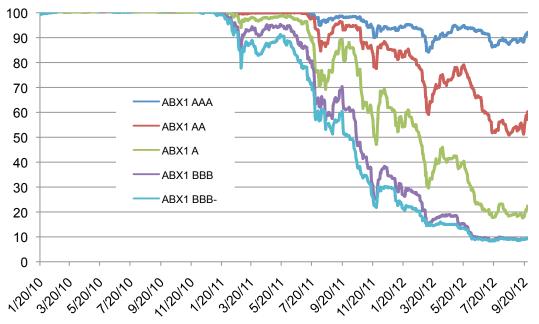
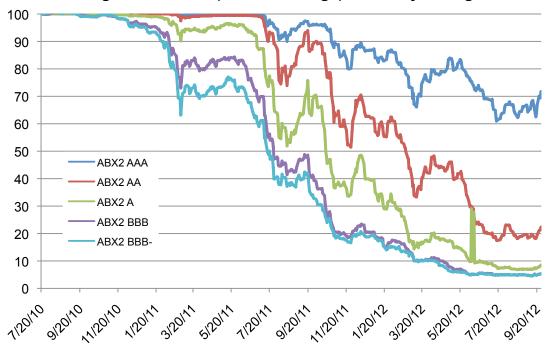


Figure 5b: ABX2 (2006H2 Vintage) Prices by Rating



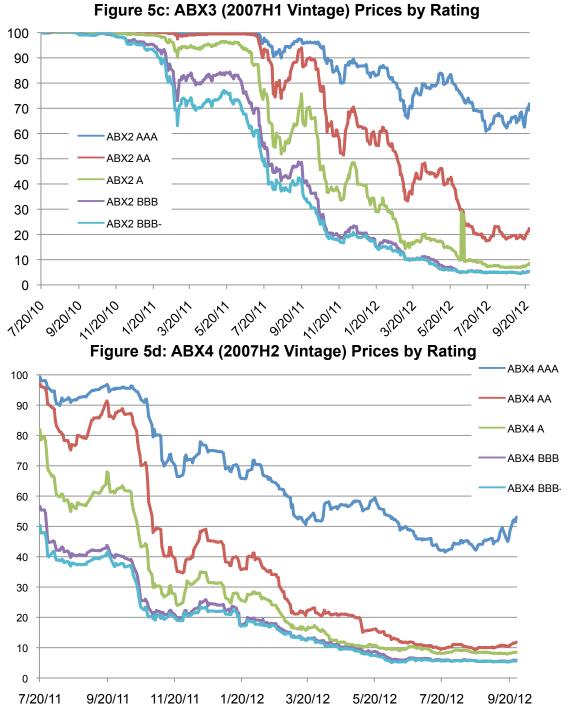


Table 8 decomposes the collateral in high grade and mezzanine ABS CDOs by vintage.

Table 8: Collateral Vintage by Credit Rating

		weighted average &P rating	Corresponding ABX price (as of September 25, 2008)		
	ABS High Grade A	CDO Grade Mezzanine Grade BBB	High - Mezzanine difference (t-test)	A	BBB
$Collateral\ vintage$					
2005H1	15.7% [7.9%]	16.0% [9.9%]	-0.003 (-0.27)	N/A N/A	N/A N/A
2005H2	21.0% [16.0%]	22.7% [22.1%]	-0.017 (-0.89)	N/A N/A	N/A N/A
2006H1	21.6% [16.8%]	28.6% [29.1%]	-0.070 *** (-3.99)	22.42	9.44
2006H2	16.5% [7.5%]	$16.2\% \\ [13.2\%]$	0.004 (0.25)	8.54	5.35
2007H1	8.4% [3.1%]	5.9% [2.1%]	0.025 ** (2.49)	7.42	5.33
2007H2	1.1% [0.0%]	$0.6\% \ [0.0\%]$	0.005 *** (3.70)	8.50	5.85
Number of CDOs	299	205	_	_	

- 1. Lack of inter-sector diversification: high concentration in residential housing on average 70% of the assets of ABS CDOs were invested in RMBS and Home Equity Securities, and 18.8% in other CDOs that are concentrated in the housing market as well.
- 2. Very high concentration in Home Equity ABS: especially the most risky segment of the sector. On Average, 54.7% of the assets of ABS CDOs are invested in home equity securities that include: first-lien subprime mortgages, second-lien home equity loans, and home equity lines of credit.
- 3. Low inter-vintage diversification: about 75% of ABS CDOs comprised of 2005H1 through 2006H2 vintages, Figures 5a and 5b shows that the 2006H1 and 2006H2 vintages performed miserably since summer 2007.

5.3 The Consequences of the ABS CDOs Collapse

Table 9 provides information on aggregate crisis related write-downs as well as write-downs for some of the largest financial institutions in the world.

Table 9: ABS CDOs and Write-Downs

	latest announcement	ABS CDOs	Corporate credit	RMBS	Other	Total
Insurers/Asset managers						
ACA Capital	11/8/2007	1,700	-	-	-	1,700
AIG	11/10/2008	33,190	-	-	33,753	66,943
Ambac	11/5/2008	11,136	360	1,046	219	12,761
MBIA	5/12/2008	3,500	1,600		1,800	6,900
Prudential	7/30/2008	-	-	3,410	-	3,410
North American Banks						
Bank of America	1/16/2009	9,089	932	-	2,834	12,855
Bear Streams	1/29/2008	2,300	-	-	-	2,300
Citigroup	10/16/2008	34,106	4,053	1,319	15,904	55,382
Goldman Sachs	9/16/2008	-	4,100	1,700	1,400	7,200
JP Morgan Chase	1/15/2009	1,300	5,467	5,305	, -	12,072
Lehman Brothers	6/16/2008	200	1,300	4,100	3,400	9,000
Merrill Lynch	10/16/2008	26,100	2,845	12,998	13,125	55,068
Morgan Stanley	12/17/2008	7,800	3,810	3,781	1,992	17,383
European Banks						
Credit Suisse	10/23/2008	3,427	3,057	530	2,523	9,357
Deutsche Bank	10/30/2008	2,092	5,820	3,386	3,677	14,974
Fortis Bank	8/4/2008	4,359	3,660	144	, -	8,163
ING	11/12/2008	565	-	8,028	25	8,617
Royal Bank of Scotland	11/4/2008	3,609	1,849	2,566	4,122	12,146
UBS	8/12/2008	21,870	348	1,716	13,871	37,805
Asian and Emerging Market Bank	cs					
Aozora Bank	5/15/08	510.0	-	-	-	510.0
Mitsubishi UFJ	8/13/08	359.5	2,348	921	11	3,640
Mizuho	11/13/08	3,898	629	2,539	584	7,650
National Australia Bank	10/21/08	669.5	-	-	-	669.5
Sumitomo Mitsui	11/19/07	561.7	_	-	-	561.7
	l B: Aggregate C		Write-Downs	(\$ millions)		
		ABS CDOs	Corporate credit	RMBS	Other	Total
Insurers/Asset managers		61,074	6,320	10,386	38,3471	116,126
North American Banks		84,319	23,702	42,272	59,011	209,305
European Banks		63,464	18,579	26,423	62,634	171,100
Asia/Emerging markets Banks		9,358	4,724	5,728	3,743	23,553
Total		218,216	53,324	84,810	163,735	520,084

6 Why did the Ratings Collapse?

Two candidates: (1) Lax rating and rating shopping (2) Model error.

6.1 Ratings Shopping

Table 10: Number of Raters

		Number of re	aters	
	0	1	2	3
pre 2004	603	133	550	535
	(33.11%)	(7.30%)	(30.20%)	(29.38%)
2004	374	439	1,993	1,186
	(9.37%)	(11.00%)	(49.92%)	(29.71%)
2005	547	778	5,363	2,537
	(5.93%)	(8.43%)	(58.14%)	(27.50%)
2006	573	392	7,060	2,786
	(5.30%)	(3.63%)	(65.30%)	(27.77%)
2007	171	94	2,479	845
	(4.76%)	(2.62%)	(69.07%)	(23.54%)
entire period	2,888	1,857	17,721	8,033
	(9.47%)	(6.09%)	(58.10%)	(26.34%)

Panel B: Number of raters by security type

	$Number\ of\ raters$						
	0	1	2	3			
CMBS	10	16	1,116	257			
	(0.71%)	(1.14%)	(79.77%)	(18.37%)			
RMBS	463	1,371	6,768	1,065			
	(4.79%)	(14.18%)	(70.01%)	(11.02%)			
Home Equity	346	406	6,997	5,983			
	(2.52%)	(2.96%)	(50.95%)	(43.57%)			
CDO	91	35	2,909	723			
	(2.42%)	(0.93%)	(77.41%)	(19.24%)			

 $\begin{array}{c} \text{Table 11:} \\ \textbf{Most common raters} \end{array}$

Panel A: Securities rated by only one of the agencies

	Fitch	Moody's	S&P	Total
pre 2004	20	21	92	133
pre 2001	(15.04%)	(15.79%)	(69.17%)	(100.0%)
2004	66	32	341	439
	(15.03%)	(7.29%)	(77.68%)	(100.0%)
2005	97	46	635	778
	(12.47%)	(5.91%)	(81.62%)	(100.0%)
2006	162	56	174	392
	(41.33%)	(14.29%)	(44.39%)	(100.0%)
2007	29	27	38	94
	(30.85%)	(28.72%)	(40.43%)	(100.0%)
entire period	374	182	1,280	1,836
	(20.37%)	(9.91%)	(69.72%)	(100.00%)

Panel B: Securities rated by two agencies

	S&P+Moody's	S&P+Fitch	Moody's+Fitch	Total
pre 2004	402	86	62	550
	(73.09%)	(15.64%)	(11.27%)	(100.0%)
2004	1,695	225	73	1,993
	(85.05%)	(11.29%)	(3.66%)	(100.0%)
2005	4,413	566	384	5,363
	(82.29%)	(10.55%)	(7.16%)	(100.0%)
2006	6,433	313	314	7,060
	(92.12%)	(4.43%)	(4.45%)	(100.0%)
2007	2,323	75	80	2,479
	(93.71%)	(3.03%)	(3.23%)	(100.0%)
entire period	15,266	1,265	913	17,445
	(87.51%)	(7.25%)	(5.23%)	(100.00%)

Table 12: Rating Transitions and Number of Raters

	1	2	3	Total
number of downgrades	238	2,912	1,788	4,938
(downgrade %)	(12.81%)	(16.24%)	(21.84%)	(17.65%)
number of upgrades	85	561	369	1,015
(upgrade $\%$)	(4.57%)	(3.13%)	(4.51%)	(3.63%)
number unchanged	1,535	$14,\!454$	6,030	22,019
(unchanged $\%$)	(82.62%)	(80.63%)	(73.65%)	(78.72%)
Total	1,858	17,927	8,187	27,972
	(100.00%)	(100.00%)	(100.00%)	(100.00%)

Dependent	Pr(down)	Pr(down)	Pr(down)	Pr(down)	rating	rating	rating
Variable=					change	change	change
Number of raters			0.045 a	$0.086 \ a$			0.132
			(0.004)	(0.007)			(0.503)
One rater	0.061 b	0.075 b			-2.716 a	-1.808 a	
	(0.030)	(0.043)			(0.793)	(0.727)	
Two rater	-0.005				-0.909 a		
	(0.010)				(0.201)		
Three raters		0.027 a				0.909 a	
		(0.009)				(0.201)	
only S&P			0.169 a	$0.322 \ a$			-2.579 a
			(0.049)	(0.034)			(0.300)
only Moody's			0.084 b	$0.223 \ a$			-1.937 c
			(0.049)	(0.070)			(1.011)
only Fitch			0.093	$0.240 \ a$			-2.043 a
			(0.073)	(0.056)			(0.861)
S&P and Moody's				0.061 a			-0.828
				(0.016)			(0.534)
Moody's and Fitch				0.046 c			-0.692 a
				(0.029)			(0.151)
Fixed-Effects							
Vintage	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Security-type	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Estimation	probit	probit	probit	probit	OLS	OLS	OLS
Observations	28,238	$28,\!238$	$28,\!238$	28,238	4,904	4,904	4,904
Pseudo/Adjusted R^2	0.12	0.12	0.12	0.13	0.15	0.15	0.15

Table 14:
Rating Shopping and AAA Securities

Dependent	Pr(down)	Pr(down)	Pr(down)	Pr(down)
Variable=				
Number of raters			-0.016 a	-0.048 a
			(0.004)	(0.007)
One rater	0.138 b	0.077		
	(0.061)	(0.068)		
Two rater	0.014 a			
	(0.003)			
Three raters		-0.014 a		
		(0.003)		
only S&P			0.050	-0.018
			(0.085)	(0.042)
only Moody's			0.007	-0.019 c
			(0.046)	(0.061)
only Fitch			0.005	0.007
			(0.004)	(0.008)
S&P and Moody's				-0.049 a
				(0.006)
Moody's and Fitch				-0.018 a
				(0.0003)
Fixed-Effects				
Vintage	Yes	Yes	Yes	Yes
Security-type	Yes	Yes	Yes	Yes
Estimation	probit	probit	probit	probit
Observations	4,654	4,654	4,654	4,654
Pseudo R^2	0.21	0.21	0.21	0.23

The estimation result is consistent with the hypothesis that the rating is simply an imperfect measure so that more evaluation leads to more accurate assessment of the true state and that perhaps S&P uses a slightly more inaccurate assessment and that there is a rating shopping.

To see if rating agencies became lax, it is useful to examine a variant of Table 15. In addition, it is useful to compare outcome of securities rated as a given level by itself alone and with some other rating companies.

Provided that there is no systematic difference in the ratings across agencies, to see if there is a rating shopping, one need to examine if the performance of a tranche with only one rating company is systematically worse than those with multiple ratings holding the rating constant. This corresponds to Table 14 so there is a slight evidence of rating shopping.

6.2 The Failure of the Black Box

Table 15 reports differences in opinion. Only anecdotal evidences about the failure of the black box is offered.

Table 15: Credit Rating Dispersion

	Mean	25th Percentile	Median	75th Percentile	Standard Deviation	Min	Max	# of tranches where diff=0	# of tranches
S&P - Fitch	-0.02	0.0	0.0	0.0	0.601	-5.0	5.0	7,671	9,507
S&P - Moody's	-0.26	0.0	0.0	0.0	0.881	-10.0	7.0	16,806	23,839
Moody's - Fitch	0.31	0.0	0.0	1.0	0.665	-4.0	10.0	6,478	9,150

Table 16: Ratings Correlation

	S&P	Moody's	Fitch
S&P	1.0		
Moody's	0.983 (0.000)	1.0	
Fitch	0.962 (0.000)	0.979 (0.000)	1.0

7 Summary

- 1. First, from 1992 to 2001, downgrades and upgrades were relatively infrequent (1-2% of outstanding tranches) and roughly balanced. 2002 and 2003 saw a spike in downgrades which was only slightly less severe than the current crisis nearly 5% of tranches were downgraded 3 notches on average but the overall market was much smaller at that time. The number of outstanding structured finance securities in 2002 was roughly one third of the number outstanding in 2007 and only one tenth the size of the market in 2008. Nearly 30% of downgrades in 2002 and 2003 affected tranches of high-yield collateralized bond obligations (CBOs), indicating that rating models did not anticipate how badly these assets would perform in a recession.
- 2. Second, the current crisis is notable for the size and severity of downgrades. We show that in 2007 and 2008, approximately 62% of downgrades can be attributed to securities backed by home equity loans or first mortgages. Examining securities that suffered the most severe downgrades (8 notches or more), we find that the majority of these tranches come from deals backed by home equity loans, first mortgages, and CDOs of ABS. It is these asset classes for which the rating model experienced the most dramatic failures. By now, it is well established that rating models failed to properly account for correlation of home prices at the national level. ABS CDOs would also be affected by this, since they often contain RMBS as collateral. But ABS CDOs are also more sensitive to errors in correlation assumptions, since they are higher level securitizations (securitizations that contain securitized assets in their collateral pools). Structured finance securities that fell 8 or more notches were most likely to be rated AAA.
- 3. Third, we compare the performance of structured finance ratings to the performance of cor-

porate bonds from 1983 to 2008. While corporate bonds are also sensitive to macroeconomic events, the magnitude of downgrades is relatively low and stable over time. Even during the 2001/2002 recession when 30% of corporate bonds were downgraded, the average downgrade was only 1.8 notches. Downgrades of structured finance securities in the 2007/2008 crisis were much more severe, averaging around 5-6 notches. Using micro-level data on ABS CDOs — one of the structured asset classes that performed relatively poorly in the recent crisis — we provide suggestive evidence that ratings shopping may have played a role in the current crisis. Among 534 ABS CDOs issued between 2005 and 2007, we find that tranches rated solely by one agency, and by S&P in particular, were more likely to be downgraded by January 2008. Further, tranches rated solely by one agency are more likely to suffer more severe downgrades. Nevertheless, it is not clear that rating shopping led to the ratings collapse as the majority of the tranches in our sample are rated by 2 or 3 agencies.