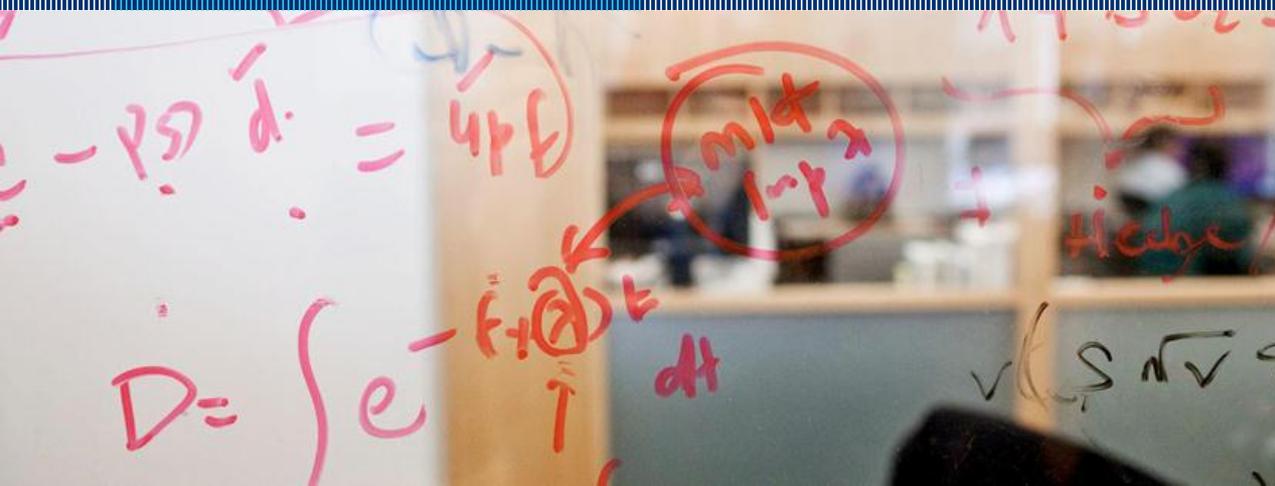
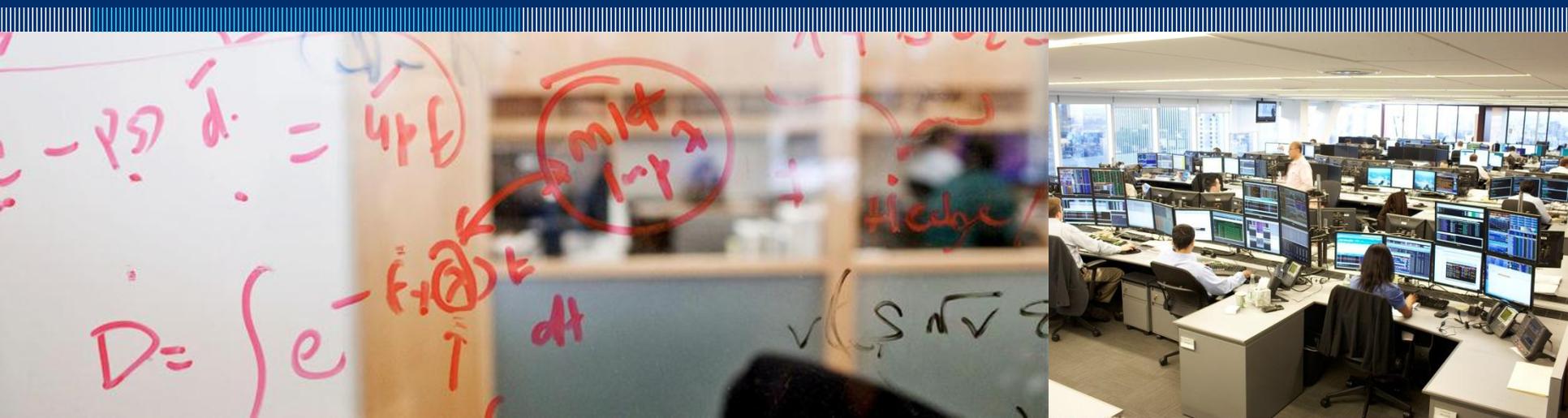


Swap Package Transactions

CFTC Technology Advisory Committee

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Swap Package Transactions

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Definition

- **Package transactions** involve the simultaneous pricing and execution of two or more component instruments
- **Combination of “buys” and “sells”** (or “payers” and “receivers”)
- Reasonable and quantifiable degree of **correlation** between the components
- **Risk** of the offsetting components is approximately **equivalent**

Examples

- **Swap Curve:** Package of two swaps of differing tenors
- **Swap Butterfly:** Package of three swaps of differing tenors
- **Unwind / Offset packages:** Portfolio of swaps of differing tenors
- **Swap Spreads:** Government bonds vs. swaps typically within similar tenors
- **MBS Basis:** TBAs (Agency MBS) vs. swap spreads
- **Invoice Spreads:** Treasury-note or Treasury-bond futures vs. swaps
- **Cash / Futures Basis:** Eurodollar futures bundles vs. swaps
- **Delta-Neutral Option Packages:** Caps, floors, or swaptions vs. swaps

Economic Benefits

- **Tighter bid-offer spread**

Package has lower market risk than each outright, directional leg

- **Single vs. multiple bid-offer spreads**

Separate execution requires paying the bid-offer on each leg

- **More efficient risk transfer and hedging**

Only net risk is exchanged, rather than outright risk on each leg

- **Elimination of “legging risk”**

Risk that the market moves between the execution of each leg

Representative Analysis of Transaction Costs

Swap Spread (Swap vs. Treasury)

Execution as Two Separate Legs

- Pay 4.15 bps vs. mid of 3.75 bps
- Effective price = 0.4 bps
- X \$90,000 (DVO1 per \$100mm notional on a 10Y swap spread)
- **Transaction Cost = ~\$36,000**

Execution as a Package

- Pay 3.875 bps vs. mid of 3.75bps
- Effective price = 0.125 bps
- X \$90,000 (DVO1 per \$100mm notional on a 10Y swap spread)
- **Transaction Cost = ~\$11,250**

Market pricing (as observed the morning of November 20, 2013)

Product	Bid	Ask	Implied Mid
10Y Treasury	2.7045 %	2.7085 %	2.7065 %
10Y Swap	2.742 %	2.746 %	2.744 %
10Y Swap Spread	3.625 bps	3.875 bps	3.75bps

Representative Analysis of Transaction Costs

Swap Curve (Swap vs. Swap)

Execution as Two Separate Legs

- Pay 132 bps vs. mid of 131.55 bps
- Effective price = 0.45 bps
- X \$50,000 (DVo1 per \$100mm notional on a 5Y swap curve)
- **Transaction Cost = ~\$22,500**

Execution as a Package

- Pay 131.7 bps vs. mid of 131.55 bps
- Effective price = 0.15 bps
- X \$50,000 (DVo1 per \$100mm notional on a 5Y swap curve)
- **Transaction Cost = ~\$7,500**

Market pricing (as observed the morning of November 20, 2013)

Product	Bid	Ask	Implied Mid
5Y Swap	1.426 %	1.430 %	1.428 %
10Y Swap	2.742 %	2.746 %	2.744 %
5/10 Swap Curve	131.4 bps	131.7 bps	131.55 bps

Select Items to Address

- **Multi-swap package transactions**

Communication protocol and credit limit checking of net risk

- **Swap spreads**

Guaranteeing settlement of the US Treasury leg

- **Invoice spreads**

Separate regulatory regime for swaps and futures

- **“EFRP” model for swaps**

Transferability of the futures market’s solution for package transactions

Recommendations

- **Do No Harm** – As a threshold matter, avoid breaking up the simultaneous pricing and execution of package transactions

- **Identify Issues & Solutions** – For example:

For Multi-Swap Package Transactions...

Collaborative industry enhancements to the execution-to-clearing workflow that support these package transactions

For Swap vs. Non-Swap Package Transactions...

Development of execution paradigms / protocols that are viable for these package transactions (including an “EFRP” style process for swaps)

- **Provide Time to Implement Solutions for Package Transactions**