



Concerns about proposal

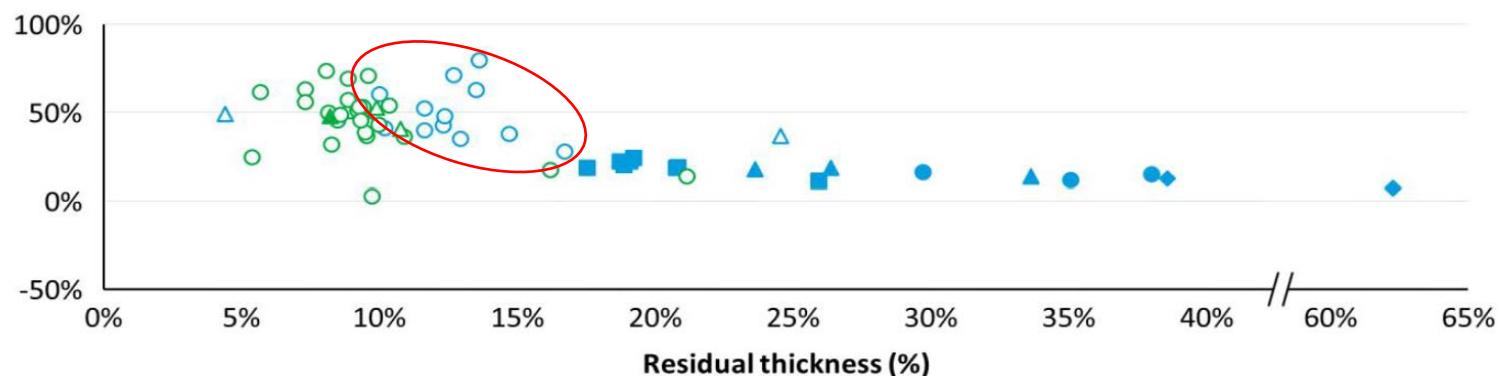
1. Proposal essentially only assigns 45% to BSL CLOs
2. Risk to MM CLOs is similar to that of BSL (chart)
3. Counter-intuitive to benefit classes which have illiquidity risk due to lack of transparency as to the underlying
4. CRE CLOs and CMBS are currently underperforming due to stress in commercial real estate.
5. Enforcement of classification - who classifies the transactions?



MM CLO Losses vs actual holdings

Figure 19: Losses by CLO residual thickness – Mid-tail (GFC) scenario, %

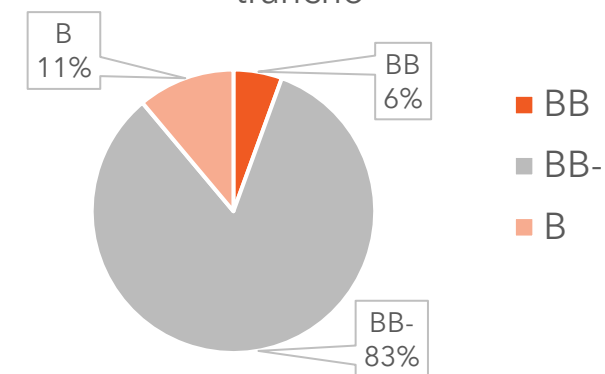
Decrease in NPV (%)



CLO type BSL MM

Rating of next-most junior tranche¹ AAA AA A BBB BB B

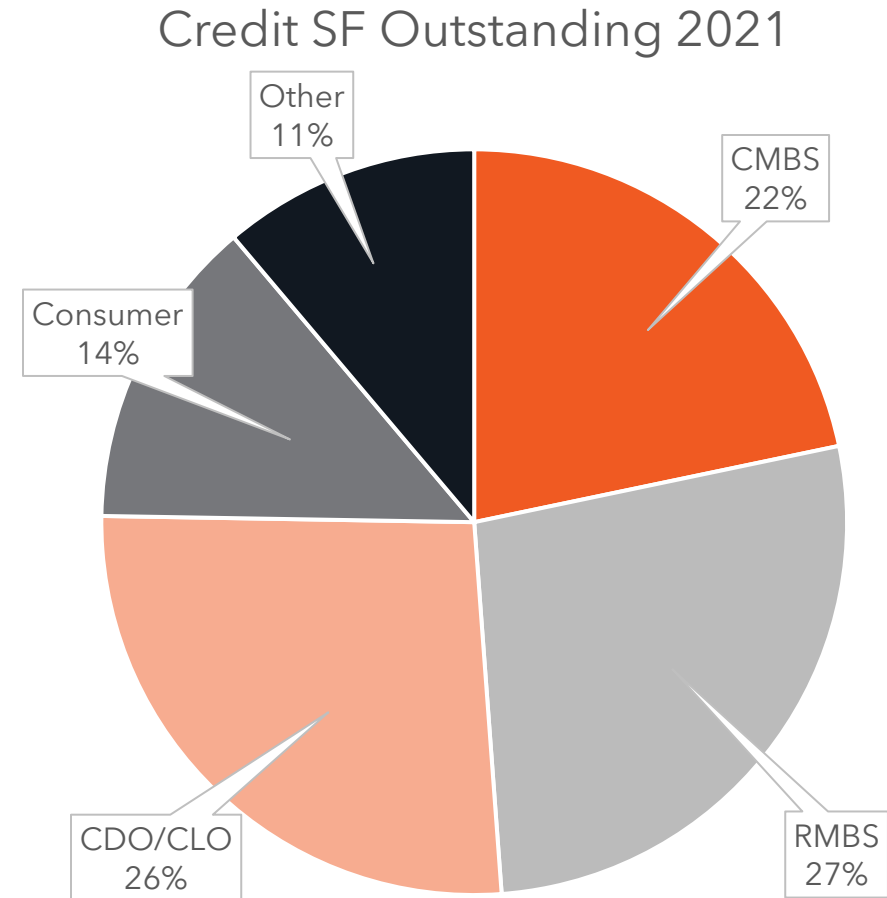
MM CLO Equity -- next most junior tranche





SF Credit Sensitive Securities

- The assets securitized fall into several categories:
 1. Mortgages: Residential and Commercial (excluding GSE guaranteed)
 2. Consumer: Auto (loans and leases), Credit Card, Student Loan
 3. Credit: CLOs (backed by high yield loans), CDOs, Synthetic CDOs, CBOs
 4. Other / Esoteric: CFO, Royalties (music and pharma), Equipment (e.g. rail cars), Franchise (Dunkin Donuts) .



Source: SIFMA