

C1 RBC Representative Portfolio

American Academy of Actuaries Report to
NAIC Investment Risk-Based Capital Working Group

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Presentation Outline

- The Purpose of a Representative Portfolio
- The Construction of the Representative Portfolio
 - Source of data
- Initial Observations on Data
 - Differences by portfolio size
 - Differences by quality
 - Possible adjustments to the base C1 factor
- Open Issues & Next Steps



Purpose of a Representative Portfolio

- Major assumption in the development of the basic C1 factors; input to bond model
 - Generic portrayal of portfolio structure that captures key features which differentiate C1 risk
 - Impractical to model every company's portfolio
- Underlying data provides basis for adjustments to the basic C1 factors
 - Data is not cusip specific
 - Given a quality rating and instrument type, default and recovery are assumed to be constant, i.e., not issue or issuer specific



Portfolio Construction: Data

- NAIC provided information on every bond position for every life insurance company as of December 31, 2011; data provided did not identify company or asset cusips
- Data represented approximately 287,000 positions; 782 companies
- Data was adjusted
 - Excluded bonds guaranteed by the full faith and credit (FFC) of the US Government
 - Excluded zero value bonds
- Variables with large C1 impact are being analyzed
 - Portfolio size
 - Quality mix
 - Instrument type mix



Portfolio Size Category Ranges

The data is grouped into size categories for construction of model points that more closely correspond to the characteristics of portfolios

Size	\$Billion		\$Billion
1	0.0	-	0.5
2	0.5	-	1.0
3	1.0	-	2.5
4	2.5	-	5.0
5	5.0	-	10.0
6	10.0	-	25.0
7	25.0	-	80.0



Portfolio Construction: Model

- Sort each company's bond portfolio by issuer amounts and group by bins to identify size and quality distribution
- Bin sizes set as a percentage of total portfolio assets
- Result is the representative portfolio for each company
- Average of all portfolios is baseline representative portfolio for each respective size category

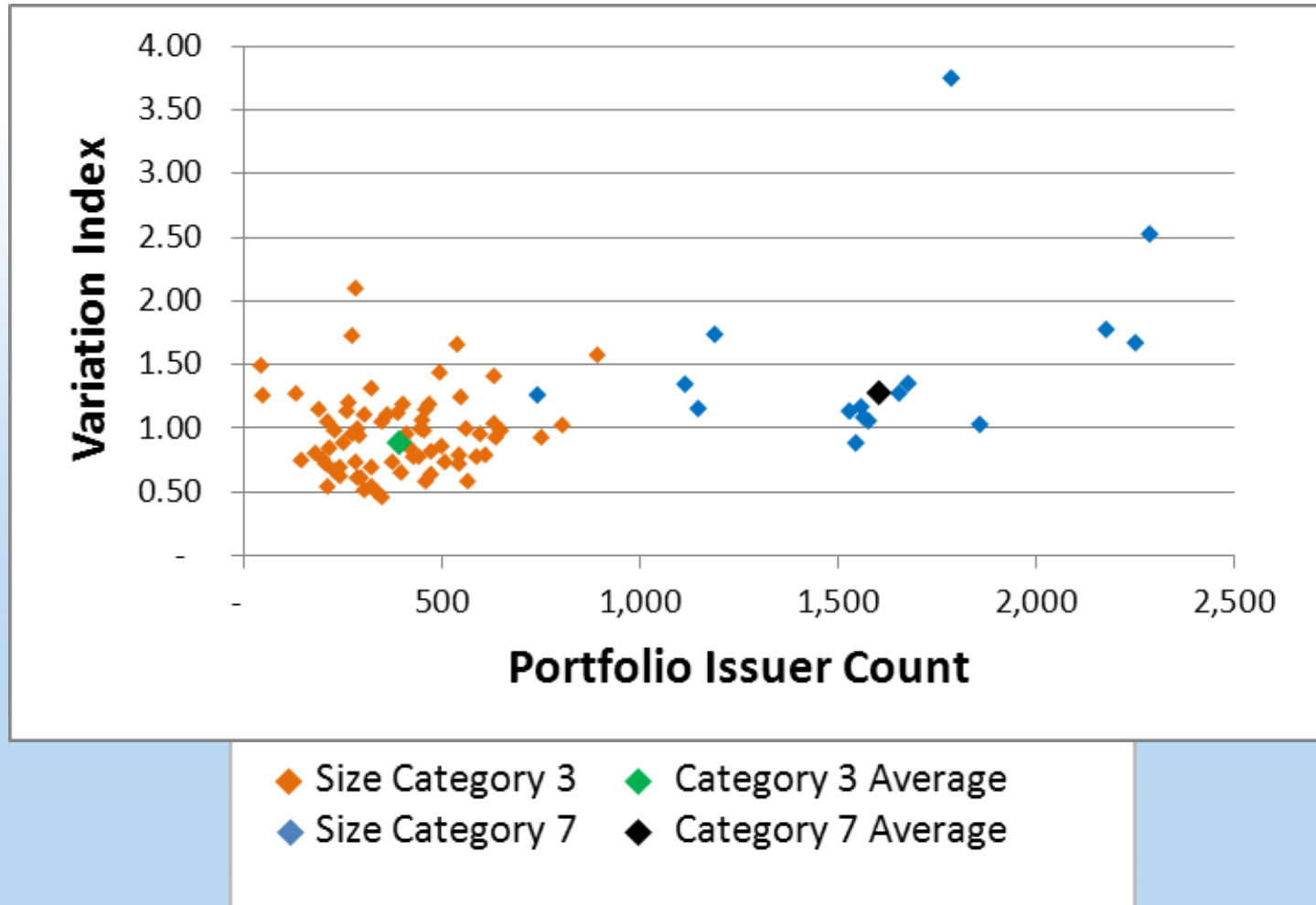


Observations on Portfolio Structure

- Issuer count and average issuer size is related to portfolio size
- Average portfolio issuer size distribution is related to portfolio size
- Most portfolio issuer size distributions across different size categories are in a similar range
- Portfolio issuer size distribution is evaluated with a variation index as a comparable measure across all portfolios



Observed Portfolio Variation



Portfolio Structure Effect on RBC

- Utilized the 1991 model in the table below to illustrate how a C1 charge would vary, if based on different portfolios
- Results show significant variation of C1 charge

Issuer Count	92nd Percentile RBC C1 Factors				
400	0.17%	0.35%	0.31%	0.45%	0.55%
800	0.09%	0.19%	0.16%	0.26%	0.31%
1200	0.04%	0.13%	0.11%	0.17%	0.21%
2400	0.01%	0.05%	0.03%	0.08%	0.11%
Variation Index	0.00	0.98	0.82	1.27	1.53



Possible Adjustments to Base C1 Factor

- RBC formula contains adjustments to base C1 factors to reflect key differences in risk characteristics of an insurer's asset portfolio
- Current approach
 - Number of issuers – aggregate C1 adjustment up/down relative to a portfolio with 1200 issuers
 - Issuer concentration – double the C1 of the ten biggest issuer positions
 - Current approach may not be the best way to reflect portfolio differences
 - Insurers can arbitrarily change the ten biggest positions to reduce C1
- Other alternatives
 - Issuer concentration
 - Adjust relative to variation index
 - Adjust for the x% biggest issuer positions
 - Combined measure – adjustments relative to issuers per unit of the variation index



Open Issues and Next Steps

- Expand analysis to all size groups
- Consider analysis of portfolios with more granular letter modifier rating groupings
- Expand representative portfolio information
- Analyze portfolio variations to define adjustments to base C1 factors

