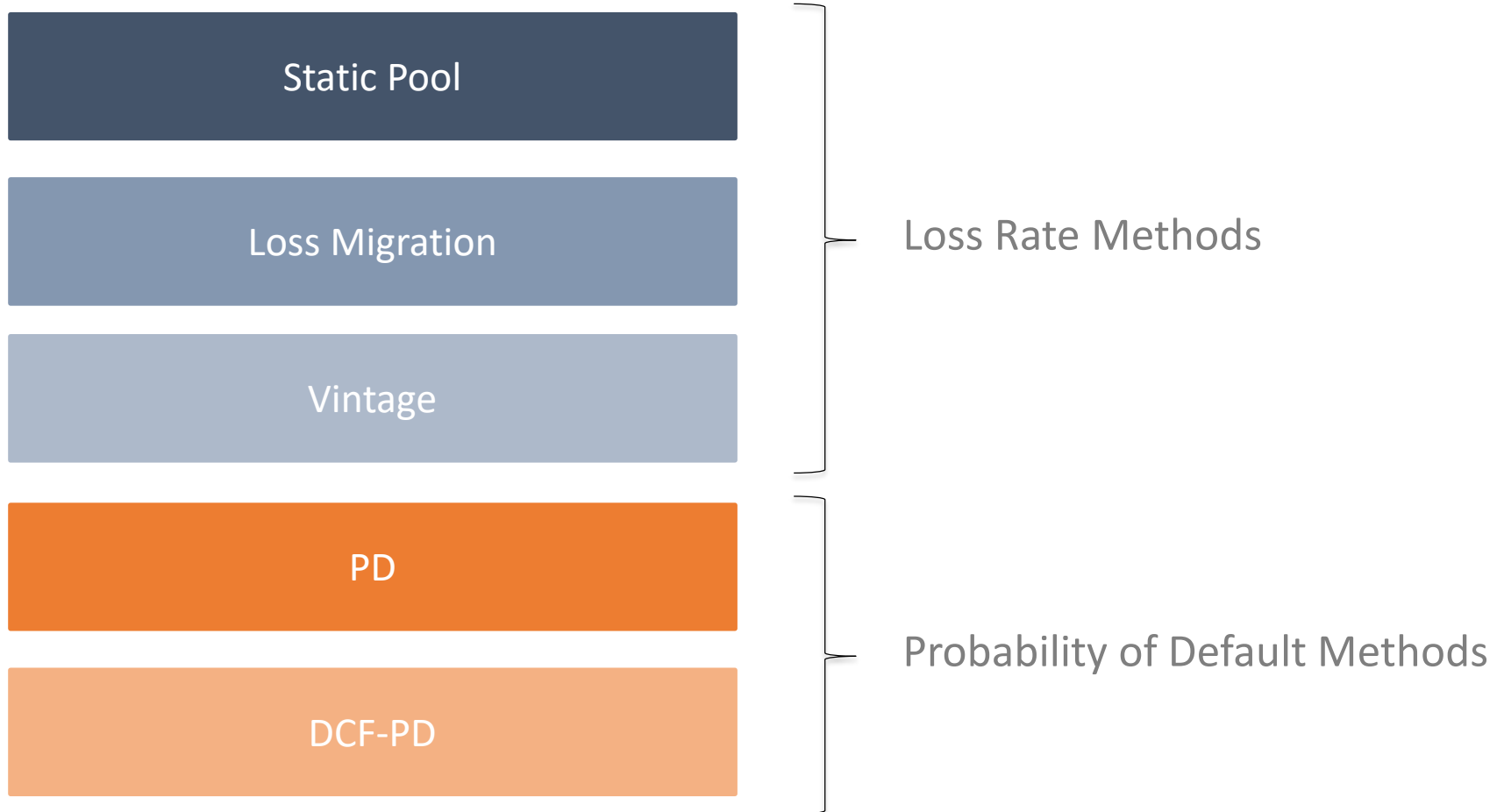


The Ultimate CECL Study

LAUNCH CONFERENCE – JANUARY 2019

- Brief methodology overview
- Intro to Ultimate CECL Study
- Auto study results
- Mortgage study results

Methodology Overview



New Auto – Direct (5 year term)

Period	Beginning Balance	Closed Balance	Charge-off Balance	Ending Balance
2013	130,000	56,000	1,000	73,000
2014	73,000	35,200	800	37,000
2015	37,000	20,600	400	16,000
2016	16,000	9,700	300	6,000
2017	6,000	5,940	60	0
2018	0	0	0	0
Total			2,560	

Loss Rate:

$$\frac{\$2,560}{\$130,000} = 1.97\%$$

2018 Q1 Active Balance: \$150,000

Expected Lifetime Loss = \$150,000 x 1.97% = \$2,955

Pros

1. Simple Calculations
2. Similar to current industry standard

Cons

1. Data availability
2. Only using small part of history
3. Loan age assumptions

Assumptions for Use

- Long historical data availability
- Consistent age distribution over time
- Historical pool is comparable to current portfolio

New Auto – Direct

Reporting Date: 03/31/2018

Vintage	Age	Balance (\$)	Loss Rate (%)	Unadjusted Exp. Loss (\$)
2018	1	100,000	?	?
2017	2	350,000	?	?
2016	3	200,000	?	?
2015	4	100,000	?	?
2014	5	40,000	?	?
2013	6	10,000	?	?
Total		800,000		

New Auto – Direct

Reporting Date: 03/31/2018

Vintage	Age	Balance (\$)	Loss Rate (%)	Unadjusted Exp. Loss (\$)
2018	1	100,000	1.15%	1,150
2017	2	350,000	1.12%	3,920
2016	3	200,000	1.13%	2,260
2015	4	100,000	1.02%	1,020
2014	5	40,000	1.02%	408
2013	6	10,000	1.05%	105
Total		800,000	1.11%	8,863

Pros

1. Uses entire data history
2. Stable estimates
3. Accounts for loan age

Cons

1. Involved calculations
2. Different from current approaches

Assumptions for Use

- Long historical data availability (or reasonable balance estimates)
- Historical data comparable to current portfolio

LOAN ID: 3974-209029
 Origination Date: 04/27/2018
 Reporting Date: 04/30/2018
 Balance: \$23,928.29

PD Framework

Month	Date	Estimated PD	Balance	Coll. Value	Cost To Sell (%)	Net Proceeds	LGD	Expected Loss (\$)	Disc. Exp. Loss (\$)
2	05/31/2018	0.008%	23,676	26,308	50%	13,154	10,590	0.87	0.86
3	06/30/2018	0.009%	23,423	26,088	50%	13,044	10,446	0.97	0.96
4	07/31/2018	0.010%	23,169	25,863	50%	12,931	10,304	1.07	1.06
...									
81	12/31/2024	0.0005%	1,235	13,419	50%	1,238	0	0.00	0.00
82	01/31/2025	0.0003%	916	13,303	50%	919	0	0.00	0.00
83	02/28/2025	0.0001%	597	13,200	50%	599	0	0.00	0.00
84	03/31/2025	0.00002%	277	13,086	50%	278	0	0.00	0.00
Total								55.91	52.72

Exp Loss (Not Discounted): \$55.91
 Exp Loss (Discounted): \$52.72

LOAN ID: 3974-209029
 Origination Date: 04/27/2018
 Reporting Date: 04/30/2018
 Balance: \$23,928.29

DCF Framework

Sum of totals, weighted
by probabilities

Month	Date	Estimated PD	Estimated PP	Balance	Monthly Payment	Total if Active	Total if Prepay	Total if Default	Exp. Cash (\$)	Disc. Exp. Cash (\$)
2	05/31/2018	0.008%	1.40%	23,676	321.95	321.95	23,745	13,154	646.87	643.13
3	06/30/2018	0.009%	1.41%	23,423	321.95	321.95	23,491	13,044	641.61	636.04
4	07/31/2018	0.010%	1.42%	23,169	321.95	321.95	23,236	12,931	635.98	628.63
...										
81	12/31/2024	0.0005%	1.4%	1,235	321.95	321.95	1,238	1,238	41.59	32.87
82	01/31/2025	0.0003%	1.6%	916	321.95	321.95	919	919	33.52	26.42
83	02/28/2025	0.0001%	1.8%	597	321.95	321.95	599	599	24.02	18.88
84	03/31/2025	0.00002%	4.2%	277	321.95	321.95	278	278	11.63	9.11
Total										23,876.57

Exp Loss (Discounted):
 $\$23,928.29 - \$23,876.57 = \$52.72$

Pros

1. Only need current data
2. Q&E and forecast adjustments seamlessly integrated

Cons

1. New / less familiar

Assumptions for Use

- Majority of active class has all required data fields
- Those who do not have required data in class are represented by those who do

Which methodology do you plan to adopt for CECL?

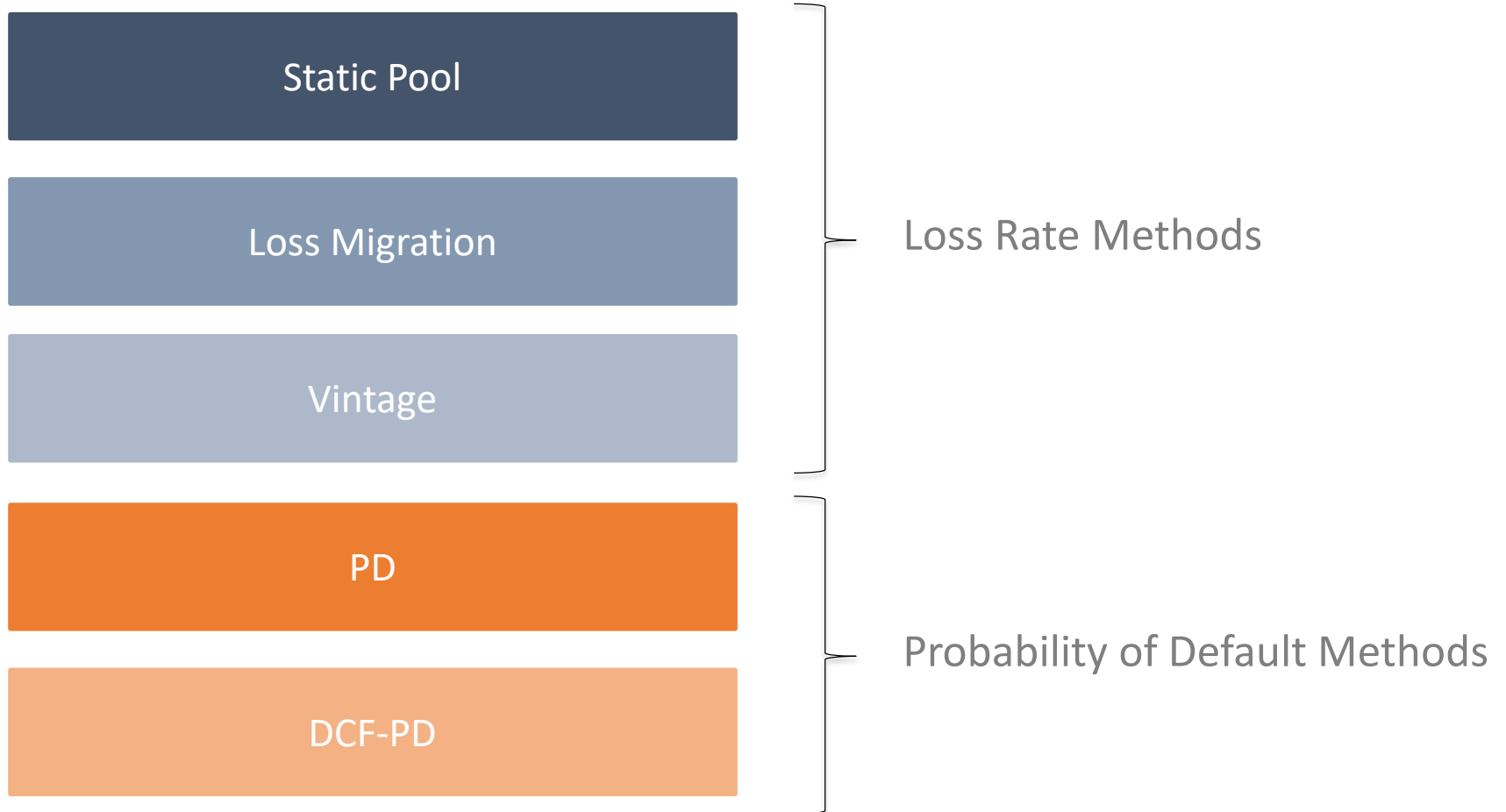
- A. Static Pool
- B. Loss Migration
- C. Vintage
- D. PD
- E. DCF
- F. Other

Ultimate CECL Study

Aid financial institutions in preparation by addressing two questions:

1. How much (if at all) will my allowance increase under CECL?
2. Will my CECL allowance change depending on which method I use? If so, which factors contribute to the differences?

- Assume current date is 12/31/2017
- 1-yr charge-off ratio calculated for each portfolio
- Each portfolio passed through 6 CECL-compliant calculations
- Comparison of outcomes



Static Pool
(3 year lookback)

Vintage
Raw

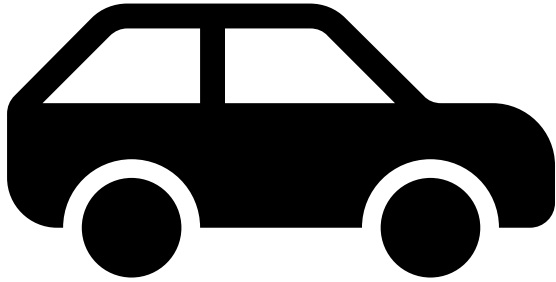
Vintage
CQI

Vintage
Econ. Adj.

PD

DCF-PD

- **Vintage Raw:** not segmented by CQI or adjusted for economic forecast
- **Vintage CQI:** segmented by CQI, not adjusted for economic forecast
- **Vintage Econ. Adj.:** adjusted for economic forecast but not segmented by CQI

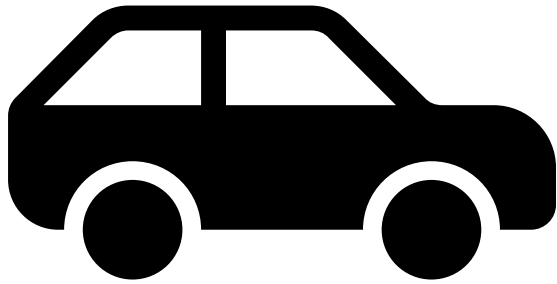


Auto Loan Study



1st Mortgage Study

(Coming soon: Credit Card, Business, etc.)



Auto Loan Study



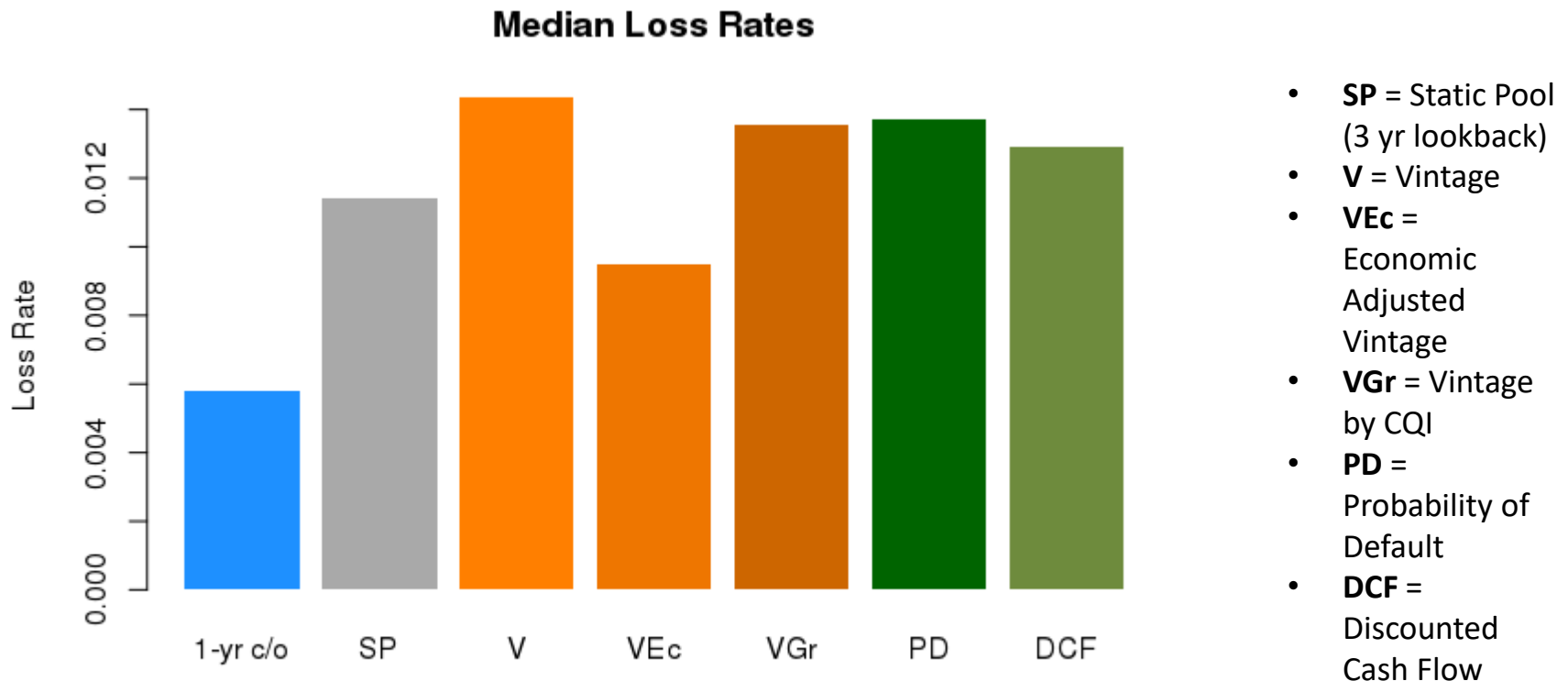
1st Mortgage Study

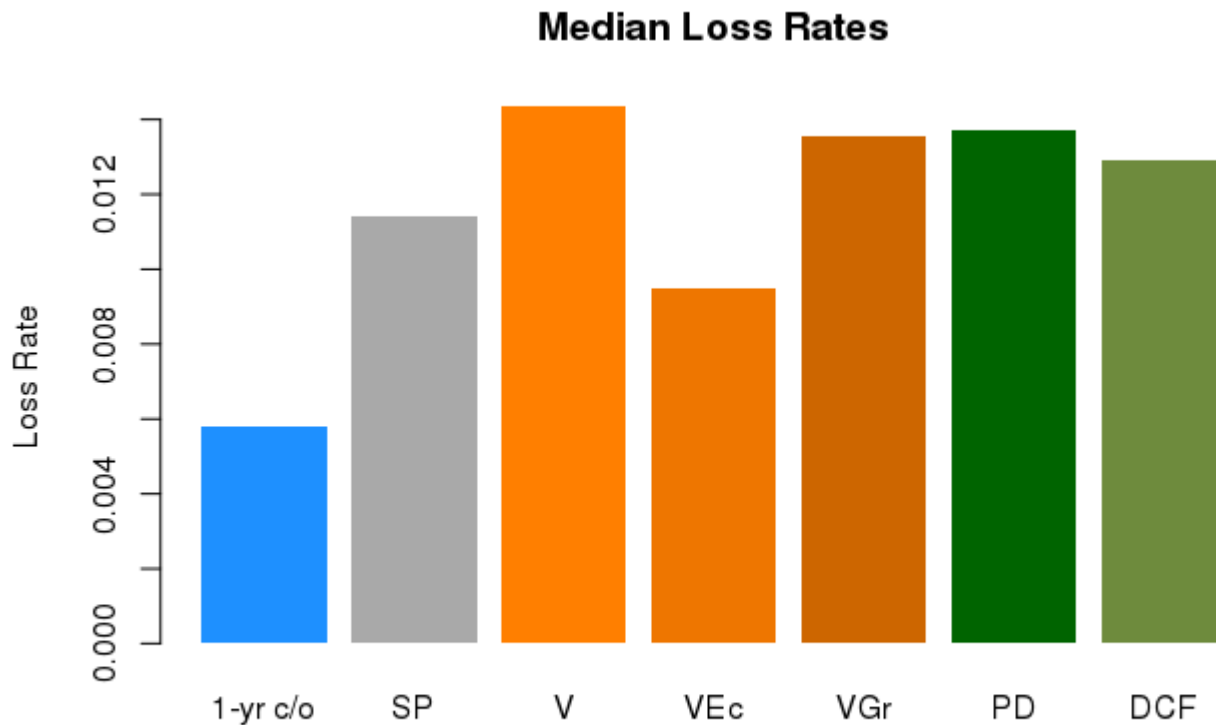
(Coming soon: Credit Card, Business, etc.)

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ition, this) 1))
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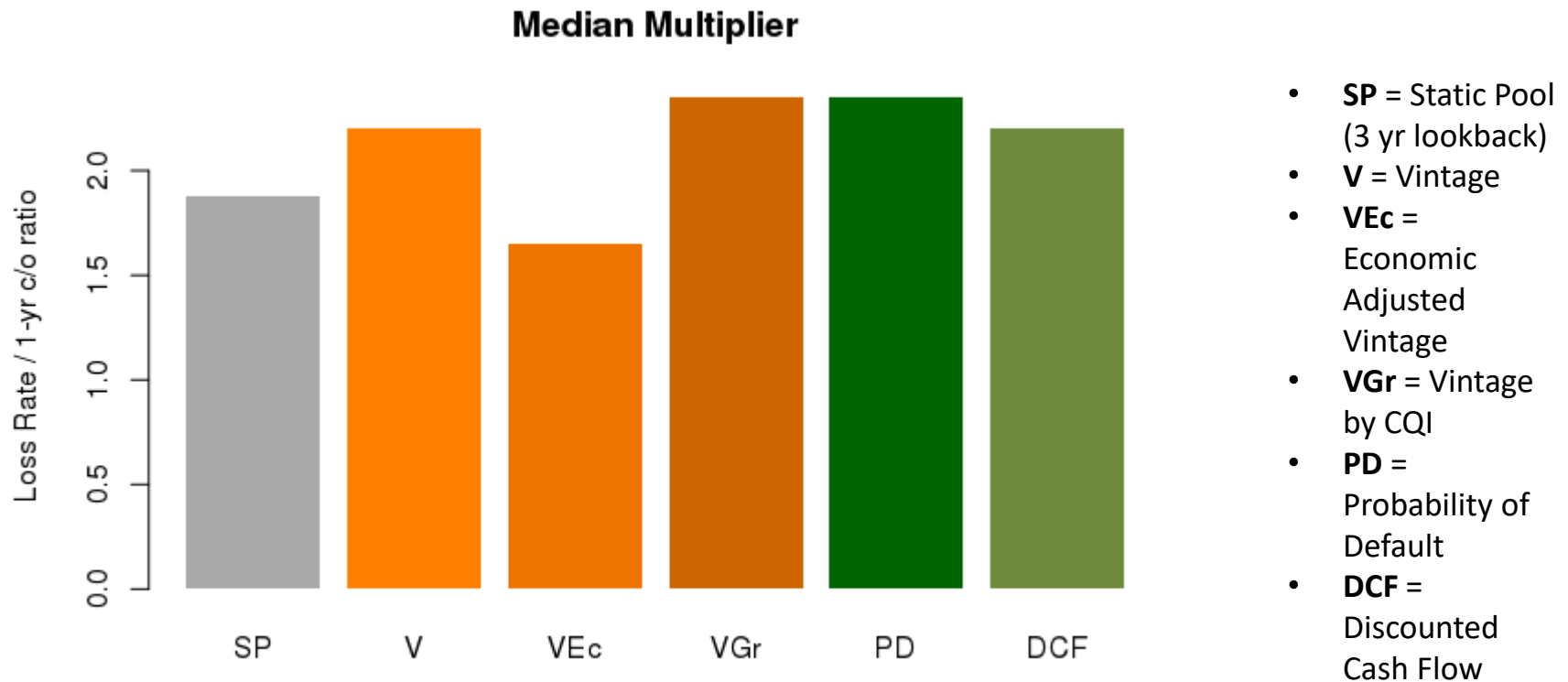
- Monthly, loan-level auto loan records uploaded by Visible Equity users
- 53 institutions selected based on data quality and completeness
- Balance data since 2010, charge-off data since early 2000s

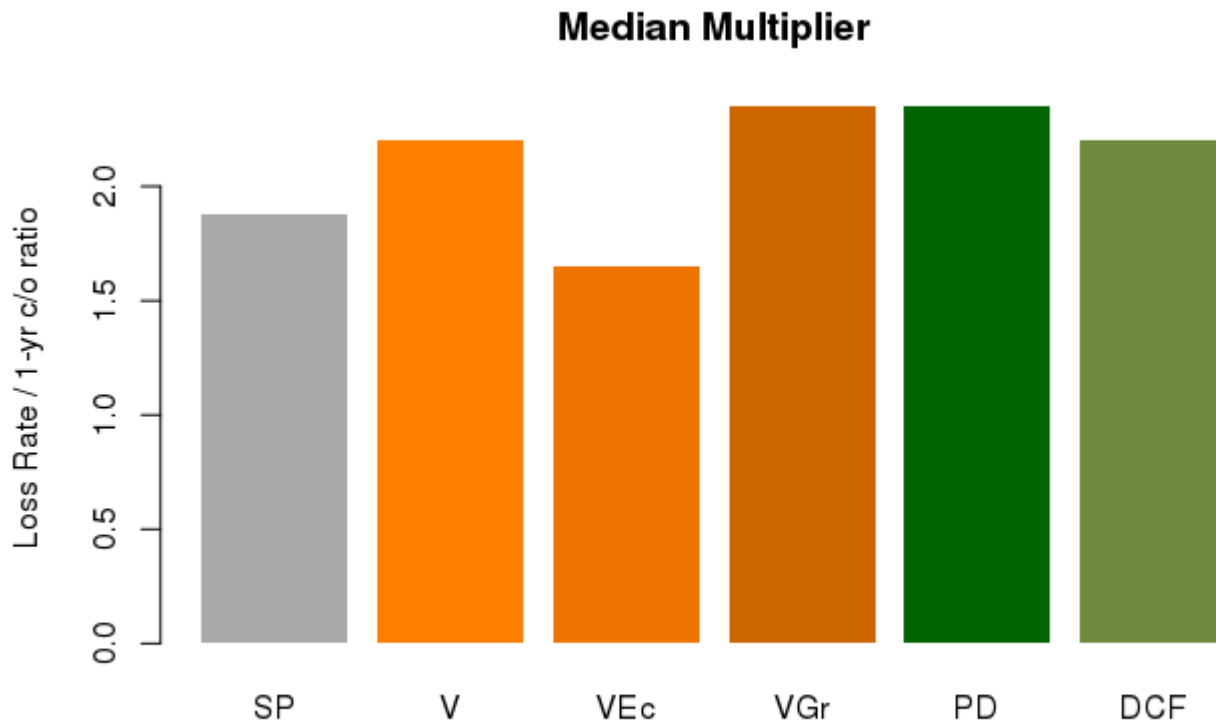
Aggregate Results





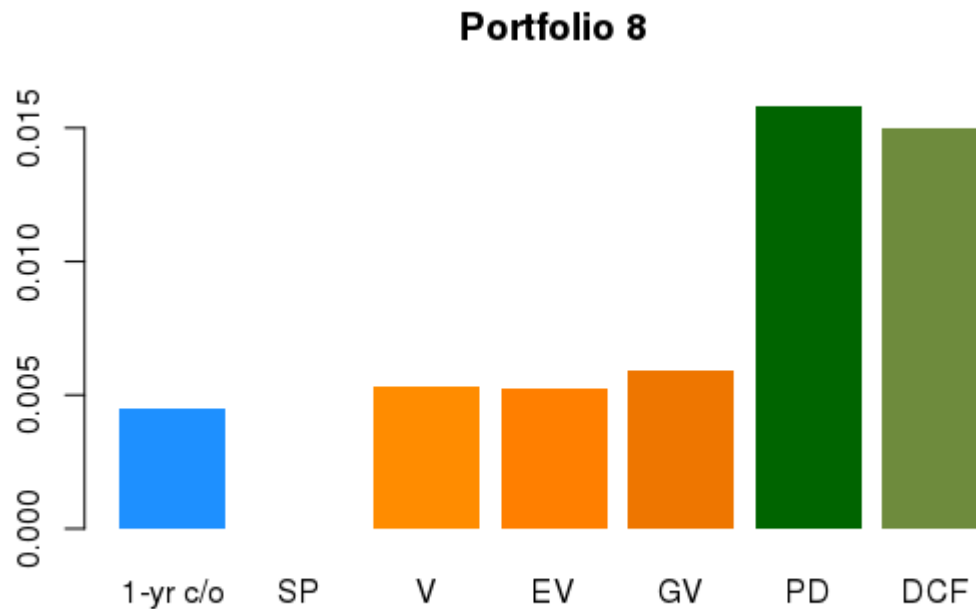
Takeaway: There is no clear systematic difference between CECL methods, except for Economic Adjusted Vintage.



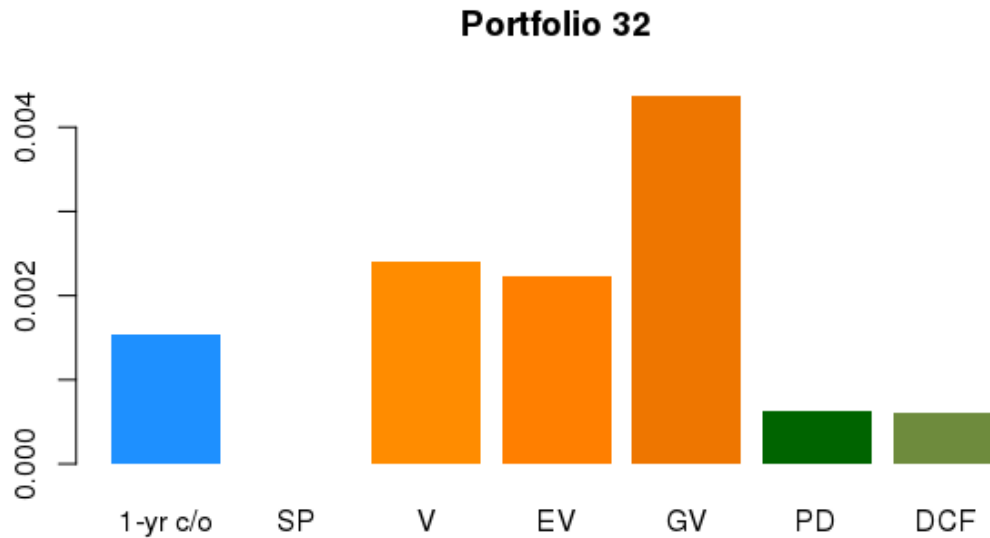


Takeaway: CECL base loss rates will *on average* be approximately double the *unadjusted* 1-yr c/o ratio. Q&E adjustments decrease the difference.

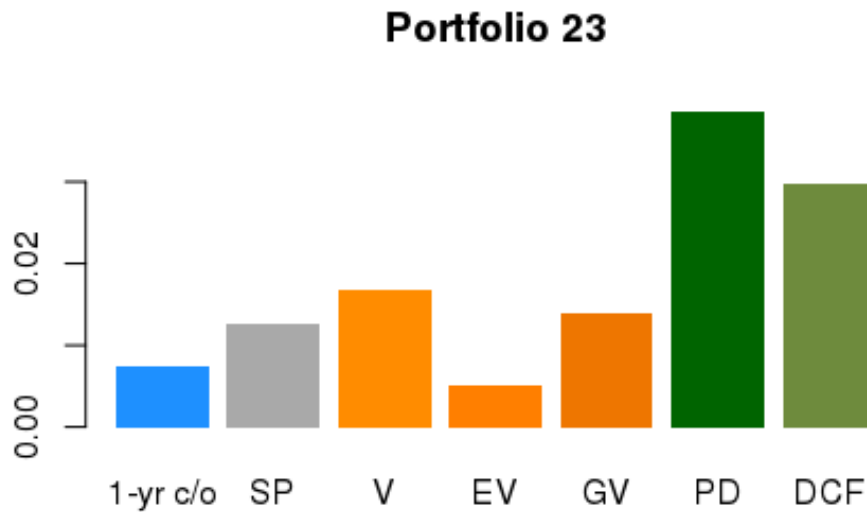
Individual Results



- Only 1 complete year of data history
- Ineligible for Static Pool
- Vintage less reliable

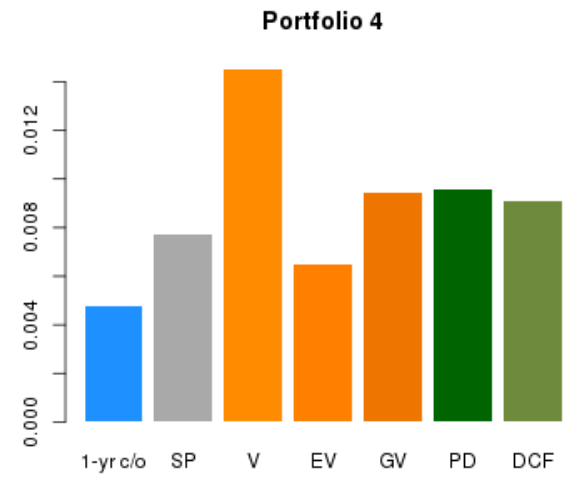
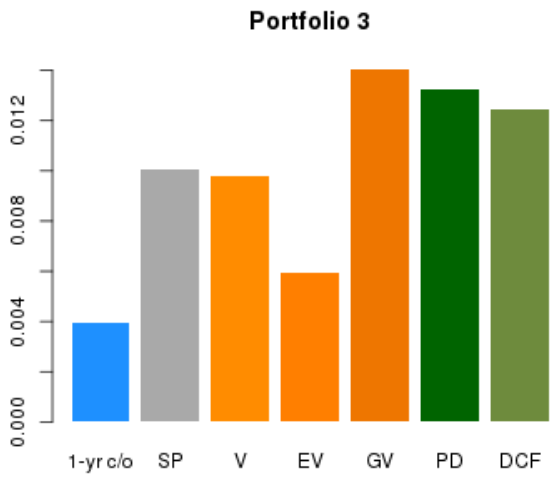
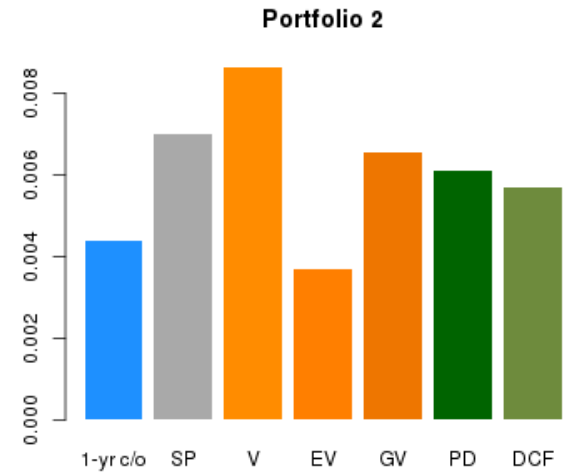
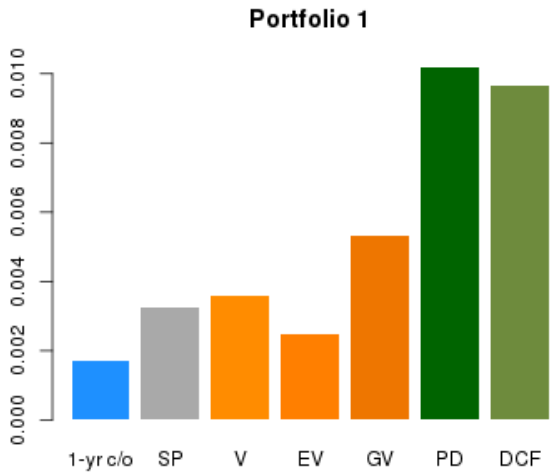


- Only 430 of 2900 active loans PD-eligible
- The 430 are relatively high quality
- Not representative of class

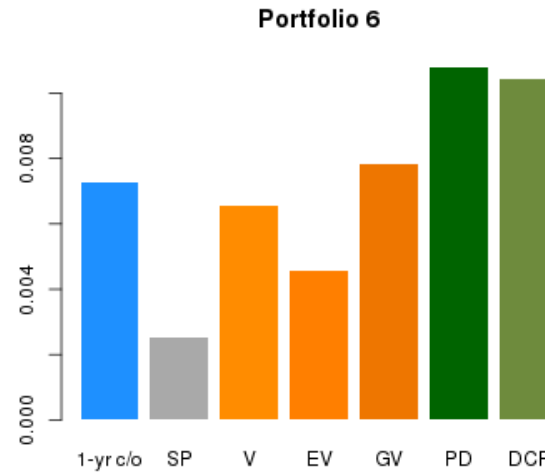
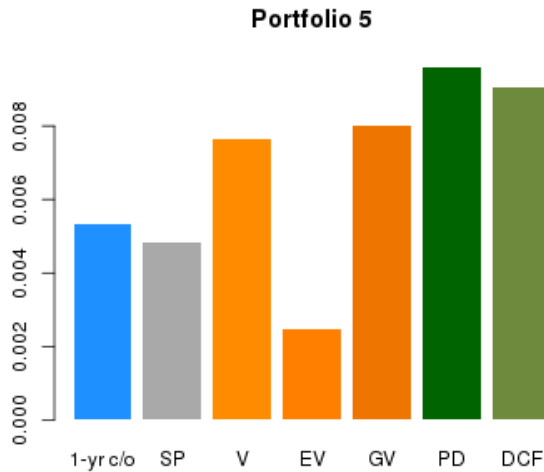


- Unusually high LTVs lead to high PD/DCF
- Not well reflected in the CQI used in GV

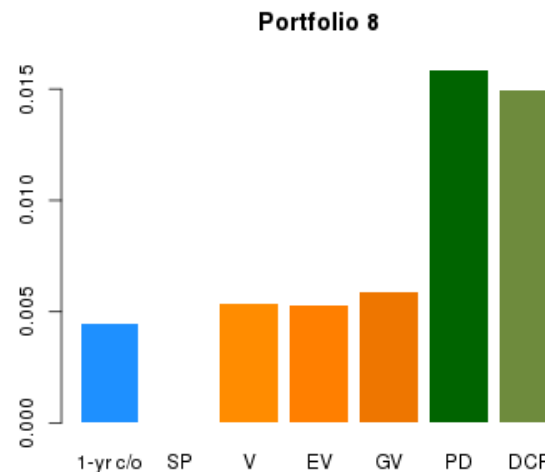
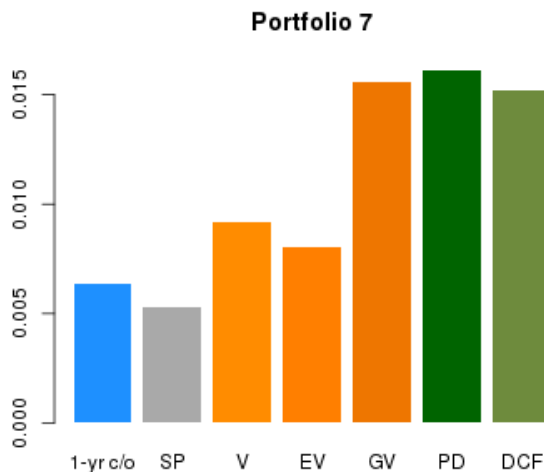
- Lower current grade quality
- Institution effect



- Regional economic conditions extremely favorable

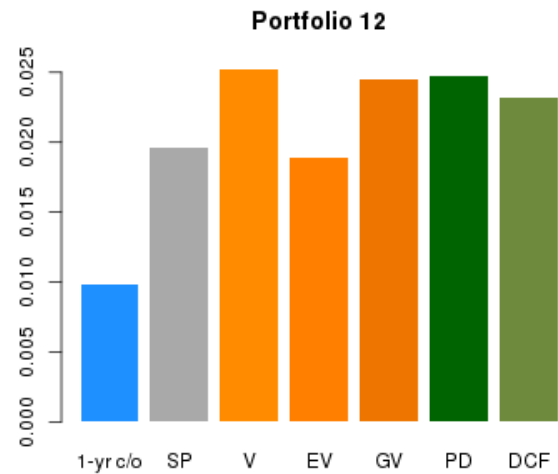
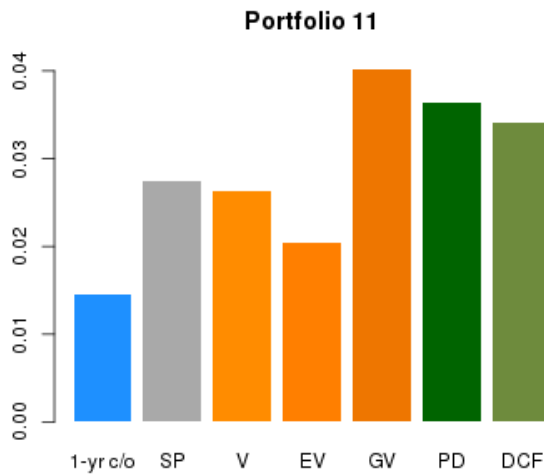
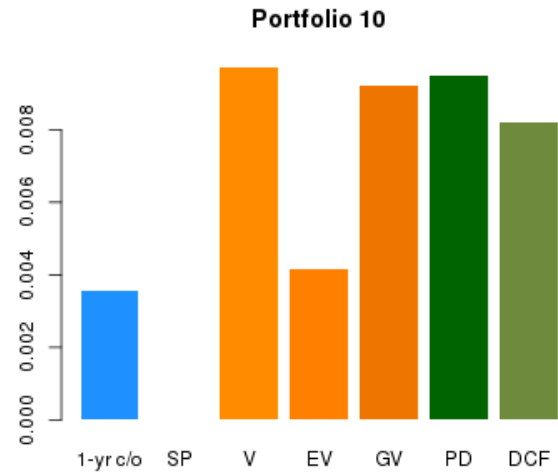
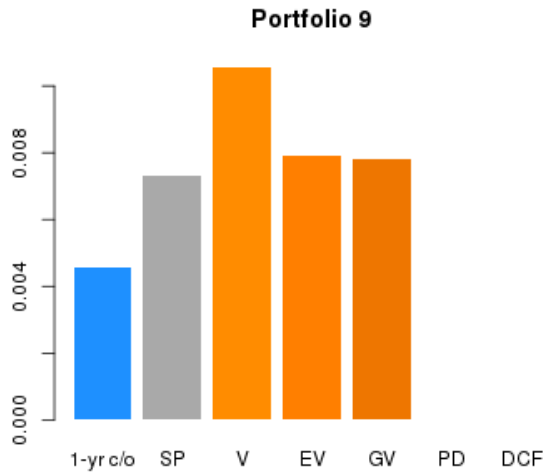


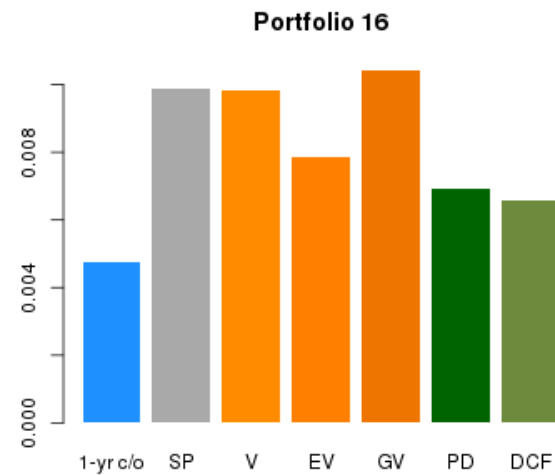
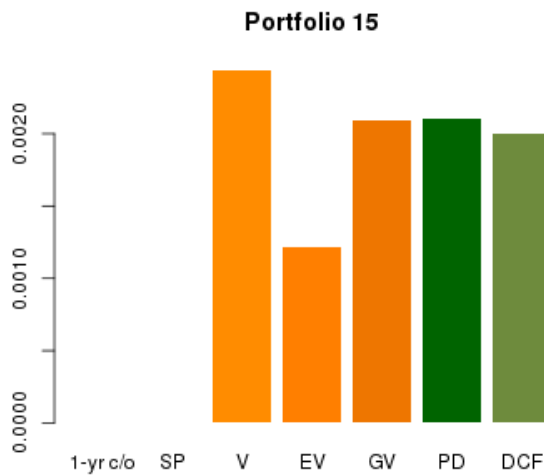
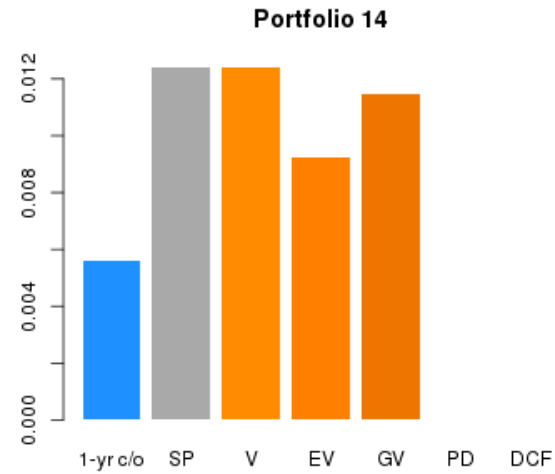
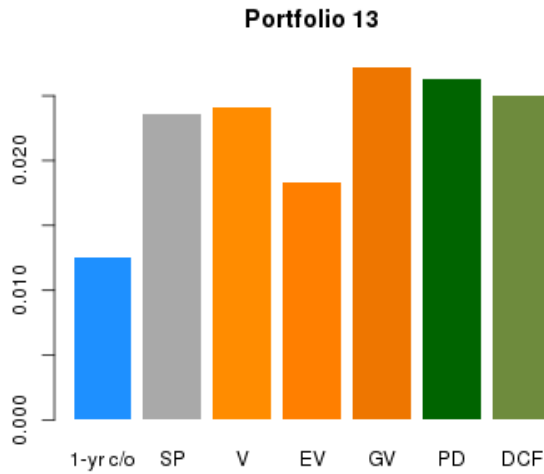
- Heavy c/o's in 2017
- Light c/o's in 2014-2016

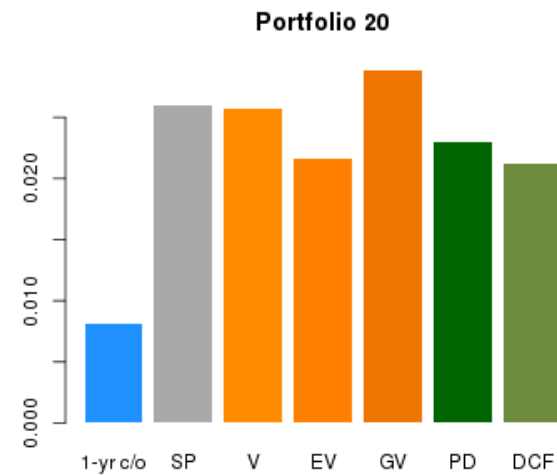
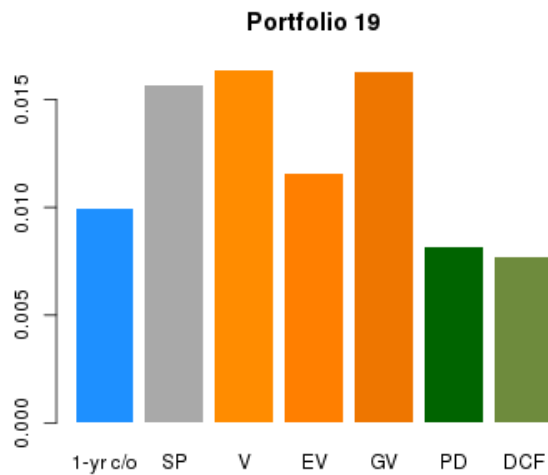
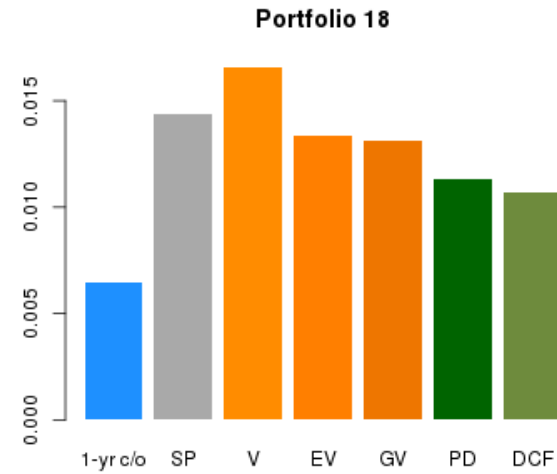
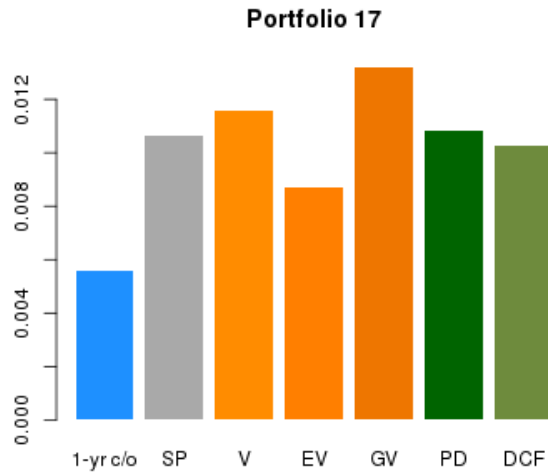


- Small sample size (only 1 year of complete data)

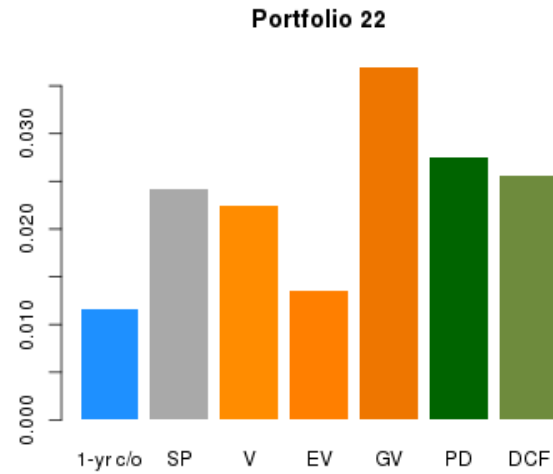
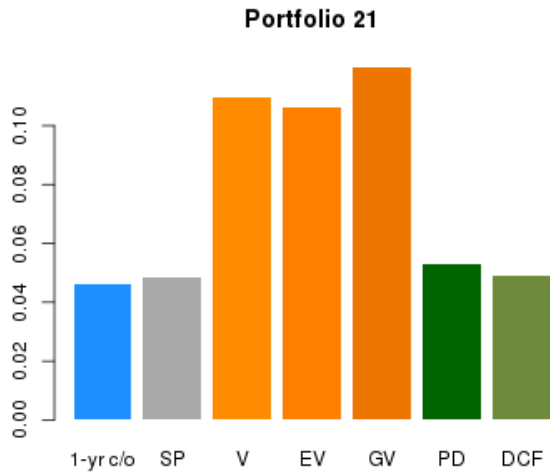
- Missing required PD data



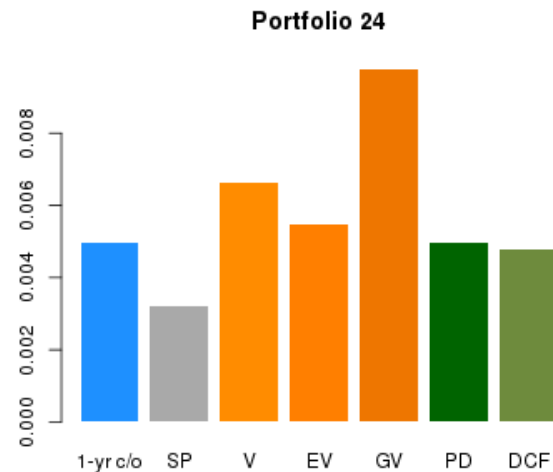
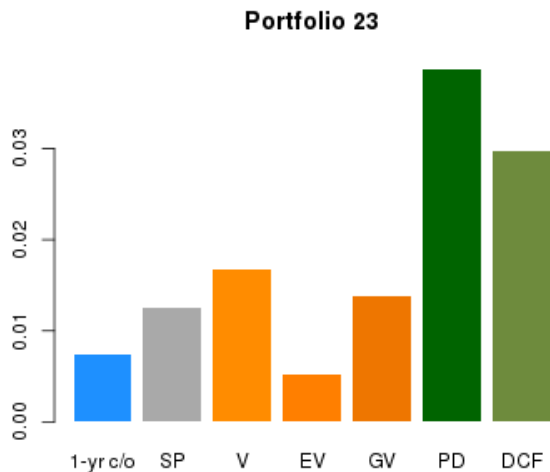


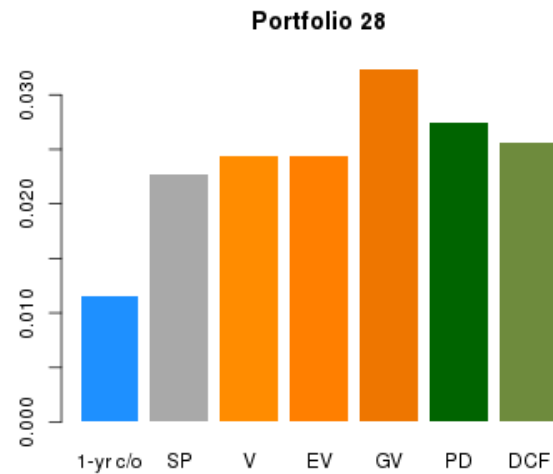
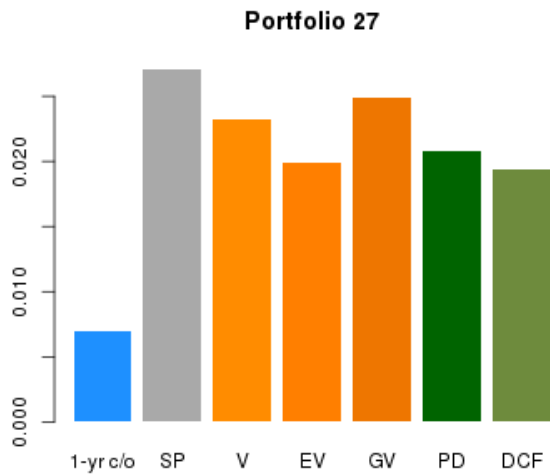
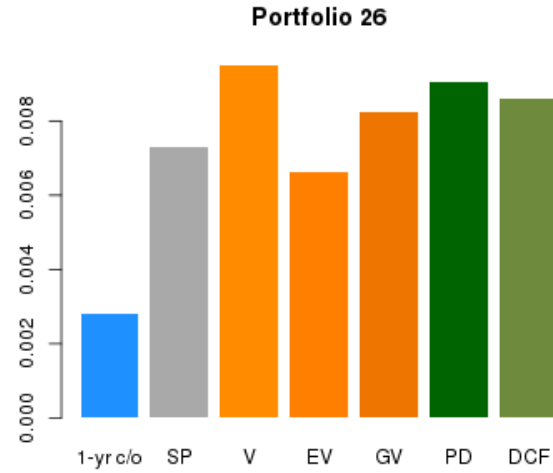
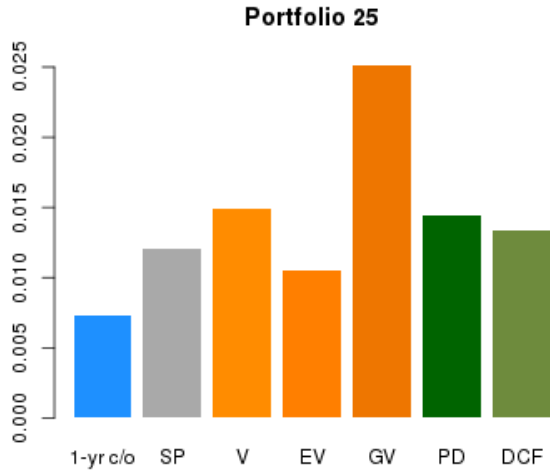


- Heavy losses in years 4-6 (unusual)

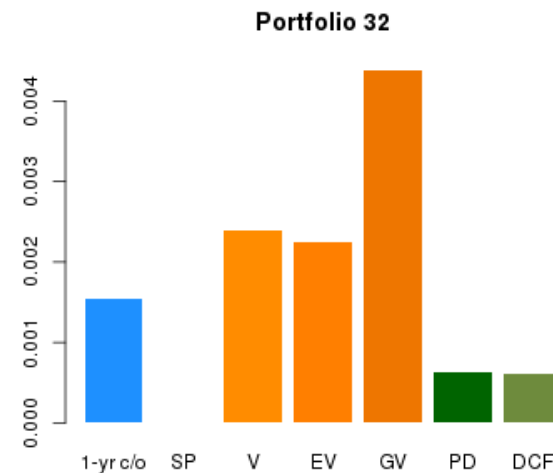
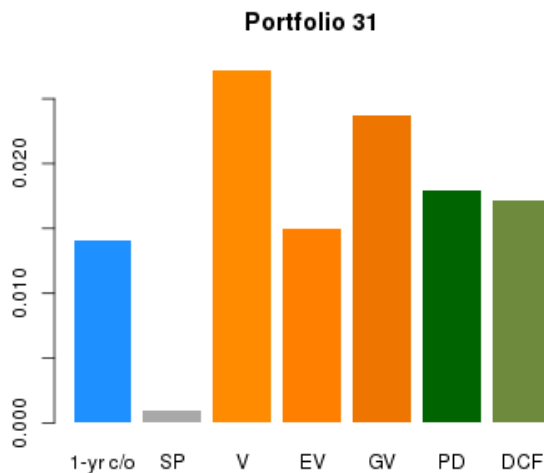
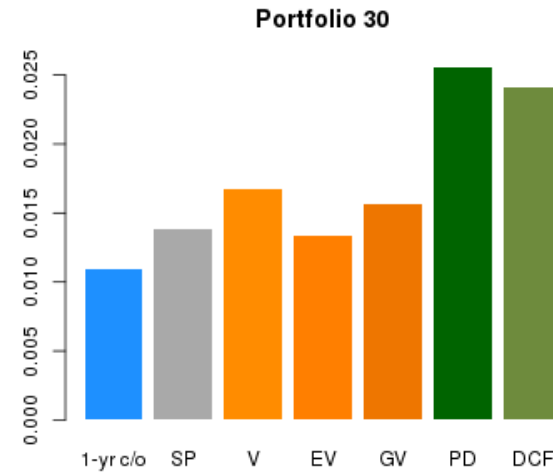
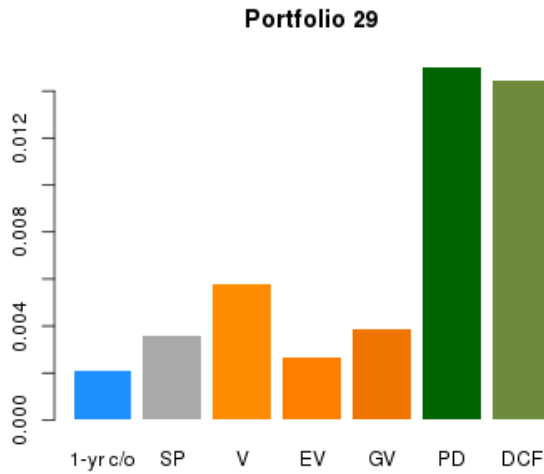


- Unusually high LTVs (not fully reflected in overall grade)

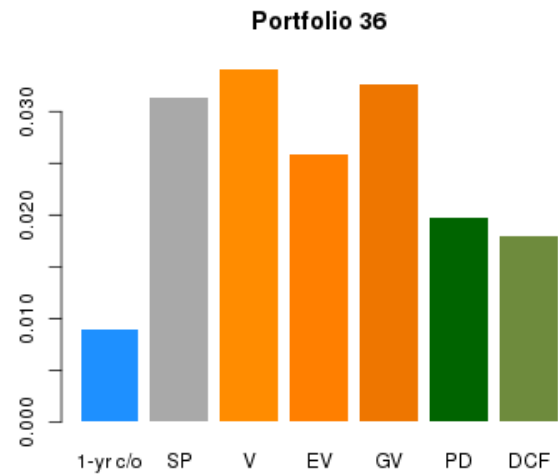
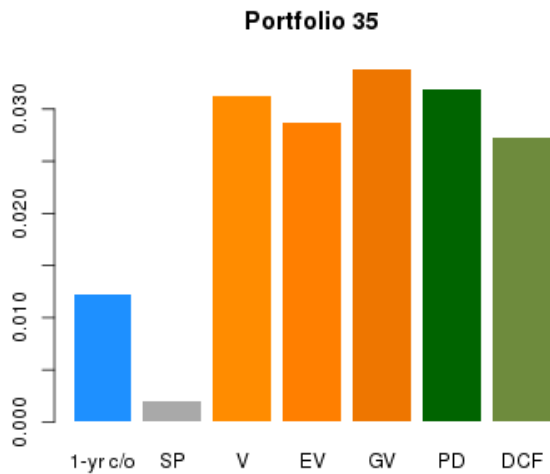
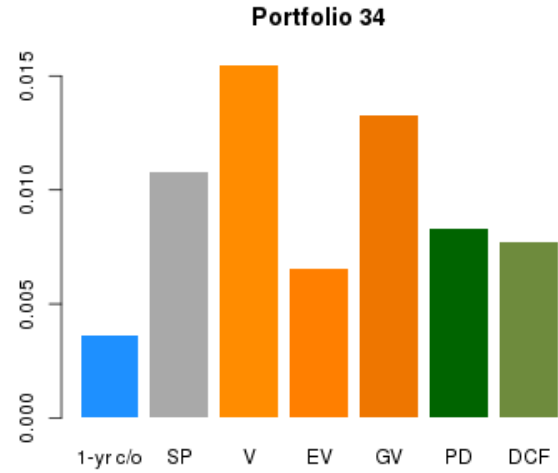
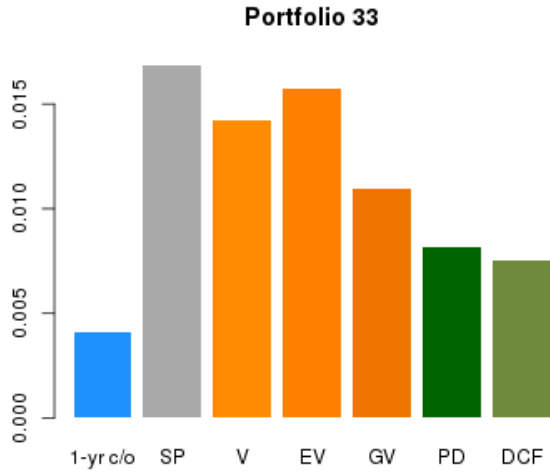


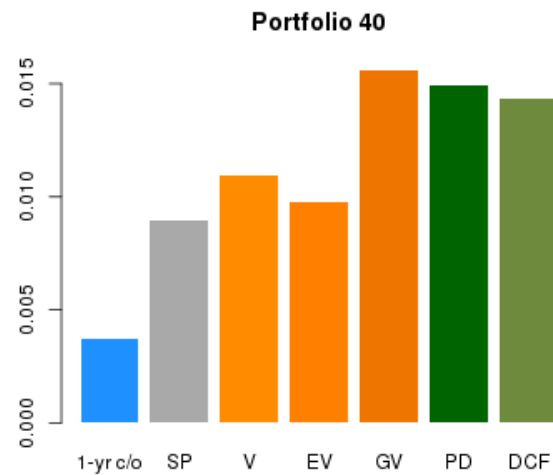
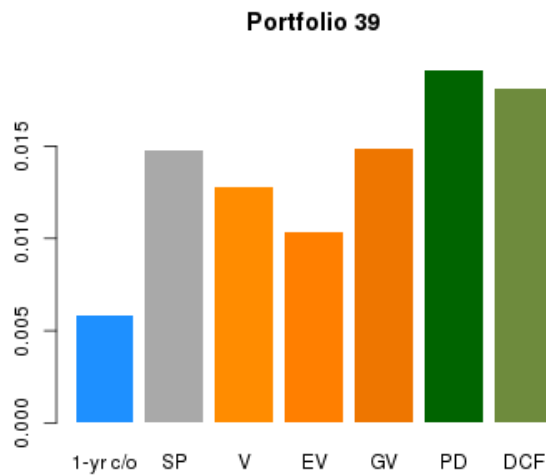
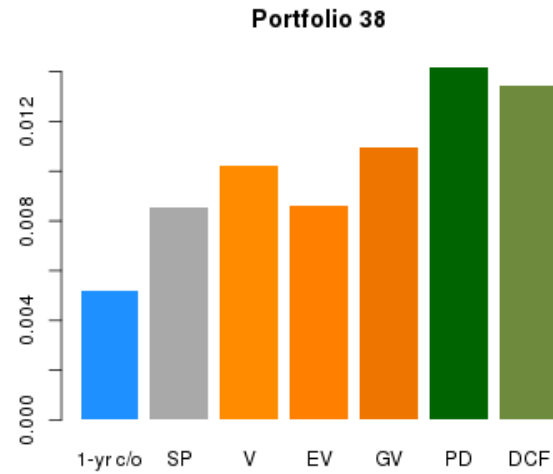
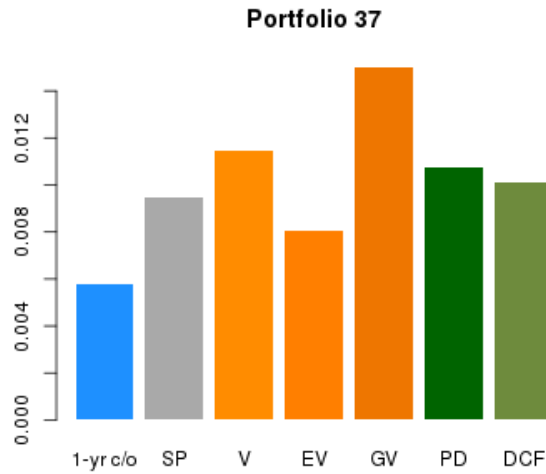


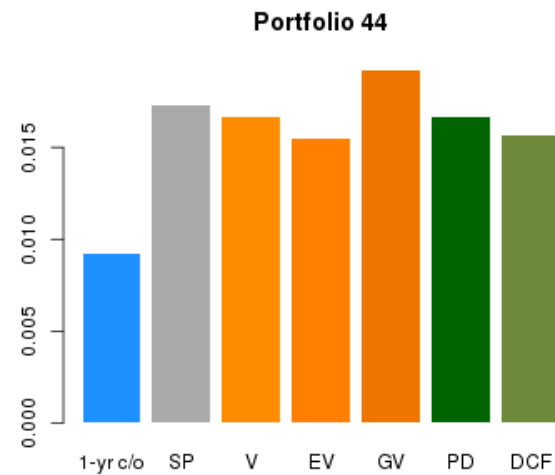
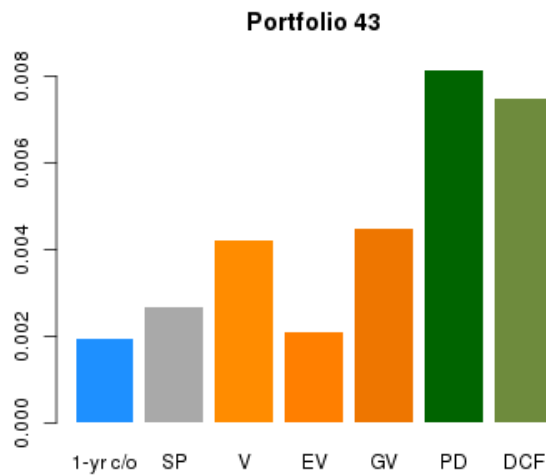
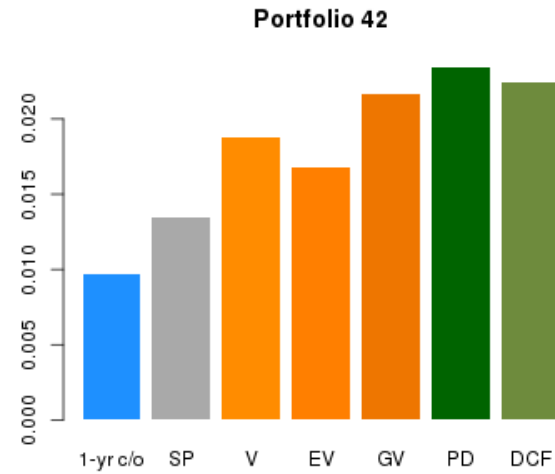
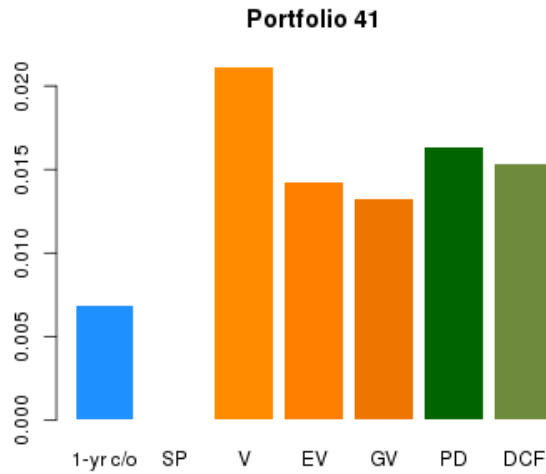
- Institution effect or missing c/o data

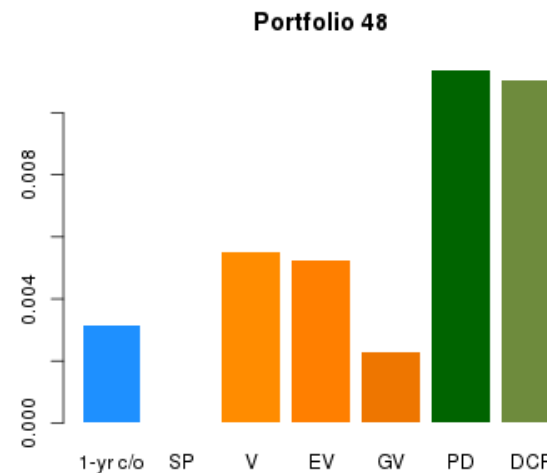
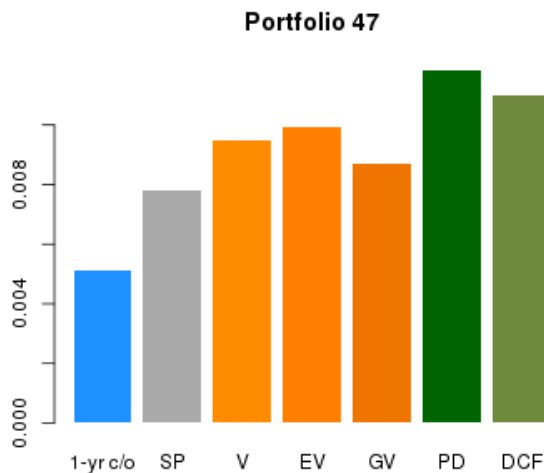
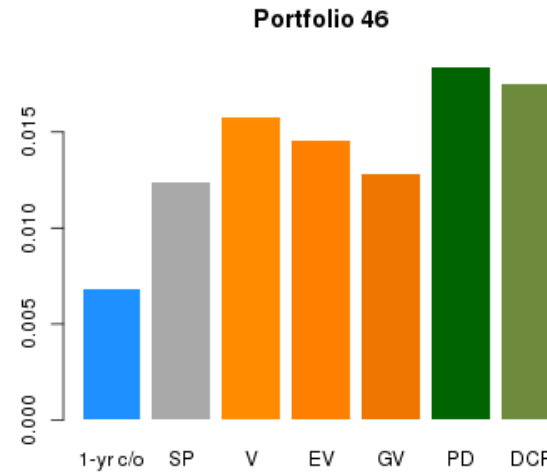
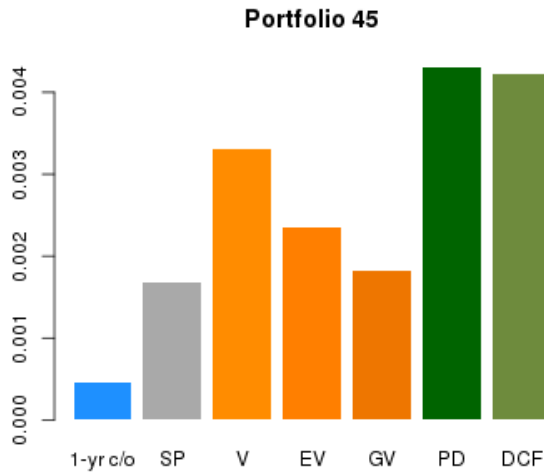


- Only 430/2900 loans PD-eligible. Not representative.

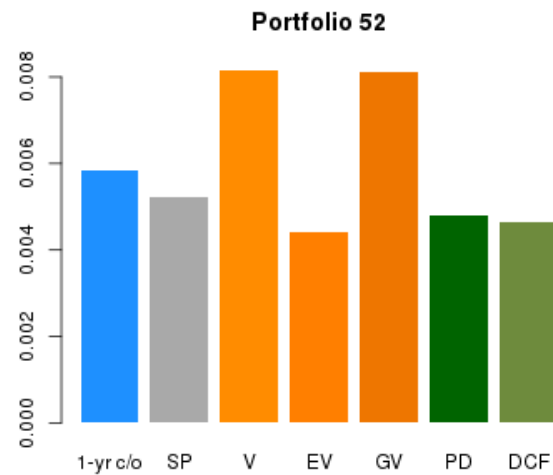
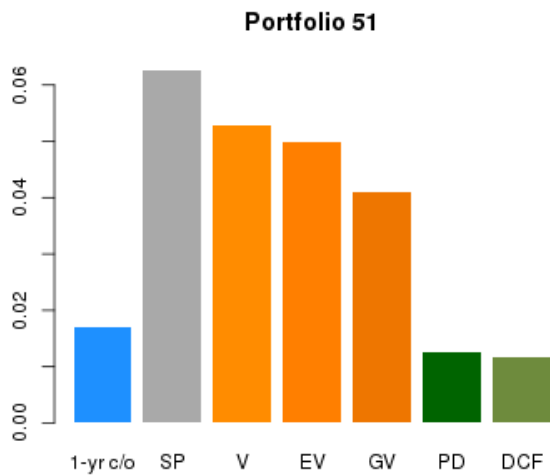
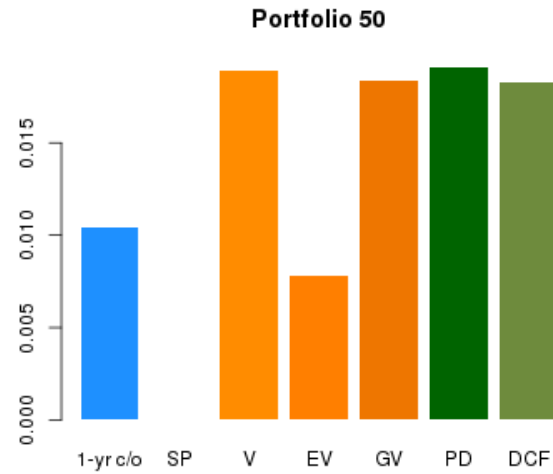
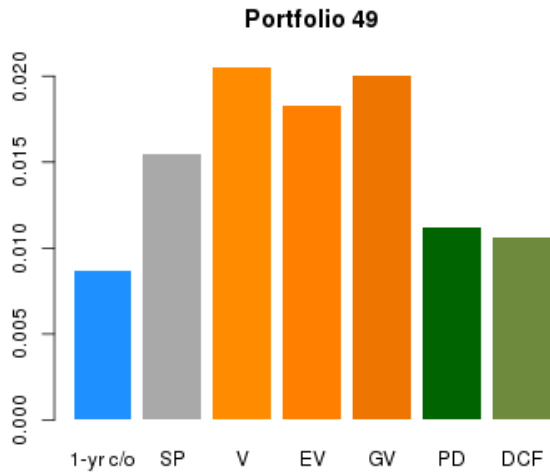




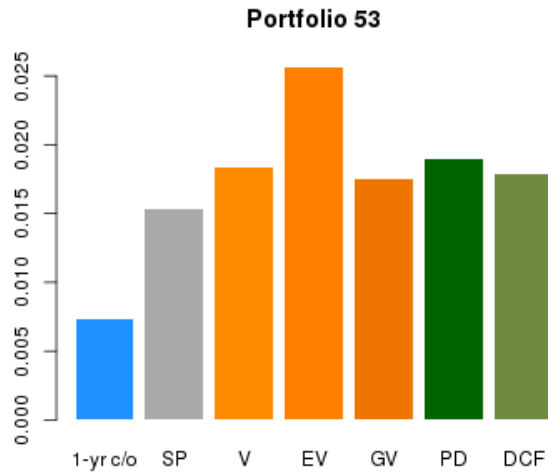


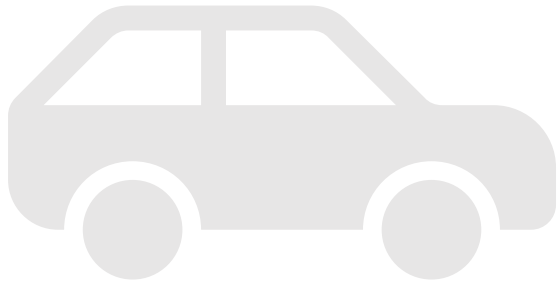


- Few loans have auto collateral data for PD. Small sample size issue.



- Institution effect or data issue





Auto Loan Study



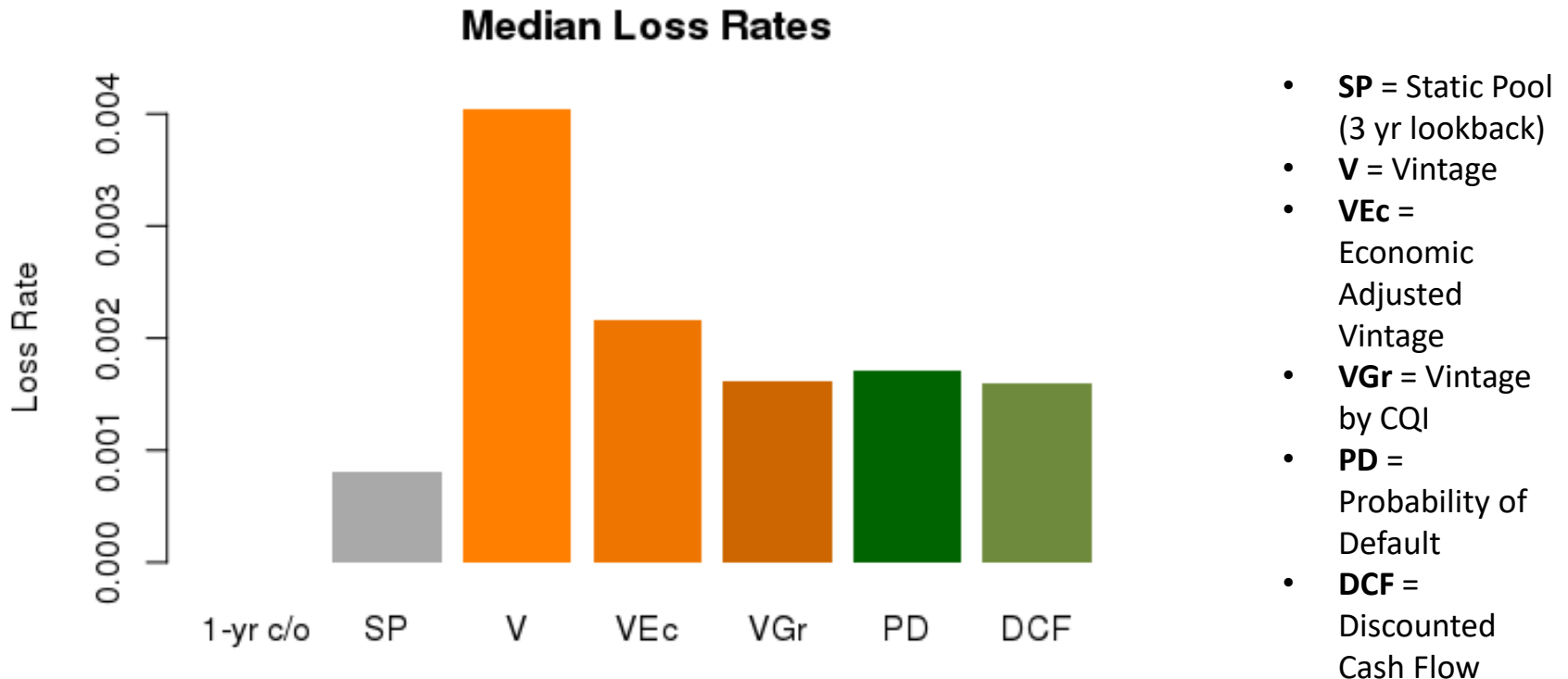
1st Mortgage Study

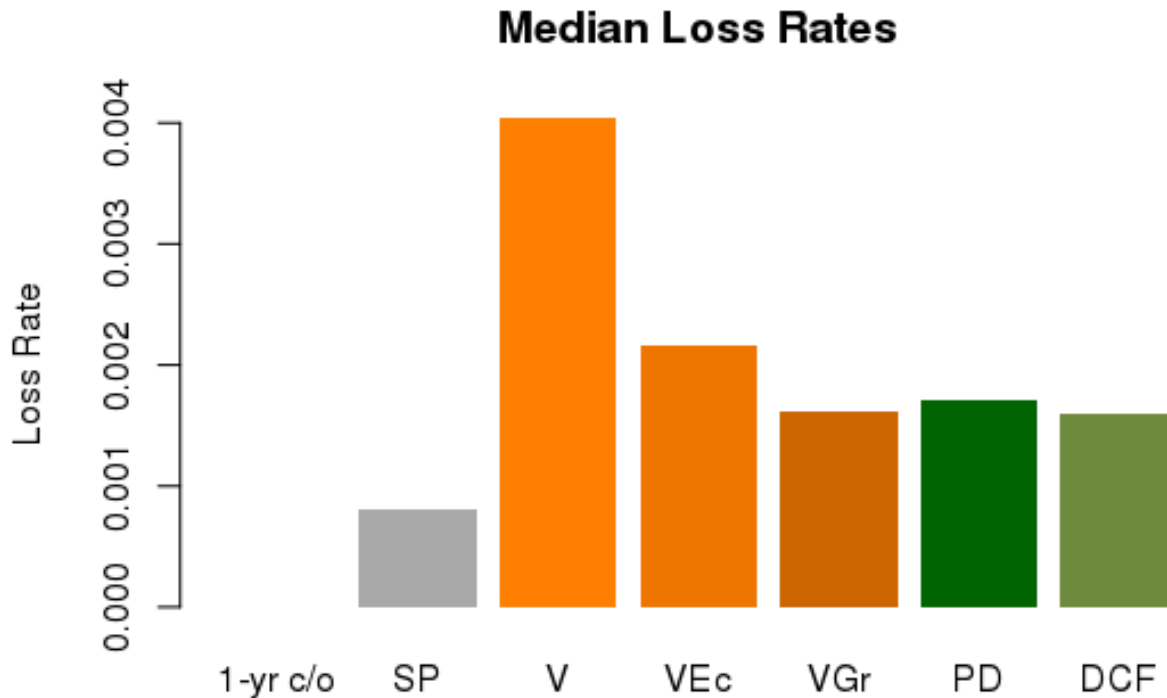
(Coming soon: Credit Card, Business, etc.)

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ition, this) 1))
```

- Monthly, loan-level 1st Mortgage records uploaded by Visible Equity users
- 60 institutions selected based on data quality and completeness
- Balance data since 2010, charge-off data since 1980s

Aggregate Results



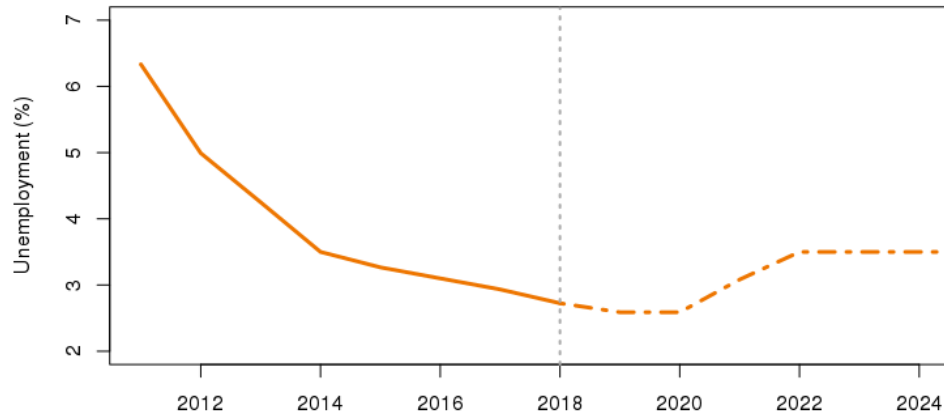


Takeaways:

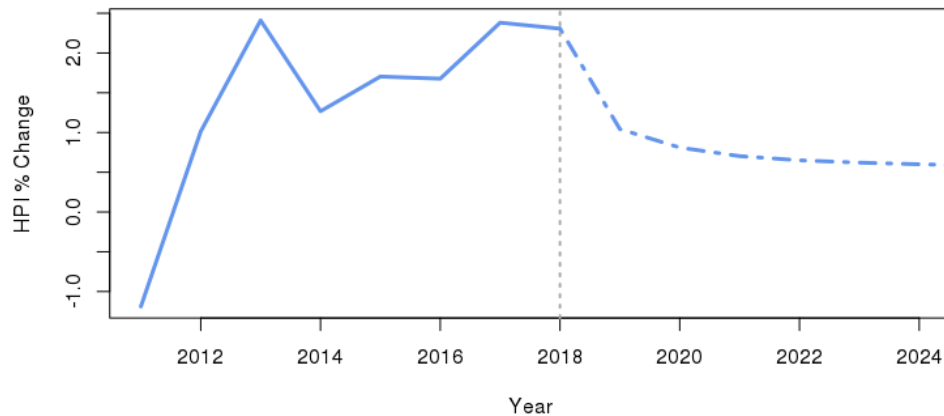
- 3 years not enough for static pool
- Crisis results in high median raw vintage (V)
- Otherwise, methods similar

- Even more variation by method within an institution than for auto classes
- Low incidence of charge-offs makes loss rate methods more volatile
- Collateral recovery rates really matter
- Given the crisis, raw vintage or static pool rates without proper adjustment may be too conservative

MSA Unemployment Time Series



HPI Quarter/Quarter % Change



- Significant economic changes over data history
- Adjustments important!

Thank You

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