

Bank of America



Industry Panel Discussion

**OCC Validation of Credit Rating and Scoring
Models Workshop
February 3, 2006**

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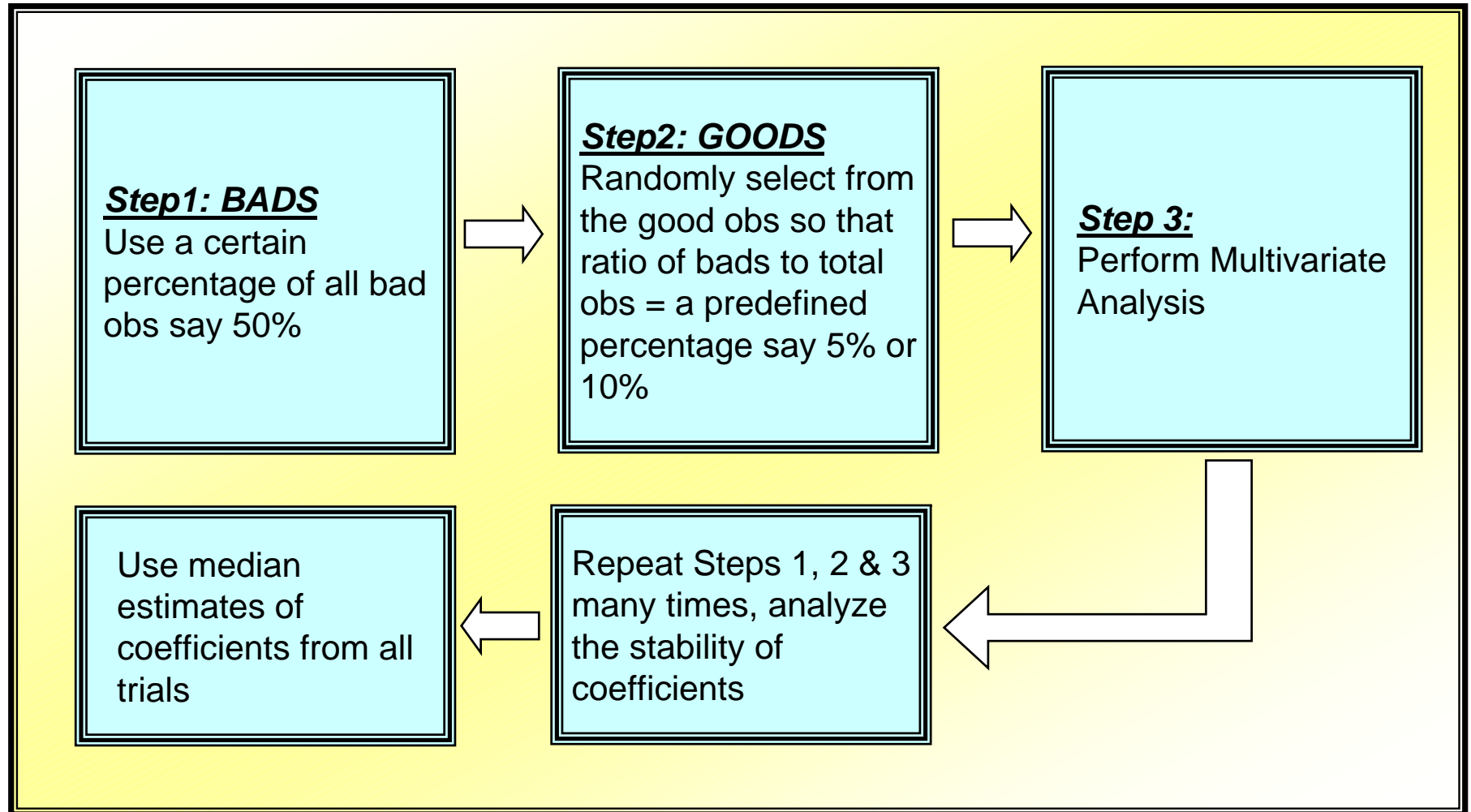
SMALL SAMPLE CONUNDRUM

“It is difficult to create a robust development sample, and you are also asking me to create a validation sample as well !”

The Constraints:

- Defaults are rare, creation of multiple samples is difficult
- Data used for building models should include a long enough time horizon to capture the impact of economic cycle
- A model that works well on one sample may not work well on another

JACK-KNIFING AS AN APPROACH



ADVANTAGES OF JACK-KNIFING

- Ensures stability through various cross-sections
- Coefficients are not unduly influenced by outliers.
- Much more robust than a “*development and validation sample*” approach
- Validation and development can be done simultaneously

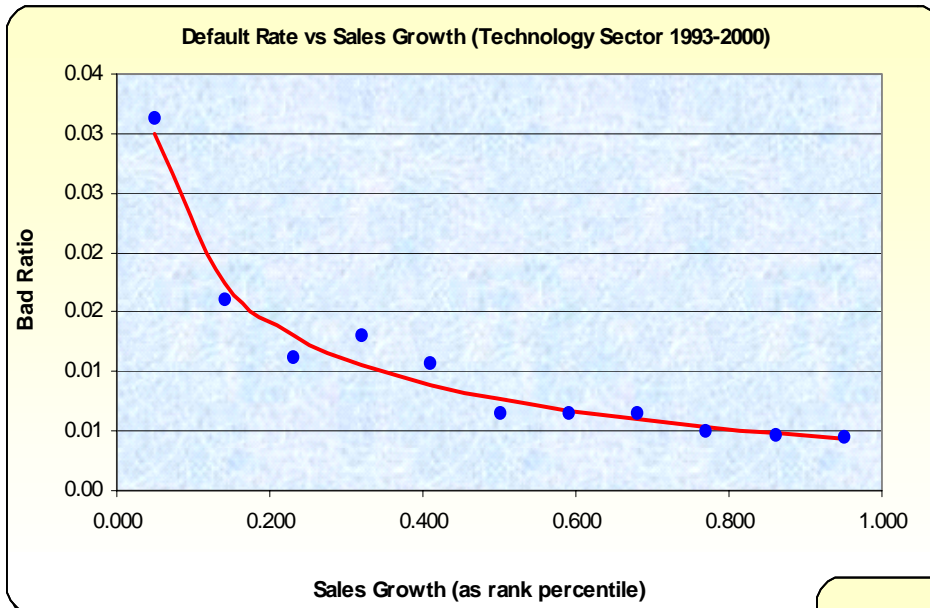
REGIME SHIFTING

The irrational exuberance of very good back-testing results can quickly evaporate with regime shifts.

Some Examples:

- Sudden change in relationship of a variable on defaults
- Use of size measures in a model
- Structural changes

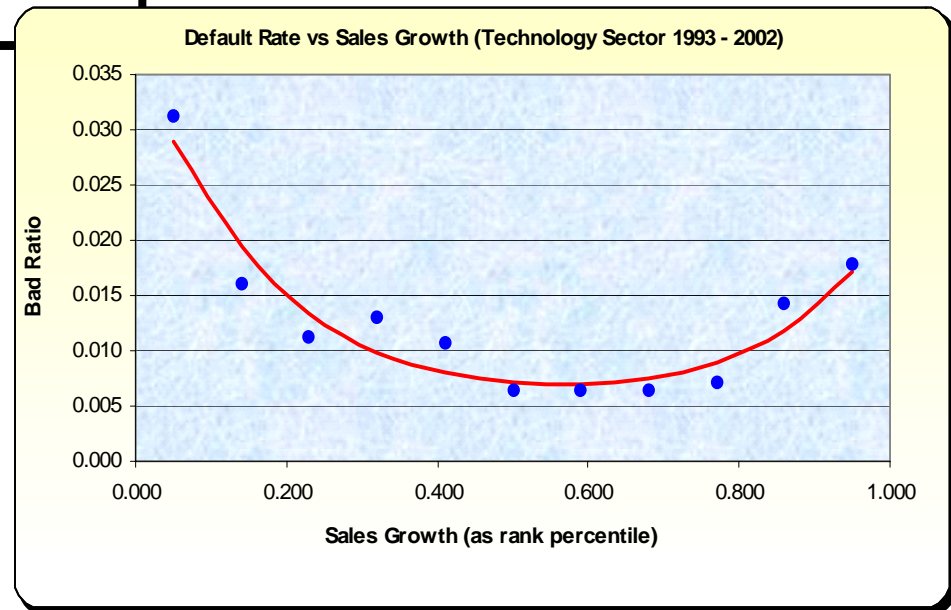
RELATIONSHIP OF A VARIABLE ON DEFAULTS



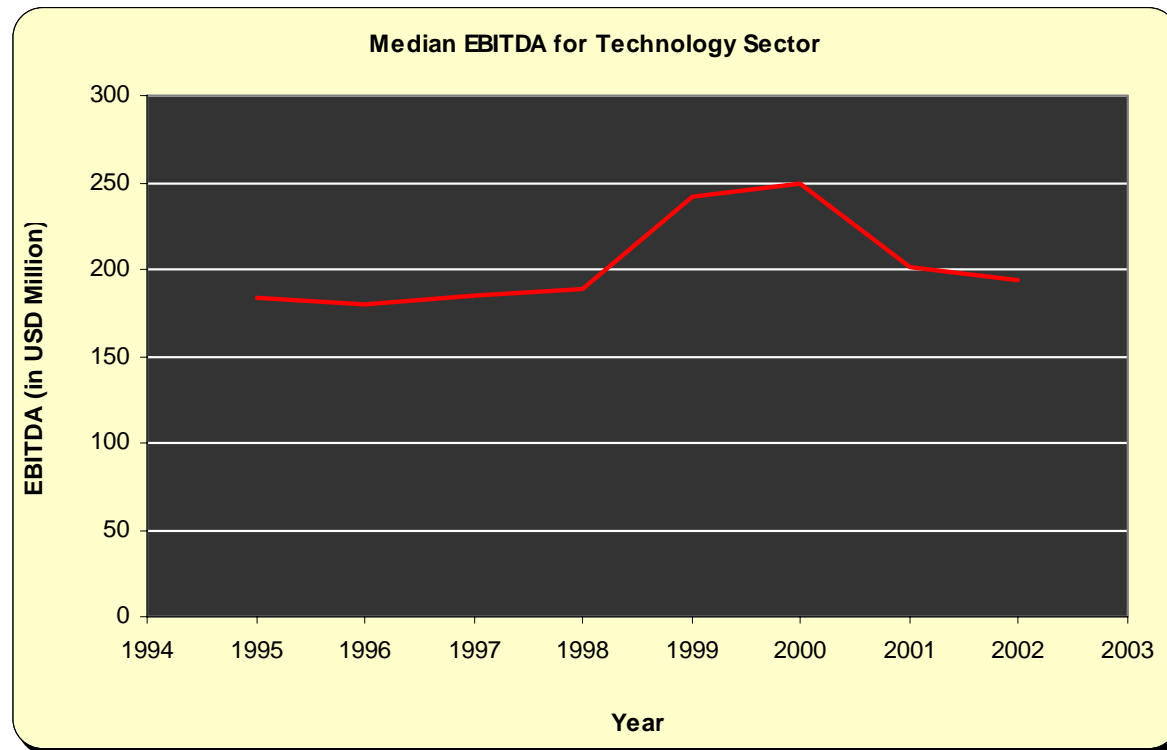
The relationship between a variable and defaults could change quite dramatically with time.

Mitigation:

- Samples spanning over long horizon
- Check for changes in relationship
- Use most recent trends
- Continuous monitoring



SIZE MEASURES MAY CHANGE



- In many sectors EBITDA has very good predictive power.
- However, if a size measure is used periodic re-calibration is required

STRUCTURAL CHANGES

- Sometimes variables not used in a model can suddenly become important on account of structural changes in an industry or in the whole economy
- Example:
 - Under-funding of pension benefits (Should a portion of such under-funding be included when calculating leverage?)
- Mitigation:
 - Keep our eyes and ears open