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Sent: Friday, November 09, 2018 12:40 PM

To: Alternative Reference Rates Committee

Subject: [External] ARRC COMMENT PERIOD

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With respect to the issue regarding amendments/hardwiring solution for the LIBOR transition, we concluded that a standard hardwired approach consistently applied across the whole market (loans, derivatives, etc.) which avoids gamesmanship by market participants will be the best approach.

Regards

Mike

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