

Alternative Reference Rates Committee (ARRC)

Minutes for the November 17, 2021 Meeting

The ARRC Chair welcomed participants to the virtual meeting. The Chair highlighted the FCA's [November 16 announcement](#) which confirmed rules for legacy use of synthetic sterling and yen LIBOR rates in all legacy contracts and again confirmed regulatory prohibitions against new use of USD LIBOR for UK-supervised entities after December 31, 2021. The Chair also noted the 2022 meeting dates while iterating that the frequency could be increased or decreased if needed.

The ARRC members then discussed a revised draft of ARRC recommended fallbacks for 1-week and 2-month USD LIBOR in connection with the New York legislation. ARRC members were asked to provide any additional feedback on the draft recommendations.¹

The Legal Working Group provided an update on the status of federal legislation to provide a narrow solution for legacy contracts that cannot effectively be amended to fallback to an alternative reference rate upon LIBOR's cessation. While emphasizing the critical importance of having a federal legislative solution, the Working Group Chairs noted that work to promote potential legislation in other states was also ongoing in the event a state-by-state approach is needed. Members were encouraged to reach out to state banking associations to raise awareness of the efforts.

The new chairs of the Operations / Infrastructure Working Group provided an update on the strategy of the revamped working group. ARRC members were asked to review their respective memberships for the working group to ensure the appropriate people are involved in the work going forward.

It was noted that the Market Risk Advisory Committee (MRAC) of the Commodity Futures Trading Commission (CFTC) was finalizing their recommendations for the fourth phase of the [SOFR First](#) trading convention switches, which is focused on exchange traded futures, including but not limited to the Eurodollar futures and options markets. The MRAC has previously recommended that cross-currency swaps referencing USD, CHF, JPY and GBP should utilize RFRs in each currency instead of LIBOR as of September 21, 2021. This additional SOFR First recommendation is intended to capture the USD leg of all other cross-currency derivative transactions, regardless of the accompanying non-USD currency leg.²

On the year-end outlook, members discussed a draft survey to help gauge ARRC members' sentiment regarding progress on the LIBOR transition as year-end approaches. The purpose of the survey is to track progress and to also identify areas where the ARRC can be helpful with

¹ The final recommendation was [published](#) by the ARRC on December 3, 2021.

² The CFTC [announced](#) its selection of the SOFR First switching date for additional cross-currency derivatives on December 2, 2021.

moving the transition forward. Members agreed to proceed with the survey, and it was noted that the survey would be sent out shortly after the meeting for ARRC member responses.

The ARRC Chair closed the meeting by thanking everyone and reminding everyone of the next ARRC meeting to be held December 16th via Webex.

Attendance at the November 17, 2021 Meeting*

ARRC Members

American Bankers Association
American Bankers Association
Association for Financial Professionals
Bank of America
Bank of America
Bank of America
Bank of New York Mellon
Bank of New York Mellon
Bank of New York Mellon
BlackRock
CME Group
CRE Finance Council
CRE Finance Council
Citigroup
Citigroup
Comerica
Deutsche Bank
Deutsche Bank
Equitable
Fannie Mae
Federal Home Loan Bank Office of Finance
Federal Home Loan Bank of New York
Ford Motor Company
Freddie Mac
Freddie Mac
Freddie Mac
Goldman Sachs
Government Finance Officers Association
HSBC
Huntington
Independent Community Bankers of America
Intercontinental Exchange
International Swaps and Derivatives Association
JP Morgan Chase & Co.
JP Morgan Chase & Co.
JP Morgan Chase & Co.
KKR
LCH
Loan Syndications and Trading Association
Loan Syndications and Trading Association
MetLife

Andrew Guggenheim
Hu Benton
Tom Hunt
Greg Todd
Janet Choi
Sonali Theisen
Jason Granet
Jeanne Naughton-Carr
Oliver Bader
Jack Hattem
Agha Mirza
Raj Aidasani
Sairah Burki
Jeannine Hyman
Josie Evans
Dave J Shipka
Adam Eames
Kayam Rajaram
Julien Zusslin
Wells Engledow
Kyle Lynch
Rei Shinozuka
Jason Behnke
Ameez Nanjee
Guim Barbour
Michelle Thomas
Guillaume Helie
Emily Brock
Shirley Hapangama
Beth Russell
Chris Cole
Harvey Flax
Ann Battle
Alice Wang
Emilio Jimenez
John Van Etten
Tal Reback
Phil Whitehurst
Meredith Coffey*
Tess Virmani
Alex Strickler

MetLife
MetLife
Morgan Stanley
Morgan Stanley
Morgan Stanley
Morgan Stanley
National Association of Corporate Treasurers
PNC
PNC
Pacific Investment Management Company
Prudential Financial
Prudential Financial
Securities Industry and Financial Markets Association
Structured Finance Association
Structured Finance Association
TD Bank
TD Bank
US Chamber of Commerce
Wells Fargo
Wells Fargo

Joe Demetrick
William Ding
Tom McCrocklin
Maria Douvas-Orme
Matt Ochs
Tom Wipf
Tom Deas
Alexander Spiro
Andrew Wilson
Jerry Woytash
Chris Mcalister
Jason Pan
Chris Killian
Jennifer Earyes
Kristi Leo
Greg Moore
Priya Misra
Kristen Malinconico
Alexis Pederson
Brian Grabenstein

Ex-Officio ARRC Members

Commodity Futures Trading Commission
Consumer Financial Protection Bureau
Federal Deposit Insurance Corporation
Federal Housing Finance Agency
Federal Housing Finance Agency
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Bank of New York
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Federal Reserve Board of Governors
Office of Financial Research

Alicia Lewis
Abhishek Agarwal
Irina Leonova
Daniel Coates
Muna Sisay
Betsy Bourassa
Cam Fuller
Caren Cox
Fatima Madhany
Jamie Pfeifer
Justine Hansen
Nathaniel Wuerffel
Ray Check
Will Riordan
Scott Sherman
Megan Zirinsky
Darren Gersh
David Bowman
Erik Heitfield
Evan Winerman
Jeffrey Huther
Robert Kahn

Office of the Comptroller of the Currency
Office of the Comptroller of the Currency
U.S. Department of Housing and Urban Development
U.S. Securities and Exchange Commission
U.S. Securities and Exchange Commission
U.S. Treasury
U.S. Treasury
U.S. Treasury
U.S. Treasury

Observers

BNP Paribas
BNP Paribas
Bank of Canada
BlackRock
Brunswick
Cadwalader
Cadwalader
Deloitte
Morgan Lewis

Ang Middleton
Kevin Walsh
Mike Nardacci
Jason Leung
Michelle Danis
Brian Smith
Daniel Harty
Dini Ajmani
Joshua Frost

Simon Winn
Christophe Rousseau
Sheryl King
Alex Krol
Jeanmarie McFadden
LaryStromfeld
Victor Bieger
Alexey Surkov
Jon Roellke

*This meeting was held via WebEx; asterisk indicates participation by dial-in.