Mapping of Scope Rating’s credit assessments under the Standardised Approach

1. Executive summary
2. This report describes the mapping exercise carried out by the Joint Committee to determine the ‘mapping’[[1]](#footnote-2) of the credit assessments of Scope Rating (Scope).
3. The methodology applied to produce the mapping is the one specified in the Commission’s Implementing Regulation (EU) 2016/1799 (‘the Implementing Regulation’) laying down Implementing Technical Standards (ITS) with regard to the mapping of credit assessments of External Credit Assessment Institutions (ECAIs) for credit risk in accordance with Articles 136(1) and (3) of the Regulation (EU) No 575/2013 of the European Parliament and the Council (‘the CRR’). This Implementing Regulation employs a combination of the provisions laid down in Article 136(2) CRR.
4. The mapping neither constitutes the one which ESMA shall report on in accordance with Article 21(4b) of Regulation (EC) No 1060/2009 (Credit Rating Agencies Regulation - CRA) with the objective of allowing investors to easily compare all credit ratings that exist with regard to a specific rated entity[[2]](#footnote-3) nor should be understood as a comparison of the rating methodologies of Scope with those of other ECAIs. This mapping should however be interpreted as the correspondence of the rating categories of Scope with a regulatory scale which has been defined for prudential purposes. This implies that an appropriate degree of prudence may have been applied wherever not sufficient evidence has been found with regard to the degree of risk underlying the credit assessments.
5. As described in Recital 12 of the Implementing Regulation, it is necessary to avoid causing undue material disadvantage on those ECAIs which, due to their more recent entrance in the market, present limited quantitative information, with the view to balancing prudential with market concerns. Therefore, the relevance of quantitative factors for deriving the mapping should be relaxed. This allows ECAIs which present limited quantitative information to enter the market and increases competition. Updates to the mapping should be made wherever this becomes necessary to reflect additional quantitative information collected after the entry into force of the revised draft ITS.
6. The resulting mapping tables have been specified in Annex III of the Implementing Technical Standards on the mapping of ECAIs’ credit assessments under Article 136(1) and (3) of Regulation (EU) No 575/2013. Figure 1 below shows the result for the main ratings scale of Scope, the Global long-term rating scale.

Figure 1: Mapping of Scope’s Global long-term rating scale rating scale

|  |  |
| --- | --- |
| **Credit assessment** | **Credit quality step** |
| **AAA** | **1** |
| **AA** | **1** |
| **A** | **2** |
| **BBB** | **3** |
| **BB** | **4** |
| **B** | **5** |
| **CCC** | **6** |
| **CC** | **6** |
| **C** | **6** |
| **D** | **6** |

1. Introduction
2. This report describes the mapping exercise carried out by the Joint Committee (JC) to determine the ‘mapping’ of the credit assessments of Scope Rating (Scope).
3. Scope is a credit rating agency that has been registered with ESMA in 24 May 2011 and therefore meets the conditions to be an eligible credit assessment institution (ECAI)[[3]](#footnote-4). Scope focuses on the evaluation of the economic stability and the default risk of companies.
4. The methodology applied to produce the mapping is the one specified in the Commission’s Implementing Regulation (EU) 2016/1799 (‘the Implementing Regulation’) laying down Implementing Technical Standards (ITS) with regard to the mapping of credit assessments of External Credit Assessment Institutions (ECAIs) for credit risk in accordance with Articles 136(1) and (3) of the Regulation (EU) No 575/2013 of the European Parliament and the Council (‘the CRR’). This Implementing Regulation employs a combination of the provisions laid down in Article 136(2) CRR. Two sources of information have been used. Firstly, the quantitative and qualitative information available in ESMA Central Repository (CEREP[[4]](#footnote-5)) has been used to obtain an overview of the main characteristics of this ECAI and an initial estimate of the default rates of its credit assessments. Secondly, since the available data in CEREP for Scope is scarce, specific information has also been directly requested to the ECAI for the purpose of the mapping, especially the list of relevant credit assessments, scoring information and detailed information regarding the default definition.
5. The following sections describe the rationale underlying the mapping exercise carried out by the Joint Committee (JC) to determine the mappings. Section 3 describes the relevant ratings scales of Scope for the purpose of the mapping. Section 4 contains the methodology applied to derive the mapping of Scope’s main ratings scale, whereas Section 5 refers to the mapping of its remaining relevant rating scale. The mapping tables are shown in Appendix 6 of this document and have been specified in Annex III of the Implementing Technical Standards on the mapping of ECAIs’ credit assessments under Article 136(1) and (3) of Regulation (EU) No 575/2013.
6. Scope credit ratings and rating scales
7. Scope produces a variety of credit ratings. Column 2 of Figure 2 in Appendix 1 shows the relevant credit ratings that may be used by institutions for the calculation of risk weights under the Standardised Approach (SA)[[5]](#footnote-6):

* **Issuer credit-strength rating (ICSR)**
* **Senior unsecured debt rating**
* **Senior unsecured long-term debt rating**
* **Senior secured long-term debt rating**
* **Subordinated debt rating**
* **Capital securities rating**
* **Long-term issue rating**
* **Short-term issuer credit strength rating**
* **Short-term issue rating**

1. These ratings can be divided into two groups, the credit ratings and the ratings of capital securities. Scope provides a general definition for both groups:

* The credit ratings reflect a credit opinion on a debt issuer’s ability to meet its contractual financial commitments – either long-term or short-term – on a timely basis and in full as a going concern. As such credit ratings point to the relative default risk of debt issuers as well as the potential loss severity should a default occur.
* The ratings of capital securities reflect a credit opinion on the issuer’s ability to meet its financial commitments on a timely basis and in full as a going concern even if contractually payments can be missed subject to specific conditions.

1. Scope assigns these credit ratings to different rating scales as illustrated in column 3 of Figure 2 in Appendix 1. Therefore, a specific mapping has been prepared for the following rating scales:

* **Global long-term rating scale.** The specification of this rating scale is described in Figure 3 of Appendix 1.
* **Global short-term rating scale.** The specification of this rating scale is described in Figure 4 of Appendix 1.

1. The mapping of the Global long-term rating scale is explained in Section 4 and it has been derived in accordance with the quantitative factors, qualitative factors and benchmarks specified in the ITS.
2. The mapping of the Global short-term rating scale is explained in Section 5 and it has been indirectly derived from the mapping of the Global long-term rating scale and the internal relationship established by Scope between these two scales, as specified in Article 13 of the ITS. This internal relationship is shown in Figure 5 of Appendix 1.
3. Mapping of Scope’s Global long-term rating scale rating scale
4. The mapping of the Global long-term rating scale has consisted of two differentiated stages where the quantitative and qualitative factors as well as the benchmarks specified in Article 136(2) CRR have been taken into account.
5. In the first stage, the quantitative factors referred to in Article 1 of the ITS have been taken into account to differentiate between the levels of risk of each rating category. The *long run default rate* of a rating category has been calculated in accordance with Article 6 of the ITS, as the number of credit ratings cannot be considered to be sufficient.
6. In a second stage, the qualitative factors proposed in Article 7 of the ITS have been considered to challenge the result of the previous stage, especially in those ratings categories where less default data has been available.
   1. Initial mapping based on the quantitative factors
      1. Calculation of the long-run default rates
7. The information contained in CEREP on ratings and default data, shown in Figure 8 and Figure 9 in Appendix 4, cannot be considered sufficient for the calculation of the short and long run default rates specified in the Articles 3 – 5 of the ITS since the number of rated items is below the required minimum. As a result, the allocation of the CQS has been made in accordance with Article 6 of the ITS, as shown in Figure 10 and Figure 11 of Appendix 4.
8. The long run default rate benchmark associated with the equivalent category in the international rating scale is a key qualitative factor that has been used for the mapping proposal.
9. For D rating category, no allocation has been made based on this methodology since it already reflects a ‘default’ situation.
10. Withdrawn ratings have been weighted by 50% as indicated in Article 4(3) of the ITS.
11. The default definition applied by Scope, described in Appendix 3, has been used for the calculation of default rates.
    * 1. Mapping proposal based on the long run default rate
12. As illustrated in the second column of Figure 16 and Figure 17 and in Appendix 6, the assignment of the rating categories to credit quality steps has been initially made in accordance with Article 6 of the ITS. Therefore, the numbers of defaulted and non-defaulted rated items have been used together with the prior expectation of the equivalent rating category of the international rating scale. The results are specified in Figure 10 of Appendix 4.

* **AAA/AA/A/BBB/BB/B:** the number of rated items in each of these categories is equal or larger than the respective minimum required number of observed items given the number of defaulted items in the rating category. Thus the credit quality steps associated with the AAA/AA, A, BBB, BB, B rating categories in the international rating scale (CQS 1, CQS 2, CQS 3, CQS 4 and CQS 5 respectively) can be assigned.
* **CCC/CC/C:** since the CQS associated with the equivalent rating categories of the international rating scale is 6, the proposed mapping for these rating categories is also CQS 6.
  1. Final mapping after review of the qualitative factors

1. The qualitative factors specified in Article 7 of the ITS have been used to challenge the mapping proposed by the default rate calculation. Qualitative factors acquire more importance in the rating categories where quantitative evidence is not sufficient to test the default behavior[[6]](#footnote-7), as it is the case for all rating categories of Scope’s Global long-term rating scale.
   * 1. Credit scoring information
2. As described in the previous sections, a sufficient number of credit ratings is not available for Scope’s rating categories. However, Scope also assigns **credit scorings** which represent a different measure of creditworthiness than can be used for mapping purposes according to Article 11(2) of the ITS. The empirical relationship between credit scorings and credit ratings has been applied to the distribution of credit scorings (Figure 12) to estimate the distribution of hypothetical ratings in the scoring population. The result is shown in Figure 13 and the first columns of Figure 14 and Figure 15 in Appendix 4.
3. Once the (hypothetical) rating distribution has been calculated, the long term default rate associated with each rating category needs to be determined. The observed default rates are not available because defaulted and non-defaulted items cannot be distinguished during the assignment process to hypothetical rating categories. Therefore, the long run default rates[[7]](#footnote-8) of rating categories have been indirectly estimated by means of a set of informal tests:

* The long run default rate benchmarks corresponding to the CQS of the equivalent international rating categories have been initially assumed. In this case, AAA, AA, A, BBB, BB, B and CCC have been associated with 0.10%, 0.10%, 0.25%, 1.00%, 7.50%, 20.00% and 34.00% hypothetical long run default rates respectively.
* An overall benchmark-implied long run default rate has been calculated for the scoring population. This number, 21.02%, has been compared to the actually observed default rate[[8]](#footnote-9) 5.85% (see for example Figure 14). The result reflects that the long run benchmark could constitute a conservative estimate of Scope’s rating categories’ long term default rates because the implied default rate is well above the observed value. This result is reinforced by the fact that Scope’s scoring population has been observed during a recessionary period, where default rates should be expected to be higher than their long-term level.
* The same test has been performed at a more granular level:
  + Figure 14 shows the benchmark-implied default rates of the scoring population for each date within the observation period. The levels are in all cases significantly above the observed default rates.
  + Figure 15 shows a different breakdown of the scoring population, this time by scoring category. Again, the benchmark-implied default rates are clearly above the observed default rates, except for the BBB scoring category, where the observed default rate is close to the implied one.

1. Although the tests described above do not address the default rate calculation for each individual rating category, they suggest that the mapping of Scope’s rating categories to the CQS of the equivalent rating categories in the international scale could be sufficiently prudent, at least on a portfolio basis[[9]](#footnote-10). This factor confirms the mapping based on Article 6 of the ITS, given also the consistency with the meaning and relative position of the rating categories. Thus no change is proposed to the mapping based on this factor.
   * 1. Other qualitative factors
2. The **definition of default** applied by Scope and used for the calculation of the quantitative factors has been analysed:

* The types of default events considered are shown in Appendix 3 and correspond to the ones specified in Article 4(4) of the ITS. D is consistent with letters (a), (b), (c) and (d) of the benchmark definition.
* Since there are no reported defaults, it is not possible to assess the severity of Scope’s definition of default.

Therefore, no adjustment is proposed based on this factor.

1. Regarding **the meaning and relative position of the credit assessments**, it is in line with the proposed mapping..
2. Regarding the **time horizon** reflected by the rating category, Scope’s rating methodology focuses on the long-term. Although this cannot be further supported by transition probabilities due to the low number of ratings, no change is proposed to the mapping.
3. Finally, it should be highlighted the use of the long run default rate benchmark associated with the equivalent category in the international rating scale as the **estimate of the long run default rate** for the calculation of the quantitative factor of all rating categories under Article 6 of the ITS.
4. Mapping of Scope’s Global short-term rating scale
5. Scope also produces short-term ratings and assigns them to the Global short-term rating scale(see Figure 4 in Appendix 1). Given that the default information referred to these rating categories cannot be comparable with the 3-year time horizon that characterizes the benchmarks established in the ITS, the internal relationship established by Scope between these two rating scales (described in Figure 5 of Appendix 1) has been used to derive the mapping of the Global short-term rating scale. This should ensure the consistency of the mappings proposed for Scope.
6. More specifically, as each short-term rating can be associated with a range of long-term ratings, the CQS assigned to the short-term rating category has been determined based on the most frequent CQS assigned to the related long-term rating categories. In case of draw, the most conservative CQS has been considered. If the most frequent step is identified as CQS 5 or 6, CQS 4 is allocated, as the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR
7. The results are shown in Figure 18 of Appendix 6.

* **S-1+.** This rating category indicates the highest capacity to repay short-term obligations with the lowest credit risk on a short-term basis. It is internally mapped to long-term categories AAA to A+, which are mapped to CQS 1 and CQS 2. Therefore, CQS 1 is the proposed mapping.
* **S-1.** This rating category indicates high capacity to repay short-term obligations with very low credit risk on a short-term basis. It is internally mapped to the long-term category AA- to A-, which are mapped to CQS 1 and CQS 2. Therefore, CQS 2 is the proposed mapping.
* **S-2.** This rating category indicates good capacity to repay short-term obligations with low credit risk on a short-term basis. It is internally mapped to long-term categories A to BBB-, which are mapped to CQS 2 and 3, but mostly CQS 3. Therefore, CQS 3 is the proposed mapping.
* **S-3.** This rating category indicates a fair capacity to repay short-term obligations with acceptable credit risk on a short-term basis. It is internally mapped to long-term categories BBB to BB-, which are mapped to CQS 3 and 4, but mostly CQS 4. Since the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR, the mapping proposed for the S-3 rating category is CQS 4.
* **S-4.** This rating category indicates low capacity to repay short-term obligations, with high credit risk on a short-term basis. It is internally mapped to long-term categories BB to C, which are mapped to CQS 4 to 6, but mostly CQS 6. Since the risk weights assigned to CQS 4 to 6 are all equal to 150% according to Article 131 CRR, the mapping proposed for the S-4 rating category is CQS 4.

Appendix 1: Credit ratings and rating scales

Figure 2: Scope’s relevant credit ratings and rating scales

|  |  |  |
| --- | --- | --- |
| SA exposure classes | Name of credit rating | Credit rating scale |
| **Long-term ratings** |  |  |
| Institutions | Corporate long-term rating | Global long-term rating scale |
|  | Issuer credit-strength rating (ICSR) | Global long-term rating scale |
|  | Senior unsecured debt rating | Global long-term rating scale |
|  | Subordinated debt rating | Global long-term rating scale |
|  | Capital securities rating | Global long-term rating scale |
| Corporates | Issuer credit-strength rating (ICSR) | Global long-term rating scale |
|  | Senior secured long-term debt rating | Global long-term rating scale |
|  | Senior unsecured long-term debt rating | Global long-term rating scale |
|  | Subordinated debt rating | Global long-term rating scale |
| Covered bonds | Long-term issue rating | Global long-term rating scale |
| **Short-term ratings:** |  |  |
| Institutions | Short-term issue rating | Global short-term rating scale |
|  | Short-term issuer credit-strength rating | Global short-term rating scale |
|  | Short-term issue rating | Global short-term rating scale |

Source: Scope

Figure 3: Global long-term rating scale

|  |  |
| --- | --- |
| Credit assessment | Meaning of the credit assessment |
| AAA | Ratings at the AAA level reflect an opinion of the strongest credit quality with the lowest default risk. |
| AA | Ratings at the AA level reflect an opinion of strong credit quality with very low default risk. |
| A | Ratings at the A level reflect an opinion of good credit quality with low default risk. |
| BBB | Ratings at the BBB level reflect an opinion of moderate credit quality with acceptable default risk. |
| BB | Ratings at the BB level reflect an opinion of weak credit quality with material default risk and potentially marginal loss-severity risk upon default. |
| B | Ratings at the B level reflect an opinion of very weak credit quality with high default risk and potentially limited loss-severity risk upon default. |
| CCC | Ratings at the CCC level reflect an opinion of poor credit quality with very high default risk and potentially material loss-severity risk upon default. |
| CC | Ratings at the CC level reflect an opinion of very poor credit quality with extremely high default risk and potentially very material loss-severity risk upon default. |
| C | Ratings at the C level reflect an opinion of extremely poor credit quality with extremely high default risk and potentially material loss-severity risk upon default. |
| D | Ratings at the D level refer to credit default situations. |

Source: Scope

Figure 4: Global short-term rating scale

|  |  |
| --- | --- |
| Credit assessment | Meaning of the credit assessment |
| S-1+ | Ratings at the S-1+ level reflect an opinion of the highest capacity to repay short-term obligations with the lowest credit risk on a short-term basis. |
| S-1 | Ratings at the S-1 level reflect an opinion of high capacity to repay short-term obligations with very low credit risk on a short-term basis. |
| S-2 | Ratings at the S-2 level reflect an opinion of good capacity to repay short-term obligations with low credit risk on a short-term basis. |
| S-3 | Ratings at the S-3 level reflect an opinion of fair capacity to repay short-term obligations with acceptable credit risk on a short-term basis. |
| S-4 | Ratings at the S-4 level reflect an opinion of low capacity to repay short-term obligations, with high credit risk on a short-term basis. |

Source: Scope

Figure 5: Internal relationship between Scope’s Global long-term and short-term rating scales

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Long-Term** | **Short-Term** | | | | |
| AAA | S-1+ |  |  |  |  |
| AA+ |  |  |  |  |
| AA |  |  |  |  |
| AA- | S-1 |  |  |  |
| A+ |  |  |  |
| A |  | S-2 |  |  |
| A- |  |  |  |
| BBB+ |  |  |  |  |
| BBB |  |  | S-3 |  |
| BBB- |  |  |  |
| BB+ |  |  |  |  |
| BB |  |  |  | S-4 |
| BB- |  |  |  |
| B+ |  |  |  |  |
| B |  |  |  |  |
| B- |  |  |  |  |
| CCC |  |  |  |  |
| CC |  |  |  |  |
| C |  |  |  |  |

Source: Scope

Appendix 2: Relationship between credit ratings and credit scorings assigned by Scope

Figure 6: Observed relationship between credit scorings and credit ratings assigned by Scope (2012 – 2014)

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Credit scoring Scope** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** |  |  |
| **Credit rating SCOPE** |  |  |  |  |  |  |  |  |  |
| **AAA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **AA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **A** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **BBB** | 0 | 0 | 0 | 9 | 0 | 0 | 0 | 0 | 0 |
| **BB** | 0 | 0 | 0 | 3 | 33 | 0 | 0 | 0 | 0 |
| **B** | 0 | 0 | 0 | 0 | 8 | 16 | 0 | 0 | 0 |
| **CCC** | 0 | 0 | 0 | 0 | 0 | 1 | 2 | 0 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 0 |
|  | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 1 | 0 |

Source: Joint Committee analysis based on CEREP and Scope data

Figure 7: Expected relationship between credit scorings and credit ratings assigned by Scope

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Financial risk** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** | **CC** | **C** |
| **Business risk** |  |  |  |  |  |  |  |  |  |
| **AAA** | AAA | AA | AA/A | A | A/BBB | BBB/BB | BB | BB/B | B |
| **AA** | AA | AA | AA/A | A/BBB | A/BBB | BBB/BB | BB/B | BB/B | B |
| **A** | AA | AA/A | A | A/BBB | BB/BB | BBB/BB | B | B | B/CCC |
| **BBB** | AA/A | AA/A | A/BBB | BBB | BBB/BB | BB/B | B | B/CCC | B/CCC |
| **BB** | A | A/BBB | A/BBB | BBB/BB | BB | BB/B | B/CCC | B/CCC | CCC |
| **B** | A/BBB | A/BBB | BBB/BB | BBB/BB | BB/B | B | CCC | CCC | CCC |
| **CCC** | A/BBB | BBB | BBB/BB | BB/B | BB/B | B/CCC | CCC | CCC/CC | CC/C |
| **CC** | BBB | BBB | BBB/BB | BB/B | B | B/CCC | CCC/CC | CC | CC/C |
| **C** | BBB | BBB | BBB/BB | BB/B | B | B/CCC | CCC/CC | CC/C | C |

Source: Scope

Appendix 3: Definition of default

Scope defines a corporate default as (i) a bankruptcy ii) a failed or delayed payment of interest and/or principal, including payments made within a grace period, or iii) a distressed exchange defined as a debt restructuring, a debt repurchase or any equivalent action initiated with the apparent aim of avoiding payment failure and ultimately leading to an economic loss or a diminished financial obligation for the debt investor.

Source: Scope

Appendix 4: Default rates of each rating category

Figure 8: Number of rated items

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Date** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC/CC/C** |
| 01/01/2007 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/07/2007 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 01/01/2008 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 01/07/2008 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 01/01/2009 | 0 | 0 | 0 | 0 | 1 | 0 | 0 |
| 01/07/2009 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| 01/01/2010 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| 01/07/2010 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |

Source: Joint Committee calculations based on CEREP data

Figure 9: Number of defaulted rated items

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Date** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC/CC/C** |
| 01/01/2007 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/07/2007 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/01/2008 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/07/2008 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/01/2009 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/07/2009 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/01/2010 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/07/2010 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Source: Joint Committee calculations based on CEREP data

Figure 10: Mapping proposal for rating categories with a non-sufficient number of credit ratings

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **AAA/AA** | **A** | **BBB** | **BB** | **B** | **CCC/CC/C** |
| CQS of equivalent international rating category | CQS 1 | CQS 2 | CQS 3 | CQS 4 | CQS5 | CQS 6 |
| N. observed defaulted items | 0 | 0 | 0 | 0 | 0 | 0 |
| Minimum N. rated items | 0 | 0 | 0 | 0 | 0 | n.a. |
| Observed N. rated items | 0 | 0 | 4 | 3 | 0 | 0 |
| **Mapping proposal** | **CQS 1** | **CQS 2** | **CQS 3** | **CQS 4** | **CQS 5** | **CQS 6** |

Source: Joint Committee calculations based on CEREP data

Appendix 5: Calculation of the hypothetical credit rating distribution

Figure 11: Distribution of scoring categories

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Date** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** | **CC** | **C** |
| 2007 | 2 | 1,627 | 8,497 | 17,121 | 28,020 | 41,618 | 39,083 | 4,376 | 9,072 |
| 2008 | 2 | 1,815 | 8,943 | 17,887 | 29,680 | 44,132 | 42,960 | 5,170 | 11,224 |
| 2009 |  | 1,727 | 8,887 | 18,427 | 29,907 | 44,907 | 46,213 | 6,307 | 14,253 |
| 2010 | 1 | 1,800 | 9,286 | 18,781 | 30,934 | 45,211 | 46,693 | 6,755 | 16,306 |

Source: Joint Committee calculations based on Scope data

Figure 12: Distribution of hypothetical credit ratings (observation date 2007)

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Credit scoring Scope** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** | **CC** | **C** | **Total** |
| **Hypothetical credit rating Scope** |  |  |  |  |  |  |  |  |  |  |
| **AAA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **0** |
| **AA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **0** |
| **A** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | **0** |
| **BBB** | 0 | 0 | 0 | 12841 | 0 | 0 | 0 | 0 | 0 | **12841** |
| **BB** | 0 | 0 | 0 | 4280 | 22553 | 0 | 0 | 0 | 0 | **26833** |
| **B** | 0 | 0 | 0 | 0 | 5467 | 39170 | 0 | 0 | 0 | **44637** |
| **CCC** | 0 | 0 | 0 | 0 | 0 | 2448 | 11167 | 0 | 0 | **13615** |
| **CC** | 0 | 0 | 0 | 0 | 0 | 0 | 11167 | 2188 | 0 | **13355** |
| **C** | 0 | 0 | 0 | 0 | 0 | 0 | 16750 | 2188 | 0 | **18938** |
| **Total** | 0 | 0 | 0 | 17121 | 28020 | 41618 | 39083 | 4376 | 0 | **130218** |

Source: Joint Committee calculations based on CEREP and Scope data

Figure 13 reflects the estimation of the hypothetical credit rating distribution for the population of scored items available in 2007 (see Figure 12). In order to derive the number of scorings that would fall in each rating category, the relationship described in Figure 6 between the rating and scoring measures has been used. For example, 75%% and 25%% of the 17121 BBB-scored items would have been (hypothetically) assigned to the BBB and BB rating categories respectively. These ratios correspond to the share of BBB-scored items that have been rated as BBB and BB by Scope between 2012 and 2014 (9 were rated as BBB and 3 were rated as BB).

Figure 13: Distribution of hypothetical credit ratings by observation date and hypothesis testing of benchmark long run default rates

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Hypothetical credit rating Scope** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** | **CC** | **C** | **Benchmark-implied default rate** | **Observed 3-year default rate** |
| **Date** |  |  |  |  |  |  |  |  |  |  |  |
| **2007** | 0 | 0 | 0 | 12841 | 26833 | 44637 | 13615 | 13355 | 18938 | **20.49%** |  |
| **2008** | 0 | 0 | 0 | 13415 | 28361 | 47327 | 14870 | 14859 | 20996 | **20.72%** |  |
| **2009** | 0 | 0 | 0 | 13820 | 28678 | 48101 | 15845 | 16357 | 22959 | **21.04%** | **3.67%** |
| **2010** |  |  |  | 14086 | 29593 | 48587 | 16000 | 16718 | 23389 | **21.00%** | **7.96%** |
| **Total** | 0 | 0 | 0 | 54162 | 113465 | 188653 | 60331 | 61289 | 86282 | **20.82%** |  |
| **Total (2009-2010)** | 0 | 0 | 0 | 27906 | 58272 | 96688 | 31846 | 33076 | 46348 | **21.02%** | **5.85%** |

Source: Joint Committee calculations based on CEREP and Scope data

The rows in the first columns show the result of the process described in Figure 13 for each available period (e.g. row 2007 reflects the (hypothetical) rating distribution calculated in the last column of Figure 13). The aggregate result is shown in the last row. The column ‘**Benchmark-implied default rate**’ reflects the estimated default rate of the scoring pool under the assumption that the default rate of the rating categories is equal to the long run default rate benchmarks (0.10%, 0.10%, 0.25%, 1.00%, 7.50%, 20.00% and 34.00% respectively). The column ‘**Observed 3-year default rate**’ reflects the actually observed 3-year default rate of the scoring population in each date of the period 2007 to 2010.

Figure 14: Distribution of hypothetical credit ratings by scoring category and hypothesis testing of benchmark long run default rates (2009-2010)

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Hypothetical credit rating Scope** | **AAA** | **AA** | **A** | **BBB** | **BB** | **B** | **CCC** | **Benchmark-implied default rate** | **Observed 3-year default rate** |
| **Credit scoring SCOPE** |  |  |  |  |  |  |  |  |  |
| **AAA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0.00% |
| **AA** | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 1.77% |
| **A** | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 1.89% |
| **BBB** | 0 | 0 | 0 | 27906 | 9302 | 0 | 0 | 2.63% | 2.14% |
| **BB** | 0 | 0 | 0 | 0 | 48970 | 11871 | 0 | 9.94% | 2.83% |
| **B** | 0 | 0 | 0 | 0 | 0 | 84817 | 5301 | 20.82% | 4.03% |
| **CCC** | 0 | 0 | 0 | 0 | 0 | 0 | 26545 | 34.00% | 7.79% |
| **CC** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 34.00% | 12.82% |
| **C** | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 15.67% |
| **Total** | 0 | 0 | 0 | 27906 | 58272 | 96688 | 31846 | **21.02%** | **5.85%** |

Source: Joint Committee calculations based on CEREP and Scope data

The first columns display the distribution of (hypothetical) credit ratings by scoring category. The aggregate result is shown in the last row.

The column ‘**Benchmark-implied default rate**’ reflects the estimated default rate of the scoring pool under the assumption that the default rate of the rating categories is equal to the long run default rate benchmarks (0.10%, 0.10%, 0.25%, 1.00%, 7.50%, 20.00% and 34.00% respectively). The column ‘**Observed 3-year default rate**’ reflects the actually observed 3-year default rate of the scoring population in each scoring category (during 2009-2010)

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Appendix 6: Mappings of each rating scale

Figure 15: Mapping of Scope’s Global long-term rating scale

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Credit assessment** | **Initial mapping *based on LR DR* (CQS)** | **Review *based on SR DR* (CQS)** | **Final review *based on qualitative factors* (CQS)** | **Main reason for the mapping** |
| **AAA** | 1 | n.a. | **1** | The quantitative factors are representative of the final CQS. |
| **AA** | 1 | n.a. | **1** |
| **A** | 2 | n.a. | **2** | The quantitative factors are representative of the final CQS. |
| **BBB** | 3 | n.a. | **3** | The quantitative factors are representative of the final CQS. |
| **BB** | 4 | n.a. | **4** | The quantitative factors are representative of the final CQS. |
| **B** | 5 | n.a. | **5** | The quantitative factors are representative of the final CQS. |
| **CCC** | 6 | n.a. | **6** | The quantitative factors are representative of the final CQS. |
| **CC** | 6 | n.a. | **6** |
| **C** | 6 | n.a. | **6** |
| **D** | n.a. | n.a. | **6** | The meaning and relative position of the rating category is representative of the final CQS. |

Figure 16: Mapping of Scope’s Global short-term rating scale

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Credit assessment** | **Corresponding Global long-term rating scale assessment (assessed by JC)** | **Range of CQS of corresponding to Global long-term rating** | **Final review *based on qualitative factors* (CQS)** | **Main reason for the mapping** |
| **S-1+** | AAA/ A+ | 1-2 | **1** | The final CQS has been determined based on the most frequent step associated with the corresponding long-term rating category. |
| **S-1** | AA- / A- | 1-2 | **2** |
| **S-2** | A / BBB- | 2- 3 | **3** |
| **S-3** | BBB / BB- | 3 - 4 | **4** |
| **S-4** | BB / C | 4 - 6 | **4** |

1. According to Article 136(1), the ‘mapping’ is the correspondence between the credit assessments of and ECAI and the credit quality steps set out in Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR). [↑](#footnote-ref-2)
2. In this regard please consider http://www.esma.europa.eu/system/files/esma\_\_2015-1473\_report\_on\_the\_possibility\_of\_establishing\_one\_or\_more\_mapping....pdf. [↑](#footnote-ref-3)
3. It is important to note that the mapping does not contain any assessment of the registration process of Scope carried out by ESMA. [↑](#footnote-ref-4)
4. CEREP is the central repository owned by ESMA to which all registered/certified CRAs have to report their credit assessments. http://cerep.esma.europa.eu/cerep-web/. [↑](#footnote-ref-5)
5. As explained in recital 4 ITS, Article 4(1) CRA allows the use of the credit assessments for the determination of the risk-weighted exposure amounts as specified in Article 113(1) CRR as long as they meet the definition of credit rating in Article 3(1)(a) CRA. [↑](#footnote-ref-6)
6. The default behavior of a rating category is considered to be properly tested if the quantitative factors for that rating category are calculated under Articles 3 – 5 ITS. [↑](#footnote-ref-7)
7. In this context we are not assessing long run default rates as specified in Article 1 of the ITS. Instead we are deriving proxy long run default rates through the usage of a different measure of creditworthiness. [↑](#footnote-ref-8)
8. Default rates have been calculated according to the requirements set out in Article 4 ITS. [↑](#footnote-ref-9)
9. This assessment takes into account point (a) Article 138 CRR, according to which “an institution which decides to use the credit assessments produced by an ECAI for a certain class of items shall use those credit assessments consistently for all exposures belonging to that class”. Therefore, given that SCOPE only rates firms which belong to the exposure class ‘Corporates’ it could be argued that the mapping is sufficiently conservative, at least, on a portfolio basis. [↑](#footnote-ref-10)