

FTSE Russell client consultation on LIBOR and EONIA replacement

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Introduction

The Financial Stability Board (FSB) is leading the reforms for major interest rate benchmarks and to reduce reliance on inter-bank offered rates (IBORs).

The volumes in the underlying IBORs have been decreasing since 2008 and the measure is no longer liquid. There also have been controversies/concerns about the reliability and robustness of these rates.

The UK's Financial Conduct Authority (FCA) has said that it will no longer persuade or compel banks to make London Inter-Bank Offered Rate (LIBOR) submissions after the end of 2021 and market participants should not rely on its continued availability beyond that date.

FTSE Russell has live index products that use the overnight and term IBORs that could be directly impacted by interest rate benchmark reform.

Given the above FTSE Russell will like to set out a transition roadmap for LIBOR and EONIA. In this respect we invite market participant and index users' views for the transition away from these rates to alternative overnight and term rates.

Responding to the consultation

The proposals set out in this consultation document are included in order to gather feedback and may or may not result in changes to our indexes or data solutions.

Index users and other stakeholders are invited to respond by 30 June 2020. The responses will be reviewed by the FTSE Russell Product Governance Board and an update on FTSE Russell's proposed approach will be communicated.

Please submit your response to the questions included in this consultation online at https://www.surveymonkey.co.uk/r/T9JYTBZ

All responses will be treated as confidential. FTSE Russell may publish a summary of the consultation results, but no individual responses will be published and no respondents will be named.

If you have any questions about this survey, or if you encounter any technical issues, please contact rpawson@ftserusssell.com.



Interest rates to consider

FTSE Russell intends to consult on the rates listed below in table 1

Table 1

Category	Issue
LIBOR	Term LIBOR rates are used to apply a liquidity spread – the difference between the 12 month LIBOR and the 12 month OIS rate – in FTSE Russell's leveraged indexes Term LIBOR rates may no longer be available after the end of 2021
EONIA	From 2 nd October 2019, EONIA was defined as €STR + 8.5 bps. EONIA will be discontinued after the end of 2021



Transition consultation questions

1.	In order to reflect the wider spreads between the interbank and the swap market rates post June 2007, a liquidity spread (difference between the twelve month interbank interest rate and the 12 month overnight indexed swap rate), was introduced in the FTSE Russell leveraged indexes. Do you believe that the liquidity spread is still relevant?
	☐ Yes
	□ No
	Please enter your comments here:
2.	If you answered "Yes" to Question 1, what alternative rates (or methodologies) should LIBOR be replaced with given that no successor rates have yet been formally announced (or a methodology yet defined)?
	Please enter your comments here:
3.	If you answered "Yes" to Question 1, what approximate timelines would be appropriate for the transition within FTSE Russell indexes?
	Q4 2020



□ Q1 2021
□ Q2 2021
Q3 2021
Other – please comment below
If you answered "No" to Question 1, what approximate timelines would be appropriate for excluding the liquidity spread from the leveraged indexes?
□ Q4 2020
□ Q1 2021
□ Q2 2021
□ Q3 2021
☐ Other – please comment below

4.



5.	After the end of 2021 should FTSE Russell continue with EONIA being calculated according to the current methodology of €STR + 8.5 bps? Note: major central counterparties have set the discounting switch date on or around 22 June 2020.
	Yes
	□ No
	Please enter your comments here:
6.	If you answered "No" to Question 5, what approximate timelines would be appropriate for the replacement with €STR?
	Q4 2020
	□ Q1 2021
	□ Q2 2021
	□ Q3 2021
	☐ Other – please comment below



7.	Please provide any additional comments				
	Please enter your comments here:				
V	our details				
_	Our details				
	this section we will like to know a bit more about your firm and the way in which you use the FTSE Russell ort and leveraged indexes.				
All	responses will be treated as confidential.				
8.	Please enter your details below				
	Company name:				
	Your name:				
	Email address:				
	Job title:				
	City:				
	Country:				
•	Decree FTOE Decree 1 to 1				
9.	Do you use FTSE Russell indexes or data in your investment process?				
	☐ Yes				
	□ No				
	☐ Don't know				
	□ N/A				



How do you use FTSE Russell indexes? Please select all that apply

Issuance of financial instruments referencing an index	
Determination of amounts payable under a financial instrument or financial contract referencing an index	
Being party to a financial contract referencing an index	
Providing a borrowing rate calculated as a spread/mark-up over an index	
Determining performance of an investment fund using an index for the purpose of tracking the return of such fund, defining asset allocation or computing performance fees	
Other (please specify)	

11. Which of the following best describes your business sector?

Academic	
Asset manager (predominantly active)	
Asset manager (predominantly passive)	
Asset owner	
Corporate advisory/consultant	
ETF/ETP	
Investment consultant	
Sell-side broker	
Other (please specify)	

12. Which of the following best describes your role?

Portfolio Management: Run a portfolio or supports the portfolio manager	
Product/Research: Conduct research or manages/develops product	
Manager Research: Select and evaluates managers	
Consultant to institutional clients	
Marketing/Attribution: Use Index data for marketing purposes or attribution analysis	
Risk Management: Analyse and manages market exposures and risks	
Data Redistribution: Distribute index data to clients	
Market Data: Purchase index data, not a direct user	
Trading	
Compliance	
Lending	
Stewardship	
Other (please specify)	



- 13. Please indicate which FTSE Russell short and leveraged indexes you use. Please use the table in the Appendix to record your answers.
- 14. AUM specific to the FTSE Russell short and leveraged indexes. Please use the table in the Appendix to record your answers.



Appendix

List of short and leveraged indices

Index Code	Index Name	Index Type	Used ?	AUM (USD millions)
FMIBI1X	FTSE MIB Daily Short Strategy RT Gross TR Index	Short		
FMIBI2X	FTSE MIB Daily Super Short Strategy RT Gross TR Index	Short		
FMIBI3X	FTSE MIB Daily Ultra Short Strategy RT Gross TR Index	Short		
FMIBI5X	x5 Daily Short Strategy FTSE MIB RT Gross TR Index	Short		
FMIBL2X	FTSE MIB Daily Leveraged RT Net-of-Tax (Lux) TR Index	Leveraged		
FMIBL3X	FTSE MIB Daily Super Leveraged RT Net-of-Tax (Lux) TR Index	Leveraged		
FMIBL4X	FTSE MIB Daily Ultra Leveraged RT Net-of-Tax (Lux) TR Index	Leveraged		
FMIBL5X	x5 Daily Leveraged FTSE MIB Daily RT Net-of-Tax (Lux) TR Index	Leveraged		
UKXI1X	FTSE 100 Daily Short Strategy RT Gross TR Index	Short		
JKXI2X	FTSE 100 Daily Super Short Strategy RT Gross TR Index	Short		
JKXI3X	FTSE 100 Daily Ultra Short Strategy RT Gross TR Index	Short		
JKXI5X	x5 Daily Short Strategy FTSE 100 RT Gross TR Index	Short		
JKXL2X	FTSE 100 Daily Leveraged RT TR Index	Leveraged		
JKXL3X	FTSE 100 Daily Super Leveraged RT TR Index	Leveraged		
JKXL4X	FTSE 100 Daily Ultra Leveraged RT TR Index	Leveraged		
JKXL5X	x5 Daily Leveraged FTSE 100 RT TR Index	Leveraged		
MCXI1X	FTSE 250 Daily Short Strategy RT Gross TR Index	Short		



MCXI2X	FTSE 250 Daily Super Short Strategy RT Gross TR Index	Short	
MCXI3X	FTSE 250 Daily Ultra Short Strategy RT Gross TR Index	Short	
MCXL2X	FTSE 250 Daily Leveraged RT TR Index	Leveraged	
MCXL3X	FTSE 250 Daily Super Leveraged RT TR Index	Leveraged	
MCXL4X	FTSE 250 Daily Ultra Leveraged RT TR Index	Leveraged	
SLQUSS1	FTSE USA Large Cap Super Liquid Daily Short Index	Short	
SLQUSS2	FTSE USA Large Cap Super Liquid 2x Daily Short Index	Short	
SLQUSS3	FTSE USA Large Cap Super Liquid 3x Daily Short Index	Short	
SLQUSL2	FTSE USA Large Cap Super Liquid 2x Daily Leveraged Index	Leveraged	
SLQUSL3	FTSE USA Large Cap Super Liquid 3x Daily Leveraged Index	Leveraged	
SLQUSL4	FTSE USA Large Cap Super Liquid 4x Daily Leveraged Index	Leveraged	
SLQUKMS1	FTSE UK Mid Cap Super Liquid Daily Short Index	Short	
SLQUKMS2	FTSE UK Mid Cap Super Liquid 2x Daily Short Index	Short	
SLQUKMS3	FTSE UK Mid Cap Super Liquid 3x Daily Short Index	Short	
SLQUKML2	FTSE UK Mid Cap Super Liquid 2x Daily Leveraged Index	Leveraged	
SLQUKML3	FTSE UK Mid Cap Super Liquid 3x Daily Leveraged Index	Leveraged	
SLQUKML4	FTSE UK Mid Cap Super Liquid 4x Daily Leveraged Index	Leveraged	
SLQJPLS1	FTSE Japan Large Cap Super Liquid Daily Short Index	Short	
SLQJPLS2	FTSE Japan Large Cap Super Liquid 2x Daily Short Index	Short	



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SLQJPLS3	FTSE Japan Large Cap Super Liquid 3x Daily Short Index	Short	
SLQJPLL2	FTSE Japan Large Cap Super Liquid 2x Daily Leveraged Index	Leveraged	
SLQJPLL3	FTSE Japan Large Cap Super Liquid 3x Daily Leveraged Index	Leveraged	
SLQSPS1X	FTSE Spain Super Liquid Daily Short Index	Short	
SLQSPS2X	FTSE Spain Super Liquid 2x Daily Short Index	Short	
SLQSPS3X	FTSE Spain Super Liquid 3x Daily Short Index	Short	
SLQSPL2X	FTSE Spain Super Liquid 2x Daily Leveraged Index	Leveraged	
SLQSPL3X	FTSE Spain Super Liquid 3x Daily Leveraged Index	Leveraged	
FMIBI1	FTSE MIB Short Strategy Index	Short	
FMIBI2	FTSE MIB Daily Super Short Strategy Index	Short	
FMIBL2	FTSE MIB Daily Leveraged Index	Leveraged	
UKXI2	FTSE 100 Daily Super Short Strategy Index	Short	
UKXL2	FTSE 100 Daily Leveraged Index	Leveraged	
BRICUS1X	FTSE BRIC 50 Daily Short Index	Short	
BRICUS2X	FTSE BRIC 50 2x Daily Short Index	Short	
BRICUS3X	FTSE BRIC 50 3x Daily Short Index	Short	
BRICUL2X	FTSE BRIC 50 2x Daily Leveraged Index	Leveraged	
BRICUL3X	FTSE BRIC 50 3x Daily Leveraged Index	Leveraged	
UKXS	FTSE 100 Short Index	Short	
DXNAL1QX	FTSE Developed Ex NA 1.25x Daily Leveraged No Spread Index	Leveraged	
FTEML1QX	FTSE Emerging 1.25x Daily Leveraged No Spread Index	Leveraged	
USCSLS1X	FTSE USA Small Cap Super Liquid Daily Short Index	Short	



USCSLS2X	FTSE USA Small Cap Super Liquid 2x Daily Short Index	Short	
USCSLS3X	FTSE USA Small Cap Super Liquid 3x Daily Short Index	Short	
USCSLL2X	FTSE USA Small Cap Super Liquid 2x Daily Leveraged Index	Leveraged	
USCSLL3X	FTSE USA Small Cap Super Liquid 3x Daily Leveraged Index	Leveraged	
XINOUS1X	FTSE China 50 Daily Short Index	Short	
XINOUS2X	FTSE China 50 2x Daily Short Index	Short	
XIN0US3X	FTSE China 50 3x Daily Short Index	Short	
XIN0UL2X	FTSE China 50 2x Daily Leveraged Index	Leveraged	
XIN0UL3X	FTSE China 50 3x Daily Leveraged Index	Leveraged	
WIJPNS1X	FTSE Japan Daily Short Index	Short	
WIJPNS2X	FTSE Japan 2x Daily Short Index	Short	
WIJPNS3X	FTSE Japan 3x Daily Short Index	Short	
WIJPNL2X	FTSE Japan 2x Daily Leveraged Index	Leveraged	
WIJPNL3X	FTSE Japan 3x Daily Leveraged Index	Leveraged	
FCNACS1X	FTSE N Share Daily Short Index	Short	
FCNACS2X	FTSE N Share 2x Daily Short Index	Short	
FCNACS3X	FTSE N Share 3x Daily Short Index	Short	
FCNACL2X	FTSE N Share 2x Daily Leveraged Index	Leveraged	
FCNACL3X	FTSE N Share 3x Daily Leveraged Index	Leveraged	
FTGMIS1X	FTSE Gold Mines Daily Short Index	Short	
FTGMIS2X	FTSE Gold Mines 2x Daily Short Index	Short	
FTGMIS3X	FTSE Gold Mines 3x Daily Short Index	Short	
FTGMIL2X	FTSE Gold Mines 2x Daily Leveraged Index	Leveraged	



FTGMIL3X	FTSE Gold Mines 3x Daily Leveraged Index	Leveraged	
FTSTIS1X	STI Daily Short Index	Short	
FTSTIS2X	STI 2x Daily Short Index	Short	
FTSTIS3X	STI 3x Daily Short Index	Short	
FTSTIL2X	STI 2x Daily Leverage Index	Leveraged	
FTSTIL3X	STI 3x Daily Leverage Index	Leveraged	
EMNLL1QX	FTSE Emerging Net Tax (US RIC) 1.25x Daily Leveraged No Spread LIBOR Index	Leveraged	
DXUSL1QX	FTSE Developed ex US All Cap Net Tax (US RIC) 1.25x Daily Leveraged No Spread Index	Leveraged	
XUSLL1QX	FTSE Developed ex US All Cap Net Tax (US RIC) 1.25x Daily Leveraged No Spread LIBOR Index	Leveraged	
FTKLPL2X	FTSE Bursa Malaysia KLCI 2x Daily Leveraged (Price) Index	Leveraged	
FTKLPS1X	FTSE Bursa Malaysia KLCI Daily Short (Price) Index	Short	
R2000S1X	Russell 2000 Daily Short Index	Short	
R2000S2X	Russell 2000 2x Daily Short Index	Short	
R2000L2X	Russell 2000 2x Daily Leveraged Index	Leveraged	
UKXDL2X	FTSE 100 2x Daily Leveraged (Declared Dividend) Index	Leveraged	



For more information about our indexes, please visit ftserussell.com.

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