

Fact Sheet

IBOR Fallbacks

Over the next several years, LIBOR, and potentially various other interbank offered rates ('IBORs'), will be discontinued. On March 05, 2021 the Financial Conduct Authority and the LIBOR Administrator announced that LIBOR will permanently cease to be published or become non-representative for all but specific USD LIBOR tenors from the first London Banking Day on or after January 01, 2022 and will cease to be published or become non-representative for all other USD LIBOR tenors from the first London Banking Day on or after July 1, 2023. Further details can be found here¹.

To address the risk that counterparties may have exposure to a discontinued IBOR (or a non-representative LIBOR), they are encouraged to agree to contractual fallback provisions that would provide for adjusted versions of the risk-free reference rates ('RFRs') as replacement rates.

Given that the RFRs are inherently different from the IBORs, the International Swaps & Derivatives Association, Inc. ('ISDA') is implementing prescribed adjustments to the RFRs to serve as IBOR fallbacks based on feedback received from several market consultations regarding these inherent differences. ISDA selected Bloomberg Index Services Limited as the official adjustment services vendor in connection with these fallbacks. This factsheet provides an overview of the methodology and implementation of IBOR fallback rate calculations. From the announcement², July 31, 2019

"Given the uncertainty about the long-term viability of certain interbank offered rates (IBORs), it is vital that robust fallbacks are included within derivatives contracts. It is also important these fallback rates are independently calculated and widely available across the market. This will dramatically reduce the systemic threat of a permanent discontinuation of LIBOR and other IBORs," says **Scott O'Malia, ISDA's Chief Executive**.

"The publication of robust fallback rates for derivatives referencing key IBORs and the addition of new fallbacks to ISDA's standard documentation reflects four years of work by ISDA, market participants, regulators and infrastructure providers. This is a major step forward in reducing the risks associated with an IBOR discontinuation, and now work can turn to educating the market on how precisely the fallbacks will function," says **Ann Battle, ISDA's Head of Benchmark Reform**.

"Calculating and distributing IBOR fallbacks fits naturally with Bloomberg Index Services Limited's (BISL's) business model. It complements Bloomberg's capabilities and our ongoing efforts to support investors as they prepare for the transition away from LIBOR," says **Steve Berkley, BISL's Chief Executive**.

"ISDA's work on updating the fallbacks for key IBORs has been vital in order to smooth the market impact of IBOR cessation. The creation and documentation of robust fallbacks has been complex and we've been pleased to work with ISDA, Bloomberg and market participants to help deliver this solution to the market," says **Deepak Sitlani, Partner at Linklaters**.

¹ <https://www.isda.org/2021/03/05/isda-guidance-uk-fca-announcement-on-the-libor-benchmarks/>

² <https://www.isda.org/2019/07/31/bloomberg-selected-as-fallback-adjustment-vendor/>

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Background

Current Market Gap

- \$350tn+ in various financial instruments reference LIBOR, which will start to cease after the end of 2021 and may be followed by the demise of other IBORs
- Public/private sector working groups globally identified alternative RFRs as possible alternatives and fallbacks for IBORs (such as SONIA for GBP LIBOR)
- Adoption of these alternatives is a significant undertaking, particularly as they are inherently different from the IBORs:
 - These rates lack term structures similar to IBORs (e.g. 1-week, 3-month, etc.)
 - These rates have different behavioral characteristics to IBORs resulting in different historical spreads

Addressing the Market Gap

- ISDA has implemented fallbacks based on the RFRs for LIBOR and the other key IBORs in its standard definitions and held several market consultations to address these differences in the event the fallbacks are triggered and the fallback rates apply
- ISDA selected Bloomberg Index Services Limited ('BISL') as the official adjustment services vendor to calculate these various IBOR fallbacks

Product Offering

- Calculations published are:
 - *Adjusted RFR*: compounded setting in arrears RFR for each relevant term - daily compounding of RFRs (e.g. SOFR, SONIA)
 - *Spread Adjustment*: median of the historical differences between the IBOR for each tenor and the compounded RFR for that tenor over a five-year period prior to an announcement constituting a Trigger Event (as defined below)
 - *Fallback Rate*: The 'all in' fallback rate, which is the combination of the Adjusted RFR and the Spread Adjustment for each relevant tenor
- 11 Fallback Rates are published by BISL for each IBOR and Tenor below:

○ AUD BBSW	1M, 2M, 3M, 4M, 5M, 6M
○ CAD CDOR	1M, 2M, 3M, 6M, 12M
○ CHF LIBOR	S/N, 1W, 1M, 2M, 3M, 6M, 12M
○ EUR EURIBOR	1W, 1M, 3M, 6M, 12M
○ EUR LIBOR	O/N, 1W, 1M, 2M, 3M, 6M, 12M
○ GBP LIBOR	O/N, 1W, 1M, 2M, 3M, 6M, 12M
○ HKD HIBOR	O/N, 1W, 2W, 1M, 2M, 3M, 6M, 12M
○ JPY Euroyen TIBOR	1W, 1M, 3M, 6M, 12M
○ JPY LIBOR	S/N, 1W, 1M, 2M, 3M, 6M, 12M
○ JPY TIBOR	1W, 1M, 3M, 6M, 12M
○ USD LIBOR	O/N, 1W, 1M, 2M, 3M, 6M, 12M

Given different time zones of the underlying data, Fallback Rates are published periodically throughout the day. 'IBOR' and 'Tenor' are defined in the *IBOR Fallback Rate Adjustments Rule Book*.

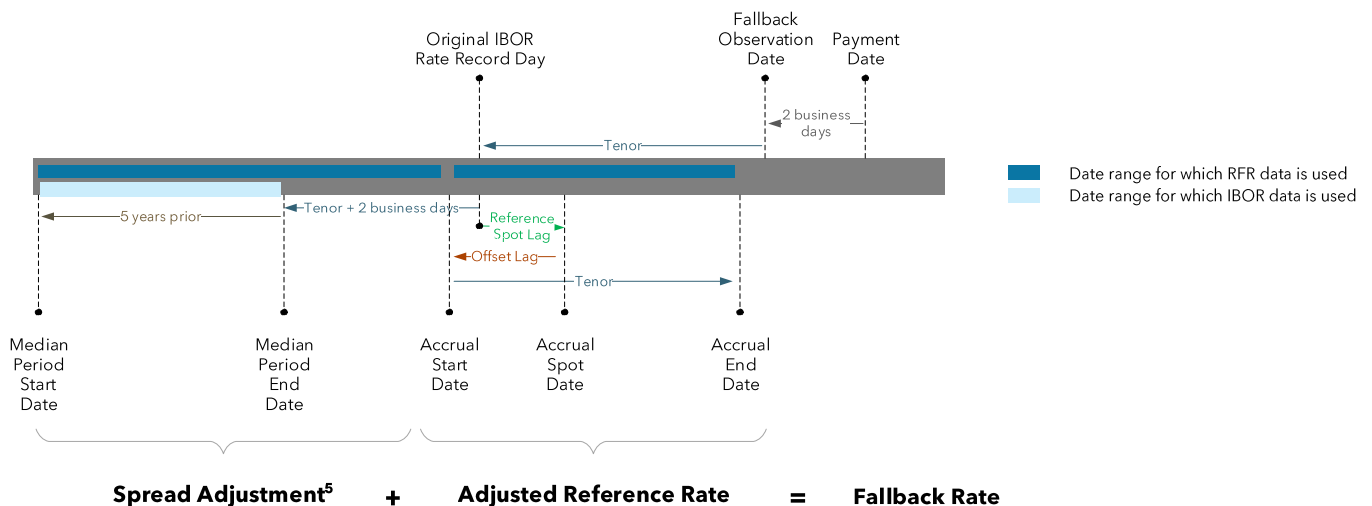
Overview of IBOR Fallbacks Methodology and 2006 ISDA Definitions³

Below is an overview of key terms associated with the IBOR fallbacks methodology and the 2006 ISDA Definitions.

Adjusted RFR⁴	To determine the Adjusted RFR, the underlying RFR is compounded over an accrual period corresponding to the tenor of the IBOR. The start of the accrual period is determined firstly by following the market convention Reference Spot Lag, and then applying a two Reference Rate business day backward shift, or Offset Lag. The compounded rate is annualized, and the day count convention adjusted to match that of the IBOR.
Spread Adjustment⁴	If the Original IBOR Rate Record Day (defined below under 'Fallback Rate') is prior to the Spread Adjustment Fixing Date (defined below), the Spread Adjustment is the median spread between the IBOR and the Adjusted RFR over the preceding five-year period (from the Median Period Start Date to the Median Period End Date, as each is defined below). The Spread Adjustment is fixed effective the Spread Adjustment Fixing Date (for a given IBOR and Tenor), which is the earlier of: (i) the IBOR Cessation Trigger Date (or 'Index Cessation Event' under the updated 2006 ISDA Definitions) for all Tenors of the relevant IBOR; and (ii) the first date on or after the Tenor Cessation Trigger Date for a particular Tenor of the relevant IBOR for which there has been an announcement of cessation (or, in the case of LIBOR, non-representativeness) for all shorter Tenors and/or all longer Tenors.
Fallback Rate	The Fallback Rates each correspond to an 'Original IBOR Rate Record Day', which is the date that the relevant IBOR would have appeared on the screen. For certain IBORs (e.g. GBP LIBOR), this is the Reset Date under the 2006 ISDA Definitions, while for other IBORs (e.g. USD LIBOR), it is two banking days prior to such Reset Date. Note that, for the purpose of calculating a continuous data series, Fallback Rates are also published for 'Original IBOR Rate Record Days' that are non-business day weekdays, even though those dates would not have had IBOR rates published. Fallback Rate = Adjusted Reference Rate + Spread Adjustment.
2006 ISDA Definitions^{4a}	On or after the Index Cessation Effective Date under the updated 2006 ISDA Definitions, one needs to look up the Fallback Rate for a given IBOR and Tenor that corresponds to the Original IBOR Rate Record Day. One looks up this Fallback Rate two payment business days prior to the Payment Date for the relevant transaction (the 'Fallback Observation Date'). If the Fallback Rate for the Original IBOR Rate Record Day is available by the cut off time on the Fallback Observation Date, one should use that. If it is not available, one should use the Fallback Rate that has been published for the most recent Original IBOR Rate Record Day (as at the cut off time on the Fallback Observation Date).

Figure 1

Interplay of the key dates associated with the IBOR Fallbacks Rule Book and 2006 ISDA Definitions³



³ Please refer to the *IBOR Fallback Rate Adjustments Rule Book* and the 2006 ISDA Definitions for additional details.

⁴ Capitalized terms used in this row and not otherwise defined in this document have the meaning given to them in the *IBOR Fallback Rate Adjustments Rule Book*.

^{4a} Capitalized terms used in this row and not otherwise defined in this document have the meaning given to them in the 2006 ISDA Definitions.

⁵ Please note that as of the Spread Adjustment Fixing Date, this is fixed and will not change. Therefore, the period between the time period for calculating the Spread Adjustment and the time period for calculating the Adjusted RFR will continuously lengthen. Please also note that Figure 1 assumes that the Spread Adjustment Fixing Date has not yet occurred or occurs on the same day as the Original IBOR Rate Record Day.

Publication Schedule

The determination of dates used in the calculation is based on the relevant calendars and exchange schedules. The dates for which Fallback Rates will or will not be published are set out in the *IBOR Fallback Rate Adjustments Rule Book* (the 'Rule Book'), which is available on ISDA <GO> on the Bloomberg Terminal® and Bloomberg's LIBOR Transition website, as well as ISDA's Benchmark Reform and Transition from LIBOR page.

Interpolation Associated with the Spread Adjustment

If the publication of one or more Tenors of an IBOR is discontinued, or, in the case of LIBOR, if such Tenors become non-representative, prior to the complete cessation (or, in the case of LIBOR, non-representativeness) of the IBOR, then the Spread Adjustment will continue to be calculated for the Tenors that continue to be published (and, in the case of LIBOR, are not non-representative) and those Tenors where at least one shorter and at least one longer Tenor are still available (and, in the case of LIBOR, not non-representative). In these latter cases, the values for the discontinued (or, in the case of LIBOR, non-representative) Tenor in the spread calculation shall be determined using linear interpolation between the closest shorter and closest longer available Tenors (which, in the case of LIBOR, are not non-representative). Upon a Spread Adjustment Fixing Date for the Tenor that had been discontinued (or, in the case of LIBOR, was non-representative), the calculation of the Spread Adjustment will include as data points the interpolated IBOR rates that were calculated during the relevant portion of the historical period.

As discussed in the 'Discontinued Rates Maturities Provisions' section below, these interpolation mechanisms are consistent with the interpolation that will apply contractually if certain but not all Tenors of an IBOR are discontinued (or, in the case of LIBOR, become non-representative) prior to the cessation (or, in the case of LIBOR, non-representativeness) of the IBOR.

Additional details associated with the calculation of the Fallback Rates can be found in the Rule Book. For further understanding, a Sample Calculation is provided in Appendix 1.

Trigger Events for Fallback Rates

The fallbacks in the 2006 ISDA Definitions will be triggered upon the following Trigger Events (which are called 'Index Cessation Events' in the 2006 ISDA Definitions):

- A public statement or publication of information by or on behalf of the administrator of the Applicable Rate announcing that it has ceased or will cease to provide the Applicable Rate permanently or indefinitely, provided that, at the time of the statement or publication, there is no successor administrator that will continue to provide the Applicable Rate;
- A public statement or publication of information by the regulatory supervisor for the administrator of the Applicable Rate, the central bank for the currency of the Applicable Rate, an insolvency official with jurisdiction over the administrator for the Applicable Rate, a resolution authority with jurisdiction over the administrator for the Applicable Rate or a court or an entity with similar insolvency or resolution authority over the administrator for the Applicable Rate, which states that the administrator of the Applicable Rate has ceased or will cease to provide the Applicable Rate permanently or indefinitely, provided that, at the time of the statement or publication, there is no successor administrator that will continue to provide the Applicable Rate; or

- If the Applicable Rate is Sterling LIBOR, Swiss Franc LIBOR, U.S. Dollar LIBOR, Euro LIBOR or Yen LIBOR only, a public statement or publication of information by the regulatory supervisor for the administrator of such Applicable Rate announcing that (A) the regulatory supervisor has determined that such Applicable Rate is no longer, or as of a specified future date will no longer be, representative of the underlying market and economic reality that such Applicable Rate is intended to measure and that representativeness will not be restored and (B) it is being made in the awareness that the statement or publication will engage certain contractual triggers for fallbacks activated by pre-cessation announcements by such supervisor (howsoever described) in contracts.

The first two bullet points above relate to permanent cessation, and the third bullet point above is the 'pre-cessation' trigger.

These Trigger Events are relevant to the calculation of the Spread Adjustment because they determine the Spread Adjustment Fixing Date. However, importantly, in connection with the permanent cessation fallbacks or pre-cessation fallbacks (in the case of LIBOR), the Fallback Rates will not apply until the actual cessation of the relevant IBOR (or the cessation of the relevant Tenor and all shorter or all longer Tenors) or actual non-representativeness of LIBOR (or the non-representativeness (in the case of LIBOR) of the relevant Tenor and all shorter or all longer Tenors).

In the case of LIBOR, the Spread Adjustments were fixed for all currencies and tenors as of March 05, 2021. A Technical Note explaining this and detailing the fixed Spread Adjustments can be found here.⁶

ISDA Definitions - update to the 2006 ISDA Definitions for 'Rate Options'

ISDA amended various 'rate options' in the 2006 ISDA Definitions for the IBOR benchmarks listed above to provide that the Fallback Rates will apply upon the *permanent discontinuation* of those IBORs and, in the case of LIBOR, if LIBOR becomes '*non-representative*'.⁷ ISDA amended the 2006 ISDA Definitions by publishing a 'Supplement' to the 2006 ISDA Definitions. Upon publication of this Supplement, transactions incorporating the 2006 ISDA Definitions that were entered into on or after the date of the Supplement (i.e. the date on which the 2006 ISDA Definitions are amended) include the amended rate option (i.e. the rate option with the provisions contemplating the application of the relevant Fallback Rate).⁸

Transactions entered into prior to the date of the Supplement (so called 'legacy derivative contracts') will continue to be based on the 2006 ISDA Definitions as they applied to the legacy derivative contracts before they were amended pursuant to the Supplement, and therefore will not include the amended rate option with references to the relevant Fallback Rate and related triggers.

ISDA therefore also published a protocol to facilitate the update of rate options in legacy derivative contracts so as to include references to the relevant Fallback Rate and related triggers. By adhering to the protocol, market participants are agreeing that their legacy derivative contracts *with other adherents* will include the amended rate option for the relevant IBOR (or equivalent terms) and will therefore include the references to the relevant Fallback Rate and related triggers. Given that the relevant IBORs are included in a broad range of derivative as well as non-derivative agreements, the

⁶ https://assets.bbhub.io/professional/sites/10/IBOR_Fallbacks_LIBOR_Cessation_Announcement-2021-Mar.pdf

⁷ ISDA also amended certain rate options that use USD LIBOR as an input to include fallbacks that will apply if USD LIBOR is permanently discontinued or is non-representative.

⁸ ISDA recently published the 2021 ISDA Interest Rate Derivatives Definitions. The terms of the Supplement to the 2006 ISDA Definitions that amends the relevant 'rate options' has been translated into the 2021 ISDA Interest Rate Definitions and therefore the substance of the new fallbacks will apply to any transactions that incorporate the 2021 ISDA Interest Rate Derivatives Definitions. The 2021 ISDA Interest Rate Derivatives Definitions are scheduled for implementation over the weekend of October 2-3, 2021, although firms may continue to use the 2006 ISDA Definitions after that date if they choose to. Publication of the 2021 ISDA Interest Rate Derivatives Definitions does not have any effect on transactions that incorporate the 2006 ISDA Definitions, unless parties agree to amend those transactions. More information is available at: <https://www.isda.org/2021/06/14/isda-publishes-first-digital-definitions-for-interest-rate-derivatives/>.

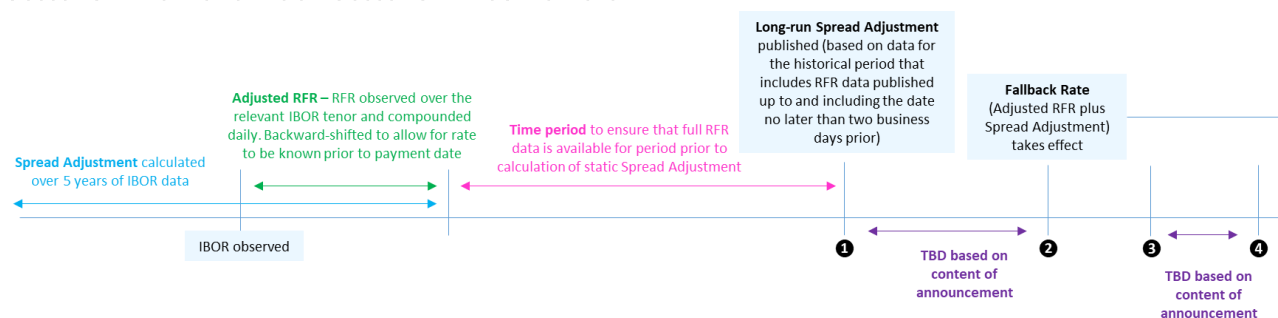
protocol goes beyond merely amending legacy derivative contracts that incorporate the 2006 ISDA Definitions. For example, it covers legacy derivative contracts that incorporate previous iterations of interest rate definitional booklets published by ISDA as well as agreements such as the Global Master Repurchase Agreement.

As always, adherence to the protocol will be completely voluntary and will amend contracts only between two adhering parties (i.e. it will not amend contracts between an adhering party and a non-adhering party or between two non-adhering parties). Counterparties could alternatively agree to include the amended rate options via a bilateral amendment agreement.

Terms of the Amended Rate Options

In the Supplement to the 2006 ISDA Definitions, the Trigger Events are the same as those referenced above but they are called Index Cessation Events. After an announcement constituting an Index Cessation Event is made, the fallback will apply from the related Index Cessation Effective Date. This is the first business day following the date on which the IBOR is permanently discontinued or, in the case of LIBOR, is non-representative. During the period between the Index Cessation Event and the Index Cessation Effective Date (if any), the relevant document will continue to reference the relevant IBOR. Whether any such period exists, and the length of the period, is based on the information in the announcement constituting the Index Cessation Event and therefore will not be known until the time of the Index Cessation Event.

See the diagram below for further information regarding when the fallbacks are calculated and when the fallbacks apply in the case of a permanent cessation or pre-cessation (in the case of LIBOR) Index Cessation Event and Index Cessation Effective Date.



1: pre-cessation Index Cessation Event, i.e. announcement that LIBOR will no longer be representative (as of 2 (which may either coincide with 1 or be after 1))

2: pre-cessation Index Cessation Effective Date, i.e. LIBOR actually is no longer representative

3: permanent cessation Index Cessation Event, i.e. announcement that IBOR will permanently cease to be available

4: permanent cessation Index Cessation Effective Date, i.e. IBOR actually permanently ceases to be available

The Fallback Rate will be the Fallback Rate for the relevant IBOR and Tenor that corresponds to the Original IBOR Rate Record Day, provided that this Fallback Rate appears on the relevant screen at least two Business Days (as defined in the 2006 ISDA Definitions as applicable for the purposes of payment) prior to the relevant Payment Date. The Payment Date will be specified in the contract and will typically be at the end of the relevant Calculation Period (as defined in the 2006 ISDA Definitions). Parties can define the relevant Business Days in the contract so as to ensure that the Fallback Rate will be known two days in advance of the payment being due based on the Business Day calendar in relevant jurisdictions. If the parties do not specify places for the purposes of the reference to Business Days for payment purposes within the contract, then the 2006 ISDA Definitions will implement default Business Day calendars (e.g. London for GBP LIBOR). This means that two transactions which referenced the same IBOR on the same day may apply a different Fallback Rate if different Business Day calendars apply to those transactions.⁹

⁹ If, for each transaction, the Fallback Rate for the Original IBOR Rate Record Day is on the screen two Business Days prior to the Payment Date, the same Fallback Rate would be used in each of those transactions. However, if different Business Day calendars mean that this Fallback Rate is not on the screen by that day for one of those transactions, the two transactions may apply different Fallback Rates.

As mentioned above, each Fallback Rate that is published will be linked to an Original IBOR Rate Record Day. This is the date that the relevant IBOR would have appeared on the screen. For example, in the context of GBP LIBOR this is the Reset Date under the 2006 ISDA Definitions and in the context of USD LIBOR this is two banking days prior to the Reset Date. Note that, for the purpose of calculating a continuous data series, Fallback Rates are also published for 'Original IBOR Rate Record Days' that are non-business day weekdays, even though those dates would not have had IBOR rates published.

If, however, the Fallback Rate for the Original IBOR Rate Record Day corresponding to the Reset Date (or the day two banking days prior to the Reset Date, as applicable) is not produced by Bloomberg two Business Days prior to the Payment Date, then the Fallback Rate that has been published for the most recent Original IBOR Rate Record Day should be used. This will have the effect of applying a dynamic 'backward shift' (i.e. the standard two-day backward shift that applies under the Bloomberg Rule Book for the Fallback Rates will effectively be lengthened in this scenario to the number of days necessary for the Fallback Rate to be known two Business Days prior to the 'Payment Date').

The Supplement to the 2006 ISDA Definitions also includes provisions dealing with a permanent discontinuation of the Fallback Rates and the RFRs themselves. In this scenario, additional fallbacks are specified which are currency-specific. For example, for GBP LIBOR, there is a further fallback based on the Bank of England's bank rate and, for USD LIBOR, there are further fallbacks based on any rate recommended by the Federal Reserve, the Overnight Bank Funding Rate and the FOMC Target Rate.

Discontinued Rates Maturities Provisions

Alongside restating various rate options, the Supplement to the 2006 ISDA Definitions includes a new mechanism to determine a rate if a specific Tenor is discontinued (or, in the case of LIBOR, is 'non-representative') and the provider of that rate continues to publish at least one shorter Tenor and at least one longer Tenor (and, in the case of LIBOR, these Tenors are not 'non-representative'). In this scenario, the relevant rate would be determined by interpolating the nearest remaining shorter rate and the nearest remaining longer rate (assuming, only in the case of LIBOR, that those rates are not 'non-representative').

Fallbacks for Calculation Periods to which 'Linear Interpolation' applies and Calculation Periods which apply a rate with a tenor that is longer than the period

Fallbacks to which 'Linear Interpolation' applies:

The Supplement to the 2006 ISDA Definitions also specifically deals with Calculation Periods to which Linear Interpolation (as such terms are defined in the 2006 ISDA Definitions) is specified to apply. In these cases, the rate for a non-standard period is calculated by reference to two rates with standard Tenors, one of which will often have a Tenor that is longer than the length of the Calculation Period.

If the Fallback Rates apply, however, the Adjusted RFR for the longer Tenor will not be known until the end of that longer Tenor period and so the 'standard' Fallback Rate may not be appropriate in this scenario.

The Supplement to the 2006 ISDA Definitions therefore provides that if Linear Interpolation cannot be used as originally anticipated (for example, if specific Tenors which were to be used have been discontinued) then:

- interpolation of remaining IBOR Tenors (which, in the case of LIBOR, are not 'non-representative') pursuant to the discontinued rates maturities provisions will apply (the discontinued rates maturities provisions apply where an interpolated rate was not originally used but also where a Tenor that was previously used for interpolation has been discontinued or is non-representative in the case of LIBOR); and

- if the only remaining IBOR Tenors (which, in the case of LIBOR, are not 'non-representative') are all shorter or all longer than the Calculation Period, then the Calculation Agent will determine the applicable fallback rate by compounding the RFR over the length of the Calculation Period (backward-shifted by two Business Days) and adding a spread. If the Bloomberg spread for longer and shorter tenors has been fixed (i.e. if the 'Spread Adjustment Fixing Date' has occurred for such tenors) then the fixed spread for the nearest shorter and nearest longer tenor will be interpolated. If the Bloomberg spread has been fixed only for shorter tenors or only for longer tenors, then the fixed spread for the nearest shorter or nearest longer tenor shall be added.

Calculation Periods which apply a rate with a tenor that is longer than the period:

The 'standard' fallbacks will be used for a Calculation Period to which Linear Interpolation is not specified to apply. This means that if (i) an IBOR with a tenor that is longer than the length of the Calculation Period is ordinarily used, (ii) that IBOR tenor is discontinued (or, in the case of LIBOR, is non-representative), (iii) the discontinued rates maturities provisions cannot be applied because there are no other IBOR Tenors remaining (which, in the case of LIBOR, are not 'non-representative') or there are only longer or only shorter IBOR Tenors remaining (which, in the case of LIBOR, are not 'non-representative'), then the parties will use the Fallback Rate on the screen two payment Business Days prior to the Payment Date notwithstanding that this Fallback Rate relates to an earlier Original IBOR Rate Record Day.

Accessing Data

Bloomberg makes the Adjusted RFRs, the Spread Adjustments and the Fallback Rates broadly available to industry participants through:

Bloomberg Terminal, Data License	The data is available to Bloomberg customers through various distribution channels such as the Bloomberg Terminal, the Desktop API and Data License. The latest available data is displayed at <FBAK><GO>. Data for prior days is displayed at <HP><GO>. Separate to this data, Bloomberg Terminal customers already have access to RFRs and compounded RFRs data at <EONC> <GO>. Further information about this, and LIBOR transition more widely, is available at <RFR> <GO>. Please see Appendix 2 for a list of tickers associated with the Adjusted RFRs, the Spread Adjustments and the Fallback Rates.
Authorized Redistributors	The data is available through authorized redistributors.
Bloomberg website	Delayed data is publicly available on Bloomberg's website.

Licensing

A License is required from Bloomberg for the re-distribution or usage of the Adjusted RFRs, the Spread Adjustments and the Fallback Rates. Specifically, use of the fallback rates within ISDA contracts, including swaps and interest rate options, whether cleared or uncleared, requires a usage license. The license also provides for use of Bloomberg's data outside the scope of an ISDA contract, for example, as a fallback in cash instruments such as loans, FRNs and mortgages.

Overview

- Three license types are available
 - Re-distribution License
 - Premium Usage License
 - Firm-wide Usage License
- A Usage License permits firm-wide enterprise usage for multiple purposes. This is a group-wide global license and includes affiliates. There is no 'per user' count and no 'product' count
- Annual Redistribution License fees and Premium Usage License fees, primarily for infrastructure providers (e.g. CCPs, exchanges, benchmark administrators, index services providers, enterprise analytics providers, etc.) apply from the date of subscription
- Annual Usage License fees are waived for all other firms until the earlier of 2022, the 'Index Cessation Effective Date' for an IBOR in accordance with the terms of the updated 2006 ISDA Definitions, or the application of any of the data for the conversion or adjustment of financial products in accordance with the Usage License terms

Additional Details

- Usage License fee waivers continue to apply for smaller institutions with total assets, including assets under management, below USD5bn, who subscribe to use a single rate set (a rate set includes all tenors for a rate)
- Payable from date of subscription
 - Vendor Re-distribution License
 - Realtime & Delayed data: \$50,000
 - Delayed data (24hr): \$10,000
 - Premium Usage License: *(applicable primarily for CCPs, exchanges, 'for-profit' benchmark administrators, index services providers and enterprise analytics providers)*
 - Single rate set: \$50,000
 - Two or more rate sets: \$100,000
- Payable from the date of application of the IBOR fallbacks¹⁰
 - Premium Usage License: *(applicable for government agency / 'not-for-profit' benchmark administrators, for use in benchmarks and derived benchmarks)*
 - Single rate set: \$50,000
 - Two or more rate sets: \$100,000
 - Firm-wide Usage License:
 - Single rate set: \$5,000¹¹
 - Two or more rate sets:
 - Financial Institution: \$20,000
 - Non-financial Institution: \$10,000

¹⁰ If LIBOR and/or other IBORs continue beyond the end of 2021 and the Index Cessation Effective Date for one or more fallbacks has not occurred, Bloomberg reserves the right to apply Usage License fees. Given the LIBOR cessation announcement of March 05, 2021, for the purposes of the Usage License fees, the 'Date of application' for LIBOR fallbacks is January 01, 2022, or if earlier, the date that any of the data is applied in a financial instrument, for example when converting a LIBOR-referenced instrument to an alternative reference rate.

¹¹ Usage License fees are waived for institutions using a single rate set and with assets below \$5bn. The waiver does not apply for Premium Usage Licenses, including for benchmark administrators operating under a Premium Usage License.

Note on Usage

- BISL is authorised and regulated by the Financial Conduct Authority. However, users should note that the IBOR Fallbacks are not themselves separate benchmarks for purposes of the EU benchmark regulation (including similar applicable frameworks, 'BMR'). The relevant IBOR and RFR are the benchmarks used in the adjustment calculations.
- Users should be aware that prior to a Spread Adjustment becoming fixed upon the Spread Adjustment Fixing Date, neither that Spread Adjustment nor the associated IBOR Fallback should be used as a primary reference rate within a financial instrument or financial contract (or other 'use' as defined in the BMR) other than as a contractual fallback or as a conversion factor or price adjustment to facilitate transition to the Fallback Rate(s) or other rates. Use of Bloomberg's calculations to the contrary is expressly prohibited.

Further details are available in FAQs at <https://www.bloomberg.com/professional/solution/libor-resource-center/> or on the Terminal at ISDA <GO>. Bloomberg reserves the right to amend these commercial terms.

Appendix 1: Sample Calculation of IBOR Fallbacks¹²

Step 1: Determine the Accrual Start Date

- Let 16-Oct-2019 be the date for which a fallback for 3M USD LIBOR rate needs to be determined. This is the **Rate Record Day**
- Find the **Accrual Spot Date** by adding the spot lag for USD LIBOR which is two Reference Rate Business Days. This gives 18-Oct-2019, which is the Reset Date.
- Subtract the Offset Lag (two Reference Rate Business Days) from the above to get 16-Oct-2019 as the **Accrual Start Date**.

Step 2: Determine the Accrual End Date

Add tenor of 3M to the Accrual Start Date based on Modified Following Business Day convention. **Accrual End Date** is thus 16-Jan-2020

Step 3: Calculation of Adjusted RFR

$$ARR_{f,t} = \underbrace{\frac{DayCount_t}{DayCount_{RR}}}_{\mathbf{C}} \times \underbrace{\frac{1}{\delta_{f,t}E_{f,t}}}_{\mathbf{B}} \times \underbrace{\left[\prod_{u \in AP_{f,t}} (1 + \delta_{u,u+1} \times RFR_u) - 1 \right]}_{\mathbf{A}}$$

A = Determination of compounded rate, **B** = Annualizing factor,

C = Day count adjustment between the IBOR and the RFR (USD LIBOR and SOFR in this case)

Step 4: Determine the Median Period Start Date and Median Period End Date

- Subtract tenor from Rate Record Day to get 16-July-2019
- Median Period End Date is two Reference Rate Business Days earlier, i.e. 12-July-2019
- Median Period Start Date is five years subtracted from the start date, i.e. 12-July-2014

Step 5: Determine the spread adjustment

The **Spread Adjustment** is the median spread between the IBOR (in this case, USD LIBOR) and the Adjusted RFR for the above period

Step 6: Calculating the 'all in' Fallback rate

Fallback Rate = Adjusted RFR + Spread Adjustment

¹² Please reference the Rule Book available on ISDA <GO> on Bloomberg Terminal and Bloomberg's LIBOR Transition website, as well as ISDA's Benchmark Reform and Transition from LIBOR page for the associated terminology

Appendix 2: Bloomberg Tickers

The Fallback Rate for an IBOR ticker can be found by adding 'V' before the relevant IBOR ticker (e.g., 3-month USD LIBOR has the ticker US0003M <Index> and the Fallback Rate for 3-month USD LIBOR has the ticker VUS0003M <Index>). Similarly, the Spread Adjustment for an IBOR ticker can be found by adding 'Y' before the relevant ticker. For the Adjusted RFRs, the tickers usually follow the convention of adding a pre-fix 'X' and the two-character 'tenor' identifier to the reference rate name at the end (e.g. the Adjusted RFR for 1-week compounded SOFR is XSOFRIW <Index> and for the 3-month compounded SOFR tenor is XSOFR3M <Index>). Note the exceptions in the table for SONIA and for TONA. For the Overnight (O/N) or Spot Next (S/N) tenors, the '/' is removed.

Tickers for IBOR Fallbacks

IBOR Name	O/N	S/N	1W	2W	1M	2M	3M	4M	5M	6M	1Y
AUD BBSW	n/a	n/a	n/a	n/a	VBBSW1M	VBBSW2M	VBBSW3M	VBBSW4M	VBBSW5M	VBBSW6M	n/a
CAD CDOR	n/a	n/a	n/a	n/a	VCDOR01	VCDOR02	VCDOR03	n/a	n/a	VCDOR06	VCDORIY
CHF LIBOR	n/a	VSF00SN	VSF0001W	n/a	VSF0001M	VSF0002M	VSF0003M	n/a	n/a	VSF0006M	VSF001Y
EUR EURIBOR	n/a	n/a	VEUR001W	n/a	VEUR001M	n/a	VEUR003M	n/a	n/a	VEUR006M	VEUR01Y
EUR LIBOR	VEE00ON	n/a	VEE0001W	n/a	VEE0001M	VEE0002M	VEE0003M	n/a	n/a	VEE0006M	VEE001Y
GBP LIBOR	VBPO0ON	n/a	VBPO001W	n/a	VBPO001M	VBPO002M	VBPO003M	n/a	n/a	VBPO006M	VBPO01Y
HKD HIBOR	VHIHDON	n/a	VHIHD01W	VHIHD2W	VHIHD01M	VHIHD02M	VHIHD03M	n/a	n/a	VHIHD06M	VHIHDIY
JPY LIBOR	n/a	VJY00SN	VJY0001W	n/a	VJY0001M	VJY0002M	VJY0003M	n/a	n/a	VJY0006M	VJY001Y
JPY TIBOR	n/a	n/a	VTI0001W	n/a	VTI0001M	n/a	VTI0003M	n/a	n/a	VTI0006M	VTI001Y
JPY EuroYen TIBOR	n/a	n/a	VEUYN01W	n/a	VEUYN01M	n/a	VEUYN03M	n/a	n/a	VEUYN06M	VEUYNIY
USD LIBOR	VUS00ON	n/a	VUS0001W	n/a	VUS0001M	VUS0002M	VUS0003M	n/a	n/a	VUS0006M	VUS001Y

Tickers for Adjusted RFRs

IBOR Name	O/N	S/N	1W	2W	1M	2M	3M	4M	5M	6M	1Y
AUD BBSW	n/a	n/a	n/a	n/a	XAONIA1M	XAONIA2M	XAONIA3M	XAONIA4M	XAONIA5M	XAONIA6M	n/a
CAD CDOR	n/a	n/a	n/a	n/a	XCORRA1M	XCORRA2M	XCORRA3M	n/a	n/a	XCORRA6M	XCORRA1Y
CHF LIBOR	n/a	XSARONSN	XSARONIW	n/a	XSARON1M	XSARON2M	XSARON3M	n/a	n/a	XSARON6M	XSARONIY
EUR EURIBOR	n/a	n/a	XESTRIW	n/a	XESTR1M	n/a	XESTR3M	n/a	n/a	XESTR6M	XESTRIY
EUR LIBOR	XESTRON	n/a	XESTRIW	n/a	XESTR1M	XESTR2M	XESTR3M	n/a	n/a	XESTR6M	XESTRIY
GBP LIBOR	XSONIAON	n/a	XSONIA1W	n/a	XSONIA1M	XSONIA2M	XSONIA3M	n/a	n/a	XSONIA6M	XSONIA1Y
HKD HIBOR	XHONIAON	n/a	XHONIA1W	XHONIA2W	XHONIA1M	XHONIA2M	XHONIA3M	n/a	n/a	XHONIA6M	XHONIA1Y
JPY LIBOR	n/a	XTONASN	XTONA1W	n/a	XTONA1M	XTONA2M	XTONA3M	n/a	n/a	XTONA6M	XTONA1Y
JPY TIBOR	n/a	n/a	XTONATIW	n/a	XTONAT1M	n/a	XTONAT3M	n/a	n/a	XTONAT6M	XTONAT1Y
JPY EuroYen TIBOR	n/a	n/a	XTONA1W	n/a	XTONA1M	n/a	XTONA3M	n/a	n/a	XTONA6M	XTONA1Y
USD LIBOR	XSOFRON	n/a	XSOFR1W	n/a	XSOFR1M	XSOFR2M	XSOFR3M	n/a	n/a	XSOFR6M	XSOFR1Y

Tickers for Spread Adjustments

IBOR Name	O/N	S/N	1W	2W	1M	2M	3M	4M	5M	6M	1Y
AUD BBSW	n/a	n/a	n/a	n/a	YBBSW1M	YBBSW2M	YBBSW3M	YBBSW4M	YBBSW5M	YBBSW6M	n/a
CAD CDOR	n/a	n/a	n/a	n/a	YCDOR01	YCDOR02	YCDOR03	n/a	n/a	YCDOR06	YCDOR1Y
CHF LIBOR	n/a	YSF00SN	YSF0001W	n/a	YSF0001M	YSF0002M	YSF0003M	n/a	n/a	YSF0006M	YSF001Y
EUR EURIBOR	n/a	n/a	YEUR001W	n/a	YEUR001M	n/a	YEUR003M	n/a	n/a	YEUR006M	YEUR01Y
EUR LIBOR	YEE00ON	n/a	YEE0001W	n/a	YEE0001M	YEE0002M	YEE0003M	n/a	n/a	YEE0006M	YEE001Y
GBP LIBOR	YBP00ON	n/a	YBP0001W	n/a	YBP0001M	YBP0002M	YBP0003M	n/a	n/a	YBP0006M	YBP001Y
HKD HIBOR	YHIHDON	n/a	YHIHD01W	YHIHD2W	YHIHD01M	YHIHD02M	YHIHD03M	n/a	n/a	YHIHD06M	YHIHD1Y
JPY LIBOR	n/a	YJY00SN	YJY0001W	n/a	YJY0001M	YJY0002M	YJY0003M	n/a	n/a	YJY0006M	YJY001Y
JPY TIBOR	n/a	n/a	YTIO001W	n/a	YTIO001M	n/a	YTIO003M	n/a	n/a	YTIO006M	YTIO01Y
JPY EuroYen TIBOR	n/a	n/a	YEUYN01W	n/a	YEUYN01M	n/a	YEUYN03M	n/a	n/a	YEUYN06M	YEUYN1Y
USD LIBOR	YUS00ON	n/a	YUS0001W	n/a	YUS0001M	YUS0002M	YUS0003M	n/a	n/a	YUS0006M	YUS001Y

RFR and IBOR Tickers underlying IBOR Fallbacks

Currency	IBOR	RFR	IBOR Tenors	IBOR Bloomberg Tickers <Index>	RFR Bloomberg Tickers <Index>
AUD	BBSW	RBA Cash Rate	1M, 2M, 3M, 4M, 5M, 6M	BBSW1M ---- 6M	RBACOR
CAD	CDOR	CORRA	1M, 2M, 3M, 6M, 12M	CDOR01 ---12M	CAONREPO
CHF	LIBOR	SARON	S/N, 1W, 1M, 2M, 3M, 6M, 12M	SF00S/N, SF0001W, SF0001M --- 12M	SRFXON3 - 6pm CET
EUR	EURIBOR	€STR	1W, 1M, 3M, 6M, 12M	EUR001W, EUR001M --- 12M	ESTRON
EUR	LIBOR	€STR	O/N, 1W, 1M, 2M, 3M, 6M, 12M	EE00O/N, EE0001W, EE0001M --- 12M	ESTRON
GBP	LIBOR	SONIA	O/N, 1W, 1M, 2M, 3M, 6M, 12M	BP00O/N, BP0001W, BP0001M --- 12M	SONIO/N
HKD	HIBOR	HONIA	O/N, 1W, 2W, 1M, 2M, 3M, 6M, 12M	HIHDO/N, HIHD01W --- 2W, HIHD01M ---12M	HOISHKD
JPY	Euroyen TIBOR	TONA	1W, 1M, 3M, 6M, 12M	EUYN01W, EUYN01M --- 12M	MUTKCALM
JPY	LIBOR	TONA	S/N, 1W, 1M, 2M, 3M, 6M, 12M	JY00S/N, JY0001W, JY0001M --- 12M	MUTKCALM
JPY	TIBOR	TONA	1W, 1M, 3M, 6M, 12M	TI0001W, TI0001M --- 12M	MUTKCALM
USD	LIBOR	SOFR	O/N, 1W, 1M, 2M, 3M, 6M, 12M	US00O/N, US0001W, US0001M --- 12M	SOFRRATE

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+852-2977-6000

Tokyo

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Sydney

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