Testimony of Michael Rowan

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Before the

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Committee on Financial Services

Subcommittee on Oversight and Investigations

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Good morning Chairman Neugebauer, Representative Capuano and members of the Subcommittee. My name is Michael Rowan, and I am the Global Managing Director of the Commercial Group at Moody's Investors Service ("**Moody's**"). My group is responsible for Moody's business planning and strategy, which includes new business origination and the commercial side of the interactions that Moody's has with issuers. My position and my entire group were established to bring together all of our commercial functions under common leadership. This structure reinforces the separation between our analytical teams and the company's commercial activities. On behalf of my colleagues, I would like to thank you for the opportunity to participate in today's hearing and to speak to you about Moody's, the role that credit rating agencies can play in the market, our competitive landscape, and the impact of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("**Dodd-Frank Act**") on the credit rating agency industry.

In the past few years, numerous reform proposals affecting the regulatory infrastructure of the financial services sector have been the subject of vigorous, public debate. Moody's has welcomed the opportunity to discuss with private and public sector participants the role that rating agencies play in and the value that credit ratings can bring to the markets. As the supervisory framework for rating agencies has evolved, both in the United States and abroad, we have embraced the need for change because we believe that a modernized oversight regime will help increase confidence in credit ratings and the rating process, as well as instill greater discipline in the industry as a whole.

In providing you with our perspective on these questions, I would like to outline two principles that have guided us over the years.

First, Moody's believes that legislative initiatives that periodically review and update the regulatory regime under which market participants operate are both necessary and healthy. They can increase market confidence that the rules are fair and the playing field level. They also can encourage best practices among and across industries. In this regard, we supported the broad goal of the Credit Rating Agency Reform Act ("**2006 Act** ") to improve credit rating quality in the industry. Similarly, we believe that the Dodd-Frank Act promotes an important goal of bringing the regulatory infrastructure in line with recent market developments and innovations.

Second, we think that markets thrive when the regulatory landscape allows for and promotes differing views. It is equally important that contrarian opinions not only be tolerated but encouraged. For these reasons, Moody's has been a strong advocate of competition in our industry, so long as that competition occurs on the basis of credit ratings quality.

In my statement below, first, I will provide background on Moody's, including our credit rating system, the value we believe credit ratings bring to the market, and the use of credit ratings in the market. Second, I will address Moody's efforts to advance the quality, transparency and independence of our credit ratings. Third, I will discuss our support for healthy competition based on credit ratings quality. Finally, I will speak to the regulatory landscape for our industry and how it has evolved over time, highlighting our continuous support for reducing the mechanistic use of ratings in regulation.

I. Background on Moody's

Credit rating agencies occupy a narrow but important niche in the investment information industry. Our role is to disseminate forward-looking opinions about the relative creditworthiness of, among other things, financial obligations of corporations, banks, governmental entities, and pools of assets collected in securitized transactions.

Moody's is the oldest bond rating agency in the world, having introduced ratings in 1909. Since then, the industry has grown considerably. Today, there are over one hundred credit rating agencies around the world, and ten firms are registered with the SEC as Nationally Recognized Statistical Rating Organizations ("**NRSROs**").

Today, Moody's is one of the world's most widely used sources for credit ratings and research. Our credit ratings and analysis track a wide variety of issuers and debt instruments, including sovereign nations, corporate issuers, municipal issuers, and structured finance obligations. In addition, Moody's publishes credit opinions, transaction research, and commentary serving market participants around the globe.

A. Moody's Credit Rating System

Moody's credit ratings are forward-looking opinions that address just one characteristic of fixed income securities – the likelihood that debt will be repaid in accordance with the terms of the debt instrument. Our credit ratings reflect an assessment of both the probability that a debt instrument will default and the amount of loss the debt-holder is likely to incur in the event of default. In assigning our credit opinions, our analysts adhere to Moody's published credit rating methodologies, which we believe promote transparency and consistency in our global ratings.

Our credit ratings are expressed according to a system of letters and numbers, on a scale that has 21 categories ranging from Aaa to C. The lowest expected credit loss is at the Aaa level, with a higher expected loss rate at the Aa level, an even higher expected loss rate at the A level, and so on down through the rating scale. Moody's rating system is not a "pass-fail" system; rather, it is a probability-based system in which the forecasted probability and magnitude of credit losses rise as the rating level declines.

B. Value to Market

To meet market needs over time, our credit ratings have developed certain attributes:

- Insightful and robust analysis;
- Symbols that succinctly communicate opinions;
- Broad coverage across markets, industries and asset classes, enabling comparability; and
- Public availability of opinions.

These attributes have enabled our credit ratings to serve as a common point of reference for credit. That in turn has provided financial market professionals with a common language to compare credit risk across jurisdictions, industries and asset classes, facilitating the efficient flow of capital worldwide. In this regard, credit ratings can contribute to an improved knowledge of credit risk, which can promote market discipline. At Moody's, we intend for our credit ratings to help promote dialogue and debate among market professionals, who we expect to use our opinions as a point of consideration, not a replacement of their own credit analysis.

C. Use of Credit Ratings

Moody's credit ratings are opinions about credit risk, and as such they should be used as just one perspective on an issuer's or debt obligation's creditworthiness. Moody's also has always been clear and consistent in telling the market that our credit ratings should not be used for any purpose other than as a gauge of default probability and loss in the event of such default. In particular, Moody's credit ratings are not statements of fact about past occurrences or guarantees of future performance. They are not investment advice. Credit ratings do not address many other significant factors in the investment decision process, including, for example, price, term, likelihood of prepayment, liquidity risk and relative valuation. The likelihood that debt will be repaid is just one element, and in many cases may not be the most important element, in an investor's decision-making process for buying credit-sensitive securities.

II. Moody's Efforts to Advance the Quality, Transparency and Independence of Credit Ratings

Moody's has developed our reputation over a long period of time. We are, however, also well aware of the loss of confidence in the credit rating industry, largely driven by the performance of the U.S. residential mortgage-backed securities sector and related collateralized debt obligations. Over the past several years, Moody's has adopted – and will continue to adopt – a number of measures to regain the confidence of our ratings in that sector. These measures have been based on feedback we have received from the private and public sectors, as well as on our own deliberations and analysis of our ratings performance and credit market developments. The actions and initiatives that we have pursued in the recent past can be categorized into five broad categories:

- Strengthen the analytical integrity of credit ratings;
- Enhance consistency across rating groups;
- Improve transparency of credit ratings and the ratings process;
- Increase resources in key areas; and
- Bolster measures to mitigate conflicts of interest.

The Annex to my testimony summarizes a number of the recent initiatives we have pursued.[1]

One initiative that I wish to underscore is the creation of the department for which I am responsible: the Commercial Group. As explained at the outset of my testimony, this group is charged with business strategy and planning, new business origination, and business relationships with issuers. My position in particular was established to further bolster the management of the potential conflict of interest posed by our business model by, among other things, bringing the commercial functions under common and separate leadership. The Commercial Group's mandate builds upon measures that pre-dated the financial crisis, in which Moody's had first segregated rating analysts from fee discussions with issuers, and then extended that prohibition to their managers. Last year, we took those efforts one step further and created the Commercial Group to reinforce and strengthen the separation between our analytical functions on the one hand, and our commercial functions on the other. For example, the employees of the Commercial Group have

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[1] In line with our continuing efforts to be as transparent with the market as possible, we also have published a series of Special Comments describing the measures we had taken as of August 2008, December 2008, November 2009 and June 2011. These publications can be found on moodys.com. See *Strengthening Analytical Quality and Transparency: An Update on Initiatives Implemented by Moody's in the Past Twelve Months*, August 2008 (Document No. 110613); *Strengthening Analytical Quality and Transparency: An Update on Initiatives Implemented by Moody's in the Past Eighteen Months*, December 2008 (Document No. 113751); *Analytical Quality and Transparency: An Update on Initiatives Implemented by Moody's over the Past Two Years*, November 2009 (Document No. 119843); and *Moody's Investors Service Looks Forward as Regulatory Landscape Evolves*, June 2011 (Document No. 133553).

no involvement in determining or monitoring credit ratings or developing or approving rating methodologies. Equally as important, Moody's analytical employees are not involved in fee or payment discussions with issuers, which adds another layer of protection against the potential of conflict.

Moody's is continually analyzing and reevaluating our processes in an ongoing effort to strengthen internal mechanisms to manage conflicts of interest, as well as improve the quality, transparency, usefulness and integrity of our credit ratings.

III. Competition and Diversity of Opinions

Moody's competes in a large field of opinion providers, and we do not view other credit rating agencies as our only competitors. Rather, Moody's competes in a broader field that includes providers of purely quantitative and market based measures of credit risk, such as bond price indicators and credit default swap spreads. Moody's has continuously supported regulatory initiatives that encourage and increase the number of diverging, and at times contrarian, opinions.

From our perspective, healthy competition amongst the various opinion providers is good for the market because it provides incentives to improve the quality of opinions over time. We believe that more opinions can encourage dialogue and debate, which necessarily will improve broader market understanding of credit risks. Healthy competition, however, is not achieved if the number of credit rating providers increases while diversity in rating opinions declines.

A regulatory framework that produces the same opinion from multiple sources would eliminate quality-based competition and substitute in its place less investor protection-oriented alternatives. To support an information-efficient capital market, credit rating agencies should compete vigorously on the basis of the reliability and usefulness of differing and independently formed opinions. As a result, we have cautioned against regulating the substance of how rating agencies determine credit ratings. We have expressed this concern because some regulation can require or promote harmonization in the substance of rating opinions, methodologies or process, which undermines healthy competition and diminishes the diversity of opinions in the market. In our view, it is unhealthy for the markets if regulation demands or encourages one and only one prediction of the future.

IV. Changing Regulatory Landscape

Moody's supports regulatory reform and believes that effective regulation of credit rating agencies can help restore confidence and encourage greater discipline in our industry. We further believe that regulation is most successful when it is adopted with a clear understanding of the role of credit ratings in the financial system:

- First, credit rating agencies are providers of independent credit opinions.
- Second, their opinions speak to forward-looking and longer term credit risk to bond investors.
- Third, credit rating agencies compete among a number of opinion providers and market signals that offer different measures of credit risk.
- Fourth, the success of a credit rating agency depends on its ability to consistently provide predictive opinions about relative credit risk.

Moody's believes that the market is best served when legislation and regulation of the credit rating agency industry are consistent with the role that rating agencies play in the market.

A. 2006 Act

In September 2006, the 2006 Act was passed into law, establishing a formal regulatory regime for credit rating agencies for the first time. Specifically, it amended the Securities Exchange Act of 1934 by authorizing the Securities and Exchange Commission ("**SEC**") to oversee rating agencies that choose to apply for and become recognized by the SEC as NRSROs. The objective of the 2006 Act was "to improve ratings quality for the protection of investors and in the public interest by fostering accountability, transparency, and competition in the credit rating agency industry".[2] The legislation sought to:

a) enhance accountability by providing the SEC with oversight authority to assess the continued credibility and reliability of NRSROs;

b) promote competition through a clear process by which a credit rating agency can apply for and receive NRSRO designation; and

c) improve transparency by requiring NRSRO to make publicly available most of the information and documents submitted to the SEC in their applications.

In June 2007, the SEC published rules to implement the 2006 Act and achieve rigorous oversight of NRSROs, and on September 24, 2007, Moody's became a registered NRSRO. The SEC adopted additional final rules in February 2009 and November 2009. These initial and supplemental SEC rules have included, for example:

- Transparency requirements: concerning credit rating methodologies, rating performance, internal processes, and information pertaining to conflicts of interest.

- Conflict management requirements: regarding limits on the percentage of total net revenue an NRSRO can receive from any person or entity soliciting a credit rating, barring analysts from rating securities they own, and prohibiting analysts from making recommendations to any rated issuer.

In addition, using the statutory authority created under the 2006 Act, the SEC has conducted multiple examinations of NRSROs on a variety of subject matters.

B. The Dodd-Frank Act

In July 2010, the Dodd-Frank Act was signed into law to, among other things, "*promote the financial stability of the United States by improving accountability and*

[2] 2006 Act, Preamble.

transparency in the financial system…".[3] The Dodd-Frank Act has affected a number of institutions and industries, including credit rating agencies. Moody's is committed to implementing those provisions that are specific to our industry as effectively as possible.

Title IX, Subtitle C of the Dodd-Frank Act seeks to, among other things, enhance transparency and accountability in the credit rating agency industry, as well as strengthen management of conflicts of interest and reduce regulatory use of credit ratings. Moody's supports these objectives, and we believe they are positive for our industry and the broader market.

In particular, Moody's has long-supported removing references to credit ratings in regulation. Mechanical triggers, regardless of whether they are based on ratings, market signals or another type of measure, can inadvertently harm markets by amplifying rather than dampening the risks in the system. Specifically, automatic triggers can cause involuntary and mandatory reactions, such as augmenting capital cushions or divesting of exposures, with little room for discretion to consider more tempered responses. We caution that risks to market safety and stability will remain so long as any alternative measuring system is used to trigger overly mechanistic responses.

The majority of the provisions in Subtitle C seek to regulate the activities of those credit rating agencies that are registered as NRSROs. The general framework of Subtitle C can be categorized under two broad headings:

1) Provisions that will take effect after the SEC implements new rules.
2) Provisions that became effective immediately.

Over the past year, the SEC has been proposing rules and seeking comments for studies, as mandated by the Dodd-Frank Act. The SEC's published calendar for rule-making indicates that it expects to complete the rule-making process for NRSROs by the end of 2011. Moody's has submitted comments, and will continue to provide our views, throughout the SEC's established public comment process.

[3] Dodd-Frank Act, Preamble.

As the SEC continues its rule-making, we anticipate that the new rules will spur various changes in Moody's processes and operations, as well as lead to the codification and deepening of some of Moody's existing practices. In addition, because the majority of the provisions of the new requirements will be implemented through SEC rule-making, some uncertainty remains with respect to the final form and content of the overall regulatory regime for NRSROs. As rules develop and as our processes change in response, we intend to continue our communications with the market and policy makers.

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While we anticipate that the evolving regulatory landscape will lead to further changes in Moody's processes, our objective remains what it has been for the past 100 years: to provide the highest quality credit opinions, research and analysis.

Thank you again for inviting me to testify on this important matter, and I look forward to answering your questions.

ANNEX

Moody's Initiatives to Strengthen the Quality, Transparency and Independence of Our Credit Ratings

To assist the Subcommittee in its deliberations, this Annex summarizes various initiatives to strengthen the quality, transparency and independence of our ratings that Moody's has undertaken in the past couple of years.

The SEC has not completed the rulemaking required under the Dodd-Frank Act. Our processes will, of course, be changed and enhanced as a result of additional rules adopted by the SEC. Those anticipated modifications to our policies and practices are not catalogued below. Rather, this Annex includes only those initiatives that are currently in place. Moreover, this summary is intended to illustrate the types of initiatives we have been pursuing but is not a comprehensive list of all such initiatives.

I. General

» ***Revised Major Policies:*** We revised several core policies in 2010 to reflect changes we have made to our structures, practices and systems as part of our ongoing efforts to implement regulatory reforms and enhance confidence in the quality, integrity and independence of our ratings. Among other things, we revised the Moody's Investors Service Code of Professional Conduct ("**MIS Code**"), the Moody's Corporation ("**MCO**") Code of Business Conduct, and the MCO Securities Trading Policy.

II. Strengthening Analytical Quality of Credit Ratings

» ***Established Macroeconomic Board:*** In prior publications we explained how, as part of our efforts to promote greater consistency across rating groups, credit opinions now incorporate a common, central macroeconomic scenario and alternative risk scenarios that are developed by MIS on a semi-annual basis. We publish these scenarios as part of our Global Risk Perspectives series. In 2010, in response to MIS's perception of the significance of macroeconomic assessment as part of the ratings process, MIS established the Moody's Macroeconomic Board. The Macroeconomic Board is chaired by MIS's Chief Credit Officer and consists of Moody's economists and sovereign analysts. Broadly, the Macroeconomic Board is responsible for: (1) determining a consistent set of macroeconomic forecasts for use in the rating process; (2) facilitating analysts' access to these forecasts; and (3) encouraging the development of macroeconomic sensitivity analysis within each sector.

» ***Recalibrated U.S. Public Finance Ratings:*** In 2010, we recalibrated our long-term U.S. public finance credit ratings to our global rating scale, thereby enhancing the comparability of ratings across the MIS-rated universe.

- ***At Least Annual Reviews of Ratings:*** Except for ratings that clearly indicate they do not entail ongoing monitoring, once MIS publishes a rating, we monitor it on an ongoing basis and modify it as appropriate in response to changes in our opinion of the creditworthiness of the issuer or obligation. Prior versions of the MIS Code reflected our commitment to this monitoring through periodic reviews as well as reviews triggered by MIS's receipt of information that might reasonably be expected to result in a rating action. In 2010, we enhanced this provision to reflect our intention to conduct at least annual reviews of all credit ratings, except those that expressly indicate that they are not subject to ongoing monitoring.
- ***Annual Methodology Reviews:*** In the past few years Moody's has reinforced the independence of our Credit Policy function and taken steps to enhance our existing methodology review and approval processes, under the oversight of the Credit Policy Group. For example, we revised the MIS Code in 2008 to codify our practice of conducting periodic methodology reviews and expressly assign responsibility for these reviews to the Credit Policy Group. In 2010, we further revised the MIS Code to provide that such reviews will be conducted at least annually.
- ***Methodological Initiatives:*** On an ongoing basis, MIS takes steps to update and enhance the predictive content of its rating methodologies. In addition, since late 2009, we have pursued a number of major methodological initiatives. These include: (1) adopting a new money market fund rating methodology and symbols; (2) revising our guidance on how we assess hybrid securities; (3) proposing a set of operational risk principles to be considered in ratings of structured finance transactions; (4) publishing two sets of guidance on our approach to global standard adjustments in our analysis of the financial statements of financial institutions and non-financial companies, respectively; (5) publishing guidance on the circumstances in which we will, or will not, rate contingent capital securities; (6) seeking comment on alternative approaches for assessing the impact of temporary missed debt payments; and (7) proposing an update to our joint support methodology for letter of credit-backed transactions in the U.S. municipal market.

III. Improving Transparency of Credit Ratings and Ratings Process

- **Enhanced disclosures associated with credit rating announcements:** Since late 2009, MIS has introduced a variety of enhancements to the disclosures incorporated into most credit rating announcements. For example, MIS now discloses in most rating announcements: (1) the types of information sources used to prepare the credit rating; (2) if an obligation is supported by a new asset type or possesses a unique structural feature that is significant and noteworthy to the market; (3) that MIS considers the quality of the information available with respect to the issuer or obligation satisfactory for the purpose of assigning or maintaining the credit rating, as applicable; (4) if a rating action is based on limited historical data; and (5) if the rating was initiated by MIS and not requested by the issuer or if the issuer did not participate in the rating process. In addition, MIS's credit rating announcements in respect of structured finance instruments also now disclose, among other things whether or not MIS received and took into account any third party due diligence reports on the underlying assets and, if so, the impact, if any, such reports had on the rating.

» ***Added structured ratings indicator:*** Since August 2010, MIS has been using a structured finance ratings indicator on a global basis for its new and existing credit ratings. The indicator, which takes the form of "(sf)", appears following the rating in all MIS press releases and research reports.

» ***Added hybrid indicator for financial institutions:*** In January 2011, MIS began using a hybrid securities indicator on a global basis for all its new and existing credit ratings of hybrid instruments issued by financial institutions. The hybrid indicator, which takes the form of "(hyb)", signals the potential for ratings volatility due to the securities' equity-like features and the potential impact of hard to predict events such as regulatory or government intervention.

» ***Extended rating history data files:*** In 2009, MIS began publishing complete rating histories in a downloadable, machine-readable file for a random sample of 10% of credit ratings. In 2010, MIS also began publishing a separate, downloadable, machine-readable file containing rating histories for all MIS credit ratings that MIS initially determined on or after June 26, 2007. These data files are now available in XBRL format. These data files supplement the various ratings performance studies that MIS makes available to the public on the Ratings Performance page on moodys.com.

» ***Research focusing on areas of interest for users of ratings:*** To improve transparency, MIS has been publishing additional research for those areas where users of our ratings have expressed a particular interest. These areas are subject to changes in the market and the needs of users of our ratings. For example, given the increased level of interest in U.S. public finance issuers, we have, among other things, published an updated default study, a series of comments on state and local government issuers' pension obligations, a series on market access rollover risks of short-term debt and bank-supported debt instruments, in-depth research on the credit risks posed by governance and management at not-for-profit issuers like hospitals and universities, and a comparison of U.S. states to companies. We also launched the Muni Monitor, a periodic compilation of key research on the most pressing issues in the U.S. public finance market. In both 2009 and 2010, we published a series of "Roadmaps" that identified the key credit factors we expected to be prominent in our analysis of U.S. public finance obligations over the coming year. In the financial institutions sector, we revised the format of our Banking System Outlooks by introducing a consistent set of credit factors and metrics to enhance the clarity and comparability of our analysis across regions. We also have published a number of special comments outlining how we conduct "stress tests" in the financial institutions sector and analyzing the stress tests being conducted by financial sector authorities.

IV. Bolstering Measures to Manage Conflicts and Promote Analytical Integrity

» ***Reinforced operational segregation of credit rating and credit policy functions from commercial functions:*** MIS analysts have been prohibited for quite some time from discussing fees with issuers and, several years ago, we extended this prohibition to managers of rating teams. In 2010, we further enhanced the operational segregation of the credit rating/policy functions from commercial functions by establishing the MIS Commercial Group. It is responsible for business strategy and planning, new business origination, and business relationships with issuers. Members of the Commercial Group do not have any involvement in determining or monitoring credit ratings or developing or approving rating methodologies.

V. Enhancing Resources and Their Use in Key Areas

» ***Compliance:*** MIS continues to add resources allocated to our Compliance function to facilitate policy development, monitor adherence to policies and conduct training. For example, in 2010-11, we created and staffed four management-level positions. Two of these new positions focus on compliance at a regional level, while the other two positions have global responsibilities relating to, among other things, policy development, training, and the investigation and resolution of alleged breaches of policies.

» ***Change Leadership:*** In 2010, we created and staffed a managing director ("**MD**") level position at MIS focusing on change leadership. Our new MD of Global Operations is working with management of MIS and others to integrate the broad spectrum of resource, project and change management activities underway in MIS in order to address changes in the regulatory and competitive environment, improve MIS's operational efficiency and better position MIS to achieve its strategic objectives.

» ***Quantitative Tools:*** In 2010, MIS created new teams within the rating groups to focus on developing and expanding the quantitative tools that support MIS's credit analytical functions. These teams are being staffed primarily by existing employees who have special skills in data analysis and computational engine development as well as knowledge of MIS's rating operations.

» ***Board Oversight:*** In 2010, the board-level oversight of certain MIS activities was strengthened. Enhancements at the board level include allocating to independent directors responsibilities for, among other things, overseeing MIS's policies and procedures for determining credit ratings, internal controls relating to those policies and procedures, and policies and procedures relating to conflicts of interest.

» ***Surveillance Initiatives:*** MIS continues to enhance its approach to ratings surveillance across the various rating groups. For example, since late 2009, MIS has hired additional analysts focusing on surveillance of U.S. local government issuers and is investing further in technology to enhance the surveillance process in this sector.

» ***Training:*** Since late 2009, we have enhanced our training programs in three key areas: knowledge and skills training for analysts, leadership and management training, and compliance training. For example, we have extended the range of courses offered as part of our continuing education program for analysts, delivered more classes in-person in MIS's smaller offices, added courses targeted to the specific needs of smaller analytical groups, and provided more courses targeting soft skills such as writing and communication skills. We also are launching a curriculum-based training program for junior analysts that is based on a common framework, which is then tailored to the needs of specific geographic regions and analytical sectors. Our online and instructor-led management training programs enhance our operational efficiency and better position those with management responsibilities to develop and motivate MIS employees as well as promote MIS's values of integrity, independence, insight, inclusion and intellectual leadership. Our compliance training programs are designed to inform MIS employees of new regulatory requirements, reinforce their understanding of existing compliance policies and procedures and provide additional opportunities for employees to seek guidance from Compliance staff on the interpretation of specific requirements.

» ***Enhanced Middle Office Frees up Analytical Resources:*** As part of MIS's efforts to improve its operational efficiency, certain tasks relating to the rating process that do not require credit analysis have been transferred from rating teams to MIS's Global Middle Office ("**GMO**"), thereby enabling our analysts to devote more of their time to analytical work. For example, the preparation and dissemination of rating letters, which communicate to the issuer the rating assigned by MIS, are now carried out by our GMO.

United States House of Representatives
Committee on Financial Services

"TRUTH IN TESTIMONY" DISCLOSURE FORM

Clause 2(g) of rule XI of the Rules of the House of Representatives and the Rules of the Committee on Financial Services require the disclosure of the following information. A copy of this form should be attached to your written testimony.

1. Name:	2. Organization or organizations you are representing:
Michael Rowan	Moody's Investors Service

3. Business Address and telephone number:

[redacted]

4. Have you received any Federal grants or contracts (including any subgrants and subcontracts) since October 1, 2008 related to the subject on which you have been invited to testify?	5. Have any of the organizations you are representing received any Federal grants or contracts (including any subgrants and subcontracts) since October 1, 2008 related to the subject on which you have been invited to testify?
☐ Yes ☒ No	☐ Yes ☒ No

6. If you answered .yes. to either item 4 or 5, please list the source and amount of each grant or contract, and indicate whether the recipient of such grant was you or the organization(s) you are representing. You may list additional grants or contracts on additional sheets.

7. Signature:

Please attach a copy of this form to your written testimony.