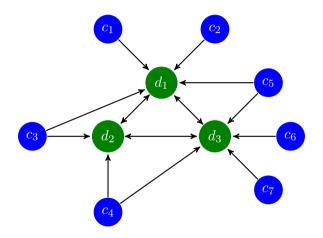
### Post-crisis bank regulations and financial market liquidity

Darrell Duffie GSB Stanford

2018 RiskLab–Bank of Finland–ESRB Conference on Systemic Risk Analytics Helsinki, May 28-30, 2018

Based in part on research with Leif Andersen, Antje Berndt, Yang Song, and Yichao Zhu

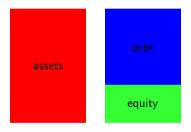
#### A bank-intermediated over-the-counter market



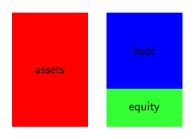
## Implications of post-crisis regulations for market efficiency

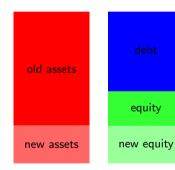
- More financial stability from higher bank capitalization and bail-in failure resolution.
- 2 Increased cost of access to bank balance sheets.
  - The leverage-ratio rule has reduced incentives to intermediate safe assets.
  - Bail-in failure resolution has significantly increased bank funding costs.
- Market infrastructure and new competition rules lower the need for balance-sheet space.

#### **Dealer balance sheet**

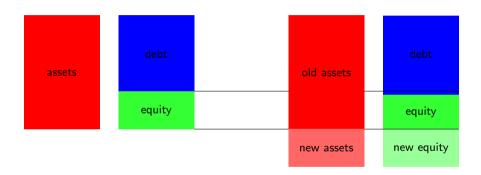


### More equity to fund more assets



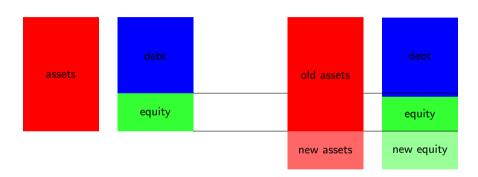


#### Legacy shareholders have subsidized creditors



Higher capitalization implies a value transfer from legacy shareholders to creditors.

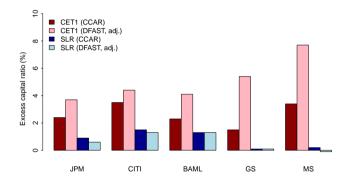
#### **Debt overhang**



For shareholders to break even, the new assets must be purchased at a profit that exceeds the value transfer to creditors. (Myers, 1977)

### Leverage ratio rule is more binding than risk-based capital rules

Results of the Fed's 2017 stress tests for the largest US dealer banks



**CCAR:** stressed CET1 after assumed payouts, less 4.5%; stressed SLR less 3.0%. **DFAST, adjusted:** stressed CET1 (no payouts) less (4.5% + G-SIB surcharge); stressed SLR less the G-SIB minimum of 5%.

#### European banks reduce their balance sheets at quarter ends

# Daily collateral outstanding in the tri-party repo market and the Federal Reserve's overnight reverse repo (ON RRP) facility

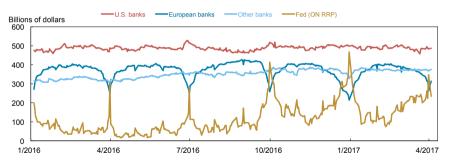
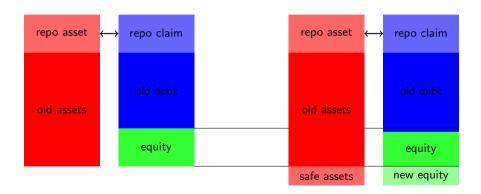


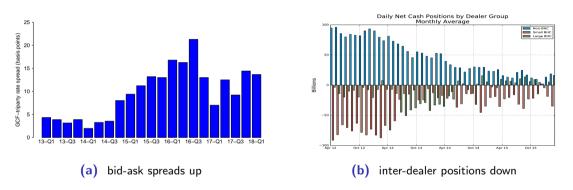
Figure Source: Egelhov, Martin, Zinsmeister, Federal Reserve Bank of New York, August, 2017.

Notes: Banks headquartered in the euro area and Switzerland report leverage ratios as a snapshot of their value on the last day of each quarter, while their U.S. counterparts report quarterly averages. Totals only include trades backed by Fedwire-eligible securities—that is, U.S. Treasury and agency securities—securities—that is, U.S. areasury and agency securities—that is, U.S. areasury are also are also

# Impact of the leverage-ratio regulation on repo intermediation costs to legacy shareholders



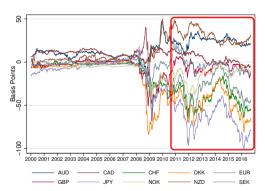
### Impact of SLR on UST repo market efficiency



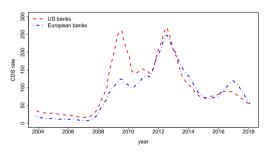
**Figure:** (a) Average within-quarter difference between overnight GCF and Tri-party repo rates. Data sources: Bloomberg and BNY-Mellon. (b) Figure source: Antoine Martin, FRBNY (2016).

#### Cross-currency basis and bank funding costs

Funding value adjustments now leave wider arbitrage bounds on the basis



(a) 5-year USD cross-currency basis. Source: Du, Tepper, and Verdelhan (2017).



(b) 5-year dealer credit spreads

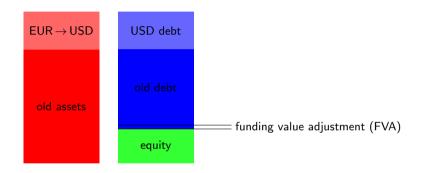
#### CIP arbitrage can be costly to dealer shareholders

Debt overhang cost for funding synthetic dollar deposits



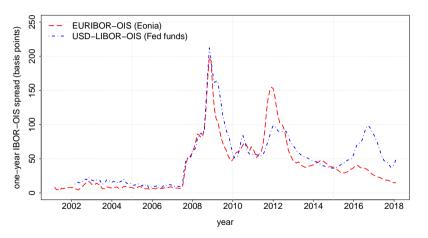
To benefit shareholders, the trade profit must exceed the funding value adjustment (FVA), a debt-overhang cost.

#### **Funding cost to shareholders**



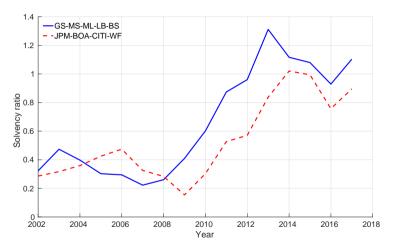
A debt-funded safe arbitrage is not valuable to bank shareholders unless it's excess yield is above the bank's credit spread. Source: Andersen, Duffie, Song (2018)

### Increased dealer credit spreads imply larger funding-cost wedges



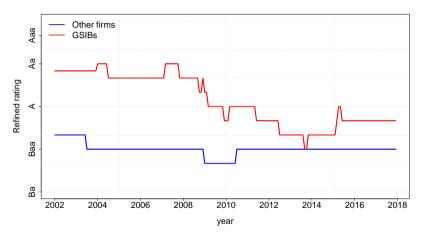
Spreads between one-year IBOR and OIS rates. Data source: Bloomberg.

### But big dealer-banks now have much bigger capital buffers



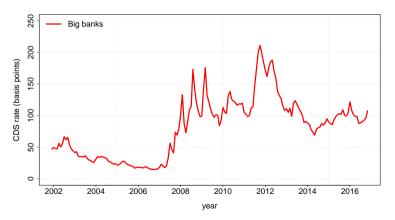
Solvency ratio: tangible equity divided by an estimate of the standard deviation of the annual change in asset value. Source: Berndt, Duffie, and Zhu (2018).

#### G-SIB credit ratings no longer include sovereign uplifts



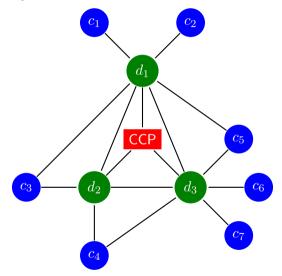
Median refined credit ratings. Data source: Moody's Investors Service.

## G-SIB 5-year credit spreads at annual default probability of 0.5%



From a preliminary panel regression of log 5-year CDS rates on distance to default, for 1.6 million observations, 855 firms, 2002-2017, with interacted time and G-SIB fixed effects. Source: Berndt-Duffie-Zhu (2018).

#### Central counterparties reduce need for balance-sheet space



#### Compression eliminates space used for redundant swaps

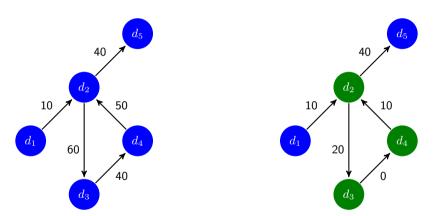
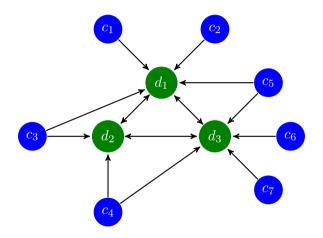


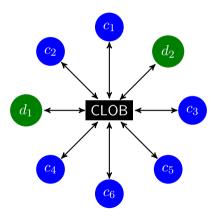
Figure: Counterparty exposures and initial margin are reduced without changing market exposures. Providers include TriOptima, which has eliminated over \$1 quadrillion notional of swaps.

#### A bank-intermediated bilateral OTC market



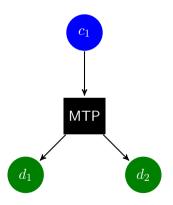
### Improving trade competition

Objective: Migration of actively traded products to all-to-all trade platforms

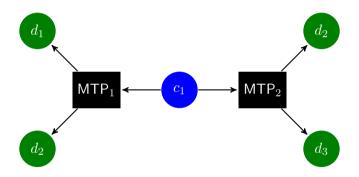


### OTC competition after Dodd-Frank and MiFID

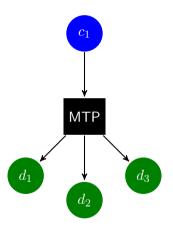
Buy-side firms request quotes at multilateral trading platforms



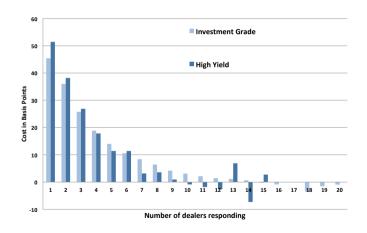
### **Excessive fragmentation across platforms**



### Reducing fragmentation improves competition

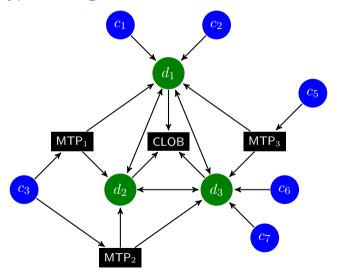


# At corporate bond platforms Dealer competition lowers buy-side trade costs



Source: Hendershott and Madhavan (2016)

### Now typical fragmented two-tiered OTC markets



### Appendix: How CIP arbitrage costs dealer shareholders

- Suppose the one-year USD risk-free rate is zero.
- Our bank has a one-year credit spread of 35 basis points.
- ▶ We borrow \$100 with one-year USD commercial paper, promising \$100.35.
- We invest \$100 in one-year EUR CP, swapped to USD, with the same all-in credit quality as that of our bank's CP, and uncorrelated.
- $\triangleright$  Suppose the EUR CP, swapped to dollars, promises \$100.60, for a basis of -25bps.
- ▶ We have a new liability worth \$100 and a new asset worth  $100.65/1.0035 \simeq 100.25$ , for a trade profit of approximately \$0.25.
- ► However, the marginal value of the trade to our shareholders is negative, because, *conditional on dealer survival*, the expected incremental payoff to equity is \$100.25 \$100.35 = -\$0.10. Conditional on default, equity gets nothing.

### **Appendix: Funding Costs to Dealer Shareholders**

From work with Andersen and Song (Journal of Finance, 2018): The marginal increase in the value of the dealer's equity per dollar of a debt-funded asset purchase is

$$p^*\pi - \delta \text{COV}^* - \text{FVA},$$

#### where

- $ightharpoonup p^*$  is the dealer's risk-neutral probability of survival to term.
- $\blacktriangleright$   $\pi$  is the trade profit (P&L).
- $\triangleright$   $\delta$  is the risk-free discount.
- ► COV\* is the risk-neutral covariance of the asset payoff and dealer default event.
- FVA is the funding value adjustment  $p^*\delta ST$ , where S is the dealer's credit spread and T is the term.

The extra marginal cost to dealer shareholders when a fraction  $\alpha$  of the funding must be equity is  $\alpha(1-p^*-\text{FVA})$ , which annualizes to roughly  $\alpha S$  (assuming a loss given default of 0.5).

For safe assets, the shareholder breakeven "arbitrage" yield is thus the total annualized funding cost to shareholders of roughly  $(1 + \alpha)S$ .