



Trading Stocks in America: Key Policy Issues

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Daniel Weaver

Rutgers Business School

daniel_weaver@rbsmail.rutgers.edu

Rutgers Business School

The “Good” Old Days

- Manual Trading
- Order Delivery by Phone
- Conditional Quotes
- Eighth Ticks

Crash of 1987 – First Step Forward

- Small Order Execution System
 - NASDAQ quotes could be hit or lifted electronically
 - First wide usage of automatic execution
 - Harvey Houtkin – First SOES Bandit
 - Forbearer of today's High Frequency Traders

Pre 1996

- NASDAQ viewed itself as a pure dealer market
 - Public limit orders were largely ignored
 - BBO was only NASDAQ (dealer) quotes
 - The only electronic communication network was INSTINET
 - Most order flow was subject to preferencing agreements between brokers and dealers
 - Cash Payment for order flow or soft dollar

Pre 1996

- NYSE Liquidity had inertia
 - Dealers and Regional Exchanges could pay brokers to send orders to them
 - Payments could be substantial
 - Minimum needed spreads were much less than quoted spreads
 - Rounding due to 1/8 tick
 - By only buying small retail orders could avoid losing to informed traders

Order Handling Rules

- Limit orders were able to directly compete with dealer quotes
- Led to creation of a large number of ATSs (e.g., Island, Arca, etc.)
 - Automatic execution
 - Charged traders to access quotes (taker model)
 - Did not pay rebates for orders at first

Decimalization

- Larger tick sizes led to spreads being larger than what they could be
- These excess profits were used to pay for order flow
- Critics felt that PFOF led brokers to route orders to venues that paid the most
- Ticks were reduced to 1/16 then 1 cent
- PFOF was reduced but not eliminated
 - Venues could continue to earn money to pay for order flow by only buying small retail orders

Today

- The ATSs have adopted the maker/taker model
- Exchanges followed suit to compete
- Brokers have learned to earn the spread
 - Internalizing orders
 - Create dark pools where customers can pay brokers to interact with client order flow

Does it matter?

- YES
- Battalio, Corwin, and Jennings
 - routing to highest rebate results in lower market quality
- My paper on internalization
 - Higher internalization rates lead to wider spreads

What could help?

- Trade-at rule?
- Toronto Stock Exchange adopted similar rule
 - A significant reduction in spreads
- Critics say not necessary since spreads are lower than they have ever been
 - Don't look at what spreads are
 - Rather – what they could be
- Critics say we should allow venues to compete for order flow
 - But they compete for order flow from brokers not natural buyers and sellers

Wider Ticks and IPOs

- Proposal to adopt wider ticks for IPOs to attract liquidity
 - Recall wider ticks = Higher payment for order flow (rebates)
- Fragmented trading of IPOs leads to more under pricing
- Alternative proposal to attract order flow
 1. Have IPOs trade exclusively on a single exchange for a significant period
 2. Allow IPO firms to pay for a liquidity provider as they do in Europe.
 3. Leave tick size alone