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Trading in Fragmented Markets

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Abstract

This paper applies an econometric model of imperfect competition to equity trading with competing exchanges. Stock of the same company is traded on multiple venues today. This development was driven by regulations, aimed at benefiting investors by fostering competition among exchanges. However, the welfare consequences of increased exchange competition are theoretically ambiguous. While competition does place downward pressure on the bid-ask spread, this force may be outweighed by increased adverse selection that stems from additional arbitrage opportunities. We investigate this ambiguity empirically by estimating key parameters of the model using detailed trading data from Australia. The benefits of increased competition are outweighed by the costs of multi-venue arbitrage. Compared to the prevailing duopoly, we predict that the counterfactual spread under a monopoly would be 23 percent *lower*. Further, market design variations on the continuous limit order book would eliminate profits from cross-venue arbitrage strategies and reduce the spread by 51 percent. Finally, eliminating off-exchange trades, so-called dark trading, would reduce the spread by 11 percent.

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1 Introduction

Over the past decade, equity markets have become increasingly fragmented. In December 2004, the US had 14 venues for trading equities, and NYSE handled 79.5 percent of trade volume in NYSE-listed stocks. By December 2013, the number of active trading venues had risen to 55, and the NYSE share of trading in NYSE-listed stocks had fallen to 22.5 percent (NYSE Euronext, 2014; BATS Global Markets, 2014).¹ Similar changes have taken place in Australia, Europe, and Japan. We present and estimate a model of imperfect competition to investigate the effect of this development. This proliferation of trading venues and the accompanying dispersion of trades were actively encouraged by the Securities and Exchange Commission, in which the regulator argued that “vigorous competition among markets promotes more efficient and innovative trading services” (SEC, 2005, Reg NMS).

The intuition that competition among exchanges benefits investors should resonate with any economist. However, in public equity markets there may be drawback to spreading out trade across markets: dispersion may create opportunities for fast traders to engage in high-frequency arbitrage across venues. In this paper, we consider a model in which markets compete for traders and there is potential for arbitrage trading as in Budish, Cramton, and Shim (2013, BCS), who focus on a single market. Traders are either regular investors with an intrinsic motive to buy or sell, or professionals who trade for profit in two ways. They either provide liquidity, by offering to intermediate between investors, or they engage in arbitrage, by exploiting differences between quoted prices and the fundamental asset value.

With more exchanges, venues charge lower fees to attract traders. However, traders who provide liquidity face more difficult conditions, because any news about fundamentals enables an arbitrageur to trade against more active quotes in aggregate before they can be adjusted or withdrawn, with a constant amount of regular investor trades against whom to offset these losses. We capture this trade-off in a parsimonious model of continuous time limit order book

¹The term “trading venue” encompasses (i) formal exchanges, (ii) alternative trading systems (ATSs), which include dark pools and electronic crossing networks, and (iii) national securities associations (i.e. NASDAQ before it became an exchange). The number of venues is estimated based on figures by Mostowfi (2014, TABB Group), SEC and FINRA (2014).

trading, which extends the high-frequency trading model of [BCS](#). We show that depending on factors such as the extent of the private transaction motives of investors, their arrival rate to the market, and their willingness to substitute among different exchanges, the introduction of new exchanges can either increase or decrease the spreads faced by regular investors.

We then perform an empirical analysis of how an increase in exchange competition affects trading. Our data comes from Australia whose market environment consists of only two formal exchanges but is otherwise very similar to that of the United States. We use data from the first half of 2014 to estimate the parameters of our model. We find that investors are worse off under the prevailing duopoly than they would be under a monopoly exchange.

In [section 2](#) we develop a model of exchange competition, and we analyze its equilibrium in [section 3](#). Our baseline model features a single asset whose shares are traded in continuous limit order books on multiple exchanges. The fundamental asset value is public information and evolves stochastically as a random walk. There are three types of strategic decision makers: exchanges, high-frequency traders, and investors. Exchanges operate trading platforms and earn profits from transaction fees. High-frequency traders may trade for profit by speculating or by facilitating transactions with other traders. Investors arrive stochastically with private trading motives and are differentiated along two dimensions. First, they differ by the strength of their private need to transact. Second, they differ in terms of their willingness or ability to substitute among venues for a given price difference. That investors do not always choose to trade at the exchange offering the best price may be the result of a market friction, such as an agency problem between an investor and the broker who routes his orders to an exchange.

Two forces give rise to a bid-ask spread in this model: *(i)* the market power of exchanges, and *(ii)* adverse selection stemming from a race to react to information. Regarding the second force, although information is publicly observable, adverse selection arises from a liquidity provider's inability to cancel mispriced quotes. A change in the number of venues affects the magnitude of each of these two forces. There are consequently two opposing channels through which a change in the number of exchanges affects the equilibrium bid-ask spread. First, an

increase in the number of exchanges reduces the bid-ask spread through the “competition channel.” Intuitively, exchanges have less market power when there are more exchanges. They consequently charge lower transaction fees, which are passed on as lower spreads, other things being equal. Second, an increase in the number of exchanges raises the spread through the “exposure channel.” Because investor demand is indivisible, one share must be offered at the bid and the ask at each exchange. With more exchanges present, the aggregate book is therefore deeper.² More aggregate depth, in turn, implies that for any given change in fundamentals there are more mispriced quotes and, thus, more arbitrage opportunities. This creates more adverse selection for liquidity providers, who in turn demand a higher spread, other things being equal. Theory is silent on whether lower spreads will prevail under a monopoly or an oligopoly, since either the competition channel or the exposure channel may dominate.

In section 4 we investigate empirically the magnitudes of these two forces. We analyze order-level data pertaining to the Australian exchange-traded fund SPDR S&P/ASX 200 FUND (STW). Our sample comprises 76 trading days from the first half of 2014. Australia provides a unique opportunity for testing hypotheses relating to competition among exchanges because a large fraction of the equity trading universe is observable. First, there are only two formal exchanges active in Australia, the Australian Securities Exchange (ASX) and Chi-X Australia (Chi-X). We have data on both. Second, for the security that we study there are no overlaps in trading hours with exchanges other than ASX and Chi-X. Thus, our dataset contains all actions that affect “lit” equity trading. Third, “dark” trades, or trades that take place off formal exchanges, which are not observed by us, occur less frequently in Australia than in the United States.³ This is important since dark trades are not observed by us. We then use the STW data to estimate the parameters of our model.

In section 5 we evaluate a number of counterfactuals of the estimated model. In the first

²That aggregate depth is increasing in the number of trading venues is a stylized fact that has been documented in the empirical literature (Boehmer and Boehmer, 2003; Fink, Fink, and Weston, 2006; Foucault and Menkveld, 2008; Aitken, Chen, and Foley, 2013).

³In August 2014 dark trades accounted for 37.0 percent of the shares traded in the US compared to 21.3 percent of shares traded in Australia (BATS Global Markets, 2014; Fidessa, 2014).

class of counterfactual analyses, we compare the currently observed outcome under a duopoly to what would prevail under a monopoly. We find that the counterfactual monopoly spread would be 23 percent lower than the duopoly spread of 2.9 cents. In other words, the exposure channel dominates the competition channel in the case of STW.

Next, we use the estimated model to study an alternative trading mechanism aimed at mitigating the adverse selection that stems from the race to act on public information. We propose a mechanism, which we call selective delay, a modification of the continuous limit order book whereby a small delay is added to the the times at which certain order types are processed. This mechanism protects the liquidity provider by allowing him to cancel stale quotes before they are exploited. This reduces the equilibrium spread by eliminating the adverse selection component, leaving only the market power component. Using the estimates to quantify this reduction, we find that with two exchanges the counterfactual spread under a selective delay duopoly is 51 percent lower than the spread under the limit order book status quo. In an appendix we compare selective delay to frequent batch auctions, a familiar design approach that has gained recent popularity ([Madhavan, 1992](#); [Budish, Cramton, and Shim, 2013](#)). In our setting, the two designs achieve equivalent outcomes, yet there are several reasons to think that selective delay is easier to implement.

Finally, we use the estimated model to inform our understanding of the effects of dark trading. Such trades occur outside of the scope of an order book of an exchange, and they consist of internalization of retail order flow by brokers, trading in dark pools, and over-the-counter trades. Dark trades have increased in prevalence over the past decade and their effects on formal exchanges are currently being debated. We study the counterfactual of eliminating dark trading in Australia, which currently constitutes 21 percent of volume traded there. Within the model this corresponds to a commensurate increase in the arrival rate of investors at the exchanges. This reduces adverse selection and lowers the equilibrium spreads on exchanges by 11 percent.

1.1 Related Literature

This paper contributes to the literature on competition between platforms in financial markets. Early contributions to this literature have identified several mechanisms through which market fragmentation can decrease welfare: with many venues price variance on a market may increase (Economides and Siow, 1988); price impact of a single trader may be larger (Pagano, 1989); a coordination failure of buyers meeting sellers may arise (Mendelson, 1987); or adverse selection may increase since an informed trader has more opportunities to camouflage (Chowdhry and Nanda, 1991). Typically, in these earlier contributions multiple markets are modeled as operating in isolation without cross-venue arbitrage. On the other hand, a defining characteristic of trading today is that markets are electronically linked and information flows quickly from one venue to another. In this paper we show that even if traders are informed about all markets, the welfare consequences of competition among exchanges are ambiguous.

More recent theory papers tend to associate fragmentation with welfare increases through the following mechanisms: lower trading fees (Colliard and Foucault, 2012); and greater product differentiation, which benefits heterogeneous investors (Pagnotta and Philippon, 2013). In this paper we embed an exchange oligopoly in an equilibrium model of continuous time trading with heterogeneous agents. We formalize a new channel of how fragmentation can increase the risk of liquidity provision, and we show its empirical significance.

Our model of trading is connected to the branch of the literature that has focused on adverse selection. Early models of this include Copeland and Galai (1983) and Glosten and Milgrom (1985). More recently, Budish, Cramton, and Shim (2013) have demonstrated that similar forces arise in limit order books even when information is public. While our model builds upon their framework, we allow for imperfect competition among exchanges, which provides an additional source of a bid-ask spread.

Finally, this paper is related to a rich empirical literature on fragmentation of financial markets. Typically, these papers either evaluate cross-sectional variation of fragmentation (O'Hara and Ye, 2011; Gajewski and Gresse, 2007; Porter and Thatcher, 1998) or panel

variation of fragmentation (Körber, Linton, and Vogt, 2013; Degryse, de Jong, and van Kervel, 2014), or they study a change in market structure, such as entry by an exchange (Menkveld, 2013, 2014; Aitken, Chen, and Foley, 2013), the expiration of warrants (Amihud, Lauterbach, and Mendelson, 2003), or changes in the trading rules (Davis and Lightfoot, 1998). There is little consensus among these papers as to the effects of fragmentation. A common difficulty with all these approaches is clean identification. Specifically, the addition of a new exchange may be disruptive to the market, may occur over a long time horizon of months or more, and the market may take some time to converge to the new long run equilibrium. Also, whether a security is traded on multiple venues is typically not randomly assigned but may be affected by its market capitalization or other characteristics. Our empirical approach is different. We instead estimate key parameters of a model of demand for liquidity. This approach allows us to evaluate counterfactuals about market structure.

2 Model

The building block for our analysis is the demand system that governs trade flow of investors across exchanges. We first set out the trading environment and then we introduce the decision makers.

2.1 Trading Environment

Asset. There is a single asset whose fundamental value at time t is v_t . Shares of that asset are traded at one or more exchanges. Trading begins at $t = 0$, at which point the fundamental value v_0 is public information. Trading ends at $t = T$. During the interval $[0, T]$, v_t evolves as a compound Poisson jump process with arrival rate $\lambda_j \in \mathbb{R}_+$. Positive and negative jumps occur with equal probability and all have a size of $\gamma \in \mathbb{R}_+$.

For example, the asset may be a company, and the times $\{0, T\}$ may represent the dates of release of quarterly earnings reports. Jumps in v_t may represent realizations of profits, which are not made public until after the release of the next quarterly earnings report.

Limit order book (the “book”). The status quo trading environment in the model is a limit order book.⁴ At any point in time, the book is a collection of active limit orders.

In what follows, we refer to four types of orders. A *limit order* consists of (i) the number of shares desired to transact, positive if the trader wishes to sell or negative if the trader wishes to buy, (ii) a price, and (iii) a time until when the order stays in force. Limit orders, unless otherwise specified, are assumed to be “good ‘til cancelled.” An *immediate or cancel order* is a limit order with a time in force of zero. A *market order* may be thought of as an immediate or cancel order with a limit price of positive or negative infinity. A *cancellation order* instructs the exchange to remove an active order from the book.

Orders are processed sequentially, in the order they are received. In the event that two orders are received simultaneously, ties are broken at random. Incoming limit orders are processed as follows. First, it is checked whether the incoming order makes possible trade with any orders residing in the book. If so, then the order leads to an execution at the price of the order in the book. If no match is found then the order is added to the book.

The *bid* is the highest price at which there exists an offer to buy. The *ask* is the lowest price at which there exists an offer to sell. The *mid price* is the average of the bid and ask. The *spread* is the difference between the bid and ask. The spread is a measure of transaction costs, and in this model captures the welfare of ordinary traders.

2.2 Decision Makers

There are two types of traders: high-frequency traders and investors. In addition, exchanges are also strategic decision makers. All agents are risk-neutral, do not discount the future, and maximize profits.

Exchanges. There are X exchanges, each of which allows shares of the asset to be traded throughout the interval $[0, T]$. In the status quo, each exchange is organized as a separate book. We later consider alternative trading environments. Exchanges are horizontally dif-

⁴See appendix C for a more detailed description of the order book design.

ferentiated.⁵ Formally, we model this by assuming that exchange x is located at some point l_x on a circle with unit length, as in [Salop \(1979\)](#).⁶ We do not model the entry game of exchanges but solve for the equilibrium under a fixed number.

Exchange x sets a per-transaction fee, τ_x , which is collected from the passive party of each trade that occurs on that exchange. We assume that trading fees are chosen once and for all before trading commences at time zero.

Investors. Investors arrive at a Poisson rate λ_i with a desire to transact one share of the security. Investors have two dimensional types $(\tilde{l}, \tilde{\theta})$. The first component, \tilde{l} , is drawn independently and identically distributed from $U[0, 1]$ and denotes a position on the aforementioned circle. The second component, $\tilde{\theta}$, is drawn independently and identically distributed from $U[-\theta, \theta]$ and denotes a private benefit from trading a share of the asset.⁷

An investor who arrives at time t chooses an exchange $x \in \{1, \dots, X\}$ and a quantity to transact $y \in \{-1, 0, 1\}$ to maximize

$$u(y, x | \tilde{\theta}, \tilde{l}) = \begin{cases} v_t + \tilde{\theta} - a_{x,t} - \alpha \cdot d(\tilde{l}, l_x) & \text{if } y = 1 \\ b_{x,t} - v_t - \tilde{\theta} - \alpha \cdot d(\tilde{l}, l_x) & \text{if } y = -1 \\ -\alpha \cdot d(\tilde{l}, l_x) & \text{if } y = 0 \end{cases} \quad (1)$$

where $b_{x,t}$ ($a_{x,t}$) denotes the relevant bid (ask) price for selling (buying) one share at exchange x at time t . The function d yields the distance between two points on the unit circle.⁸ Moreover, α parametrizes the relative importance of the price component and the “travel cost” or the horizontal differentiation component. An investor who arrives at time t may act

⁵In practice, exchanges may differ regarding the infrastructure that they provide. Furthermore, a broker may have an ownership stake in an exchange.

⁶In the duopoly we assume that the two exchanges are not located on the same point. In the oligopoly case we assume that all exchanges are located equidistantly, i.e. that they follow maximum differentiation. Under this assumption, the existence of a Nash equilibrium of the location game, which we do not model explicitly, is well-understood ([Anderson, De Palma, and Thisse, 1992](#), Proposition 6.6).

⁷This private benefit may be thought of as coming from, for example, an idiosyncratic desire to hedge, save, or borrow. It is through this private benefit that gains from trade are realized. These traders play the role of the liquidity traders of [Glosten and Milgrom \(1985\)](#) or the noise traders of [Kyle \(1985\)](#).

⁸Formally, $d(l_1, l_2) = \min(|l_1 - l_2|, 1 - |l_1 - l_2|)$.

only at time t and is restricted to immediate or cancel orders.⁹

There are two interpretations of $u(y, x|\tilde{\theta}, \tilde{l})$. In our less preferred interpretation, u is a literal representation of the utility of an investor. That is, an investor may have an intrinsic preference for trading at one exchange over another, even at identical prices. However, in our more preferred interpretation, u is not the utility of an investor, but merely the function that investors act to maximize. In this interpretation, investors are only concerned with whether they trade and at what price, and they do not possess preferences for specific exchanges. Their utility is then u evaluated at $\alpha = 0$. That investors act to maximize something other than their utility is a reduced form for a market friction. In particular, this may be thought of as the result of an unmodeled agency problem between an investor and the broker who routes his orders to an exchange.¹⁰

High-frequency traders. There is an infinite number of high-frequency traders, each with the objective of maximizing trading profits.¹¹ They are risk neutral and there is no discounting. The action space of a high-frequency trader at any time t includes whether to submit any limit orders or cancellations.

2.3 Assumptions

We use three assumptions in deriving the results that follow. These assumptions place restrictions on the parameter space, which guarantee that the market does not break down and that the equilibrium features trading based on changes in fundamentals.

⁹The restriction of investors to immediate or cancel orders prevents them from providing liquidity and is quite standard in the literature, for example as in [Glosten and Milgrom \(1985\)](#) and [Budish, Cramton, and Shim \(2013\)](#).

¹⁰To be more precise, the location parameter \tilde{l} could be interpreted as a property of the investor's broker, which influences the broker's actions in such a way that they are not always in his client's best interest. For example, [Battalio, Corwin, and Jennings \(2013\)](#) document empirical evidence of brokers deviating from their obligation to obtain best prices for their clients to instead focus on collecting the rebates that some exchanges provide to brokers on the particular side of a trade.

¹¹In practice, the number of high-frequency traders is quite large. For example, [Baron, Brogaard, and Kirilenko \(2012\)](#) identify 65 separate high-frequency trading firms that actively trade the E-mini S&P contract in August 2010. Furthermore, since each firm may employ several different high-frequency trading algorithms, the effective number of competitors may be even higher.

Define

$$\sigma \equiv \begin{cases} \theta \left(1 + \frac{\lambda_j}{\lambda_i}\right) & \text{if } X = 1 \\ \theta + \frac{2}{X}\alpha - \sqrt{\theta^2 + \alpha^2 \frac{4}{X^2} - 4\alpha\theta \frac{\lambda_j}{\lambda_i}} & \text{if } X \geq 2 \end{cases} \quad (2)$$

Assumption 1 (investor participation). $\sigma \leq 2\theta$.

Assumption 2 (scalper participation). $\sigma \leq 2\gamma$.

Assumption 3 (exchange participation). $\lambda_i \left(1 - \frac{1}{\theta} \frac{\sigma}{2}\right) \frac{\sigma}{2} - \lambda_j X \left(\gamma - \frac{\sigma}{2}\right) \geq 0$.

Assumption 1 ensures that the spread is not so large that it crowds out all trades by investors whose private transaction motives are bounded by θ . If this assumption were violated, then the market would shut down due to adverse selection, since only informed trades would occur. Therefore, this is a technical assumption and not likely to bind in practice.

Assumption 2 ensures that trades following a change in the pricing benchmark occur in equilibrium. If this assumption were violated, then the liquidity provider would not face adverse selection risk. The risk of trading at a loss with an informed party is a pertinent feature of financial markets, which provides a motivation for this assumption.

Assumption 3 ensures that exchanges earn nonnegative equilibrium profits, and therefore have no incentive to shut down.

3 Limit Order Book Equilibrium

In this section, we study the case in which each exchange is organized as a limit order book. We describe Nash equilibrium trading behavior in this environment, characterize equilibrium outcomes, and we discuss how these outcomes depend on the parameters of the model.

3.1 Equilibrium

In this section, we demonstrate the existence of equilibria in which various numbers of exchanges each operate a separate order book. The equilibrium depends upon the number of

exchanges in the economy. Theorem 1 characterizes the equilibrium spread for the case of a monopoly, and theorem 2 does the same for an oligopoly.

Theorem 1 (Monopoly). *With a single exchange ($X = 1$), under assumptions 1, 2 and 3, there exists a Nash equilibrium of the limit order book design with spread*

$$s_{LOB}^* = \theta \left(1 + \frac{\lambda_j}{\lambda_i} \right). \quad (3)$$

Theorem 2 (Oligopoly). *With multiple exchanges ($X \geq 2$), under assumptions 1, 2 and 3, there exists a Nash equilibrium of the limit order book design with spread*

$$s_{LOB}^* = \frac{(X\theta + 2\alpha)\lambda_i - \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}}{X\lambda_i}. \quad (4)$$

All proofs are deferred to appendix B. While complete descriptions of the strategies used in these equilibria are provided in the proofs of these results, we provide an intuitive description of these strategies here.

Investors submit orders to buy or sell in correspondence with their types. Upon arrival they choose an exchange as well as whether to buy, sell, or hold. Separate high-frequency traders play the roles of “liquidity provider” at each exchange. Each liquidity provider maintains quotes of one unit at the bid and one unit at the ask. They set mid prices equal to the fundamental value of the asset, and they set spreads to satisfy a zero-profit condition. The remaining high-frequency traders play the role of “stale-quote scalpers,” attempting to trade whenever a jump in the value of the asset generates a mispricing in the quotes of the liquidity provider.¹² Formally, the liquidity provider ties in a race to react on information with an infinite number of scalpers, which the scalpers as a sector always win.¹³ Finally, each exchange sets a transaction fee to maximize profits, taking into account the behavior of the traders and, in the case of oligopoly, competition from other exchanges.

¹²BCS refer to these agents as “snipers.” We depart from their terminology in order to reflect more closely the language used by industry participants.

¹³This can be thought of the limit of a process where agents face random latency when communicating with the exchange. Provided that the liquidity provider loses the race to adjust quotes at least some of the time, then this leads to some amount of loss-making trades from the perspective of the liquidity provider.

As in BCS, free entry into high-frequency trading leads us to focus on equilibria in which the liquidity provider earns zero profits in expectation.¹⁴ At any instant, one of two things may affect the profits of a liquidity provider: the value of the asset may jump or an investor may arrive. The arrival rate of jumps is λ_j . Conditional on a jump occurring, the liquidity provider at exchange x will lose $\gamma - s_x/2$ to the stale-quote scalper and must pay the transaction fee τ_x to the exchange. Note that assumption 2 guarantees that scalpers make nonnegative profits in aggregate. On the other hand, the arrival rate of investors is λ_i . In the case of an oligopoly, an exchange x is the preferred exchange of an investor with probability $(s_{-x} - s_x)/(2\alpha) + 1/X$ when the spreads are s_x on exchange x and s_{-x} on the other exchanges. In the case of a monopoly, the monopolist exchange is always the preferred exchange of an investor. Conditional on exchange x being the preferred exchange of an investor, that investor trades with probability $1 - s_x/(2\theta)$. Note that by assumption 1 this probability is nonnegative at the equilibrium spread. Conditional on the investor trading, the liquidity provider earns the half-spread, $s_x/2$, and must pay the transaction fee τ_x to the exchange. The zero profit condition of a liquidity provider is then

$$\lambda_i \left(1 - \frac{1}{\theta} \frac{s_x}{2}\right) \left(\frac{s_x}{2} - \tau_x\right) - \lambda_j \left(\gamma - \frac{s_x}{2} + \tau_x\right) = 0 \quad (5)$$

in the case of a monopoly, and is

$$\lambda_i \left[\frac{1}{\alpha} \left(\frac{s_{-x}}{2} - \frac{s_x}{2}\right) + \frac{1}{X} \right] \left(1 - \frac{1}{\theta} \frac{s_x}{2}\right) \left(\frac{s_x}{2} - \tau_x\right) - \lambda_j \left(\gamma - \frac{s_x}{2} + \tau_x\right) = 0 \quad (6)$$

in the case of an oligopoly. Conditional on exchange x setting the transaction fee τ_x , the liquidity provider on exchange x sets a spread s_x to satisfy the appropriate zero profit con-

¹⁴GETCO (KCG since its merger with Knight Capital Group in 2013) is a representative, significant global player in high-frequency trading and in market making of equities. Moreover, until recently it was the only such firm to be publicly traded and therefore the only such firm for which annual SEC filings are available. Its 2013 Form S-4 filing with the SEC reveals that its net income decreased by 41.9 percent from \$232.0 million in 2007 to \$167.2 million in 2011 (KCG, 2013, p. 31). For Q2 2013, its market making division even posted a loss of \$1.9 million compared to a profit of 9.3 million in the previous year (KCG, 2013, Exhibit 99.2, p. 8). To the extent that excessive profits accrued to high-frequency traders during the previous decade, they were short-lived.

dition. Exchange x takes this behavior as given, and sets a transaction fee τ_x to maximize its profits, which are the product of τ_x and the volume traded. The resulting equilibrium spread is as described in theorem 1 for the case of a monopoly. For the case of an oligopoly, we focus on symmetric equilibria, in which the same spread prevails at each exchange. The resulting equilibrium spread is as described in theorem 2.

Two forces give rise to an equilibrium spread in our model, both of which are illustrated by the expression for the monopoly spread given in theorem 1. First, since a monopolist sets prices according to own-price elasticity of demand, the spread is a function of the investor’s private willingness to transact, θ . Indeed in the absence of adverse selection (i.e. with $\lambda_j = 0$), the pricing equation follows the classic Lerner condition. Second, the relative flow of information to investor arrivals, λ_j/λ_i , governs the extent of adverse selection that a liquidity provider faces.

3.2 The Effect of Exchange Competition

A key insight formalized by this model is that the welfare consequences of the number of exchanges are ambiguous. The ambiguity is caused by two opposing channels. On one hand, the addition of another exchange may reduce spreads through the “competition channel.” Intuitively, exchanges have less market power when they have more competitors and must reduce their transaction fees to retain investors. Lower fees are passed on as lower spreads. However, the addition of another exchange may raise spreads through the “exposure channel.” Intuitively, more shares are quoted in aggregate. Therefore, whenever the fundamental value of the asset moves away from the current posted prices, more shares are exposed to that mispricing, which creates larger losses for liquidity providers. Liquidity provision therefore becomes more risky and induces higher spreads in response.

The ambiguity may be illustrated by two limiting cases of the model. First, consider the limiting case as α diverges to infinity, which is to say that investors do not condition their choice of exchange on the price difference. In that case, the expression for the oligopoly spread converges to $s_{LOB}^* = \theta (1 + X\lambda_j/\lambda_i)$. Thus, every additional exchange raises the spread

by $\theta\lambda_j/\lambda_i$. The reason is that if investors do not respond to prices, then multiple exchanges are a collection of isolated monopolists. Yet scalpers possess more opportunities to trade on a given piece of information, which increases adverse selection. Intuitively, the competition channel is shut down, so that the exposure channel dominates.

Second, consider the case in which $\lambda_j = 0$, which is to say that the fundamental asset value is constant. In that case, the monopoly spread is θ , and the duopoly spread is $\theta + \alpha - \sqrt{\theta^2 + \alpha^2}$. Thus, the monopoly spread exceeds the duopoly spread.¹⁵ The reason is that adverse selection does not increase with the number of exchanges, as with a constant asset value there is no adverse selection. Yet price competition is intensified, resulting in smaller transaction fees and hence smaller spreads. Intuitively, the exposure channel is shut down, so that the competition channel dominates.

3.3 Comparative Statics

In this section we use the characterization of equilibrium outcomes from the previous section to study how these outcomes vary with respect to the primitives: α , the willingness of investors to substitute between exchanges, θ , the extent of their private transaction motive, λ_i , their arrival rate, and λ_j , the arrival rate of information.

Theorem 3 (Comparative Statics). *Within the set of parameters that satisfy assumptions 1, 2 and 3, the equilibrium spread of the limit order book design is*

- (i) *nonincreasing in λ_i and*
- (ii) *nondecreasing in λ_j , α , and θ .*

The parameter α determines travel costs and governs the cross-price elasticity of investors. It therefore determines the magnitude of the “competition channel.” When α is large, travel costs are high, which mutes price competition and raises spreads. On the other hand, when α is small, price competition is strong and spreads are lower.

¹⁵Furthermore, the equilibrium spread is also decreasing in the number of exchanges within the oligopoly case. With $\lambda_j = 0$, the oligopoly spread is $\theta + \frac{2\alpha - \sqrt{\theta^2 X^2 + 4\alpha^2}}{X}$, which is decreasing in X .

The intuition for the comparative statics with respect to the arrivals of investors and information, i.e. λ_i and λ_j , can be understood through the liquidity provider’s problem. If investors arrive more frequently (increase in λ_i), then the liquidity provider faces less adverse selection, since she trades with relatively more investors and relatively fewer stale-quote scalpers. She therefore demands a smaller spread. On the other hand, if trades based on changes in the fundamental value occur more frequently (increase in λ_j), then she faces more adverse selection, since she trades with relatively fewer investors and relatively more stale-quote scalpers. She therefore demands a larger spread.

The parameter θ governs the own-price elasticity of investor demand. When θ is large, investors are quite inelastic. Exchanges can therefore afford to charge larger transaction fees, which induces larger spreads. On the other hand, when θ is small, investors are quite elastic. Exchanges must therefore charge smaller transaction fees, which are passed on as smaller spreads.

3.4 Welfare of Investors, Traders, and Exchanges

In this section we present the functions that measure the welfare of the agents in the model. We use them in section 5 to compare and evaluate counterfactuals of the estimated model. The gains from trade stem from the investors’ private willingness to transact. Therefore, in the model an increase in the bid-ask spread has two welfare consequences: (i) gains from trade are reduced since investors may not trade, and (ii) they are transfers away from the investors who do trade.

First, we consider the utility of investors. As discussed in section 2, there are two possible ways to define the utility of investors, depending on whether travel costs are viewed as a part of utility or simply as a way to generate a market friction, which may be the result of an agency problem between an investor and his broker. In the case when travel costs do enter the utility of investors, the flow utility of the investor sector in the equilibria described in

theorems 1 and 2 depends on the spread and is

$$2\lambda_i \int_0^1 \int_{\frac{s_{LOB}^*}{2}}^{\theta} \left[\tilde{\theta} - \frac{s_{LOB}^*}{2} \right] \frac{1}{2\theta} d\tilde{\theta} d\tilde{l} = \lambda_i \frac{(2\theta - s_{LOB}^*)^2}{8\theta}, \quad (7)$$

which is decreasing in s_{LOB}^* . In the case when travel costs do enter the utility of investors, then utility of investors is given by the previous expression minus $\frac{\lambda_i \alpha}{4X}$, the flow rate of travel costs.

Second, while each high-frequency trader earns zero profits in equilibrium, there are an infinite number of them, and they earn positive profits as a sector. Following every jump in the value of the underlying asset, one high-frequency trader gets to transact against the stale quote on each exchange. Each of these trades yields a profit of the size of the jump minus the half-spread. The flow utility of the high-frequency trading sector in the equilibria described in theorems 1 and 2 is

$$X\lambda_j \left(\gamma - \frac{s_{LOB}^*}{2} \right). \quad (8)$$

Third, the total utility is given by

$$2\lambda_i \int_0^1 \int_{\frac{s_{LOB}^*}{2}}^{\theta} \frac{\tilde{\theta}}{2\theta} d\tilde{\theta} d\tilde{l} = \lambda_i \frac{4\theta^2 - (s_{LOB}^*)^2}{8\theta}. \quad (9)$$

As above, in the case when travel costs do enter the utility of investors, then total utility is given by the previous expression minus $\frac{\lambda_i \alpha}{4X}$, the total travel cost incurred. From this equation it is clear that total welfare is higher under lower spreads.

Finally, the flow utility of the exchange sector in the equilibria described in theorems 1 and 2 can be obtained as the per-transaction fee times the number of shares traded. More conveniently, this expression is equivalent to the difference between the total flow utility and the sum of investor flow utility and high-frequency trading flow utility, which yields

$$\lambda_i \frac{s_{LOB}^*(2\theta - s_{LOB}^*)}{4\theta} - X\lambda_j \left(\gamma - \frac{s_{LOB}^*}{2} \right). \quad (10)$$

4 Empirical Analysis

In this section we estimate the model using data from Australia. We proceed by describing the industry background and then discuss the order-level data from all Australian exchanges. Next, we introduce the empirical strategy and identification. Finally, we discuss the results from GMM estimation.

4.1 Industry Background

Our empirical analysis focuses on Australia. The public equity trading landscape in Australia is broadly similar to the United States and, in particular, has seen a comparable, albeit less pronounced, shift toward fragmentation. In many cases the same large trading firms are active in Australia, and they use identical trading technology as they do elsewhere. The market participants include banks such as Citigroup, Bank of America Merrill Lynch, and Goldman Sachs, electronic trading firms and hedge funds such as GETCO and Citadel, as well as retail brokers such as E*trade and Interactive Brokers. Furthermore, the technical protocol that is used by Australian exchanges is owned by Nasdaq OMX Group and is effectively the same as that used on Nasdaq.

There are two formal exchanges currently active in Australia: the Australian Securities Exchange (ASX) is the incumbent, and Chi-X Australia (Chi-X) is a competitor who entered in October 2011. The share of volume traded at Chi-X amounts to 17.2 percent across all securities during the first half of 2014.¹⁶

For reasons of measurement, Australia is a natural environment on which to focus. In particular, data is available on almost the entire universe of trading in Australia. Of the total volume of shares traded, 78.7 percent are “lit” and occur in the limit order books of either ASX or Chi-X.¹⁷ Furthermore, the security we study is only traded on these two exchanges.

¹⁶For the security we study, the average daily Chi-X share in the first half of 2014 is 23.1 percent.

¹⁷For the security we study, on average 87.3 percent of the volume was traded in the limit order books of either ASX or Chi-X. For comparison, for a comparable security in the US, e.g. the S&P 500 ETF, trades take place on more than 40 different venues.

4.2 Data

This section documents the datasets and variables that are used for the empirical investigation. We proceed in three steps, describing (i) the raw order-level data, (ii) the reconstruction of the limit order books in continuous time, and (iii) the construction of the analytic dataset that is used for estimation.

4.2.1 Order-Level Data

The starting point of our empirical investigation is a complete record of messages that are broadcast by ASX and Chi-X as publicly available data feeds, which market participants can access in real time for a fee.¹⁸ These messages contain pertinent information about the state of the limit order books at ASX and Chi-X for every listed security. Specifically, a message is broadcast to notify market participants about every order that alters the order book.¹⁹ Messages that affect the book are new add orders, cancellations, and executions of existing orders.

Starting from a chronological record of all messages, we isolate all messages pertaining to the exchange-traded fund STW, which aims at replicating the Australian market index S&P/ASX 200. In appendix D we document the details about the data and the specific steps taken for message parsing. This security is of broad interest for two reasons. First, STW is a highly liquid ETF that replicates a basket of 200 constituents, which account for approximately 80 percent of Australian equity market capitalization. The current market capitalization of the fund is AUD 2.45 billion (SPDR, 2014). Therefore, this security is representative of a considerable part of trading in Australia. Second, the bid-ask spread of STW is not typically constrained by the minimum tick size of 1 cent, as is the case for many other thickly-traded securities.²⁰

Table 1 shows the distribution of messages that affect the order books of STW at ASX and

¹⁸These broadcasts are called “ITCH – Glimpse” and “Chi-X MD Feed” at ASX and Chi-X respectively.

¹⁹There are also a number of other messages that relate to system events and the opening and closing auctions, which we do not use for this paper.

²⁰During instances when the minimum tick size is binding, the first order conditions that stem from the solution to our model, do not hold.

Chi-X. Two aspects of these data merit mention. First, only a small fraction of messages are related to executions, 1.93 percent at ASX and 0.44 percent at Chi-X. The remainder divides almost equally in add orders or cancellations of active orders.²¹ Second, the order flow at the two trading venues is similar. On a typical day, trading in STW generates 14,596 messages at ASX compared to 14,447 messages at Chi-X. The difference between executions at the two venues points to a disagreement of model and reality. The equilibrium we study is fully symmetric with regards to spreads, order flow, and trade flow. However, in reality spreads and order flow exhibit a greater degree of symmetry than trade flow. We view our model as a useful instrument to inform the price setting in financial markets and less well-suited to inform trade volumes.

Table 1: Messages affecting the limit order book

message types	ASX		Chi-X	
	<i>N</i>	%	<i>N</i>	%
add	550,151	49.60	546,460	49.77
cancel	537,736	48.48	546,660	49.79
execution	21,384	1.93	4,878	0.44
total	1,109,271	100.00	1,097,998	100.00

Distribution of messages that affect the state of the limit order book of SPDR S&P/ASX 200 FUND (STW). Based on ASX ITCH – Glimpse and Chi-X MD feed data. Sample period: 10:30 – 16:00 for 76 trading days between Feb 3, 2014 and May 30, 2014.

4.2.2 Continuous Time Limit Order Book

We then proceed to reconstruct the order books for STW at each of the two exchanges.²² Our reconstruction algorithm replicates the matching processes used by the exchanges. At each exchange it involves the following steps. All messages are processed in chronological order. When an add order arrives, it is added to the book at the limit price that it specifies. In case of a cancellation, the active order in question is removed. Finally, in the event of

²¹Cancellations and executions do not sum to the number of add orders due to the possibility of add and cancel orders outside of the sampling frame between 10:30 and 16:00 on a trading day.

²²Since the book at any moment is a cumulative object based on orders that were processed on that day, we start the reconstruction when the market opens. We later limit the dataset to messages that lie in the 10:30 – 16:00 interval. The continuous trading session for STW starts at a random point on the interval [9:08:45, 10:09:15], when ASX calculates and announces the opening price.

an execution, the affected order is removed or its quantity is adjusted.²³ In appendix D we describe the steps of constructing the analytic dataset in detail.

4.2.3 Discretization and Variable Construction

For the estimation we discretize time into intervals of length of one second. We define variables pertaining to the prices prevailing in an interval, as well as whether certain types of transactions occur.

Prices. Based on the two order books we construct a time series of bid and ask prices, from which we also compute a time series of bid-ask spreads for each exchange. In the event of a price change during an interval, we use the value prevailing at the beginning of that interval.

Measuring uninformed trades. Motivated by the equilibrium behavior of the traders in the model, we define investor trades as trades that happen in isolation from others. Specifically, a trade is termed isolated when no other trade occurs within ω duration on either exchange.²⁴ We define the indicator $\mathbb{1}\{isolated\ trade_t\}$, which evaluates to unity if an isolated transaction, either to buy or sell against a standing order, occurred on ASX or Chi-X in interval t and zero otherwise. In the baseline specification, we set $\omega = 1$. In appendix E, we demonstrate that our results are robust to the choice of ω .

Measuring informed trades. In the model, informed trades occur after every change in the fundamental asset value, and against all available mispriced quotes. Motivated by this feature of equilibrium behavior, we define an empirical measure of informed trades based on the clustering of trades, both across venues and time.²⁵ A trade is classified as clustered

²³Suppose that an active order at the ask specifies 100 shares and a buy order for 60 shares is executed against it. Then the active order remains with an updated quantity of 40 shares.

²⁴Technically, a single marketable limit order can lead to multiple execution messages, albeit with identical time stamps, which we count as one execution in our analysis. Specifically, if an order to buy is large enough to trigger a trade against two or more standing limit orders to sell, then a separate execution message is broadcast for each match. These messages (i) appear in consecutive order, and (ii) all have the same time stamp.

²⁵This definition of informed and uninformed trades relies on knowledge of the distribution of other orders arriving at all exchanges. In Baldauf and Mollner (2015b) we use a different approach. There, we use knowledge of the identity of market participants to classify them as informed and able to react to news quickly.

if it occurs within ω of another trade at either ASX or Chi-X. We define the indicator $\mathbb{1}\{clustered\ trade_t\}$, which evaluates to unity if a clustered trade occurred on ASX or Chi-X in interval t and zero otherwise. As before, we set $\omega = 1$ in the baseline specification.

Table 2 shows summary statistics for four variables: the indicators for isolated and clustered trades, as well as the spreads at ASX and Chi-X. For each variable we report means and standard deviations for the full sample that comprises the trading hours from 10:30am until 4:00pm of each of the 76 trading days in the sample. The restricted sample consists of those seconds for which the quotes at both exchanges during an interval are identical, which is the case 30.7 percent of the time. For those observations, there is no difference in the implied mid prices at ASX and Chi-X. For that reason, this is the sample that is used for estimation. An isolated trade occurs in 0.73 percent of the seconds in the full sample. Isolated trades are slightly more frequent in the restricted sample and occur in 0.75 percent of seconds. Clustered trades occur on average in 0.17 percent of seconds in the full and 0.15 percent of seconds in the restricted sample.

Table 2: Summary statistics

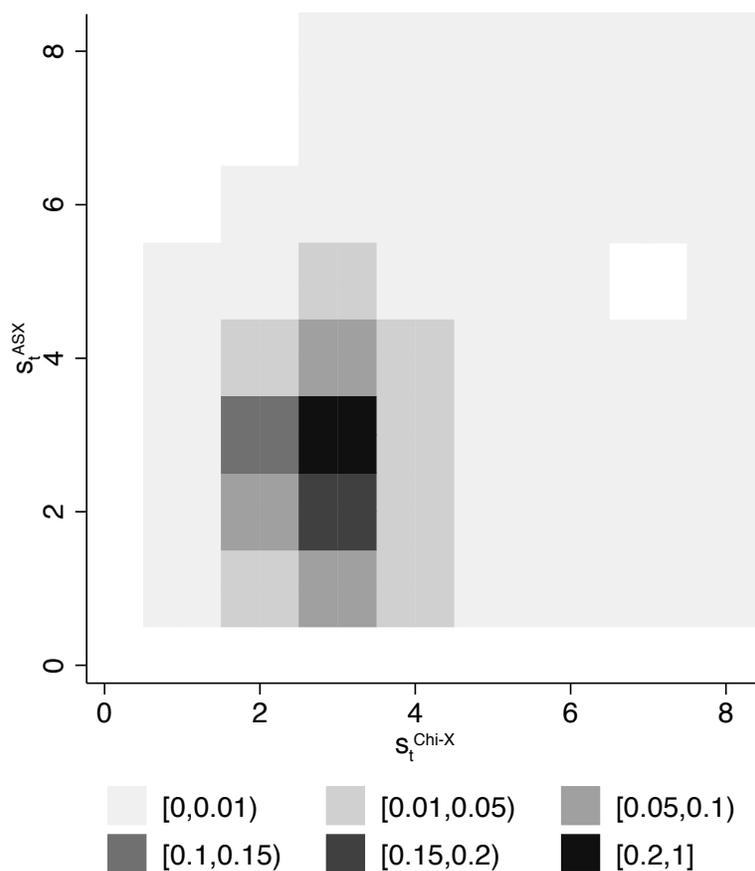
	full		restricted	
	Mean	Std. Dev.	Mean	Std. Dev.
$\mathbb{1}\{isolated\ trade\}$	0.007336	0.08541	0.00753	0.08645
$\mathbb{1}\{clustered\ trade\}$	0.001737	0.04164	0.001548	0.03931
$spread^{ASX}$	2.532	1.125	2.917	0.6767
$spread^{CHIX}$	2.784	0.7055	2.917	0.6767
Observations	1,504,724		461,875	

An observation is one second between 10:30 and 16:00 on one of the 76 trading days in the sample. The full sample includes all such seconds. The restricted sample includes only seconds during which both the bid and ask prices at ASX and Chi-X are equal. $\mathbb{1}\{isolated\ trade\}$ evaluates to unity for a second during which a trade happened conditional on no other trade happening within a second on either exchange. $\mathbb{1}\{clustered\ trade\}$ evaluates to unity for seconds during which a trade happens and a second trade happens within one second on either exchange. Spreads are measured in cents and are evaluated at the start of an interval.

Next, we turn to the distribution of bid-ask spreads at the two exchanges. In the restricted sample, the spread at the two exchanges is on average 2.9 cents with a standard deviation of 0.9 cents. This compares to 2.5 and 2.8 cents at ASX and Chi-X in the full sample. Standard

errors around these averages are 1.1 and 0.7 cents respectively. Figure 1 shows the joint density plot of the spreads at ASX and at Chi-X. The unique mode is given by a symmetric spread of three cents at both exchanges, which occurs 22.1 percent of the time. Furthermore, the spreads at both exchanges are equal 36.8 percent of the time and they differ by at most one cent in 81.5 percent of the time.

Figure 1: Joint density of spreads at Chi-X and ASX



An observation is one second between 10:30 and 16:00 in one of the 76 trading days in the sample. Each cell refers to a pair $(s_t^{\text{ASX}}, s_t^{\text{Chi-X}})$. Spreads are measured in AUD cents. The shading refers to the fraction of seconds that a pair of spreads is observed in the sample.

4.3 Empirical Strategy

In this section we show how the observed variation in the data is used to estimate our model. The model has four parameters that require estimation.²⁶ Three of them are primitives that govern the choice problem of investors: the willingness to substitute between exchanges, α , the extent of the private transaction motive, θ , and the arrival rate of investors, λ_i . The fourth parameter is λ_j , the arrival rate of jumps in the fundamental asset value.

In what follows we show that the parameters are uniquely identified by the variation in spreads and the occurrences of isolated and clustered trades. Intuitively, the identification argument relies on three parts. First, the arrival rate of jumps, λ_j , is related to our measure of clustered trades. Second, the arrival rate of isolated trades, in conjunction with variation in the spread, pins down λ_i and θ . In addition, we present reduced-form evidence about how spreads affect the occurrence of an isolated trade in appendix F. Finally, the level of the spread is a function of all four parameters as shown in theorem 2, and so it pins down α .

For the estimation we use the restricted sample, in which the two bid prices are equal and the two ask prices are also equal, since it does not introduce an ambiguity about which mid price corresponds to the fundamental asset value, v_t . The demand of investors in that case takes the form

$$\mathbb{1}\{isolated\ trade_t\} = \lambda_i \max\left(0, 1 - \frac{s_t}{2\theta}\right) + \varepsilon_t \quad (11)$$

where $\mathbb{1}\{isolated\ trade_t\}$ is an indicator for an isolated trade occurring in interval t on either exchange, and s_t is a measure of the prevailing spread at the beginning of interval t . Furthermore, ε_t is an error term that is uncorrelated with s_t and with zero expectation. In the model λ_i is the intensity of a Poisson process and the error ε_t captures deviations of this random process away from its mean.

²⁶There is a fifth parameter, γ , the size of the jumps in the stochastic process that governs the evolution of the asset value. However, for the policy counterfactuals that we consider, it is not necessary to estimate this parameter.

Equation (11) gives rise to two moment conditions, which identify λ_i and θ .

$$\mathbb{E} \left[\frac{\partial \varepsilon_t^2}{\partial \lambda_i} \right] = \mathbb{E} \left[-2\varepsilon_t \max \left(0, 1 - \frac{s_t}{2\theta} \right) \right] = 0 \quad (\text{M1})$$

$$\mathbb{E} \left[\frac{\partial \varepsilon_t^2}{\partial \theta} \right] = \mathbb{E} \left[\mathbb{1} \left\{ 1 - \frac{s_t}{2\theta} > 0 \right\} \varepsilon_t \left(-\frac{\lambda_i s_t}{\theta^2} \right) \right] = 0 \quad (\text{M2})$$

Thus, variation in the participation of investors as a function of the spread pins down their arrival rate and the distribution of the private willingness to transact.

Next, the arrival rate of informed trades is given by

$$\mathbb{1}\{\text{clustered trade}_t\} = \lambda_j + \nu_t \quad (\text{12})$$

where $\mathbb{1}\{\text{clustered trade}_t\}$ is an indicator for a clustered trade occurring in interval t , and ν_t is a zero expectation error term which implies the following moment condition. In the model, jumps follow a Poisson process with intensity λ_j and the error ν_t captures deviations of this random process away from its mean.

$$\mathbb{E}[\nu_t] = 0 \quad (\text{M3})$$

Finally, the expression for the spread under a duopoly gives rise to

$$s_t = \theta + \alpha - \sqrt{\theta^2 + \alpha^2 - 4\theta\alpha \frac{\lambda_j}{\lambda_i}} + \eta_t \quad (\text{13})$$

where η_t is zero expectation error term that is uncorrelated from other error terms. The final moment condition is thus

$$\mathbb{E}[\eta_t] = 0 \quad (\text{M4})$$

Note that the model does not suggest a reason for why the equation for the spread should contain an error term. However, in the data, the spreads are not constant, yet are most of the

time either 2 or 3 cents. There are a number of reasons that can explain short-term deviations from this long run pricing equation. First, we have assumed that the parameters of the model are constant over time. While this seems accurate as a first approximation, small deviations may arise in practice, which would give rise to different values of the spread. For example, days on which macroeconomic news announcements are expected would be associated with larger values of λ_j and γ .²⁷ Second, in the model it is assumed that all agents are risk-neutral. In practice, it is likely that high-frequency traders face constraints on their inventory and may therefore adjust quoted spreads as these constraints become more or less binding.²⁸

4.4 Parameter Estimates

We estimate the parameters by GMM, minimizing the quadratic form based on the four moment conditions (M1), (M2), (M3), and (M4). In this section we report the main estimation results. Alternative specifications for robustness are provided in appendix E.

Table 3 contains the parameter estimates. The interpretation of the point estimates is as follows. First, the estimate for θ of 1.6 cents points to a relatively flat schedule for the investor demand to trade STW. This suggests that investors would divert to investment alternatives, even for small changes in the spread. Second, the point estimate for α of 11.1 cents implies that investors act as though the value of the difference between the best and worst trading conditions, holding prices constant, amounts to 5.6 cents, or 1.9 times the average spread of 2.9 cents.

To illustrate the relative magnitude of the own-price and the cross-price channel of the order flow from investors at these estimates, consider a decrease in the spread at one exchange by 5 percent from a starting point of equal spreads at 2 cents. The overall investor flow at that exchange increases by 9.9 percent, which can be decomposed into the own-price effect

²⁷On such days liquidity providers would charge a larger spread. We show how liquidity providers change their behavior following unanticipated news in Baldauf and Mollner (2015b). There, we focus on a few minutes of trading in the immediate aftermath of the announcement of a terrorist attack, a more volatile time period compared to the trading day up to the announcement. We find that, in the aftermath of the news arrival, spreads increased compared to their levels before the event.

²⁸A recent example that illustrates the significance of capital constraints is the SEC’s decision to fine Latour Trading LLC USD 16 million for violation of the net capital rule of the Exchange Act, which stipulates that every broker-dealer must maintain a specified minimum level of net liquid assets (SEC, 2014).

(+9.0 percent) and the substitution effect (+0.9 percent).²⁹

The point estimates for the arrival rates of investors and changes in the fundamental asset value are 0.0052 and 0.0023 per second, respectively. The ratio of the arrival rates of scalpers to investors amounts to 0.44. All estimated parameters are highly significant based on bootstrapped standard errors.

Table 3: GMM estimates

parameter	point estimate	standard error
α	11.0683	1.0952
θ	1.5582	0.0078
λ_i	0.0052	0.0002
λ_j	0.0023	0.0001

The point estimates are determined by minimizing the quadratic form based on the four moment conditions that are defined in the previous section. The sample is constructed from the continuous trading session of all trading days in our data, between 10:30-16:00. Each trading day is divided into one second increments. Estimation is based on the restricted sample of intervals during which the quoted bid and ask prices at ASX and Chi-X were the same. The estimation was performed using SNOPT (Gill, Murray, and Saunders, 2008). Standard errors are based on 500 bootstrap replications.

The parameter estimates, in the context of this model, place bounds on the jump size of the fundamental value, $\hat{\gamma} \in [1.45, 1.55]$. The lower bound is given by the assumption that informed trades occur following every jump in the fundamental value (assumption 2). The upper bound is given by the participation constraints of exchanges (assumption 3).

To evaluate whether the estimated model fits the data well we compare model predictions to moments in the data that were not used for the estimation. First, the model makes a clear prediction about the magnitude of the transaction fee in equilibrium, which we derive in appendix B.1.2. Based on the parameter estimates, together with the aforementioned bounds on γ , the predicted ratio of τ/s is in the range $[0, 0.031]$. Empirically, for the first half of

²⁹We compare the investor trades of exchange A following a change of the spread from s to s' while holding the spread at exchange B constant at s as follows. Before the price change, the number of investor trades at A is given by $\lambda_i \left(\frac{1}{2}\right) \left(1 - \frac{s}{2\theta}\right)$. After the price change, the number of investor trades at A is given by $\lambda_i \left(\frac{1}{2} + \frac{s-s'}{2\alpha}\right) \left(1 - \frac{s'}{2\theta}\right)$. The change in the third term of this multiplication is what we label “own-price effect” and the change in the second term we label “substitution effect.”

2014, the corresponding ratios amount to 0.052 and 0.031, for ASX and Chi-X respectively. Our model is thus able to explain the relatively low transaction fees that are observed in this market.

Second, the model also predicts the volatility of the fundamental asset value. For the range of jump sizes that are implied by the model, we compute that the predicted squared daily price movement lies in the range of $[507.65, 575.65]$ cents squared.³⁰ Empirically, for the first half of 2014, the average squared first difference in the closing prices of STW amounts to 983.77 cents squared. The volatility of prices observed in the data is therefore larger than that predicted by the model. This may be a result of the simplified way in which price movements enter the model. In the model, every change in the value of the asset is large enough that sniping is profitable. However, in practice some information may not be sufficiently large to introduce a profitable trading opportunity. One way to incorporate this into the model would be to allow information to accrue in two sizes: small jumps of size γ_1 and large jumps of size γ_2 . If small jumps are too small to trigger any arbitrage trades, then liquidity providers can safely update quotes without the risk of being adversely selected. This extra degree of freedom would allow us to match the price volatility, yet would leave the other results unchanged.

5 Counterfactuals

In this section we use the estimates from section 4.4 to evaluate the following counterfactuals within the model. First, we vary the number of exchanges in operation, while maintaining the current limit order book design. Second, we consider an alternative market design. Third, we evaluate the consequences of eliminating off-exchange, “dark” trades.

³⁰The assumption that a compound Poisson jump process governs the asset value evolution implies that the expected value of the square of the difference in prices over an interval of length δ takes the form $\mathbb{E}[(\Delta v)^2] = \gamma^2 \lambda_j \delta$, where Δv and λ_j denote price difference and arrival rate of jumps during that interval.

5.1 The Effect of Competition with Order Books

At the moment, the market structure in Australia is given by an exchange duopoly, in which each market operates a separate order book. In our model it is theoretically ambiguous whether competition benefits investors. The reason for that is that the competition channel – price competition among exchanges – and the exposure channel – increased riskiness of liquidity provision with multiple exchanges – act in opposite directions. We use the estimates from the previous section to investigate which channel dominates in the case of STW.

The results from evaluating the expressions for the monopoly and oligopoly spreads at the estimated parameter values are reported in the first row of table 4. In the case of a monopoly exchange, we estimate the average spread to decrease by 23 percent, from 2.92 to 2.25 cents. The corresponding welfare change represents a four-fold increase compared to the prevailing duopoly (table 5, row 1). Based on bootstrapped standard errors, both differences are highly significant. Note that there does not exist a symmetric equilibrium in which three exchanges operate that satisfies the assumptions of our model.

These findings show that the competition channel is dominated by the exposure channel.

5.2 Alternative Trading Mechanisms

A current debate among policy makers, industry participants, and researchers is concerned with whether alternative trading mechanisms can improve upon the ubiquitous limit order book. In this section we propose a mechanism, which we call a selective delay, in which certain orders would be processed immediately, while other orders would be processed only after a small delay.³¹ This is in contrast to a limit order book, in which orders are processed in the order received. The benefits of a delay in processing certain orders have implicitly been recognized by industry participants, yet, to our knowledge, we are the first to study this mechanism in the literature.³² Our model predicts that this mechanism would implement

³¹The selective delay mechanism is also considered in [Baldauf and Mollner \(2015a\)](#), where we show that it also performs well in a slightly different setting, in which information arrives privately rather than publicly as it does here.

³²Several industry participants have advocated for similar types of delays. For example, Aequitas Innovations, which is planning to enter as a stock exchange serving the Canadian market, is considering a delay

a lower spread than the limit order book. Furthermore, we use our empirical estimates to quantify the extent of this improvement. We also show in appendix A.3 that in our model the same outcome could also be achieved through the use of frequent batch auctions, which are a proposal that have received a great deal of recent attention, notably from BCS.³³ However, for a number of reasons, which we discuss in appendix A.4, we believe that selective delay is a less intrusive change from the current limit order book design.

The specific proposal that we consider in this section is the following. Exchanges would process cancellations without delay. However, all other orders would be processed only after a small delay. See appendix A.2 for the formal definition of what constitutes a small delay. In practice, the length of this delay should exceed the maximum difference in reaction time that may occur between two high-frequency traders responding to the same event.³⁴

The intuition for why this proposal would improve outcomes is the following. Trading in limit order books is based on strict price and time priority. We have shown in section 3 that this can introduce an adverse selection risk, even when information arrival is exogenous and public. The small delays in the processing of non-cancellation orders allow liquidity providers to update their mispriced quotes before stale-quote scalpers can trade against those quotes, which eliminates this adverse selection and thereby reduces the spread. Theorems 4 and 5 characterize the equilibrium spreads that prevail under a selective delay.

Theorem 4 (Monopoly). *With a single exchange ($X = 1$), there exists a Nash equilibrium of the selective delay design with spread*

$$s_{SD}^* = \theta. \tag{14}$$

of randomized duration of between 3 and 9 milliseconds (Aequitas, 2013). Similarly, the incumbent, TMX Group, has recently announced similar plans for one of their platforms, the Alpha Exchange. They are considering a delay of randomized duration of between 5 and 25 milliseconds (Alpha Exchange, 2014). Finally, in an open letter to the SEC, Peterffy (2014) advocates for a delay of randomized duration of between 10 and 200 milliseconds. While all these proposals advocate for randomization in the delay as an additional means of blunting the advantages of speed, randomization does not lead to additional benefits in our model, and a deterministic duration suffices.

³³Other papers that promote frequent batch auctions include Madhavan (1992) and Wah and Wellman (2013). Additionally, batch auctions have received mention from policy makers in, for example, SEC (2010), Foresight (2012), Schneiderman (2014), and White (2014).

³⁴Budish, Cramton, and Shim (2014) indicate that this may be about 100 microseconds in practice.

Theorem 5 (Oligopoly). *With a multiple exchanges ($X \geq 2$), there exists a Nash equilibrium of the selective delay design with spread*

$$s_{SD}^* = \theta + \frac{2\alpha - \sqrt{X^2\theta^2 + 4\alpha^2}}{X}. \quad (15)$$

The strategies that support this spread as in Nash equilibrium are similar to those that are used in the equilibrium of the limit order book, which are outlined in section 3. The primary difference is that there are no stale-quote scalpers. The reason for this is that the selective delay eliminates the possibility that a high-frequency trader could successfully trade against a mispriced quote before it is cancelled by the liquidity provider.

Observe that the expressions for the bid-ask spread prevailing under the selective delay design given in theorems 4 and 5 correspond to their counterparts under the limit order book mechanism given in theorems 1 and 2 if the arrival rate of jumps in the fundamental value of the asset, λ_j , is taken to be zero. The intuition is that, because a selective delay eliminates stale-quote scalping, the portion of the spread that comes from adverse selection disappears, leaving only the portion that comes from the market power of exchanges. Consequently, as theorem 6 states, a selective delay results in a spread that is smaller than that prevailing under the limit order book.³⁵

Theorem 6 (Comparison). *Under assumptions 1, 2, and 3, $s_{SD}^* \leq s_{LOB}^*$.*

Evaluating the expressions for the selective delay spread at the estimated parameters, we find that the selective delay spreads are 51 percent lower relative to the prevailing order book spread (comparing rows 1 and 2 of column 2 in table 4). Since a selective delay eliminates all adverse selection from the model, it shuts down the exposure channel. Thus, competition between exchanges unambiguously lowers spreads. For example, moving from monopoly to duopoly decreases spreads by 7 percent, from 1.56 to 1.45 cents. Total welfare (table 5)

³⁵Notice that we have not used assumptions 1, 2, and 3 to obtain theorems 4 and 5. The absence of scalpers and the corresponding risk to the provision of liquidity imply that the equilibrium exists even they are violated. The intuition is that in the absence of scalpers exchanges are always willing to participate. And their profit maximization ensures that investors want to participate, since an exchange sets a transaction fee taking into account the elasticity of the residual demand.

compares favorably to the order book design for these alternative market designs and is estimated to increase more than six-fold relative to the status quo. Note further that under the selective delay mechanism, a symmetric equilibrium with three exchanges is feasible as well.

5.3 Dark Trading

Another policy debate has centered around “dark trades,” which take place outside the scope of “lit” exchanges. In recent years, there has been an increase in the amount of trading that takes place in this way. Using our model, we evaluate how market outcomes would be affected by a reversal of this trend.

Several types of trading fall into this category. First, a practice known as “internalization” refers to brokers executing orders against their own inventory. Second, block trades, also known as upstairs trades, are privately negotiated transactions, typically for large numbers of shares. Third, trading may occur in so-called “dark pools,” venues that facilitate trades between two parties at a price that is often pegged to the mid price at a lit exchange.³⁶

These three types of dark trading differ in a number of respects. However, they share many common features, which allows us to analyze them jointly in the context of our model. First, by definition they divert trades from the lit exchanges. Second, they do not contribute to the price finding mechanism, which is largely confined to lit exchanges. Third, dark trades attract a disproportionate amount of uninformed order flow. The literature has provided both theoretical (Zhu, 2014) and empirical (Comerton-Forde and Putniņš, 2013; Degryse, de Jong, and van Kervel, 2014) support for the latter claim.

Intimately connected with dark trading is the practice known as “payment for order flow,” whereby a retail broker may sell its order flow to a high-frequency trader. It is almost always the case that this trader then executes these orders in the dark.³⁷

³⁶Samelson (2012) reports that for the largest dark pools in the US the execution protocol allows prices to be pegged at the mid price of the national best bid offer (NBBO) quote.

³⁷For example, in Q2 2014 TD Ameritrade routed 14 percent of its non-directed orders of securities listed on NYSE to Citadel Securities LLC in return for a payment of 0.21 cents per share on average (TD Ameritrade, Inc., 2014, Q2). Citadel then routed these orders to different venues, none of them as market or limit orders (Citadel Securities LLC, 2014, Q2).

In Australia, dark trades accounted for 21.3 percent of shares traded in August 2014 (Fidessa, 2014).³⁸ An interesting counterfactual is the case in which all these trades were forced to occur on the lit market. In practice, dark traders tend to be uninformed, which corresponds to investors in our model, whose arrival is governed by λ_i . Therefore, within the context of our model, we interpret this counterfactual as an increase in λ_i by a factor of 1.26.³⁹

Note that by proceeding this way we assume that the demand elasticity of the investors who transact off-exchange is the same as for investors transacting on-exchange. Altering the estimated parameter values in this way, we find that forcing all trades to occur on the lit market would lead to a decrease of the lit market spread by 11 percent, from 2.92 to 2.60 cents. The reason is that adverse selection on lit venues is mitigated when investors are forced from the dark into the light. We omit the total welfare comparison for this counterfactual since this would require us to assess the utility of investors who trade in a dark pool, and the model does not provide an adequate framework for this assessment.

Table 4: Spreads under various counterfactuals (cents)

	Number of Exchanges		
	1	2	3
limit order book	2.25 (0.005)	2.92 (0.001)	
selective delay	1.56 (0.00785)	1.45 (0.0133)	1.40 (0.0176)
no dark liquidity	2.11 (0.005)	2.60 (0.001)	

The counterfactuals are based on the parameter estimates in table 3. Each row refers to a different market design: “limit order book” refers to the status quo; “no dark liquidity” assumes that all trades occur on a lit exchange. Standard errors based on 500 bootstrap replications are reported below coefficients.

³⁸The corresponding figure for the US amounts to 37.0 percent (BATS Global Markets, 2014).

³⁹The total lit volume in the model is $L = \lambda_i \left(1 - \frac{s_i}{2\theta}\right) + 2\lambda_j$, which corresponds to (1-0.213) percent of total, i.e. dark and lit, volume. For the counterfactual, λ_i is increased by D , which is pinned down by $\frac{D}{D+L} = 0.213$.

Table 5: Total welfare excluding travel costs, relative to order book duopoly (limit order book duopoly = 1)

	Number of Exchanges		
	1	2	3
limit order book	4.16 (0.14)	1.00 (0.10)	
frequent batch auctions, selective delay	6.57 (0.19)	6.87 (0.20)	7.00 (0.20)

Each cell refers to the sum of investor welfare (excluding travel costs), profits of high-frequency traders and exchanges. The counterfactuals are based on the parameter estimates in table 3. Standard errors based on 500 bootstrap replications are reported below coefficients.

6 Conclusions

In this paper we model the fragmentation of equity markets that is pervasive in most jurisdictions. We show that even in circumstances in which traders are perfectly informed about the fundamental asset value and about quotes at all exchanges, the welfare consequences of competition among exchanges are ambiguous. In our model two countervailing forces are at work in equilibrium: (i) the competition channel, whereby exchanges strategically lower their transaction fee to steal business from competitors; and (ii) the exposure channel, whereby the increased risk of liquidity provision with multiple exchanges induces liquidity providers to set a higher spread.

Empirically, we demonstrate that the competition channel is outweighed by the exposure channel in Australia, and we show that investors would fare better under a monopoly than a duopoly. We also use the empirical estimates of key parameters of the model to evaluate a new market design proposal. Recently, the strict price and time priority of the ubiquitous limit order book design has been criticized for providing scope for cross-venue trading strategies that may not be beneficial for regular investors. We propose a minimally intrusive change to the limit order book design that affects the way orders are processed, which we label *selective delay*, and show that it compares favorably to the limit order book outcomes as regards the bid-ask spread. Finally, we show that dark trading, a recent trend towards trading away

from formal exchanges, imposes a negative externality on the investors who remain on formal exchanges by altering the mix of information-motivated and liquidity-motivated trade.

A Alternative Trading Mechanisms: Additional Results

In section 5.2, we showed that a selective delay reduces the bid-ask spread by eliminating stale-quote sniping. This appendix contains the formalities underlying those results. It also demonstrates that the same reduction in the spread could be achieved by replacing continuous trading with frequent batch auctions. Furthermore, we also state some additional results pertaining to the equilibrium outcomes that prevail under these two alternatives to the limit order book.

A.1 Construction of Time

The formal analysis of these mechanisms is greatly simplified through the use of a construction of time that allows for infinitesimal time intervals. An equivalent modeling possibility would be to follow BCS in considering sequences of real numbers that converge to zero. However a direct use of infinitesimals both simplifies and clarifies the analysis.

Formally, we index points in time by elements of the hyperreals, ${}^*\mathbb{R}$, which are an ordered field extension of the reals containing nonzero infinitesimals.⁴⁰ We ultimately consider (i) a selective delay of infinitesimal duration, and (ii) batch auctions with infinitesimal batch lengths. The advantage of this approach is that, conditional on an investor arriving at a particular point in time, it is only with infinitesimal probability that a second investor of a jump arrives within an infinitesimal amount of time. Intuitively, this simplifies the analysis by allowing us to ignore (i) in the case of a selective delay, the possibility that an investor arrives with a desire to trade before the liquidity provider can react to the previous trade;

⁴⁰An *infinitesimal* $\varepsilon \in {}^*\mathbb{R}$ is a number for which $|\varepsilon| < \frac{1}{n} \forall n \in \mathbb{N}$. The hyperreals are the objects used in a branch of mathematics known as nonstandard analysis (Robinson, 1966; Goldblatt, 1998). A key result of nonstandard analysis is the *transfer principle*, which states that a sentence is true over \mathbb{R} if and only if a corresponding sentence is true over ${}^*\mathbb{R}$. This is useful for us because it allows us to perform exercises (such as defining random variables and computing probabilities) that involve the hyperreals in the natural way.

and (ii) in the case of frequent batch auctions, the possibility that an investor arrives with a desire to trade in the same batch interval in which another agent attempts to trade.

Furthermore, while we allow for infinitesimal time intervals, we do not allow for infinitesimal utils. More precisely, we assume that traders maximize the *standard part* of their expected utility.⁴¹ In effect, we assume that agents treat events with infinitesimal probabilities as though they have probability zero.

A.2 Selective Delay

The formal definition of the selective delay mechanism is as follows. All exchanges process cancellation orders immediately. However, other order types are processed only after a small delay. For the purposes of the analysis in this paper, the length of this delay is taken to be any positive infinitesimal $\delta_{SD} \in {}^*\mathbb{R}$. The characterizations of the equilibrium spread that prevails under a selective delay, theorems 4 and 5, which are presented in section 5.2, pertain to this formal definition.

This section contains some additional results pertaining to equilibrium outcomes under a selective delay, which complement those results. In particular, we obtain the following result, which summarizes how the equilibrium spread that prevails under a selective delay depends upon the parameters of the model.

In contrast to the case of limit order books, theorem 7 states that the selective delay spread is unambiguously nonincreasing in the number of exchanges. This is because without adverse selection, the exposure channel is turned off, leaving only the competition channel.

Theorem 7 (Comparative Statics). *The equilibrium spread of the selective delay mechanism is*

(i) *nonincreasing in X and*

(ii) *nondecreasing in α and θ .*

⁴¹In nonstandard analysis, the standard part of a number $x \in {}^*\mathbb{R}$ is the unique real number whose difference from x is an infinitesimal.

In addition, the utilities of agents in one of the selective delay equilibria can be computed as in section 3.4. First, we consider the utility of investors. In the case when travel costs do enter the utility of investors, the flow utility of the investor sector depends on the spread and is

$$\lambda_i \left[\frac{(2\theta - s_{SD}^*)^2}{8\theta} - \frac{\alpha}{4X} \right].$$

In the case when travel costs do not enter the utility of investors but instead reflect an agency problem, the utility of investors simplifies to the previous expression evaluated at $\alpha = 0$.

Second, since there is no stale-quote sniping, the flow utility of the market making sector is zero. Finally, the flow utility of the exchange sector is given by

$$\lambda_i \frac{s_{SD}^*(2\theta - s_{SD}^*)}{4\theta}.$$

Summing the above expressions yields the total flow utility of all agents, which is given by

$$\lambda_i \left[\frac{4\theta^2 - (s_{SD}^*)^2}{8\theta} - \frac{\alpha}{4X} \right].$$

As above, in the case when travel costs do not enter the utility of investors but instead reflect an agency problem, the expression simplifies to the previous equation evaluated at $\alpha = 0$. From this equation it is clear that welfare is higher under lower spreads.

A.3 Frequent Batch Auctions

In this section we consider the frequent batch auction design. We show that batch auctions implement outcomes identical to those that prevail under a selective delay. In this model, as in BCS, batching would improve outcomes by eliminating the adverse selection component of spreads. Intuitively, giving the liquidity provider a head start in the race to cancel stale quotes eliminates the adverse selection that stems from the race to act on public information.

Frequent batch auctions are uniform-price sealed-bid double auctions that are conducted repeatedly at discrete time intervals.⁴² In a batch auction design, exchanges process all orders

⁴²For a more detailed exposition of the batch auction design, see section 7.1 of Budish, Cramton, and Shim

received during an interval at the same time, regardless of their chronological sequence. For the purposes of the analysis here, the length of these intervals is taken to be a positive infinitesimal $\tau_{FBA} \in {}^*\mathbb{R}_+$.

The following results are analogous to those for a selective delay, and they demonstrate that frequent batch auctions implement a spread identical to that prevailing under a selective delay. Both a selective delay and frequent batch auctions allow liquidity providers to update their stale quotes before they can be sniped, thereby eliminating adverse selection. Whereas a selective delay achieves this by delaying the processing of orders that would be processed immediately, frequent batch auctions achieve this by delaying the processing of all orders until the end of the batch interval. These results are stated without proof. Batch auctions implement outcomes identical to those that prevail under a selective delay, and the proofs of these results would be similar to those of the corresponding results about the selective delay spread. While [Budish, Cramton, and Shim \(2014\)](#) advocate for batch auctions that are synchronized across exchanges, outcomes in this model are not sensitive to the presence or absence of synchronization.

Theorem 8 (Monopoly). *With a single exchange ($X = 1$), there exists a Nash equilibrium of the frequent batch auction design with spread*

$$s_{FBA}^* = \theta.$$

Theorem 9 (Oligopoly). *With a multiple exchanges ($X \geq 2$), there exists a Nash equilibrium of the frequent batch auction design with spread*

$$s_{FBA}^* = \theta + \frac{2\alpha - \sqrt{X^2\theta^2 + 4\alpha^2}}{X}.$$

Theorem 10 (Comparison). *Under assumptions 1, 2, and 3, $s_{FBA}^* \leq s_{LOB}^*$.*

Theorem 11 (Comparative Statics). *The equilibrium spread of the frequent batch auction*

(2013). For implementation details see [Budish, Cramton, and Shim \(2014\)](#).

design is

(i) *nonincreasing in X and*

(ii) *nondecreasing in α and θ .*

A.4 Comparing Selective Delay and Frequent Batch Auctions

In the specific setting of our model, selective delay and frequent batch auctions lead to identical outcomes. However, in [Baldauf and Mollner \(2015a\)](#) we study a setting in which the two mechanisms yield *different* outcomes, both of which can improve on the limit order book mechanism. The reason for the difference is that there is a different source of information in that paper. In this paper, information arrives publicly and exogenously to the market. Under this information structure, both selective delay and frequent batch auctions reduce adverse selection by allowing liquidity providers to cancel their mispriced quotes before they can be exploited by other traders. However, in [Baldauf and Mollner \(2015a\)](#), we study endogenous private information acquisition. Under that information structure, batching actually *increases* adverse selection by preventing a liquidity provider from learning what an informed trader is doing and canceling mispriced quotes. Consequently, in that model, the equilibrium spread is higher frequent batch auctions than under selective delay.

An important question from a market design perspective is the ability to implement a given mechanism in practice. We compare selective delay to frequent batch auctions along the mechanism's (i) ease of implementation; and (ii) compatibility with the regulatory framework. Selective delay can be implemented as a minimal modification to the existing order matching process. It would suffice to introduce a fork in the cable through which messages pass and have all orders but cancellations go through an extra loop of cable before being processed. Indeed, industry participants have shown some interest in selective delay mechanisms, which further points to a feasible implementation ([Aequitas, 2013](#); [Alpha Exchange, 2014](#)). In contrast, we are not aware of any exchange conducting frequent batch auctions at the moment.⁴³

⁴³Many venues conduct opening and closing auctions. However, these typically make available information

Regarding the suitable implementation at multiple markets it is important to recognize regulatory and legal constraints active in these markets. In most public equity markets broker-dealers face an obligation to obtain “best execution” for their clients. In Australia, the market integrity rules (ASIC, 2011, MIR) stipulate rules for best execution when the same security is offered at potentially differing conditions at more than one exchange. In the United States the order protection rule SEC (2005, Rule 611), mechanically forces an order to be routed to the exchange that provides the national best bid and offer (NBBO) for the first share.⁴⁴ The limit order book – even under the selective delay modification – is a posted price mechanism, so it is possible for a broker-dealer to ensure that he is submitting an order to the venue that will yield the best price at a particular point in time. In contrast, the prices based on frequent batch auctions are determined only at the end of a batch interval, and so a broker-dealer cannot know in advance which venue will yield the best price. Budish, Cramton, and Shim (2014) only consider one auction exchange alongside many exchanges, which operate conventional limit order books. We are not aware of a paper that has shown how frequent batch auctions can be implemented at multiple exchanges. It is thus likely that the legal framework would need to be modified if one were to consider a shift to batch auctions.

B Proofs

B.1 Limit Order Book

B.1.1 Monopoly

Proof of theorem 1. The proof proceeds in two parts. First we describe equilibrium strategies, and second we show that no player has a profitable deviation.

about orders before uncrossing and also often occur in parallel with a limit order book.

⁴⁴Technically, Australia follows a principles-based approach that allows a broker to route orders to an exchange based on a complex evaluation of prices, fees, and execution probability. However, for the purposes of smaller retail orders both jurisdictions call for a routing decision to the exchange with the best price.

Part One (Description): The strategy of the exchange is to set the transaction fee

$$\tau^* = \theta \frac{\lambda_i + \lambda_j}{2\lambda_i} - \frac{2\lambda_j\gamma}{\lambda_i + \lambda_j}.$$

One high-frequency trader plays the role of a “liquidity provider.” The remaining high-frequency traders (infinitely many) play the role of a “stale-quote scalpers.”

The strategy of the liquidity provider is as follows, where we use τ to denote the per-transaction fee set by the exchange. There are two cases. First, if $\tau^2 - 2\theta\tau \left(1 + \frac{\lambda_j}{\lambda_i}\right) + 2\theta \frac{\lambda_j}{\lambda_i} (\theta - 2\gamma) + \theta^2 \left(1 + \frac{\lambda_j^2}{\lambda_i^2}\right) < 0$, then the liquidity provider never quotes. Otherwise, we define

$$s(\tau) = \tau + \theta \left(1 + \frac{\lambda_j}{\lambda_i}\right) - \sqrt{\tau^2 - 2\theta\tau \left(1 + \frac{\lambda_j}{\lambda_i}\right) + 2\theta \frac{\lambda_j}{\lambda_i} (\theta - 2\gamma) + \theta^2 \left(1 + \frac{\lambda_j^2}{\lambda_i^2}\right)}.$$

The liquidity provider then acts as follows. At time zero, she submits to the exchange a limit order to buy one share at $v_0 - \frac{s(\tau)}{2}$ and a limit order to sell one share at $v_0 + \frac{s(\tau)}{2}$. If one of her standing limit orders is filled by an investor, then she immediately submits an identical order to replace it. If v_t jumps, then she immediately submits to the exchange the following orders: (i) cancellations for her limit orders, (ii) a limit order to buy one share at $v_{t^+} - \frac{s(\tau)}{2}$, and (iii) a limit order to sell one share at $v_{t^+} + \frac{s(\tau)}{2}$.⁴⁵

The strategy of a stale-quote scalper is as follows. If v_t jumps upward (downward), then she immediately submits to the exchange an IOC order to buy (sell) at the price $v_{t^-} + \frac{s_{LOB}^*}{2}$ ($v_{t^-} - \frac{s_{LOB}^*}{2}$).

An investor who arrives at time t with private transaction motive θ does one of the following: (i) if $\theta \geq s_{LOB}^*$, then he immediately places an IOC order to buy at the price $v_t + \frac{s_{LOB}^*}{2}$, (ii) if $\theta \leq -s_{LOB}^*$, then he immediately places an IOC order to sell at the price $v_t - \frac{s_{LOB}^*}{2}$, and (iii) if $\theta \in (-s_{LOB}^*, s_{LOB}^*)$, then he never places an order.

Part Two (Verification): We now argue that the investors have no profitable deviations.

⁴⁵For any continuous time variable X_t , we use the shorthand X_{t^+} to denote $\lim_{s \rightarrow t^+} X_s$ and X_{t^-} to denote $\lim_{s \rightarrow t^-} X_s$.

Given the prices quoted by the liquidity provider, investors are choosing quantities $y \in \{-1, 0, 1\}$ to maximize $u(y|\theta) = (v_t + \theta - p_{y,t})y$. They therefore have no incentive to deviate by choosing a different quantity.

We now argue that the liquidity provider has no profitable deviations. The equilibrium spread is $s_{LOB}^* = s(\tau^*) = \theta \left(1 + \frac{\lambda_j}{\lambda_i}\right)$. Therefore, as argued in section 3.1, she earns zero profits in the equilibrium. It remains to be shown that the liquidity provider has no deviations that would provide her with positive profits. It is not profitable to deviate by quoting a larger spread, since, because of the limit prices specified by the other traders, she would never participate in any trades. It is also not profitable to deviate by quoting a smaller spread, since that would result in negative expected profits. Finally, it is also not profitable to deviate by quoting more than a single unit at either the bid or the ask, since her benefits would be the same (only one unit at each is needed to satisfy investor demand) but her costs would increase (since more units are exposed to adverse selection from stale-quote scalper).

We now argue that the stale-quote scalpers have no profitable deviations. They also earn zero profits in the equilibrium, and it therefore remains to show that none of them possesses a deviation that would yield positive profits. It is not profitable to attempt to provide liquidity at a larger spread than the liquidity provider, since these orders would never be filled. It is also not profitable to attempt to provide liquidity at a smaller spread than the liquidity provider, since that would result in negative expected profits. It is also not profitable to attempt to provide liquidity at the same spread as the liquidity provider, since these quotes have the same adverse selection costs (from stale-quote scalper orders) that the liquidity provider faces in equilibrium but only half the benefits (from investor orders), and would therefore result in negative expected profits.

We now argue that the exchange has no profitable deviations. Given the behavior of the traders, the profits of the exchange are zero in the case where the liquidity provider does not quote. In the other case, the profits of the exchange are

$$\tau \left[\lambda_j + \lambda_i \left(1 - \frac{1}{\theta} \frac{s(\tau)}{2} \right) \right] = \lambda_i \left(1 - \frac{1}{\theta} \frac{s(\tau)}{2} \right) \frac{s(\tau)}{2} - \lambda_j \left(\gamma - \frac{s(\tau)}{2} \right).$$

The righthand side is a concave function of the spread, and it is maximized when the spread is $s(\tau) = s_{LOB}^*$. Since this is indeed the case for $s(\tau^*)$, the exchange has no profitable deviations to other values of τ for which the liquidity provider quotes. And by assumption 3, this yields nonnegative profits for the exchange, so the exchange also does not have a profitable deviation to a value of τ for which the liquidity provider does not quote. \square

B.1.2 Oligopoly

Proof of theorem 2. The proof proceeds in two parts. First we describe equilibrium strategies, and second we show that no player has a profitable deviation.

Part One (Description): The strategy of each exchange is to set the transaction fee

$$\tau^* = \frac{X^3(\lambda_j\theta^2 - 2\gamma\lambda_j\theta) + 4X^2\alpha\lambda_j\theta - 4\alpha^2\lambda_u - \sqrt{4\alpha^2 - (4\alpha\theta\lambda_j/\lambda_u - \theta^2)}X^2(X^2\lambda_j\theta - 2\alpha\lambda_u)}{2X^3\lambda_j\theta + X^2\lambda_u\theta - 2X\alpha\lambda_u + \sqrt{4\alpha^2 - (4\alpha\theta\lambda_j/\lambda_u - \theta^2)}X^2X\lambda_u}$$

One high-frequency trader per exchange plays the role of a “liquidity provider.” The remaining high-frequency traders (infinitely many) play the role of a “stale-quote scalper.”

To define the strategy of the liquidity provider for exchange x , we consider the following equation, where τ_x indicates the spread set by exchange x .

$$\lambda_i \left[\frac{1}{\alpha} \left(\frac{s_{LOB}^*}{2} - \frac{s_x}{2} \right) + \frac{1}{X} \right] \left(1 - \frac{1}{\theta} \frac{s_x}{2} \right) \left(\frac{s_x}{2} - \tau_x \right) - \lambda_j \left(\gamma - \frac{s_x}{2} + \tau_x \right) = 0 \quad (16)$$

There are two cases. First, if τ_x is such that there is no value of $s_x \in [0, 2\theta]$ that solves (16), then the liquidity provider never quotes. Second, if τ_x is such that there is a value of $s_x \in [0, 2\theta]$ that solves (16), then let $s(\tau_x)$ be defined implicitly as the smallest such solution. The liquidity provider for exchange x then acts as follows. At time zero, she submits to the exchange a limit order to buy one share at $v_0 - \frac{s(\tau_x)}{2}$ and a limit order to sell one share at $v_0 + \frac{s(\tau_x)}{2}$. If one of her standing limit orders is filled by an investor, then she immediately submits an identical order to replace it. If v_t jumps, then she immediately submits to exchange x the following orders: (i) cancellations for her limit orders, (ii) a limit order to buy one

share at $v_{t^+} - \frac{s(\tau_x)}{2}$, and (iii) a limit order to sell one share at $v_{t^+} + \frac{s(\tau_x)}{2}$.

The strategy of a stale-quote scalper is as follows. If v_t jumps upward (downward), then she immediately submits to each exchange an IOC order to buy (sell) at the price $v_t + \frac{s_{LOB}^*}{2}$ ($v_t - \frac{s_{LOB}^*}{2}$).

An investor who arrives at time t with private transaction motive θ does one of the following: (i) if $\theta \geq s_{LOB}^*$, then he immediately places an IOC order to buy at the price $v_t + \frac{s_{LOB}^*}{2}$ to an exchange $x^* \in \arg \min_x d(l, l_x)$; (ii) if $\theta \leq -s_{LOB}^*$, then he immediately places an IOC order to sell at the price $v_t - \frac{s_{LOB}^*}{2}$ to an exchange $x^* \in \arg \min_x d(l, l_x)$; and (iii) if $\theta \in (-s_{LOB}^*, s_{LOB}^*)$, then he never places an order.

Part Two (Verification): We now argue that the investors have no profitable deviations. Given the prices quoted by the liquidity provider, investors are choosing exchanges $x \in \{1, \dots, X\}$ and quantities $y \in \{-1, 0, 1\}$ to maximize

$$u(y, x | \tilde{\theta}, \tilde{l}) = \begin{cases} v_t + \tilde{\theta} - a_{x,t} - \alpha \cdot d(\tilde{l}, l_x) & \text{if } y = 1 \\ b_{x,t} - v_t - \tilde{\theta} - \alpha \cdot d(\tilde{l}, l_x) & \text{if } y = -1 \\ -\alpha \cdot d(\tilde{l}, l_x) & \text{if } y = 0 \end{cases}$$

They therefore have no incentive to deviate by choosing a different exchange or quantity.

We now argue that the liquidity provider at exchange x has no profitable deviations. The equilibrium spread at each exchange is $s_{LOB}^* = s(\tau^*) = \frac{(X\theta + 2\alpha)\lambda_i - \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}}{X\lambda_i}$. Therefore, as argued in section 3.1, she earns zero profits in the equilibrium. It remains to be shown that the liquidity provider has no deviations that would provide her with positive profits. This can be argued as in the proof of theorem 1.⁴⁶

That the other high-frequency traders also have no profitable deviations can be argued as in the proof of theorem 1.

⁴⁶The only subtlety is in showing that quoting a smaller spread would result in negative expected profits. To see this, note that s_{LOB}^* is the smallest value of s_x that solves (16) for $\tau_x = \tau^*$. The lefthand side of (16) is a cubic equation in s_x with a positive leading coefficient. Consequently the solution must come at a downward crossing. Tighter quotes must therefore bring negative profits.

We now argue that the exchange has no profitable deviations. Given the behavior of the traders and other exchanges, the profits of exchange x are zero in the case where the liquidity provider does not quote. In the other case, the profits that exchange x derives from setting the transaction fee τ_x are, by (16)

$$\begin{aligned} \tau_x & \left\{ \lambda_j + \lambda_i \left[\frac{1}{\alpha} \left(\frac{s_{LOB}^*}{2} - \frac{s(\tau_x)}{2} \right) + \frac{1}{X} \right] \left(1 - \frac{1}{\theta} \frac{s(\tau_x)}{2} \right) \right\} \\ & = \lambda_i \left[\frac{1}{\alpha} \left(\frac{s_{LOB}^*}{2} - \frac{s(\tau_x)}{2} \right) + \frac{1}{X} \right] \left(1 - \frac{1}{\theta} \frac{s(\tau_x)}{2} \right) \frac{s(\tau_x)}{2} - \lambda_j \left(\gamma - \frac{s(\tau_x)}{2} \right). \end{aligned}$$

Thinking of the righthand side as a function of $s(\tau_x)$, it can be shown that the righthand side is maximized on the domain $[0, 2\theta]$ when the spread is $s(\tau_x) = s_{LOB}^*$. Since this is indeed the case for $s(\tau^*)$, the exchange has no profitable deviations to other values of τ_x for which the liquidity provider quotes. And by assumption 3, this yields nonnegative profits for the exchange, so the exchange also does not have a profitable deviation to a value of τ for which the liquidity provider does not quote. \square

B.1.3 Comparative Statics

Proof of theorem 3. We consider separately the case of monopoly and the case of oligopoly.

Case One ($X = 1$): In this case, the claims follow straightforwardly from the derivative of the expression for s_{LOB}^* given in theorem 1 with respect to those parameters.

Case Two ($X \geq 2$): In this case, the claims follow from the derivative of the expression for s_{LOB}^* given in theorem 2 with respect to those parameters. To establish this, we first compute

these derivatives:

$$\begin{aligned}
\frac{\partial s_{LOB}^*}{\partial \lambda_i} &= \frac{-2\alpha\lambda_j\theta X}{\lambda_i\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}} \\
\frac{\partial s_{LOB}^*}{\partial \lambda_j} &= \frac{2\alpha\lambda_j\theta X}{\lambda_i\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}} \\
\frac{\partial s_{LOB}^*}{\partial \alpha} &= \frac{2}{X} \cdot \frac{\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta} - 2\alpha\lambda_i + \lambda_j\theta X^2}{\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}} \\
\frac{\partial s_{LOB}^*}{\partial \theta} &= \frac{\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta} - \theta\lambda_i X + 2\alpha\lambda_j X}{\sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta}}
\end{aligned}$$

The derivatives with respect to λ_i and λ_j have the desired sign. To sign the remaining derivatives, we first demonstrate that $\lambda_i \geq X\lambda_j$. Suppose to the contrary that $\frac{\lambda_j}{\lambda_i} > \frac{1}{X}$. Then the oligopoly spread is

$$\begin{aligned}
s_{LOB}^* &= \theta + \frac{2\alpha}{X} - \sqrt{\theta^2 + \frac{4\alpha^2}{X^2} - 4\alpha\frac{\lambda_j}{\lambda_i}\theta} \\
&> \theta + \frac{2\alpha}{X} - \sqrt{\theta^2 + \frac{4\alpha^2}{X^2} - \frac{4\alpha}{X}\theta} \\
&= \theta + \frac{2\alpha}{X} - \left(\frac{2\alpha}{X} - \theta\right) \\
&= 2\theta,
\end{aligned}$$

which contradicts assumption 1. We therefore have $\lambda_i \geq X\lambda_j$. We then argue as follows.

First:

$$\begin{aligned}
\frac{\partial s_{LOB}^*}{\partial \alpha} &\geq 0 \\
\iff \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta} &\geq 2\alpha\lambda_i - \lambda_j\theta X^2 \\
\iff (X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta &\geq (2\alpha\lambda_i - \lambda_j\theta X^2)^2 \\
\iff \lambda_i^2\theta^2 X^2 &\geq \lambda_j^2\theta^2 X^4 \\
\iff \lambda_i &\geq X\lambda_j,
\end{aligned}$$

which we have already shown. Second:

$$\begin{aligned}
& \frac{\partial s_{LOB}^*}{\partial \theta} \geq 0 \\
& \iff \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta} \geq \theta\lambda_iX - 2\alpha\lambda_jX \\
& \iff (X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_j\lambda_i\theta \geq (\theta\lambda_iX - 2\alpha\lambda_jX)^2 \\
& \iff 4\alpha^2\lambda_i^2 \geq 4\alpha^2\lambda_j^2X^2 \\
& \iff \lambda_i \geq X\lambda_j,
\end{aligned}$$

which we have already shown. □

B.2 Selective Delay

B.2.1 Monopoly

Proof of theorem 4. The proof proceeds in two parts. First we describe equilibrium strategies, and second we show that no player has a profitable deviation.

Part One (Description): The strategy of the exchange is to set the transaction fee $\tau^* = \frac{\theta}{2}$.

One high-frequency trader plays the role of a “liquidity provider.” The remaining high-frequency traders never submit any orders.

The strategy of the liquidity provider is as follows, where we use τ to denote the per-transaction fee set by the exchange. There are two cases. First, if $\tau > \theta$, then the liquidity provider never quotes. Otherwise, the liquidity provider acts as follows. At time zero, she submits to the exchange a limit order to buy one share at $v_0 - \tau$ and a limit order to sell one share at $v_0 + \tau$. If one of her standing limit orders is filled by an investor, then she immediately submits an identical order to replace it. If v_t jumps, then she immediately submits to the exchange the following orders: (i) cancellations for her limit orders, (ii) a limit order to buy one share at $v_{t^+} - \tau$, and (iii) a limit order to sell one share at $v_{t^+} + \tau$.

An investor who arrives at time t with private transaction motive θ does one of the following: (i) if $\theta \geq s_{SD}^*$, then he immediately places an IOC order to buy at the price

$v_t + \frac{s_{SD}^*}{2}$, (ii) if $\theta \leq -s_{SD}^*$, then he immediately places an IOC order to sell at the price $v_t - \frac{s_{SD}^*}{2}$, and (iii) if $\theta \in (-s_{SD}^*, s_{SD}^*)$, then he never places an order.

Part Two (Verification): That investors have no profitable deviations is as in the proof of theorem 1.

We now argue that the liquidity provider has no profitable deviations. Since the liquidity provider faces no adverse selection from stale-quote scalpers, and since she sets the half-spread equal to the transaction fee, she earns zero profits in equilibrium. It remains to be shown that the liquidity provider has no deviations that would provide her with positive profits. This can be argued as in the proof of theorem 1.

That the other high-frequency traders also have no profitable deviations can be argued as in the proof of theorem 1.

We now argue that the exchange has no profitable deviations. Given the behavior of the traders, the profits of the exchange are zero in the case where the liquidity provider does not quote. In the other case, the profits of the exchange are

$$\lambda_i \left(1 - \frac{1}{\theta} \tau\right) \tau.$$

This is a concave function of τ , and it is maximized when $\tau = \frac{\theta}{2}$. The exchange therefore has no profitable deviations to other values of τ for which the liquidity provider quotes. And since this yields positive profits, the exchange does not have a profitable deviation to a value of τ for which the liquidity provider does not quote. \square

B.2.2 Oligopoly

Proof of theorem 5. The proof proceeds in two parts. First we describe equilibrium strategies, and second we show that no player has a profitable deviation.

Part One (Description): The strategy of the exchange is to set the transaction fee

$$\tau^* = \frac{X\theta + 2\alpha - \sqrt{X^2\theta^2 + 4\alpha^2}}{2X}.$$

One high-frequency trader per exchange plays the role of a “liquidity provider.” The remaining high-frequency traders never submit any orders.

The strategy of the liquidity provider for exchange x is as follows, where we use τ_x to denote the per-transaction fee set by the exchange. There are two cases. First, if $\tau_x > \theta$, then the liquidity provider never quotes. Otherwise, the liquidity provider acts as follows. At time zero, she submits to the exchange a limit order to buy one share at $v_0 - \tau_x$ and a limit order to sell one share at $v_0 + \tau_x$. If one of her standing limit orders is filled by an investor, then she immediately submits an identical order to replace it. If v_t jumps, then she immediately submits to the exchange the following orders: (i) cancellations for her limit orders, (ii) a limit order to buy one share at $v_{t^+} - \tau_x$, and (iii) a limit order to sell one share at $v_{t^+} + \tau_x$.

An investor who arrives at time t with private transaction motive θ does one of the following: (i) if $\theta \geq s_{SD}^*$, then he immediately places an IOC order to buy at the price $v_t + \frac{s_{SD}^*}{2}$ to an exchange $x^* \in \arg \min_x d(l.l_x)$; (ii) if $\theta \leq -s_{SD}^*$, then he immediately places an IOC order to sell at the price $v_t - \frac{s_{SD}^*}{2}$ to an exchange $x^* \in \arg \min_x d(l.l_x)$; and (iii) if $\theta \in (-s_{SD}^*, s_{SD}^*)$, then he never places an order.

Part Two (Verification): That investors have no profitable deviations is as in the proof of theorem 2.

We now argue that the liquidity provider at exchange x has no profitable deviations. Since the liquidity provider faces no adverse selection from stale-quote scalpers, and since she sets the half-spread equal to the transaction fee, she earns zero profits in equilibrium. It remains to be shown that the liquidity provider has no deviations that would provide her with positive profits. This can be argued as in the proof of theorem 1.

That the other high-frequency traders also have no profitable deviations can be argued as in the proof of theorem 1.

We now argue that the exchange has no profitable deviations. Given the behavior of the traders and other exchanges, the profits of exchange x are zero in the case where the liquidity provider does not quote. In the other case, the profits that exchange x derives from setting

the transaction fee τ_x are

$$\lambda_i \left[\frac{1}{\alpha} (\tau^* - \tau_x) + \frac{1}{X} \right] \left(1 - \frac{1}{\theta} \tau_x \right) \tau_x$$

It can be shown that this is maximized on the domain $[0, \theta]$ at $\tau_x = \tau^*$. The exchange therefore has no profitable deviations to other values of τ_x for which the liquidity provider quotes. And since this yields positive profits, the exchange does not have a profitable deviation to a value of τ for which the liquidity provider does not quote. \square

B.2.3 Comparison: Selective Delay vs. Limit Order Book

Proof of theorem 6. We consider separately the case of monopoly and the case of oligopoly.

Case One ($X = 1$): The claim follows directly from the expressions for s_{LOB}^* and s_{SD}^* given in theorems 1 and 4.

Case One ($X \geq 2$): Define

$$s(\Omega) = \frac{(X\theta + 2\alpha)\lambda_i - \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_i\theta\Omega}}{X\lambda_i}.$$

Comparing $s(\Omega)$ to the expressions for s_{LOB}^* and s_{SD}^* given in theorems 2 and 5, we have $s(0) = s_{SD}^*$ and $s(\lambda_j) = s_{LOB}^*$. Differentiating,

$$s''(\Omega) = \frac{2\alpha\theta X\Omega}{\lambda_i \sqrt{(X^2\theta^2 + 4\alpha^2)\lambda_i^2 - 4X^2\alpha\lambda_i\theta\Omega}},$$

which is nonnegative on the interval $[0, \lambda_j]$. We conclude that $s_{SD}^* = s(0) \leq s(\lambda_j) = s_{LOB}^*$, as claimed. \square

B.2.4 Comparative Statics

Proof of theorem 7. At first we consider separately the case of monopoly and the case of oligopoly. Then to completely establish the comparative static with respect to X , we compare

the two cases.

Case One ($X = 1$): In this case, the claims follow straightforwardly from the derivative of the expression for s_{SD}^* given in theorem 4 with respect to those parameters.

Case Two ($X \geq 2$): In this case, the claims follow from the derivative of the expression given for s_{SD}^* in theorem 5 with respect to those parameters. To establish this, we first compute these derivatives:

$$\begin{aligned}\frac{\partial s_{SD}^*}{\partial \alpha} &= \frac{2}{X} - \frac{4\alpha}{X\sqrt{4\alpha^2 + \theta^2 X^2}} \\ \frac{\partial s_{SD}^*}{\partial \theta} &= 1 - \frac{\theta X}{\sqrt{4\alpha^2 + \theta^2 X^2}} \\ \frac{\partial s_{SD}^*}{\partial X} &= \frac{\sqrt{4\alpha^2 + \theta^2 X^2}}{X^2} - \frac{\theta^2}{\sqrt{4\alpha^2 + \theta^2 X^2}} - \frac{2\alpha}{X^2}\end{aligned}$$

We now sign these derivatives. First:

$$\begin{aligned}\frac{\partial s_{SD}^*}{\partial \alpha} &\geq 0 \\ \iff \sqrt{4\alpha^2 + \theta^2 X^2} &\geq 2\alpha \\ \iff 4\alpha^2 + \theta^2 X^2 &\geq 4\alpha^2,\end{aligned}$$

which is the case. Second:

$$\begin{aligned}\frac{\partial s_{SD}^*}{\partial \theta} &\geq 0 \\ \iff \sqrt{4\alpha^2 + \theta^2 X^2} &\geq \theta X \\ \iff 4\alpha^2 + \theta^2 X^2 &\geq \theta^2 X^2,\end{aligned}$$

which is the case. Third:

$$\begin{aligned}
& \frac{\partial s_{SD}^*}{\partial X} \leq 0 \\
& \iff 4\alpha^2 + \theta^2 X^2 - \theta^2 X^2 - 2\alpha\sqrt{4\alpha^2 + \theta^2 X^2} \leq 0 \\
& \iff 2\alpha \leq \sqrt{4\alpha^2 + \theta^2 X^2} \\
& \iff 4\alpha^2 \leq 4\alpha^2 + \theta^2 X^2,
\end{aligned}$$

which is the case. To finish demonstrating the comparative static with respect to X , we must show that s_{SD}^* is larger for $X = 1$ than for $X \geq 2$. Comparing the expressions given in theorems 4 and 5, this is the case iff

$$\begin{aligned}
& 2\alpha \leq \sqrt{X^2\theta^2 + 4\alpha^2} \\
& \iff 4\alpha^2 \leq X^2\theta^2 + 4\alpha^2,
\end{aligned}$$

which is the case. □

C Limit Order Book

The most common method of trading in financial markets is via a Limit Order Book (LOB). While LOB-based markets may differ on some subtle points, they share a number of properties in common. This appendix contains a broad overview of LOBs and should not be interpreted as a complete description of the rules governing trading on all LOB-based markets.

A LOB is a collection of orders, which can be submitted by any trader, to express a willingness to buy or sell. Orders sent to the LOB for a particular security are processed sequentially, in the order that they are received. In general, there are two types of messages: *limit orders* and *cancellations*.

A limit order l consists of the tuple (q_l, p_l, t_l) , which specify, respectively, a quantity, a price, and a time in force.⁴⁷ The quantity q_l can be positive, if the trader wishes to sell, or

⁴⁷Depending on the market, various modifications of limit orders may be possible. Such modifications

negative, if the trader wishes to buy. The time in force t_l designates when the order is to expire in the event that it is not matched. A selection of special types of limit orders are described below. A *good 'til cancelled (GTC) order* is a limit order with a time in force of $t_l = \infty$. An *immediate or cancel (IOC) order* is a limit order with a time in force of $t_l = 0$. A *market order* is an IOC order with a limit price of $p_l = \infty$ in the case of an order to buy, or $p_l = -\infty$ in the case of an order to sell.

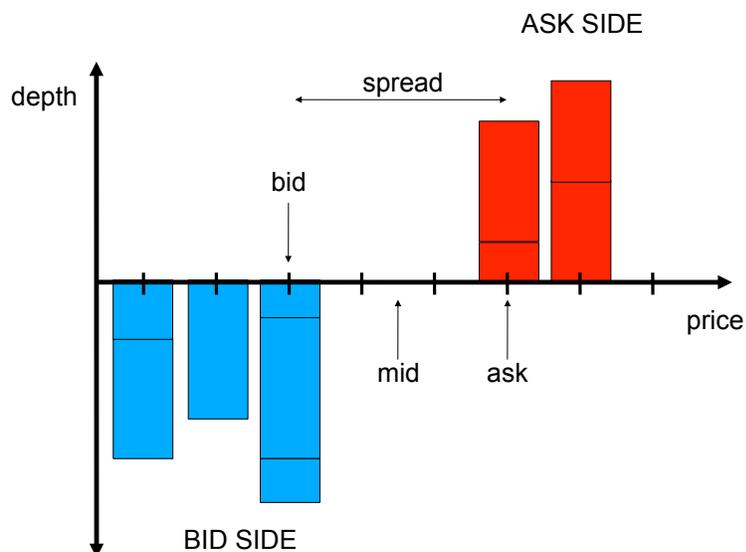
Incoming limit orders are processed as follows. First, it is checked whether the incoming order makes possible trade with any orders that are currently in the LOB. If so, then the order leads to an execution at the price specified by the order in the LOB (i.e. take-it-or-leave-it pricing). If orders in the LOB must be rationed, they are typically done so first according to price (better prices receive priority) and then according to time (orders that were received sooner receive priority). If no match is found, then the order is added to the LOB. Figure 2 contains a visual illustration of a LOB at a particular point in time.

A cancellation is simply an instruction to cancel a previously submitted limit order in the event that it has not yet been executed.

Given any LOB with at least one buy and one sell order, we can define several important variables. The *bid* is the highest price at which there exists an order to buy. The *ask* is the lowest price at which there exists an order to sell. The *mid price* is the average of the bid and ask. The *spread* is the difference between the bid and ask. The *depth* at a particular price refers to the total number of shares available at that price. These quantities are depicted visually in figure 2.

include partially visible orders, so-called iceberg orders, and others.

Figure 2: Illustration of a Limit Order Book



Note: The horizontal axis depicts price levels, which are discrete. The height of the bar represents the number of shares available to transact based on active buy and sell orders. Positive quantities represent offers to sell, and negative quantities represent offers to buy. Within a particular price level, orders are sorted according to time priority.

D Data

Our dataset consists of message feeds from ASX and Chi-X, which are marketed under the names “ITCH – Glimpse” and “Chi-X MD Feed,” respectively. This data is a complete historical record of the information that market participants observe in real-time for a fee, in chronological order. These feeds are outbound market data feeds and are based on NASDAQ’s proprietary ITCH protocol. For order entry separate protocols are used.

What makes this data source more challenging to deal with relative to more conventional datasets is that, to ensure high-performance for latency-sensitive traders, only incremental changes are reported. Rather than transmit, for example, the current bid and ask prices, only incremental changes are broadcast. A message does not even contain an absolute timestamp. Rather, a message contains the time relative to the last timestamp that was broadcast,

which is issued every second. Two steps are necessary to obtain an analytic dataset from the raw data: message parsing and order book reconstruction. The first step, message parsing, involves unpacking data packets. Every message is binary encoded using MoldUDP64, a networking protocol that allows efficient and scaleable transmission of data. A message is read in as a message block, which consists of the message length and the message data. The length is given by the first two bytes, which contain the number of message data bytes. Depending on the type of message, the message data contains a different amount of information. Table 6 contains examples of the type of information that is contained in common messages.

Table 6: Examples of message data formats

	length	value
<i>Seconds Message</i>		
Message Type	1	“T”
Second	4	Numeric
<i>Add Order Message</i>		
Message Type	1	“A”
Timestamp – Nanoseconds	4	Numeric
Order ID	8	Numeric
Order Book ID	4	Numeric
Side (Buy or Sell)	1	Alpha
Order Book Position	4	Numeric
Quantity	8	Numeric
Price	4	Numeric
<i>Order Delete Message</i>		
Message Type	1	“D”
Timestamp – Nanoseconds	4	Numeric
Order ID	8	Numeric
Order Book ID	4	Numeric
Side (Buy or Sell)	1	Alpha
Side (Buy or Sell)	1	Alpha

The table contains a sample of message specifications of the Glimpse – ITCH Message Specification v1.0, which is used by ASX. The length of a field is measured in number of bytes.

The second step, order book reconstruction, involves re-running the message broadcast of a given day and security in chronological order. The following algorithm can be applied. Let M denote a chronologically sorted list of messages pertaining to a security.

Figure 3: Algorithm for building the limit order book

```
def getBidAsk(LOB):
    S = sellOrders(LOB)
    ask = minPrice(S)
    B = buyOrders(LOB)
    bid = maxPrice(B)
    return [bid, ask]

LOB = {}
for m in M:
    if isAddOrder(m):
        addMessage(LOB,m)
    if isCancelOrder(m):
        removeMessage(LOB,m)
    if isTrade(m):
        removeMessage(m)
    print getBidAsk(LOB)
```

Note: The functions *isAddOrder*, *isCancelOrder*, and *isTrade* evaluate to true or false depending on the message type of the message. The functions *addMessage* and *removeMessage* modify the current order book *LOB* by adding or removing the quantity at the limit price specified by message *m*.

Note that every trading day is recorded in a separate file, and within a day messages pertaining to all securities are recorded chronologically. In order to reconstruct the order book for STW, for instance, all messages that are being broadcast on that day have to be processed. This task is highly parallelizable at the day level. We implement a routine to parse messages and reconstruct the order book using the high-performance computing system *Blacklight* at the Pittsburgh Supercomputing Center, as part of an allocation at XSEDE (Extreme Science and Engineering Discovery Environment).

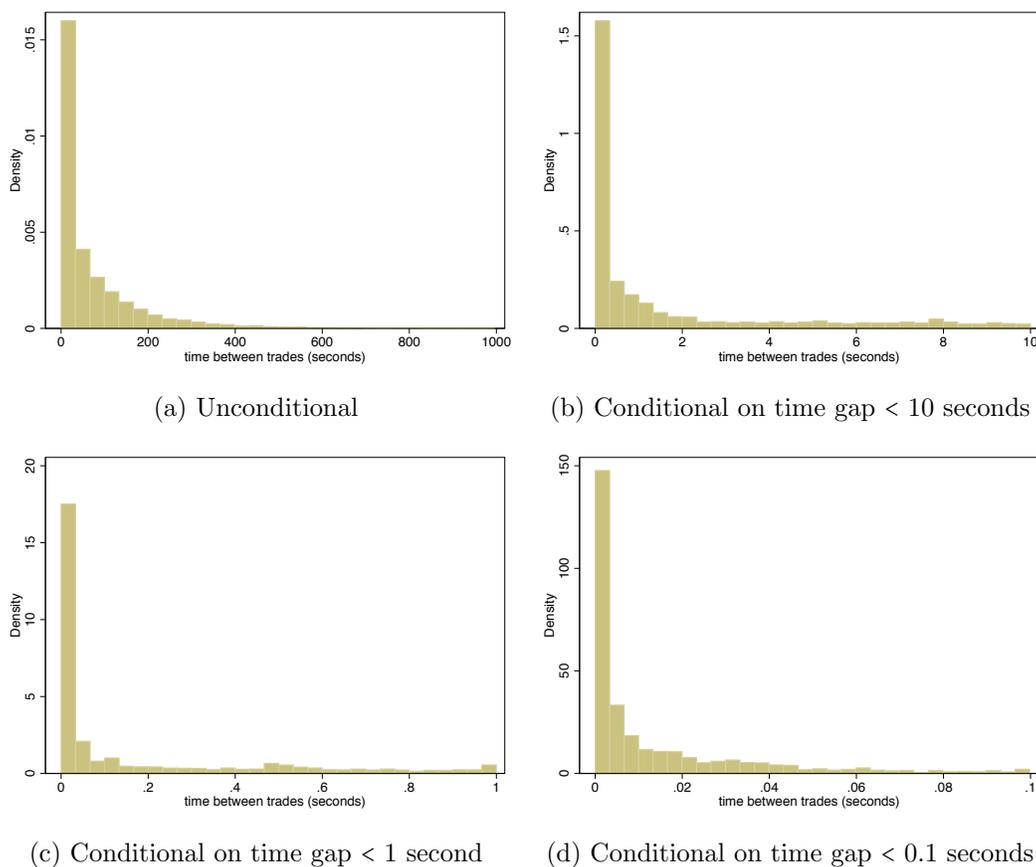
E Robustness

In the main text we have used a time gap of one second to distinguish between isolated and clustered trades. Specifically, we classify a trade as isolated if no other trade occurs within ω of that trade on either ASX or Chi-X. Conversely, trades are classified as clustered if at least one other trade occurs within ω of that trade on either ASX or Chi-X. This appendix

contains additional evidence on how to define isolated trades in the data. We show that the main results are robust to changes in the precise definition of what constitutes an isolated trade.

First, we consider the distribution of time gaps between any two consecutive trades. Figure 4 shows histograms of time gaps between any two consecutive trades on either ASX or Chi-X. The histograms differ in the support of time gaps that are considered. It is striking that the unconditional distribution looks very similar to the distribution conditional on time gaps being less than 100ms. All distributions are heavily skewed to the right with mass just above zero. Therefore, the extent of type I and II errors that stem from a classification error is relatively limited because the mass between any two cutoff points is small compared to the entire distribution.

Figure 4: Distribution of time gaps between trades



An observation is a time period between two consecutive trades on either ASX or Chi-X during the continuous trading session in one of the 76 trading days in the sample.

Next, we show that the estimation in section 4.3 is robust to alternative values of ω , the cutoff value that is used for defining isolated and clustered trades. Table 7 contains the parameter estimates for five different choices of ω , the maximum amount of time between two trades such that they are classified as clustered, ranging from 10ms to 2s. The upper bound of this range is governed by the time it takes a human trader to make decisions. In practice, order submission is typically automated and thus more synchronized compared to what a human could achieve. The lower bound is a time span that we have determined based on discussions with industry participants in Australia. The table reveals that the precise definition of what constitutes an isolated trade, for a range of cutoff values from 10ms to 2s, has almost no impact on the parameter estimates and, consequently, does not change the

results qualitatively.

Table 7: Estimates for different definitions of isolated trades

	value of ω				
	10ms	100ms	500ms	1000ms	2000ms
<i>A. parameter estimates</i>					
α	11.0683	11.0683	11.0683	11.0683	11.0684
θ	1.5533	1.5592	1.5562	1.5582	1.5557
λ_i	0.0041	0.0044	0.0047	0.0052	0.0056
λ_j	0.0018327	0.00195316	0.00209385	0.0023114	0.00249648
<i>B. counterfactual spreads</i>					
monopoly	2.2477	2.2514	2.2495	2.2507	2.2491
duopoly	2.9170	2.9170	2.9170	2.9170	2.9170

An isolated trade is defined as no other trade occurring within ω of that trade on either ASX or Chi-X. The point estimates are determined by minimizing the quadratic form based on the four moment conditions that are defined in the previous section. The sample is constructed from the continuous trading session of all trading days in our data, between 10:30-16:00. Each trading day is divided into one second increments. Estimation is based on the restricted sample of intervals during which the quoted bid and ask prices at ASX and Chi-X were the same. The estimation was performed using SNOPT (Gill, Murray, and Saunders, 2008).

F Evidence on Isolated Trades

Our model postulates that investors divert trades from one exchange to another if the prices at the second exchange are more favorable. This gives rise to a downward-sloping demand system where the prices are the spreads that prevail at ASX and at Chi-X. Table 8 shows the coefficients of regressions that explain variation in the occurrence of an isolated trade as a function of the spread. Panel A shows the estimates based on the restriction that the bid and the ask prices at ASX and Chi-X are equal. Column (1) says that the probability of an isolated trade on either ASX or Chi-X is 0.4 percentage points lower when the spread is increased by one cent. The slope coefficient is negative and highly significant in all specifications. In panel B we report the estimates for the full sample. The event of an isolated trade at either ASX or Chi-X is regressed on the own spread and the spread at the other exchange, as well as a constant. The estimates reveal that the probability of an isolated trade occurring is decreasing in the own spread and increasing in the spread at the other exchange, as one would expect in the case where exchanges are substitutes.

In the model, the slope of an isolated trade with respect to the spread is given by $-\frac{\lambda_i}{2\theta}$.⁴⁸ Evaluating this slope at the GMM parameter estimates yields -0.0017 . This value lies between the two OLS estimates based on the restricted sample (-0.0044) and the full sample (-0.0007).

Table 8: Isolated trades as function of the spread, OLS estimation

	Dependent Variable: $\mathbb{1}\{isolated\ trade\}$		
	BUY or SELL (1)	BUY (2)	SELL (3)
<i>A. restricted sample</i>			
spread	-0.00443 (0.0000916)	-0.00250 (0.0000663)	-0.00193 (0.0000634)
constant	0.0167 (0.000274)	0.00925 (0.000199)	0.00743 (0.000190)
Observations	923,750	923,750	923,750
<i>B. full sample</i>			
own spread	-0.000745 (0.0000402)	-0.000309 (0.0000288)	-0.000439 (0.0000281)
other spread	0.000499 (0.0000402)	0.000292 (0.0000288)	0.000207 (0.0000281)
constant	0.00437 (0.000147)	0.00194 (0.000105)	0.00243 (0.000103)
Observations	3,009,448	3,009,448	3,009,448

An observation is one second between 10:30 and 16:00 on one of the 76 trading days in the sample. Panel A restricts the sample to observations for which the bid and ask prices at ASX and Chi-X are equal. Panel B uses the unrestricted sample. A trade is classified as isolated if it did not occur within one second of another trade at either ASX or Chi-X. The dependent variables are indicators for isolated trades at ASX or Chi-X, which are (1) buys or sells, (2) buys only, or (3) sells only. $\mathbb{1}\{isolated\ trade\}$ evaluates to unity for a second during which a trade happened conditional on no other trade happening within a second on either exchange.

⁴⁸Formally, this assumes that investors participate and that the max operator in equation (11) does not evaluate to zero.

References

- AEQUITAS (2013): “Application for Recognition of Aequitas Innovations Inc. and Aequitas Neo Exchange Inc. as an Exchange,” Notice and Request for Comment.
- AITKEN, M., H. CHEN, AND S. FOLEY (2013): “How beneficial has Competition been for the Australian Equity Marketplace?” *Capital Markets Cooperative Research Centre*.
- ALPHA EXCHANGE INC. (2014): “Notice of Proposed Rule Amendments and Request for Comments,” Notice of Proposed Rule Amendments.
- AMIHUD, Y., B. LAUTERBACH, AND H. MENDELSON (2003): “The Value of Trading Consolidation: Evidence From the Exercise of Warrants,” *Journal of Financial and Quantitative Analysis*, 38, 829–846.
- ANDERSON, S. P., A. DE PALMA, AND J. F. THISSE (1992): *Discrete choice theory of product differentiation*, MIT press.
- AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION (2011): “ASIC Market Integrity Rules (Competition in Exchange Markets),” .
- BALDAUF, M. AND J. MOLLNER (2015a): “High-Frequency Trade and Market Performance,” *Working Paper*.
- (2015b): “The Private Value of Speed: Systematic Advantages of Fast Liquidity Providers,” *Working Paper*.
- BARON, M., J. BROGAARD, AND A. KIRILENKO (2012): “The Trading Profits of High Frequency Traders,” *Working Paper*.
- BATS GLOBAL MARKETS (2014): “Historical Market Volume Data,” http://batstrading.com/market_data/market_volume_history, accessed: 2014-08-14.
- BATTALIO, R., S. A. CORWIN, AND R. JENNINGS (2013): “Can Brokers Have it all? On the Relation between Make Take Fees & Limit Order Execution Quality,” *On the Relation between Make Take Fees & Limit Order Execution Quality (December 13, 2013)*.

- BOEHMER, B. AND E. BOEHMER (2003): “Trading Your Neighbor’s ETFs: Competition or Fragmentation?” *Journal of Banking & Finance*, 27, 1667–1703.
- BUDISH, E., P. CRAMTON, AND J. SHIM (2013): “The High-Frequency Trading Arms Race: Frequent Batch Auctions as a Market Design Response,” *Working Paper*.
- (2014): “Implementation Details for Frequent Batch Auctions: Slowing Down Markets to the Blink of an Eye,” *American Economic Review: Papers & Proceedings*, 104, 418–424.
- CHOWDHRY, B. AND V. NANDA (1991): “Multimarket Trading and Market Liquidity,” *Review of Financial Studies*, 4, 483–511.
- CITADEL SECURITIES LLC (2014, Q2): “SEC Rule 606 Report,” https://www.citadelsecurities.com/_files/uploads/sites/2/2013/08/CCMX_606_2014Q2_Report.pdf, accessed: 2014-09-18.
- COLLIARD, J.-E. AND T. FOUCAULT (2012): “Trading Fees and Efficiency in Limit Order Markets,” *Review of Financial Studies*, 25, 3389–3421.
- COMERTON-FORDE, C. AND T. J. PUTNIŃŠ (2013): “Dark Trading and Price Discovery,” *Available at SSRN 2183392*.
- COPELAND, T. E. AND D. GALAI (1983): “Information Effects on the Bid-Ask Spread,” *The Journal of Finance*, 38, 1457–1469.
- DAVIS, J. L. AND L. E. LIGHTFOOT (1998): “Fragmentation versus Consolidation of Securities Trading: Evidence from the Operation of Rule 19c-3,” *JL & Econ.*, 41, 209.
- DEGRYSE, H., F. DE JONG, AND V. VAN KERVEL (2014): “The Impact of Dark Trading and Visible Fragmentation on Market Quality,” *Working Paper*.
- ECONOMIDES, N. AND A. SIOW (1988): “The division of markets is limited by the extent of liquidity (spatial competition with externalities),” *The American Economic Review*, 108–121.
- FIDESSA GROUP PLC (2014): “Fidessa Fragmentation Index, Australia,” <http://>

- fragmentation.fidessa.com/australia/, accessed: 2014-09-11.
- FINANCIAL INDUSTRY REGULATORY AUTHORITY (2014): “ATS Transparency Data,” <https://ats.finra.org>, accessed: September 12, 2014.
- FINK, J., K. E. FINK, AND J. P. WESTON (2006): “Competition on the Nasdaq and the Growth of Electronic Communication Networks,” *Journal of Banking & Finance*, 30, 2537–2559.
- FORESIGHT (2012): “The Future of Computer Trading in Financial Markets,” The Government Office for Science, London.
- FOUCAULT, T. AND A. J. MENKVELD (2008): “Competition for Order Flow and Smart Order Routing Systems,” *The Journal of Finance*, 63, 119–158.
- GAJEWSKI, J.-F. AND C. GRESSE (2007): “Centralised Order Books Versus Hybrid Order Books: A Paired Comparison of Trading Costs on NSC (Euronext Paris) and SETS (London Stock Exchange),” *Journal of Banking & Finance*, 31, 2906–2924.
- GILL, P. E., W. MURRAY, AND M. A. SAUNDERS (2008): “User’s Guide for SNOPT Version 7: Software for Large-Scale Nonlinear Programming,” <http://web.stanford.edu/group/SOL/guides/sndoc7.pdf>.
- GLOSTEN, L. R. AND P. R. MILGROM (1985): “Bid, Ask and Transaction Prices in a Specialist Market with Heterogeneously Informed Traders,” *Journal of Financial Economics*, 14, 71–100.
- GOLDBLATT, R. (1998): *Lectures on the Hyperreals: An Introduction to Nonstandard Analysis*, Springer.
- KCG HOLDINGS, INC. (2013): “Form 8-K,” <http://www.sec.gov/Archives/edgar/data/1569391/000119312513438413/d625930d8k.htm>.
- KNIGHT HOLDCO, INC. (2013): “Form S-4 Registration Statement,” <http://www.sec.gov/Archives/edgar/data/1569391/000119312513053260/d484578ds4.htm#toc>.

- KÖRBER, L., O. LINTON, AND M. VOGT (2013): “The Effect of Fragmentation in Trading on Market Quality in the UK Equity Market,” *Working Paper*.
- KYLE, A. S. (1985): “Continuous Auctions and Insider Trading,” *Econometrica*, 53, 1315–1335.
- MADHAVAN, A. (1992): “Trading Mechanisms in Securities Markets,” *the Journal of Finance*, 47, 607–641.
- MENDELSON, H. (1987): “Consolidation, Fragmentation, and Market Performance,” *Journal of Financial and Quantitative Analysis*, 22, 189–207.
- MENKVELD, A. J. (2013): “High Frequency Trading and the *New-Market Makers*,” *Journal of Financial Markets*, 16, 712–740.
- (2014): “High Frequency Traders and Market Structure,” *The Financial Review*.
- MOSTOWFI, S. (2014): “US Dark Pools to Recede in Year Ahead,” <http://www.tabbforum.com/opinions/us-dark-pools-to-recede-in-year-ahead>, accessed: September 12, 2014.
- NYSE EURONEXT (2014): “Historical Monthly Volume,” https://www.nyse.com/attachment/Historical_Volume.xls, accessed: 2014-09-11.
- O’HARA, M. AND M. YE (2011): “Is Market Fragmentation Harming Market Quality?” *Journal of Financial Economics*, 100, 459–474.
- PAGANO, M. (1989): “Trading Volume and Asset Liquidity,” *The Quarterly Journal of Economics*, 104, 255–274.
- PAGNOTTA, E. AND T. PHILIPPON (2013): “Competing on Speed,” *Working Paper*.
- PETERFFY, T. (2014): “Interactive Brokers Group Proposal to Address High Frequency Trading,” Open Letter to SEC.
- PORTER, D. C. AND J. G. THATCHER (1998): “Fragmentation, Competition, and Limit Orders: New Evidence from Interday Spreads,” *The Quarterly Review of Economics and*

- Finance*, 38, 111–128.
- ROBINSON, A. (1966): *Non-Standard Analysis*, Princeton University Press.
- SALOP, S. C. (1979): “Monopolistic competition with outside goods,” *The Bell Journal of Economics*, 141–156.
- SAMELSON, M. (2012): *Dark Pools: Characteristics, Operation and Liquidity*, Woodbine Associates, Capital Markets Research and Consulting.
- SCHNEIDERMAN, E. (2014): “Remarks on High-Frequency Trading & Insider Trading 2.0,” http://www.ag.ny.gov/pdfs/HFT_and_market_structure.pdf.
- STATE STREET CORPORATION (2014): “SPDR S&P/ASX 200 Fund, Daily Fund Update,” <http://www.asx.com.au/asxpdf/20140904/pdf/42s0ny9stt36xg.pdf>.
- TD AMERITRADE, INC. (2014, Q2): “SEC Rule 606 Report,” https://www.tdameritrade.com/retail-en_us/resources/pdf/AMTD2055.pdf, accessed: 2014-09-18.
- U.S. SECURITIES AND EXCHANGE COMMISSION (2005): “Regulation NMS: Final Rules and Amendments to Joint Industry Plans,” *Federal Register*, 70.
- (2010): “Concept Release on Equity Market Structure,” *Release No. 34-61358*.
- (2014): “SEC vs. Latour Trading LLC and Nicolas Niquet,” *Release No. 73125*, 70.
- WAH, E. AND M. P. WELLMAN (2013): “Latency Arbitrage, Market Fragmentation, and Efficiency: A Two-Market Model,” in *Proceedings of the Fourteenth ACM Conference on Electronic Commerce*, ACM, 855–872.
- WHITE, M. J. (2014): “Enhancing Our Equity Market Structure,” <http://www.sec.gov/News/Speech/Detail/Speech/1370542004312>, remarks at Sandler O’Neill & Partners, L.P. Global Exchange and Brokerage Conference, New York, N.Y.
- ZHU, H. (2014): “Do Dark Pools harm Price Discovery?” *Review of Financial Studies*, 27, 747–789.