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**Comments on:
Liquidity of US dollars in Tokyo
market: Comparison with London and
New York, and its Implications for
Asian Financial Policy
by Shin-ichi Fukuda**

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Main points

- Paper deals with an important issue—the implications for Asia of a dollar-centric global foreign exchange system in a period of financial crisis outside the region, focusing on Asian experience during the GFC
- Contributions:
 - Provides historical data on usage of major currencies in global FX markets
 - Identifies relative performance of Asian currencies and Tokyo, New York and London FX and interbank markets during GFC using covered interest parity, counterparty risk and market liquidity analyses
 - Provides explanations for this performance
 - Suggests policies to mitigate reliance on US dollar in FX market

Structural Features of Asian FX Market

- Double mismatches—currency and maturity
 - But this less of an issue than before Asian Crisis period
 - “Reverse flow” to a large extent reflects currency intervention
- Heavy reliance on US dollar for intra-regional transactions.
- Transaction volume in Asia & Pacific markets much thinner than in London and New York markets
 - London (37%), New York (18%)
 - Tokyo (6.2%), Singapore (5.3%), Hong Kong, China (4.7%)
 - Makes them vulnerable in times of crisis

Covered Interest Parity and Counterparty Risk Analyses

- Deviations from CIP were larger for Asian currencies than European currencies, even though no crisis in Asia
 - Could be explained by less market liquidity and high dependence on US dollar transactions, unlike Europe
- Deviations from CIP larger in the Tokyo market than in London and New York after the Lehman shock
 - Less market liquidity, London and NY closed
 - But differences rather small
 - No necessary connection with relative health of Japanese financial institutions, since FX markets are global
- Credit spreads for European financial institutions much wider than for Japanese institutions, as would be expected, but counterparty credit risk depends on currency denomination

Policy Recommendations

- Regional coordination to avoid shocks of dollar shortage
 - Fed swap lines cannot be relied on in advance
 - Bilateral swap agreements (already in place)
 - CMIM enhancements
 - Scale can be expanded further beyond \$240 bn
 - Kinds of lending programs being increased
 - Conditionality remains a problem, although is gradually easing
- Other points
 - CMIM issues
 - Disbursement process has not yet been tested
 - AMRO needs to be strengthened
 - Need to reduce dependence on dollar funding
 - Asian Bond Markets Initiative
 - Asia Financial Stability Dialogue

Conclusions

- Important topic given vulnerability of Asia to US dollar shortages stemming from shocks outside of the region
- Findings show the vulnerability of the Tokyo FX market to reduced dollar liquidity despite lack of crisis within the region
 - Useful to analyze actual costs resulting from dollar shortage
 - Useful to extend analysis to Hong Kong, Singapore
- Policy recommendations to expand regional coordination
 - Are current CMIM and regional bilateral swaps enough?
 - If not, how much more is needed?
 - How to encourage greater local currency funding—this is already a well-covered topic
 - Any comments about rising role of RMB?

Thank you

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