Navigating the Financial Regulator’s Impossible Trinity

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Generals fight the last war, regulators prevent the last crisis.

- In order to prevent privatization of gains and socialization of losses, force banks to hold sufficient amount of high-quality capital, so that taxpayers’ money need not be used.
  — *But is this the correct lesson?*

- "Those of us who have looked to the self-interest of lending institutions to protect shareholders' equity (myself especially) are in a state of shocked disbelief" Then FRB Chairman Alan Greenspan (Congressional testimony October 23, 2008)
- “…as long as the music is playing, you’ve got to get up and dance. We’re still dancing” Citigroup then Chairman, Chuck Prince (FT July 9, 2007)

*Interests of financial institutions managers, employees and shareholders are not necessarily aligned with broader interest of the society.*
Pre-GFC

Economic Capital > Regulatory Capital

• Common regulatory capital rules designed as minimum capital standard to identify deteriorating banks that might resort to gambling for resurrection. (Prompt Corrective Action for deteriorating banks.)
• Tier 2 to absorb losses for failed institutions.
• Possible to set same standard globally despite differences in business models and economic/market conditions.
• Increasing use of internal models: trust that banks understand their own risks best. (Incentive compatibility.)
• Safety net for small savers and systemic events. (99% confidence interval)

However,
• Significant lag in reported capital adequacy numbers. Losses on assets don’t emerge gradually.
• Tier 2 capital not able to absorb losses when bank liquidation is not a usable option. Liquidation value are also usually well below going concern value.
• Banks and shareholders have no incentive to set aside capital for tail risk. (Economic capital does not anticipate extreme events.)
• Massive costs for the safety net because tail is much fatter and longer than supposed.
• Globalization of financial activity means crisis spillovers and cross-border leakages of fiscal backstop.

Large demand on the safety net.
Post GFC: Never Again!
Strengthen capital requirements to minimize cost to safety net

1. **Economic Capital > Regulatory Capital**
   (Increase in RC small or regulatory arbitrage allows circumvention)
   → No improvement in stability.

2. **Economic Capital < Regulatory Capital**
   → No reason to be in the business; business model will adjust until Economic Capital ≥ Regulatory Capital
   - Increase margin (negatively affects economic activity)
     • Product differentiation to increase margin difficult, so must come from reduced overall supply
     • Disintermediation and competition from non-regulated intermediaries (Helps mitigate effect on economic activity, but source of instability shifts to shadow banking sectors.)
   - Shift to high-risk, high-return business (if capital charge on them are low)
     • Greater and wider tail risk
   - Restriction on activity (Volker, etc.) to limit the size of tail events
     • Helps limit cross-subsidization of risk capital?

But common global standards could mean that RC that is (ex-ante) lower than EC for one country may be higher than EC in another. To ensure that common standard provides a level playing field requires extremely detailed regulation and a high degree of calibration.
Illustrative response to stricter capital requirement

Initial expected distribution of net profit with non-binding regulatory capital.

Initial target ROE:
$$ROE = \frac{OR}{OK^E}$$

Target ROE with stricter capital requirement:
$$ROE' = \frac{OR'}{OK^R} > ROE$$

Expected distribution of net profit after strengthened capital requirement.

Probability of outcome
Have cake and eat it too? Impossible trinity of financial regulation.

Capital mobility

Globalization
(common rules, cross-border activity)

Fixed exchange rate

Independent monetary policy

Stability
(regulation, LOLR, fiscal backstop)

Functionality & Efficiency
(liberalization, competition)

(Impossible trinity in exchange rate regime.)
Striking an appropriate balance: No happy middle ground?

- Globalization
- Regulators’ Nirvana
- Pre GFC
- Consultants’ Paradise
- Stability
- Functionality & Efficiency
- Fragmentation
Thank you.