The High-Frequency Trading Arms Race: Frequent Batch Auctions as a Market Design Response

Eric Budish, Peter Cramton and John Shim

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- Not tunnels, but microwaves (first 10ms, then 9ms, now 8ms).
- Analogous races occurring throughout the financial system, sometimes measured as finely as microseconds or nanoseconds.
The HFT Arms Race: Microwaves in Europe
The HFT Arms Race: Market Design Perspective

- We examine the HFT arms race from the perspective of market design.
  - We assume that HFT’s are optimizing with respect to market rules as they’re presently given
  - But, ask whether these are the right rules
    - Avoids much of the “is HFT good or evil?” that seems to dominate the discussion of HFT
    - Instead, ask at a deeper level what is it about market design that incentivizes arms race behavior, and is this design optimal
  - Central point: HFT arms race is a symptom of a basic flaw in modern financial market design: continuous-time trading.
  - Proposal: discrete-time trading.
    - Replace continuous-time limit order books with discrete-time frequent batch auctions: uniform-price double auctions conducted at frequent but discrete time intervals, e.g., every 1 second or 100ms.
Frequent Batch Auctions

A simple idea: discrete-time trading.

1. Direct-feed millisecond level data from exchanges: continuous market violates basic asset pricing principles at HFT time horizons.
   ▶ Market correlations completely break down.
   ▶ Frequent mechanical arbitrage opportunities.
   ▶ Mechanical arbs \(\rightarrow\) arms race. Arms race does not compete away the arbs, looks like a “constant”.

2. Theory model: critique of the CLOB market design.
   ▶ Mechanical arbs are “built in” to the market design. Sniping.
   ▶ Harms liquidity (spreads, depth).
   ▶ Induces a never-ending, socially wasteful, arms race for speed.

3. Frequent Batch Auctions as a market design response
   ▶ Competition on speed \(\rightarrow\) competition on price.
   ▶ Eliminates mechanical arbs and sniping. Stops the arms race.
   ▶ Enhances liquidity and social welfare.
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Brief Description of the Continuous Limit Order Book

- Basic building block: limit order
  - Specifies a price, quantity, and buy/sell (bid/ask)
  - “Buy 100 shares of XYZ at $100.00”
- Traders may submit limit orders to the market at any time during the trading day
  - Also may cancel or modify outstanding limit orders at any time
  - Orders and cancelations are processed by the exchange one-at-a-time in order of receipt (serial process)
- Set of outstanding orders is known as the limit order book
- Trade occurs whenever a new limit order is submitted that is either (i) bid ≥ lowest ask; (ii) ask ≤ highest bid
  - New limit order is interpreted as accepting (fully or partially) one or more outstanding orders
Data

- “Direct feed” data from Chicago Mercantile Exchange (CME) and New York Stock Exchange (NYSE)
  - Gives “play by play” of limit order book
  - Millisecond resolution time stamps
  - These are the data HFT firms subscribe to and parse in real time

- Focus primarily on a pair of securities that track the S&P 500 index
  - ES: E-Mini S&P 500 Future, traded on CME
  - SPY: SPDR S&P 500 Exchange Traded Fund, traded on NYSE (and other equities exchanges)

- Time period: 2005-2011
Market Correlations Break Down at High Frequency

ES vs. SPY: 1 Day
Market Correlations Break Down at High Frequency
ES vs. SPY: 1 hour

Index Points (ES)
Index Points (SPY)

Time (CT)
Market Correlations Break Down at High Frequency

ES vs. SPY: 1 minute
Market Correlations Break Down at High Frequency
ES vs. SPY: 250 milliseconds
Arb Durations over Time: 2005-2011

Median over time

Distribution by year
Arb Per-Unit Profits over Time: 2005-2011

Median over time

Distribution by year
Arb Frequency over Time: 2005-2011

Frequency over time

Frequency vs. Volatility
Correlation Breakdown Over Time: 2005-2011
Arms Race is a “Constant” of the Market Design

- Results suggest that the arms race is a mechanical “constant” of the continuous limit order book.
  - Rather than a profit opportunity that is competed away over time
- Correlation Breakdown
  - Competition does increase the speed with which information is incorporated from one security price into another security price
  - Competition does not eliminate correlation breakdown
- Mechanical arbitrage
  - Competition does increase the speed requirements for capturing arbs (“raises the bar”)
  - Competition does not reduce the size or frequency of arb opportunities
- These facts both inform and are explained by our model
Total Size of the Arms Race Prize

- Estimate annual value of ES-SPY arbitrage is $75mm (we suspect underestimate, details in paper)
- And ES-SPY is just the tip of the iceberg in the race for speed:

1. Hundreds of trades very similar to ES-SPY: highly correlated, highly liquid
2. Fragmented equity markets: can arbitrage SPY on NYSE against SPY on NASDAQ! Even simpler than ES-SPY.
3. Correlations that are high but far from one can also be exploited in a statistical sense. Example: GS-MS
4. Race to top of book (artifact of minimum price tick)
5. Race to respond to public news (eg Business Wire, Fed)

We don’t attempt to put a precise estimate on the total prize at stake in the arms race, but common sense extrapolation from our ES-SPY estimates suggest that the sums are substantial
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Simple new model which is motivated by, and helps to explain, these empirical facts. The model serves two related purposes

1. Critique of the continuous limit order book market design
2. Identifies the economic implications of the HFT arms race
Model: Preliminaries

- There is a security, $x$, that trades on a continuous limit-order book market
- There is a publicly observable signal, $y$, of the value of security $x$
- Purposefully strong assumption:
  - Fundamental value of $x$ is \textit{perfectly} correlated to the public signal $y$
  - $x$ can always be costlessly liquidated at this fundamental value
- “Best case” scenario for price discovery and liquidity provision in a continuous limit order book
  - No asymmetric info, inventory costs, etc.
- We think of $x$ and $y$ as a metaphor for pairs or sets of securities that are highly correlated
  - Ex: $x$ is SPY, $y$ is ES
  - Ex: $x$ is SPY on NYSE (NASDAQ, dark pools, etc.), $y$ is SPY on BATS
Evolution of $y$

- The signal $y$ evolves as a compound Poisson jump process
- Arrival rate $\lambda_{\text{jump}}$
- Jump distribution $F_{\text{jump}}$
  - Finite support
  - Symmetric with mean zero
- Let $J$ denote the random variable formed by drawing randomly according to $F_{\text{jump}}$, and then taking the absolute value.
  - The “jump size” distribution
Players: Investors and Trading Firms

Investors

- Represent end users of financial markets: mutual funds, pension funds, hedge funds, etc.
- Since there is no asymmetric information about fundamentals, could be called “liquidity traders” or “noise traders”
- Arrive stochastically to the market with an inelastic need to either buy or sell 1 unit of x
- Poisson arrival rate is $\lambda_{\text{invest}}$. Equal probability of need to buy vs. need to sell
- Mechanical strategy: trade at market immediately upon arrival
  - This is microfounded in the paper (all else equal prefer to transact sooner rather than later; assume that investors act only as “takers” of liquidity, not “makers”; investors not fast enough to snipe)
Players: Investors and Trading Firms

Trading Firms

- Equivalently: HFTs, market makers, algorithmic traders
- No intrinsic demand to buy or sell \( x \)
- Their goal in trading is simply to buy \( x \) at prices lower than \( y \) and sell at prices higher than \( y \). Payoffs:
  - Buy \( x \) at price \( p \) at time \( t \): earn \( y_t - p \)
  - Sell \( x \) at price \( p \) at time \( t \): earn \( p - y_t \)
- Objective is to maximize profits per unit time
- Entry
  - Initially: \# of trading firms is exogenous, \( N \geq 2 \)
  - Below, we will endogenize entry
Latency

Exogenous entry case

- No latency in observing $y$
  - Trading firms observe innovations in the signal $y$ with zero time delay, for free.
- No latency in submitting orders to the exchange
  - If multiple orders reach the market at the same time, the order in which they are processed is random (serial processing)
  - Alternatively, orders are transmitted with small random latency, and processed in order of receipt (eg, colocation)
- Again, best case scenario for CLOB

Endogenous entry case

- Will add latency in observing $y$
“Sniping”

- Given the model setup – no asymmetric information, no inventory costs, everyone risk neutral – one might conjecture that (Bertrand) competition among trading firms leads to effectively infinite liquidity for investors
  - That is, trading firms should offer to buy or sell $x$ at price $y$ in unlimited quantity at zero bid-ask spread
- But that is not what happens in the CLOB market design, due to a phenomenon we call “sniping”
“Sniping”

- Suppose $y$ jumps, e.g., from $y$ to $\tilde{y}$
  - This is the moment at which the correlation between $y$ and $x$ temporarily breaks down
- Trading firms providing liquidity in the market for $x$ send a message to the CLOB
  - Withdraw old quotes based on $y$
  - Replace with new quotes based on $\tilde{y}$
“Sniping”

- However, at the exact same time, other trading firms send a message to the CLOB attempting to “snipe” the stale quotes before they are adjusted
  - Buy at the old quotes based on \( y \), before these quotes are withdrawn
- Since the CLOB processes messages in \textit{serial} – that is, one at a time – it is possible that a message to snipe a stale quote will get processed before the message to adjust the stale quote
- In fact, not only possible but \textit{probable}
  - For every 1 liquidity provider trying to get out of the way
  - \( N - 1 \) other trading firms trying to snipe him
  - Hence, when there is a big jump, liquidity provider gets sniped with probability \( \frac{N-1}{N} \)
“Sniping”

- Hence, in a CLOB, *symmetrically observed public information creates arbitrage rents*.
  - Obvious mechanical arbitrages are not supposed to exist in an efficient market (Fama, 1970)
  - Closely associated with correlation breakdown phenomenon
  - Missed by extant literature
  - Mechanically very similar to Glosten-Milgrom (1985) adverse selection, but caused by the market design not asymmetric information
    - Interpretation: Glosten-Milgrom adverse selection is “built in” to the market design
    - Symmetrically observed information is processed by the market as if it were asymmetric (i.e. no such thing as symmetric information, at least during mkt hours)
  - In equilibrium, gets passed on to investors
Equilibrium, Exogenous Entry

The unique static Nash equilibrium is described as follows:

- **Investors:** trade immediately when their demand arises, buying or selling at the best available ask or bid, respectively.

- **Trading Firms:** of the $N$ trading firms, 1 plays a role we call “liquidity provider” and $N - 1$ play a role we call “stale-quote sniper”.

- **Liquidity provider**
  - Maintain a bid and ask for 1 unit of $x$ at spread of $s > 0$, derived below (stationary)
  - If $y_t$ jumps, send a message to cancel old quotes and replace with new quotes

- **Snipers**
  - if $y_t$ jumps such that $y_t > y_{t-} + \frac{s}{2}$ or $y_t < y_{t-} - \frac{s}{2}$, attempt to trade at the stale quote (“immediate or cancel”)

- **Trading firms are indifferent between these two roles in equilibrium.** (Eqm is unique up to sorting into roles)
Equilibrium Bid-Ask Spread

In equilibrium, the bid-ask spread is such that trading firms are indifferent between liquidity provision and sniping.

- Return to liquidity provision
  - Benefits: \( \lambda_{\text{invest}} \cdot \frac{s}{2} \)
  - Costs: \( \lambda_{\text{jump}} \cdot \Pr(J > \frac{s}{2}) \cdot \mathbb{E}(J - \frac{s}{2} | J > \frac{s}{2}) \cdot \frac{N-1}{N} \)

- Return to sniping
  - Benefits: \( \lambda_{\text{jump}} \cdot \Pr(J > \frac{s}{2}) \cdot \mathbb{E}(J - \frac{s}{2} | J > \frac{s}{2}) \cdot \frac{1}{N} \)

- Indifference condition:
  \[
  \lambda_{\text{invest}} \cdot \frac{s^*}{2} = \lambda_{\text{jump}} \cdot \Pr(J > \frac{s^*}{2}) \cdot \mathbb{E}(J - \frac{s^*}{2} | J > \frac{s^*}{2}) \cdot \frac{1}{N} \quad (1)
  \]

- Uniquely pins down \( s \). Interpretation:
  - LHS: revenue from investors due to non-zero bid-ask spread
  - RHS: rents to trading firms from mechanical arbitrages
Remark: Thin Markets

- What happens if investors sometimes need to trade 1 unit but sometimes need to trade 2 units?
- If the liquidity provider provides a quote with depth 2 at the same bid-ask spread as above
  - Benefits scale less than linearly with quote size: sometimes investors only want 1
  - Costs scale linearly with quote size: if get sniped, get sniped for the whole amount!
- Hence, equilibrium bid-ask spread is wider for second unit than first
- Not only is there a positive bid-ask spread even without asymmetric information about fundamentals, but markets are thin too
Equilibrium, Endogenous Entry

- Now, endogenize entry.
  - Trading firms observe the signal $y$ with a small time delay, $\delta_{\text{slow}} > 0$, for free
  - Can pay a cost $c_{\text{speed}}$ to reduce latency from $\delta_{\text{slow}}$ to $\delta_{\text{fast}}$, with $0 \leq \delta_{\text{fast}} < \delta_{\text{slow}}$. Let $\delta = \delta_{\text{slow}} - \delta_{\text{fast}}$

- Equilibrium
  - Very similar structure to above: 1 liquidity provider, $N - 1$ stale-quote snipers
  - $N$ now endogenous: the number of fast traders (for simplicity, allow $N$ real not integer. mild assumption on $c_{\text{speed}}$ ensures $N \geq 2$ in eqm)
  - Fast traders are indifferent between two roles as above
  - Fast traders earn zero profits (could generalize to give inframarginal fast traders positive profits)
  - No role for slow traders in equilibrium
Equilibrium, Endogenous Entry

- Zero-profit condition for liquidity provider

\[ \lambda_{\text{invest}} \cdot \frac{s}{2} - \lambda_{\text{jump}} \cdot \Pr(J > \frac{s}{2}) \cdot \mathbb{E}(J - \frac{s}{2} | J > \frac{s}{2}) \cdot \frac{N - 1}{N} = c_{\text{speed}} \] (2)

- Zero-profit condition for stale-quote snipers

\[ \lambda_{\text{jump}} \cdot \Pr(J > \frac{s}{2}) \cdot \mathbb{E}(J - \frac{s}{2} | J > \frac{s}{2}) \cdot \frac{1}{N} = c_{\text{speed}} \] (3)

- Together, equations (2) and (3) describe equilibrium, by uniquely pinning down the bid-ask spread \( s^* \), the total entry of trading firms \( N^* \), and the indifference of trading firms between the two roles they might play.
Equilibrium, Endogenous Entry

- Adding (2) and \(N - 1\) times (3) yields

\[
\lambda_{\text{invest}} \cdot \frac{S^*}{2} = N^* \cdot c_{\text{speed}}
\]  

(4)

- Economic interpretation: all of the expenditure by trading firms on speed technology ultimately is borne by investors, via the bid-ask spread.
  - Arms-race prize = expenditures on speed = cost to investors
  - Remember: arms-race profits have to come from somewhere
What’s the Market Failure?

Chicago question: isn’t the arms race just healthy competition? what’s the market failure?
What’s the Market Failure?

Market Failure 1: Sniping

- Mechanical arb opportunities are “built in” to CLOB market design
- These arb opportunities violate weak-form EMH (Fama, 1970)
  - Market looks highly efficient in time space, but it isn’t efficient in volume space
- Arbs create rents from symmetrically observed public information

Market Failure 2: Arms Race

- The arb rents then induce an arms race for speed
- Mathematically, a prisoners’ dilemma
Remarks on the Equilibrium

Arms Race is a “constant”

- Arms race prize = expenditures on speed = cost to investors
  = \( \lambda_{\text{jump}} \cdot \Pr(J > \frac{s^*}{2}) \cdot \mathbb{E}(J - \frac{s^*}{2} | J > \frac{s^*}{2}) \)

- Comparative static: the negative effects of the arms race on liquidity and welfare do not depend on either
  - the cost of speed (if speed is cheap, there will be more entry)
  - the magnitude of speed improvements (seconds, milliseconds, microseconds, nanoseconds, ...)

- The problem we identify is an equilibrium feature of continuous limit order books
  - not competed away as HFTs get faster and faster
  - ties in nicely with empirical results
Remarks on the Equilibrium

Role of HFTs

- In our model HFTs endogenously perform two functions
  - Useful: liquidity provision / price discovery
  - Rent-seeking: sniping stale quotes

- HFTs are indifferent between these two roles in equilibrium of our model

- The rent-seeking seems like zero-sum activity among HFTs
  - but we show that it ultimately harms real investors

Clarification

- Our results do not imply that on net HFT has been bad for liquidity or social welfare
- Our results say sniping is bad for liquidity and the speed race is socially wasteful
- Frequent batch auctions preserve (in fact, enhance) the useful function that HFTs perform while eliminating sniping and the speed race
Remark: Empirical Evidence of Effect of HFT on Liquidity Consistent with “IT Good, Speed Race Bad”

Virtu IPO Filing (Spreads)

Angel, Harris and Spatt (Cost to Trade Large Blocks)
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Frequent Batch Auctions: Overview

- High level: analogous to a CLOB, but for two key differences
  - Time is treated as discrete, not continuous
  - Orders are processed in batch, not serial
Frequent Batch Auctions: Definition

- The trading day is divided into equal-length discrete batch intervals, each of length $\tau > 0$.
- During the batch interval traders submits bids and asks
  - Can be freely modified, withdrawn, etc.
  - If an order is not executed in the batch at time $t$, it automatically carries over for $t + 1, t + 2, \ldots$,
- At the end of each interval, the exchange “batches” all of the outstanding orders, and computes market-level supply and demand curves
- If supply and demand intersect, then all transactions occur at the same market-clearing price (“uniform price”)
  - Priority: still price-time, but treat time as discrete. Orders submitted in the same batch interval have the same priority. Rationing is pro-rata.
- Information policy: orders are not visible during the batch interval. Aggregate demand and supply are announced at the end.
  - Analogous to current practice under the continuous limit-order book
Frequent Batch Auctions: Illustrated

(a) Case 1: No Trade

(b) Case 2: Trade
Why Batching Solves the Problems with Continuous-time

Reason 1: frequent batch auctions reduce the economic relevance of tiny speed advantages $\Rightarrow$ no more arms race.

- Consider a slow trader who attempts to provide liquidity to investors
- There is 1 fast trader present in the market
- Continuous market: liquidity provider is vulnerable to being sniped by the fast trader for all jumps in $y$.
- Discrete market: liquidity provider is vulnerable to being sniped by the fast trader for only $\frac{\delta}{\tau}$ proportion of jumps in $y$: 

![Diagram showing batch timing]
Why Batching Solves the Problems with Continuous-time

Reason 2: frequent batch auctions change the nature of competition: from competition on speed to competition on price
→ no more sniping

- As above, suppose a slow trader attempts to provide liquidity to investors
- There are $N \geq 2$ fast traders present in the market (exogenously)
- Suppose $y$ jumps in the interval $[\tau - \delta_{\text{slow}}, \tau - \delta_{\text{fast}}]$ where the liquidity provider is vulnerable.
- All of the fast traders wish to exploit the stale quote ... but this means that Bertrand competition drives the price of $x$ to the new, correct level
- No longer can make money from symmetrically observed public information.
Why Batching Solves the Problems with Continuous-time

- Another way to think about these two points:
  - Batching dramatically reduces the likelihood that tiny speed advantages lead to (economically relevant) asymmetric information
  - Batching eliminates rents from symmetrically observed information

- N.B.: with batch intervals of e.g. 100 ms, there is still plenty of scope for market participants to develop genuinely asymmetric information about security values, for which they would earn a rent.
  - Batching just eliminates rents from information that many observe at basically the same time and understand equally well.
Equilibrium of Frequent Batch Auctions, Exogenous Entry

- $N \geq 2$ fast traders, exogenously in the market, any $\tau > 0$
- Description of equilibrium:
  - Bertrand competition drives bid-ask spread to zero, effectively infinite depth
  - No sniping
  - Fast traders earn zero gross profits (do not recover costs, treated as sunk)
- Highlights the central differences between frequent batching and CLOB
  - No rents from symmetrically observed public information
  - No mechanical arbitrage opportunities
  - Bertrand competition on price drives spread to zero, as expected given model setup
- May also be useful for thinking about the transition to frequent batch auctions (some fast traders already present in the market with sunk costs in speed technology)
Equilibrium of Frequent Batch Auctions, Endogenous Entry

- Description of equilibrium
  - If $\tau$ sufficiently long relative to $\delta$, then in equilibrium no trading firms pay $c_{\text{speed}}$ to be $\delta$ faster
  - Slow trading firms provide $\bar{Q}$ units of liquidity at zero-bid ask spread

- Key condition: not worth it for a fast trader to enter to pick off the slow traders:
  \[
  \frac{\delta \lambda_{\text{jump}}}{\tau} E(J) \cdot \bar{Q} < c_{\text{speed}}
  \]

- The fraction $\frac{\delta \lambda_{\text{jump}}}{\tau}$ is the proportion of time during the trading day during which the fast trader has a profitable sniping opportunity.

- For any finite $\bar{Q}$, the condition is satisfied for long enough $\tau$.
  - Hence, any desired market depth can be provided by slow traders at zero cost if the batch interval is sufficiently long.
How Long is Long Enough to Stop the Speed Race

Very rough calibration of $\tau$, using annual ES-SPY arbitrage estimates and other sources

$$\frac{\delta \lambda_{\text{jump}}}{\tau} E(J) \cdot \bar{Q} < c_{\text{speed}}$$

- $\delta$: speed difference between state of the art HFT in 2014 and state of the art in 2013.
  - ES/SPY: $\leq$ 100 microseconds (.0001 seconds)
  - Equities: $\leq$ 10 microseconds

- $\lambda_{\text{jump}}$: number of arbitrage opportunities, annualized
  - ES/SPY: 200,000 (800 per day)

- $E(J)$: size of each arb opportunity
  - ES/SPY: in data, 0.01 per share

- We expect frequent batch auctions to narrow the bid-ask spread, so to be conservative double $\lambda_{\text{jump}} \cdot E(J)$
How Long is Long Enough to Stop the Speed Race

Very rough calibration of $\tau$, using annual ES-SPY arbitrage estimates and other sources

$$\frac{\delta \lambda_{jump}}{\tau} E(J) \cdot \bar{Q} < c_{speed}$$

- $\bar{Q}$: depth of the order book in the batch auction
  - SPY depth averages 30,000 shares in our data. We expect greater depth, so double to 60,000 shares
- $c_{speed}$, annualized
  - GETCO merger filing: $84mm$ in 2012 on colocation and data line expenses; $31mm$ on capex; $161mm$ on employee comp. Assume total cost of speed is $100mm$.
  - Assume ES/SPY is 1% of the speed race: $1m$ per year
  - ES/SPY arb: $75mm$ per year, assume 20 firms competing for prize, suggests $3.5mm$ per year
\[ \tau > \delta \lambda_{jump} E(J) \cdot \bar{Q} \frac{1}{C_{speed}} \]
\[ > 0.0001 \times (2 \times 200,000 \times 0.01) \times 60,000 \times \frac{1}{1,000,000} \]
\[ > 0.024 \text{ seconds} \]

- Extremely rough:
  - we got numbers as high as a few seconds
    - (e.g., if depth \( \bar{Q} \) is higher, or interpret \( \delta \) as HFT vs. non-HFT)
  - and as low as a few milliseconds
    - (e.g., if \( C_{speed} \) is higher, or use \( \delta \) for equities market only)

- N.B. in paper we also analyze equilibrium with \( \tau \) very short and endogenous entry
  - Liquidity provider invests in speed but nobody else does (no sniping)
  - Spreads not zero but narrower than in CLOB, welfare higher than in CLOB
Summary: Equilibrium Costs and Benefits of Frequent Batching

- Benefits
  - Enhanced liquidity
    - Narrower spreads
    - Increased depth
  - Eliminate socially wasteful arms race

- Costs
  - Investors must wait until the end of the batch interval to transact
Alternative Responses to the HFT Arms Race

- **Tobin Tax**
  - Does partially mitigate sniping
  - But: cost of tax gets passed on to investors

- **Random delay**
  - Does *not* mitigate sniping
  - Each message to snipe is like a lottery ticket
  - Explosion in message traffic

- **Message-to-trade ratios**
  - Hard to analyze
  - But: note that high message-to-trade ratios are *equilibrium* feature of CLOB

- **Minimum resting times**
  - Exacerbates sniping

- **IEX speed bump + price sliding to NBBO midpoint**
  - Ingenious, eliminates sniping
  - But, only works while IEX is small relative to the rest of the continuous market (free-rides off price discovery elsewhere)
Open Questions

- Another Chicago question: if this is such a good idea, why hasn’t an exchange already tried it? Potential reasons:
  - Relatively new problem
  - Coordination challenge
  - Regulatory ambiguities
  - Vested interests in the current market structure

- Issues due to fragmentation of US equities markets
  - What is equilibrium if there are both batch and continuous exchanges operating in parallel?
  - Mechanics if multiple exchanges each run batch (how to ensure law of one price)
  - Interaction with Reg NMS
Open Questions

- Market stability
  - Common claim among policy makers is that stopping the HFT arms race would enhance market stability (meaning vulnerability to flash crashes, exchange outages, programming glitches, etc.)
  - This is another potential welfare benefit of frequent batching, but not yet modeled

- Implementation details
  - Optimal batch interval, and how this varies by security
  - Tick sizes?
  - Circuit breakers?
  - Further details of information policy
  - Note: these questions will likely require a richer model (e.g. with asymmetric information)
New York Attorney General Speech, March 18th, 2014

We have to review, and it’s something I want to raise, and I’m sure it will be discussed at the panel, and carefully consider a proposal that I like very much. It was put forward by economists at the University of Chicago School of Business – not an enemy of free markets, the University of Chicago School of Business, by any means.

In December, they issued a detailed and thoughtful proposal for reforms that would fundamentally reorient the markets in a very simple way that would help restore confidence in them. Their proposals would reaffirm the basic concept that the best price – not the highest speed – should win.

The University of Chicago proposal – which I endorse – would, in effect, put a speed bump in place. Orders would be processed in batches after short intervals – potentially a second or less than a second in length – but that would ensure that the price would be the deciding factor in who obtains a trade, not who has the fastest supercomputer and early access to market-moving information.

This structural reform – sometimes called “frequent batch auctions” – would help catch and cap the supercomputer arms race now underway. This is tremendously important, because even advocates of high-frequency trading have always recognized that the potential for destabilization of the markets from volatility is a problem.
We must consider, for example, whether the increasingly expensive search for speed has passed the point of diminishing returns. I am personally wary of prescriptive regulation that attempts to identify an optimal trading speed, but I am receptive to more flexible, competitive solutions that could be adopted by trading venues. These could include frequent batch auctions or other mechanisms designed to minimize speed advantages. They could also include affirmative or negative trading obligations for high-frequency trading firms that employ the fastest, most sophisticated trading tools.

... 

A key question is whether trading venues have sufficient opportunity and flexibility to innovate successfully with initiatives that seek to deemphasize speed as a key to trading success in order to further serve the interests of investors.[14] If not, we must reconsider the SEC rules and market practices that stand in the way.
Bloomberg Editorial, June 18th, 2014

Today’s stock market is falling short. A wasteful arms race among high-frequency traders, the growth of dark pools (private trading venues) and assorted conflicts of interest have undermined its performance. If investors don’t trust the market, that hurts capital formation, not to mention retirement and college savings.

...

Fixing the problems will require more than a tweak here and there. One idea that’s winning converts would replace the 24-hour, continuous trading of stocks with frequent auctions at regular intervals.

Why would that help? Because it would lessen the emphasis on speed and direct more attention to the price that investors are willing to pay for stocks, given the prospects of the companies concerned, their industries and the broader economy. The high-speed arms race would subside, because shaving another millisecond off the time it takes to trade would confer no benefit.

...

Goldman Sachs Group Inc., among others, is interested enough in frequent batch auctions that it’s working with Budish to find an exchange that will conduct a pilot program and a regulatory agency that will monitor the results. Mary Jo White, the Securities and Exchange Commission chair, indicated in a June 5 speech her interest in batch auctions. She should make it a priority to conduct a test program. It’s a promising idea.
Summary

- We take a market design perspective to the HFT arms race.
- Root problem isn't "evil HFTs", it's continuous-time / serial-process trading.
- Alternative: discrete-time / batch-process trading

1. Direct-feed data: continuous-time markets don't actually work in continuous time: correlations completely break down; frequent mechanical arbs; never-ending arms race
2. Theory: root cause is the CLOB market design
   - Arms race is a never-ending, equilibrium feature of the CLOB
   - Arms race harms liquidity and is socially wasteful
3. Frequent Batch Auctions as a market design response
   - Benefits: eliminates sniping, stops arms race, enhances liquidity, computational advantages
   - Costs: investors must wait a small amount of time to trade, unintended consequences