

De-limiting Arbitrage: Evidence from the Term Asset-Backed Securities Loan Facility

(Ralf R. Meisenzahl and Karen M. Pence)

Discussion: Martin Goetz

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Disclaimer: The views expressed are my own and do not represent the views of the Deutsche Bundesbank

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(<http://www.newyorkfed.org/education/talf101.html>)
- TALF 2.0** “On March 23, 2020, the Federal Reserve established the Term Asset-Backed Securities Loan Facility (TALF) to support the flow of credit to consumers and businesses by re-enabling the issuance of ABS.”
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- Understand what role arbitrageurs (and limits to arbitrage) played
 - Exploit two (surprise) decisions by FED
 - October 2009: unexpected CMBS rejections
 - April 2020: some CMBS not eligible in TALF 2.0
 - Use information on rejected collateral and investor type(s)

Findings

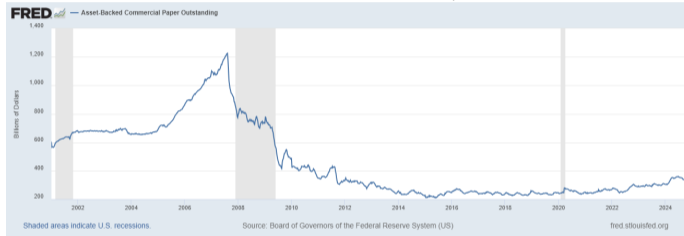
- 1 TALF2.0: TALF-eligible CMBS decreased more than non-eligible ones
consistent with theories stressing limits to arbitrage
 - 2 TALF1.0: Price of longer WAL CMBS decrease after potential rating downgrade;
TALF2.0: Price of longer WAL CMBS increase more after FED's (April) surprise announcement
consistent with dynamic limits to arbitrage models
 - 3 TALF1.0 + TALF2.0 Pledged CMBS of Hedge Funds and Mutual funds have short WAL
interpretation: arbitrageurs took less risk
 - 4 TALF1.0: Reduction of Hedge funds and mREITs after surprise rejections in October 2009
interpretation: arbitrageurs leave market after increased risk of rejection
 - 5 TALF1.0: WAL of arbitrageur-submitted CMBS increased in early 2010
interpretation: arbitrageurs increase risk-taking as outside (repo) funding became available again
 - 6 TALF1.0: Spreads of rejected CMBS increase; increase larger in earlier program period
interpretation: arbitrageurs demand less compensation for trades that consume more capital
- Very nice paper, highly recommend to read it
 - Interpreting empirical findings through the lens of theory
 - TALF Tour de force

TALF: now and then

- How comparable are TALF1.0 and TALF2.0?
 - 2009: GFC = financial shock \Rightarrow Investors/Intermediaries \Rightarrow Real economy
 - 2020: Covid = real shock \Rightarrow Real economy \Rightarrow Investors/Intermediaries

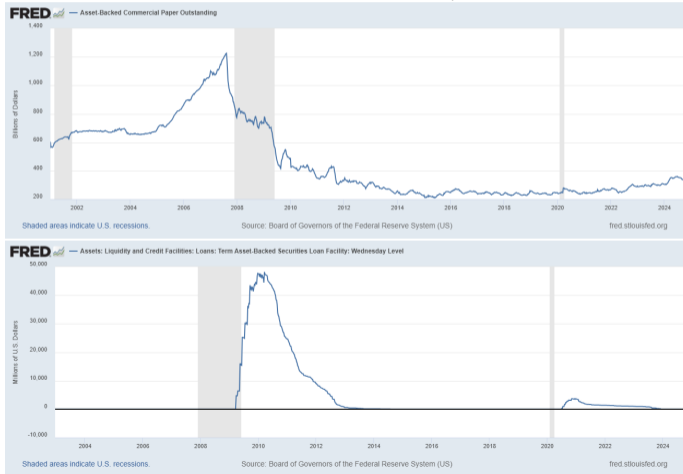
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Interpretation and Definitions

- Indirect evidence hard to link to limits to arbitrage...
 - Especially for (differential) price effects of securities
 - (Other) investor types; market frictions
 - Different markets disruptions in 2009 and 2020
 - Possible to link it closer to limits to arbitrage?
Heterogeneity across investor types/market segments, etc.
 - Dependent on classification of investors
 - Why are long-term investors not also arbitrageurs?

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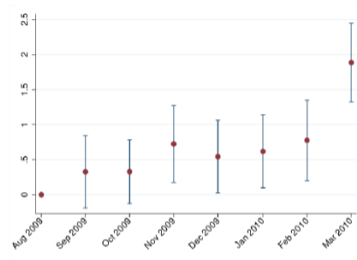
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 - Why should a limit to arbitrage only apply to arbitrageurs?
 - Why wouldn't other investor types not exploit arbitrage opportunities offered by TALF?

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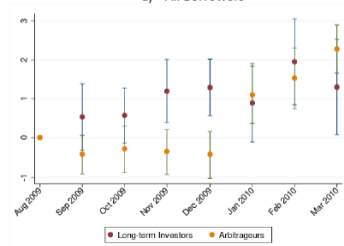
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 - Why wouldn't other investor types not exploit arbitrage opportunities offered by TALF?
- Possible to focus more on investor structure and behavior during period?
 - E.g. focus on TALF-only funds
 - Aren't they textbook arbitrageurs?
 - Important investor class (about a third of all loan requests 10/2009)

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 - Well...
 - Also: Investor composition changed → counterfactual different. How would same investor behave?

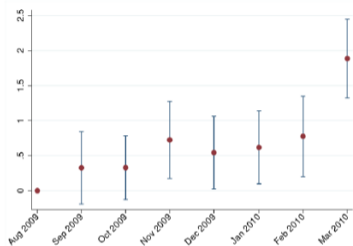


a) All Borrowers

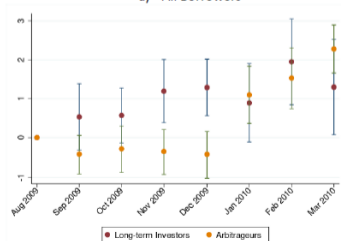


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- Evidence (Figure 6(a)): WAL of submitted CMBS increase after 10/2009
 - Well...
 - Also: Investor composition changed → counterfactual different. How would same investor behave?
- Evidence (Figure 6(b)): Increase in 10/2009 more pronounced for long-term investors
 - But shouldn't arbitrageurs respond more?



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TALF 1.0: Unexpected CMBS rejections in October

- October 5th 2009: FED announces changes to TALF-program

<https://www.federalreserve.gov/newsevents/pressreleases/monetary20091005b.htm>

- ① Expand list of Nationally Recognized Statistical Rating Organizations (NRSROs) whose ratings are accepted for determining the eligibility of ABS to be pledged as collateral at the TALF

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Rejection risk \uparrow after 10/5/2009

(There is always a referee 2 out there)

- Can you exploit pre-announcement heterogeneity in ratings?

Summary

- Nice paper!
 - Forces reader to think about economics behind programs, and how to interpret findings through lense of theory, to learn from effects.
- Good luck with the paper