

### JACOBS LEVY EQUITY MANAGEMENT CENTER

for Quantitative Financial Research

# Circuit Breakers, Illiquidity, and the COVID-19 Crisis

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## Circuit Breakers as Data-Driven Initiatives: The Flash Crash of May 6, 2010

- 1<sup>st</sup> solution: Single Stock Circuit Breakers (SSCBs)
  - In effect outside of open and close during 2010-2011
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- Problems with SSCBs:
  - Too many halts in large stocks (plus halts triggered by erroneous trades)
  - Poor reopening auctions
- 2<sup>nd</sup> solution: Limit Up Limit Down (LULD) "National Market System Plan to Address Extraordinary Market Volatility"
  - Implementation started in 2013

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• Different triggers for circuit breakers under LULD (activity in quoted prices) versus previous SSCBs (trades)

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- Do circuit breakers interfere with trading activity?

• Existing literature (mostly covers non-US and/or earlier data): conflicting results regarding the benefits of circuit breakers

#### Contribution

- I identify the economic triggers for the recent LULD circuit breakers
- I link circuit breakers-related events in (some of) the S&P500 constituents to jumps in SPY
- I estimate the effect of circuit breakers on market quality (illiquidity and price discovery)
- I document their trading interference, which leads to market fragmentation during times of market stress
- This paper has immediate policy implications for the ongoing debate on the design of the U.S. market structure mechanism and the related regulation

#### Institutional Details: The LULD Design

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- Reference price: 5-min average of transaction prices (except for periods following openings and reopenings)
  - Gets updated with the pro-forma reference price every time it deviates at least 1% from it
- Pro-forma reference price: continuously updated during the day, as a 5-min arithmetic average of the previous trade prices
- Price bands differ for two groups of securities: Tier 1 (S&P 500, the Russell 1000, and some high volume ETPs) and Tier 2 (the remainder of stocks)



#### Institutional Details: Price Bands (%)

		Previous Closing Price	During Trading Day	During Open & Close (9:30-9:45 & 15:35-16:00)
		P >\$3.00	5%	10%
	Tier1	\$0.75<=P<=\$3.00	20%	40%
Original Plan		P<\$0.75	Min(\$0.15, 75%)	Min(\$0.30, 150%)
		P >\$3.00	10%	20%
		\$0.75<=P<=\$3.00	20%	40%
	Tier 2	P<\$0.75	Min (\$0.15, 75%)	Min(\$0.30, 150%)
		Previous Closing Price	During Trading Day	During Close (15:35-16:00)
		P >\$3.00	5%	10%
	Tier1	\$0.75<=P<=\$3.00	20%	40%
After 02/24/2020		P<\$0.75	Min(\$0.15, 75%)	Min(\$0.30, 150%)
		P >\$3.00	10%	10%
	Tier 2	\$0.75<=P<=\$3.00	20%	40%
		P<\$0.75	Min (\$0.15, 75%)	Min(\$0.30, 150%)

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- Limit State: one side of the market for a security is outside the applicable price band
  - It lasts for no more than 15 seconds
  - Purpose: to keep momentary gaps in liquidity from causing a rapid and large price change

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- Trading Pause: triggered if limit state lasts 15 seconds
  - It lasts 5 minutes, and is followed by a reopening auction
  - Purpose: to facilitate fundamental price moves

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- Straddle State: one quote is outside the price bands and the stock is not in a Limit State
  - No limit on how long it can last

#### **LULD Design: Simulation**



#### LULD Reference Price and Price Bands Example

Source: Moise and Flaherty (2017)



#### **LULD Design: Simulation**

LULD Limit State and Halt State Example



Source: Moise and Flaherty (2017)

#### (Big) Data

- Nanosecond timestamped data (Daily TAQ, Daily TAQ Quote LULD)
- Daily data (SEC's Market Information and Data Analytics System, MIDAS)
- Weekly data (FINRA ATS)

- I get straddle states, non-executable quotes, limit-up states, and limit-down states from Daily TAQ quotation data
- I identify halts based on Daily TAQ Quote LULD data
- I identify dark trading activity based on FINRA ATS and Daily TAQ data
- Sample period: January 1, 2020 April 30, 2020

#### **Tier Group Statistics**

	Tier 1	Tier 2
Avg market cap (\$ 1,000)	20,091	751
Avg trading volume (1000 shares)	4,093	575
Avg dollar volume (\$ millions)	257	7
Avg closing spread (¢)	7	15
Avg trade price volatility (*10 <sup>5</sup> )	0.18	15
Avg quote volatility (*10 <sup>5</sup> )	0.01	3

#### Events by Type

		Jan 2020 – J	_	
LULD Event		Tier 1	Tier 2	
Straddle States	#Sec-Days	6,952	55,922	
	%Days w/ event	100%	100%	
Non-Exec	#Sec-Days	817	15,920	
	%Days w/ event	87%	100%	
Limit-Up	#Sec-Days	1,042	4,431	
	%Days w/ event	58%	100%	
Limit-Down	#Sec-Days	836	3,451	
	%Days w/ event	48%	100%	
#Trading Days		83	83	
#Sec w/ Events		1,272	4,814	



#### Events by Type

		Jan 2020 –	April 2020	Sept 2019 –	Dec 2019
LULD Event		Tier 1	Tier 2	Tier 1	Tier 2
Straddle States	#Sec-Days	6,952	55,922	532	15,587
	%Days w/ event	100%	100%	100%	100%
Non-Exec	#Sec-Days	817	15,920	87	4,262
	%Days w/ event	87%	100%	69%	100%
Limit-Up	#Sec-Days	1,042	4,431	15	533
	%Days w/ event	58%	100%	15%	99%
Limit-Down	#Sec-Days	836	3,451	10	366
	%Days w/ event	48%	100%	11%	99%
#Trading Days		83	83	84	84
#Sec w/ Events		1,272	4,814	132	1,630

#### Events by Type and Time of Day based on Amendment 18 to the Plan

		Tie	Tier 1		2
LULD Event		Bef Feb 24	Aft Feb 24	Bef Feb 24	Aft Feb 24
Straddle States	#Sec-Days @Open	157	4,869	4,494	39,391
	#Sec-Days Out of Open	51	2,962	3,979	26,434
Non-Exec	#Sec-Days @Open	35	560	1,418	11,753
	#Sec-Days Out of Open	3	284	538	5,349
Limit-Up	#Sec-Days @Open	0	237	29	1,101
	#Sec-Days Out of Open	5	840	235	3,314
Limit-Down	#Sec-Days @Open	0	384	7	1,005
	#Sec-Days Out of Open	2	525	144	2,525

#### Daily Number of Securities with Events at the Open



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#### **Trading Halts**

• I exclude halts that occurred in the last 10 minutes of the trading day

- I also exclude halts that do not qualify as LULD pauses:
- Halts that are not preceded by limit or straddles states
- Halts that are triggered per SEC Rule 201
- Halts that are triggered by the Market Wide Circuit Breaker (MWCB)

#### Economic Triggers for Trading Halts

• After a trading halt, the price: a) can move in the direction it moved before the halt (in line with the Plan), or b) can revert back to its pre-suspension level

#### **Economic Triggers for Trading Halts**

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- Under a), when trading resumes after the halt, I expect to see price continuation
  - Scenario consistent with an asymmetric-information hypothesis, where the arrival of fundamental information gets permanently incorporated into prices
  - The halt is a news event

#### **Economic Triggers for Trading Halts**

- After a trading halt, the price: a) can move in the direction it moved before the halt (in line with the Plan), or b) can revert back to its pre-suspension level
- Under a), when trading resumes after the halt, I expect to see price continuation
  - Scenario consistent with an asymmetric-information hypothesis, where the arrival of fundamental information gets permanently incorporated into prices
  - The halt is a news event
- Under b), when trading resumes after the halt, I expect to see price reversal
  - Scenario consistent with an inventory-control model, where dealers rebalance their positions during the halt
  - The halt is an illiquidity event

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#### **High-Frequency Price Formation**



 $dp_t = \phi_t dt + \sigma_t d W_t + k_t dq_t$ 

- $\phi_t$  is a continuous predictable drift process
- Spot volatility  $\sigma_t$  is a càdlàg process; W is a standard BM
- $q_t$  is a pure jump Lévy process with  $dq_t = 1$  if a jump occurs at time t, and 0 otherwise
- $\psi_t$  has zero mean and a finite 4<sup>th</sup> moment

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#### **Extraordinary Volatility**

• Divide each day of length *H* into *M* sub-periods ( $\delta = \frac{H}{M}$  is the distance between obs.):

$$p_{j,t} = p_{0,t} + \int_{(t-1)+(j-1)\delta}^{(t-1)+j\delta} \phi_s ds + \int_{(t-1)+(j-1)\delta}^{(t-1)+j\delta} \sigma_s dW_s + \sum_{s \le t} \Delta k_s$$

- The *j*-th intraday return:  $\tilde{r}_{j,t} = r_{j,t} + v_{j,t}$
- $r_{j,t}$  has a stochastic order of magnitude  $O_p(\sqrt{\delta})$
- $v_{j,t}$  has a stochastic order of magnitude  $O_p(1)$

$$Var(\tilde{r}_{j,t}) = Var(r_{j,t} + v_{j,t})$$

 $Var(r_{j,t})$   $Var(v_{j,t})$ 

#### Identifying the Economic Trigger for the Halts



 $dp_t = \phi_t dt + \sigma_t d W_t + k_t dq_t$ 

- I consider two time windows,  $t_1$  (before the halt) and  $t_2$  (after the halt)
- I analyze the price trends in  $t_1$  and  $t_2$

#### Price Behavior after Trading Halts

All Securities		
	Tier 1	Tier 2
Price Reversal in Sec-Days	76%	79%
Price Continuation in Sec-Days	24%	21%
Ν	311	2,539

 Trading halts occur not only to accommodate fundamental price moves (as designed), but are also (and mostly) triggered by liquidity gaps

#### Price Behavior after Trading Halts

All Securities			
	Tier 1	Tier 2	Only S&P500 Constituents
Price Reversal in Sec-Days	76%	79%	Price Reversal in Sec-Days 85%
Price Continuation in Sec-Days	24%	21%	Price Continuation in Sec-Days 15%
Ν	311	2,539	N 55

 Trading halts occur not only to accommodate fundamental price moves (as designed), but are also (and mostly) triggered by liquidity gaps

#### Relation between LULD Events and SPY Jumps

- Why is jump risk important?
  - Compared to continuous price changes, jumps have different implications for risk management, portfolio allocation, and the valuation of derivative securities

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- Why is jump risk important?
  - Compared to continuous price changes, jumps have different implications for risk management, portfolio allocation, and the valuation of derivative securities

- When constituents of the S&P500 halt, SPY continues to trade
  - When trading in the S&P500 constituents resumes, jumps may be recorded in the SPY price
  - The high-frequency arbitrage mechanism may get disrupted when S&P500 constituents halt (ex: the Mini Flash Crash of August 24, 2015)
  - Halts may lead to a dislocation between SPY and the underlying portfolio

#### **Jump Estimation**

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- Quadratic variation:  $QV_{t,t+H} = \int_{t}^{t+H} \sigma_s^2 ds + \sum_{s} \frac{k_s^2}{M}$
- Realized fundamental variation:

$$RV_{t,t+H} = \sum_{j=1}^{M} \tilde{r}_{tj}^2 \xrightarrow[M \to \infty]{p} QV_{t,t+H}$$

- M = # of 5-min sampling intervals in a trading day of length H
- Bipower variation:  $BPV_{t,t+H} = \mu^{-1} \sum_{j=k+1}^{M} |\tilde{r}_{t,j}^{M}| |\tilde{r}_{t,j-k}^{M}| \stackrel{p}{\to} \int_{t}^{t+H} \sigma_{s}^{2} ds$  $\mu^{p} = 2^{\frac{p}{2}} \Gamma\left(\frac{p+1}{2}\right) / \sqrt{\pi}$

• Jump volatility for day *t*: 
$$JV_t = \sqrt{RV_t - BPV_t} = \sqrt{\sum_{j=1}^M \tilde{r}_{t,j}^2 - \mu^{-1} \sum_{j=k+1}^M |\tilde{r}_{t,j}^M|} |\tilde{r}_{t,j-k}^M|$$

#### Daily SPY Jump Volatility



### Regression of Daily SPY Jump Volatility on LULD Events in the Constituents of S&P500

	(i)	(ii)
Intercept	1.38***	-0.31*
(adj p-value)	(0.0001)	(0.0844)
#Halts	0.53***	0.16**
(adj p-value)	(0.0001)	(0.0152)

VIX	0.06***
(adj p-value)	(0.0003)

AdjR<sup>2</sup> (%) 35.28 74.08 (Benjamini and Hochberg (1995) multiplicity-adjusted p-values in parentheses)

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### Regression of Daily SPY Jump Volatility on LULD Events in the Constituents of S&P500

	(i)	(ii)	(iii)	(iv)
Intercept	1.38***	-0.31*	1.36***	-0.31*
(adj p-value)	(0.0001)	(0.0844)	(0.0001)	(0.0839)
#Halts	0.53***	0.16**		
(adj p-value)	(0.0001)	(0.0152)		
#Illiq_Halts <i>(adj p-value)</i>			0.48*** (0.0001)	0.14** (0.0153)

VIX	0.06*** 0.06**			0.06***
(adj p-value)		(0.0003)	3) (0.0003)	
AdjR <sup>2</sup> (%)	35.28	74.08	35.92	74.66



### Regression of Daily SPY Jump Volatility on LULD Events in the Constituents of S&P500



#### Effect of Circuit Breakers on Market Quality

- Methodology: Regression Discontinuity Design (RDD)
- Threshold event: a security enters a limit or a straddle state
- Treatment: a security enters a trading halt

 $y_i = \beta + \alpha T_i + (X_i \gamma)' + \varepsilon_i$ 

- $y_i = \text{day } i \text{ market quality metric (illiquidity or price efficiency)}$ 
  - $y_i$  is a daily cross-sectional average
- $\alpha$  = the treatment effect

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- $T_i = 1$  if a halt follows a limit or straddle state;  $T_i = 0$  otherwise
- *X<sub>i</sub>* = Controls: AvgQVolat and AvgLogVol

#### Daily Number of Securities with Trading Halts





#### Illiquidity Proxies: Simple Averaged Effective Spread

 $ESpr_k = 2D_k(P_k - M_k) / M_k$  for trade k

- $D_k = +1$ , if trade k is a buy, and  $D_k = -1$ , if trade k is a sell
- $P_k$  = price,  $M_k$  = midquote; trade is a buy if P > M and a sell if P < M

$$AvgESpr_{j,i} = \frac{1}{N_{j,i}} \sum_{k=1}^{N_{j,i}} ESpr_k$$
 for stock *j* on day *i*;  $N_{j,i}$ =total # of trades

• The metric of interest is the XS average for day *i*:

$$y_i = AvgESpr_i = \frac{1}{N_i} \sum_{j=1}^{N_i} AvgESpr_{j,i}$$

- $N_i$ =total # of stocks that entered a limit or a straddle state on day *i*
- Note:  $ESpr_k = PI_k + RSpr_k$

#### Illiquidity Proxies: Simple Averaged Price Impact

 $PI_k = 2D_k(M_{k+5} - M_k) / M_k$  for trade k

•  $M_{k+5}$  = midpoint 5 min after the trade

$$AvgPI_{j,i} = \frac{1}{N_{j,i}} \sum_{k=1}^{N_{j,i}} PI_k$$
 for stock j on day i;  $N_{j,i}$ =total # of trades

• The metric of interest is the XS average for day *i*:

$$y_i = AvgPI_i = \frac{1}{N_i} \sum_{j=1}^{N_i} AvgPI_{j,i}$$

•  $N_i$ =total # of stocks that entered a limit or a straddle state on day *i* 



#### Illiquidity Proxies: Simple Averaged Realized Spread

$$RSpr_k = 2D_k(P_k - M_{k+5}) / M_k$$
 for trade k

•  $M_{k+5}$  = midpoint 5 min after the trade

$$AvgRSpr_{j,i} = \frac{1}{N_{j,i}} \sum_{k=1}^{N_{j,i}} RSpr_k$$
 for stock *j* on day *i*;  $N_{j,i}$ =total # of trades

• The metric of interest is the XS average for day *i*:

$$y_i = AvgRSpr_i = \frac{1}{N_i} \sum_{j=1}^{N_i} AvgRSpr_{j,i}$$

•  $N_i$ =total # of stocks that entered a limit or a straddle state on day *i* 

#### Circuit Breakers' Effects on Illiquidity

		Tier 1	
	AvgESpr	AvgPI	AvgRSpr
Halt	0.36***	0.11	0.16**
(adj p-value)	(0.0001)	(0.3022)	(0.0324)
AvgQVolat <i>(adj p-value)</i>	89.38*** (0.0001)	153.08*** <i>(0.0004)</i>	-47.16*** <i>(0.0002)</i>
AvgLogVol <i>(adj p-value)</i>	-0.11*** <i>(0.0001)</i>	-0.00 (0.9085)	-0.17*** <i>(0.0007)</i>
Ν	119	119	119



#### Circuit Breakers' Effects on Illiquidity

		Tier 1		Tier 2
	AvgESpr	AvgPl	AvgRSpr	AvgESpr AvgPI AvgRSp
Halt	0.36***	0.11	0.16**	2.26*** 1.26*** 0.95**
(adj p-value)	(0.0001)	(0.3022)	(0.0324)	(0.0001) (0.0001) (0.0004
AvgQVolat	89.38***	153.08***	-47.16***	-5.82 -2.30 -3.4
(adj p-value)	(0.0001)	(0.0004)	(0.0002)	(0.1713) (0.5251) (0.4566
AvgLogVol	-0.11***	-0.00	-0.17***	-0.48*** -0.35*** -0.1
(adj p-value)	(0.0001)	(0.9085)	(0.0007)	(0.0001) (0.0001) (0.4363
Ν	119	119	119	162 162 16

### Price Efficiency Proxies: Variance Ratios



- The metrics of interest are the XS averages for day *i* (*N<sub>i</sub>*=total # of stocks that entered a limit or a straddle state on day *i*)
- $y_i = AvgVR_{5,i} = \frac{1}{N_i} \sum_{j=1}^{N_i} VR_{5,j,i}$
- $y_i = AvgVR_{15,i} = \frac{1}{N_i} \sum_{j=1}^{N_i} VR_{15,j,i}$
- $y_i = AvgVR_{30,i} = \frac{1}{N_i} \sum_{j=1}^{N_i} VR_{30,j,i}$

#### Circuit Breakers' Effects on Price Discovery

		Tier 1		
	AvgVR <sub>5</sub>	AvgVR <sub>15</sub>	AvgVR <sub>30</sub>	
Halt	-0.01	0.05	-0.00	
(adj p-value)	(0.6858)	(0.1513)	(0.9649)	
AvgQVolat	9.42***	8.84**	-2.00	
(adj p-value)	(0.0002)	(0.0116)	(0.6707)	
AvgLogVol	-0.01	-0.00	0.01	
(adj p-value)	(0.2577)	(0.7523)	(0.3846)	
Ν	119	119	119	



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#### Circuit Breakers' Effects on Price Discovery

		Tier 1			Tier 2	
	AvgVR <sub>5</sub>	AvgVR <sub>15</sub>	AvgVR <sub>30</sub>	AvgVR <sub>5</sub>	AvgVR <sub>15</sub>	AvgVR <sub>30</sub>
Halt	-0.01	0.05	-0.00	0.07***	0.08***	0.06***
(adj p-value)	(0.6858)	(0.1513)	(0.9649)	(0.0001)	(0.0002)	(0.0002)
AvgQVolat	9.42***	8.84**	-2.00	-0.77***	-0.60**	-1.24***
(adj p-value)	(0.0002)	(0.0116)	(0.6707)	(0.0007)	(0.0157)	(0.0002)
AvgLogVol	-0.01	-0.00	0.01	-0.05***	-0.02***	0.02***
(adj p-value)	(0.2577)	(0.7523)	(0.3846)	(0.0001)	(0.0012)	(0.0069)
Ν	119	119	119	162	162	162

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#### Halts and Dark Trading Activity (Based on FINRA Data)



#### Trading Activity (Based on TAQ Data)

• Dark-to-Trade Ratio for stock *j* during day *i*:

 $Drk\_Trd_{j,i} = \frac{Drk\_trd}{(Drk_{trd} + NonDrk\_trd)}$ 

 $Drk_Trd = #$  of trades executed on dark pools

#### Trading Activity (Based on TAQ Data)

• Dark-to-Trade Ratio for stock *j* during day *i*:

 $Drk_Trd_{j,i} = \frac{Drk_trd}{(Drk_{trd} + NonDrk_trd)}$   $Drk_Trd = # of trades executed on dark pools$ 

• Intermarket Sweep Orders (ISOs) for stock *j* during day *i*:

 $ISO\_Trd_{j,i} = \frac{ISO\_trd}{(ISO\_trd + NonISO\_trd)}$   $ISO\_Trd = # of ISO trades$ 

- Use the above RDD methodology for the two trading strategies
- Metric of interest is the day *i* XS average:  $y_i = AvgDrk_Trd$  and  $y_i = AvgISO_Trd$
- Additional control: Avg|Ord\_Imb| = |Buys-Sells|/(Buys +Sells)

#### Circuit Breakers' Effects on Trading Activity

	AvgDr	k_Trd
-	Tier 1	Tier 2
- Halt	4.30*	-0.71
(adj p-value)	(0.0580)	(0.4736)
AvgQVolat	-2.76	-0.78***
(adj p-value)	(0.2389)	(0.0020)
AvgLogVol	1.38*	2.93***
(adj p-value)	(0.0543)	(0.0010)
Avg Ord_Imb	42.39*	8.99
(adj p-value)	(0.0543)	(0.4736)
Ν	119	162



#### Circuit Breakers' Effects on Trading Activity

	AvgDrk_T	rd	AvgISO_T	rd
	Tier 1	Tier 2	Tier 1	Tier 2
Halt	4.30*	-0.71	-3.12**	2.07**
(adj p-value)	(0.0580)	(0.4736)	(0.0148)	(0.0213)
AvgQVolat	-2.76	-0.78***	5.27***	-0.28
(adj p-value)	(0.2389)	(0.0020)	(0.0008)	(0.1962)
AvgLogVol	1.38*	2.93***	1.47***	-0.42
(adj p-value)	(0.0543)	(0.0010)	(0.0005)	(0.4764)
Avg Ord_Imb	42.39*	8.99	10.91	-11.51
(adj p-value)	(0.0543)	(0.4736)	(0.3209)	(0.2054)
Ν	119	162	119	162

#### Robustness Checks ("Treated": Only Securities with Illiquid Halts)

		Tier 1			Tier 2	
	AvgESpr	AvgPl	AvgRSpr	AvgESpr	AvgPl	AvgRSpr
Halt	0.27***	0.13	0.13**	2.54***	0.91***	1.67***
(adj p-value)	(0.0001)	(0.3022)	(0.0324)	(0.0001)	(0.0004)	(0.0001)

N for Tier1	112
N for Tier2	160



#### Robustness Checks ("Treated": Only Securities with Illiquid Halts)

		Tior 1		Tier 2
	AvgESpr	AvgPI	AvgRSpr	AvgESpr AvgPI AvgRSpr
Halt	0.27***	0.13	0.13**	2.54*** 0.91*** 1.67***
(adj p-value)	(0.0001)	(0.3022)	(0.0324)	(0.0001) (0.0004) (0.0001)
		Tier 1		Tier 2
	AvgVR5	AvgVR15	AvgVR30	AvgVR5 AvgVR15 AvgVR30
Halt	0.02	0.10***	0.02	0.07*** 0.09*** 0.05***
(adj p-value)	(0.3045)	(0.0008)	(0.4829)	(0.0001) (0.0001) (0.0055)

N for Tier1	112
N for Tier2	160



#### Robustness Checks ("Treated": Only Securities with Illiquid Halts)

		Tier 1				Tier 2			
	AvgESpr	AvgPI	AvgRSpr	AvgE	Spr	AvgPI	AvgRSpr		
Halt	0.27***	0.13	0.13**	2.5	4***	0.91***	1.67***		
(adj p-value)	(0.0001)	(0.3022)	(0.0324)	(0.00	001)	(0.0004)	(0.0001)		
		Tier 1				Tier 2			
	AvgVR5	AvgVR15	AvgVR30	Avg	VR5	AvgVR15	AvgVR30		
Halt	0.02	0.10***	0.02	0.0	)7***	0.09***	0.05***		
(adj p-value)	(0.3045)	(0.0008)	(0.4829)	(0.0	001)	(0.0001)	(0.0055)		
	AvgD	ork_Trd		A	vgISO	_Trd	-		
	Tier 1	٢	ier 2	Ti	er 1	Tier 2	-		
Halt	6.52**	] .	-0.68	-2.	65**	2.31**	N for	Tier1	1
(adj p-value)	(0.0193)	(0.7	7960)	(0.03	542)	(0.0226)	N for	Tier2	1

#### Conclusions

- Circuit breakers have prevented market crashes from occurring during the pandemic
- While designed to accommodate news shocks, most of the trading halts turn out to be illiquidity events
- Illiquidity-driven halts in (some of) the S&P500 constituents are associated with jumps in SPY
- Halts are followed by subsequent lower liquidity in all securities, and by worse price discovery in smaller securities
- Channels for liquidity depletion: increased dark trading in large stocks, and increased use of ISO-designated orders in small stocks, which indicates market fragmentation

#### Recommendations

- Redesign the price bands parameters based on securities' volatilities
- Design a longer duration limit state for Tier 2 securities to avoid halts
- Revisit the recent removal of double price bands at the open
- Regulators need to keep a close watch on the levels of dark trading and on ISO usage during times of market stress
- There is need for a better coordination between the spot and the derivatives markets