

## Liquid Insight

## Focus on repo and leverage at Fed today

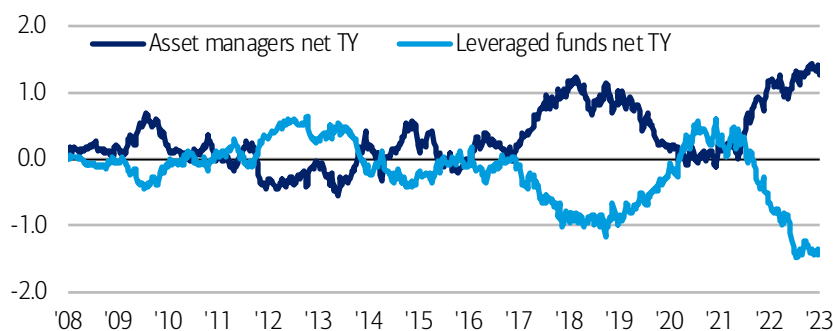
## Key takeaways

- Today's Treasury conference could indicate near term priorities for regs. We do not expect a final SEC repo clearing rule.
- Regulators are choosing a higher cost to trade today in exchange for better market resilience in stress periods of tomorrow.
- Market impacts may include tighter swap spreads, larger relative value dislocations, lower liquidity, & wider bid/offers.

## By Ralph Axel &amp; Mark Cabana

**Chart of the day: Futures use is heavy for both asset managers and hedge funds**

Reduced leverage and basis likely means a system-wide reduction in futures usage



Source: BofA Global Research, CFTC. Note: chart shows millions of TY futures net position by investor type

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## Treasury market structure in focus today

The Fed is hosting today its annual Treasury market structure conference. Speakers include officials from Fed, Treasury, SEC, CFTC and traders / risk managers with emphasis on repo and sovereign bond markets. The rates market is looking for any signal of additional UST market structure or bank regulatory changes to support Treasury market resilience & banking system stability. Key issues in the Treasury market: (1) leverage use & concentration, especially for hedge funds; (2) structure of repo financing. Efforts also underway to improve banking system stability via higher bank capital levels, bank liquidity metrics, and funding sources like FHLB (the Federal Home Loan Banks).

A key focus is the SEC proposal to mandate clearing for repo markets. We do not expect a final rule on that this week, though there will be much discussion on it today. The official sector may also work to link recent ICBC cyber-attack & subsequent UST settlement challenges to the need for UST central clearing. We think the SEC repo clearing rule is still a work in progress. We expect a final rule in 1H '24, possibly in 1Q '24. Central clearing is coming and it will cheapen USTs vs swaps when it arrives. We expect implementation later in '24 or potentially '25.

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Rates and Currencies Research  
Global

Global Rates & Currencies Research  
MLI (UK)

**Ralph Axel**  
Rates Strategist  
BofAS  
+1 646 855 6226  
ralph.axel@bofa.com

**Mark Cabana, CFA**  
Rates Strategist  
BofAS  
+1 646 855 9591  
mark.cabana@bofa.com

**Adarsh Sinha**  
FX Strategist  
Merrill Lynch (Hong Kong)  
+852 3508 7155  
adarsh.sinha@bofa.com

**Janice Xue**  
Emerging Asia FI/FX Strategist  
Merrill Lynch (Hong Kong)  
+852 3508 8587  
janice.xue@bofa.com

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## Liquid Insight

## Recent Publications

- 15-Nov-23 [Q&A on NISA and Japan's retail rebalancing](#)
- 14-Nov-23 [USD: Anatomy of a selloff – positioning vs. rate differentials](#)
- 13-Nov-23 [Signs of demand in EUR primary markets](#)
- 9-Nov-23 [GBP: Back to Basics](#)
- 8-Nov-23 [US vol – lower...but curb your enthusiasm](#)
- 7-Nov-23 [Losing our liquidity](#)
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- 1-Nov-23 [Bank of England preview: extended hold](#)
- 31-Oct-23 [Nov FOMC preview: spooked by real rates](#)

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SEC: US Securities and Exchange Commission

CFTC: Commodity Futures Trading Commission

ICBC: Industrial and Commercial Bank of China

## What it all means for markets

With so many regulatory threads up in the air, it is hard to predict the sequencing over the next year. In general, we think leverage usage is near the top of list of priorities because the Financial Stability Oversight Council (FSOC) has flagged leverage usage as a potential source of systemic risk, which likely means that FSOC could prioritize efforts to monitor leverage usage and potentially restrict it. In our view, it seems probable that FSOC can move forward with very specific tweaks that do not require large infrastructure changes like the SEC's repo clearing proposal. While we expect repo markets to continue transitioning to a cleared market and we do expect the SEC to eventually finalize a mandated clearing rule for repo, the FSOC could potentially fast track their focus on leverage with changes to reporting requirements and mandated minimum repo haircuts.

Reporting and transparency within Treasuries, repo and futures basis seems surprisingly lacking based upon two Fed research reports over the summer which relied on very approximate ballpark methodologies to attempt to estimate the extent of cash-futures basis trades in the market. If reporting ramps up quickly, FSOC members such as Fed and CFTC could potentially consider limits or restrictions based on underlying metrics of the individual trading firms.

Increased minimum haircuts could be used to essentially increase the price of leverage, and increase the percentage of capital required for typical relative value trades like futures basis, swap spreads, curve and butterfly trades, off-the-run vs on-the-run spreads, etc. As the Fed wrote back in September, this could result in larger relative value dislocations across these markets, to incentivise putting the trades on at the higher capital costs.

We believe that although a primary goal for market structure reforms is to improve the liquidity and transparency of Treasury markets, daily liquidity might decline because of these wider dislocations which could translate into overall wider bid-offer spreads in typical daily trades. If a dealer uses futures to hedge a cash trade, that is similar to a basis and so if that dealer has lower confidence that the basis will have low volatility, that expected hedge slippage could result in wider overall costs of trading through wider-bid offers or lower depths of market in order books.

Asset managers are equally large users of futures as hedge funds, they just trade it from the long side. We expect asset managers to experience higher costs to trade which could result in lower overall futures open interest. While this is not necessarily a bad outcome, it would be reasonable to expect that lower total market size could result in a lower liquidity futures market. This then feeds back into traders like dealers who use futures to hedge daily flows and then become incentive to pass costs on via wider markets.

Leverage is typically employed in duration-neutral trades so we do not expect this to noticeably impact interest rate levels. If hedge funds were mostly directional investors and were often going in the same direction all at once, then we would expect to see a directional impact on rates, but that does not appear to be the case today.

## Bank liquidity funding and capital

After the March 2023 liquidity crunch, regulators are highly focused on implementing the Basel 3 "endgame" requirements which is still in a proposal phase and include changes to formulas used to calculate risk-weighted capital exposures, higher capital rules for large and small banks, and changes to the Global Systemically Important Bank (GSIB) capital surcharge calculation to make it daily metric rather than end-of-year snapshot. These changes we think will on the margin cheapen Treasuries to swaps and potentially again increase the frictions/costs in trading relative value opportunities, which would translate into lower overall liquidity and higher costs of trading and dealer warehousing of securities. We find that dealer holdings of Treasuries has a relatively strong correlation to swap spreads, where Treasuries cheapen vs swaps when dealers need to hold more Treasuries.

Recently, the regulator of the FHLB system proposed a set of rule changes to potentially limit the usage of FHLB as a funding source for banks. FHLB usage was relatively heavy even before March 2023 as banks relied on FHLB to replace deposits that have been shifting around the system as consumers shop around for the best deposit rates. The Fed also submitted a supervisory letter to banks in October telling banks to make sure they understand the Fed's discount window and are prepared to tap it if they need funding. While it is too early to know whether the FHLB changes will be fully adopted and over what time frames, we think the direction of travel on this front is lower access to private funding options for banks in general and an emphasis on using the Fed window for acute stress periods, where FHLB has traditionally played an important role. On the margin, any restriction in bank funding we think creates conditions for more restrictive lending conditions. This in turn could marginally limit lending in markets like repo and a more defensive stance for non-market lending. At the margin, this is not likely a positive for overall liquidity or funding access.

New liquidity rules (Liquidity Coverage Ratio [LCR] and High-Quality Liquid Assets [HQLA]) have not been proposed to our knowledge. We think this could come to the forefront in 2024, and might also be discussed at the conference today. If more banks are required to meet LCR standards (liquidity coverage ratio) it could increase demand for high quality liquid assets (HQLA) and we think that Treasuries might become even more beneficial versus mortgages for this purpose, but that is still highly speculative at this stage. If so, we think swap spreads in the front-end could benefit like we saw in 2014 when the LCR rules were originally adopted.

While there are negatives involved, we think there may be some positives as well. But the positives appear to be more of the insurance type, where the tail events such as March 2023 and Sep 2008 can be mitigated by lower leverage concentration and better access to Fed liquidity sources, and a larger overall capital buffer in place system wide. Whether the daily cost is worth the benefit of future insurance, only time will. Today's Treasury market conference will hopefully shed some light on what is more likely to happen, the timeframes to expect, and perhaps some other options that have yet to be explored. Along these lines, some officials have discussed the idea of allowing the Fed to play a larger role in market liquidity and functioning like they did in 2020. This is something we expect to hear more of in the future.

### **Conclusion for market impact**

Regulatory reform is a slowly moving set of complex developments with potentially offsetting market impacts in various areas. The main takeaway for us is that regulators may essentially seek a higher cost and lower liquidity for "peacetime" markets for the reward of greater resilience and system-wide stability in acute stress periods. This means larger relative value opportunities like spreads, basis, curve and butterflies, with potentially wider bid/offer spreads in the markets. Minimum UST repo haircuts could be a swap spread tightener particularly in the 2y sector where relative value trading is more prevalent. 2y Treasuries are historically cheap versus swaps and the incentive to take the other side of that we think will need to be larger if minimum haircuts rise.

## Notable Rates and FX Research

- **Global Rates, FX & EM Year Ahead 2023** – [Year Ahead 2023: Pivot ≠ Peak](#), 20 Nov 2022
- [Turning point](#), **Global FX Weekly**, 10 Nov 2023
- [Bond fairy tails](#), **Global Rates Weekly**, 10 Nov 2023
- [USD sell-off can extend](#), **Liquid Cross Border Flows**, 6 Nov 2023

## Rates, FX & EM trades for 2023

For a complete list of our open trade recommendations, as well as our trade recommendations closed over the past 12 months, see the reports below:

[Global FX weekly: Turning point 10 November 2023](#)

[Global Rates Weekly: Bond fairy tails 10 November 2023](#)

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# Research Analysts

## US

### Ralph Axel

Rates Strategist  
BofAS  
+1 646 855 6226  
[ralph.axel@bofa.com](mailto:ralph.axel@bofa.com)

### Paul Ciana, CMT

Technical Strategist  
BofAS  
+1 646 855 6007  
[paul.ciana@bofa.com](mailto:paul.ciana@bofa.com)

### John Shin

FX Strategist  
BofAS  
+1 646 855 9342  
[joong.s.shin@bofa.com](mailto:joong.s.shin@bofa.com)

### Vadim Iaralov

FX Strategist  
BofAS  
+1 646 855 8732  
[vadim.iaralov@bofa.com](mailto:vadim.iaralov@bofa.com)

### Mark Cabana, CFA

Rates Strategist  
BofAS  
+1 646 855 9591  
[mark.cabana@bofa.com](mailto:mark.cabana@bofa.com)

### Bruno Braizinha, CFA

Rates Strategist  
BofAS  
+1 646 855 8949  
[bruno.braizinha@bofa.com](mailto:bruno.braizinha@bofa.com)

### Meghan Swiber, CFA

Rates Strategist  
BofAS  
+1 646 855 9877  
[meghan.swiber@bofa.com](mailto:meghan.swiber@bofa.com)

## Europe

### Ralf Preusser, CFA

Rates Strategist  
MLI (UK)  
+44 20 7995 7331  
[ralf.preusser@bofa.com](mailto:ralf.preusser@bofa.com)

### Ruben Segura-Cayuela

Europe Economist  
BoFA Europe (Madrid)  
+34 91 514 3053  
[ruben.segura-cayuela@bofa.com](mailto:ruben.segura-cayuela@bofa.com)

### Mark Capleton

Rates Strategist  
MLI (UK)  
+44 20 7995 6118  
[mark.capleton@bofa.com](mailto:mark.capleton@bofa.com)

### Athanasios Vamvakidis

FX Strategist  
MLI (UK)  
+44 020 7995 0279  
[athanasios.vamvakidis@bofa.com](mailto:athanasios.vamvakidis@bofa.com)

### Sphia Salim

Rates Strategist  
MLI (UK)  
+44 20 7996 2227  
[sphia.salim@bofa.com](mailto:sphia.salim@bofa.com)

### Kamal Sharma

FX Strategist  
MLI (UK)  
+44 20 7996 4855  
[ksharma32@bofa.com](mailto:ksharma32@bofa.com)

### Ronald Man

Rates Strategist  
MLI (UK)  
+44 20 7995 1143  
[ronald.man@bofa.com](mailto:ronald.man@bofa.com)

### Michalis Rousakis

FX Strategist  
MLI (UK)  
+44 20 7995 0336  
[michalis.rousakis@bofa.com](mailto:michalis.rousakis@bofa.com)

## Pac Rim

### Adarsh Sinha

FX Strategist  
Merrill Lynch (Hong Kong)  
+852 3508 7155  
[adarsh.sinha@bofa.com](mailto:adarsh.sinha@bofa.com)

### Janice Xue

Rates Strategist  
Merrill Lynch (Hong Kong)  
+852 3508 8587  
[janice.xue@bofa.com](mailto:janice.xue@bofa.com)

### Shusuke Yamada, CFA

FX/Rates Strategist  
BofAS Japan  
+81 3 6225 8515  
[shusuke.yamada@bofa.com](mailto:shusuke.yamada@bofa.com)

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