How Does Payment for Order Flow Influence Markets? Evidence from Robinhood Crypto Token Introductions

Tom Boulton (Miami University)
Tom Shohfi
Michael Walz (U.S. Securities and Exchange Commission)

WBS Gilmore Centre Academic Conference DeFi & Digital Currencies Saturday, September 28th, 2024



Disclaimer

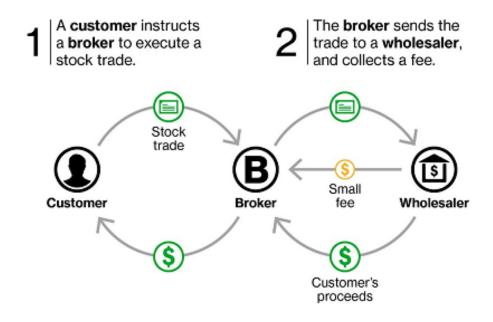
The U.S. Securities and Exchange Commission disclaims responsibility for any private publication or statement of any SEC employee or Commissioner. This presentation expresses the authors' views and does not necessarily reflect those of the Commission, the Commissioners, or other members of the staff. This paper is part of the Division of Economic and Risk Analysis' Working Paper Series. Papers in this series are the work of the authors and not the work of the Division or the Commission. Inclusion of a paper in this series does not indicate a Division or Commission determination to take any particular action or position. References to this paper should indicate that the paper is a "DERA Working Paper."



Payment for Order Flow (PFOF)

How Payment for Order Flow Works

Retail brokers typically don't execute their customers' orders. Instead they pass the trades to wholesalers like Citadel Securities or KCG that pay them a fee.



The **wholesaler** is required to find the "best execution," which could mean the lowest price, the speediest trade or the one most likely to be completed. The wholesaler returns the proceeds to the **broker**, who credits it to the **customer**.



Source: Medium.com

PFOF: Is it Good or Bad for Markets?

- Australia, Canada, Singapore, and the United Kingdom Have Banned PFOF
- EU Set to Ban PFOF by 2026
- SEC's Gensler: PFOF is a Conflict of Interest

- Equities Trading Costs are Lower than Ever!
- Trading Commissions Might Return if Brokers are not able to Monetize Customer Order Flow
- Broker-Dealers have Efficiently Outsourced Order Execution Functions



PFOF in the Literature

- Hu and Murphy (2024): More Internalization by Broker-Dealers is Associated with Higher Spreads and Worse Price Improvement in Equities Markets
- Ernst and Spatt (2022): Broker-Dealers have Incentives to Push Customers into Asset Classes with Higher PFOF, Particularly Options over Equities
- Levy (2022): PFOF is Generally Associated with Price Improvement, but Varies by Broker-Dealer



Figure 1 – Crypto Asset Trading Volume

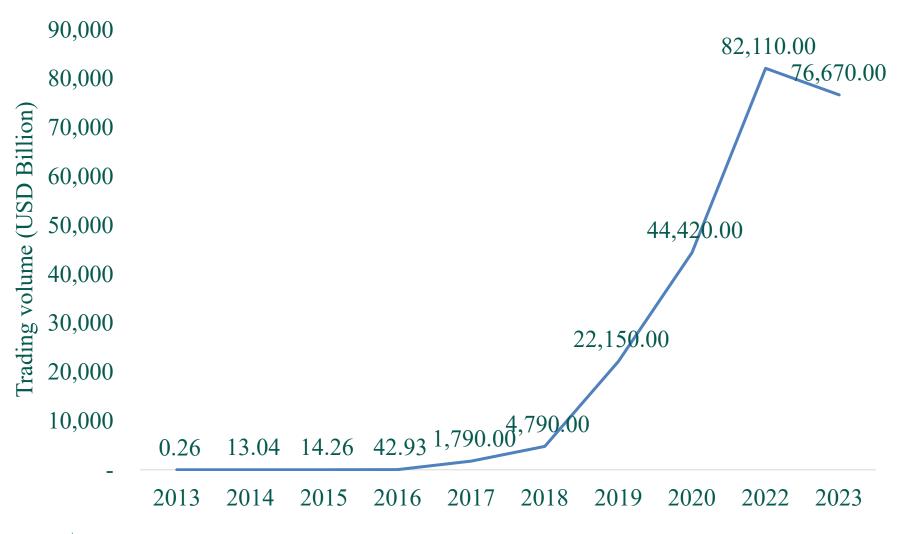
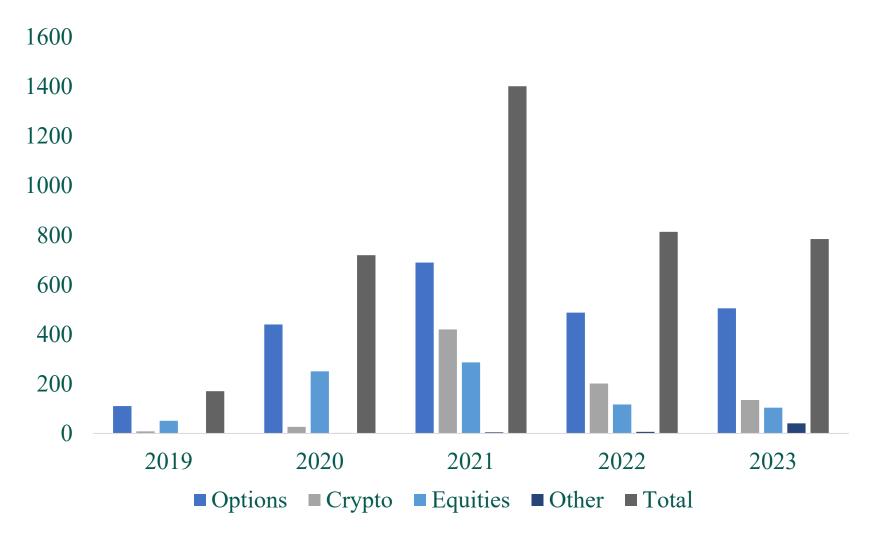




Figure 2 – Robinhood PFOF Revenue





PFOF Rates / Non-Compliance

- Robinhood's PFOF Revenue as % of Order Value
- Equity: 0.8 bps
- Options: 8 bps
- Crypto: 35 bps (From Robinhood Earnings Call)

	Three Months Ended September 30,		Nine Months Ended September 30,				
(in millions)		2021	2022		2021		2022
Transaction-based revenues:							
Options	\$	164	\$ 124	\$	527	\$	364
Cryptocurrencies		51	51		372		163
Equities		50	31		235		96
Other		2	2		4		5
Total transaction-based revenues		267	208		1,138		628

Source: Robinhood 10-Q

- No 606 Reports for Non-Compliant Crypto Space
- Wholesaler Trades are Not Made Public



Table 1 – Robinhood Crypto Introductions

	Kaiko		
Name	Symbol	Listing Date	Information URL
Aave	aave	10/24/2022	https://twitter.com/robinhoodapp/status/1584532320551174145
Avalanche	avax	8/8/2022	https://twitter.com/robinhoodapp/status/1556624446093373440
Bitcoin	btc	1/25/2018	https://twitter.com/RobinhoodApp/status/956557558017179648
Bitcoin Cash	bch	7/12/2018	https://blog.robinhood.com/news/2018/7/12/litecoin-and-bitcoin-cash-now-on-robinhood-crypto
Bitcoin SV	bsv	11/29/2018	https://twitter.com/askrobinhood/status/1068346552341561344?lang=en
Cardano	ada	9/1/2022	https://twitter.com/RobinhoodApp/status/1565323169409351681
Chainlink	link	6/28/2022	https://twitter.com/RobinhoodApp/status/1541765004885577730
Compound	comp	4/12/2022	https://blog.robinhood.com/news/2022/4/12/robinhood-lists-four-new-crypto-assets
Dogecoin	doge	7/16/2018	https://blog.robinhood.com/news/2018/7/15/dogecoin-is-now-on-robinhood-crypto
Ethereum	eth	1/25/2018	https://twitter.com/RobinhoodApp/status/956557558017179648
Ethereum Classic	etc	8/6/2018	https://blog.robinhood.com/news/2018/8/5/ethereum-classic-is-now-on-robinhood-crypto
Litecoin	ltc	7/12/2018	https://blog.robinhood.com/news/2018/7/12/litecoin-and-bitcoin-cash-now-on-robinhood-crypto
Polygon	matic	4/12/2022	https://blog.robinhood.com/news/2022/4/12/robinhood-lists-four-new-crypto-assets
Shiba Inu	shib	4/12/2022	https://blog.robinhood.com/news/2022/4/12/robinhood-lists-four-new-crypto-assets
Solana	sol	4/12/2022	https://blog.robinhood.com/news/2022/4/12/robinhood-lists-four-new-crypto-assets
Stellar Lumens	xlm	8/8/2022	https://twitter.com/robinhoodapp/status/1556624446093373440
Tezos	xtz	10/24/2022	https://twitter.com/robinhoodapp/status/1584532320551174145
Uniswap	uni	7/14/2022	https://twitter.com/RobinhoodApp/status/1547608038860697606
USD Coin	usdc	9/20/2022	https://twitter.com/RobinhoodApp/status/1572215405791580164



Table 2 – Crypto Asset Summary Stats

		Market	Daily Dollar	Daily	Active Trading
Name	Unit Price	Capitalization	Volume	Trades	Platforms
Aave	\$75.740	\$1,105,053,320	\$30,352,776	213,449	29
Avalanche	\$21.296	\$7,563,894,885	\$152,979,480	526,477	22
Bitcoin	\$10,252.060	\$200,174,661,561	\$974,400,000	1,001,481	25
Bitcoin Cash	\$828.961	\$16,198,567,369	\$70,454,280	126,008	14
Bitcoin SV	\$79.530	\$1,532,259,166	\$2,522,275	11,507	7
Cardano	\$0.450	\$15,856,258,810	\$199,666,920	670,354	22
Chainlink	\$8.685	\$4,835,374,220	\$113,497,728	435,061	35
Compound	\$103.262	\$816,884,230	\$23,386,457	150,343	29
Dogecoin	\$0.004	\$571,843,952	\$419,848	8,701	4
Ethereum	\$667.741	\$80,300,992,176	\$307,200,000	612,983	22
Ethereum Classic	\$13.929	\$2,001,573,042	\$49,179,888	117,786	12
Litecoin	\$92.817	\$6,849,506,322	\$58,716,768	165,426	18
Polygon	\$1.218	\$11,335,066,980	\$259,200,000	846,788	30
Shiba Inu	\$0.00002	\$11,740,334,448	\$1,123,200,000	1,110,413	25
Solana	\$81.064	\$33,869,298,882	\$640,800,000	1,651,827	18
Stellar Lumens	\$0.116	\$3,236,822,298	\$31,923,696	244,432	23
Tezos	\$1.288	\$1,233,238,799	\$8,163,278	84,563	20
Uniswap	\$6.499	\$3,825,061,652	\$48,716,184	327,057	35
USD Coin	\$1.000	\$43,537,884,267	\$379,200,000	250,093	28



Table 3 – Crypto-Hour Summary Stats

	(1)	(2)	(3)	(4)	(5)
Variables	Mean	Std. Dev.	Median	Min	Max
log(Dollar Volume)	14.408	2.218	14.663	6.337	18.207
Order Imbalance	0.052	0.300	0.006	-0.650	1.000
log(Trade Size)	6.015	1.135	6.130	2.051	8.263
C-S Spread	0.020	0.048	0.006	0.000	0.314
Volatility	0.003	0.007	0.001	0.000	0.048

- H1a: More Wholesaler Activity Off Trading Platforms
 - Dark Uninformed Trading (or Trading On-Chain)
 - Lower Dollar Volume, Lower Order Imbalance, Higher Trade Size, Higher C-S Spread, Higher Volatility
- H1b: More Wholesaler Activity On Trading Platforms
 - Wholesalers Conduct Offsetting Trades on Trading Platforms
 - Higher Dollar Volume, Higher Order Imbalance, Smaller Trade Size, Lower C-S Spread, Lower Volatility
- 3 Specs: All, USD Countercurrency Only, BTC/ETH Only



Table 4 – Volume

	(1)	(2)	(3)
	log(Dollar	log(Dollar	log(Dollar
Variables	Volume)	Volume)	Volume)
PFOF Introduction	-0.057***	-0.152***	0.069***
	(-16.916)	(-34.229)	(5.329)
log(Dollar Volume) _{t-1}	0.777***	0.682***	0.872***
	(192.296)	(117.279)	(111.283)
Subsample	Full	USD Only	BTC/ETH Only
Hour of Day FE	Yes	Yes	Yes
Token FE	Yes	Yes	Yes
Countercurrency FE	Yes	No	Yes
N	240,532	80,262	25,920
R^2	0.933	0.939	0.861



Table 5 – Order Imbalance

	(1)	(2)	(3)
Variables	Order Imbalance	Order Imbalance	Order Imbalance
PFOF Introduction	0.001	-0.008***	-0.010***
	(0.942)	(-5.705)	(-3.695)
Order Imbalance _{t-1}	0.464***	0.112***	0.267***
	(110.881)	(18.312)	(22.473)
Subsample	Full	USD Only	BTC/ETH Only
Hour of Day FE	Yes	Yes	Yes
Token FE	Yes	Yes	Yes
Countercurrency FE	Yes	No	Yes
N	240,478	80,244	25,914
R^2	0.452	0.473	0.077



Table 6 – Trade Size

	(1)	(2)	(3)
Variables	log(Trade Size)	log(Trade Size)	log(Trade Size)
PFOF Introduction	0.006	0.032***	-0.005
	(1.481)	(7.009)	(-0.400)
log(Trade Size) _{t-1}	1.031***	1.100***	1.024***
	(293.583)	(176.832)	(184.703)
Subsample	Full	USD Only	BTC/ETH Only
Hour of Day FE	Yes	Yes	Yes
Token FE	Yes	Yes	Yes
Counter crypto asset FE	Yes	No	Yes
N	240,478	80,244	25,914
R^2	0.862	0.888	0.795



Table 7 – Implied Spread (Corwin-Schultz)

	(1)	(2)	(3)
Variables	C-S Spread	C-S Spread	C-S Spread
PFOF Introduction	0.001***	0.002***	0.000
	(7.966)	(12.024)	(0.176)
C - S $Spread_{t-1}$	0.899***	0.935***	0.780***
	(190.057)	(345.869)	(90.186)
Subsample	Full	USD Only	BTC/ETH Only
Hour of Day FE	Yes	Yes	Yes
Token FE	Yes	Yes	Yes
Countercurrency FE	Yes	No	Yes
N	240,397	80,225	25,896
R^2	0.842	0.944	0.609



Table 8 - Volatility

	(1)	(2)	(3)
Variables	Volatility	Volatility	Volatility
PFOF Introduction	0.012***	0.023***	-0.003
	(6.620)	(7.837)	(-0.851)
$Volatility_{t-1}$	0.888***	0.886***	0.970***
	(189.572)	(155.673)	(234.715)
Subsample	Full	USD Only	BTC/ETH Only
Hour of Day FE	Yes	Yes	Yes
Token FE	Yes	Yes	Yes
Countercurrency FE	Yes	No	Yes
N	240,452	80,234	25,914
R^2	0.836	0.903	0.942



Conclusion

- First Paper to Examine PFOF in Crypto Markets
- PFOF Rates in Crypto Markets are Relatively Large, Reflect Highly Uninformed Trading
 - 35 bps Compared to 8 (0.8) bps for Options (Equities)
- Introduction of PFOF Crypto Markets Leads to:
 - Lower Volume on Trading Platforms
 - Net Sale Order Imbalances, Higher Average Trade Size
 - Higher Implied Spreads (Approx. \$4.8M in Daily Costs)
 - Greater Return Volatility
- BTC/ETH Largely Unaffected





MIKE LITCH SCHOOL OF BUSINESS