The Hidden Cost of 'Zero Commission'





Making your first Zero Commission trade on Webull.



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The New York Times

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Yes, You Can Get Free Trading. But There's Often a Catch.

A price war has driven the cost of some stock trades to zero. But brokerages have to make money somehow, and here are some of the ways.

Introduction

The Model

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A New Age of Trading



Figure 1. Five of the world's leading stock exchanges.

Figure 2. Five of the world's leading online trading platforms. In 2023, the market was valued at \$10.98 billion with CAGR of 6.7%.

Competing Business Models

Transparent Transaction Costs

Fransactions in stocks with a per share stock price of \$1.00 or more	
Non-Tier Adding Credit – Equity per Share Credit - per transaction - for all orders, other than Mid-Point Liquidity ("MPL") and Non-Displayed Limit Orders that add liquidity to the NYSE unless a higher credit applies	\$0.0012
Adding Credit for Non-Displayed Limit Orders when adding liquidity to the NYSE unless a higher credit applies.	No credit
Non Display Tier 2 If the member organization has Adding ADV in Non-Displayed Limit Orders that is at least 0.12% of Tapes A, B and C CADV combined, excluding any liquidity added by a DMM.	\$0.0010 0.10% of the total dollar value of the transaction for securities with a per share stock price below \$1.00
Non Display Tier 1 If the member organization has Adding ADV in Non-Displayed Limit Orders that is at least 0.15% of Tapes A, B and C CADV combined, excluding any liquidity added by a DMM.	\$0.0018 0.18% of the total dollar value of the transaction for securities with a per share stock price below \$1.00
	\$0.0005 if an increase of at least 0.02% and less than 0.04%
If the member organization has Adding ADV in Non-Displayed Limit Orders and MPL Orders in Tapes A, B and C CADV combined, excluding any liquidity added by a DMM, that is at least 0.02% of NYSE CADV over that member organization's May 2020 adding liquidity in Non-Displayed Limit Orders and MPL Orders taken as a percentage of NYSE CADV.	\$0.0010 if an increase of at least 0.04% and less than 0.08% \$0.0015 if an increase of at least 0.08% or more

Figure 3. An excerpt of the NYSE's extensive regulation of transaction costs.

Zero-Commission Model





Figure 4. Online trading platforms promote trading without transaction costs to reduce traders' costs.

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The Truth behind 'Zero-Commission'

Payment for Orderflow



Figure 5. Customer = retail trader, broker = online trading platform, and market maker = financial institution that buys/sells financial assets.

- Robinhood: \sim 70% of revenue is generated by PFOF.
- Citadel Securities: \$2.6 billion per year spent on PFOF.

A Divisive Debate

The New York Times

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Reuters

EU agrees deal on securities rules that includes ban on broker commission



The European Union said on Thursday that member states and the European Parliament have reached a deal on updating the bloc's "MIFID"...

29.06.2023

FT Financial Times

SEC aims to stem trading practice of 'payment for order flow' Now, the SEC's gaze has fallen on payment for order flow, or PFOF. Popularised by the disgraced investor Bernard Madoff, the practice has become... 7 Jun 2022 US BECURTIES AND EXCHANCE Excess

Figure 6. Zero-commission models & PFOF have received significant

regulatory attention: Conflicts of best price execution & transparency.

Zero-commission \leftrightarrow Hidden transaction costs

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The Traders

Traders. Unit mass of buyers \mathcal{B} & sellers \mathcal{S} with distribution μ_B & μ_S

• Today: Unit demand & supply ↔ Densities = 1

Limit orders. Trader i submits value $v_i \in [1,2]$

• Buyer (seller): Max. (min.) price, at which they are willing to trade

Demand & supply. Aggregation of limit orders

- $D(P) = \mu_B \{ b \in \mathcal{B} : v_b \ge P \} \& S(P) = \mu_S \{ s \in \mathcal{S} : v_s \le P \}$
- Assumptions: Strictly monotone \mathcal{C}^1 functions

Market-clearing price. P_{eq} with $D(P_{eq}) = S(P_{eq})$



Figure 7. Baseline market with linear demand & supply over the interval [1,2], that is, D(P) = 2 - P & S(P) = P - 1. The market-clearing price is $P_{eq} = 1.5$.

The Market Platform

- Observes demand & supply (orderbook)
- Sets a buy price P_b & a sell price P_s \rightarrow Bid-ask spread $\sigma = P_b - P_s$
- Executes buy orders $\mathcal{B}^* \subseteq \mathcal{B}$ & sell orders $S^* \subseteq S$ $\rightarrow \mu_B(\mathcal{B}^*) = \mu_S(S^*) = Q$ (Trade balance)
- Active buyers pay P_b & active sellers receive P_s
- Platform revenue: $R(\sigma) = (P_b P_s) \cdot Q$
- Gains of Trade: $GoT = \int_{\mathcal{B}^*} v_b \mu_B(b) \int_{\mathcal{S}^*} v_s \mu_S(s)$
- **Efficiency**: $Eff = \frac{GoT}{GoT^{max}}$



Figure 8. Baseline market with linear demand & supply over the interval [1,2], that is, D(P) = 2 - P & S(P) = P - 1. The market-clearing price is $P_{eq} = 1.5$.

The Market Dynamics

Arrival. New traders arrive at times t = 1, 2, ...

• Constant incoming value distributions: $D^{0}(P) \& S^{0}(P)$

Market Clearing. At time step *t*, the platform

• sets buy & sell price + executes some orders

Departure. Unexecuted orders stay with prob. $\varepsilon \in (0,1)$.

- $Z_D^t(P) \& Z_S^t(P)$: Excess demand & supply at time t.
- $D^{t+1}(P) = D^{0}(P) + \varepsilon \cdot Z_{D}^{t}(P) \& S^{t+1}(P) = S^{0}(P) + \varepsilon \cdot Z_{S}^{t}(P)$

Platforms Objective. Revenue maximization

• per round (today) or in the long-run (in general)

Long-run Efficiency. $Eff^{\infty} = \lim_{t \to \infty} \frac{\sum_{t=1}^{\infty} GoT^{t}}{t \cdot GoT^{max}}$









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Two Classes of Transaction Costs

Transparent Transaction Costs

Buy & sell prices. Functions of *P*_{eq} (<u>ex-ante</u>)

- $P_b = F_b(P_{eq}) \ge P_{eq} \& P_s = F_s(P_{eq}) \le P_{eq}$
- Constant TCs: $F_b(P) = P + c \& F_s(P) = P c$

Allocation. Buy orders $\ge P_{eq}$ & sell orders $\le P_{eq}$

Traders' behaviour. Adjust value to account for TCs

• Constant fees: $v_b^{net} = v_b^{gross} - c$ and $v_s^{net} = v_s^{gross} + c$



Figure 10 (Price fees). Net values (Left.) and revealed demand and supply (Right.)

Hidden Transaction Costs

Buy & sell prices. Chosen ex-post

- without any commitment
- only constraint: $D(P_b) = S(P_s)$

Allocation. Buy orders $\ge P_b$ & sell orders $\le P_s$

Traders' behaviour. No adjustment needed



Figure 11 (Hidden TCs). Net values (Left.) and revealed demand and supply (Right.)

The Static Market

Proposition (Equivalence). In a static market, the same set of market performances can be achieved for hidden transaction costs and transparent transaction costs.



Figure 12. Market performance is specified by the trading volume. Any trading volume is achievable by scaling TCs (Jantschgi et al. 2024).



Figure 13. The market performance is fully specified by the trading volume. Any trading volume is achievable by setting the spread.

Hidden Transaction Costs

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The Dynamic Market

Theorem (Transparent TCs \rightarrow Stable Prices).

- 1. Excess demand & supply do not influence the marketclearing price. It remains constant over time.
- 2. Thus, as the spread is a deterministic function of the market-clearing price, it remains constant over time.



Figure 14. Evolution of a market with linear demand and supply and price fees.

Theorem (Hidden TCs \rightarrow Price Cycles).

- 1. Short-run: The spread gradually decreases, before it jumps back to a wider baseline.
- 2. Long-run: After every new global minimum, the sequence resets and starts from the beginning.



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Equilibrium Analysis

Traders' Beliefs.

- Transparent TCs \rightarrow Deterministic belief $\sigma^T > 0$ \rightarrow Market \approx Deterministic lottery
- Hidden TCs \rightarrow Beliefs about cycle $\sigma^H > 0$

 \rightarrow Market \approx Proper lottery

Traders' Utility. CARA $\leftrightarrow u_{\alpha}(\sigma) = \frac{(1-e^{-(1-\sigma)\alpha})}{\alpha}$



Figure 17. Different levels of risk aversion.

Equilibrium. (σ^T, σ^H) with $u_{\alpha}(\sigma^T) = \mathbb{E}_i[u_{\alpha}(\sigma^H)]$

Theorem. An equilibrium (σ^T, σ^H) exists.

- Comparative statics: σ^T is stric. increasing in α .
- <u>Sub-monopoly pricing</u>: $\sigma^T < \sigma^0$
- <u>Efficiency</u>: High $\alpha \to Eff^{\infty}(\sigma^{T}) < Eff^{\infty}(\sigma^{H})$ Low $\alpha \to Eff^{\infty}(\sigma^{T}) > Eff^{\infty}(\sigma^{H})$

Extension. Traders have different risk-attitudes

 \rightarrow Equilibrium existence + Market segmentation

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Strategic Market Entry Conclusion

Forward-Looking Traders

Strategic market entry for patient traders.

- Aggressive limit order → not executed immediately, but at a good point in the cycle
- Traders estimate the lowest spread in the cycle



Figure 18. Traders guess lowest point of the cycle.

Meta Theorem. Strategic market entry

- is irrelevant for transparent TCs.
- can lead to market failure for hidden TCs.

Problem with hidden TCs

- a. Traders guess lowest spread $\boldsymbol{\sigma}$
- b. Excess demand & supply after σ
- c. New price cycles with σ as baseline
- d. Traders guess new minimum
- e. Iterate until baseline is not profitable

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Conclusion

There is a hidden cost of 'zero commission'...

... but it's not a priori clear who pays it.





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App Store

Maybe the Traders.

Myopic traders may incur increased costs due to market volatility.

Maybe the Platform.

Forward-looking traders may reduce its revenue, up to market failure.

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