

# **The End of Market Discipline? Investor Expectations of Implicit Government Guarantees<sup>1</sup>**

**Viral V. Acharya<sup>2</sup>**  
NYU-Stern, CEPR and NBER

**Deniz Anginer<sup>3</sup>**  
Virginia Tech

**A. Joseph Warburton<sup>4</sup>**  
Syracuse University

March, 2015

## **Abstract**

Using bonds traded in the U.S. between 1990 and 2012, we find that bond credit spreads are sensitive to risk for most financial institutions, but not for the largest institutions. This “too big to fail” relationship between firm size and risk-sensitivity of bond spreads is not seen in non-financial sectors. We confirm the robustness of our results by employing different measures of risk, controlling for bond liquidity, conducting an event study around shocks to investor expectations of government guarantees, examining explicitly and implicitly guaranteed bonds of the same firm, and using agency ratings of government support for financial institutions.

*JEL Classifications:* G21, G24, G28.

*Keywords:* Too big to fail, financial crisis, Dodd-Frank, bailout, implicit guarantee, moral hazard, systemic risk.

---

<sup>1</sup> We thank Barry Adler, Neville Arjani, Andrew Atkeson, Leonard Burman, Asli Demircug-Kunt, Lisa Fairfax, Renee Jones, Bryan Kelly, Benjamin Klaus, Randall Kroszner, Stefan Nagel, Donna Nagy, Michael Simkovic, and conference/seminar participants at the American Finance Association annual meeting, Banque de France - Toulouse School of Economics Conference, International Atlantic Economic Conference, FDIC 13<sup>th</sup> Annual Bank Research Conference, NYU Stern, University of Chicago, George Washington University, Federal Reserve Bank of Minneapolis, Federal Reserve Bank of Philadelphia, Yale-Stanford-Harvard Junior Faculty Forum, and the Northern Finance Association annual meeting. We also thank Min Zhu for excellent research assistance. All errors are our own. This project was made possible through the support of grants from the John Templeton Foundation and the World Bank. The opinions expressed in this publication are those of the authors and do not necessarily reflect the views of the John Templeton Foundation or the World Bank.

<sup>2</sup> C V Starr Professor of Economics, Department of Finance, New York University Stern School of Business, New York NY 10012, E-mail: vacharya@stern.nyu.edu.

<sup>3</sup> Assistant Professor of Finance, Pamplin College of Business, Virginia Tech, Falls Church VA 22043, E-mail: danginer@vt.edu.

<sup>4</sup> Associate Professor of Law & Finance, Whitman School of Management & College of Law, Syracuse University, Syracuse NY 13244, E-mail: warburto@syr.edu.

# **The End of Market Discipline? Investor Expectations of Implicit Government Guarantees**

March, 2015

## **Abstract**

Using bonds traded in the U.S. between 1990 and 2012, we find that bond credit spreads are sensitive to risk for most financial institutions, but not for the largest institutions. This “too big to fail” relationship between firm size and risk-sensitivity of bond spreads is not seen in non-financial sectors. We confirm the robustness of our results by employing different measures of risk, controlling for bond liquidity, conducting an event study around shocks to investor expectations of government guarantees, examining explicitly and implicitly guaranteed bonds of the same firm, and using agency ratings of government support for financial institutions.

*JEL Classifications:* G21, G24, G28.

*Keywords:* Too big to fail, financial crisis, Dodd-Frank, bailout, implicit guarantee, moral hazard, systemic risk.

## **I. Introduction**

It is often assumed that investors expect government bailouts for major financial institutions should they encounter financial difficulty. But few studies in the existing literature have attempted to provide evidence of that expectation of government support. In this paper, we show that an implicit government guarantee is priced by debtholders of major financial institutions. Expectations of government support result in a distortion in how risk is reflected in the debt prices of large financial institutions and allows these institutions to borrow at favorable rates.

The too-big-to-fail (TBTF) doctrine holds that the government will not allow large financial institutions to fail if their failure would cause significant disruption to the financial system and economic activity. The expectation by the market that the government will provide a bailout is referred to as an implicit guarantee; implicit because the government does not have any explicit, ex ante commitment to intervene. In the absence of an implicit government guarantee, market participants would evaluate a bank's financial condition and incorporate those assessments into securities' prices, demanding higher yields on uninsured debt in response to greater risk taking by the bank. However, for the market to discipline banks in this manner, debtholders must believe that they will bear the cost of a bank becoming insolvent or financially distressed. An implicit government guarantee dulls market discipline by reducing investors' incentives to monitor and price the risk taking of potential TBTF candidates. Anticipation of government support for major financial institutions could enable the institutions to borrow at costs that do not reflect the risks otherwise inherent in their operations.

On the other hand, some claim that investors do not expect the government to actually implement TBTF policies, as there is no formal obligation to do so. The possibility of a bailout

may exist in theory but not reliably in practice, and as a result, market participants do not price implicit guarantees. The U.S. government's long-standing policy of "constructive ambiguity" (Freixas 1999; Mishkin 1999) is designed to encourage that uncertainty. To prevent investors from pricing implicit support, authorities do not typically announce their willingness to support institutions they consider too big to fail. Rather, they prefer to be ambiguous about which troubled institutions, if any, would receive support. Ever since the U.S. Comptroller of the Currency named eleven banks "too big to fail" in 1984, authorities have walked a thin line between supporting large institutions and declaring that support was neither guaranteed nor to be expected, permitting institutions to fail when possible to emphasize the point. This has led authorities to take a seemingly random approach to intervention, for instance by saving AIG but not Lehman Brothers, in order to make it difficult for investors to rely on a government bailout.<sup>1</sup> Some also claim that the introduction of new financial regulations, like the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank), may have eliminated TBTF expectations. Hence, it is an empirical question whether the implicit guarantee is considered credible by market participants and is therefore priced.

In this paper, we examine the relationship between the risk profiles of U.S. financial institutions and the credit spreads on their bonds. We find that expectations of government support are embedded in the credit spreads on bonds issued by major financial institutions. We show that while a positive relationship exists between risk and credit spreads for medium and small institutions, the risk-to-spread relationship is significantly weaker for the largest institutions. Because they pay a lower price for risk than other financial institutions, the large institutions receive a funding advantage as a result of the perceived guarantee.

---

<sup>1</sup> In a press briefing the day Lehman Brothers filed for bankruptcy, U.S. Treasury Secretary Henry Paulson said: "Moral hazard is something I don't take lightly."

We show that this relationship between firm size and risk sensitivity of bond spreads is not present in non-financial sectors. Comparing financial firms to non-financial firms allows us to control for general advantages associated with size that may affect both the level of spreads and the pricing of risk. For instance, larger firms may have lower funding costs due to greater diversification, larger economies of scale, or better access to capital markets and liquidity in times of financial turmoil. Such general size advantages are likely to affect the cost of funding for large firms in industries beyond just the financial sector. We use a difference-in-differences approach and compare differences in spreads of large and small financial institutions to differences in spreads of large and small companies in non-financial sectors. If bond investors believe that all of the largest firms (both financial and non-financial) are too-big-to-fail, then large non-financial firms should enjoy a funding advantage similar to that of large financial institutions. However, we find this is not the case. We find that a substantial size funding advantage exists for financial institutions even after controlling for the effect of size on credit spreads for non-financial firms.

We also use the difference-in-differences approach in examining the sensitivity of credit spreads to changes in risk. We find that the risk sensitivity of spreads is substantially weaker for large financial institutions than for large non-financial firms. These differences we observe between financial and non-financial firms are not due to differences in the liquidity of their bonds. Our results are robust to controlling for various measures of liquidity. In addition, we show that the differences in liquidity between large financial and non-financial bonds are not significant.

To further alleviate endogeneity concerns, we carry out three additional analyses. First, we examine credit rating agencies' expectations of government support. Certain rating agencies

(such as Fitch) estimate a financial institution's stand-alone financial condition separate from its likelihood of receiving external support. Using these third-party estimates of risk and support, we again find that investors price an institution's likelihood of support.

Next, we conduct an event study to examine shocks to investor expectations of support. We find that, following the collapse of Lehman Brothers, larger financial institutions experienced greater increases in their credit spreads than smaller institutions experienced. The spreads of large financial institutions also became more risk sensitive after the collapse of Lehman. Following the government's rescue of Bear Stearns and the adoption of the Troubled Asset Relief Program (TARP) and other liquidity and equity support programs, larger financial institutions experienced greater reductions in credit spreads than smaller institutions experienced. The spreads of large financial institutions also became less risk sensitive after these events. These event study results continue to hold when we use a triple-differencing approach and use non-financial firms as controls.

Finally, we compare *implicitly* guaranteed bonds to *explicitly* guaranteed bonds issued by the same firm. We examine within-firm variation of the effect of potential implicit support by examining the bonds of firms that have been explicitly guaranteed under the Federal Deposit Insurance Corporation's (FDIC) Temporary Liquidity Guarantee Program. The results confirm our main findings: investors expect the government to bail out TBTF financial institutions should they falter, even after the adoption of Dodd-Frank.

The funding advantage of large institutions does not arise because they are safer than smaller ones. Our findings contradict the "charter value" hypothesis put forth by Bliss (2001, 2004) and others. We examine the effectiveness of outside discipline on the risk-taking behavior of financial institutions. While we find that the risk of a financial institution, on average, is

responsive to various measures of outside discipline (e.g., Duan, Moreau and Sealy 1992), this is not the case for the largest financial institutions. We examine the sensitivity of leverage to changes in firm risk, and find that this relationship breaks down for large financial institutions. We also examine the fair value of insuring firm liabilities in order to study the incentive of financial institutions to shift risk onto taxpayers. We find that large financial institutions have a greater ability to shift risk than their smaller counterparts. We find similar results when we repeat the analyses using non-financials as a control.

We find that the implicit subsidy has provided TBTF institutions an average funding cost advantage of approximately 30 basis points per year over the 1990-2012 period. Examining the pricing of risk, we find that the sensitivity of debt prices to changes in risk is 75% weaker for the largest financial institutions compared to the others.

Our contribution to the literature is twofold. First, we provide evidence that bond spreads are less sensitive to firm risk for large financial institutions than for other financial institutions. Unlike prior work on the risk sensitivity of bank debt, we examine the risk sensitivity of debt separately for large versus small financial institutions. We also show that leverage and capital ratios of large financial institutions are less sensitive to changes in risk, and that large financial institutions are able to engage in greater risk-shifting onto the public safety net. Our second contribution is to show that this relationship between firm size and risk sensitivity of bond spreads is not present in non-financial sectors and is robust to alternative approaches to address potential endogeneity.

In the next section, we discuss the related literature. In Section III, we describe the data and methodology. Our main results are described in Section IV. Section V contains robustness tests. We conclude in Section VI.

## **II. Related Literature**

A large literature examines whether the market can provide discipline against bank risk taking (DeYoung et al. 2001; Jagtiani, Kaufman and Lemieux 2002; Morgan and Stiroh 2000; Calomiris 1999; Levonian 2000; and Flannery 1998). This literature examines whether there is a relationship between a bank's funding cost and its risk. Studies present some evidence that subordinated debt spreads reflect the issuing bank's financial condition and consequently propose that banks be mandated to issue subordinated debt. While these studies find that a bank's risk profile has some effect on credit spreads, the existence of risk-sensitive pricing does not necessarily mean that investors are not also pricing an implicit guarantee.

In contrast to the extensive literature studying the spread-to-risk relationship in banking, a much smaller literature focuses on the role of implicit government guarantees in that relationship. Kroszner (2013) and Strahan (2013) provide reviews and discussions of this literature. These studies examine how the spread-to-risk relationship changes as investor perceptions of implicit government support changes. Their premise is that investors will price bank-specific risk to a lesser extent during periods of perceived liberal application of TBTF policies, and will price bank-specific risk to a greater extent during periods of perceived restricted application of TBTF policies. The empirical results, however, have been mixed.

Flannery and Sorescu (1996) examine yield spreads on subordinated debt of U.S. banks over the 1983-1991 period. They believe that the perceived likelihood of a government guarantee declined over that period, which began with the public rescue of Continental Illinois in 1984 and ended with the passage of the FDIC Improvement Act (FDICIA) in 1991. They find that yield spreads were not risk sensitive at the start of the period, but came to reflect the specific



risks of individual issuing banks at the end of the period, as conjectural government guarantees weakened. Sironi (2003) reaches a similar conclusion in his study of European banks during the 1991-2001 period. During this period, Sironi argues, implicit public guarantees diminished due to the loss of monetary policy by national central banks and budget constraints imposed by the European Union. Sironi uses yield spreads on subordinated debt at issuance to measure the cost of debt and finds that spreads became relatively more sensitive to bank risk in the second part of the 1990s, as the perception of government guarantees diminished. In other words, these studies argue that as the implicit guarantee was diminished through policy and legislative changes, debt holders came to realize that they were no longer protected from losses and responded by more accurately pricing risk. Other studies, however, reach different conclusions about the spread-risk relationship. These studies focus on banks declared “too big to fail” by the Comptroller of the Currency in 1984. Morgan and Stiroh (2005) determine that the spread-risk relationship was flatter for the named TBTF banks than it was for other banks. They find that this flat relationship for the TBTF banks existed during the 1984 bailout of Continental Illinois and persisted into the 1990s, even after the passage of FDICIA, contrary to the findings of Flannery and Sorescu (1996). Similarly, Balasubramanian and Cyree (2011) suggest that the spread-risk relationship flattened for the TBTF banks following the rescue of Long-Term Capital Management in 1998. The studies in this strand of the literature do not examine the sensitivity of large banks to smaller banks or compare them against non-financial institutions.

Since the financial crisis, there has been renewed interest in measuring bank funding cost differentials arising from expectations of support. Recent attempts generally fall into three broad categories based on the approach taken: credit ratings, deposits, and bond yield spreads.

Credit rating studies focus on the rating “uplift” that a financial institution receives from a rating agency as a result of expectations of government support. The uplift in ratings is then translated into a basis point savings in bond yields (Ueda and Mauro 2012; Rime 2005). These studies, however, measure reductions in funding costs only indirectly, by studying differences in credit ratings, not directly using market price data. Market prices reflect the expectations of actual investors in the market and, for many institutions, are available almost continuously. As a result, while these studies might support the notion that an implicit guarantee exists, they do not provide a precise measure of it.

Deposit studies focus on differences in interest rates paid on uninsured deposits for banks of different sizes (e.g., Jacewitz and Pogach 2013). This approach, however, relies on the assumption that interest rate differentials are attributable to expectations of government support. Other factors could affect uninsured deposit rates, such as the wider variety of services that large banks can offer relative to those offered by small banks, and the lower cost at which they can provide those services.

A third approach, which we employ, uses bond prices to examine funding cost differentials for TBTF and non-TBTF financial institutions, following the earlier literature. The difference in bond spreads between TBTF and non-TBTF institutions, after controlling for risk and other factors, is interpreted as a measure of the funding subsidy TBTF institutions receive from expectations of government support. Unlike prior studies, however, we undertake a more detailed analysis of the role TBTF status plays in the spread-risk relationship, and employ multiple measures of TBTF status (some size-based and some systemic risk-based). In addition, we employ a difference-in-differences approach and show that the effect of firm size on bond spreads is not similarly present in non-financial sectors and hence is not due to size itself.

Moreover, our results are robust to controls for liquidity and multiple measures of risk. We also address endogeneity issues by performing event studies and additional robustness tests.

### **III. Data and Methodology**

We collect data for financial firms and non-financial firms that have bonds traded during the 1990 to 2012 period. Financial firms are classified using Standard Industrial Classification (SIC) codes of 60 to 64 (banks, broker-dealers, exchanges, and insurance companies), and 67 (other financial firms). We exclude debt issued by government agencies and government-sponsored enterprises. Firm-level accounting and stock price information are obtained from COMPUSTAT and CRSP for the 1990–2012 period. Bond data come from three separate databases: the Lehman Brothers Fixed Income Database (Lehman) for the 1990-1998 period, the National Association of Insurance Commissioners Database (NAIC) for the 1998-2006 period, and the Trade Reporting and Compliance Engine (TRACE) system dataset for the 2006-2012 period. We also use the Fixed Income Securities Database (FISD) for bond descriptions. Although the bond dataset starts in 1980, it has significantly greater coverage starting in 1990. In this paper, we focus on the 1990-2012 period.

Our sample includes all bonds issued in the U.S. by firms in the above datasets that satisfy selection criteria commonly used in the corporate bond literature (e.g., Anginer and Yildizhan 2010; Anginer and Warburton 2014). We exclude all bonds that are matrix-priced (rather than market-priced). We remove all bonds with equity or derivative features (i.e., callable, puttable, and convertible bonds), bonds with warrants, and bonds with floating interest rates. Finally, we eliminate all bonds that have less than one year to maturity. There are a number of extreme observations for the variables constructed from the bond datasets. To ensure

that statistical results are not heavily influenced by outliers, we set all observations higher than the 99<sup>th</sup> percentile value of a given variable to the 99<sup>th</sup> percentile value. There is no potential survivorship bias in our sample, as we do not exclude bonds issued by firms that have gone bankrupt or bonds that have matured. In total, we have over 300 unique financial institutions with 45,000 observations, and about 1,000 non-financial firms with 75,000 observations, that have corresponding credit spread and total asset information (Table 1).

For each firm, we compute the end-of-month credit spread on its bonds (*spread*), defined as the difference between the yield on its bonds and that of the corresponding maturity-matched Treasury bond. We are interested in systemically important financial institutions, as these firms will be the beneficiaries of potential TBTF interventions. While we focus on large institutions, we recognize that factors other than size may cause an institution to be systemically important. For instance, a large firm with a simple, transparent structure (such as a manager of a family of mutual funds) might fail without imposing significant consequences on the financial system, while a relatively small entity (such as a mortgage insurer) that fails might cause substantial stress to build up within the system (Rajan 2010). Characteristics that tend to make an institution “too systemic to fail” include interconnectedness, number of different lines of business, transparency and complexity of operations. But these characteristics tend to be highly correlated with the size of a financial institution’s balance sheet. Adrian and Brunnermeier (2011), for instance, show that the systemic risk contribution of a given financial institution is driven significantly by the relative size of its assets. Dodd-Frank also emphasizes size in defining systemically important financial institutions. Large size even without significant interconnectedness may carry political influence (Johnson and Kwak 2010). We employ multiple measures of firm size. One is the size (log of assets) of a financial institution (*size*) in a

given year. A second is whether a financial institution is in the top 90<sup>th</sup> percentile of financial institutions ranked by assets in a given year (*size90*), and a third is whether a financial institution is one of the ten largest institutions in terms of size in a given year (*size\_top\_10*).<sup>2</sup> These latter two measures are meant to capture very large institutions, which are likely to benefit most from TBTF policies. As mentioned earlier, although systemic importance and size are likely to be highly related, there could be areas of differences. Hence, for robustness, we also examine too-big-to-fail in relation to systemic importance by using two commonly-utilized measures of systemic importance: the Adrian and Brunnermeir (2011) Covar measure (*covar*), and the Acharya, Engle and Richardson (2012) and Acharya et al. (2010) systemic risk measure (*srisk*). The computation of these systemic importance measures is in Appendix A.

A number of different measures of credit risk have been used in the literature. We use Merton’s distance-to-default (*mertondd*) as our primary risk measure (*risk*). Distance-to-default is based on Merton’s (1974) structural credit risk model. In his model, the equity value of a firm is modeled as a call option on the firm’s assets, which is used to compute asset values and asset volatility. Distance-to-default is the difference between the asset value of the firm and the face value of its debt, scaled by the standard deviation of the firm’s asset value.<sup>3</sup> We follow Campbell, Hilscher and Szilagyi (2008) and Hillegeist et al. (2004) in calculating Merton’s distance-to-default. The details of the calculation are in Appendix A. A higher distance-to-default number signals a lower probability of insolvency.

---

<sup>2</sup> For non-financial firms, we compute similar measures. Since financials make up close to 40% of the sample, we group non-financial firms separately when we rank these firms by size and assign a dummy variable if they are in the top 90<sup>th</sup> percentile in terms of size. We found similar results grouping non-financial firms into 5 or 10 Fama-French industry groups and then ranking them by size.

<sup>3</sup> The Merton distance-to-default measure has been shown to be a good predictor of defaults, outperforming accounting-based models (Campbell, Hilscher and Szilagyi 2008; Hillegeist et al. 2004). Although the Merton distance-to-default measure is more commonly used in bankruptcy prediction in the corporate sector, Merton (1977) points out the applicability of the contingent claims approach to pricing deposit insurance in the banking context. Anginer and Demircug-Kunt (2014), Bongini, Laeven, and Majnoni (2002), and others have used the Merton model to measure the default probabilities of commercial banks.

Implicit guarantees might affect equity values resulting in underestimation of risk using the Merton (1974) distance-to-default model. To address this concern, we verify our results using alternative measures of risk. We use z-score (*zscore*), an accounting-based measure of risk, computed as the sum of return on assets and equity ratio (ratio of book equity to total assets), averaged over four years, divided by the standard deviation of return on assets over four years (Roy 1952). The z-score measures the number of standard deviations that a financial institution’s rate of return on assets can fall in a single period before it becomes insolvent. A higher z-score signals a lower probability of insolvency. A z-score is calculated only if we have accounting information for at least four years. We also compute an adjusted distance-to-default measure, by removing the effect of size on market leverage and standard deviation of equity returns. Each month, we run a cross-sectional regression of equity volatility and market leverage on *size*.<sup>4</sup> We then compute adjusted market leverage and volatility values by multiplying the coefficient on the size variable from the regression by the median firm size in a given month. We run the regression and compute the median values separately for the financial and non-financial firms. We use adjusted market leverage and adjusted volatility to compute an adjusted distance-to-default measure (*adj-mertondd*).<sup>5</sup> To make sure that the results are not sensitive to a particular specification, we also create a second alternative measure of distance-to-default, which places more weight on recent equity returns in computing standard deviations.<sup>6</sup> Following Longerstaey et al. (1996), we use a weighting coefficient of 0.94. We use the exponential moving average method (EWMA) to compute standard deviations, which are then used to construct this alternative distance-to-default measure (*ewma-mertondd*). We also use equity

---

<sup>4</sup> Market leverage is computed as total liabilities divided by the sum of market equity and total liabilities.

<sup>5</sup> We also computed a distance-to-default measure that uses scaled standard deviation values as an input. In particular, the standard deviations of banks in the top 90th percentile in terms of size are scaled to equal those of all other banks. We obtain similar results using this risk measure.

<sup>6</sup> Exponentially weighted moving average standard deviations are computed as:  $\sigma_{i,t}^2 = \lambda \sigma_{i,t-1}^2 + (1 - \lambda) \varepsilon_{i,t-1}^2$ .

return volatility (*volatility*), without imposing any structural form, as a risk measure.<sup>7</sup> Volatility is computed using daily data over the past 12 months. Finally, we use credit risk beta, *dd-beta*, to capture exposure to systematic credit risk shocks. It is obtained by regressing a firm's monthly change in distance-to-default on the monthly change in value-weighted average distance-to-default of all other firms using 36 months of past data.<sup>8</sup>

Following Flannery and Sorescu (1996) and Sironi (2003), our firm-level controls include leverage, return on assets, market-to-book ratio and maturity mismatch. Our bond-level controls include time to maturity and seniority of the bonds. For the firm-level controls, leverage (*leverage*) is the ratio of total liabilities to total assets. Return on assets (*roa*) is the ratio of annual net income to year-end total assets. Market-to-book ratio (*mb*) is the ratio of the market value of total equity to the book value. Maturity mismatch (*mismatch*) is the ratio of short-term debt minus cash to total debt. Bond level controls include time to maturity (*ttm*) in years and a dummy variable that indicates whether the bond is senior (*seniority*). We also include three macro factors: the market risk premium (*mkt*), the yield spread between long-term (10-year) Treasury bonds and the short-term (three-month) Treasuries (*term*) as a proxy for unexpected changes in the term structure, and the BAA-AAA corporate bond spread (*def*) as a proxy for default risk. The construction of the variables is in Appendix A.

We also compute two sets of liquidity measures based on transaction data availability. First, liquidity measures are computed for the time period starting in 2003, after the introduction of TRACE. We use all bond transactions to compute four liquidity measures in this set. The first measure is based on Amihud (2002) and measures the price impact of trading a particular

---

<sup>7</sup> Atkeson, Eisfeldt and Weill (2014) show theoretically that one can approximate a firm's distance to insolvency using data on the inverse of the volatility of that firm's equity returns.

<sup>8</sup> In computing *dd-beta*, we require the company to have at least 24 non-missing monthly changes in distance-to-default over the previous 36 months.

bond. The *amihud* measure is computed as the average absolute value of daily returns divided by total daily dollar volume. We also use a range-base measure (*range*) to proxy for price impact, following Jirnyi (2010). *range* is computed as the average of the high and low price differential in a given day scaled by the square root of dollar volume. The *roll* measure captures transitory price movements induced by lack of liquidity and proxies for the bid-ask spread of a bond, based on the work of Roll (1984). The *roll* measure is computed as the covariance of consecutive price changes. The fourth measure, *zeros*, is based on trading activity and is computed as the percentage of days during a month in which the bond did not trade. We also compute an aggregate liquidity measure, *lambda*, that combines the four liquidity measures described above. Following Dick-Nielsen, Feldhutter and Lando (2012), we standardize the liquidity measures for each bond each month and then aggregate these standardized measures to compute *lambda*.

Second, a liquidity measure is computed for the full time period, including years prior to 2003. We compute a liquidity measure based on bond characteristics following Longstaff, Mithal and Neis (2005). This measure, *liquidity*, is computed based on four bond characteristics – amount outstanding, age, time-to-maturity and rating. The maximum liquidity value assigned to a bond is four and the minimum liquidity value is zero. The construction of the liquidity variables is described in detail in Appendix A.

Summary statistics are reported in Table 1. Panel A reports summary statistics for financial firms and Panel B reports summary statistics for non-financial firms. Although it is larger financial institutions that issue public debt, we see significant dispersion in asset size.



Following the empirical model in Campbell and Taksler (2003) and Gopalan, Song and Yerramilli (2012), we estimate the following regression using a panel with one observation for each bond-month pair:

$$\begin{aligned} Spread_{i,b,t} = & \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} \\ & + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + Firm\ FE + Year\ FE \\ & + \varepsilon_{i,b,t} \end{aligned} \quad (1)$$

In equation (1), the subscripts  $i$ ,  $b$ , and  $t$  indicate the firm, the bond, and the time (month), respectively, and  $FE$  denotes fixed effects. The dependent variable (*spread*) is the credit spread. To measure the systemic importance of an institution (*TBTF*), we use multiple measures of an institution's size and systemic risk contribution, as discussed above.

## IV. Results

In this section, we examine whether bondholders of major financial institutions have an expectation of government support by investigating the relationship between an institution's systemic importance and its credit spreads, after controlling for risk and other variables. We also examine the impact of an institution's size on the credit spread-to-risk relationship. We then analyze the effectiveness of outside discipline on the risk-taking behavior of financial institutions. Finally, we quantify the value of the funding subsidy TBTF institutions received on a yearly basis over the 1990-2012 period.

### 1. Expectations of Government Support

To determine whether bondholders of major financial institutions expect government support, we estimate how the size of a financial institution affects the credit spread on its bonds,

using equation (1). The results appear in Table 2. The table shows a significant inverse relationship between credit spreads and systemic importance. First, we use asset size (*size*) to identify systemic importance. In column 1, we see that *size* has a significant negative effect on *spread*, with larger institutions having lower spreads. In column 2, we control for time-invariant firm heterogeneity by including firm fixed effects and *size* remains significant. Next, we identify systemic importance as a financial institution in the top 90<sup>th</sup> percentile in terms of size (*size90*) (column 3). The coefficient on the *size90* dummy variable is significant and negative, indicating that very large institutions have lower spreads. In column 4, we define a systemically important institution as one of the ten largest institutions in terms of size in a given year (*size\_top\_10*). Results again show that TBTF status has a significant negative effect on spreads.

We also look at whether the size-spread relationship varies by type of financial institution. We interact *size* with a dummy variable indicating whether the financial institution is a bank, insurance company or broker-dealer (based on its SIC code). The results appear in column 5 of Table 2. The effect of size on spreads is most significant for the banks. Size does not reduce spreads as much when the financial institution is an insurance company or a broker-dealer.

There may be advantages associated with size that are not fully captured by the control variables. As mentioned earlier, larger firms may have lower funding costs due to greater diversification, larger economies of scale, or better access to capital markets and liquidity in times of financial turmoil. We control for such general size advantages in estimating investor expectations of government support by using non-financial firms as controls. We use a difference-in-differences approach and compare differences in spreads of large and small financial institutions to differences in spreads of large and small companies in non-financial

sectors. If investors expect government support only for financial firms, then the estimate of the large-small difference in the financial sector compared to the large-small difference in non-financial sectors (without an expectation of government support of large firms) would provide a measure of the advantage large financial firms have from expectations of government support.<sup>9</sup> Therefore, for robustness, we include non-financial companies (column 6 of Table 2) as controls. A dummy variable (*financial*) is set equal to one for a financial firm and zero for a non-financial firm. We are interested in the term interacting *financial* with *size90*.<sup>10</sup> This interaction term captures the differential effect size has on spreads for financial firms compared to non-financial firms. The estimated coefficient is negative and statistically and economically significant, which indicates that the effect of size on spreads is larger for financial firms than for non-financial firms.

In addition to indicating a relationship between credit spreads and the size of a financial institution, Table 2 also shows that there is a significant relationship between credit spreads and the risk of a financial institution. The coefficient on distance-to-default (*mertondd*) is significant and negative in Table 2. This result indicates that less-risky financial institutions (those with a greater distance-to-default) generally have lower spreads on their bonds.

Does a financial institution's size affect this relationship between credit spreads and risk? To answer that question, we interact the size and risk variables. The results are in Table 3 (Panel A). For brevity, we report only variables of interest in this table. There is a significant and positive coefficient on the term interacting *size90* and *mertondd* (column 1). This indicates that the spread-to-risk relationship diminishes with TBTF status. For institutions that achieve systemically-important status, spreads are less sensitive to risk. This result is consistent with

---

<sup>9</sup> If there is an expectation of government support for non-financial firms (such as General Motors; see Anginer and Warburton 2014), then we would be underestimating the funding advantage to large financial institutions.

<sup>10</sup> *Size90* indicates a firm in the top 90<sup>th</sup> percentile of its size distribution.

investors pricing an implicit government guarantee for the largest financial institutions. In column 7, we add an additional dummy variable indicating an institution between the 60<sup>th</sup> and 90<sup>th</sup> percentiles (*size60*). We interact both size dummy variables with *mertondd*. The interaction coefficient on *size60* lack significance. These results indicate that the effect of size on the spread-to-risk relationship comes from the very large financial institutions. In economic terms, a one standard deviation increase in distance-to-default reduces spreads by 60 bps in the overall sample. But for financial institutions in the top 90th percentile in terms of size, a one standard deviation increase in distance-to-default reduces spreads by only 12 bps. In comparison, for institutions between the 60th and 90th percentiles, spreads are reduced by 51 bps.

Moreover, these results are robust to different measures of risk. In place of *mertondd*, we employ z-score (*zscore*) in column 2 and volatility (*volatility*) in column 3. In each specification, the coefficient on the interaction term is significant and offsets the coefficient on the risk variable, indicating that the spread-to-risk relationship diminishes for the largest institutions.

These relationships can be seen in Figure 1. The left panel of Figure 1 shows the relationship between the size of a financial institution and the credit spread on its bonds. It shows a negative relationship between size and spreads: larger institutions have lower spreads. Why do larger institutions have lower spreads? Are they less risky than smaller ones? The right panel of Figure 1 plots the size of a financial institution against its risk (distance-to-default). There does not appear to be any observable relationship between size and risk. That is, larger institutions do not offer lower risk of large losses than smaller institutions. Hence, Figure 1 provides evidence supporting the supposition that large institutions enjoy lower spreads because of implicit government support, not because of their underlying risk profiles.

We construct two alternative measures of distance-to-default to address potential issues with our specific model. As mentioned earlier, implicit guarantees might affect equity values resulting in underestimation of risk using Merton's (1974) distance-to-default model. First, we compute an adjusted distance-to-default measure, *adj-mertondd*, by removing the effect of size on market leverage and volatility (the two inputs into the Merton model) as described in Section III. We replicate the risk sensitivity analyses using *adj-mertondd* as our measure of risk. The results in column 4 of Table 3 are consistent with those in column 1 using the unadjusted distance-to-default measure, *mertondd*. The second alternative measure of distance-to-default employs standard deviations computed using the exponential moving average method (EWMA), *ewma-mertondd*. The results in column 5 are consistent with those in column 1.

Instead of distance-to-default, we also use credit risk beta, *dd-beta*, as our measure of risk. It is obtained by regressing a firm's monthly change in distance-to-default on the monthly change in value-weighted average distance-to-default of all other firms using 36 months of past data. If the implicit guarantee takes effect only if banks fail at the same time, then they will have incentives to take on correlated risks (Acharya, Engle and Richardson 2012; Acharya and Yorulmazer 2007) so as to increase the value of the implicit guarantee. Investors will then price in idiosyncratic but not systematic risk, since the guarantee will only take effect if a bank fails when others are failing at the same time. If the guarantee applies only to large banks, systematic risk would be priced negatively for larger banks and positively for smaller banks. Kelly, Lustig and Van Nieuwerburgh (2012), using options on individual banks and on a financial sector index, show evidence of a collective guarantee on the financial sector. They also show that larger financial institutions benefit relatively more than smaller ones do from implicit guarantees.

The interaction results using *dd-beta*, reported in column 6 of Table 3, support this notion. *dd-beta* is positive for smaller banks but turns negative for the largest financial institutions.

As before, we also compare financial institutions to non-financial institutions when examining the impact of risk on spreads. The results are reported in Panel B of Table 3. For brevity, we do not report coefficients on the control variables. We are interested in the *financial<sub>t-1</sub> × Risk<sub>t-1</sub> × size90<sub>t-1</sub>* variable. This triple interaction term captures the risk sensitivity of credit spreads of large financial institutions compared to that of large non-financials. We use the same six risk variables we used in Panel A: *mertondd*, *z-score*, *volatility*, *adj-mertondd*, *ewma-mertondd*, and *dd-beta*. We find that risk sensitivity declines more for large financial institutions than for large non-financial institutions. In other words, when we add non-financials as controls, we find the same reduction in risk sensitivity for large financials that we found in Panel A.

Finally, we examine the effectiveness of outside discipline on the risk-taking behavior of financial institutions. We use two methods to examine outside discipline's effect on risk. The first method is based on the concept that capital should increase with risk. We examine the sensitivity of leverage to changes in bank risk. We follow Duan, Moreau and Sealey (1992) and Hovakimian and Kane (2000) and assume a linear relationship between changes in market leverage and changes in risk as measured by changes in asset volatility. Since we are interested in cross-bank differences, we also interact change in asset volatility with our *TBTF* measure. In particular, we estimate the following empirical model:

$$\Delta D/V_{i,t} = \alpha + \beta^1 \Delta s_{A_{i,t}} + \beta^2 TBTF_{i,t} + \beta^3 TBTF_{i,t} \times \Delta s_{A_{i,t}} + Year\ FE + \varepsilon_{i,t} \quad (2)$$

where  $D$  is the book value of debt,  $V$  is the market value of assets, and  $s_A$  is the volatility of market value of assets.  $V$  and  $s_A$  are computed using the structural model of Merton (1974) described in Appendix A. In equation (2), a negative coefficient on asset volatility ( $\beta^1 < 0$ ) would indicate a moderating effect of market discipline in response to changes in risk. As risk increases, financial institutions are pressured to reduce their leverage. Similar to the sensitivity of spreads to risk, weaker market discipline would imply that leverage is less sensitive to changes in risk. That is, a positive coefficient on the interaction of asset volatility and our *TBTF* measure ( $\beta^3 > 0$ ) would imply that the leverage of larger financial institutions is less responsive to changes in risk.

The results are reported in Table 4. Consistent with Duan, Moreau and Sealey (1992), we find evidence of discipline. An increase in risk reduces leverage (column 1). We use *size* and *size90* as our measures of *TBTF*. The results from interacting these measures with asset volatility are reported in columns 2 and 3, respectively. The coefficients on both interaction terms are positive, indicating that *TBTF* status impedes outside discipline and reduces the sensitivity of leverage to changes in asset volatility. Finally, following our prior approach, we use large non-financial firms as controls in examining the impact of size on the relationship between leverage and risk. We interact the *size90* variable with asset volatility and the *financial* dummy. The results from the triple interaction regression are reported in column 4. The coefficient on the triple interaction term is positive (but not statistically significant) suggesting that the discipline effect is weaker for large financial firms compared to large non-financial firms.

The second method is based on the deposit insurance pricing model of Merton (1977). This approach compares the restraining effect of outside discipline to the strength of financial

institutions' incentives to take on risk. In particular, the model can be used to assess the risk-shifting behavior of financial institutions – whether they can increase risk without adequately compensating taxpayers by increasing their capital ratios or by paying higher premiums for government guarantees. Merton (1977) shows that the value of a government guarantee to the shareholders of a bank increases with asset risk and leverage. Holding the premium on a government guarantee fixed, bank shareholders can extract value from the government by increasing asset risk or leverage. To examine this relationship empirically, we follow Duan, Moreau and Sealey (1992) and use the following reduced-form specification:

$$\Delta IPP_{i,t} = \alpha + \gamma^1 \Delta s_{A,i,t} + \gamma^2 TBTF_{i,t} + \gamma^3 TBTF_{i,t} \times \Delta s_{A,i,t} + Year\ FE + \varepsilon_{i,t} \quad (3)$$

where  $IPP$  is the fair insurance premium per dollar of liabilities. The coefficient  $\gamma^1$  captures two offsetting effects: the risk-shifting incentives of financial institutions and outside discipline. To derive this relationship, we assume a linear approximation for the value of the liabilities put option,  $IPP_{i,t} = \alpha + \theta^1 D/V_{i,t} + \theta^2 s_{A,i,t}$ , and plug in the value of  $D/V_{i,t} = \delta + \beta^1 \Delta s_{A,i,t}$  from the relationship discussed above. After substitution,  $\gamma^1 = \frac{\partial IPP}{\partial s_A} + \frac{\partial IPP}{\partial D/V} \beta^1$ . The first term captures the incentives of financial institutions to increase risk, while the second term captures the offsetting effect of outside discipline (given  $\beta^1 < 0$ ) in moderating risk taking. A positive  $\gamma^1$  is consistent with the ability of financial institutions to risk-shift, since the disciplining effect does not completely neutralize incentives to increase risk. As before, we interact asset volatility with our  $TBTF$  measures, and use large non-financial institutions as controls. The results are reported in Table 4. On average, financial institutions are able to risk-shift, as evidenced by the positive coefficient on asset volatility (column 5). This risk-shifting effect is stronger for larger



financial institutions (columns 6 and 7). When we use large non-financial institutions as controls, we find the risk-shifting incentives of large financials to be greater than those of large non-financials (column 8).

## 2. Quantification of the Implicit Subsidy

As the above results show, major financial institutions enjoy a funding subsidy as a result of implicit government support. In this subsection, we provide an estimate of this subsidy on a yearly basis. To compute the annual subsidy, we run the following regression for each five year interval starting in 1990:

$$\begin{aligned} Spread_{i,b,t} = & \alpha + \beta^1 size90_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} \\ & + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + \varepsilon_{i,b,t} \end{aligned} \quad (4)$$

where our variable of interest, *size90*, indicates a firm in the top 90<sup>th</sup> percentile of firms by assets. The coefficient on *size90* represents the subsidy accruing to large financial institutions as a result of implicit government insurance. The estimated subsidy is plotted, by five year intervals, in Figure 2. The implicit subsidy provided large financial institutions a funding cost advantage of approximately 30 basis points over the 1990-2012 period. The subsidy increased during the crisis years and remains at elevated levels.

We also quantify the dollar value of the annual implicit subsidy accruing to major financial institutions. We multiply the reduction in funding costs by the average total uninsured liabilities (in US\$ millions) over a five year interval to determine the annual dollar value of the

subsidy, reported in Figure 2.<sup>11</sup> The subsidy amounts to on average \$30 billion per year and rose above \$70 billion during the financial crisis.

Despite the magnitude of the implicit subsidy, few studies have attempted to quantify it, although some have attempted to measure explicit government support (e.g., Laeven and Valencia 2010 and Veronesi and Zingales 2010). Direct costs of bailouts have always caught the public's attention. But direct costs provide only a narrow quantification of bailouts and likely underestimate their actual costs. Estimates of the direct, or ex post, cost of government interventions overlook the ex-ante cost of implicit support (i.e., the resource misallocation it induces), which is potentially far greater. While explicit support is relatively easy to identify and quantify, implicit support is more difficult and has received less attention.

Moreover, our approach recognizes that, even when the banking system appears strong, safety net subsidies exist for large financial institutions. Figure 2 shows that expectations of government support for large financial institutions persist over time. Expectations of support exist not only in times of crisis, but also in times of relative tranquility, and vary with government policies and actions. In the post-crisis period after 2009, the implicit subsidy has remained at positive levels.

## **V. Robustness**

In this section, we address the potential for endogeneity in the relationship between credit spreads and TBTF status. First, we examine in greater detail the relationship between the size of

---

<sup>11</sup> We exclude deposits backed by explicit government insurance. It is also possible that investors have different expectations of a guarantee for different aspects of liabilities of a given firm. Total uninsured liabilities, therefore, provides a rough estimate of the dollar value of the implicit guarantee.

a financial institution and its risk. Next, we examine credit ratings issued by Fitch, which provide third-party measures of an institution's credit risk and an institution's likelihood of receiving external support in a crisis. Third, we perform an event study to examine shocks to investor expectations of support. Fourth, we examine within-firm variation in government support by comparing non-guaranteed bonds to bonds issued by the same firm with an explicit government guarantee under the FDIC's Temporary Liquidity Guarantee Program. Finally, we control for bond liquidity to make sure that the spread differences are not due to differences in liquidity, and examine TBTF in relation to two measures of systemic importance based on systemic risk contribution variables (*covar* and *srisk*) commonly used in the literature.

## **1. The TBTF-Risk Relationship**

It is often claimed that large financial institutions are considered less risky by investors. Large institutions might benefit from government guarantees, reducing their risk of loss. But large financial institutions, by virtue of their size, might benefit from other factors that reduce the level of their risk vis-à-vis other financial institutions. For instance, large financial institutions might benefit from better investment opportunities. If so, they may have inherently less risky portfolios. In addition, large financial institutions might enjoy superior economies of scale and be better diversified than smaller ones. Studies suggest that economies exist in banking (Wheelock and Wilson 2001; Hughes and Mester 2011; McAllister and McManus 1993). However, economies are often attributed to advances in information and financial technology, as well as regulatory changes that have made it less costly for financial institutions to become large, not increasing size itself. Moreover, most research has concluded that economies exist only for financial institutions that are not very large (Berger and Humphrey 1994; Berger and Mester

1997).<sup>12</sup> This indicates that economies disappear once a certain size threshold is reached, with diseconomies emerging due to the complexity of managing large institutions and implementing effective risk-management systems (e.g., Laeven and Levine 2007; Demirguc-Kunt and Huizinga 2011).

In this subsection, we address the potential endogeneity. If investors believe risk-reducing benefits accompany large size for reasons other than TBTF guarantees, larger institutions should exhibit lower credit risk. Hence, we regress credit risk on size, with controls, as follows:

$$\begin{aligned}
 Risk_{i,t} = & \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 financial_{i,t-1} + \beta^3 TBTF_{i,t-1} \times financial_{i,t-1} \\
 & + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + Year\ FE + \varepsilon_{i,b,t}
 \end{aligned} \tag{5}$$

It is important to note that, as in equation (1), the explanatory variables are lagged, and one can think of the relationships in equations (1) and (5) as systems of equations. We use distance-to-default as our risk measure. The results for financial institutions appear in columns 1 and 2 of Table 5. We find *size* to be significantly associated with lower risk. This relationship, however, is not significant at the top of the size distribution: *size90* does not significantly affect risk. We also examine the impact of size on risk by comparing financial institutions to non-financial institutions in columns 3 and 4. We are interested in the *TBTF*×*financial* variable. This interaction term captures the differential effect size has on risk for financial institutions compared to non-financial institutions. The estimated coefficient is negative and economically

---

<sup>12</sup> The literature generally finds a U-shaped cost curve with a minimum typically reached within a range of \$10 billion to \$100 billion in assets, depending on the sample, time period, and methodology.

and statistically significant using both the *size* and *size90* variables, indicating that the effect of size on risk is smaller for financial institutions.

Overall, our results provide support for the large literature that has failed to detect efficiency and risk-reduction benefits for very large banks (e.g., Demirguc-Kunt and Huizinga 2011; Demsetz and Strahan 1997). In short, Table 5 shows that larger financial institutions are not less risky than smaller ones. Hence, it is not necessarily because of a reduction in underlying default risk that large institutions experience a reduction in their spreads. By showing that larger size does not imply lower risk, Table 5 supports our main finding that the credit market prices an expectation of government support for large financial institutions.

## **2. Stand-Alone and Support Ratings**

To further alleviate concerns about endogeneity, we use credit ratings and government-support ratings as alternative measures of credit risk and implicit support. We examine ratings issued by Fitch, which provide a third-party's estimate of credit risk and potential external support.

In rating financial institutions, Fitch assigns both an “issuer rating” and a “stand-alone rating.” Fitch's issuer rating is a conventional credit rating. It measures a financial institution's ability to repay its debts after taking into account all possible external support. In contrast, Fitch's stand-alone rating measures a financial institution's ability to repay its debts without taking into consideration any external support. The stand-alone rating reflects an institution's independent financial strength, or in other words, the intrinsic capacity of the institution to repay its debts. The difference between these two ratings reflects Fitch's judgment about government support should the financial institution encounter severe financial distress. We use Fitch's long-

term issuer rating (*issuer rating*) as well as their stand-alone rating (*stand-alone rating*) as independent variables in the spread regression specified in equation (1).<sup>13</sup>

Table 6 (Panel A) contains results of regressions similar to the spread regressions of Table 2, but with the addition of the rating variables. The stand-alone rating is employed in column 1. Column 2 employs the issuer rating. Although both ratings are significant in affecting spreads, the issuer rating has a greater economic impact on spreads. In column 3, both ratings are employed simultaneously. In that specification, the coefficient on the issuer rating remains significant and positive. Moreover, the effect of the issuer rating subsumes the effect of the stand-alone rating. In sum, we find that issuer ratings (which incorporate an expectation of support) impact spreads, but stand-alone ratings do not have a similar effect. Investors significantly price implicit government support for the institution. This result is consistent with the findings of Sironi (2003), who uses European data, and supports our conclusion that the expectation of government support for large financial institutions impacts the credit spreads on their bonds.

In Panel B of Table 6, issuer and stand-alone ratings are regressed on lagged TBTF measures and control variables. Both TBTF measures (*size* and *size90*) have a significant negative effect on the issuer rating (better ratings are assigned lower numerical values). The issuer rating incorporates expectations of government support, and we see that larger institutions have significantly better issuer ratings. In contrast, the TBTF measures do not have a significant effect on the stand-alone rating. The stand-alone rating excludes potential government support, and we find that large institutions do not have significantly better stand-alone ratings.

---

<sup>13</sup> The issuer rating scale ranges from AAA to C- (ratings below C- are excluded since they indicate defaulted firms). The stand-alone rating scale ranges from A to E. We transform the ratings into numerical values using the following rule: AAA=1, ..., C-=9 for the issuer rating and A=1, A/B=2, ..., E=9 for the stand-alone rating.

### 3. Event Study

Next, we examine how credit spreads were impacted by events that might have changed investor expectations of government support. The events and their corresponding dates are in Table 7. These events offer natural experiments to assess changes in TBTF expectations over time. For instance, prior to the recent financial crisis, investors may have been unsure about whether the government would guarantee the obligations of large financial institutions should they encounter financial difficulty, since there was no explicit commitment to do so. When Bear Stearns collapsed, its creditors were protected through a takeover arranged and subsidized by the Federal Reserve, despite the fact that Bear Stearns was an investment bank, not a commercial bank.<sup>14</sup> This intervention likely reinforced expectations that the government would guarantee the obligations of large financial institutions. Similarly, the later decision to allow Lehman Brothers to fail, in contrast, served as a negative shock to those expectations. Although the Federal Reserve and the Treasury intervened the day after Lehman was allowed to collapse (including a rescue of AIG's creditors), the government adopted a series of unpredictable and confusing policies around Lehman's collapse, making future intervention increasingly uncertain. Hence, both the Bear Stearns event and the Lehman event provide contrasting shocks to investor expectations of government support. We also examine other events that may have affected investor expectations positively. In particular, we examine the events surrounding the passage of

---

<sup>14</sup> In connection with Bear Stearns' merger with JP Morgan Chase in 2008, the Federal Reserve provided JP Morgan Chase with regulatory relief and nearly \$30 billion in asset guarantees, and Bear Stearns with lending support under section 13(3) of the Federal Reserve Act of 1913, the first time since the Great Depression that the Federal Reserve directly supported a non-bank with taxpayer funds. The Fed also announced the Primary Dealer Credit Facility, which opened the discount window to primary dealers in government securities, some of which are investment banks, bringing into the financial safety net investment banks like Lehman, Merrill Lynch, and Goldman Sachs.

the Troubled Asset Relief Program (TARP), as well as other announcements of liquidity and financial support to the banking sector.<sup>15</sup>

We examine a window of +/- 5 trading days around the event. We run the following regression:

$$\begin{aligned} Spread_{i,b,t} = & \alpha + \beta^1 post + \beta^2 TBTF_{i,t} \times post + \beta^3 Risk_{i,t} \times post + \beta^4 TBTF_{i,t} \times Risk_{i,t} \\ & \times post + \beta^5 Macro\ Controls_t + Issue\ FE + \varepsilon_{i,b,t} \end{aligned} \quad (6)$$

We use *size90* as our measure of systemic importance. We use a dummy variable, *post*, which equals one on the event date and the five subsequent trading days. We use issue fixed effects (*Issue FE*) and the regression corresponds to a difference-in-differences estimation. We examine the change in the TBTF subsidy after the event, as well as the change in risk sensitivity. These changes are captured by the coefficients on the  $TBTF_{i,t} \times post$ , and the  $TBTF_{i,t} \times Risk_{i,t} \times post$  variables, respectively.

As before, we introduce non-financial institutions as controls and examine changes in both the TBTF subsidy and risk sensitivity after the event with respect to those firms. Specifically, we run the following regression for a sample of firms that includes both financial institutions and non-financial institutions:

---

<sup>15</sup> The event dates are obtained from the St. Louis Fed: <https://www.stlouisfed.org/financial-crisis/full-timeline>.



$$\begin{aligned}
Spread_{i,b,t} = & \alpha + \beta^1 post + \beta^2 TBTF_{i,t} \times post + \beta^3 financial_{i,t} \times post + \beta^4 Risk_{i,t} \times post \\
& + \beta^5 TBTF_{i,t} \times financial_{i,t} \times post + \beta^6 TBTF_{i,t} \times Risk_{i,t} \times post \\
& + \beta^7 financial_{i,t} \times Risk_{i,t} \times post + \beta^8 TBTF_{i,t} \times financial_{i,t} \times Risk_{i,t} \\
& \times post + \beta^9 Macro Controls_t + Issue FE + \varepsilon_{i,b,t}
\end{aligned} \tag{7}$$

The coefficient on the  $TBTF_{i,t} \times financial_{i,t} \times post$  variable captures the impact of the event on spreads for large financial institutions compared to large non-financials. Similarly, the  $TBTF_{i,t} \times financial_{i,t} \times Risk_{i,t} \times post$  variable captures the effect of the event on the spread-risk relationship for large financials compared to large non-financials.

The results are in Table 7. For brevity, we report only variables discussed above. We find that announcements of government financial and liquidity support have been associated with a decrease in credit spreads for larger financial institutions. In particular, the bailout of Bear Stearns and the revised TARP bill passing the House of Representatives led to decreases in spreads in excess of 100 bps (column 1). Large financial institutions also saw a decrease in the risk sensitivity of their debt to changes in risk (column 2). We find similar results when we use non-financial institutions as controls. These triple-difference results are provided in columns 3 and 4.

Next, we examine a negative shock to investor expectations of government support, namely the bankruptcy filing by Lehman Brothers on September 15, 2008. Again, our variable of interest is the term interacting *post* with *size90*. The coefficient on the interaction term is significant and positive for the Lehman event (column 1 in Table 7). The result indicates that larger institutions saw greater increases in their credit spreads after the government allowed

Lehman to collapse.<sup>16</sup> The increase is economically significant at over 100 bps. In response to the Lehman collapse, large institutions also saw their credit spreads become significantly more sensitive to risk. The coefficient on the triple-interaction term is significant and negative (column 2), indicating an increase in risk sensitivity for large institutions following that event. The results are similar when we use non-financials as controls (columns 3 and 4).

These results indicate that market participants revised their expectations of government intervention during these events. By analyzing recent shocks to investor expectations of government assistance, we find additional evidence consistent with our main finding that credit markets price expectations of government support for large financial institutions.

We also examine two regulatory reforms that have been proposed to address problems associated with TBTF institutions. The first is the adoption of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank). One of the main purposes of the legislation was to end investors' expectations of future government bailouts. Table 7 shows results for June 29, 2010, the date the House and Senate conference committees issued a report reconciling the bills of the two chambers, and July 21, 2010 when President Barak Obama signed the bill into law. The coefficient on the term interacting *size90* and *post* for the first event is significant and negative. This indicates that Dodd-Frank actually lowered credit spreads for the very largest financial institutions relative to the others (although the 3 basis point effect is economically small). The coefficient on *size90*×*mertondd*×*post* is significant and positive, indicating that Dodd-Frank decreased the risk sensitivity of credit spreads for large institutions (although the effect again is economically very small). We find a small positive increase in spreads using the

---

<sup>16</sup> We recognize that, in addition to signaling a reduced likelihood of bailouts, Lehman's collapse might have exerted a more direct effect on financial institutions. Hence, we tried controlling for institutions' exposure to Lehman by including an indicator variable (*exposure*) that takes the value of one for an institution that declared direct exposure to Lehman in the weeks following its collapse, and zero otherwise (following Raddatz 2009). We obtained results similar to the reported results.

July 21, 2010 event date. As there has been uncertainty surrounding the information regarding Dodd-Frank and its implementation, we also employ a longer event window of 132 trading days (6 months). Results using this longer window are shown in Table BI of Appendix B. The relevant coefficients are largely insignificant statistically and economically. In all, these results indicate that Dodd-Frank has been insignificant in changing investors' expectations of future support for major financial institutions.

We also examine the FDIC's recently proposed Single Point of Entry (SPOE) strategy to implement its Orderly Liquidation Authority (OLA) set out in Title II of the Dodd-Frank Act. This authority provides the FDIC with the ability to resolve large financial firms when bankruptcy would have serious adverse effects on financial stability in the U.S. We use as the event date December 10, 2012, the day the FDIC released a white paper and a press release describing the SPOE strategy. We find an increase in credit spreads for large financial institutions in response to this event. The results continue to hold when we use non-financial institutions as controls. The reaction, however, has not been economically significant.

Despite Dodd-Frank's explicit no-bailout pledge, the Act leaves open many avenues for future TBTF rescues. For instance, the Federal Reserve can offer a broad-based lending facility to a group of financial institutions in order to provide a disguised bailout to the industry or a single firm. In addition, Congress can sidestep Dodd-Frank by amending or repealing it or by allowing regulators to interpret their authority in ways that protect creditors and support large financial institutions (see, e.g., Skeel 2010; Wilmarth 2011; Standard & Poor's 2011). And

although Dodd-Frank grants new authority to resolve large institutions, those decisions will involve political considerations.<sup>17</sup>

#### 4. FDIC Guarantee

In this subsection, we compare *implicitly* guaranteed bonds to *explicitly* guaranteed bonds issued by the same firm. To help restore confidence in financial institutions, the government issued a temporary explicit guarantee for certain new debt that financial institutions issued during the financial crisis. The FDIC's Temporary Liquidity Guarantee Program (TLG Program) provided a guarantee for senior unsecured debt issued after October 14, 2008 and before June 30, 2009 (later extended to October 31, 2009). The guarantee remained in effect until June 30, 2012 (or the date the debt matured, if earlier). The TLG Program was available to insured depository institutions and financial holding companies that opted to participate in the program.<sup>18</sup>

We examine the institutions in our data set that issued bonds under the FDIC's TLG Program and that also had similar bonds outstanding outside the TLG Program.<sup>19</sup> For a given firm, we look at the difference between spreads on bonds backed by the FDIC guarantee and spreads on bonds without the FDIC guarantee. This approach allows us to examine the effect of an implicit guarantee after controlling for time-varying firm effects. Figure 3 shows the

---

<sup>17</sup> Former President of the Federal Reserve Bank of Kansas City, Thomas Hoenig, noted: "The final decision on solvency is not market driven but rests with different regulatory agencies and finally with the Secretary of the Treasury, which will bring political considerations into what should be a financial determination."

<sup>18</sup> Not all the debt of these institutions was eligible to be guaranteed under the TLG Program. To be eligible, the debt had to be senior unsecured debt issued from October 2008 to October 2009. In addition, an institution could only issue new debt under the TLG Program in an amount up to 125% of its senior unsecured debt that was outstanding on September 30, 2008 and scheduled to mature on or before the October 31, 2009. The FDIC charged issuers a fee for the guarantee, and institutions could opt out of the program.

<sup>19</sup> The following companies in the TRACE/FISD databases issued bonds under the FDIC guarantee as well as non-guaranteed bonds: Bank of America, Citigroup, Goldman Sachs, JP Morgan Chase, Morgan Stanley, Sovereign Bancorp, State Street, Suntrust, US Bancorp, Wells Fargo, PNC Bank, HSBC USA, Keycorp, Metlife, John Deere Capital, and GE Capital.

difference in spreads for each of the top six financial institutions. Control variables are not used in Figure 3.

We introduce controls by regressing spreads on a dummy variable (*guarantee*) that takes a value of one if the bond is backed by the FDIC guarantee:

$$Spread_{i,b,t} = \alpha + \beta^1 Bond\ Controls_{i,b,t} + \beta^2 guarantee_{i,t-1} + Firm \times Trading\ Day\ FE + \varepsilon_{i,b,t} \quad (8)$$

To maximize sample size, we include all bonds issued by the firms covered under the TLG Program. We control for the age of the bond since issuance in years (*age*) and the time to maturity in years (*ttm*), and include dummies set to one if the bond is *puttable*, *redeemable*, *exchangeable*, or if the bond has fixed rate coupons (*fixrate*). We also include firm-trading day fixed effects (to examine within-company variation on a given trading day).<sup>20</sup> The results appear in Table BII of Appendix B.

Figure 4 displays the results of running the regressions in Table BII (column 4) on a daily basis. It shows how the value of the FDIC guarantee declined over the June 2009 to June 2011 period. In the middle of the time period (June 2010), Dodd-Frank was adopted. We do see a slight increase in the value of the FDIC guarantee in the months preceding Dodd-Frank's adoption. At that time, it was unclear what the final language of the legislation would be. After Dodd-Frank was finalized, however, the value of the FDIC guarantee resumed its downward

---

<sup>20</sup> Our sample includes bonds of all institutions that have issued both types of bonds. We address bonds with extreme yields by winsorizing at the 99<sup>th</sup> percentile values for guaranteed and non-guaranteed bonds. We eliminate extreme one-day moves (>30%) that reverse the next day. We also eliminate bond with maturities less than 90 days and greater than 30 years. If we do not observe both the guaranteed and non-guaranteed bonds trading on a given day for a given company, we delete all observations for that company on that day.

trend. Dodd-Frank does not appear to have changed investors' expectations of government support for the non-guaranteed bonds of major financial institutions.

We confirm our finding by conducting an event study around the adoption of Dodd-Frank. We run a regression similar to that in Table BII (column 4), but with an additional variable, *post*. *Post* is a dummy equal to one during the 5 trading days (or 132 trading days) following the adoption of Dodd-Frank. *post* is interacted with an indicator variable (*guarantee*) that equals one if a bond is guaranteed under the FDIC's TLG Program, and zero if it is not. This interaction term captures whether Dodd-Frank impacted investor expectations of support for non-guaranteed bonds relative to FDIC guaranteed bonds. The results appear in Table 8. The coefficient on the interaction term is significant and positive during the 10-trading day window (column 1). The result indicates that, after Dodd-Frank, spreads on bonds that lacked the FDIC guarantee decreased relative to spreads on bonds of the same firm that had the FDIC guarantee. In other words, Dodd-Frank lowered the spread differential between FDIC-guaranteed bonds and non-FDIC guaranteed bonds of the same firm. As investors viewed it, Dodd-Frank made a firm's *implicitly* guaranteed debt more like its *explicitly* guaranteed debt. While this effect may not be economically significant, and no statistically significant effect is detected using the 264-trading day window (column 3), we should observe a *significant negative effect* if Dodd-Frank had been successful in eliminating TBTF expectations.

In Table 8, we also examine Dodd-Frank's impact on the risk sensitivity of guaranteed and non-guaranteed bonds, which is captured by the triple-interaction term (*mertondd*×*guarantee*×*post*). For both the 10- and 264-trading day windows (columns 2 and 4), the coefficient is significant and negative, which indicates that the risk sensitivity of non-guaranteed debt declined following Dodd-Frank.

## 5. Impact of Liquidity and Alternative Measures of Systemic Importance

It is conceivable that our results might be affected by the liquidity of the bonds we study. In Table 9, we show that our main results from Table 2 are robust to controls for liquidity. Since we do not have all bond trades for the full sample period, we create a liquidity measure (*liquidity*) based on bond characteristics following Longstaff, Mithal and Neis (2005), which is described in Section III and in detail in Appendix A. We use the same specifications and controls used in Table 2. For brevity, we only report coefficients on the variables of interest. The results in column 1 of Table 9 show that the *size90* variable retains its significance when we control for liquidity.

For the time period starting in 2003 (for which we have all bond transactions), we create four liquidity measures (*amihud*, *roll*, *range* and *zeros*) and an aggregate measure (*lambda*) constructed by summing up the standardized values of these four liquidity measures. These liquidity variables are described in Section III and in detail in Appendix A. In columns 2 and 3, we use *lambda* as our liquidity control. The *size90* variable and the interaction of *size90* with *Risk* retain their economic and statistical significance in the presence of *lambda*.

In examining investor expectations of support, we have used a differences-in-differences approach using non-financials as a control. We now test to see if there are significant differences in the liquidity of bonds issued by financial and non-financial firms. We use the same specification and controls used in Table 2, but use the four measures of liquidity (*amihud*, *roll*, *range*, *zeros*) and the aggregate liquidity measure (*lambda*) as the dependent variable. The results are reported in Table 10. As expected, we find that the bonds of large financial institutions have significantly higher liquidity compared to their smaller counterparts (columns 1

to 5). When we examine the differences in liquidity of bonds between large financials and large non-financials, we do not find a significant difference. The coefficient on the interaction term,  $financial \times size90$ , lacks statistical and economic significance (columns 6 to 10), suggesting that our prior results are unlikely to be driven by differences in liquidity.

We also examine TBTF in relation to measures of systemic risk. As discussed in Section III, although systemic importance and size are likely to be highly related, there could be differences, such as in terms of political influence. In column 4 of Table 9, following Adrian and Brunnermeier (2011), we use an institution's contribution to systemic risk (*covar*) to identify systemically important financial institutions. Higher values of *covar* indicate greater systemic risk contribution. Results show a significant negative relationship between *covar* and *spread*. That is, the greater an institution's contribution to systemic risk, the lower its spread. The second systemic risk measure we use (*srisk*) is based on the expected capital shortfall framework developed by Acharya, Engle and Richardson (2012) and Acharya et al. (2010). Results in column 5 show a significant negative relationship between *srisk* and *spread*. The greater an institution's systemic risk, the lower its spread. In columns 6 and 7, we replicate the risk sensitivity analyses of Table 3, controlling for the two measures of systemic importance, and the results are similar. The risk sensitivity declines for the largest institutions. In addition, both the *covar* and *srisk* variables lose some of their economic and statistical significance after we control for large size.



## **VI. Conclusion**

We find that expectations of government support are embedded in the credit spreads of bonds issued by large U.S. financial institutions. Using bonds traded between 1990 and 2012, we find that credit spreads are risk sensitive for most financial institutions, while credit spreads lack risk sensitivity for the largest financial institutions. In other words, we find that bondholders of large financial institutions have an expectation that the government will shield them from losses in the event of failure and, as a result, they do not accurately price risk. This expectation of government support constitutes an implicit subsidy of large financial institutions, allowing them to borrow at subsidized rates. This relationship between firm size and risk-sensitivity of bond spreads is not seen in non-financial sectors and is robust to non-risk-related reasons for bond spreads being lower for the largest financial institutions, such as liquidity. We confirm the robustness of our results by conducting an event study examining shocks to investor expectations, examining explicitly and implicitly guaranteed bonds of the same firm, and using ratings of government support. We also show that recent financial regulations that seek to address too-big-to-fail have not had a significant impact in eliminating expectations of government support. In the post-crisis period after 2009, the implicit subsidy has remained at positive levels. We find that the passage of Dodd-Frank in the summer of 2010 did not significantly alter investors' expectations of government support.

## References

- Acharya, Viral, Robert Engle, and Matthew Richardson, (2012), “Capital Shortfall: A New Approach to Ranking and Regulating Systemic Risks,” *American Economic Review* 102, 59-64.
- Acharya, Viral, and Tanju Yorulmazer, (2007), “Too Many to Fail: An Analysis of Time-Inconsistency in Bank Closure Policies,” *Journal of Financial Intermediation* 16, 1-31.
- Adrian, Tobias, and Markus K. Brunnermeier, (2011), "CoVaR," Federal Reserve Bank of New York Staff Report 348.
- Amihud, Yakov, (2002), “Illiquidity and Stock Returns: Cross-Section and Time Series Effects,” *Journal of Financial Markets* 5, 31–56.
- Anginer, Deniz, and Asli Demirguc-Kunt, (2014), “Has the Global Banking System Become More Fragile Over Time?,” *Journal of Financial Stability* 13, 202-213.
- Anginer, Deniz, and A. Joseph Warburton, (2014), “The Chrysler Effect: The Impact of Government Intervention on Borrowing Costs,” *Journal of Banking and Finance* 40, 62-79.
- Anginer, Deniz, and Celim Yildizhan, (2010), “Is There a Distress Risk Anomaly? Corporate Bond Spread as a Proxy for Default Risk,” World Bank Policy Research Working Paper No. 5319.
- Atkeson, Andrew G., Andrea L. Eisfeldt, and Pierre-Olivier Weill, (2014), “Measuring the Financial Soundness of U.S. Firms, 1926-2012”, Working Paper.
- Balasubramnian, Bhanu, and Ken B. Cyree, (2011), “Market Discipline of Banks: Why are Yield Spreads on Bank-Issued Subordinated Notes and Debentures Not Sensitive to Bank Risks?,” *Journal of Banking & Finance* 35, 21-35.
- Bao, Jack, Jun Pan, and Jiang Wang, (2011), “The Illiquidity of Corporate Bonds,” *Journal of Finance* 66, 911–946.

Berger, Allen N., and David B. Humphrey, (1994), "Bank Scale Economies, Mergers, Concentration, and Efficiency: The U.S. Experience," Board of Governors of the Federal Reserve System Discussion Series 94-23.

Berger, Allen N., and Loretta J. Mester, (1997), "Inside the Black Box: What Explains Differences in the Efficiencies of Financial Institutions?," *Journal of Banking and Finance* 21, 895-947.

Bliss, Robert R., (2001), "Market Discipline and Subordinated Debt: A Review of Some Salient Issues," *Federal Reserve Bank of Chicago Economic Perspectives* 25, 24-45.

Bliss, Robert R., (2004), "Market Discipline: Players, Processes, and Purposes," in *Market Discipline Across Countries and Industries*, W. Hunter, G. Kaufman, C. Borio, and K. Tsatsaronis (eds.) (MIT Press, Boston), 37-53.

Bongini, Paola, Luc Laeven, and Giovanni Majnoni, (2002), "How Good is the Market at Assessing Bank Fragility? A Horse Race Between Different Indicators," *Journal of Banking & Finance* 26, 1011-1028.

Calomiris, Charles W., (1999), "Building an Incentive-Compatible Safety Net," *Journal of Banking & Finance* 23, 1499-1519.

Campbell, John Y., Jens Hilscher, and Jan Szilagyi, (2008), "In Search of Distress Risk," *Journal of Finance* 63, 2899-2939.

Campbell, John Y., and Glen B. Taksler, (2003), "Equity Volatility and Corporate Bond Yields," *Journal of Finance* 58, 2321-2350.

Crotty, Kevin, (2013), "Corporate Yield Spreads and Systematic Liquidity," Rice Univ. Working Paper.

Demirguc-Kunt, Asli, and Harry Huizinga, (2011), "Do We Need Big Banks? Evidence on Performance, Strategy and Market Discipline," World Bank Policy Research Paper Number 5576.

Demsetz, Rebecca S., and Philip E. Strahan, (1997), "Diversification, Size, and Risk at Bank Holding Companies," *Journal of Money, Credit and Banking* 29, 300-313.

DeYoung, Robert, Mark J. Flannery, William Lang, and Sorin M. Sorescu, (2001), "The Information Content of Bank Exam Ratings and Subordinated Debt Prices," *Journal of Money, Credit and Banking* 33, 900-925.

Dick-Nielsen, Jens, Peter Feldhutter, and David Lando, (2012), "Corporate Bond Liquidity Before and After the Onset of the Subprime Crisis," *Journal of Financial Economics* 103, 471-492.

Duan, Jin-Chuan, Arthur F. Moreau, and C.W. Sealey, (1992), "Fixed-Rate Deposit Insurance and Risk-Shifting Behavior at Commercial Banks," *Journal of Banking and Finance* 16, 715-742.

Flannery, Mark J., (1998), "Using Market Information in Prudential Bank Supervision: A Review of the U.S. Empirical Evidence," *Journal of Money, Credit and Banking* 30, 273-305.

Flannery, Mark J., and Sorin M. Sorescu, (1996), "Evidence of Bank Market Discipline in Subordinated Debenture Yields: 1983-1991," *Journal of Finance* 51, 1347-77.

Freixas, Xavier, (1999), "Optimal Bail-Out, Conditionality and Creative Ambiguity," CEPR Discussion Paper 2238.

Gopalan, Radhakrishnan, Fenghua Song, and Vijay Yerramilli, (2012), "Debt Maturity Structure and Credit Quality," *Journal of Financial and Quantitative Analysis*, forthcoming.

Hillegeist, Stephen A., Elizabeth K. Keating, Donald Cram, and Kyle Lundstedt, (2004), "Assessing the Probability of Bankruptcy," *Review of Accounting Studies* 9, 5-34.

Hovakimian, Armen, and Edward J. Kane, (2000), "Effectiveness of Capital Regulation at U.S. Commercial Banks, 1985-1994," *Journal of Finance* 55, 451-468.

Hughes, Joseph P., and Loretta J. Mester, (2011), "Who Said Large Banks Don't Experience Scale Economies? Evidence From a Risk-Return-Driven Cost Function," Federal Reserve Bank of Philadelphia Working Paper.

Jacowitz, Stefan, and Jonathan Pogach, (2013), "Deposit Rate Advantages at the Largest Banks," FDIC Working Paper.

Jagtiani, Julapa, George Kaufman, and Catharine Lemieux, (2002), "The Effect of Credit Risk on Bank and Bank Holding Company Bond Yields: Evidence from the Post-FDICIA Period," *Journal of Financial Research* 25, 559-575.

Jirnyi, Andrei, (2010), "Range-Based Proxies for Liquidity and Order Imbalance," Northwestern U. Working Paper.

Johnson, Simon, and James Kwak, (2010), *13 Bankers: The Wall Street Takeover and the Next Financial Meltdown* (New York: Random House, Pantheon Books).

Kelly, Bryan, Hanno Lustig, and Stijn van Nieuwerburgh, (2012), "Too-Systemic-To-Fail: What Option Markets Imply About Sector-wide Government Guarantees," Centre for Economic Policy Research Working Paper.

Kroszner, Randall S., (2013), "A Review of Bank Funding Cost Differentials," University of Chicago Booth School of Business Working Paper.

Laeven, Luc, and Ross Levine, (2007), "Is There a Diversification Discount in Financial Conglomerates?," *Journal of Financial Economics* 85, 331-367.

Laeven, Luc, and Fabian Valencia, (2010), "Resolution of Banking Crises: the Good, the Bad, and the Ugly," IMF Working Paper No. 146.

Levonian, Mark, (2000), "Subordinated Debt and Quality of Market Discipline in Banking," Federal Reserve Bank of San Francisco.

Longerstaey, J., P. Zangari, C. Finger, and S. Howard, (1996), *RiskMetrics—Technical Document* (JP Morgan, NY).

Longstaff, F., S. Mithal, and E. Neis, (2005), "Corporate Yield Spreads: Default Risk or Liquidity? New Evidence from the Credit–Default Swap Market," *Journal of Finance* 60, 2213–2253.

McAllister, Patrick H., and Douglas McManus, (1993), "Resolving the Scale Efficiency Puzzle in Banking," *Journal of Banking and Finance* 17, 389-405.

Merton, Robert C., (1974), "On the Pricing of Corporate Debt: The Risk Structure of Interest Rates," *The Journal of Finance* 29, 449-470.

Merton, Robert C., (1977), "On the Pricing of Contingent Claims and the Modigliani-Miller Theorem," *Journal of Financial Economics* 15, 241-249.

Mishkin, Frederic S., (1999), "Financial Consolidation: Dangers and Opportunities," *Journal of Banking and Finance* 23, 675-691.

Morgan, Donald P., and Kevin J. Stiroh, (2000), "Bond Market Discipline of Banks," *Federal Reserve Bank of Chicago Proceedings*, 494-526.

Morgan, Donald P., and Kevin J. Stiroh, (2005), "Too Big To Fail After All These Years," *Federal Reserve Bank of New York Staff Report No. 220*.

Raddatz, Claudio, (2010), "When the Rivers Run Dry: Liquidity and the Use of Wholesale Funds in the Transmission of the U.S. Subprime Crisis," *World Bank Policy Research Paper* 5203.

Rajan, Raghuram G, (2010), "Too Systemic to Fail: Consequences, Causes and Potential Remedies," *Bank for International Settlements Working Paper No 305*.

Rime, B., (2005), "Do 'Too Big To Fail' Expectations Boost Large Banks Issuer Ratings?," *Swiss National Bank*.

Roll, R, (1984), "A Simple Measure of the Bid-Ask Spread in an Efficient Market," *Journal of Finance* 39, 1127-1140.

Roy, Arthur D., (1952), "Safety First and the Holding of Assets," *Econometrica* 20, 431-449.

Sironi, Andrea, (2003), "Testing for Market Discipline in the European Banking Industry: Evidence from Subordinated Debt Issues," *Journal of Money, Credit and Banking* 35, 443-472.

Skeel, David, (2010), *The New Financial Deal: Understanding the Dodd-Frank Act and Its (Unintended) Consequences* (Hoboken, N.J.: John Wiley).

Standard & Poor's, (2011), "The U.S. Government Says Support for Banks Will Be Different 'Next Time' – But Will It?," (July 12).

Strahan, Philip, (2013), "Too Big To Fail: Causes, Consequences, and Policy Responses," *Annual Review of Financial Economics* 5, 43-61.

Ueda, Kenichi, and Beatrice Weder di Mauro, (2012), "Quantifying Structural Subsidy Values for Systemically Important Financial Institutions," IMF Working Paper No. 12/128.

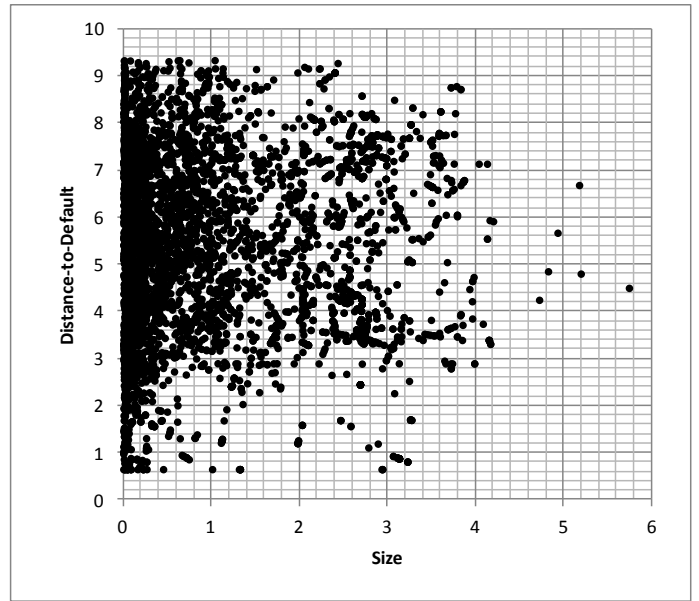
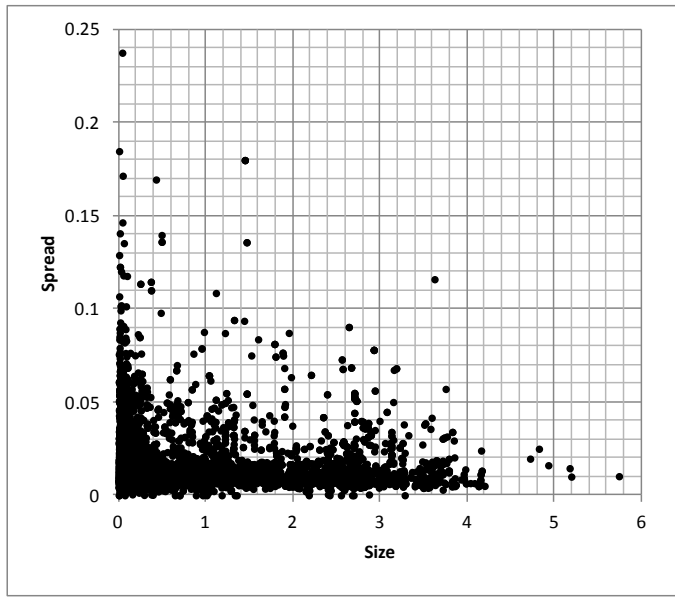
Veronesi, Pietro, and Luigi Zingales, (2010), "Paulson's Gift," *Journal of Financial Economics* 97, 339-368.

Wheelock, David C., and Paul W. Wilson, (2001), "New Evidence on Returns to Scale and Product Mix among U.S. Commercial Banks," *Journal of Monetary Economics* 47, 653–674.

Wilmarth, Arthur E., (2011), "The Dodd-Frank Act: A Flawed and Inadequate Response to the Too-Big-to-Fail Problem," *Oregon Law Review* 89, 951-1057.

**Figure 1: Size, Spreads and Risk**

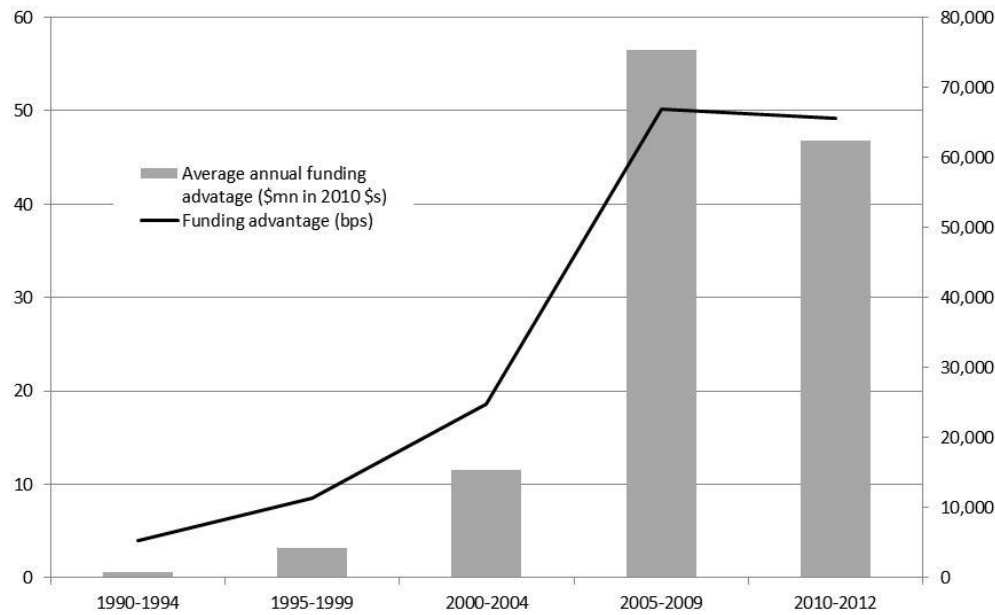
The figure on the left shows the relationship between the size of a financial institution and the credit spread on its bonds. Size (x-axis) is the relative size of a financial institution, computed as size (log of assets) in a given year divided by the average size of all financial institutions in that year. Spread (y-axis) is the difference between the yield on a financial institution's bond and that on a corresponding maturity-matched Treasury bond. The figure on the right shows the relationship between the size of a financial institution and its risk. Size (x-axis) is the relative size of a financial institution, computed as its size (log of assets) in a year divided by the average size of all financial institutions in that year. Risk (y-axis) is the average distance-to-default of a financial institution in a given year, computed as described in Appendix A.





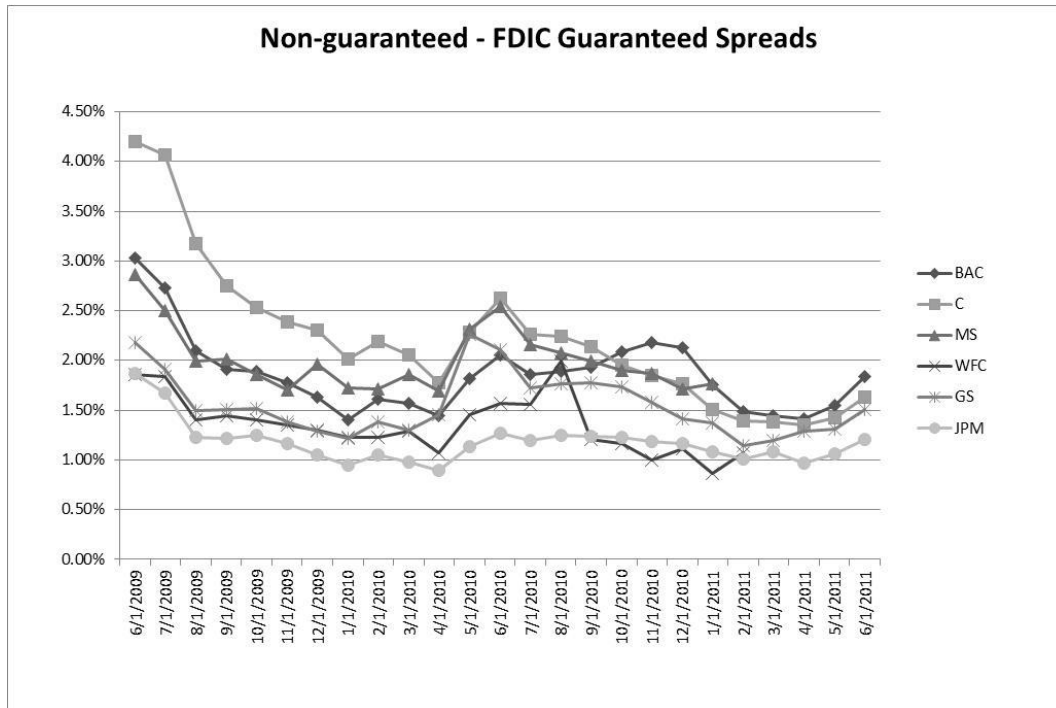
## Figure 2: Value of the Implicit Subsidy over Time

This figure shows the annual subsidy to large financial institutions due to the implicit government guarantee. To compute the annual subsidy, we run the following regression for each five year interval from 1990 to 2010 and the three year interval for the 2010-2012 time period:  $Spread_{i,b,t} = \alpha + \beta^1 size90_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + \varepsilon_{i,b,t}$ . The bond, firm, and macro controls are defined in Table 1 and in Appendix A. We use *mertondd* as the risk measure. The coefficient on *size90* represents the subsidy accruing to large financial institutions for the corresponding time period. We also quantify the dollar value of the subsidy. We multiply the reduction in funding costs over a given time period by the average total uninsured liabilities (in US\$ millions) to arrive at the annualized dollar value of the subsidy (y-axis) over the same time period. The dollar amounts are adjusted for inflation and are in constant 2010 dollars.



### Figure 3: Explicit and Implicit Guarantee Spread Difference

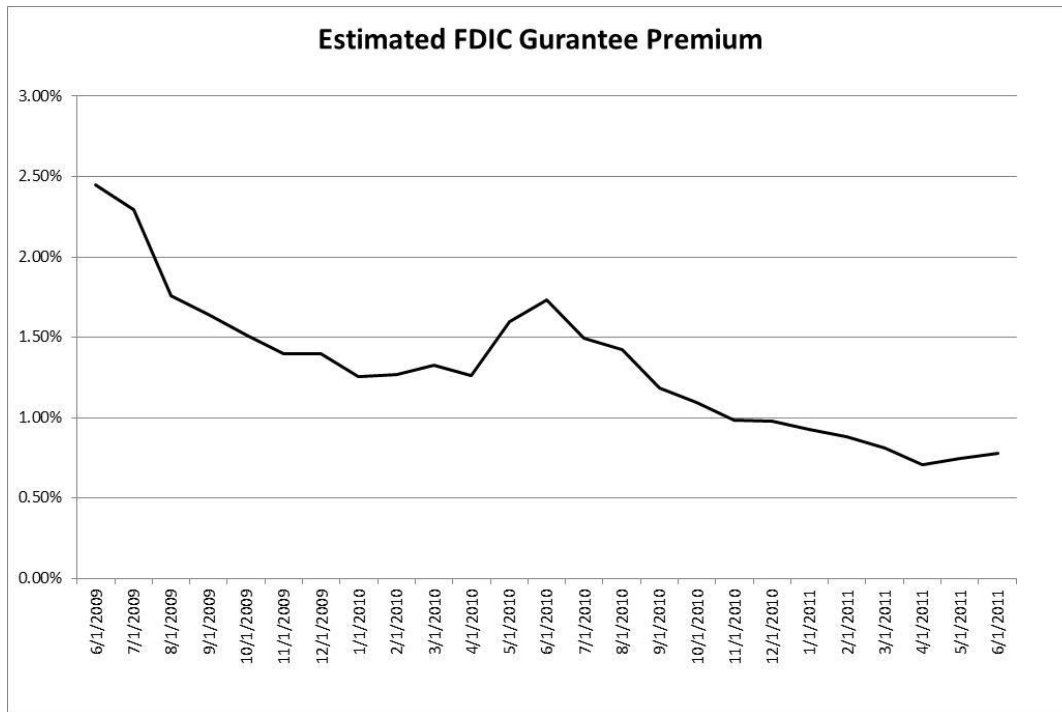
This figure shows the difference in spreads between FDIC guaranteed and non-guaranteed bonds for six financial institutions. *BAC* is Bank of America, *C* is Citibank, *MS* is Morgan Stanley, *WFC* is Wells Fargo, *GS* is Goldman Sachs, and *JPM* is JP Morgan Chase. We plot averages for each month for each company if there are more than 10 daily trading observations.



#### Figure 4: Explicit Guarantee Premium

This figure shows the estimated FDIC guarantee premium. To compute the premium, we run the following regression each day:  $Spread_{i,b,t} = \alpha + \beta^1 seniority_{i,b,t} + \beta^2 ttm_{i,b,t} + \beta^3 fixed\ rate_{i,b,t} + \beta^4 puttable_{i,b,t} + \beta^5 exchangeable_{i,b,t} + \beta^6 redeemable_{i,b,t} + \beta^7 guarantee_{i,b,t} + Firm\ FE + \varepsilon_{i,b,t}$

The sample includes financial institutions that issued bonds under the FDIC's Temporary Liquidity Guarantee Program. *guarantee* is a dummy variable set equal to 1 if the bond had a special FDIC guarantee and was issued as part of the Temporary Liquidity Guarantee Program. *age* is the age of the bond since issuance in years. *ttm* is time to maturity of the bond in years. *puttable* is a dummy variable set equal to 1 if the bond is puttable. *redeemable* is a dummy variable set equal to 1 if the bond is redeemable. *exchangeable* is a dummy variable set equal to 1 if the bond is exchangeable. *fixrate* is a dummy variable set equal to 1 if the bond has fixed rate coupons. Regression includes firm fixed effects (Firm FE). We run the regression daily and then average the coefficient on the *guarantee* variable each week. When plotting we invert the guarantee variable so that reduction corresponds to a positive premium.



**Table 1: Summary Statistics**

This table presents summary statistics for the variables; Panel A for financial firms and Panel B for non-financial firms. *ttm* is years to maturity for a bond. *seniority* is a dummy variable indicating whether the bond is senior. *spread* is the difference between the yield on a given firm's bond and the yield on a maturity-matched Treasury bond. *spread* is in percentages. *size* is the size of an institution defined as the log value of total assets. *roa* is the return on assets, measured as net income divided by total assets. *mismatch* measures maturity mismatch and is computed as short-term debt minus cash divided by total liabilities. *leverage* is total liabilities divided by total assets. *mb* is the market-to-book ratio computed as the value of total equity divided by book value of total equity. *mertondd* is Merton's (1974) distance-to-default measure, calculated using firm-level financial and stock return data, described in Appendix A. *z-score* is a financial distress measure calculated as the sum of *roa* and equity ratio (ratio of book equity to total assets), averaged over four years, divided by the standard deviation of *roa* over four years. *volatility* is stock return volatility computed using daily returns over the past 12 months. In calculating *volatility*, we require the company to have at least 90 non-zero and non-missing returns over the previous 12 months. Variables are defined in Appendix A.

Panel A: Financial Firms						
Variables	N	Mean	Std Dev	P25	P50	P75
ttm	45616	6.960	5.876	3.056	5.375	8.747
seniority	45616	0.695	0.460	0.000	1.000	1.000
spread	45616	2.371	11.221	0.703	1.019	1.776
size	45616	11.459	1.693	10.405	11.430	12.636
roa	45616	0.012	0.025	0.005	0.010	0.014
mismatch	45207	0.068	0.182	-0.031	0.046	0.151
leverage	45616	0.896	0.092	0.895	0.919	0.943
mb	45542	1.632	0.892	1.093	1.450	1.969
mertondd	45616	5.278	1.999	3.976	5.601	6.839
zscore	43869	37.267	40.670	13.901	24.975	46.487
volatility	45616	0.365	0.248	0.211	0.280	0.397
Panel B: Non-Financial Firms						
Variables	N	Mean	Std Dev	P25	P50	P75
ttm	78698	11.106	10.747	4.061	7.817	15.733
seniority	78698	0.975	0.155	1.000	1.000	1.000
spread	78698	2.072	4.441	0.674	0.998	1.760
size	78469	9.294	1.296	8.379	9.328	10.126
roa	78469	0.043	0.064	0.016	0.043	0.074
mismatch	78462	0.012	0.169	-0.056	0.001	0.071
leverage	78465	0.660	0.137	0.568	0.652	0.744
mb	78084	3.005	12.310	1.290	1.987	3.243
mertondd	78698	5.929	2.204	4.405	5.835	7.366
zscore	77097	29.524	40.890	10.172	18.549	35.816
volatility	78698	0.321	0.143	0.226	0.279	0.359

**Table 2: TBTF-Spread Regressions**

Regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Financial_{i,t-1} + \beta^3 Risk_{i,t-1} + \beta^4 TBTF_{i,t-1} \times Financial_{i,t-1} + \beta^5 Bond\ Controls_{i,b,t} + \beta^6 Firm\ Controls_{i,t-1} + \beta^7 Macro\ Controls_t + Firm\ FE + Year\ FE + \varepsilon_{i,b,t}$  are reported in this table. We measure the systemic importance (TBTF) of an institution using a number of different proxies. *size* is log value of total assets of a financial institution. *size90* is a dummy variable equal to one if a given financial institution's size is in the top 90<sup>th</sup> percentile. *size\_top\_10* is a dummy variable equal to one if a given financial institution is ranked in the top ten in terms of size in a given year. *bank*, *insurance* and *broker* dummies are variables set to one if the firm belongs to the corresponding industry based on its SIC code. *financial* is a dummy variable set to one if the firm is a financial firm (SIC code starting with 6). *mkt* is the market risk premium, computed as the value-weighted stock market return minus the risk-free rate. *term* is the term structure premium, measured by the yield spread between long-term (10-year) Treasury bonds and short-term (three-month) Treasuries. *def* is the default risk premium, measured by the yield spread between BAA-rated and AAA-rated corporate bonds. Other control variables are defined in Table 1 and Appendix A. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

VARIABLES	(1) spread	(2) spread	(3) spread	(4) spread	(5) spread	(6) spread
ttn	0.018** (0.007)	0.007 (0.004)	0.020*** (0.008)	0.020*** (0.008)	0.020*** (0.008)	0.014*** (0.003)
seniority	-0.128 (0.127)	-0.170** (0.082)	-0.121 (0.132)	-0.123 (0.132)	-0.154 (0.154)	-0.034 (0.105)
leverage <sub>t-1</sub>	-0.230 (0.870)	5.533*** (1.906)	-2.138*** (0.687)	-2.137*** (0.686)	-2.114*** (0.667)	0.855 (0.597)
roa <sub>t-1</sub>	-5.839 (4.037)	-2.579* (1.356)	-6.350 (4.256)	-6.362 (4.264)	-6.370 (4.243)	-3.404*** (0.811)
mb <sub>t-1</sub>	-0.176** (0.082)	-0.149*** (0.044)	-0.140* (0.083)	-0.139* (0.083)	-0.148* (0.087)	0.000 (0.001)
mismatch <sub>t-1</sub>	0.076 (0.319)	-0.996*** (0.362)	0.035 (0.318)	0.031 (0.319)	-0.087 (0.313)	-0.723*** (0.238)
def	1.560*** (0.200)	1.595*** (0.080)	1.540*** (0.197)	1.540*** (0.198)	1.542*** (0.195)	1.292*** (0.116)
term	0.057 (0.047)	0.078*** (0.023)	0.055 (0.046)	0.056 (0.047)	0.054 (0.045)	0.012 (0.023)
mkt	-0.653 (0.516)	-0.691*** (0.211)	-0.639 (0.513)	-0.645 (0.516)	-0.640 (0.513)	-0.440** (0.222)
mertondd <sub>t-1</sub>	-0.291*** (0.050)	-0.208*** (0.020)	-0.310*** (0.054)	-0.311*** (0.055)	-0.308*** (0.056)	-0.254*** (0.030)
size <sub>t-1</sub>	-0.246*** (0.065)	-0.191** (0.084)				
size90 <sub>t-1</sub>			-0.320** (0.148)			0.019 (0.120)
size_top_10 <sub>t-1</sub>				-0.331** (0.148)		
size <sub>t-1</sub> × bank dummy					-0.382** (0.183)	
size <sub>t-1</sub> × insurance dummy					-0.296 (0.334)	
size <sub>t-1</sub> × broker dummy					-0.196 (0.209)	
financial <sub>t-1</sub>						-0.284** (0.181)
size90 <sub>t-1</sub> × financial <sub>t-1</sub>						-0.241** (0.128)
constant	4.827*** (1.038)	-1.238 (1.613)	4.075*** (1.032)	4.121*** (1.033)	4.116*** (1.043)	0.192 (0.619)
Firm FE	N	Y	N	N	N	N
Year FE	Y	Y	Y	Y	Y	Y
Rating Dummies	Y	Y	Y	Y	Y	Y
Observations	39,164	39,125	39,164	39,164	39,164	104,127
R <sup>2</sup>	0.432	0.509	0.423	0.423	0.423	0.439

**Table 3: TBTF and Risk Interactions**

Regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 TBTF_{i,t-1} \times Risk_{i,t-1} + \beta^4 Bond\ Controls_{i,b,t} + \beta^5 Firm\ Controls_{i,t-1} + \beta^6 Macro\ Controls_t + Firm\ FE + Year\ FE + \varepsilon_{i,b,t}$  are reported in Panel A. We measure the systemic importance (TBTF) of an institution using the *size90* dummy variable, set equal to one if a given financial institution's size is in the top 90<sup>th</sup> percentile. In column 7, we also include interactions for two other size dummy variables: *size60* is a dummy variable equal to one if a given financial institution's size is between the 60<sup>th</sup> and 90<sup>th</sup> percentiles. *size30* is a dummy variable equal to one if a given financial institution's size is between the 30<sup>th</sup> and 60<sup>th</sup> percentiles. *Risk* of a financial institution is measured by distance-to-default (*mertondd*) in columns 1 and 7, z-score (*zscore*) in column 2, volatility (*volatility*) in column 3, the adjusted distance-to-default measure (*adj-mertondd*) in column 4, the distance-to-default measure computed using exponentially weighted moving average standard deviations (*ewma-mertondd*) in column 5, and credit risk beta (*dd-beta*) in column 6. *adj-mertondd* is the Merton's distance-to-default measure, calculated by removing the effect of size on market leverage and volatility as described in the text. *ewma-mertondd* is the Merton's distance-to-default measure, calculated using standard deviations computed using the exponentially weighted moving average method as described in the text. *dd-beta* is the Beta obtained from regressing a firm's monthly changes of distance-to-default on the monthly changes of value-weighted average distance-to-default of all other firms using 36 months of data. In computing *dd-beta*, we require the company to have at least 24 non-missing monthly changes in distance-to-default over the previous 36 months. *mertondd*, *zscore*, *volatility*, and the other control variables are defined in Table 1. For brevity, we do not report coefficients on the control variables in Panel A. Panel B reports regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 TBTF_{i,t-1} \times Risk_{i,t-1} + \beta^4 Financial_i + \beta^5 Financial_i \times TBTF_{i,t-1} + \beta^6 Financial_i \times Risk_{i,t-1} + \beta^7 Financial_i \times Risk_{i,t-1} \times TBTF_{i,t-1} + \beta^8 Bond\ Controls_{i,b,t} + \beta^9 Firm\ Controls_{i,t-1} + \beta^{10} Macro\ Controls_t + Firm\ FE + Year\ FE + \varepsilon_{i,b,t}$ . *Risk* and *TBTF* variables are the same as in Panel A. *financial* is a dummy variable set to one if the firm is a financial firm (SIC code starting with 6). For brevity, we do not report coefficients on the control variables in Panel B. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

PANEL A

VARIABLES	(1) mertondd	(2) zscore	(3) volatility	(4) adj-mertondd	(5) ewma-mertondd	(6) dd-beta	(7) mertondd
size90 <sub>t-1</sub>	-2.022*** (0.568)	-1.305*** (0.401)	0.876*** (0.256)	-1.819** (0.896)	-1.211*** (0.384)	-0.172* (0.091)	-2.846*** (0.629)
risk_measure <sub>t-1</sub>	-0.446*** (0.082)	-0.336*** (0.082)	4.885*** (1.106)	-0.467*** (0.112)	-0.097*** (0.021)	0.142* (0.076)	-0.524*** (0.092)
size90 <sub>t-1</sub> × risk_measure <sub>t-1</sub>	0.332*** (0.091)	0.266** (0.115)	-3.342*** (0.824)	0.399** (0.187)	0.104*** (0.034)	-0.295** (0.131)	0.418*** (0.096)
size60 <sub>t-1</sub>							-1.186 (0.926)
size60 <sub>t-1</sub> × risk_measure <sub>t-1</sub>							0.078 (0.109)
Year FE	Y	Y	Y	Y	Y	Y	Y
Rating Dummies	Y	Y	Y	Y	Y	Y	Y
Controls	Y	Y	Y	Y	Y	Y	Y
Observations	39,125	37,856	39,125	39,125	39,125	38,344	39,125
R <sup>2</sup>	0.457	0.429	0.492	0.326	0.425	0.438	0.465

PANEL B

VARIABLES	(1) mertondd	(2) zscore	(3) volatility	(4) adj-mertondd	(5) ewma-mertondd	(6) dd-beta
size90 <sub>t-1</sub>	-0.435 (0.442)	0.226 (0.398)	0.055 (0.301)	-0.575 (0.423)	-0.390 (0.280)	-0.211 (0.210)
financial <sub>t-1</sub>	0.482 (0.598)	0.162 (0.407)	0.558* (0.313)	0.268 (0.586)	0.011 (0.391)	-0.540** (0.228)
financial <sub>t-1</sub> × size90 <sub>t-1</sub>	-1.554** (0.746)	-1.445** (0.579)	0.721* (0.377)	-1.225* (0.725)	-0.739 (0.476)	0.092 (0.241)
risk_measure <sub>t-1</sub>	-0.241*** (0.046)	-0.172** (0.070)	8.170*** (0.824)	-0.224*** (0.048)	-0.065*** (0.016)	-0.080 (0.072)
size90 <sub>t-1</sub> × risk_measure <sub>t-1</sub>	0.071 (0.063)	-0.112 (0.125)	-0.175 (1.018)	0.092 (0.062)	0.038 (0.025)	0.141 (0.162)
financial <sub>t-1</sub> × risk_measure <sub>t-1</sub>	-0.149 (0.091)	-0.134 (0.101)	-2.740*** (1.057)	-0.130 (0.091)	-0.040 (0.032)	0.284** (0.114)
financial <sub>t-1</sub> × risk_measure <sub>t-1</sub> × size90 <sub>t-1</sub>	0.259** (0.113)	0.387** (0.171)	-3.106** (1.310)	0.219* (0.114)	0.069* (0.042)	-0.428* (0.225)
Year FE	Y	Y	Y	Y	Y	Y
Rating Dummies	Y	Y	Y	Y	Y	Y
Controls	Y	Y	Y	Y	Y	Y
Observations	104,127	101,944	104,127	104,127	104,127	103,796
R <sup>2</sup>	0.459	0.439	0.548	0.454	0.441	0.435

**Table 4: TBTF and Risk-Shifting**

Columns 1-4 report regressions results for the model  $\Delta D/V_{i,t} = \alpha + \beta^1 \Delta s_{A_{i,t}} + \beta^2 TBTF_{i,t} + \beta^3 TBTF_{i,t} \times \Delta s_{A_{i,t}} + Year\ FE + \varepsilon_{i,t}$ . We measure the systemic importance (*TBTF*) of an institution using log value of total assets (*size*), and the *size90* dummy variable set equal to one if a given financial institution's size is in the top 90<sup>th</sup> percentile.  $\Delta D/V$  is the annual change in the book value of debt divided by the market value of assets computed from the Merton model described in Appendix A.  $\Delta asset\ vol$  is the annual change in the volatility of market value of assets computed using the Merton model described in Appendix A. *financial* is a dummy variable set to one if the firm is a financial firm (SIC code starting with 6). Columns 5-8 report regressions results for the model,  $\Delta IPP_{i,t} = \alpha + \beta^1 \Delta s_{A_{i,t}} + \beta^2 TBTF_{i,t} + \beta^3 TBTF_{i,t} \times \Delta s_{A_{i,t}} + Year\ FE + \varepsilon_{i,t}$ .  $\Delta IPP$  is the fair insurance premium per dollar of liabilities computed following Merton (1977). The estimation is described in Appendix A. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

VARIABLES	(1) $\Delta D/V$	(2) $\Delta D/V$	(3) $\Delta D/V$	(4) $\Delta D/V$	(5) $\Delta IPP$	(6) $\Delta IPP$	(7) $\Delta IPP$	(8) $\Delta IPP$
$\Delta asset\ vol$	-0.183*** (0.070)	-1.075*** (0.318)	-0.207*** (0.074)	-0.445*** (0.028)	0.191*** (0.016)	-0.424*** (0.072)	0.155*** (0.017)	0.098*** (0.009)
$size_{t-1}$		0.000 (0.001)				-0.001 (0.001)		
$\Delta asset\ vol \times size_{t-1}$		0.096*** (0.031)				0.066*** (0.007)		
$size90_{t-1}$			-0.000 (0.003)	0.005* (0.003)			-0.003 (0.003)	-0.000 (0.000)
$\Delta asset\ vol \times size90_{t-1}$			0.308** (0.148)	0.252*** (0.089)			0.458*** (0.060)	-0.006 (0.040)
$financial_{t-1}$				-0.003* (0.002)				0.003*** (0.001)
$financial_{t-1} \times \Delta asset\ vol$				0.237*** (0.079)				0.057 (0.041)
$financial_{t-1} \times size90_{t-1}$				-0.005 (0.004)				-0.003 (0.003)
$financial_{t-1} \times size90_{t-1} \times \Delta asset\ vol$				0.057 (0.173)				0.464* (0.275)
Constant	0.003* (0.002)	0.001 (0.011)	0.003 (0.002)	0.006*** (0.001)	0.004*** (0.001)	0.010* (0.005)	0.004*** (0.001)	0.001*** (0.000)
Year FE	Y	Y	Y	Y	Y	Y	Y	Y
Observations	2,131	2,131	2,131	12,817	2,131	2,131	2,131	12,817
R <sup>2</sup>	0.018	0.041	0.022	0.083	0.060	0.095	0.086	0.078



**Table 5: TBTF-Risk Relationship**

Regression results for the model  $mertondd_{i,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Financial_{i,t-1} + \beta^3 TBTF_{i,t-1} \times Financial_{i,t-1} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + Year\ FE + \varepsilon_{i,b,t}$  are reported in this table.  $mertondd$  is the Merton (1974) distance-to-default measure, calculated using firm-level financial and stock return data, as described in Appendix A. We measure the systemic importance ( $TBTF$ ) of an institution using log value of total assets ( $size$ ), and the  $size90$  dummy variable set equal to one if a given financial institution's size is in the top 90<sup>th</sup> percentile.  $financial$  is a dummy variable set to one if the firm is a financial firm (SIC code starting with 6).  $std\ roa$  is the standard deviation of  $roa$  computed over the past five years. Other control variables are defined in Tables 1 and 2 and in Appendix A. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

VARIABLES	(1)	(2)	(3)	(4)
	mertondd	mertondd	mertondd	mertondd
def	-89.333*** (6.431)	-86.078*** (6.195)	-91.350*** (2.203)	-90.576*** (2.325)
term	-12.792*** (3.033)	-12.971*** (3.076)	-0.092 (1.294)	0.329 (1.333)
mkt	-0.098 (0.155)	-0.111 (0.156)	0.165*** (0.058)	0.120** (0.060)
roa <sub>t-1</sub>	6.268*** (1.241)	6.324*** (1.053)	8.187*** (0.678)	9.083*** (0.714)
mb <sub>t-1</sub>	0.088** (0.038)	0.066 (0.040)	0.008** (0.003)	0.007** (0.003)
std roa <sub>t-1</sub>	-9.368** (4.466)	-11.392** (5.725)	-3.410*** (0.847)	-4.812*** (0.999)
leverage <sub>t-1</sub>	-2.676*** (0.560)	-1.427** (0.599)	-3.295*** (0.305)	-3.100*** (0.311)
mismatch <sub>t-1</sub>	-0.593** (0.281)	-0.606* (0.324)	-0.098 (0.132)	0.025 (0.145)
size <sub>t-1</sub>	0.222*** (0.047)		0.508*** (0.031)	
size90 <sub>t-1</sub>		0.066 (0.154)		1.021*** (0.133)
financial <sub>t-1</sub>			2.247*** (0.515)	0.543*** (0.123)
financial <sub>t-1</sub> × size <sub>t-1</sub>			-0.257*** (0.052)	
financial <sub>t-1</sub> × size90 <sub>t-1</sub>				-0.482** (0.219)
Constant	6.604*** (0.659)	7.706*** (0.606)	3.409*** (0.346)	7.632*** (0.233)
Year FE	Y	Y	Y	Y
Rating Dummies	Y	Y	Y	Y
Observations	10,762	10,762	88,213	88,182
R <sup>2</sup>	0.627	0.605	0.522	0.465

**Table 6: Ratings as an Exogenous Measure**

Panel A reports regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 issuer\ rating_{i,t-1} + \beta^2 stand\ alone\ rating_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + Firm\ FE + Year\ FE + \varepsilon_{i,b,t}$ . Panel B reports regression results for the model  $issuer/stand\ alone\ rating_{i,t-1} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Firm\ Controls_{i,t-1} + Firm\ FE + Year\ FE + \varepsilon_{i,b,t}$ . *issuer rating* is the Fitch long-term issuer rating, which is a number between 1 and 9, with 1 indicating the highest issuer quality. *stand-alone rating* is the Fitch individual company rating which excludes any potential government support. It takes on a number between 1 and 9, with 1 indicating the highest issuer quality. Control variables are described in Tables 1 and 2, and in Appendix A. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

Panel A

VARIABLES	(1) spread	(2) spread	(3) spread
ttm	-0.021** (0.010)	-0.014 (0.021)	-0.011 (0.020)
seniority	-0.271** (0.105)	-0.212 (0.216)	-0.208 (0.216)
leverage <sub>t-1</sub>	-14.418*** (1.997)	-5.450 (3.829)	-4.093 (4.288)
roa <sub>t-1</sub>	-55.024*** (10.843)	-42.518*** (11.292)	-46.346*** (11.410)
mb <sub>t-1</sub>	0.419*** (0.105)	0.526*** (0.161)	0.465*** (0.164)
mismatch <sub>t-1</sub>	2.971*** (0.423)	2.492** (1.110)	2.385** (1.097)
def	1.344*** (0.106)	1.309*** (0.181)	1.298*** (0.178)
term	0.031 (0.038)	0.048 (0.054)	0.044 (0.055)
mkt	-0.555 (0.369)	-0.572 (0.439)	-0.528 (0.427)
mertondd <sub>t-1</sub>	-0.171*** (0.040)	-0.155*** (0.046)	-0.178*** (0.059)
stand-alone rating <sub>t-1</sub>	0.107* (0.055)		-0.164 (0.147)
issuer rating <sub>t-1</sub>		0.271*** (0.071)	0.340*** (0.107)
Constant	14.591*** (2.012)	4.759 (3.812)	3.335 (4.143)
Year FE	Y	Y	Y
Observations	16,127	16,120	16,107
R <sup>2</sup>	0.644	0.654	0.655

Panel B

VARIABLES	(1) issuer rating	(2) issuer rating	(3) stand-alone	(4) stand-alone
leverage <sub>t-1</sub>	-19.374** (8.490)	-25.011*** (6.312)	-2.654 (5.209)	-3.474 (4.786)
roa <sub>t-1</sub>	-32.744* (18.217)	-35.547 (21.865)	-23.599 (15.001)	-23.952 (15.519)
mb <sub>t-1</sub>	-0.410* (0.220)	-0.137 (0.246)	-0.259* (0.130)	-0.214 (0.134)
mismatch <sub>t-1</sub>	2.863** (1.337)	3.106** (1.281)	1.047 (0.676)	1.116* (0.642)
size <sub>t-1</sub>	-0.753*** (0.151)		-0.130 (0.107)	
size90 <sub>t-1</sub>		-1.892*** (0.439)		-0.344 (0.299)
constant	30.062*** (7.237)	28.649*** (5.780)	6.559 (4.558)	6.153 (4.400)
Year FE	Y	Y	Y	Y
Observations	16,120	16,120	16,127	16,127
R <sup>2</sup>	0.622	0.492	0.527	0.518

**Table 7: Event Study**

Regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 post + \beta^2 TBTF_{i,t} \times post + \beta^3 Financial_{i,t} \times post + \beta^4 Risk_{i,t} \times post + \beta^5 TBTF_{i,t} \times Financial_{i,t} \times post + \beta^6 TBTF_{i,t} \times Risk_{i,t} \times post + \beta^7 Financial_{i,t} \times Risk_{i,t} \times post + \beta^8 TBTF_{i,t} \times Financial_{i,t} \times Risk_{i,t} \times post + \beta^9 Macro\ Controls_t + Issue\ FE + \varepsilon_{i,b,t}$  are reported in this table. The variable *post* equals 1 if the transaction date is the event date or one of the five trading days following the event date, and 0 if the transaction date is one of the 5 trading days prior to the event date. We measure the systemic importance (*TBTF*) of an institution using the *size90* dummy variable, set equal to one if a given financial institution's size is in the top 90<sup>th</sup> percentile. Risk of a financial institution is measured by distance-to-default (*mertondd*). *financial* is a dummy variable set to one if the firm is a financial firm (SIC code starting with 6). *Issue FE* is an issue fixed effect included in the regression. Other variables are defined in Appendix A. For brevity, we only report the relevant variables. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

Event Date	Event	(1) size90 <sub>t-1</sub> × post	(2) size90 <sub>t-1</sub> × mertondd <sub>t-1</sub> × post	(3) size90 <sub>t-1</sub> × financial <sub>t-1</sub> × post	(4) size90 <sub>t-1</sub> × mertondd <sub>t-1</sub> × financial <sub>t-1</sub> × post
03/13/08	Bear Stearns bailout	-1.149*** (0.224)	0.251** (0.103)	-1.141*** (0.228)	0.401** (0.182)
07/13/08	Paulson requests government funds for Fannie Mae and Freddie Mac	-0.222** (0.106)	0.074 (0.091)	-0.191* (0.110)	0.049 (0.093)
09/20/08	Paulson submits TARP proposal	-1.182*** (0.308)	-0.080 (0.352)	-1.259*** (0.309)	-0.050 (0.356)
10/03/08	TARP passes the U.S. House of Representatives	-1.060*** (0.292)	1.951*** (0.420)	-1.268*** (0.363)	2.186*** (0.439)
10/06/08	The Term Auction Facility is increased to \$900 billion	-0.686** (0.278)	0.808*** (0.310)	-0.878** (0.357)	1.063*** (0.340)
10/14/08	Treasury announces \$250 billion capital injections	-0.927** (0.362)	0.201 (0.281)	-0.748* (0.382)	0.269 (0.291)
11/12/08	Paulson indicates that TARP will be used to buy equity instead of troubled assets	-0.630** (0.272)	0.925** (0.403)	-0.614* (0.316)	0.901** (0.429)
02/02/09	The Federal Reserve announces it is prepared to increase TALF to \$1 trillion	-0.031 (0.086)	0.102 (0.109)	-0.297* (0.162)	0.462*** (0.176)
09/15/08	Lehman Brothers files for bankruptcy	1.005*** (0.329)	-1.464*** (0.293)	1.086*** (0.436)	-1.437*** (0.184)
06/29/10	The House and the Senate conference committees reconcile the Dodd-Frank bill	-0.034* (0.019)	0.039* (0.021)	-0.003 (0.022)	0.033 (0.023)
07/21/10	President Obama signs Dodd-Frank into law	0.027* (0.016)	-0.019 (0.014)	0.017 (0.019)	-0.016 (0.015)
12/10/12	The FDIC and the Bank of England release a white paper and press release describing SPOE	0.037*** (0.012)	-0.028** (0.014)	0.030** (0.014)	-0.029** (0.014)

**Table 8: FDIC Guarantee**

Regression results for the model

$$Spread_{i,b,t} = \alpha + \beta^1 \times Bond\ controls_{i,b,t} + \beta^2 \times guarantee_{i,b,t} + \beta^3 \times guarantee_{i,b,t} \times post + \beta^4 \times mertondd_{i,t-1} + \beta^5 mertondd_{i,t-1} \times post + \beta^6 \times guarantee_{i,b,t} \times mertondd_{i,t-1} + \beta^7 \times guarantee_{i,b,t} \times mertondd_{i,t-1} \times post + Issuer \times Trading\ day\ FE + \varepsilon_{i,b,t}$$

are reported in this table. *mertondd* is Merton's (1974) distance-to-default measure, calculated using firm-level financial and stock return data, described in Appendix A. *guarantee* is a dummy variable set equal to 1 if the bond had a special FDIC guarantee and was issued as part of the Temporary Liquidity Guarantee Program. The regression also includes additional bond controls. *age* is the age of the bond since issuance in years. *puttable* is a dummy variable set equal to 1 if the bond is puttable. *redeemable* is a dummy variable set equal to 1 if the bond is redeemable. *exchangeable* is a dummy variable set equal to 1 if the bond is exchangeable. *fixrate* is a dummy variable set equal to 1 if the bond has fixed rate coupons. The event date is June 29, 2010 (Dodd-Frank). For specifications 1 and 2, the variable *post* equals 1 if the transaction date is the event date or one of the 5 trading days following the event date, and 0 if the transaction date is one of the five trading days prior to the event date. For specifications 3 and 4, *post* equals 1 if the transaction date is the event date or one of the 132 trading days following the event date, and 0 if the transaction date is one of the 132 trading days prior to the event date. The regression includes issuer-trading day fixed effects (*Issuer* × *Trading Day FE*). Other control variables are described in Table 1 and in Appendix A. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively.

VARIABLES	(1) spread	(2) spread	(3) spread	(4) spread
fixed rate	-1.410*** (0.095)	-1.417*** (0.047)	-0.828*** (0.194)	-0.720*** (0.181)
seniority	-0.190* (0.099)	-0.233* (0.103)	-0.259** (0.099)	-0.285** (0.104)
puttable	-0.366* (0.187)	-0.320 (0.198)	-0.227 (0.151)	-0.232 (0.141)
redeemable	0.106 (0.160)	0.160* (0.082)	-0.005 (0.166)	-0.019 (0.126)
ttn	0.090*** (0.015)	0.085*** (0.018)	0.087*** (0.012)	0.083*** (0.012)
exchangeable			1.450*** (0.231)	1.431*** (0.217)
guarantee	-1.780*** (0.227)	-2.712*** (0.181)	-1.413*** (0.202)	-2.190*** (0.129)
guarantee × post	0.134*** (0.022)	0.700** (0.259)	0.001 (0.065)	0.409** (0.129)
mertondd <sub>t-1</sub> × guarantee		0.887*** (0.220)		0.662*** (0.181)
mertondd <sub>t-1</sub> × guarantee × post		-0.604** (0.206)		-0.387** (0.124)
Constant	1.617*** (0.227)	1.675*** (0.174)	1.125*** (0.284)	1.062*** (0.277)
Issuer × Trading Day FE	Y	Y	Y	Y
Event days	10	10	132	132
Observations	2,537	2,090	31,338	30,011
R <sup>2</sup>	0.687	0.703	0.594	0.595

**Table 9: Robustness Checks**

Regression results for the model  $Spread_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + \beta^6 Bond\ Liquidity_{i,b,t} + Year\ FE + \varepsilon_{i,b,t}$  are reported in this table. In columns 1 and 2, we use alternative measures of bond liquidity as additional controls. *liquidity* is a bond liquidity measure based on Longstaff et al. (2005). It is computed based on four bond characteristics – amount outstanding, age, time-to-maturity and rating. *lambda* is a liquidity measure computed by aggregating the *amihud*, *roll*, *range* and *zeros* measures of liquidity described in Table 10. This variable is computed using the TRACE database and is available only after 2003. In columns 4 to 7 we use two alternative measures of systemic importance (*TBTF*). *covar* is the Covar measure of Adrian and Brunnermeir (2011). *srisk* is the systemic risk measure of Acharya et al. (2012) and Acharya et al. (2010). All the variables are described in detail in Appendix A. We use the same set of controls as in column 1 of Table 2. Only the relevant variables of interest are reported for brevity. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively

VARIABLES	(1) spread	(2) spread	(3) spread	(4) spread	(5) spread	(6) spread	(7) spread
mertondd <sub>t-1</sub>	-0.263*** (0.019)	-0.364*** (0.038)	-0.591*** (0.145)	-0.282*** (0.060)	-0.263*** (0.059)	-0.396*** (0.093)	-0.356*** (0.092)
size90 <sub>t-1</sub>	-0.168** (0.067)	-0.353*** (0.143)	-2.743*** (1.005)			-1.913*** (0.634)	-1.552*** (0.573)
liquidity <sub>t-1</sub>	-0.100*** (0.027)						
lambda <sub>t-1</sub>		0.076*** (0.015)	0.068** (0.026)				
covar <sub>t-1</sub>				-9.316** (3.625)		-4.516 (4.099)	
srisk <sub>t-1</sub>					-0.011** (0.005)		-0.006* (0.003)
size90 <sub>t-1</sub> × mertondd <sub>t-1</sub>			0.457*** (0.164)			0.315*** (0.101)	0.254*** (0.095)
Constant	-0.665** (0.289)	3.876*** (0.920)	4.473*** (1.573)	4.365*** (1.105)	3.498*** (0.736)	3.112*** (0.854)	4.113*** (0.877)
Year FE	Y	Y	Y	Y	Y	Y	Y
Rating FE	Y	Y	Y	Y	Y	Y	Y
Controls	Y	Y	Y	Y	Y	Y	Y
Observations	39,125	13,638	13,638	36,504	36,219	36,504	36,219
R <sup>2</sup>	0.521	0.555	0.601	0.422	0.432	0.444	0.443

**Table 10: Liquidity Regressions**

Regression results for the model  $Liquidity_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + Year\ FE + \varepsilon_{i,b,t}$  are reported in this table. We use alternative measures of liquidity which are reported separately in each column. The *amihud* measure is computed as the monthly average absolute value of daily returns divided by total daily dollar volume. The *roll* measure is computed as two times the square root of the negative covariance between two consecutive price changes. The *range* measure is computed as the monthly average of the difference of high and low price of a given bond scaled by square root of volume in a given trading day. The *zeros* is computed as the percentage of days during a month in which the bond did not trade. *lambda* is computed by aggregating standardized values of these four liquidity measures. We use the same set of controls as in column 1 of Table 2. The variables are defined in Appendix A. Only the relevant variables of interest are reported for brevity. Standard errors are reported in parentheses below their coefficient estimates and are adjusted for both heteroscedasticity and within correlation clustered at the issuer level. \*\*\*, \*\*, and \* indicate significance at the 1%, 5%, and 10% two-tailed levels, respectively

VARIABLES	(1) amihud	(2) range	(3) roll	(4) zeros	(5) lambda	(6) amihud	(7) range	(8) roll	(9) zeros	(10) lambda
size90 <sub>t-1</sub>	-0.138** (0.054)	-0.528** (0.214)	-0.313*** (0.110)	-0.218*** (0.058)	-1.150*** (0.332)	-0.133*** (0.043)	0.018 (0.283)	-0.282** (0.117)	-0.197*** (0.047)	-1.056*** (0.280)
financial <sub>t-1</sub>						-0.124** (0.051)	-0.737** (0.344)	-0.430*** (0.123)	-0.106* (0.054)	-1.139*** (0.325)
financial <sub>t-1</sub> × size90 <sub>t-1</sub>						0.002 (0.073)	-0.631 (0.480)	-0.057 (0.159)	-0.018 (0.076)	-0.114 (0.439)
Constant	-0.189 (0.275)	3.368 (2.243)	2.363*** (0.585)	-0.089 (0.285)	-2.174 (1.833)	0.159 (0.165)	2.989*** (1.014)	1.843*** (0.382)	0.558*** (0.139)	-1.342 (1.004)
Year FE	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Rating FE	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Controls	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Observations	15,451	19,005	13,999	21,670	13,988	27,498	36,812	24,242	45,249	24,226
R-squared	0.113	0.113	0.319	0.210	0.273	0.143	0.137	0.320	0.266	0.327