

Written Testimony of Deniz Anginer for the hearing “Examining the GAO Report on Government Support
for Bank Holding Companies”

before the Senate Subcommittee on Financial Institutions and Consumer Protection

United States Senate, July 31, 2014

Mr. Chairman and the Distinguished Members of the Subcommittee, thank you for convening today’s hearing, and inviting me to testify. My name is Deniz Anginer. I am an assistant Professor at the Pamplin Business School at Virginia Tech. Along with my colleagues, Viral Acharya and Joe Warburton, I have examined market expectations of implicit government guarantees to so called “too-big-to-fail” institutions.¹ Most of my testimony is based on this research.

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. In our research, we find that large financial institutions and their investors expect the government to back the debts of these institutions should they encounter financial difficulty. These expectations of government support are embedded in the prices of bonds issued by major financial institutions, allowing them to borrow at lower rates.

Expectation of government support by the market also results in a distortion in how risk is reflected in the debt prices of large financial institutions. An implicit government guarantee dulls market discipline by reducing investors’ incentives to monitor and price the risk taking of large financial institutions. In our analyses, we show that while a positive relationship exists between risk and cost of debt for medium and small sized institutions, this relationship is 75% weaker for the largest institutions. Changes in leverage and capital ratios are, likewise, less sensitive to changes in risk for these large institutions.²

Because they pay a lower price for risk than other financial institutions, the perceived guarantee provides TBTF institutions with a funding advantage. We find that the implicit subsidy has provided these institutions an average funding cost advantage of approximately 30 basis points per year over the

¹ Viral V. Acharya, Deniz Anginer, and A. Joseph Warburton, *The End of Market Discipline? Investor Expectations of Implicit Government Guarantees* (available at: <http://ssrn.com/abstract=1961656>).

² Acharya, Anginer and Warburton (2014).

1990-2012 period, peaking at more than 100 basis points in 2009. The total value of the subsidy amounted to about \$30 billion per year on average over the 1990-2012 period, topping \$150 billion in 2009. We have also examined non-financial firms. 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 size subsidy similar to that of large financial institutions. However, we find this is not the case.

Compared to the GAO study, we find lower implicit subsidy values for the years 2007 to 2011 and slightly higher numbers in 2012. We have not examined 2013, the year in which the GAO finds the greatest decline. Although most of the attention will be paid to the analyses that try to quantify the dollar values of the subsidy and its changes over time, it is important to note that it is very difficult to directly relate these changes to the introduction of Dodd-Frank and other regulations.

It is very hard to separate out changes in probabilities of large financial institutions experiencing distress from the probability that they will be bailed out. As the GAO report points out, this is especially true as the risk premium has declined in recent years and the large financial institutions have seen significant improvements in their balance sheets and capital ratios reducing their probability of experiencing financial distress.

Although it is very difficult to establish a direct link between regulations and changes in subsidy over time, examining these changes using alternative methods over a short time window would be more helpful in analyzing the impact of Dodd-Frank and other regulations. For instance, in our study we examined changes in risk sensitivities of cost of debt after the introduction of Dodd-Frank. We examined changes in subsidies accruing to large financial firms compared to non-financial firms. We also examined the cost of implicitly guaranteed debt to explicitly guaranteed debt issued by the same firm under FDIC's Temporary Liquidity Guarantee Program.

Using these alternative approaches, we find that Dodd-Frank did not significantly alter investors' expectations that the government will bail out TBTF financial institutions should they falter. Despite its no-bailout pledge, Dodd-Frank 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 institutions.³ As former Kansas City Fed President, 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.”

Finally, it is also important to note that the analyses conducted by us and the GAO only measure the direct subsidy that may accrue to TBTF institutions. There may be other indirect effects such as misallocation of capital or excessive and correlated risk-taking (to exploit the implicit guarantee) that are not captured by the analyses.

Governments are generally not required to make any apparent financial commitment or outlay, or request funds from legislatures or taxpayers, when they implicitly guarantee TBTF institutions. Implicit guarantees lack the transparency and accountability that accompany explicit policy decisions. Taxpayer interests could be better served, in both good times and bad, by estimating on an ongoing basis the accumulated value of this subsidy. Public accounting of accumulated TBTF costs might restrain those government actions and policies that encourage TBTF expectations.

Thank you for your time.

Deniz Anginer

³ See, e.g., David Skeel, *The New Financial Deal: Understanding the Dodd-Frank Act and Its (Unintended) Consequences* (2011); Arthur E. Wilmarth, “The Dodd-Frank Act: A Flawed and Inadequate Response to the Too-Big-to-Fail Problem,” 89 *Oregon Law Review* 951 (2011); Standard & Poor’s, “The U.S. Government Says Support for Banks Will Be Different ‘Next Time’ – But Will It?,” (July 12, 2011). One aspect of the recent regulations, that our analyses suggest had a mild impact in reducing market expectations of support, is the release of the specifics of the FDIC’s Single Point-of-Entry approach to resolving financial institutions under OLA. This is consistent with the GAO interviews with large investors who point to the SPOE approach as affecting their expectations of future government support.

References:

Acharya, V., D. Anginer, and A. J. Warburton (2014) "The End of Market Discipline? Investor Expectations of Implicit State Guarantees." NYU Working Paper.

Skeel, David, (2011), *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).

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.

Appendix

“The End of Market Discipline? Investor Expectations of Implicit State Guarantees,” by Viral Acharya, Deniz Anginer and Joe Warburton, June, 2014.

The End of Market Discipline?

Investor Expectations of Implicit Government Guarantees⁴

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Abstract

We find that bondholders of major financial institutions have an expectation that the government will shield them from large financial losses and, as a result, they do not accurately price risk. Using bonds traded in the U.S. between 1990 and 2012, and using alternative approaches to address endogeneity, we find that bond credit spreads are sensitive to risk for most financial institutions, but not for the largest institutions. This expectation of government support constitutes a subsidy to large financial institutions, allowing them to borrow at lower rates. Recent financial regulations that seek to address too-big-to-fail have not had a significant impact in eliminating expectations of government support.

JEL Classifications: G21, G24, G28.

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

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I. Introduction

“If the crisis has taught a single lesson, it is that the too-big-to-fail problem must be resolved,” declared U.S. Federal Reserve Chairman Ben Bernanke in 2010 when testifying before the U.S. Financial Crisis Inquiry Commission. We find that, despite efforts to end too-big-to-fail, the financial markets believe that the government will bail out major financial institutions should they falter. This results in a distortion in how risk is priced by investors in the market and an implicit subsidy that 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. It is commonly claimed that large financial institutions and their investors expect the government to back the debts of these institutions should they encounter financial difficulty. This expectation 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.

Although it is often assumed that investors expect government bailouts for large financial institutions, few studies have attempted to provide evidence of that expectation, or to measure the funding subsidy that implicit government protection is alleged to offer. In this paper, we show that the implicit guarantee is priced by investors, which results in a distortion in how risk is reflected in the debt prices of large financial institutions. 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.⁸ 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. Using a number of alternative methods to address potential endogeneity, 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 perceived guarantee provides TBTF institutions with a funding advantage.

The funding advantage does not arise because large institutions are necessarily safer than smaller ones. We address potential endogeneity in the relationship between institution size and spreads by showing that large institutions are not less risky than smaller ones. Our findings contradict the "charter value" hypothesis put forth by Bliss (2001, 2004) and others. In addition, 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 (as measured by asset volatility), and find that this relationship breaks down for large financial institutions. We also examine the fair value of insuring

⁸ 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."

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.

To further alleviate endogeneity concerns, we carry out four additional analyses. First, we examine investor expectations of implicit support for non-financial companies. 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 size subsidy similar to that of large financial institutions. However, we find this is not the case. Using a difference-in-differences approach, we compare the differences in credit spreads of large and small financial institutions to differences in credit spreads of large and small companies in the non-financial sector. We find that a substantial size subsidy exists for financial institutions even after controlling for the effect of size on credit spreads for non-financial institutions. 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 institutions.

Second, 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 find that investors price the institution's likelihood of receiving government support.

Third, 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. We also find that passage of Dodd-Frank did not have a significant impact on eliminating expectations of future government support. 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: despite the adoption of Dodd-Frank, investors continue to expect the government to bail out TBTF financial institutions should they falter.

In addition to showing that investors in major financial institutions expect government support should the institution run into severe financial difficulty, we also estimate the value of that expectation. That is, we provide an estimate of the reduction in funding costs for TBTF financial institutions as a result of implied government support. While the direct costs of government bailouts are relatively straightforward to identify and quantify, the indirect costs arising from implicit government guarantees are more challenging to compute and have received less attention. 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, peaking at more than 100 basis points in 2009. The total value of the subsidy amounted to about \$30 billion per year on average over the 1990-2012 period, topping \$150 billion in 2009. Internalizing this cost would better align risk with return for implicitly guaranteed institutions, producing a more stable and efficient financial system.

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. In Section VI, we discuss policy implications, and we conclude in Section VII.

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; Jagtiani and Lemieux 2001; Allen, Jagtiani and Moser 2001; Morgan and Stiroh 2000 and 2001; Calomiris 1999; Levonian 2000; Hancock and Kwast 2001; Covitz, Hancock and Kwast 2004; 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. These studies do not consider potential price distortions arising from conjectural government support. For large institutions, the spread-to-risk

relationship might diminish or break down if implicit guarantees are factored into market prices. In other words, these studies do not address TBTF.

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 the banks declared “too big to fail” by the Comptroller of the Currency in 1984, in order to differentiate TBTF banks from non-TBTF banks. 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, Balasubramnian and Cyree (2011) suggest that the spread-risk relationship flattened

for TBTF banks following the rescue of Long-Term Capital Management in 1998. In these studies, however, the TBTF definition (one of the eleven banks named “too big to fail” by the Comptroller) is one originating in 1984. Not only do these studies focus on a short list of banks from 1984, they also examine a limited period of time. In contrast, we identify TBTF institutions by employing multiple measures of bank size and systemic risk contribution. Our TBTF definition captures time variation and is a more relevant definition in today’s environment. While their definition of TBTF may suit the time period they analyze (the 1980s and 1990s), we analyze a longer period of time (1990-2012), including the recent financial crisis. We also undertake a more detailed analysis of the role TBTF status plays in the spread-risk relationship. In addition, and more importantly, we address endogeneity issues by performing multiple robustness tests.

Despite the magnitude of the implicit subsidy, few studies in the existing literature have attempted to quantify it. Since the recent financial crisis, however, there has been renewed interest in the subject. 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. This approach uses the ratings uplift to proxy for funding costs. The uplift in ratings is translated into a basis point savings in bond yields (Haldane 2010, 2012; Ueda and Mauro 2011; Rime 2005; Soussa 2000). These studies, however, measure reductions in funding costs only indirectly, by studying differences in credit ratings, not directly as we do 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.⁹

The 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 the 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

⁹ In addition, these studies use limited controls for differences in bank characteristics and risk. They also examine limited time periods. For instance, Ueda and di Mauro (2011) examine only two cross sections (year-end 2007 and year-end 2009) while Rime (2005) examines only the 1999-2003 period. And they generally do not focus on the U.S. but rather examine a selection of banks worldwide.

offer relative to those offered by small banks, and the lower cost at which they can provide those services, as well as large banks' ability to access alternative funding sources.

A third approach to measuring funding costs, which we employ, uses bond prices to examine funding cost differentials for TBTF and non-TBTF financial institutions. 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. Several contemporaneous papers take this approach (Santos 2014; Araten and Turner 2013; Baker and McArthur 2009). Our study employs more numerous controls, and examines a longer period of time, than these papers, which generally use limited controls, examine shorter time periods and do not capture the time-varying effects of TBTF status. We also exploit natural experiments to assess changes in investors' TBTF expectations over time. We also include results from a difference-in-differences approach throughout our paper to confirm that the large versus small differential is greater in the finance industry than in non-financial industries.¹⁰

Although most research on implicit government guarantees has examined debt prices, some studies have investigated equity prices. These papers provide indirect evidence of a funding subsidy arising from implicit government support. While the immediate and most-valued beneficiaries of TBTF policies will be the debtholders, equity studies conjecture that implicit support will impact a TBTF bank's stock price by reducing its cost of funds, thereby increasing profitability. Studies find a positive relationship between bank size and equity prices. O'Hara and Shaw (1990) find that positive wealth effects accrued to shareholders of the eleven banks named TBTF by the Comptroller in 1984. Others suggest that shareholders benefit from mergers and acquisitions that result in a bank achieving TBTF status. Studies report that mergers undertaken by the largest banks increase market value for shareholders, while this is not the case for smaller banks, suggesting market prices reflect safety net subsidies for TBTF banks (e.g., Kane 2000). Hence, studies have focused on premiums paid in bank M&A activity, finding that greater premiums are paid in larger transactions, reflecting the benefits of safety net subsidies (Brewer and Jagtiani 2007; Molyneux, Schaeck and Zhou 2010). Penas and Unal (2004) show that bond spreads also tend to decline after a bank merger, and that the declines are greatest when the size of the resulting entity exceeds a threshold of 2% of all banking assets.

¹⁰ We improve upon these papers in other respects as well. For instance, we use a variety of alternative proxies to identify TBTF financial institutions (some size-based and some systemic risk-based) and employ a host of robustness checks to address potential endogeneity. Moreover, while some studies examine CDS data, bond spread data are available for a greater number of firms and over a longer time period.

Our paper is also related to a literature that examines implicit guarantees and risk taking by banks. Although we focus on investors, implicit guarantees can also affect bank managers. The empirical literature on moral hazard generally concludes that banks increase their risk taking in the presence of government guarantees, as the guarantee provides protection against losses (Duchin and Sosyura 2012; Gropp, Hakenes and Schnabel 2010; Gropp, Gruendl and Guettler 2010; De Nicoló 2000; Hovakimian and Kane 2000; Boyd and Runkle 1993; Boyd and Gertler 1994; Demirguc-Kunt and Detragiache 2002, 2006). However, the evidence is far from unambiguous and some studies find that guarantees reduce risk taking (Kacperczyk and Schnabl 2011; Gropp and Vesala 2004; Cordella and Yeyati 2003), possibly resulting from increased charter values (Bliss 2001 and 2004; Keeley 1990) or greater regulatory oversight.

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 99th percentile value of a given variable to the 99th 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 90th 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*).¹¹ 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 Brunnermeier (2011)

¹¹ For non-financial firms, we compute a similar measure. Since financials make up close to 40% of the sample, we group all non-financial firms together when we rank these firms by size and assign a dummy variable if they are in the top 90th 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.

Covar measure (*covar*), and the Acharya, Engle and Richardson (2012) and Acharya et al. (2010a) 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.¹² 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.

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 scaling the standard deviation of equity returns of large banks to be equal to those of smaller banks. Each month, we compute the ratio of average standard deviations of banks in the top 90th percentile in terms of size, to all other banks. We then scale the standard deviations of banks in the 90th percentile by the computed ratio each month, such that the average standard deviations of large and small banks are equal. We use the scaled standard deviations to compute an adjusted distance-to-default measure (*adj-mertondd*). 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. We use the exponential moving average method (EWMA) to compute standard deviations, which are then used

¹² 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 Demirguc-Kunt (2011), Bongini, Laeven, and Majnoni (2002), Bartram, Brown and Hundt (2008) and others have used the Merton model to measure the default probabilities of commercial banks.

to construct this alternative distance-to-default measure (*ewma-mertondd*). We also use equity return volatility (*volatility*), without imposing any structural form, as a risk measure.¹³ 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 changes of distance-to-default on the monthly changes of value-weighted average distance-to-default of all other firms using past 36 months of past data.

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 (*tmm*) 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.

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:

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

¹³ 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.

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 examine 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 90th 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. 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. It is, therefore, important to adjust for this general size advantage when estimating investor expectations of government support. 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 the non-financial sector. 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 the non-financial sector (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.¹⁴ 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*¹⁵. 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). 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

¹⁴ 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.

¹⁵ *Size90* indicates a firm in the top 90th percentile of its size distribution.

systemically-important status, spreads are less sensitive to risk. This result is consistent with investors pricing an implicit government guarantee for the largest financial institutions. In column 2, we add dummy variables indicating an institution between the 60th and 90th percentiles (*size60*) and between the 30th and 60th percentiles (*size30*). We interact all the size dummy variables with *mertondd*. The interaction coefficients on *size60* and *size30* lack significance. These results indicate that the effect of size on the spread-to-risk relationship comes from the very large financial institutions. Moreover, the result is robust to different measures of risk. In place of *mertondd*, we employ z-score (*zscore*) in column 3 and volatility (*volatility*) in column 4. 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 Figures 1 and 2. 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? Figure 2 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, Figure 2 indicates that larger institutions do not offer lower risk of large losses than smaller institutions. Hence, together the two figures provide 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 scaling the standard deviation of equity returns of large banks to be equal to those of smaller banks. We replicate the risk sensitivity analyses using *adj-mertondd* as our measure of risk. The results in column 5 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*.¹⁶ Following Longerstaeey et al. (1996), we use a weighting coefficient

¹⁶ Exponentially weighted moving average standard deviations are computed as: $\sigma_{i,t}^2 = \lambda \sigma_{i,t-1}^2 + (1 - \lambda) \varepsilon_{i,t-1}^2$.

of 0.94. This approach places more weight on recent equity returns in computing standard deviations. The results in column 6 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 changes of distance-to-default on the monthly changes of value-weighted average distance-to-default of all other firms using 36 months of past data.¹⁷ 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 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 7 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 $financial_{t-1} \times Risk_{t-1} \times size90_{t-1}$ 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-financial institutions 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 Hovakamian and Kane (2000) and assume a linear relationship between changes in market leverage and changes in risk as

¹⁷ In computing the *dd-beta*, we require the company to have at least 24 non-missing monthly changes in distance-to-default over the previous 36 months.

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 γ^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 $D/V_{i,t} = \alpha + \beta^1 \Delta s_{A_{i,t}}$ 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 γ^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 each year:

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

where our variable of interest, *size90*, indicates a firm in the top 90th 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 year, in Figure 2. The implicit subsidy provided large financial institutions a funding cost advantage of approximately 30 basis points per year, on average, over the 1990-2012 period. The subsidy increased to over 100 basis points in 2009.

We also quantify the dollar value of the annual implicit subsidy accruing to major financial institutions. We multiply the annual reduction in funding costs by total uninsured liabilities (in US\$ millions) to determine the yearly dollar value of the subsidy, reported in Figure 2.¹⁸ The subsidy was \$30 billion per year on average; in 2009, it was over \$150 billion.

Despite the magnitude of the implicit subsidy, few studies have attempted to quantify it, although some have attempted to measure explicit government support. For instance, Laeven and Valencia (2010) estimate that the direct fiscal cost of the U.S. government's response to the recent financial crisis amounted to approximately 5% of GDP. Veronesi and Zingales (2010) estimate the direct cost to be between \$21 billion and \$44 billion.¹⁹ Direct costs of bailouts have always caught the public's attention (Stern and Feldman 2004). Indeed, there is a growing concern that bailouts may have grown so large that they are straining the public finances in many countries and governments cannot continue to afford them (e.g., Brown and Dinç 2011; Demirgüç-Kunt and Huizinga 2010).

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

¹⁸ 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.

¹⁹ Veronesi and Zingales (2010) use bailout events to quantify the value of the subsidy. While that approach may reveal the change in the subsidy that a particular intervention produced, it does not capture the level of the subsidy, which can be substantial even during periods between crises.

received less attention. Our approach recognizes that, even when the banking system appears strong, safety net subsidies exist for large financial institutions.

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 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. A growing literature argues that economies exist in banking (Wheelock and Wilson 2001, 2012; 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 (e.g., Stiroh 2000; Berger and Mester 1997). Moreover, most research has concluded that economies exist only for financial institutions that are not very large (Amel et al. 2004; Berger and Humphrey 1994; Berger and Mester

1997).²⁰ 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:

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

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 (4) 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 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.

²⁰ 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.

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).²¹

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.

²¹ 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.

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.

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.²² 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 the

²² 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.

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

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

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

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:

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

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-financial institutions. 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.²³ 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

²³ 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.

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 $size_{90} \times merton_{dd} \times post$ 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 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.

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.²⁴

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.²⁵ 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 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:

$$Spread_{i,b,t} = \alpha + \beta^1 Bond\ Controls_{i,b,t} + \beta^2 guarantee_{i,t-1} + \beta^3 Firm \times Trading\ Day\ FE + \varepsilon_{i,b,t} \quad (8)$$

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).²⁶ The results appear in Table BII of Appendix B.

²⁴ 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, institutions 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.

²⁵ 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.

²⁶ Our sample includes bonds of all institutions that have issued both types of bonds. We address bonds with extreme yields by winsorizing at the 99th 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.

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 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. Additional Robustness Checks

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 bond trades for the full sample period, we create a liquidity measure (*liquidity*) based on bond characteristics following Longstaff, Mithal and Neis (2005).²⁷ The maximum *liquidity* score assigned to a bond is four and the minimum *liquidity* score is zero. In column 1, the *size90* variable retains its significance in the presence of this liquidity measure. Next, in column 2, we use bond turnover (*turnover*) as our liquidity control. The *turnover* variable is constructed using data after 2003 from the TRACE dataset, which includes trade information. We compute turnover using the past three months of daily trading information. The *size90* variable retains its significance in the presence of *turnover*.

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 3, 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. (2010a). Results in column 4 show a significant negative relationship between *srisk* and *spread*. The greater an institution's systemic risk, the lower its spread. In columns 5 and 6, 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.

²⁷ In particular, a dummy variable is set each month to a value of one or zero depending on the characteristics of the underlying bond. We then add up the dummy variables to come up with an overall liquidity score. The first dummy variable captures the general availability of the bond issue in the market. If the outstanding market value of a bond is larger than the median value of all bonds, then the dummy variable is assigned a value of one. The second variable is the age of the bond and parallels the notion of on-the-run and off-the-run bonds in Treasury markets, with on-the-run bonds being more liquid. If the age of a bond is less than the median age of all bonds then the dummy variable is assigned a value of one. The third variable is the time to maturity of the bond. It has been shown that there exist maturity clienteles for corporate bonds and that shorter-maturity corporate bonds tend to be more liquid than longer-maturity bonds. If the time to maturity of a bond is less than seven years then the dummy variable is assigned a value of one. The fourth proxy that we use is a dummy variable for bonds rated AAA/AA. As Longstaff, Mithal and Neis (2005) show, highly rated bonds tend to be more marketable and liquid in times distress when there is a "flight to quality."

VI. Policy Implications

As Figure 2 shows, 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.²⁸ Even when the banking system appears strong, large financial institutions benefit from expectations of TBTF assistance. In the post-crisis period after 2009, the implicit subsidy has remained at positive levels. The passage of Dodd-Frank in the summer of 2010 did not significantly alter investors' expectations of government support.

The centerpiece of Dodd-Frank is the creation of the Financial Stability Oversight Council whose objective is, in part, to "promote market discipline, by eliminating expectations on the part of shareholders, creditors, and counterparties of [large financial] companies that the government will shield them from losses in the event of failure." In pursuit of this objective, the Council is empowered to designate certain companies as "systemically important" if their failure will cause instability of the financial system and to subject them to additional oversight, including liquidation.

Despite Dodd-Frank's explicit no-bailout pledge, the Act leaves open many avenues for future TBTF rescues.²⁹ Prior to any resolution, the Federal Reserve can offer a "broad-based" lending facility to a group of financial institutions to provide an industry-wide bailout or a single-firm bailout in disguise. In addition, Congress has the option to abandon Dodd-Frank by explicitly amending or repealing the statute or by allowing regulators to interpret their authority to protect creditors and partner with large financial institutions (see, e.g., Skeel 2011; Wilmarth 2011; Standard & Poor's 2011).

Since any resulting bailouts are likely conducted using public funds, the implicit guarantee produces a transfer of resources from the government, and ultimately taxpayers, to major financial

²⁸ In response to the rescue of Continental Illinois in 1984, the government took steps to erode the perception that it backed large financial firms. In 1991, Congress passed the FDIC Improvement Act (FDICIA). It was believed that FDICIA would limit regulators' discretion to support distressed banks and enable regulators to save insured depositors without saving uninsured investors. Accordingly, Figure 2 shows a decline in the implied subsidy during this period, reflecting diminishing expectations of government support for the largest financial institutions. In contrast, expectations of government support increased during the late 1990s. In 1997 and 1998, the government responded to perceived threats to financial stability that emanated from currency crises in emerging economies. In 1998, the Federal Reserve Bank of New York brokered a bailout of hedge fund Long-Term Capital Management. In responding to the recent financial crisis, government actions nearly formalized the implicit public guarantee of the financial sector. As Figure 2 shows, investor expectations of government assistance surged to very high levels.

²⁹ For instance, although Dodd-Frank grants new authority to officials to resolve large institutions, 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."

institutions.³⁰ Governments are generally not required to make any apparent financial commitment or outlay, or request funds from legislatures or taxpayers, when they implicitly guarantee TBTF institutions. Since it happens implicitly, the transfer lacks the transparency and accountability that accompany explicit policy decisions. Taxpayer interests could be better served, in both good times and bad, by estimating on an ongoing basis the accumulated value of this subsidy. Public accounting of accumulated TBTF costs might restrain those government actions and policies that encourage TBTF expectations. Researchers have made similar recommendations in connection with government guarantees in other contexts, ranging from pensions to student loans to housing (e.g., Lucas 2011, 2012, 2013; Lucas and McDonald 2006).

In addition to public accounting and disclosure, large financial institutions could be charged a Pigovian-style tax designed to compensate for the underpricing of risk that results from an implicit guarantee. That is, the funding subsidy that big institutions enjoy could be neutralized by imposing a corrective levy, tax, or premium that extracts the value of the subsidy. This charge would act as a form of compensation for the public support large financial institutions are “expected” to receive in the event of a financial crisis. The goal is not to make institutions pre-pay future rescue costs, but to realign incentives among the beneficiaries of an implicit guarantee.³¹ Thus, policymakers could require financial institutions to bear the true cost of their debt, resulting in a more proper alignment of risk and return for owners and managers. Similar recommendations have been put forth in papers examining the pricing of deposit insurance (e.g., Acharya, Santos and Yorulmazer 2010b). Such a Pigovian tax would be more straightforward and transparent than extensive government supervision and regulation that attempts to manage risk taking (the Dodd-Frank Act required 2,319 pages of legislation and mandates hundreds of additional rules, yet it does not directly address mispricing of conjectural government guarantees, leaving expectations of support to persist). If the cost of the implicit guarantee is instead

³⁰ Dodd-Frank seeks to end this wealth transfer by requiring that the costs of resolving failed financial institutions be imposed on the surviving ones, not taxpayers. But during a systemic crisis, it is unlikely that the solvent part of the sector will be used to cover the losses of the failed part of the sector. Since capital is needed most during a crisis, taxpayer funds are likely to be used instead.

³¹ In contrast to Dodd-Frank’s ex post tax on financial institutions, recent proposals have called for an ex ante tax on financial institutions, with the intent to recoup future bailout costs. Most of the proposed taxes are not particularly sophisticated in design [i.e., levied at a uniform rate on total assets or total liabilities net of insured deposits, see IMF (2010)] and may result in simply transferring funds from well-managed institutions to reckless ones instead of mitigating moral hazard. We propose instead a tax designed specifically to capture the subsidy a financial institution enjoys as a result of an implicit government guarantee. Such a tax is intended to better align risk and return for bank owners and managers.

internalized through a Pigovian tax, market discipline could then work with supervisory discipline to create a more stable and efficient financial system.³²

VII. 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. The cost of this implicit insurance can be internalized to enable financial institutions to compete on a level playing field. In addition, requiring large financial institutions to bear the true cost of their debt would better align risk with return for their owners and managers, promoting a more stable and efficient financial system. Until it is internalized, implicitly-guaranteed institutions will be incentivized to take actions that promise rewards to their owners and managers while imposing costs on the rest of society.

³² We recognize that, even in an efficient market without any guarantees, it is possible for there to be externalities associated with being systemically important that will not be fully internalized (e.g., Zingales 2009; Acharya et al. 2010a).

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Figure 1: Size, Spreads and Risk

The figure 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.

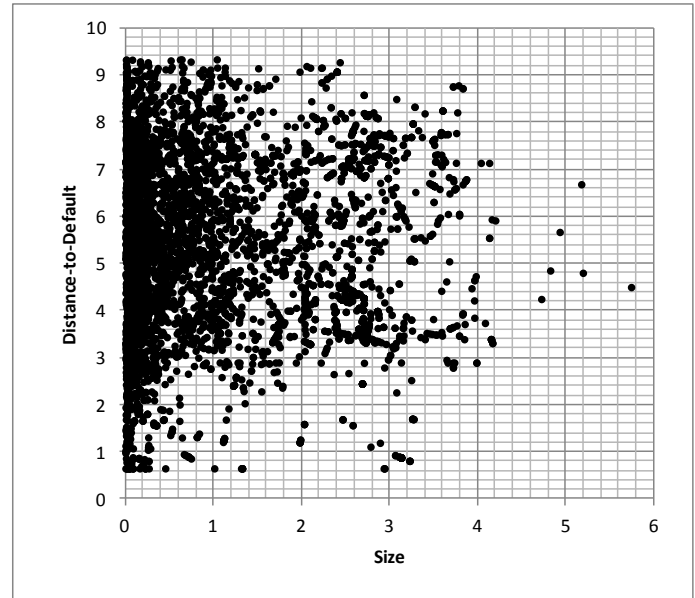
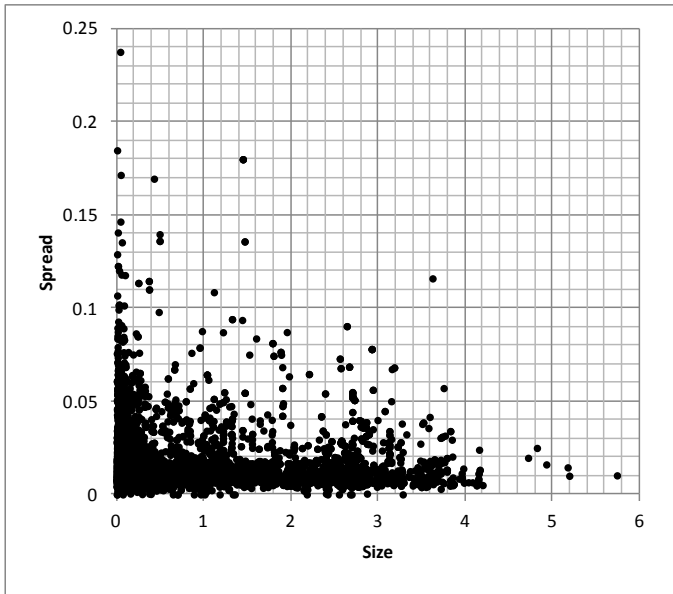


Figure 2: Value of the Implicit Subsidy (1990-2012)

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 each year: $Spread_{i,b,t} = \alpha + \beta^1 seniority_{i,b,t} + \beta^2 ttm_{i,b,t} + \beta^3 leverage_{i,t} + \beta^4 roa_{i,t} + \beta^5 mb_{i,t} + \beta^6 mismatch_{i,t} + \beta^7 mertondd_{i,t} + \beta^8 def_t + \beta^9 term_t + \beta^{10} mkt_t + \beta^{11} size90_{i,t} + \varepsilon_{i,b,t}$. All the variables are defined in Table 1 and Appendix A. The coefficient on *size90* (z-axis) represents the subsidy accruing to large financial institutions. We also quantify the dollar value of the annual subsidy. We multiply the annual reduction in funding costs by total uninsured liabilities (in US\$ millions) to arrive at the yearly dollar value of the subsidy (y-axis). The dollar amounts are adjusted for inflation and are in constant 2010 dollars.

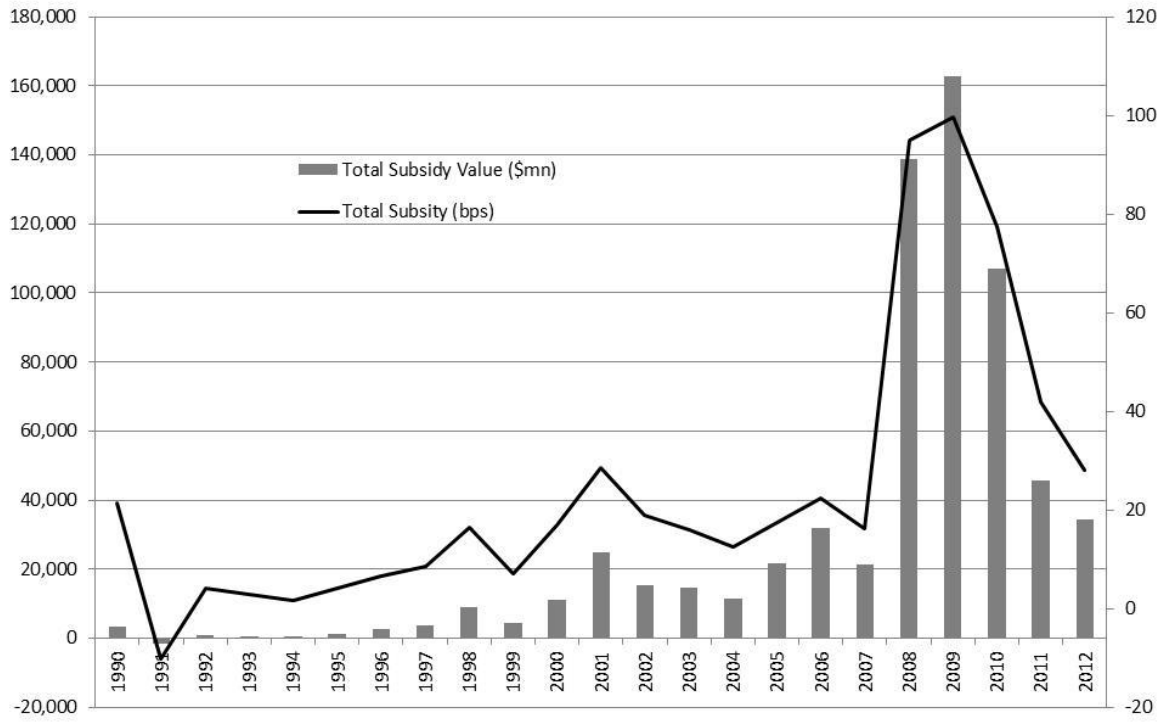


Figure 3: Explicit and Implicit Guarantee Spread Difference

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.

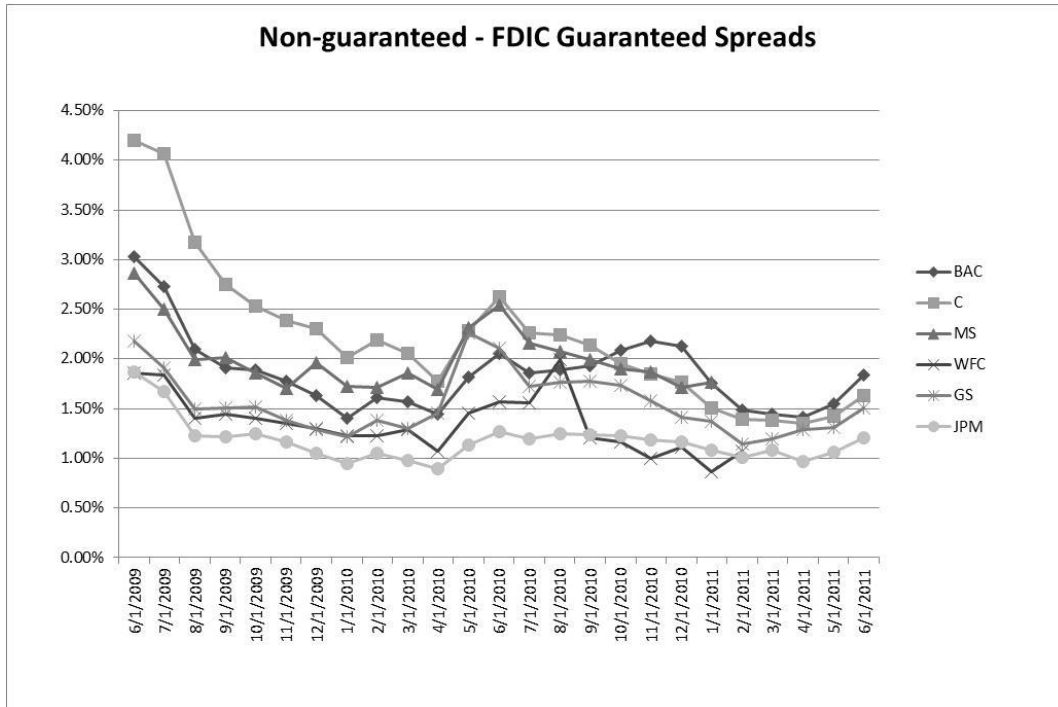


Figure 4: Explicit Guarantee Premium

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.

Estimated FDIC Gurantee Premium

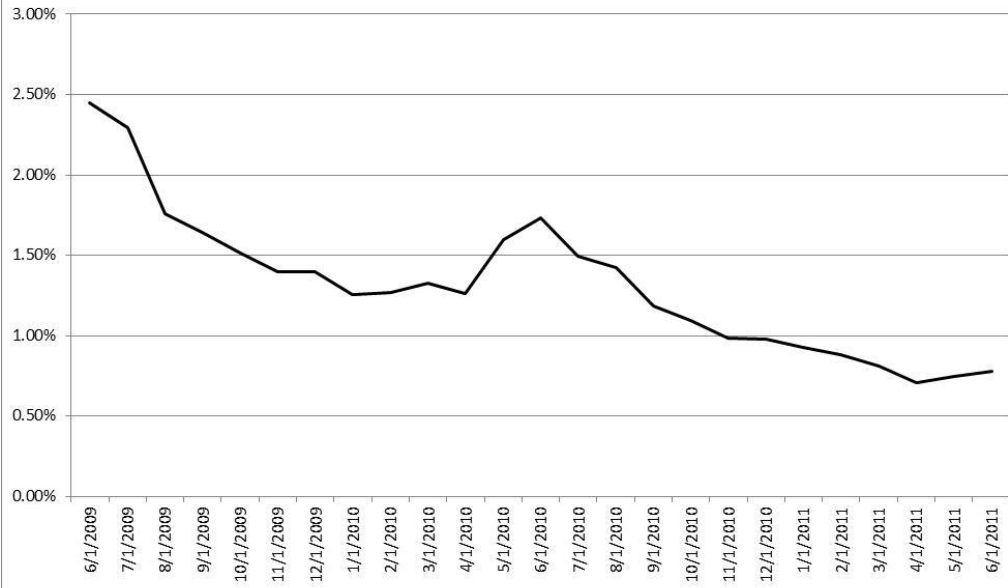


Table 1: Summary Statistics

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 ration 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
<i>ttm</i>	45616	6.960	5.876	3.056	5.375	8.747
<i>seniority</i>	45616	0.695	0.460	0.000	1.000	1.000
<i>spread</i>	45616	2.371	11.221	0.703	1.019	1.776
<i>size</i>	45616	11.459	1.693	10.405	11.430	12.636
<i>roa</i>	45616	0.012	0.025	0.005	0.010	0.014
<i>mismatch</i>	45207	0.068	0.182	-0.031	0.046	0.151
<i>leverage</i>	45616	0.896	0.092	0.895	0.919	0.943
<i>mb</i>	45542	1.632	0.892	1.093	1.450	1.969
<i>mertondd</i>	45616	5.278	1.999	3.976	5.601	6.839
<i>zscore</i>	43869	37.267	40.670	13.901	24.975	46.487
<i>volatility</i>	45616	0.365	0.248	0.211	0.280	0.397
Panel B: Non-Financial Firms						
Variables	N	Mean	Std Dev	P25	P50	P75
<i>ttm</i>	78698	11.106	10.747	4.061	7.817	15.733
<i>seniority</i>	78698	0.975	0.155	1.000	1.000	1.000
<i>spread</i>	78698	2.072	4.441	0.674	0.998	1.760
<i>size</i>	78469	9.294	1.296	8.379	9.328	10.126
<i>roa</i>	78469	0.043	0.064	0.016	0.043	0.074
<i>mismatch</i>	78462	0.012	0.169	-0.056	0.001	0.071
<i>leverage</i>	78465	0.660	0.137	0.568	0.652	0.744
<i>mb</i>	78084	3.005	12.310	1.290	1.987	3.243
<i>mertondd</i>	78698	5.929	2.204	4.405	5.835	7.366
<i>zscore</i>	77097	29.524	40.890	10.172	18.549	35.816
<i>volatility</i>	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 90th 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
ttm	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 _{t-1}	-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 _{t-1}	-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 _{t-1}	-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 _{t-1}	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 _{t-1}	-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 _{t-1}	-0.246*** (0.065)	-0.191** (0.084)				
size90 _{t-1}			-0.320** (0.148)			0.019 (0.120)
size_top_10 _{t-1}				-0.331** (0.148)		
size _{t-1} × bank dummy					-0.382** (0.183)	
size _{t-1} × insurance dummy					-0.296 (0.334)	
size _{t-1} × broker dummy					-0.196 (0.209)	
financial _{t-1}						-0.284** (0.181)
size90 _{t-1} × financial _{t-1}						-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 ²	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 90th percentile. In column 2, 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 60th and 90th percentiles. *size30* is a dummy variable equal to one if a given financial institution's size is between the 30th and 60th percentiles. *Risk* of a financial institution is measured by distance-to-default (*mertondd*) in columns 1 and 2, z-score (*zscore*) in column 3, and volatility (*volatility*) in column 4, the adjusted distance-to-default measure (*adj-mertondd*) in column 5, the distance-to-default measure computed using exponentially weighted moving average standard deviations (*ewma-mertondd*) in column 6, and credit risk beta (*dd-beta*) in column 7. *adj-mertondd* is the Merton's distance-to-default measure, calculated using scaled standard deviations for firms in the 90th percentile in terms of size to match the average standard deviations of all other firms in a given month. *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 and Appendix A. 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) spread	(2) spread	(3) spread	(4) spread	(5) spread	(6) spread	(7) spread
size90 _{t-1}	-2.022 ^{***} (0.568)	-2.246 ^{***} (0.495)	-1.305 ^{***} (0.401)	0.876 ^{***} (0.256)	-1.532 ^{***} (0.443)	-1.211 ^{***} (0.384)	-0.172 [*] (0.091)
size60 _{t-1}		-0.577 (0.821)					
size30 _{t-1}		0.911 (0.972)					
mertondd _{t-1}	-0.446 ^{***} (0.082)	-0.354 ^{***} (0.080)					-0.291 ^{***} (0.054)
size90 _{t-1} × mertondd _{t-1}	0.332 ^{***} (0.091)	0.246 ^{***} (0.083)					
size60 _{t-1} × mertondd _{t-1}		-0.033 (0.135)					
size30 _{t-1} × mertondd _{t-1}		-0.233					

		(0.164)					
zscore _{t-1}			-0.336 ^{***}				
			(0.082)				
size90 _{t-1} × zscore _{t-1}			0.266 ^{**}				
			(0.115)				
volatility _{t-1}				4.885 ^{***}			
				(1.106)			
size90 _{t-1} × volatility _{t-1}				-3.342 ^{***}			
				(0.824)			
adj-mertondd _{t-1}					-0.179 ^{***}		
					(0.049)		
size90 _{t-1} × adj-mertondd _{t-1}					0.194 ^{***}		
					(0.056)		
ewma-mertondd _{t-1}						-0.097 ^{***}	
						(0.021)	
size90 _{t-1} × ewma-mertondd _{t-1}						0.104 ^{***}	
						(0.034)	
dd-beta _{t-1}							0.142 [*]
							(0.076)
size90 _{t-1} × dd-beta _{t-1}							-0.295 ^{**}
							(0.131)
constant	3.306 ^{***}	2.533 ^{***}	1.517 [*]	-0.512	1.317	1.306	2.606 ^{***}
	(0.819)	(0.929)	(0.910)	(0.809)	(0.851)	(0.847)	(0.854)
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	39,125	37,856	39,125	39,125	39,125	38,344
R ²	0.457	0.465	0.429	0.492	0.433	0.425	0.438

PANEL B

VARIABLES	(1) spread	(2) spread	(3) spread
size90 _{t-1}	-0.435 (0.442)	0.226 (0.398)	0.055 (0.301)
financial _{t-1}	0.482 (0.598)	0.162 (0.407)	0.558* (0.313)
financial _{t-1} × size90 _{t-1}	-1.554** (0.746)	-1.445** (0.579)	0.721* (0.377)
mertondd _{t-1}	-0.241*** (0.046)		
size90 _{t-1} × mertondd _{t-1}	0.071 (0.063)		
financial _{t-1} × mertondd _{t-1}	-0.149 (0.091)		
financial _{t-1} × mertondd _{t-1} × size90 _{t-1}	0.259** (0.113)		
zscore _{t-1}		-0.172** (0.070)	
size90 _{t-1} × zscore _{t-1}		-0.112 (0.125)	
financial _{t-1} × zscore _{t-1}		-0.134 (0.101)	
financial _{t-1} × zscore _{t-1} × size90 _{t-1}		0.387** (0.171)	
volatility _{t-1}			8.170*** (0.824)
size90 _{t-1} × volatility _{t-1}			-0.175 (1.018)
financial _{t-1} × volatility _{t-1}			-2.740*** (1.057)
financial _{t-1} × volatility _{t-1} × size90 _{t-1}			-3.106** (1.310)
constant	-0.617 (0.750)	-1.642** (0.716)	-4.119*** (0.509)
Year FE	Y	Y	Y
Rating Dummies	Y	Y	Y
Controls	Y	Y	Y
Observations	104,127	101,944	104,127
R ²	0.459	0.439	0.548

PANEL B (cont'd)

VARIABLES	(4) spread	(5) spread	(6) spread
size90 _{t-1}	-0.513 (0.346)	-0.390 (0.280)	-0.211 (0.210)
financial _{t-1}	0.022 (0.500)	0.011 (0.391)	-0.540** (0.228)
financial _{t-1} × size90 _{t-1}	-0.994* (0.590)	-0.739 (0.476)	0.092 (0.241)
adj-mertondd _{t-1}	-0.142*** (0.036)		
size90 _{t-1} × adj-mertondd _{t-1}	0.072 (0.046)		
financial _{t-1} × adj-mertondd _{t-1}	-0.056 (0.066)		
financial _{t-1} × adj-mertondd _{t-1} × size90 _{t-1}	0.137* (0.077)		
ewma-merton _{t-1}		-0.065*** (0.016)	
size90 _{t-1} × ewma-merton _{t-1}		0.038 (0.025)	
financial _{t-1} × ewma-mertondd _{t-1}		-0.040 (0.032)	
financial _{t-1} × ewma-mertondd _{t-1} × size90 _{t-1}		0.069* (0.042)	
dd-beta _{t-1}			-0.080 (0.072)
size90 _{t-1} × dd-beta _{t-1}			0.141 (0.162)
financial _{t-1} × dd-beta _{t-1}			0.284** (0.114)
financial _{t-1} × dd-beta _{t-1} × size90 _{t-1}			-0.428* (0.225)
constant	-1.494** (0.745)	-1.781*** (0.672)	-2.510*** (0.662)
Year FE	Y	Y	Y
Rating Dummies	Y	Y	Y
Controls	Y	Y	Y
Observations	104,127	104,127	103,796
R ²	0.445	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 90th 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, $\Delta IPP_{i,t} = \alpha + \beta^1 \Delta s_{A_{i,t}} + \beta^2 TBTF_{i,t} + \beta^3 TBTF_{i,t} \times \Delta s_{A_{i,t}} + Year FE + \varepsilon_{i,t}$. ΔIPP 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) ΔIPP	(6) ΔIPP	(7) ΔIPP	(8) ΔIPP
$\Delta asset vol$	-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 ²	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 90th 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) mertondd	(2) mertondd	(3) mertondd	(4) 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	6.268*** (1.241)	6.324*** (1.053)	8.187*** (0.678)	9.083*** (0.714)
mb	0.088** (0.038)	0.066 (0.040)	0.008** (0.003)	0.007** (0.003)
std roa	-9.368** (4.466)	-11.392** (5.725)	-3.410*** (0.847)	-4.812*** (0.999)
leverage	-2.676*** (0.560)	-1.427** (0.599)	-3.295*** (0.305)	-3.100*** (0.311)
mismatch	-0.593** (0.281)	-0.606* (0.324)	-0.098 (0.132)	0.025 (0.145)
size _{t-1}	0.222*** (0.047)		0.508*** (0.031)	
size90 _{t-1}		0.066 (0.154)		1.021*** (0.133)
financial _{t-1}			2.247*** (0.515)	0.543*** (0.123)
financial _{t-1} × size _{t-1}			-0.257*** (0.052)	
financial _{t-1} × size90 _{t-1}				-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 ²	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 _{t-1}	-14.418*** (1.997)	-5.450 (3.829)	-4.093 (4.288)
roa _{t-1}	-55.024*** (10.843)	-42.518*** (11.292)	-46.346*** (11.410)
mb _{t-1}	0.419*** (0.105)	0.526*** (0.161)	0.465*** (0.164)
mismatch _{t-1}	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 _{t-1}	-0.171*** (0.040)	-0.155*** (0.046)	-0.178*** (0.059)
stand-alone rating _{t-1}	0.107* (0.055)		-0.164 (0.147)
issuer rating _{t-1}		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 ²	0.644	0.654	0.655

Panel B

VARIABLES	(1) issuer rating	(2) issuer rating	(3) stand-alone	(4) stand-alone
leverage _{t-1}	-19.374** (8.490)	-25.011*** (6.312)	-2.654 (5.209)	-3.474 (4.786)
roa	-32.744* (18.217)	-35.547 (21.865)	-23.599 (15.001)	-23.952 (15.519)
mb	-0.410* (0.220)	-0.137 (0.246)	-0.259* (0.130)	-0.214 (0.134)
mismatch _{t-1}	2.863** (1.337)	3.106** (1.281)	1.047 (0.676)	1.116* (0.642)
size _{t-1}	-0.753*** (0.151)		-0.130 (0.107)	
size90 _{t-1}		-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 ²	0.622	0.492	0.527	0.518

Table 7: Event Study

Regression results for the model $Spread_{i,b,t} = \alpha + \beta^1 post + \beta^2 TBTF_{i,t} \times post + \beta^3 Fincancial_{i,t} \times post + \beta^4 Risk_{i,t} \times post + \beta^5 TBTF_{i,t} \times Fincancial_{i,t}$

$\times post + \beta^6 TBTF_{i,t} \times Risk_{i,t} \times post + \beta^7 Fincancial_{i,t} \times Risk_{i,t} \times post + \beta^8 TBTF_{i,t} \times Fincancial_{i,t} \times Risk_{i,t} \times post + \beta^9 Macro\ Controls_t + Issue\ FE + \varepsilon_{i,b,t}$ 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 90th 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)	(2)	(3)	(4)
		size90 _{t-1} × post	× mertondd _{t-1} × post	× financial _{t-1} × post	× financial _{t-1} × mertondd _{t-1} × post
03/13/08	Bear Stearns bailout	-1.149*** (0.224)	0.251** (0.103)	-1.141*** (0.228)	0.401** (0.182)
07/11/08	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**	0.201	-0.748*	0.269

		(0.362)	(0.281)	(0.382)	(0.291)
11/13/08	Paulson indicates that TARP will be used to buy equity instead of troubled assets	-0.630**	0.925**	-0.614*	0.901**
		(0.272)	(0.403)	(0.316)	(0.429)
02/02/09	The Federal Reserve announces it is prepared to increase TALF to \$1 trillion	-0.031	0.102	-0.297*	0.462***
		(0.086)	(0.109)	(0.162)	(0.176)
09/15/08	Lehman Brothers files for bankruptcy	1.005***	-1.464***	1.086***	-1.437***
		(0.329)	(0.293)	(0.436)	(0.184)
06/29/10	The House and the Senate conference committees reconcile the Dodd-Frank bill	-0.034*	0.039*	-0.003	0.033
		(0.019)	(0.021)	(0.022)	(0.023)
07/21/10	President Obama signs Dodd-Frank into law	0.027*	-0.019	0.017	-0.016
		(0.016)	(0.014)	(0.019)	(0.015)
12/10/12	The FDIC and the Bank of England release a white paper and press release describing SPOE	0.037***	-0.028**	0.030**	-0.029**
		(0.012)	(0.014)	(0.014)	(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 (*Issue* \times *Trading Day FE*). Other control variables are described 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)	(2)	(3)	(4)
	spread	spread	spread	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)
ttm	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 \times post	0.134*** (0.022)	0.700** (0.259)	0.001 (0.065)	0.409** (0.129)
mertondd _{t-1} \times guarantee		0.887*** (0.220)		0.662*** (0.181)
mertondd _{t-1} \times guarantee \times 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 \times Trading Day FE	Y	Y	Y	Y
Event days	10	10	132	132
Observations	2,537	2,090	31,338	30,011

R^2

0.687

0.703

0.594

0.595

Table 9: Robustness Checks

Regression results for the model $Spread_{i,b,t} = \alpha + \beta^1 TBTF_{i,t-1} + \beta^2 Risk_{i,t-1} + \beta^3 Bond\ Controls_{i,b,t} + \beta^4 Firm\ Controls_{i,t-1} + \beta^5 Macro\ Controls_t + \beta^3 Bond\ Liquidity_{i,b,t} + Year\ FE + \varepsilon_{i,b,t}$ 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). A dummy variable is given a value of one or zero each month depending on the characteristics of the underlying bond. We then add up the dummy variables to compute an overall liquidity score. A dummy variable is assigned a value of one if i) the outstanding market value of a bond is larger than the median value of all bonds, ii) the age of a bond is less than the median age of all bonds, iii) the time to maturity of a bond is less than seven years, iv) the bond is rated AAA/AA. *turnover* is bond turnover computed using the past three months of trading data. This variable is computed using the TRACE database and is available only after 2003. All the variables are included in the regression but only the variables of interest are reported. In columns 3 to 6 we use two alternative measures of systemic importance (*TBTF*). *covar* is the Covar measure of Adrian and Brunnermeir (2011) described in detail in Appendix A. *srisk* is the systemic risk measure of Acharya et al. (2012) and Acharya et al. (2010a) described in detail in Appendix A. Variables are defined 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
mertondd _{t-1}	-0.263*** (0.019)	-0.252*** (0.019)	-0.282*** (0.060)	-0.263*** (0.059)	-0.396*** (0.093)	-0.356*** (0.092)
size90 _{t-1}	-0.168** (0.067)	-0.293** (0.145)			-1.913*** (0.634)	-1.552*** (0.573)
liquidity _{t-1}	-0.100*** (0.027)					
turnover _{t-1}		-0.073*** (0.020)				
covar _{t-1}			-9.316** (3.625)		-4.516 (4.099)	
srisk _{t-1}				-0.011** (0.005)		-0.006* (0.003)
size90 _{t-1} × mertondd _{t-1}					0.315*** (0.101)	0.254*** (0.095)
Constant	-0.665** (0.289)	1.889** (0.788)	4.365*** (1.105)	3.498*** (0.736)	3.112*** (0.854)	4.113*** (0.877)
Year FE	Y	Y	Y	Y	Y	Y
Rating FE	Y	Y	Y	Y	Y	Y
Controls	Y	Y	Y	Y	Y	Y
Observations	39,125	14,003	36,504	36,219	36,504	36,219
R ²	0.521	0.607	0.422	0.432	0.444	0.443

Appendix A: Variable Descriptions

Variable	Description
Bond characteristics	
<i>spread</i>	The difference between the yield on a firm's bond and the yield on a maturity-matched Treasury bond. Spread is in percentages.
<i>ttm</i>	Year to maturity.
<i>seniority</i>	Dummy variable indicating whether the bond is senior.
<i>age</i>	Age of the bond since issuance in years.
<i>puttable</i>	Dummy variable set equal to 1 if the bond is puttable.
<i>redeemable</i>	Dummy variable set equal to 1 if the bond is redeemable.
<i>exchangeable</i>	Dummy variable set equal to 1 if the bond is exchangeable.
<i>fixrate</i>	Dummy variable set equal to 1 if the bond has fixed rate coupons.
<i>guarantee</i>	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."
<i>liquidity</i>	Bond liquidity measure based on Longstaff et al. (2005). A dummy variable is set each month a value of one or zero depending on the characteristics of the underlying bond. We add up the dummy variables to determine an overall liquidity score. The first variable is used to measure general availability of the bond issue in the market. If the outstanding market value of a bond is larger than the median value of all bonds, then the dummy variable is assigned a value of one. The second variable is the age of the bond and parallels the notion of on-the-run and off-the-run bonds in Treasury markets, with on-the-run bonds being more liquid. If the age of a bond is less than the median age of all bonds then the dummy variable is assigned a value of one. The third variable is the time to maturity of the bond. It has been shown that there exist maturity clienteles for corporate bonds and that shorter-maturity corporate bonds tend to be more liquid than longer-maturity bonds. If the time to maturity of a bond is less than seven years then the dummy variable is assigned a value of one. The fourth variable is a dummy variable set equal to one if the bonds is rated AAA/AA. As Longstaff, Mithal and Neis (2005) show, highly rated bonds tend to be more marketable and liquid in times distress when there is a "flight to quality." The maximum liquidity value assigned to a bond is four and the minimum liquidity value is zero.
<i>turnover</i>	Bond turnover computed using the past three months of trading data. This variable is computed using the TRACE database and is available after 2003.
Firm characteristics	

<i>size</i>	Size of a financial institution defined as the log value of total assets.
<i>size90</i>	Dummy variable that equals 1 if an issuer's size is greater than the 90 th percentile of its distribution in that fiscal year and 0 otherwise.
<i>size60</i>	Dummy variable that equals 1 if an issuer's size is greater than the 60 th percentile of its distribution in that fiscal year but less than or equal to the 90 th percentile and 0 otherwise.
<i>size30</i>	Dummy variable that equals 1 if an issuer's size is greater than the 30 th percentile of its distribution in that fiscal year but less than or equal to the 60 th percentile and 0 otherwise.
<i>size_top_10</i>	Dummy variable that equals 1 if an issuer ranks in the top ten in terms of size in that fiscal year and 0 otherwise.
<i>financial</i>	Dummy variable that equals 1 if the company is a financial firm defined as having an SIC code starting with 6.
<i>bank dummy</i>	Dummy variable that takes on a value of one for firms with SIC codes that start with 60 and 61 and firms with SIC code 6712.
<i>insurance dummy</i>	Dummy variable that takes on a value of one for firms with SIC codes that start with 63 and 64.
<i>broker dummy</i>	Dummy variable that takes on a value of one for firms with SIC codes that start with 62.
<i>stand-alone rating</i>	Fitch individual rating, which is a number between 1 and 9, with 1 indicating the highest issue quality.
<i>issuer rating</i>	Fitch long term issuer rating, which is a number between 1 and 9, with 1 indicating the highest issue quality.
<i>covar</i>	Covar measure of systemic fragility, as described below.
<i>srisk</i>	Systemic risk based on expected capital shortfall, as described below.
<i>leverage</i>	Total liabilities divided by total assets.
<i>roa</i>	Return on assets, measured as net income divided by total assets.
<i>std roa</i>	Standard deviation of <i>roa</i> computed over 5 years.
<i>mb</i>	Market value of total equity divided by book value of total equity.
<i>mismatch</i>	Short-term debt minus cash divided by total liabilities.
<i>mertondd</i>	Merton's distance-to-default measure, as described below.
<i>adj-mertondd</i>	Merton's distance-to-default measure, calculated using scaled standard deviations for firms in the 90 th percentile in terms of size to match the average standard deviations of all other firms in a given month.
<i>ewma-mertondd</i>	Merton's distance-to-default measure, calculated using standard deviations computed using the exponentially weighted moving average method with weight factor of 0.94.
<i>dd-beta</i>	Merton's distance-to-default beta, obtained by 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 past 36 months of data. In computing <i>dd-beta</i> , we require the company to have at least 24 non-missing monthly changes in distance-to-default over the previous 36 months.
<i>zscore</i>	Z-score, calculated as the sum of <i>roa</i> and equity ratio (ratio of book equity to total assets), averaged over four years, divided by the standard deviation of <i>roa</i> over four years.
<i>volatility</i>	Stock return volatility computed using returns over the past 12 months.
<i>D/V</i>	Book value of debt divided by the market value of assets. Market value of assets is computed using the Merton model.
<i>IPP</i>	IPP is the fair insurance premium per dollar of liabilities computed following Merton (1977). The estimation is described in detail below.
<i>asset vol</i>	Volatility of market value of assets computed using the Merton model.

Macro controls

<i>mkt</i>	Market risk premium, computed as the CRSP value weighted stock return minus the risk free-rate.
<i>term</i>	Term structure premium, measured by the yield spread between long-term (10-year) Treasury bonds and short-term (three-month) Treasuries.
<i>def</i>	Default risk premium, measured by the yield spread between BAA-rated and AAA-rated corporate bonds.

Merton Measure of Credit Risk

We follow Campbell, Hilscher and Szilagyi (2008) and Hillegeist et al. (2004) in calculating Merton's (1974) distance-to-default. The market equity value of a company is modeled as a call option on the company's assets:

$$V_E = V_A e^{-dT} N(d_1) - X e^{-rT} N(d_2) + (1 - e^{-dT}) V_A$$
$$d_1 = \frac{\log\left(\frac{V_A}{X}\right) + \left(r - d + \frac{s_A^2}{2}\right) T}{s_A \sqrt{T}}; d_2 = d_1 - s_A \sqrt{T} \quad (\text{A1})$$

where V_E is the market value of a bank, V_A is the value of the bank's assets, X is the face value of debt maturing at time T , r is the risk-free rate, and d is the dividend rate expressed in terms of V_A . s_A is the volatility of the value of assets, which is related to equity volatility through the following equation:

$$s_E = \frac{V_A e^{-dT} N(d_1) s_A}{V_E} \quad (\text{A2})$$

We simultaneously solve equations (A1) and (A2) to find the values of V_A and s_A . We use the market value of equity for V_E and total liabilities to proxy for the face value of debt, X .³³ Since the accounting information is on an annual basis, we linearly interpolate the values for all dates over the period, using end of year values for accounting items. The interpolation method has the advantage of producing a smooth implied asset value process and avoids jumps in the implied default probabilities at year end. s_E is the standard deviation of daily equity returns over the past 12 months. In calculating standard deviation, we require the company to have at least 90 non-zero and non-missing returns over the previous 12 months. T equals one year, and r is the one-year Treasury bill rate, which we take to be the risk-free rate. The dividend rate, d , is the sum of the prior year's common and preferred dividends divided by the market value of assets. We use the Newton method to simultaneously solve the two equations above. For starting values for the unknown variables, we use $V_A = V_E + X$ and $s_A = s_E V_E / (V_E + X)$.

³³ For financial firms, we have found similar results using short-term debt plus the currently due portion of long-term liabilities plus demand deposits as the default barrier.

After we determine asset values V_A , we follow Campbell, Hilscher and Szilagyi (2008) and assign asset return m to be equal to the equity premium (6%).³⁴ Merton's (1974) distance-to-default (dd) is finally computed as:

$$Mertondd = \frac{\log\left(\frac{V_A}{X}\right) + \left(m - d - \frac{s_A^2}{2}\right)T}{s_A\sqrt{T}} \quad (A3)$$

The default probability is the normal transform of the distance-to-default measure, defined as:

$$PD = F(-MertonDD).$$

Covar Measure of Systemic Fragility

Following Adrian and Brunnermeier (2011), we compute a conditional value-at-risk measure (*covar*) for each of the financial institutions in our sample using quantile regression. *Covar* is the value-at-risk (Var) of the financial system conditional on institutions being under distress. A financial institution's contribution to systemic risk is the difference between *covar* conditional on the institution being under distress and the *covar* in the normal state of the institution. Following Adrian and Brunnermeier (2011), we compute a time-series of *Covar* measures for each bank using quantile regressions and a set of macro state variables. We run the following quantile regressions over the sample period:

$$\begin{aligned} \Delta BankDD_{i,t} &= \alpha_i + \gamma_i M_{t-1} + \varepsilon_{i,t} \\ \Delta SystemDD_t &= \alpha_{system|i} + \beta_{system|i} \Delta BankDD_{i,t} + \gamma_{system|i} M_{t-1} + \varepsilon_{system|i,t} \end{aligned} \quad (A4)$$

where $\Delta BankDD_{i,t}$ is the change in the Merton (1974) distance-to-default variable for bank i in week t and $\Delta SystemDD_t$ is similarly the change in the value-weighted Merton distance-to-default variable for

³⁴ We obtain similar distance-to-default values if we compute asset returns (V_A), as $\max\left(\frac{V_{A,t}}{V_{A,t-1}} - 1, r\right)$, following Hillegeist et al. (2004).

all financial firms in the sample. M_{t-1} are lagged state variables and include the change in the term spread (*term*), the change in the default spread (*def*), the CBOE implied volatility index (*vix*), the S&P 500 return (*spret*), and the change in the 3-month T-bill rate (*rate*). The *covar* variable is then computed as the change in the Var of the system when the institution is at the q^{th} percentile (or when the institution is in distress) minus the Var of the system when the institution is at the 50% percentile:

$$\Delta CovarSystem_t^q = \hat{\beta}_{system|i}^q \left(\Delta \widehat{BankDD}_{i,t}^q - \Delta \widehat{BankDD}_{i,t}^{50\%} \right) \quad (A5)$$

Finally, we invert the *covar* variable, so that higher values of *covar* indicate greater systemic risk.

SRISK Measure of Systemic Expected Shortfall

The second systemic risk measure we use is based on the expected capital shortfall framework developed by Acharya, Engle and Richardson (2012) and Acharya et al. (2010a). The systemic expected shortfall of an institution describes the capital shortage a financial firm would experience in case of a systemic event. The capital short fall depends on the firm's leverage and equity loss conditional on an aggregate market decline:

$$\begin{aligned} SRISK_t^i &= E((k(Debt + Equity) - Equity|Crisis)) \\ &= k(Debt_t^i) - (1 - k)(1 - MES_t^i)Equity_t^i \end{aligned} \quad (A6)$$

Marginal Expected Shortfall (MES_t^i) of a firm, i , is the expected loss an equity investor in a financial firm would experience if the market declined substantially. Following Acharya et al. (2010a), we use the bivariate daily time series model of equity returns of firm i , along with the aggregate market index and simulate returns six months into the future. The simulation allows volatilities and correlations to change over time and samples from the empirical distribution such that empirical tail dependence is maintained. Crisis is defined as the aggregate index falling by 40% over the next six months. Marginal expected shortfall is the equity decline in such a scenario.

Measure of Risk-Shifting

We follow Bushman and Williams (2012) and Hovakimian and Kane (2000) and use the Merton (1974) contingent claim framework to calculate asset return volatility (s_A) and the fair value of the insurance put-option per dollar of liabilities (IPP). IPP is computed as:

$$IPP = N\left(\frac{\log\left(\frac{X}{V_A}\right) + \frac{s_A^2 T}{2}}{s_A \sqrt{T}}\right) - \left(\frac{V_A}{X}\right) N\left(\frac{\log\left(\frac{X}{V_A}\right) - \frac{s_A^2 T}{2}}{s_A \sqrt{T}}\right) \quad (A7)$$

where V_A is the value of the bank's assets, X is the face value of debt maturing at time T , and s_A is the volatility of the market value of bank assets. V_A and s_A are computed using Merton's (1974) model.

Appendix B. Additional Results

Table B1: Impact of Dodd-Frank

Regression results for the $\text{modelspread} = \alpha + \beta^1 \text{post} + \beta^2 \text{TBTF}_{i,t} \times \text{post} + \beta^3 \text{mertondd}_{i,t} \times \text{post} + \beta^4 \text{TBTF}_{i,t} \times \text{mertondd}_{i,t} \times \text{post} + \beta^5 \text{Macro Controls}_t + \text{Issuer FE} + \varepsilon_{i,b,t}$ are reported in this table. 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 90th percentile. *mertondd* is Merton's (1974) distance-to-default measure, calculated using firm-level financial and stock return data, as described in Appendix A. The event date is June 29, 2010 (Dodd-Frank). The variable *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 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
ttm	0.031* (0.018)	0.031* (0.018)
seniority	-0.213 (0.203)	-0.212 (0.204)
leverage _{t-1}	4.951*** (1.568)	4.425*** (1.343)
roa _{t-1}	-2.395 (4.138)	-2.738 (3.517)
mb _{t-1}	0.059 (0.145)	0.244 (0.173)
mismatch _{t-1}	-1.705*** (0.592)	-0.993 (0.842)
def	0.512* (0.277)	0.547* (0.280)
term	-0.130 (0.102)	-0.124 (0.102)
mkt	2.377 (3.406)	2.481 (3.427)
mertondd _{t-1}	-0.012 (0.111)	-0.266 (0.179)
size90 _{t-1}	-0.722*** (0.130)	-0.499** (0.191)
post	-0.225** (0.102)	-0.591*** (0.217)
size90 _{t-1} * post	0.077 (0.094)	0.550* (0.276)
mertondd _{t-1} * post		0.237* (0.123)
size90 _{t-1} * mertondd _{t-1} * post		-0.370* (0.187)
Constant	1.939** (0.755)	2.130*** (0.701)
Firm FE	Y	Y

Year FE	Y	Y
Rating Dummies	Y	Y
Observations	1,810	1,810
R ²	0.547	0.548

Table BII: FDIC Guarantee Estimation

Regression results for the model $spread_{i,b,t} = \alpha + \beta^1 Bond\ Controls_{i,b,t} + \beta^2 guarantee_{i,t-1} + Firm\ FE / Firm\ FE \times Trading\ Day\ FE + \varepsilon_{i,b,t}$ are reported in this table. The sample includes financial institutions that issued bonds under the Temporary Liquidity Guarantee Program. The time period is from December 10, 2008 to February 3, 2012. *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. We run three different specifications. Columns 1 and 2 report results without any fixed effects. Column 3 reports results using firm fixed effects (*Firm FE*). Column 4 reports results using firm-trading day fixed effects (*Firm×Trading day FE*). 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
guarantee	-2.324 ^{***} (0.244)	-2.038 ^{***} (0.321)	-2.167 ^{***} (0.259)	-2.082 ^{***} (0.248)
fixed rate		-1.646 ^{***} (0.350)	-1.059 ^{***} (0.193)	-1.117 ^{***} (0.162)
seniority		-0.536 ^{**} (0.180)	-0.664 ^{***} (0.147)	-0.580 ^{***} (0.140)
puttable		0.777 [*] (0.357)	0.243 (0.210)	0.317 ^{**} (0.131)
exchangeable		5.406 ^{***} (0.511)	5.211 ^{***} (0.499)	5.118 ^{***} (0.415)
redeemable		0.480 (0.299)	0.095 (0.182)	-0.069 (0.139)
ttm		0.069 ^{***} (0.021)	0.059 ^{***} (0.014)	0.045 ^{***} (0.012)
age		-0.051 ^{**} (0.018)	-0.054 ^{***} (0.011)	-0.020 ^{***} (0.005)
constant	0.301 ^{***} (0.013)	2.316 ^{***} (0.348)	1.945 ^{***} (0.290)	1.995 ^{***} (0.245)
Specification	OLS	OLS	Firm FE	Firm×Trading
Observations	90,528	90,528	90,528	90,528
R ²	0.233	0.275	0.329	0.782