

## Discussion: RegTech Charoenwong, Kowaleski, Kwan, Sutherland

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### Summary

#### **RegTech:**

• Compliance-driven investments in technology

#### **Research question:**

• Understanding firms' RegTech investments and their effects on operations and market structure.

#### **Challenges:**

- Firms' adoption of technology is endogenously driven by factors that may affect firm outcomes
  - e.g., Zhang (2019 JF) shows that firms tend to adopt automation to replace routine labor in <u>bad times</u>: *the opportunity cost of operation restructuring is low*

## This paper

#### **Research Design:**

- Focus on RegTech adoption by Brokers and Dealers (BDs)
- Explore a regulatory shock in 2013-14 mandating stringent internal control attestation
  - Treated: carrying brokers and dealers
  - Control: non-carrying brokers and dealers

#### Main Findings:

- 1. <u>First pass:</u> Carry BDs significantly invest in regulation-related technologies (e.g., ERP)
- 2. <u>Key mechanism:</u> Reg-related investments complement non-reg-related expenditures
- 3. <u>Outcome:</u> Carry BDs exhibit reduced customer complaints and employee misconduct

**Takeaway:** RegTech investments boost noncompliance functions through tech adoption.

## Comment: Effects of Regulation or RegTech?

- Effects of Regulation: Regulatory mandates Firm outcomes
- The empirical design primarily focuses on a **regulatory shock** 
  - i.e., How do BDs treated by regulation differ from BDs not treated by regulation?

#### Comments:

- Treated BDs may have differential responses to regulation: Some invest in RegTech, while others resort to the old compliance methods.
- Do we observe BDs invested in RegTech generate better outcomes than those resorted to old compliance methods?

### Comment: Exclusion Restriction of IVs

- One way to think of the empirical design is using the regulatory shock as an IV for RegTech.
- The authors performed this IV test. Great!

#### Comments:

- A common hurdle is the <u>exclusion restriction</u> of IVs
- Does IV (regulatory treatment) reduce customer complaints and employee misconduct only through RegTech investment, or through other channels as well?
  - Many provisions of Dodd-Frank became effective in 2014. Can some provisions differentially treat brokers and dealers with custody assets?

## More Broadly on Using a Single Regulatory Shock

**Regulatory compliance is an ultra-complicated matter:** 

- Firms may be subject to regulations from multiple agencies (Trebbi and Zhang (2022))
  - Mapping between firms and agencies is not 1-to-1

- Firms may face differential regulatory enforcement (Gulen and Myers (2022))
  - Regulators' enforcement may vary by location, firm size, etc.

- Firms may also respond to regulatory compliance differentially
  - Depending on firms' risk-taking behavior (Gary Becker, Stiglitz (2009))

# A much bigger regulatory spending is compliancerelated **labor spending**

#### Manufacturing: Labor accounts for 68%

Chart 15. Estimates of Direct Regulatory Costs on Manufacturers (in Billions of 2014 Dollars)



#### **Finance: Labor accounts for 93%**

Figure 3b Percent of Total Compliance-Related Spending				
	Staff- <u>Related</u> <sup>1</sup>	Out-of- <u>Pocket</u>	<u>Capital</u>	<u>Total</u>
All Firms	<mark>93.9</mark>	2.8	3.3	100.0
Large Firms	<mark>94.3</mark>	2.1	3.6	100.0
Mid-sized Firms	<mark>96.1</mark>	3.1	0.8	100.0
Small Firms	<mark>81.5</mark>	13.4	5.1	100.0

### Measuring Firms' Regulatory Compliance via Labor

### Trebbi and Zhang (2022)

- Measure: percentage of firms' labor spending on regulation-related tasks
- U.S. Bureau of Labor Statistics Microdata of 1.2 million establishments with their occupation composition
- Mid-size firms pay the highest percentage regulatory spending



### Conclusion

### **Fascinating study**

- First stab at RegTech and its effects on firms
- Many interesting findings
- More study needed to understand the overall regulatory environment that firms face

### Thank you!

