

Opening Remarks

Robert G. Pickel

Executive Vice Chairman

ISDA

9:00am Thursday, April 14, 2011

OTC Derivatives Market Structure

Characteristic

Trading Counterparties

Retail Participation

Daily Trades

Tradable Instruments

Trade Size

Market Structure

OTC Swaps

< 1,000

None

< 20,000

>> 100,000

Very Large

Bilateral (OTC)

Listed Futures

>> 100,000

Significant

> 1,000,000

< 1,000

Small

Exchange



OTC Derivatives Market Structure: IRS

5500 Daily Trades

- 3600 swaps
- 1900 caps, floors, etc.

1200 USD and 830 EURO IRS are traded daily

Less than 50% of daily swaps trading is standardized

• Most liquid standardized swap (10y USD) trades 200x per day



OTC Derivatives Market Structure: CDS

6700 Daily Trades

- 4900 single-names
- 1800 indices

13 out of 3000 single-names trade 20 or more contracts per day

• 99% of single-name CDS trade less than 20x per day

5 CDS indices comprise 60% of daily CDS index trading



Trading Facility Issues

OTC derivatives markets distinctly different than futures market

Regulation should not reduce liquidity

Why should trading facilities be mandatory for cleared trades?

 Clearing will lead to voluntary development and usage of trading facilities

Real-time reporting should be done with care

- Effect on equity markets
- High speed trading

Need to preserve market-making/client involvement for large trades

Phase-in of trading facility requirements needed



Trading Facility Issues

Current pricing extremely competitive

Recent blind test of IRS market

• Executable quotes were 0.001% over mid-market

Benefits

- Participants should be able to decide when and if using trading facilities provides benefits.
- Mandate locks in one way of trading, reducing flexibility.

Costs

- Higher prices on block trades
- Cost of linking to facilities
- Start-up and operating costs of facilities
- Regulatory costs



Market Structure Issues

- "All standardized OTC derivative contracts should be traded on exchanges or electronic trading platforms, where appropriate"
 - G20, 2009
- "It is appropriate to trade standardised derivatives contracts with a suitable degree of liquidity on "exchanges or electronic trading platforms," provided that a flexible approach encompassing a range of platforms... for derivatives trading is taken"
 - IOSCO, February 2011
- "Our idea [in Europe] is not to disturb existing business models for trading of OTC derivatives"
 - Maria Velentza, head of the securities market unit at the Commission, March 2011



Safe, Efficient Markets