

# Economic Institutions as Matching Markets

Jan Eeckhout and Kaivan Munshi  
UPenn                      Brown

April 29, 2005  
Stanford

# Eluding Regulation: The Response of Financial Institutions in India

Jan Eeckhout and Kaivan Munshi  
UPenn                      Brown

April 29, 2005  
Stanford

# Motivation

The issue: Regulation

- Often benefits special interest groups
- Individuals respond by "voting with their feet"
- But difficult to observe and hard to measure

# Motivation

**The issue:** Regulation

- Often benefits special interest groups
- Individuals respond by "voting with their feet"
- But difficult to observe and hard to measure

**This paper:** Institutional response

- Special setting in which response to regulation can be observed
- Financial intermediation, Chit Funds in Chennai (Madras)

# Motivation

## The issue: Regulation

- Often benefits special interest groups
- Individuals respond by "voting with their feet"
- But difficult to observe and hard to measure

## This paper: Institutional response

- Special setting in which response to regulation can be observed
- Financial intermediation, Chit Funds in Chennai (Madras)

## Starting point: nationalization of Indian banking in 1970

- Below-market interest rates and credit is rationed
- The cost: mainly borne by small investors and households
- Benefits money lenders, landowners (see Rajan and Zingales)

## Chit funds: Traditional Micro Finance

- Small, rural, community-based (Grameen, Rosca)
- Allow individuals to elude the regulation
- Savings scheme with randomly selected winner
- Besley e.a.: gains from trade if complementarity, indivisibility

### Chit funds: Traditional Micro Finance

- Small, rural, community-based (Grameen, Rosca)
- Allow individuals to elude the regulation
- Savings scheme with randomly selected winner
- Besley e.a.: gains from trade if complementarity, indivisibility

### Chit funds: Commercial Chit Funds

- Develop into commercial chit funds: large, urban, auctions
- Rather: financial intermediary for borrowers and lenders
- Operated by a company: fee and collateral
- They (imperfectly) replicate the market
- Default rates are very low
- Commercial chit funds become very big: 25% of bank deposits in Tamil Nadu, Kerala (1993).

## Regulation: Chit Fund Act

- Compete with banking system; banks lobby for regulation
- The Reserve Bank India (RBI) passed the 1982 Chit fund act
- Bids capped: After appeal, upheld in 1993 by Supreme Court
- We evaluate the response to this regulation: voting with feet



## Regulation: Chit Fund Act

- Compete with banking system; banks lobby for regulation
- The Reserve Bank India (RBI) passed the 1982 Chit fund act
- Bids capped: After appeal, upheld in 1993 by Supreme Court
- We evaluate the response to this regulation: voting with feet

## Data

- All auctions in largest Chit Fund company, based in Chennai
- Information on bids, income
- Identification of "corporate" and "private" subscribers

## Regulation: Chit Fund Act

- Compete with banking system; banks lobby for regulation
- The Reserve Bank India (RBI) passed the 1982 Chit fund act
- Bids capped: After appeal, upheld in 1993 by Supreme Court
- We evaluate the response to this regulation: voting with feet

## Data

- All auctions in largest Chit Fund company, based in Chennai
- Information on bids, income
- Identification of "corporate" and "private" subscribers

## Main findings

- we measure how the composition changes to new equilibrium
- equilibrating force: proportion of borrowers and lenders
- remarkable, given the absence of participation prices
- adjustment takes 1 year
- calculate implicit interest rate, a measure of welfare effects

# Scope of the Paper

Applied Theory: provide a simple theory that is consistent with the observed institutional response to regulation;

Limitations of the analysis:

1. the model is highly stylized; in particular, the allocation procedure (auction) within the chit fund is simplified
2. empirically, we do not provide a structural analysis of the bidding (plans for future); build a theoretical framework that is consistent with the empirically observed institutional response

# A Simple Model of Chit Funds

Two types  $\bar{\gamma}, \underline{\gamma}$  with investment opportunities of value  $1 + \gamma$

Time  $t$  is discrete; discount factor  $\delta$

Chit fund  $\langle N, v, p \rangle$  (duration, contribution, proportion high types)

Allocation of funds based on second price sealed bid auction;  
only "losers" bid; proceeds of bid distributed among losers

Two stages:

Stage 1 - endogenous matching into different chit funds  $\langle N, p, v \rangle$   
(determines # high types  $p$ )

Stage 2 - funds are allocated in each period, given  $p$

## Stage 2: Bidding

High type's payoff for  $t \leq pN$

$$\begin{aligned} \bar{V}_t &= \frac{1}{pN - t + 1} (\bar{V}_N - \bar{b}_t) \\ &\quad + \left(1 - \frac{1}{pN - t + 1}\right) \left(\delta \bar{V}_{t+1} + \frac{1}{N - t} \bar{b}_t\right) \end{aligned}$$

$$\bar{V}_N = Nv(1 + \bar{\gamma}) \text{ and } \bar{b}_t = \frac{N-t}{N-t+1} \bar{V}_N (1 - \delta \bar{V}_{t+1})$$

$$\bar{V}_t = \bar{V}_N - \bar{b}_t = \delta \bar{V}_{t+1} + \frac{1}{N-t} \bar{b}_t.$$

Low type's payoff

$$\underline{V}_t = \delta \underline{V}_{t+1} + \frac{1}{N-t} \bar{b}_t.$$

$$\Delta V_t = \delta \Delta V_{t+1} \longrightarrow \Delta V_1 = \delta^{pN-1} \Delta V_{pN}.$$

For  $t = pN$ , high type wins for sure

$$\bar{V}_t = \bar{V}_N - \underline{b}_t$$

$$\underline{V}_t = \delta \underline{V}_{t+1} + \frac{1}{N-t} \bar{b}_t = \underline{V}_N - \underline{b}_t$$

$$\underline{b}_t = \frac{N-t}{N-t+1} (\underline{V}_N - \delta \underline{V}_{t+1}).$$

$$\Delta V_{pN} = \Delta V_N$$

Difference in high and low type's valuation:

$$\Delta V_1(N, p) = \delta^{pN-1} \Delta V_N$$

where  $\Delta V_N = Nv [\bar{\gamma} - \underline{\gamma}] = Nv \Delta \gamma$ .

## Properties of Chit fund Payoffs

The normalized continuation payoff of participation in a chit fund  $\langle N, p, v \rangle$  is

$$\Delta W(\gamma, N, p) = \Delta V_1(\gamma, N, p) [1 + \delta^N + \delta^{2N} + \dots] = \frac{\delta^{pN-1} N v \Delta \gamma}{1 - \delta^N}.$$

Lemma 1:

$$\frac{d \Delta W(N, p)}{dp} < 0$$

Lemma 2: For sufficiently impatient participants

$$\frac{d \Delta W(N, p)}{dN} < 0.$$

# Stage 1: Matching

Given menu of chit funds, indifference between chit funds

$$W(\gamma, N_i, p(N_i)) = W(\gamma, N_j, p(N_j)), \forall \gamma, \forall i \neq j$$

which implies

$$\Delta W(N_i, p(N_i)) = \Delta W(N_j, p(N_j)), \forall i \neq j.$$

In addition, the beliefs  $p_i$  in each chit fund must be consistent with the initial distribution  $\mu$

$$\sum_i n_i p(N_i) N_i = \mu \sum_i n_i N_i$$

where the measure of groups of type  $i$  is  $n_i$  and the total measure of participants is  $n$  such that  $\sum_i n_i N_i = n$ .



Proposition 1. (Equilibrium Sorting) Consider any two chit funds  $i, j$  with  $N_i < N_j$  and sufficiently patient participants. Then the matching equilibrium implies  $p(N_i) > p(N_j)$ .

# The Impact of Regulation and the Change in Composition

Lemma 3: Consider the case in which high bids are constrained, while low bids are not. Then the difference in (normalized) payoffs between high types and low types increases under the constraint, for a fixed  $p$  and  $N$ .

Proposition 3. The proportion of high types will increase more in the constrained groups than in the unconstrained groups.

# Testing the Theory: the Data

The data, from Shriram Chits and Investments Pvt. Ltd

1. *all* winning bids one year before/after 30% cap (Sep 30 1993)

between October 1, 1992 and September 30, 1994 (we refer to 1993 and 1994 respectively)

78,000 individuals participated

2. income information for a limited number of subscribers (21,906 subscribers - 25% of the full sample)

3. aggregate break down by groups

A wide range of value-duration combinations is offered: classification of groups (both  $Nv$  and  $v$ ) – [Table 1](#)

**Table 1: Classification of Groups**

Groups divided by:		chit value			monthly contribution		
		Low (1)	Medium (2)	High (3)	Low (4)	Medium (5)	High (6)
<u>Duration</u>							
20 months	SHORT	17.42	3.35	5.79	--	23.29	7.02
25 months		8.51	8.77	17.38	10.25	--	27.41
30 months		--	49.29	5.79	--	40.85	14.47
40 months	LONG	73.87	24.77	18.90	88.93	23.41	13.60
50 months		0.20	0.90	38.11	0.82	0.24	27.41
60 months		--	12.90	10.67	--	12.20	7.68
100 months		--	--	3.35	--	--	2.41
Total		100.00	100.00	100.00	100.00	100.00	100.00
Total no. of groups		1022	775	328	849	820	456

Note: Chit value is the product of the monthly contribution and the group duration (in months).

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>1000.

Duration: Long >=40 months.

A wide range of value-duration combinations is offered: classification of groups (both  $Nv$  and  $v$ ) – [Table 1](#)

Identifying assumption: no change in characteristics of participants. Compare income distributions in 1993-1994 – [Table 2](#)

**Table 2: Description of Participants**

Groups partitioned by:	chit value						monthly contribution					
	Low		Medium		High		Low		Medium		High	
Chit value/ contribution:	1993	1994	1993	1994	1993	1994	1993	1994	1993	1994	1993	1994
Year:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
<b>A. Income Distribution (private subscribers)</b>												
Mean	2.90	2.98	3.66	3.66	4.84	7.59	2.88	2.96	3.60	3.53	4.76	7.05
(standard deviation)	(2.70)	(3.06)	(4.79)	(3.00)	(9.12)	(35.94)	(2.75)	(2.98)	(4.70)	(2.54)	(8.80)	(32.92)
0.10 quantile	1.14	1.12	1.52	1.55	1.86	1.94	1.15	1.10	1.50	1.50	1.87	1.90
0.25 quantile	1.63	1.70	2.23	2.24	2.58	2.71	1.62	1.66	2.20	2.16	2.52	2.66
0.50 quantile	2.47	2.50	3.00	3.03	3.55	3.83	2.44	2.48	3.00	3.00	3.52	3.74
0.75 quantile	3.50	3.50	4.10	4.33	5.00	5.25	3.47	3.46	4.05	4.21	5.00	5.14
0.90 quantile	4.90	5.00	5.79	6.00	7.35	8.00	4.85	5.00	5.68	5.93	7.05	7.90
<b>B. Proportion of corporate subscribers</b>												
	0.17	0.23	0.15	0.20	0.12	0.24	0.17	0.23	0.15	0.20	0.13	0.23

Note: Chit value is the product of the monthly contribution and group duration (in months).

Income is measured in thousands of Rs. per month.

Statistics in Panel A are computed for private subscribers only.

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>1000.

A wide range of value-duration combinations is offered: classification of groups (both  $Nv$  and  $v$ ) – [Table 1](#)

Identifying assumption: no change in characteristics of participants. Compare income distributions in 1993-1994 – [Table 2](#)

Stability of income distribution seems to justify the use of chit value as criterion for classifying the groups

We use the "corporate subscribers" to classify ex ante characteristics of high types (i.e. borrowers). In the data: they win early – [Table 3](#)



**Table 3: Timing of Winning Bids by Type of Participant**

Dependent variable:	Timing					
	Low		Medium		High	
Chit value/ contribution:	1993	1994	1993	1994	1993	1994
Year:	(1)	(2)	(3)	(4)	(5)	(6)

Panel A: Groups partitioned by chit value

Corporate subscriber	-0.124 (0.005)	-0.124 (0.006)	-0.105 (0.007)	-0.144 (0.006)	-0.151 (0.010)	-0.118 (0.008)
Constant	0.535 (0.002)	0.543 (0.003)	0.530 (0.003)	0.543 (0.003)	0.529 (0.003)	0.541 (0.004)
Number of observations	21,400	14,635	14,300	13,411	7,555	6,750

Panel B: Groups partitioned by contribution

Corporate subscriber	-0.122 (0.005)	-0.117 (0.006)	-0.114 (0.007)	-0.147 (0.006)	-0.134 (0.009)	-0.126 (0.007)
Constant	0.534 (0.002)	0.540 (0.003)	0.532 (0.003)	0.544 (0.003)	0.529 (0.003)	0.543 (0.003)
Number of observations	19,910	12,815	14,330	13,321	9,015	8,660

Note: Timing is measured as the winning month divided by the total duration of the group.

Corporate subscriber equals one if finance company, zero otherwise.

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>1000.

The individual subscriber is the unit of observation.

Standard errors in parentheses.

## Sorting in 1993

Theory predicts a systematic relationship between  $p$  and  $N$ . Short duration funds have a higher proportion of "corporate subscribers" (borrowers) – [Table 4](#)

Larger coefficient on higher value funds

**Table 4: Matching into Groups (1993)**

Dependent variable: Groups partitioned by: Chit value/ contribution:	Proportion of corporate subscribers					
	chit value			monthly contribution		
	Low	Medium	High	Low	Medium	High
	(1)	(2)	(3)	(4)	(5)	(6)
<u>A. Duration measured by a binary variable</u>						
Long duration dummy	-0.007 (0.008)	-0.014 (0.009)	-0.098 (0.014)	-0.018 (0.012)	-0.024 (0.010)	-0.063 (0.011)
Constant	0.179 (0.007)	0.141 (0.005)	0.208 (0.013)	0.190 (0.012)	0.150 (0.006)	0.173 (0.009)
Number of observations	594	337	161	512	363	217
<u>B. Duration measured as a continuous variable (in years)</u>						
Group duration	-0.004 (0.005)	-0.014 (0.009)	-0.015 (0.004)	-0.016 (0.010)	-0.026 (0.008)	-0.014 (0.004)
Constant	0.185 (0.017)	0.173 (0.024)	0.191 (0.018)	0.227 (0.031)	0.210 (0.020)	0.185 (0.014)
Number of observations	594	337	161	512	363	217

Note: Long duration dummy equals one if the group runs for at least 40 months, zero otherwise.

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>1000.

Regressions use 1993 data only and the group is the unit of observation.

Standard errors in parentheses.

# The Bids Before and After

Normalized bids are higher in long duration groups – [Table A3](#)

**Table A3: Bids within the Group**

Dependent variable: Contribution: Duration:	Normalized bid					
	Low		Medium		High	
	Short	Long	Short	Long	Short	Long
	(1)	(2)	(3)	(4)	(5)	(6)
Period 1	0.275 (0.004)	<b>0.370</b> (0.001)	<b>0.328</b> (0.002)	<b>0.464</b> (0.002)	<b>0.337</b> (0.003)	<b>0.527</b> (0.002)
Period 2	0.223 (0.003)	0.312 (0.001)	0.246 (0.001)	<b>0.368</b> (0.002)	0.254 (0.002)	<b>0.418</b> (0.002)
Period 3	0.156 (0.003)	0.221 (0.001)	0.161 (0.001)	0.275 (0.002)	0.174 (0.002)	0.304 (0.002)
Period 4	0.097 (0.003)	0.118 (0.001)	0.095 (0.001)	0.181 (0.002)	0.110 (0.002)	0.197 (0.002)
Period 5	0.063 (0.003)	0.065 (0.001)	0.063 (0.001)	0.077 (0.002)	0.065 (0.002)	0.085 (0.002)
Period 1 * 1994 dummy	0.003 (0.005)	<b>-0.077</b> (0.001)	<b>-0.043</b> (0.002)	<b>-0.167</b> (0.003)	<b>-0.046</b> (0.003)	<b>-0.224</b> (0.003)
Period 2 * 1994 dummy	0.020 (0.004)	-0.041 (0.001)	-0.005 (0.002)	<b>-0.081</b> (0.003)	0.003 (0.003)	<b>-0.123</b> (0.003)
Period 3 * 1994 dummy	0.003 (0.004)	-0.002 (0.001)	-0.008 (0.002)	-0.016 (0.003)	0.002 (0.003)	-0.031 (0.003)
Period 4 * 1994 dummy	-0.009 (0.004)	0.006 (0.001)	-0.008 (0.002)	-0.002 (0.003)	-0.007 (0.003)	-0.009 (0.003)
Period 5 * 1994 dummy	-0.010 (0.004)	-0.009 (0.001)	-0.010 (0.002)	-0.009 (0.002)	-0.009 (0.002)	-0.014 (0.003)
Number of observations	2088	29788	13344	13487	5522	11697

Note: Normalized bid is measured as the bid amount divided by the chit value.

Short duration groups last for less than 40 months, Long duration groups last for 40 months or more.

Each group is divided into 5 equal periods: Period 1- Period 5, covering its entire duration in sequence.

Contribution: Low if contribution < 500/month, Medium if contribution 500-1000, High if contribution ≥ 1000.

Bold face coefficients highlight bids greater than 0.3 in Rows 1-5 and the change in those bids in Rows 6-10.

Standard errors in parentheses.

# The Bids Before and After

Normalized bids are higher in long duration groups – [Table A3](#)

The 30% cap in 1994 forces the highest bids down

See also the nonparametric kernel estimates of the bid regression  
– [Figures 1-3](#)

Figure 1: Bids - Low Monthly Contribution

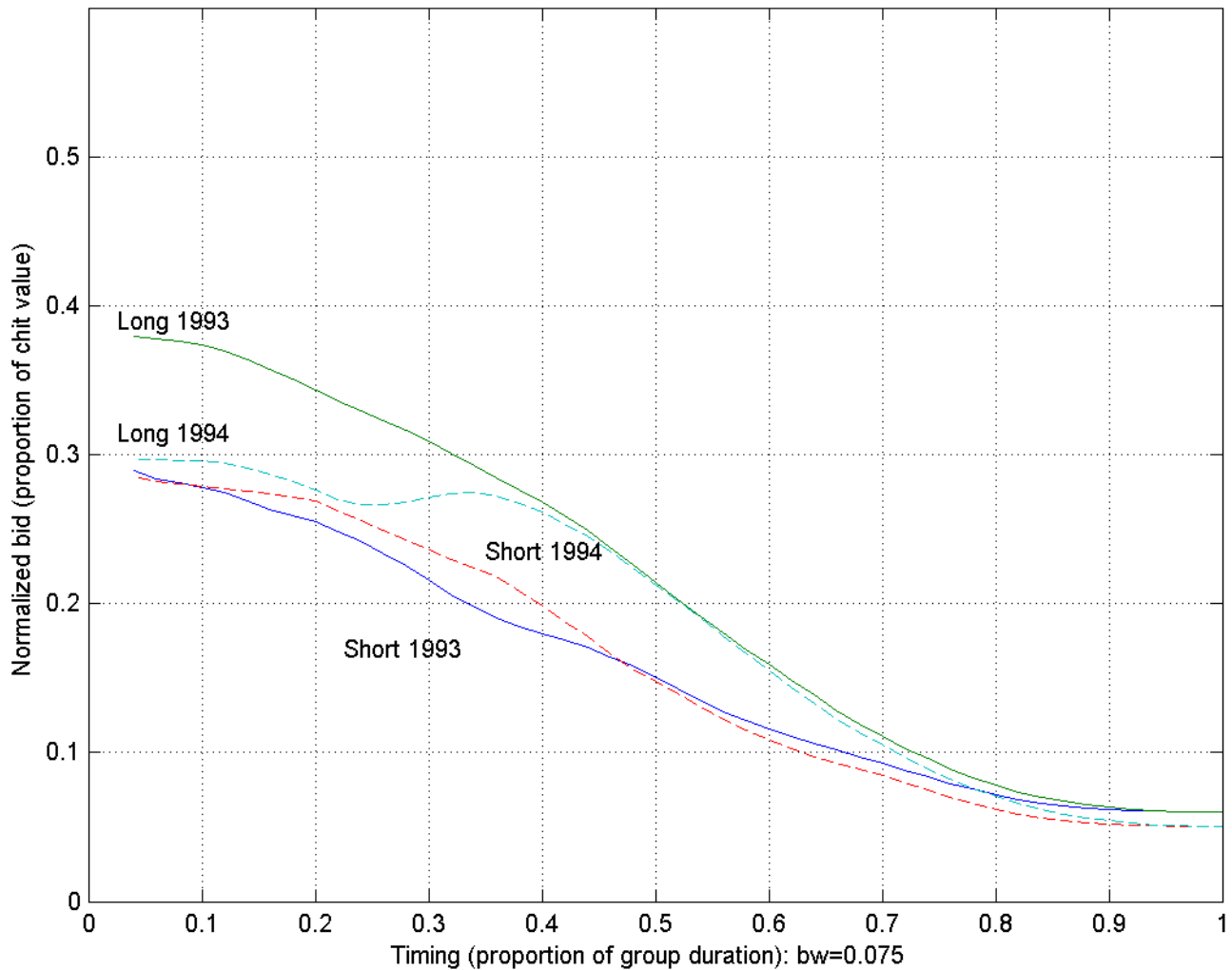


Figure 2: Bids - Medium Monthly Contribution

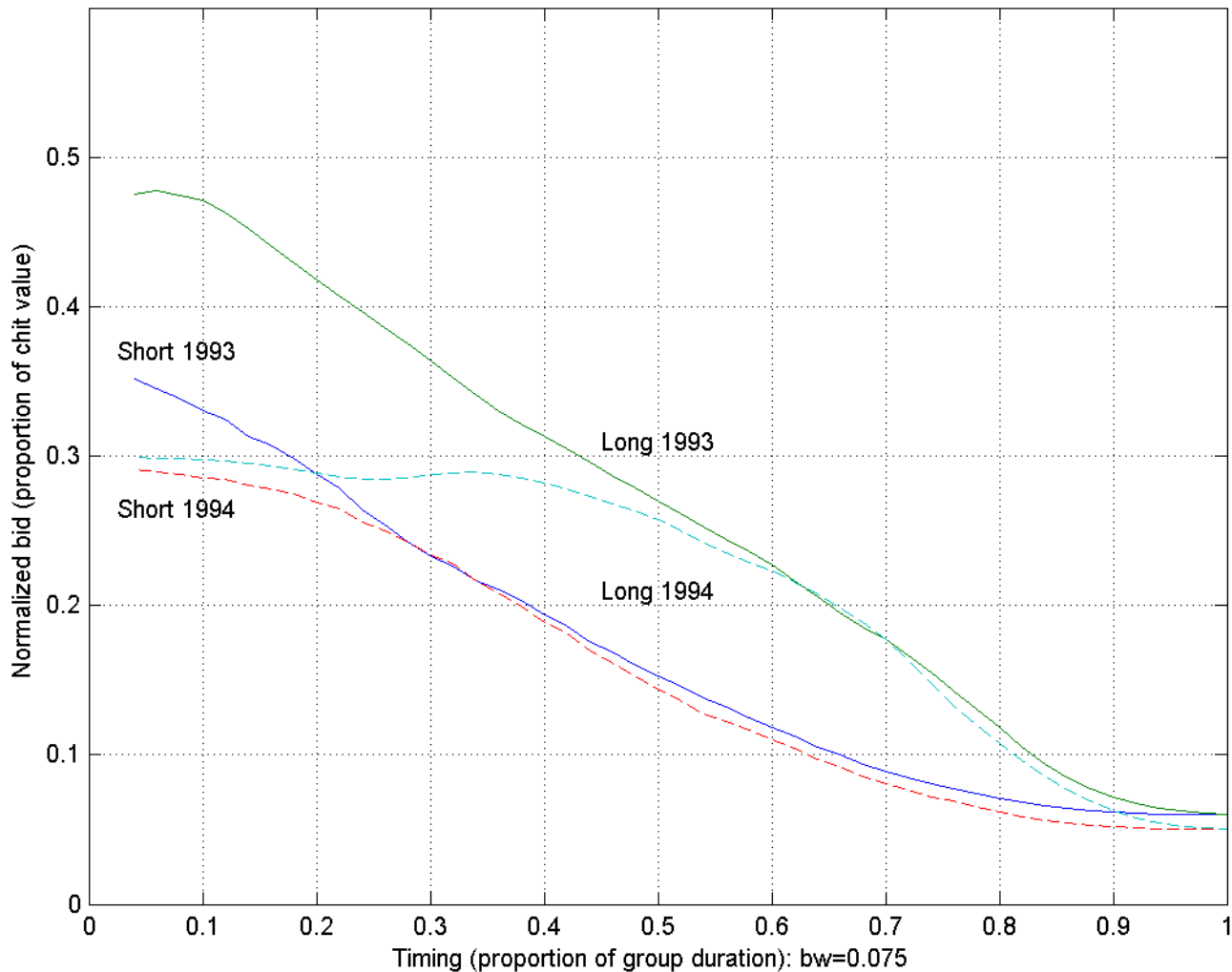
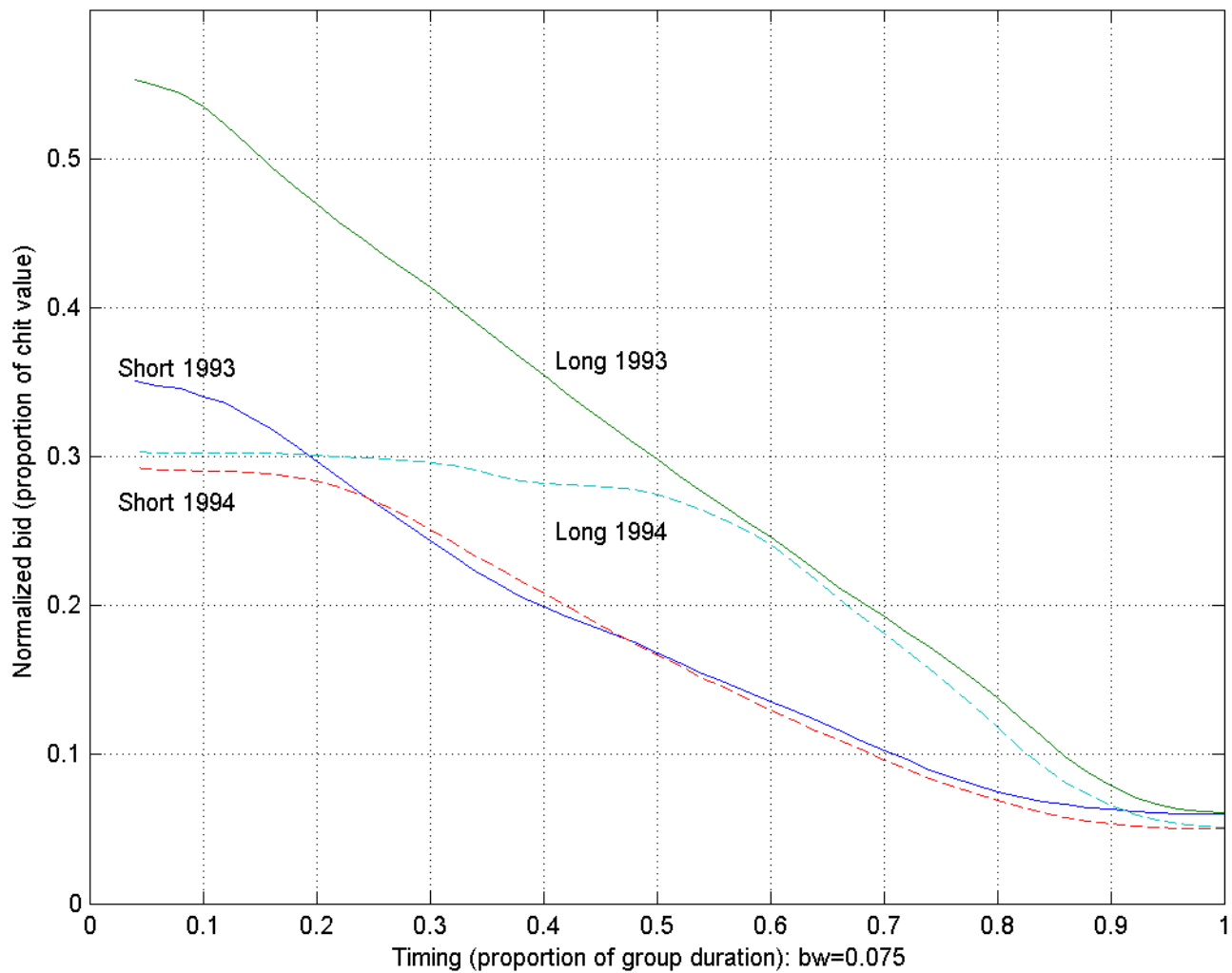




Figure 3: Bids - High Monthly Contribution



# The Bids Before and After

Normalized bids are higher in long duration groups – [Table A3](#)

The 30% cap in 1994 forces the highest bids down

See also the nonparametric kernel estimates of the bid regression – [Figures 1-3](#)

Theory predicts that the constrained groups (here, the long duration funds) will experience a higher increase in  $p$ : 1994 - duration dummy must be positive – [Table 5](#)

**Table 5: Matching into Groups (from 1993 to 1994)**

Dependent variable: Groups partitioned by: Chit value/contribution:	Proportion of corporate subscribers					
	chit value			monthly contribution		
	Low	Medium	High	Low	Medium	High
	(1)	(2)	(3)	(4)	(5)	(6)

A. Duration measured by a binary variable

Long duration dummy - 1994 dummy	0.059 (0.013)	0.030 (0.015)	0.088 (0.024)	0.073 (0.019)	0.039 (0.016)	0.086 (0.019)
Long duration dummy	-0.007 (0.009)	-0.014 (0.010)	-0.098 (0.018)	-0.018 (0.013)	-0.024 (0.011)	-0.063 (0.014)
1994 dummy	0.004 (0.011)	0.031 (0.008)	0.040 (0.020)	-0.009 (0.018)	0.022 (0.008)	0.042 (0.014)
Constant	0.179 (0.008)	0.141 (0.006)	0.208 (0.016)	0.190 (0.013)	0.150 (0.006)	0.173 (0.010)
Number of observations	1,022	675	328	849	720	456

B. Duration measured as a continuous variable (in years)

Group duration -1994 dummy	0.038 (0.008)	0.007 (0.014)	0.019 (0.009)	0.063 (0.015)	0.021 (0.012)	0.028 (0.008)
Group duration	-0.004 (0.006)	-0.014 (0.010)	-0.015 (0.005)	-0.016 (0.010)	-0.026 (0.008)	-0.014 (0.005)
1994 dummy	-0.063 (0.024)	0.020 (0.039)	0.037 (0.033)	-0.147 (0.047)	-0.020 (0.030)	-0.002 (0.026)
Constant	0.185 (0.017)	0.173 (0.027)	0.191 (0.022)	0.227 (0.033)	0.210 (0.021)	0.185 (0.017)
Number of observations	1,022	675	328	849	720	456

Note: Long duration dummy equals one if the group runs for at least 40 months, zero otherwise.

1994 dummy equals one if the group commenced in 1994, zero otherwise.

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>1000.

The group is the unit of observation.

Standard errors in parentheses.

# The Bids Before and After

Normalized bids are higher in long duration groups – [Table A3](#)

The 30% cap in 1994 forces the highest bids down

See also the nonparametric kernel estimates of the bid regression – [Figures 1-3](#)

Theory predicts that the constrained groups (here, the long duration funds) will experience a higher increase in  $p$ : 1994 - duration dummy must be positive – [Table 5](#)

Full adjustment to regulation in 1 year – [Figure 4,5](#)

Figure 4: Proportion of Short Duration Groups - Partitioning Groups by Chit Value

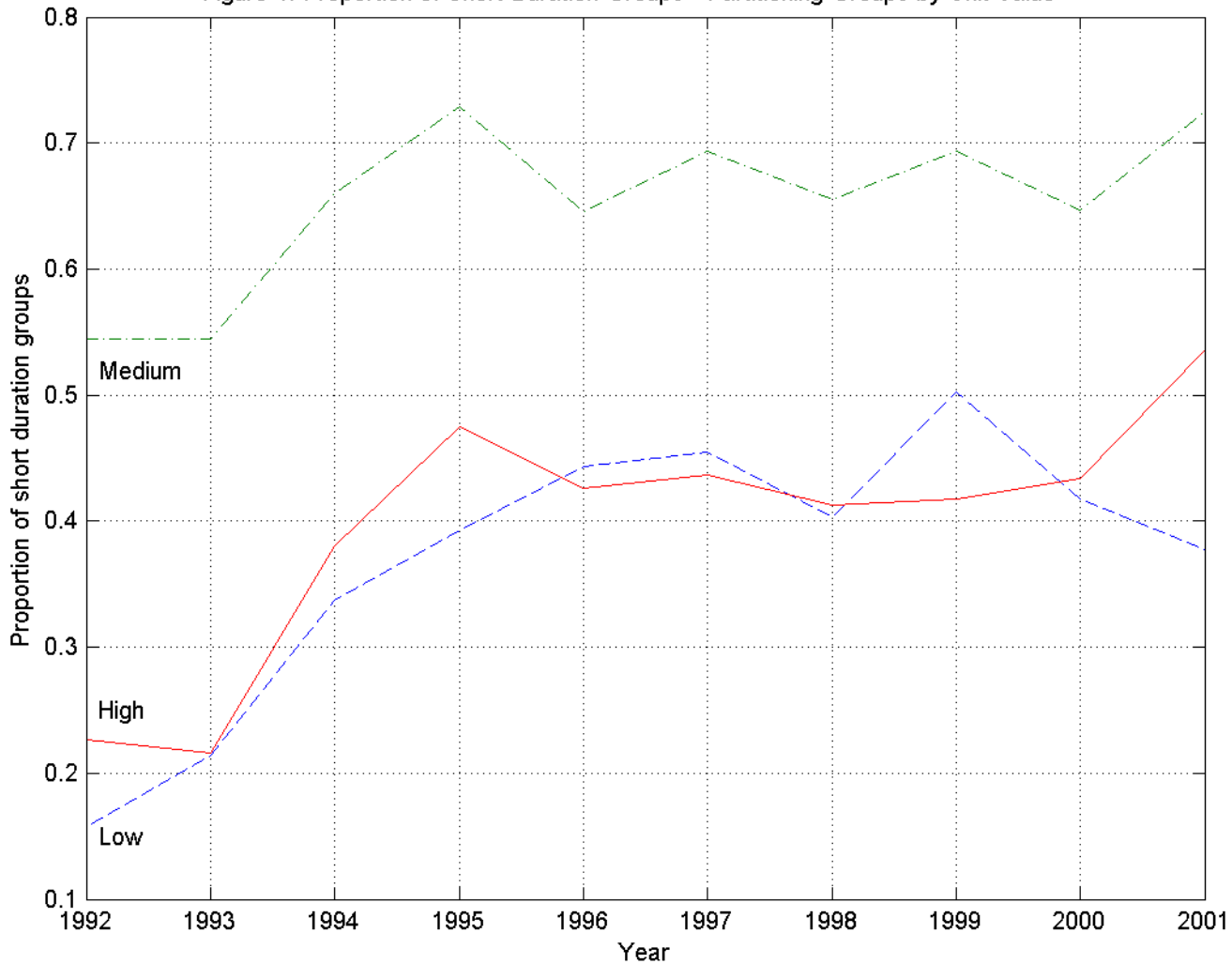
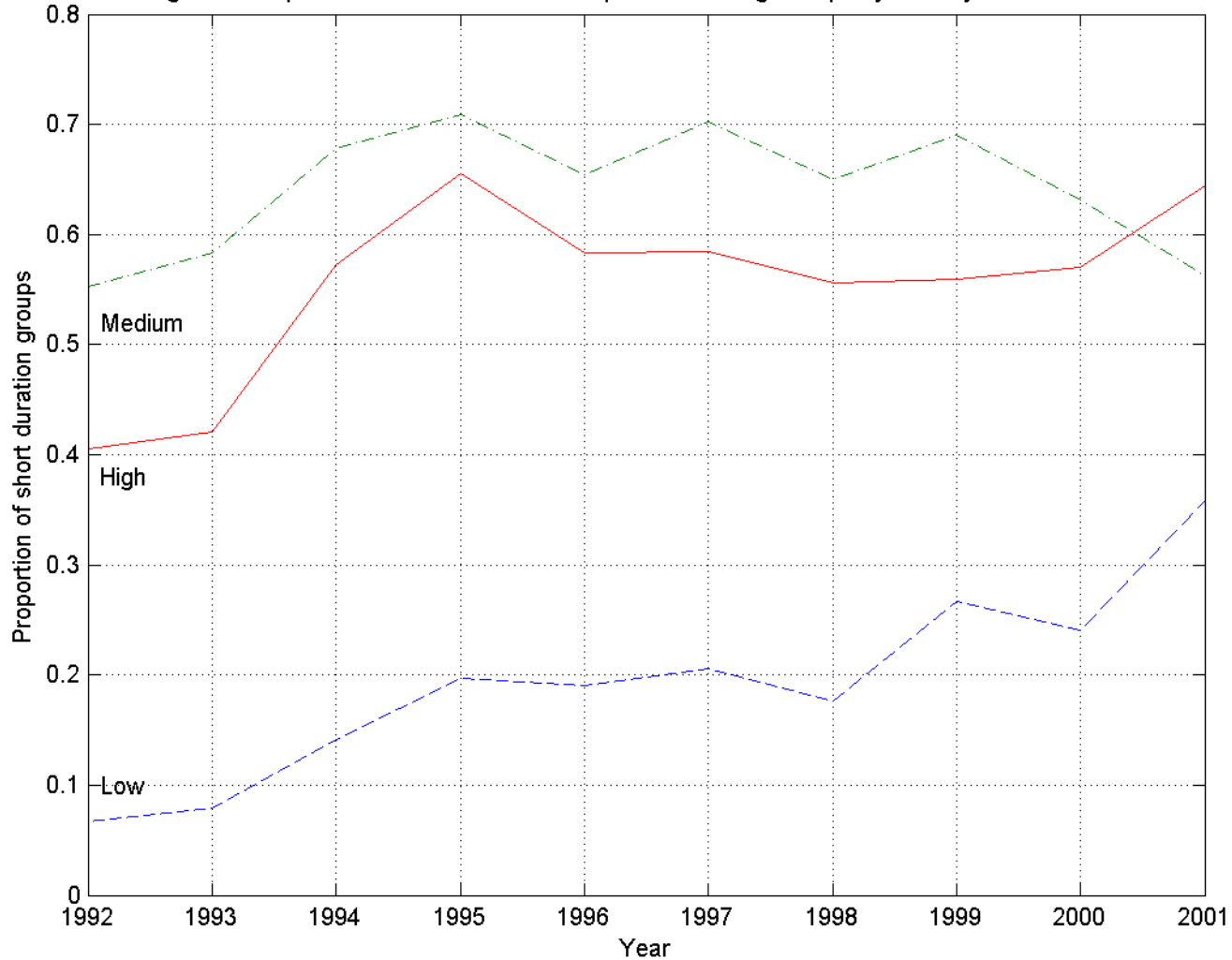


Figure 5: Proportion of Short Duration Groups - Partitioning Groups by Monthly Contribution



# The Implicit Interest Rate

The net present value of monthly contributions must equal the net present value of funds received:

$$D^\tau (Nv - b_\tau) + \sum_{t=0}^{N-1} D^t \left( \frac{1}{N} b_t - v \right) = 0,$$

where  $D = \frac{1}{1+r_m}$  is monthly interest factor,  $\tau$  is winning period

$$D = \left( \frac{Nv - b_\tau}{Nv - b_{\tau'}} \right)^{\frac{1}{\tau' - \tau}}.$$

Converting to an annual interest rate,

$$r = \left( \frac{Nv - b_{\tau'}}{Nv - b_\tau} \right)^{\frac{12}{\tau' - \tau}} - 1.$$

Table 7

**Table 7: Implicit Interest Rates**

Groups partitioned by:	chit value						contribution					
	Low		Medium		High		Low		Medium		High	
Chit value/contribution:	Short	Long	Short	Long	Short	Long	Short	Long	Short	Long	Short	Long
Duration:	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)

A. Interest rate computed using first and last month

1993	16.48 (0.36)	14.15 (0.12)	18.92 (0.32)	18.17 (0.63)	24.18 (1.02)	20.88 (0.56)	15.76 (0.38)	14.20 (0.12)	18.33 (0.28)	18.15 (0.64)	20.60 (0.69)	20.88 (0.56)
1994	17.00 (0.42)	9.95 (0.04)	14.52 (0.15)	8.77 (0.16)	16.58 (0.37)	8.38 (0.13)	16.09 (0.36)	9.95 (0.04)	15.30 (0.24)	8.77 (0.16)	15.88 (0.25)	8.38 (0.13)

B: Interest rate computed using 0.20\*duration and last month

1993	15.53 (0.44)	14.01 (0.12)	17.71 (0.32)	16.40 (0.56)	20.50 (0.97)	17.94 (0.49)	15.04 (0.72)	14.11 (0.12)	17.04 (0.32)	16.18 (0.57)	18.81 (0.53)	17.94 (0.49)
1994	16.88 (0.55)	10.80 (0.11)	16.39 (0.20)	9.98 (0.18)	18.98 (0.39)	10.00 (0.15)	17.36 (0.58)	10.80 (0.11)	16.28 (0.29)	9.98 (0.18)	17.97 (0.32)	10.00 (0.15)

Note: Short duration groups run for less than 40 months, Long duration groups run for at least 40 months.

Chit value: Low if chit value=10000, Medium if chit value 10000-50000, High if chit value>=50000.

Contribution: Low if contribution<500/month, Medium if contribution 500-1000, High if contribution>=1000.

Mean interest rate (in percentage) with standard errors in parentheses.

Interest rates are computed at the group level.



# Conclusion

Eluding Regulation, participants "vote with their feet" and we observe the response in the chit funds.

The participation decisions are as predicted by the theory: the proportion of borrowers  $p$  increases more in 1994 in the long duration funds (those that have the higher bids).

Even in the absence of market prices, participation decisions induce equilibrium, and there is full adjustment in one year.

Implicit interest rate calculations indicate that these institutions capture substantial gains from trade, and those gains are affected by the new regulation.