



Time is Money

P&SC 24th April 2023

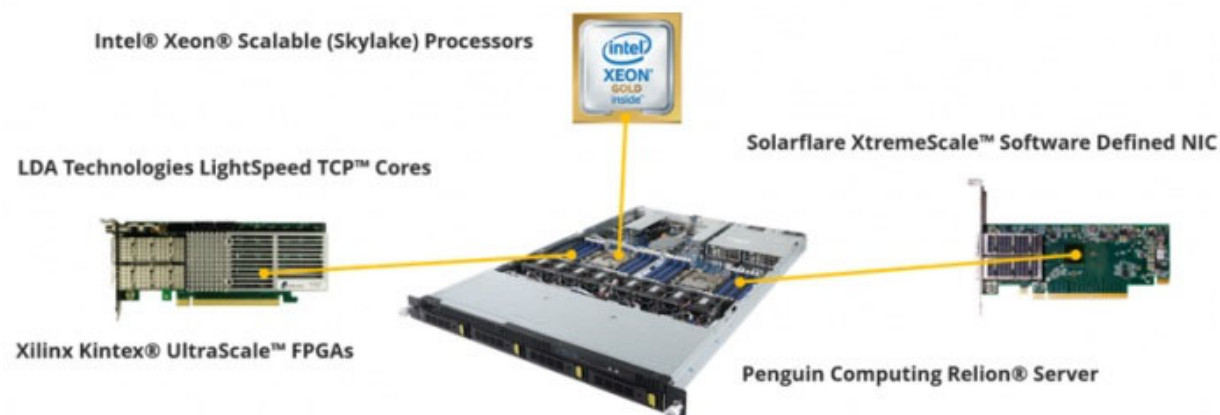
Dr Leon Lobo



Rise of the machines

- Infrastructure synchronisation
- Ultra low latency networks and colocation
- Instrumentation
 - Timestamping
 - Flow/Health monitoring
 - Latency and network performance
- Algorithmic & High Frequency Trading
- Trading algorithms
 - Optimisation and playback
- Tick warehousing
- Regulation
 - Market clarity
 - Forensics and audit
 - Order of execution
 - Cross venue monitoring

100,000s transaction per second
 Ultimate Trading Machine tick-to-trade 98ns (0.000 000 098s)



Race to zero





The Risk becomes a Financial threat



"What took a few days in August 2007 can unfold in a few minutes today given the amount of high frequency trading that now exists."

Andrew Lo Director of the MIT lab of financial engineering.

- The U.S. equity markets experienced the worst price decline and reversal since 1929 on May 6 2010. This has since been dubbed the **"flash crash"**.
- The cost of the Flash Crash: confidence has been shattered and roughly \$70bn has been pulled out of US equity funds since May 6.

A.4 Standards should play a larger role. Legislators and regulators should consider implementing accurate, high resolution, synchronised timestamps because this could act as a key enabling tool for analysis of financial markets

Financial regulation - EU

- Markets in Financial Instruments Directive II (MiFID II)
 - Traceability to UTC
 - HFT algo **100 μ s to UTC, 1 μ s resolution**
 - Electronic **1ms to UTC, 1ms resolution**



European Securities and
Markets Authority



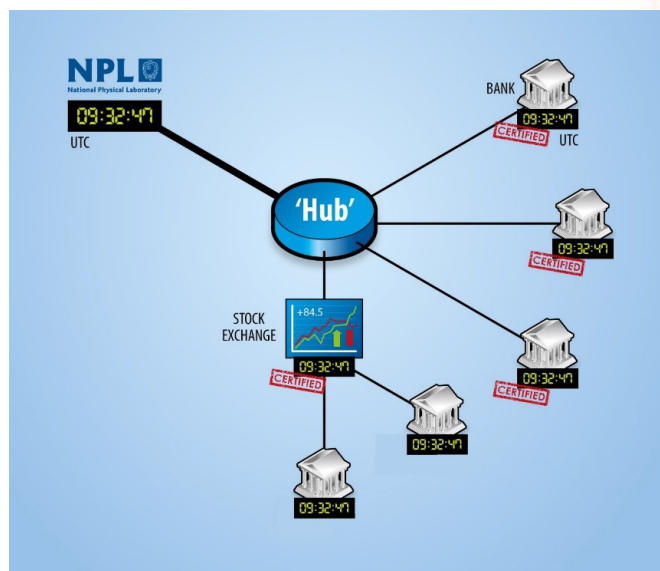
operators of trading venues and their members or participants are required to synchronise the clocks they use for any reportable events with UTC (Article 50 of Directive 2014/65/EU and Article 1 of Commission Delegated Regulation (EU) 2017/574)

3rd Jan 2018

Time as a Service (TaaS)

Traceable, Accurate, Available, Secure

NPLTime[®]



Traceability and MiFID II

- **Traceability** is a property of a measurement (including its uncertainties) that provides proof that the result obtained is an accurate representation of the reference
- The traceability chain is the unbroken chain of comparisons to a reference (with known uncertainties), in this case, UTC.



MiFID II requires traceability at the timestamp, NOT the timing source

Toward international regulatory convergence

- **UTC** traceability for business clock synchronisation
- Traceability at the **timestamp** (as an ideal scenario)
- Tiers of traceability mandated as per market requirement

IOSCO/MR/01/2020

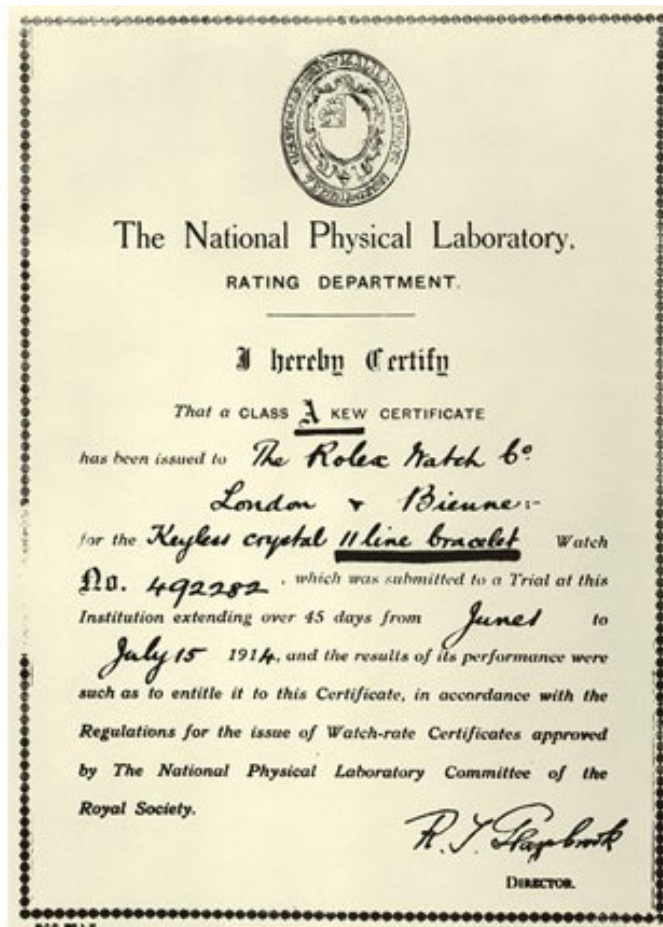
Madrid, 16 January 2020



International Organization of Securities Commissions
 Organisation internationale des commissions de valeurs
 Organização Internacional das Comissões de Valores
 Organización Internacional de Comisiones de Valores
 المنظمة الدولية لهيئات الأوراق المالية

IOSCO recommends synchronising clocks used for timestamping with UTC

A century on...



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		NPLTime®	
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Resilient Time for the Future

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