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SUBJECT: Phone Meeting with Department of Labor Economists

On April 3, 2019, representatives of the Securities and Exchange Commission ("SEC") participated in a phone meeting with Joseph Piacentini (Chief Economist) and Youngok Lim from the Department of Labor's Employee Benefits Security Administration. The SEC representatives participating on the call were Chyhe Becker, Narahari Phatak, and Jennifer Juergens from the Division of Economic and Risk Analysis, and Sarah ten Siethoff from the Division of Investment Management. Call participants discussed the attached paper.

The Ability of Investors to Time Purchases and Sales of Mutual Funds

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SUMMARY

For any particular period, rates of return experienced by investors may differ from those based on share prices and distributions because investors buy and sell shares throughout the period. If they time their transactions well by buying low and selling high, they can realize returns in excess of the returns of the funds in which they invest; if they make timing errors, their realized returns may fall short. Friesen and Sapp (2007) and Bullard et al. (2008) studied the timing of flows into and out of US equity mutual funds from 1991 through 2004 and found that investors on average experienced reduced returns or a “performance gap” due to errors in timing of investments. The studies further demonstrated that investors in load funds incurred larger losses due to timing errors than investors in no-load funds. (Load funds are generally sold through brokers and charge fees for purchasing, selling, or holding fund shares. These fees serve to compensate brokers for their advice and other services.) This document reviews those studies and presents the results of our independent analysis of performance gaps due to timing issues based on newer data through 2016.

We broadly confirm the results for 1991-2004. Newer data show that the average performance gap for US equity funds may have narrowed in recent years, but the excess performance gap experienced by investors in load funds has not. Despite the advice that brokers provided, investors in US equity and sector load funds made timing errors that reduced their average annual rate of return by 1.12 percentage points more than their counterparts who invested in no-load funds. These reduced returns translate into foregone investment earnings of \$10.8 billion in 2016. For international equity funds, the excess performance gap was 0.69 percentage points and caused losses of \$2.2 billion in 2016. Also including balanced, target date, and bond funds, investors in load funds lost approximately \$16 billion annually in investment earnings due to excess timing errors.

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1. INTRODUCTION

For any particular period, rates of return experienced by financial investors may differ from those based on share prices and distributions because investors buy and sell shares throughout the period. Investors who manage to “buy low and sell high” can realize above-market returns, whereas errors in the timing of purchases and sales can result in below-market returns. Several studies concluded that, on average, rates of return realized by investors in mutual funds are reduced due to suboptimal timing of purchases and sales (e.g., Friesen and Sapp, 2007; Bullard et al., 2008). The difference between the rate of return under a buy-and-hold strategy and actual returns realized by investors is called the performance gap. This performance gap was found to be larger among load funds than among no-load funds. Loads may introduce a conflict between the investor’s interest and a broker’s own interest, because funds generally use load proceeds to compensate brokers. If confirmed in recent data, an excess performance gap among load funds over no-load funds may therefore inform the current debate on conflicts of interest in the financial services industry.

This document contains a review of the Friesen and Sapp (2007) and Bullard et al. (2008) studies. Both studies relied on data for US equity mutual funds from 1991 through 2004. This document further reports on our own analysis of performance gaps based on more recent data and more types of mutual funds.

Funds may charge several types of loads. To prevent confusion over the distinction between load and no-load funds, we adopt the following definitions.¹

- A front-end load is a one-time charge that investors pay at the time of purchase. It is also known as a sales charge or front load.
- A back-end load is a one-time charge that investors pay at the time of sale. It is also known as a deferred load, a surrender charge, or a back load.
- A level load is a recurring charge that investors pay for as long as they own fund shares. For example, a fund may charge 1% of invested assets annually. It is also known as a 12b-1 fee or distribution fee, and it is included in a fund’s expense ratio.
- A (legal) no-load fund is a fund that charges neither a front-end nor a back-end load. It may charge a level load of at most 0.25%.
- A pure no-load fund is a fund that charges neither a front-end, nor a back-end, nor a level load. Pure no-load funds are a subset of legal no-load funds.

The remainder of this report is organized as follows. Section 2 summarizes the approach and findings of Friesen and Sapp (2007) and Bullard et al. (2008). It also reports on our attempt to replicate their findings on performance gaps of US equity funds in 1991-2004. Section 3 presents results of our own analysis of investor timing on newer data through 2016 and on more types of funds (US equity, sector, international equity, target date, balanced, and bond funds). Section 4 discusses the strengths and weaknesses of the two studies, interprets the results for the recent time period, and presents robustness checks. Section 5 concludes.

¹ Also see <https://www.sec.gov/fast-answers/answersmffeeshtm.html>.

2. SYNOPSIS AND REPLICATION OF INVESTOR TIMING ARTICLES

This section reviews Friesen and Sapp (2007) and Bullard et al. (2008), and attempts to replicate their findings. The emphasis is on Friesen and Sapp (2007) because it was published in a peer-reviewed journal (the *Journal of Banking & Finance*) and because its method and source data were adopted by Bullard et al. (2008).

Our review focuses on the following observation by Friesen and Sapp (2007, p. 2807):

Load funds are typically purchased with the help of a broker or investment advisor, and our evidence suggests that those investors who are most likely relying on advice from a broker perform especially poorly from a timing standpoint.

This observation, which was based on a regression model of how the performance gap for particular funds varied with fund characteristics, including the average loads charged by those funds, corroborates an earlier observation that the monthly performance gap for no-load funds of 0.08% was only one-half of the performance gap of 0.16% for load funds (Friesen and Sapp, p. 2802). The difference in monthly performance gaps translates into an annual difference of about 1% ($12 \times 0.08\%$).²

The authors compared the average monthly return for a fund under a buy-and-hold strategy ("time-weighted return") with a measure of the internal rate of return for that fund ("dollar-weighted return"). They then attributed the difference (or performance gap) between the two monthly returns to the effects of investors' attempting to time the market. And in making the inference that investors who relied on brokers' advice made poor timing decisions, the authors' essentially assume that investors in load funds are receiving advice from brokers, while investors in no-load funds do not.

Method

Friesen and Sapp selected domestic common stock funds that existed at any time from 1991 to 2004 from the Center for Research in Security Prices (CRSP) Survivor-Bias Free Mutual Fund Database. Certain funds were excluded from the analysis: (1) funds with total net assets unavailable, (2) funds with fewer than 12 monthly observations, (3) international, balanced, and specialized funds, and (4) funds for which the calculated dollar-weighted return (described below) was less than or equal to -100%. The resulting sample had 7,125 funds.

The key measures in Friesen and Sapp's analysis are the time-weighted monthly return, the dollar-weighted monthly return, and the difference between these

² Throughout Friesen and Sapp (2007), Bullard et al. (2008), and this document, the performance gap is expressed as a percentage-point difference, not a relative difference.

measures, which is called the performance gap. The time-weighted (geometric average) return for the j^{th} fund, \bar{r}_j^g , is defined as

$$\bar{r}_j^g = \left(\prod_{t=1}^T (1 + r_{jt}) \right)^{1/T} - 1$$

where r_{jt} is that fund's monthly return in the t^{th} period and T is the number of months under study. It may be interpreted as the average rate of return experienced in a buy-and-hold strategy.

The dollar-weighted return (\bar{r}_j^d) is the internal rate of return on aggregate assets invested in fund j , given its investors' purchases and sales over the period. It is calculated by finding the value for \bar{r}_j^d that satisfies the following equality

$$TNA_{j,0} (1 + \bar{r}_j^d)^T + \sum_{t=1}^T NCF_{j,t} (1 + \bar{r}_j^d)^{(T-t)} = TNA_{j,T}$$

where $TNA_{j,0}$ are total net assets at the start of the period, $TNA_{j,T}$ are total net assets at the end of the period, and $NCF_{j,t}$ is the net cash flow in the t^{th} month for the j^{th} fund.³ Net cash flow is defined by

$$NCF_{j,t} = TNA_{j,t} - TNA_{j,(t-1)} (1 + r_{jt}).$$

The dollar-weighted rate of return is the same as the time-weighted return for investments made prior to the period of interest and held throughout the period, i.e., $NCF_{j,t}=0$ for all t . The rates may diverge depending on when investments were made or sold during the period. For example, suppose monthly rates of return were higher in the second half of the period than in the first, and an investor sold most shares midway through the period. The dollar-weighted return would then fall short of the time-weighted return, and the investor faces a performance gap due to suboptimal investment timing. In the words of Friesen and Sapp (p. 2801): "This timing performance measure simply judges the success of investor cash flows against a buy-and-hold strategy in the respective fund."

All calculations are performed at the fund level, i.e., the calculated rates of return reflect those of all investors in a fund combined.

³ Friesen and Sapp's (2007, p. 2801) equation (2) is missing the fund subscripts for the total net assets and net cash flows variables, but it is obvious from the description that these variables are fund-specific measures. This formula produces the same result as Excel's IRR function, with the following cash flow range: the negative of the initial TNA for period zero, the negative of the NCFs for periods 1 through $T-1$, and the final TNA minus the NCF for period T .

Key Results

Friesen and Sapp (2007)

Friesen and Sapp described how the time-weighted returns, dollar-weighted returns and performance gaps differed for different types of funds (which the authors referred to as univariate sorts of the data) and then estimated a regression model that explains how the performance gap varies with fund characteristics.⁴ Turning first to the univariate sorts, Table 1 summarizes the results. The average returns and performance gaps were calculated as simple averages over funds, without regard to fund size.

- The top part of Table 1 compares funds by whether they charge a front-end (sales) or back-end (deferred) load. It is reproduced from Friesen and Sapp's Table 2, Panels A, D, and E. The columns list the number of funds in each category, the average time-weighted monthly return, the average dollar-weighted monthly return, and the performance gap—the difference between the returns in the previous two columns.
- The middle part of Table 1 compares funds by their size. It is constructed from Panel A of Friesen and Sapp's Table 4. The columns contain the same information as the columns of the top part, with the exception that average total net assets are shown in place of the number of funds in the first column. (By construction each quintile contains $7,125/5=1,425$ funds.)
- The bottom part of Table 1 compares funds by their risk-adjusted performance. It is reproduced from Panel A of Friesen and Sapp's Table 5. The columns list the average 3-factor alpha, the average performance gap, and the net monthly return—the difference between the returns in the preceding two columns—for deciles ranging from the worst-performing to best-performing funds (as measured by 3-factor alphas).

⁴ Friesen and Sapp also examined how the performance gap varies with fund objectives. We do not discuss these results, since they are not central to our evaluation.

Table 1. Summary of Friesen and Sapp's Univariate Sorts

	N	Time-weighted Monthly Return	Dollar-weighted Monthly Return	Performance Gap
All funds	7,125	0.62%	0.49%	0.13%
Load funds	4,408	0.53%	0.38%	0.16%
No-load funds	2,717	0.70%	0.63%	0.08%

	Average TNA (millions)	Time-weighted Monthly Return	Dollar-weighted Monthly Return	Performance Gap
<i>By assets under management:</i>				
First (smallest) TNA quintile	\$1.30	0.44%	0.43%	0.01%
Second TNA quintile	\$8.56	0.51%	0.39%	0.12%
Third TNA quintile	\$30.70	0.59%	0.45%	0.14%
Fourth TNA quintile	\$100.79	0.69%	0.52%	0.17%
Fifth TNA quintile	\$1,215.65	0.76%	0.57%	0.19%

	N	3-factor alpha	Performance Gap	Net Return
<i>By risk-adjusted performance:</i>				
First (worst) decile		-0.993%	0.068%	-1.061%
Second decile		-0.512%	0.080%	-0.592%
Third decile		-0.369%	0.054%	-0.423%
Fourth decile		-0.277%	0.036%	-0.313%
Fifth decile		-0.201%	0.076%	-0.277%
Sixth decile		-0.131%	0.094%	-0.225%
Seventh decile		-0.061%	0.146%	-0.207%
Eighth decile		0.015%	0.171%	-0.156%
Ninth decile		0.139%	0.166%	-0.027%
Tenth decile		0.571%	0.378%	0.193%
All Funds	7,125	-0.182%	0.127%	-0.309%
Alpha > 0	1,902	0.273%	0.252%	0.021%
Alpha ≤ 0	5,223	-0.348%	0.081%	-0.429%

The key findings are the following:

- The average time-weighted monthly return of 0.62% for the common stock funds in Friesen and Sapp's sample exceeded the average dollar-weighted monthly return of 0.49% by 0.13%. This result translates into an annual performance gap of about $12 \times 0.13\% = 1.6\%$.
- Most germane to our evaluation, the performance gap for load funds (0.16%) exceeds the performance gap for no-load funds (0.08%) by about 0.08%, or about 1% annually. And because no-load funds have higher time-weighted averages, the average returns realized by investors (dollar-weighted) in no-load funds exceed the average for investors in load funds by 0.25% per month, or about 3% annually.
- The performance gap increases monotonically with fund size, from only 0.01% per month for the smallest quintile to 0.19% per month for the largest

quintile. However, because larger funds have substantially higher average returns (i.e., time-weighted averages), the average returns realized by investors (dollar-weighted) in the larger funds are still larger than investors realize in smaller funds. For example, the dollar-weighted average monthly return for the largest quintile exceeds the average for the smallest quintile by 0.14%, or 1.7% annually.

- The performance gap also generally increases with the risk adjusted fund performance (as measured by the 3-factor alpha).⁵ For example, the monthly performance gap increases from 0.04%-0.08% for the worst-performing half to 0.38% for the best-performing decile. Friesen and Sapp (2007, p. 2805) also observe that for funds with a positive alpha “the alpha gains of 0.27% per month offered by these good-performing funds is largely offset by average investor underperformance of 0.25% per month due to poor investor performance.” However, on this basis investors in funds with zero or negative alphas fare considerably worse, even though their average timing performance gap is smaller.⁶

Friesen and Sapp (2007, pp. 2805-2808) also estimate regression models that combine the variables considered individually in Table 1 (as well as other fund characteristics). The models showed that the performance gap increases with the age of the fund (as measured by the number of monthly returns in the sample), average total load, average turnover,⁷ and average return.⁸

Friesen and Sapp perform additional analyses designed to provide possible explanations for the performance gap. For example, they test alternative simulations of the process by which investors move assets into or out of funds in response to monthly returns (Friesen and Sapp, 2007, pp. 2805-2808). The simulation that most closely approximated the average return and performance gap for their sample was one in which “investors flee from low returns, but cash flows to good-performing funds are random.”⁹

⁵ Friesen and Sapp also present results for 4-factor alphas, which are qualitatively similar.

⁶ The averages for the funds with average alpha less than or equal to zero are calculated from the next-to-last two rows of Table 1 with the following formula:

$$return_{\alpha \leq 0} = (N_{All\ Funds} return_{All\ Funds} - N_{\alpha > 0} return_{\alpha > 0}) / (N_{All\ Funds} - N_{\alpha > 0}).$$

⁷ “Turnover is defined as the minimum of aggregate purchases or sales of securities during the year, divided by the average TNA.” Friesen and Sapp (2007, p. 2800, their Table 1). Morningstar explains that “the resulting percentage loosely represents the percentage of the portfolio’s holdings that have changed over the past year.” See http://www.morningstar.com/invGLOSSARY/turnover_ratio.aspx.

⁸ Measuring return as alpha produced very similar results.

⁹ Friesen and Sapp (2007, pp. 2813-2814). The simulation being described was constructed so that investors withdrew funds in proportion to that fund’s underperformance relative to an average fund (plus a random component), but added or withdrew funds randomly when the fund outperformed the average. The authors also tested a scenario in which investors added funds in proportion to a fund outperforming the average fund, but added or withdrew funds randomly when the fund underperformed. This alternative scenario matches the average return and performance gap of the sample almost as closely.

Bullard, Friesen and Sapp (2008)

The major focus of Bullard et al. (2008) appears to be dividing the load/no-load univariate sorts into finer subclasses. First, the load category now includes funds with 12b-1 fees in excess of 0.25% and is divided into Class A, B, and C shares.¹⁰ Second, the no-load category distinguishes between legal no-load funds that are not pure no-load (i.e., funds with no front-end or back-end loads and non-zero 12b-1 fees of at most 0.25%) and pure no-load funds (funds with no loads and no 12b-1 fees). Although the analysis started with the same source data as Friesen and Sapp (2007), the sample used in the analysis included fewer funds because of missing share class identifiers (Bullard et al., 2008, p. 7).¹¹ Table 2 summarizes the results of the analysis.

Table 2. Summary of Results of Bullard et al. (2008)

	N	Performance Gap	Performance Gap (Friesen/Sapp)	Performance Gap (relative to pure no-load)	Performance Gap (relative to pure no-load Table 5 Model II)
All funds	6,164	0.136%	0.13%		
Load funds	4,782	0.152%	0.16%	0.087%	
Class A	1,956	0.135%		0.070%	0.103%
Class B	1,893	0.190%		0.125%	0.187%
Class C	933	0.111%		0.046%	0.094%
No-load funds	1,382	0.082%	0.08%		
Legal, not pure	242	0.159%		0.094%	0.094%
Pure	1,140	0.065%			

The first column reports the number of funds in each category or subcategory. The second column lists the performance gaps reported in Bullard et al. (2008, their Table 2). The third column list the corresponding results from Friesen and Sapp (2007), as also reported in the last column of the first panel in Table 1 above. The fourth column reports the difference between the pure no-load performance gap and the corresponding gaps for other categories/subcategories. Finally, the last column reports the coefficients of the fund class indicator variables from Bullard et al.'s regression Model II (their Table 5).¹²

Overall (1) the absolute and relative size of the performance gap measures is quite close to the corresponding results in Friesen and Sapp (2007), (2) the performance gap for legal no-load funds is comparable to the performance gap for load funds, and

¹⁰ See the Appendix for a definition of share classes.

¹¹ Not only does the total number of funds differ between the two articles, but the relative proportions in the load and no-load categories are quite different. Table 1 shows that there were 4,408 (62%) load and 2,717 (38%) no-load funds in the Friesen and Sapp article and Table 2 shows that there were 4,782 (78%) load and 1,382 (22%) no-load funds in the Bullard et al. article.

¹² The regressions are similar in structure to the ones in Friesen and Sapp (2007). Conditional on class share indicator variables, the load and turnover variables were no longer statistically significant. Separately, while the total net assets variable was not significant in Friesen and Sapp (2007), it was highly significant in Bullard et al. (2008).

(3) within the load fund category, Class B shares had a noticeably larger performance gap than Classes A and C. Bullard et al. (2008) summarize these results as follows (p. 19):

We find that investors who purchase load or legal no-load funds experience greater underperformance due to poor timing than investors who buy pure no-load funds [...] Load fund Class B shares have the lowest alpha, reflecting relatively high annual expenses, and existing evidence suggests that B shares are generally a poor choice for investors. The finding that investors in Class B shares also experience the worst average timing performance casts these shares in a further bad light. [...]

These results sound a warning to fund investors who are considering whether to attempt market timing, either on their own initiative or through their broker's advice. Rather than outperforming a given fund, the average active investor is more likely to underperform a passive dollar invested in the fund, and transacting with the aid of an investment professional is correlated with even worse investment timing performance.

Replicating Friesen and Sapp (2007)

We attempted to replicate the main elements of the analysis of Friesen and Sapp (2007) on US equity data for the time period they studied (January 1991 through December 2004). While the analysis of Friesen and Sapp (2007) is based on CRSP data, we use characteristics of mutual funds and their monthly rates of return and assets under management as provided by Morningstar Direct. Both sources cover both funds that continue to operate and funds that liquidated or merged with other funds. Consistent with Friesen and Sapp (2007), we restrict the data to U.S. equity funds, follow assets in merged funds as-if the original funds had continued operations, and exclude funds with fewer than 12 monthly observations in the period under analysis. All our calculations followed the formulas of Friesen and Sapp (2007).¹³

¹³ More precisely, our calculations differ in one minor respect. Friesen and Sapp (2007) multiply monthly performance gaps by 12 to calculate an annual metric. Instead, we define the annual performance gap for fund j as:

$$\text{Annual performance gap} = (1 + \bar{r}_j^g)^{12} - (1 + \bar{r}_j^d)^{12},$$

where \bar{r}_j^g is the monthly time-weighted rate of return and \bar{r}_j^d the monthly dollar-weighted rate of return of fund j .

A number of other published papers—discussed in Section 5—also follow Friesen and Sapp's approach to measuring performance gaps. In contrast, Morningstar applies a different method to measure the investor timing effects. (See, for example, Kinnel 2015.) The Morningstar approach increases monthly cash flows by adding distributions to investors that are not reinvested. Thus, relative to Friesen and Sapp, the Morningstar approach produces larger performance gaps.

Table 3 shows average monthly rates of return and monthly and annual performance gaps for load and no-load funds, along with the difference in performance gaps between load funds and no-load funds. It should be compared to the results of Friesen and Sapp (2007) as reproduced in the top panel of Table 1 above. Consistent with Friesen and Sapp (2007), load funds are defined as funds that charge a front-end load (sales charge) or a back-end load (deferred charge), whereas no-load funds charge neither a front- nor a back-end load, but may charge a level load.

Table 3. Average Rates of Return and Performance Gaps for Load and No-Load Funds (US Equity Funds, 1991-2004)

	Number of Funds	Time- weighted monthly return	Dollar- weighted monthly return	Monthly performance gap	Annualized performance gap
Load funds*	3,615	0.74%	0.49%	0.24%	3.02%
No-load funds*	3,759	0.89%	0.74%	0.15%	1.95%
All funds	7,374	0.83%	0.65%	0.19%	2.34%
Load - No-load (<i>t</i> -Statistic)				0.09% (9.72)	1.07% (9.18)

* Load funds defined as funds that charge a front- or back-end load; no-load funds charge neither, but may charge a level load.

Source: Authors' calculations based on Morningstar Direct.

We covered 7,374 US equity funds in our analysis, compared with 7,125 funds in Friesen and Sapp (2007). The difference may stem from different source data (CRSP versus Morningstar Direct), treatment of fund mergers, treatment of missing data, or treatment of outliers. Treatment of merged funds involves several decisions that may affect fund count. For example, if Fund A acquires Fund B, and the resulting fund is subsequently acquired by Fund C, we count these as three funds (while maintaining the same total assets).¹⁴ If a fund has missing values for some monthly returns or assets under management, we do not exclude the fund from our analysis, but include the fund with only the most recent months without missing values. Finally, we encountered some outlier funds with very large positive or negative performance gaps which Friesen and Sapp (2007) may have excluded; see page 21 below.

Friesen and Sapp found a time-weighted (geometric) average monthly rate of return of 0.62%. That average did not account for fund size and is very close to our corresponding average of 0.63% (not shown in Table 3). Weighted by fund size, we calculated a time-weighted average monthly return of 0.83%.¹⁵

¹⁴ A merger is reflected in raw asset data as a complete sell-off of all shares in one fund and a corresponding influx of assets into another fund. However, this asset flow is not the result of investors' purchase and sale decisions. Instead, we follow assets in a merged fund as-if the original fund had continued operations, and correspondingly reduce assets in the acquiring fund.

¹⁵ To clarify: like Friesen and Sapp (2007), we calculate a time-weighted average monthly return for every fund. It is time-weighted in the sense that all months receive equal weight in this calculation. When calculating the average over funds, Friesen and Sapp took a simple average, irrespective of fund size. In contrast, in Table 4 and elsewhere we weighted the individual funds' rates by fund size,

Friesen and Sapp found a dollar-weighted average monthly rate of return of 0.49%, compared with our 0.61% (not shown in Table 3). We believe at least part of the discrepancy is due to outliers. The assets under management of some (smaller) funds fluctuated very substantially, sometimes leading to a dollar-weighted rate that differed markedly from the time-weighted rate. Henceforth, we therefore report only fund averages that are weighted by fund size. Weighted by fund size, the dollar-weighted average monthly return was 0.65% per our calculations.

Weighted by fund size, Friesen and Sapp found an average monthly performance gap of 0.19%.¹⁶ We, too, calculated a fund-size-weighted average monthly performance gap of 0.19%. On an annualized basis, the average performance gap was 2.34%.

Friesen and Sapp reported that the performance gap for load funds was 0.08% per month worse than for no-load funds, or about 1% per year. This figure is an average over funds without regard for their size, and Friesen and Sapp do not report sufficient detail to calculate a differential that is weighted by fund size. As shown in Table 3, we find that the monthly performance gap among load funds (0.24%) exceeded the gap among no-load funds (0.15%) by 0.09%. On an annual basis, this implies that investors in load funds suffered a performance gap that was 1.07% worse than investors in no-load funds. This result is both economically meaningful and highly statistically significant.

In short, we closely confirm the results of Friesen and Sapp (2007). From 1991 to 2004, timing errors cost the average investor approximately 2.3 percentage points, and the performance gap was about 1 percentage point worse for investors in funds that charge a front- or back-end load than in funds that charge neither.

3. TIMING PERFORMANCE GAPS IN RECENT DATA

This section reports on our application of the Friesen and Sapp (2007) method to more recent data and more types of mutual funds. We adopt the following changes. First, our main analysis is based on funds' performance over the past decade. Second, Friesen and Sapp (2007) studied US equity funds; we combine sector equity with US equity funds, and also analyze international equity funds, balanced funds, target date funds (TDFs), and bond funds. Third, in order to improve the comparison between investors with and without broker assistance, we exclude Institutional-class funds, Retirement-class funds, and funds with missing share class. Fourth, we adjusted the comparison of load and no-load funds in line with the legal definition of no-load: load funds include funds that charge any front-end load, any back-end load, or a level load in excess of 0.25%. The no-load reference category consists of legal no-load funds, i.e., funds without front- or back-end loads, and a level load, if any, of at most 0.25%.¹⁷

measured as average assets under management. An alternative is to also weight by the number of months which the fund contributed to the analysis, which generates very similar results.

¹⁶ Based on quintile figures in Table 4 of Friesen and Sapp (2007), replicated in Table 1 above.

¹⁷ To facilitate a direct comparison of 1991-2004 and 2007-2016: The average performance gap for US equity funds (including Institutional, Retirement, and

As noted, our main analysis focuses on the decade from January 2007 through December 2016. We selected this period because it is recent and because it includes both periods in which equity markets performed poorly and periods in which equity returns were strong. For example, the S&P 500 Total Return index lost 55% of its value between October 9, 2007 and March 9, 2009, and almost quadrupled between March 9, 2009 and the end 2016. We also explored longer periods and investigated shorter periods (such as the Great Recession) to better understand correlates of performance gaps. The gaps were generally larger over longer periods, whereas single-year gaps were considerably smaller. Indeed a gap can emerge only if trades take place and the buy-and-hold strategy is broken, which is more likely over longer periods. Pushing the argument to an extreme, one-minute gaps tend to be zero because most investors do not trade during any particular minute. We also found that a multi-year gap can be positive even though the single-year gaps in that period were negative (or vice versa).

Table 4 shows assets under management by category for active mutual funds at the end of 2016. These figures exclude assets under management in Institutional-class funds, Retirement-class funds, and funds with missing share class. US equity funds managed \$3.5 trillion, sector funds \$0.3 trillion, international equity funds \$1.1 trillion, balanced funds \$1.1 trillion, TDFs \$0.6 trillion, and bond funds \$2.1 trillion. Restricted to load funds (with any front-end load, any back-end load, or a level load over 0.25%), US equity load funds managed \$881 billion, sector load funds \$90 billion, international equity load funds \$338 billion, balanced load funds \$531 billion, load TDFs \$54 billion, and bond load funds \$622 billion. Any excess performance gaps for load funds over no-load funds thus affected a total of \$2.5 trillion in invested assets at the end of 2016.

Table 4. Assets under Management, by Fund Category (End of 2016)

	Legal load funds	Legal no-load funds	Total
US equity funds	\$881 bn	\$2,623 bn	\$3,503 bn
Sector funds	\$90 bn	\$230 bn	\$319 bn
International equity funds	\$338 bn	\$752 bn	\$1,090 bn
Balanced funds	\$531 bn	\$550 bn	\$1,081 bn
Target date funds	\$54 bn	\$556 bn	\$610 bn
Bond funds	\$622 bn	\$1,488 bn	\$2,110 bn
Total	\$2,515 bn	\$6,198 bn	\$8,713 bn

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

missing share classes) in 2007-2016 was 0.53% and the excess performance gap for funds that charge a front- or back-end load was 1.58%. While the overall gap thus narrowed relative to 1991-2004, the excess gap for load funds widened (see Table 3).

Rates of Return and Performance Gaps for Load and No-Load Funds

Table 5 shows average annualized rates of return and performance gaps for US equity and sector equity funds for 2007-2016, along with the difference in performance gaps between load funds and no-load funds. The overall performance gap in 2007-2016 was 1.01%. The gap was wider for load funds, and the difference in annual performance gaps between load and no-load funds was 1.12%. The difference is also highly statistically significant.

Table 5. Average Rates of Return and Performance Gaps for Load and No-Load Funds (US Equity and Sector Funds, 2007-2016)

	Number of funds	Time-weighted annualized return	Dollar-weighted annualized return	Annualized performance gap
Legal load funds	6,490	6.15%	4.34%	1.80%
Legal no-load funds	3,488	7.50%	6.82%	0.69%
Total	9,978	7.10%	6.09%	1.01%
Load - No-Load (<i>t</i> -Statistic)				1.12% (20.49)

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

The excess performance gap of 1.12% is due to investor timing issues. Separately, no-load funds outperformed load funds by $7.50\% - 6.15\% = 1.35\%$ (see the second column). The total underperformance was thus $1.12\% + 1.35\% = 2.47\%$, which, up to rounding error, may also be calculated from the third column: $6.82\% - 4.34\% = 2.48\%$.¹⁸

¹⁸ Charges for front-end and back-end loads further reduce the net rates of return of investors in load funds. Similarly, investors in no-load funds may incur expenses for investment advice—such as from a Registered Investment Adviser—which reduce their net returns.

Table 6 shows the results for international equity funds. The overall performance gap in 2007-2016 was 1.07%, and the gap for load funds exceeded the gap for no-load funds by 0.69% annually.

Table 6. Average Rates of Return and Performance Gaps for Load and No-Load Funds (International Equity Funds, 2007-2016)

	Number of funds	Time- weighted annualized return	Dollar- weighted annualized return	Annualized performance gap
Legal load funds	2,335	3.20%	1.71%	1.49%
Legal no-load funds	1,266	1.93%	1.13%	0.80%
Total	3,601	2.42%	1.36%	1.07%
Load - No-Load (<i>t</i> -Statistic)				0.69% (8.93)

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

Table 7 shows the results for balanced funds, i.e., funds that invest a portion of their assets in stocks and another portion in bonds. The overall performance gap in 2007-2016 was 0.75%, and the gap for load funds exceeded the gap for no-load funds by 0.50% annually.

Table 7. Average Rates of Return and Performance Gaps for Load and No-Load Funds (Balanced Funds, 2007-2016)

	Number of funds	Time- weighted annualized return	Dollar- weighted annualized return	Annualized performance gap
Legal load funds	1,504	4.74%	3.74%	1.00%
Legal no-load funds	705	5.50%	5.00%	0.50%
Total	2,209	5.11%	4.35%	0.75%
Load - No-Load (<i>t</i> -Statistic)				0.50% (9.25)

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

Table 8 shows the results for target date funds, i.e., funds that invest in stocks, bonds, and sometimes other assets, and that shift over time toward a more conservative allocation. In contrast to our findings for other types of funds, the overall performance gaps in 2007-2016 was -0.60%, i.e., target date investors tended to time their investments such that they beat the market. Investors in load funds outperformed the market by 0.50% more than investors in no-load funds.

Table 8. Average Rates of Return and Performance Gaps for Load and No-Load Funds (Target Date Funds, 2007-2016)

	Number of funds	Time-weighted annualized return	Dollar-weighted annualized return	Annualized performance gap
Legal load funds	858	4.09%	5.14%	-1.05%
Legal no-load funds	696	5.62%	6.18%	-0.55%
Total	1,554	5.49%	6.09%	-0.60%
Load - No-Load (<i>t</i> -Statistic)				-0.50% (3.53)

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

Finally, Table 9 shows the results for bond funds, including US and international bond funds. The overall performance gap in 2007-2016 was 0.35%, and the annual gap for load funds was 0.04% larger than for no-load funds. This excess performance gap is not statistically significant.

Table 9. Average Rates of Return and Performance Gaps for Load and No-Load Funds (US Bond Funds, 2007-2016)

	Number of funds	Time-weighted annualized return	Dollar-weighted annualized return	Annualized performance gap
Legal load funds	4,576	3.98%	3.60%	0.38%
Legal no-load funds	2,087	4.12%	3.78%	0.34%
Total	6,663	4.07%	3.72%	0.35%
Load - No-Load (<i>t</i> -Statistic)				0.04% (1.58)

Excludes Retirement, Institutional, and missing share class funds.

Source: Authors' calculations based on Morningstar Direct.

Excess Performance Gaps for Load Types and Share Classes

Like Bullard et al. (2008), this section takes a closer look at the types of loads that funds charge. As noted above, legal load funds may charge a front-end load, a back-end load, or an annually recurring level load in excess of 0.25%. While it is rare for a fund to charge both a front-end and a back-end load, it is common to charge either type in combination with a level load. To facilitate comparisons with the results in the previous section, we define three mutually exclusive types of load funds: funds with a front-end load ("Any front load"), funds with a back-end load but without a front-

end load ("Any back load"), and funds with neither a front-end nor a back-end load, but with a level load in excess of 0.25% ("Level load only"). As before, the reference category consists of legal no-load funds.

Table 10 shows the results of regressions on annual performance gaps for US equity and sector funds in 2007-2016. The outcome is 100 times the gap, i.e., coefficients may be interpreted as percentage point differentials. The first column shows parameter estimates for an ordinary least squares (OLS) model with explanatory indicators for load types. The coefficient on the front-end load variable is 0.8830, i.e., investors in funds that charge a front-end load experienced a performance gap that was 0.88% worse than investors in legal no-load funds (the reference category). The excess performance gap for funds with a back-end load was 2.23%, and for funds with a level load only it was 1.41%.

Table 10. Regressions on Annual Performance Gaps of US Equity and Sector Funds (2007-2016)

	OLS	Family Fixed	OLS	Family Fixed
	(1)	Effects	(3)	Effects
	(1)	(2)	(3)	(4)
Any front load	0.8830 *** (0.0583)	1.0285 *** (0.1315)		
Any back load	2.2314 *** (0.1144)	3.1440 *** (0.1135)		
Level load only (>25bps)	1.4132 *** (0.4342)	0.2965 (0.1936)		
Class A			0.8413 *** (0.0585)	0.7447 *** (0.1130)
Class B			3.2144 *** (0.1884)	4.6143 *** (0.1162)
Class C			1.5089 *** (0.1305)	1.1541 *** (0.1130)
Class D			-0.8060 *** (0.2548)	-3.2241 *** (0.4273)
Class T			2.0820 ** (0.9232)	-1.3152 (1.0642)
Constant	0.6853 *** (0.0294)	-0.3100 *** (0.0840)	0.7057 *** (0.0296)	-0.0011 (0.0660)
# funds	9,978	3,835	9,978	4,335
# fund families		1,034		1,146

Standard errors in parentheses. Significance: ***=1%, **=5%, *=10%.

Source: Authors' calculations based on Morningstar Direct.

Separately, like Bullard et al. (2008), we distinguish share classes that charge various loads, namely classes A, B, C, D, and T. These share classes are generally sold through brokers. Class A funds tend to charge a front-end load, Class B funds a back-end load, and Class C funds a level load. Classes T and D are similar to Classes A and C, respectively, but require higher investment minimums and tend to charge

lower fees.¹⁹ However, many exceptions to these general patterns exist in the Morningstar data. The reference category consists of all other fund classes (except Institutional, Retirement, and missing classes, which are not in the analysis).

The third column of Table 10 shows coefficient estimates for an OLS model with controls for broker-sold share classes. The excess performance gap was highest for Class B shares, at 3.21% above the performance gap faced by the average investor in omitted fund classes. Class B funds tend to be subject to a back-end load, and its high excess performance gap is consistent with the large coefficient on the back-end load indicator in Column (1) and with the findings of Bullard et al. (2008) for the 1991-2004 period. Other share classes with high excess performance gaps include Classes A, C, and T. In contrast, investors in Class D funds timed their transactions well. As noted above, Class D funds typically require larger minimum investments and their investors may be more sophisticated than investors in other classes.

The regressions that control for share classes serve primarily for the convenience of readers who are more familiar with share classes than their associated charges, to draw a parallel with Bullard et al. (2008), and as robustness checks. Our focus is on specifications that control for various types of loads, as these more directly reflect broker compensation structures. The alternative specifications tell essentially the same story: relative to the omitted category, the performance gap is highest for Class B shares in the third column, which is consistent with the largest performance gap for back-end loads in the first column; lowest for Class A shares and front-end load funds; and in-between for Class C shares and level load funds. Indeed, the coefficients for the second and third of these comparisons are quite close.

The second and fourth columns show the results of models with fixed-effects for fund families. The analysis covers 9,978 US equity and sector funds. These were part of 4,266 fund families. A fund family is a collection of funds that invest in the same underlying portfolio, but are marketed as multiple share classes. For example, a fund manager may decide to market a family as class A, class B, class C, Retirement class, and Institutional class shares. Each class comes with its own fee structure, but the fund manager is the same and the assets are allocated the same as assets in other share classes. A fixed-effects model may be viewed as a model with indicator variables for every fund family, and the coefficients in the table measure the extent to which their respective effects deviate from the performance gap of the fund family's omitted category.²⁰ For example, the coefficient on the indicator for front-end load is 1.0285, i.e., funds that charge a front-end load had performance gaps that, on average, were 1.03% worse than legal no-load funds *in their fund family*.

¹⁹ We do not highlight Classes M and N because their investment minimums are very high and their loads relatively low. See the Appendix for a description of share classes.

²⁰ The coefficients of fixed-effects models are identified by intra-family differences only. Some families do not contribute to the model. For example, families with legal no-load funds only cannot help explain intra-family differences by load type in Column 2. Similarly, families that consist of legal load funds only do not help identify the effects of load types. The bottom two rows of Columns 2 and 4 show the number of funds and families that contributed to the fixed-effects models. Those numbers differ because the reference category in Column 2 (legal no-load funds) differs from that in Column 4 (share classes other than A, B, C, D, and T).

The results of the fixed-effects models tell a similar story as those of OLS models. In particular, the front-end and back-end load coefficients are positive and statistically significant, i.e., funds that charge a front-end or back-end load suffered larger performance gaps due to suboptimal timing than legal no-load funds of the same fund family.

Table 11 shows the results of similar regressions for international equity funds in 2007-2016. With the exception of the fixed-effects estimate of Class D funds, all effects are positive and significant, or statistically insignificant. Investors in international equity funds that charge a front-end load lost 0.56% more due to timing errors than their counterparts who invested in legal no-load funds (Column 1). Investors in funds that charge a back-end load, such as Class B funds tend to do, lost roughly 1.6% more to timing errors than those who invested in legal no-load funds.

Table 11. Regressions on Annual Performance Gaps of International Equity Funds (2007-2016)

	Family Fixed		Family Fixed	
	OLS	Effects	OLS	Effects
	(1)	(2)	(3)	(4)
Any front load	0.5601 *** (0.0802)	0.4606 *** (0.1189)		
Any back load	1.6033 *** (0.1773)	1.3716 *** (0.1023)		
Level load only (>25bps)	0.4165 (0.7782)	-0.1191 (0.1660)		
Class A			0.6961 *** (0.0817)	0.4209 *** (0.1169)
Class B			1.6825 *** (0.3185)	1.9675 *** (0.1186)
Class C			1.2989 *** (0.1929)	0.8127 *** (0.1168)
Class D			-0.8631 (0.5433)	-2.3790 *** (0.7339)
Class T			2.8778 (2.5950)	0.2624 (5.0239)
Constant	0.8002 *** (0.0479)	0.5868 *** (0.0771)	0.7775 *** (0.0471)	0.6185 *** (0.0685)
# funds	3,601	1,433	3,601	1,650
# fund families		380		441

Standard errors in parentheses. Significance: ***=1%, **=5%, *=10%.

Source: Authors' calculations based on Morningstar Direct.

Table 12 shows results for balanced funds. Consistent with the results for other types of funds, excess performance gaps associated with back-end load funds and Class B funds tended to be worse than those of other load types or broker-sold share classes.

Table 12. Regressions on Annual Performance Gaps of Balanced Funds (2007-2016)

	Family Fixed		Family Fixed	
	OLS	Effects	OLS	Effects
	(1)	(2)	(3)	(4)
Any front load	0.4681 *** (0.0596)	-0.0255 (0.1635)		
Any back load	0.6106 *** (0.0819)	1.3167 *** (0.1406)		
Level load only (>25bps)	0.1257 (0.3683)	-0.2517 (0.2471)		
Class A			0.2525 *** (0.0614)	-0.0492 (0.1346)
Class B			0.9808 *** (0.1552)	2.3783 *** (0.1331)
Class C			0.2912 *** (0.0865)	0.2322 * (0.1339)
Class D			0.1483 (0.4473)	-0.2779 (0.6048)
Class T			-0.3896 (1.4605)	-1.6967 (2.2128)
Constant	0.4955 *** (0.0391)	0.4968 *** (0.1066)	0.6018 *** (0.0385)	0.4835 *** (0.0810)
# funds	2,209	928	2,209	1,009
# fund families		240		259

Standard errors in parentheses. Significance: ***=1%, **=5%, *=10%.

Source: Authors' calculations based on Morningstar Direct.

Table 13 shows results for target date funds. As shown in Table 7 above, investors in load target date funds did not experience worse timing-related performance gaps than investors in legal no-load target date funds, which is an anomaly compared with other fund types. The first column of Table 13 confirms that finding for funds with front-end loads. However, the family fixed-effects estimates for all three load types indicate that timing errors were worse for load funds than for legal no-load funds in their family, suggesting that the observed anomaly may be due to unobserved characteristics of fund families that consist exclusively of load funds or exclusively of no-load funds. Similarly, Column 3 shows that investors in Class A tended to time their purchases and sales well, but the corresponding fixed effects result in Column 4 is statistically insignificant, while also pointing at excess timing errors for share classes B, C, and T.

Table 13. Regressions on Annual Performance Gaps of Target Date Funds (2007-2016)

	Family Fixed		Family Fixed	
	OLS	Effects	OLS	Effects
	(1)	(2)	(3)	(4)
Any front load	-0.6437 *** (0.1545)	0.5144 *** (0.1460)		
Any back load	0.3705 (0.3742)	1.3805 *** (0.1379)		
Level load only (>25bps)	-0.3798 (0.5465)	1.5605 *** (0.3348)		
Class A			-0.7014 *** (0.1607)	0.1004 (0.1164)
Class B			0.6523 (0.8977)	2.0607 *** (0.1389)
Class C			0.0975 (0.6280)	0.9072 *** (0.1207)
Class D			2.5378 (3.4122)	-0.6428 (1.0490)
Class T			1.4124 (16.3935)	1.1836 ** (0.5115)
Constant	-0.5539 *** (0.0412)	-1.4170 *** (0.0902)	-0.5537 *** (0.0408)	-1.1779 *** (0.0750)
# funds	1,554	758	1,554	848
# fund families		210		231

Standard errors in parentheses. Significance: ***=1%, **=5%, *=10%.

Source: Authors' calculations based on Morningstar Direct.

Finally, Table 14 shows estimates for bond funds. Table 9 above indicated that the excess performance gap for load bond funds was small and statistically insignificant. The OLS estimates largely confirm this, with mostly insignificant estimates. However, the fixed-effects estimates tend to be negative, suggesting that investors in single-fund or homogeneous families (which are excluded from the fixed-effects models) suffered an excess performance gap that was offset by fortuitous timing by investors in load members of pluralistic fund families.

Table 14. Regressions on Annual Performance Gaps of Bond Funds (2007-2016)

	Family Fixed		Family Fixed	
	OLS	Effects	OLS	Effects
	(1)	(2)	(3)	(4)
Any front load	0.0178 (0.0306)	-0.3968 *** (0.0534)		
Any back load	0.1649 *** (0.0521)	-0.4034 *** (0.0478)		
Level load only (>25bps)	-0.1227 (0.1285)	-0.3407 *** (0.0957)		
Class A			-0.0598 ** (0.0303)	-0.3546 *** (0.0515)
Class B			0.1291 (0.1160)	-0.1906 *** (0.0556)
Class C			-0.0137 (0.0522)	-0.4110 *** (0.0521)
Class D			-0.0260 (0.1160)	-0.1198 (0.1229)
Class T			-0.2664 (0.4699)	-0.1402 (1.2083)
Constant	0.3382 *** (0.0162)	0.6531 *** (0.0345)	0.3691 *** (0.0166)	0.5803 *** (0.0307)
# funds	6,663	2,612	6,663	2,842
# fund families		730		766

Standard errors in parentheses. Significance: ***=1%, **=5%, *=10%.

Source: Authors' calculations based on Morningstar Direct.

4. DISCUSSION

The Period from 1991 through 2004

Based on data from January 1991 through December 2004, Friesen and Sapp (2007) and Bullard et al. (2008) documented that the average investor was harmed by suboptimal timing of purchases and sales. Their conclusion is consistent with a body of literature on behavioral biases in investment behavior (e.g., Baker and Ricciardi, 2014). Friesen and Sapp showed that a tendency to sell below-average performing funds (and random behavior with respect to above-average performing funds) could generate the observed timing errors. Such behavior may reflect an inherent bias, or it may reflect forced sales of shares to meet margin calls—an obligation on investors who trade with borrowed money to deposit additional money or securities.

Friesen and Sapp (2007) also showed that timing errors were worse for investments in load funds than in no-load funds. Bullard et al. (2008) confirmed that finding and provided more detail for Class A, B, and C funds. Load funds are generally sold through brokers. The studies do not explain why broker-sold funds were particularly vulnerable to timing errors. To the extent that investments with borrowed money are more common among investors who are advised by brokers than among other investors, a potential explanation lies in forced sales due to margin calls.

Using a different data source, we independently verified key elements of the findings of Friesen and Sapp (2007) and Bullard et al. (2008). We agree that their method is sound and concurrence with our results suggests that it was properly implemented. That said, we note several issues.

- The headline results of Friesen and Sapp (2007) represent averages across funds, without weighting. For example, their abstract states “Over 1991–2004, equity fund investor timing decisions reduce fund investor average returns by 1.56% annually.” However, they also found that the performance gap increased with fund size, so that timing errors reduce returns on aggregate investments by more than 1.56%. Based on their fund-quintile results (replicated in Table 1 above), we estimate that their asset-weighted performance gap was 0.19% per month, or about 2.3% per year. (Our independent estimate of the asset-weighted performance gap was also 0.19% per month.)
- Our analysis revealed that the performance gaps of some funds were quite large in absolute value. The assets under management of such funds fluctuated substantially over time. For example, assets could drop by 99% over a couple of months and rebound later. As a result, dollar-weighted returns deviated markedly from time-weighted returns, in either direction. Fortunately, these outlier funds were generally small and their effect on the asset-weighted average performance gap was minimal. However, they affected unweighted averages. Friesen and Sapp (2007) did not discuss such outliers; it is possible that they excluded certain outliers, which would explain why our analysis covered slightly more funds than theirs.
- Some transfers between funds take place without active buy and sell decisions of investors. For example, some funds automatically convert investor holdings into a lower-cost share class when the investor’s holdings exceed a threshold. Similarly, some funds lowered the minimum balance requirements of their share classes and transferred large portions of one fund into another.²¹ These types of transfers show up as changes in assets under management and the calculation of dollar-weighted returns treats them in the same manner as active purchases or sales. Insofar we are aware, the data do not permit separating automatic from other transfers. In the (asset-weighted)

²¹ Automatic transfers also take place when funds merge. Like Friesen and Sapp (2007), we unraveled fund mergers prior to calculating returns. For example, suppose Fund A was acquired by Fund B, and the funds were equal-sized just prior to the merger. We then extend the monthly data for Fund A beyond the merger: the rates of return are equal to those of Fund B, and one-half of the assets of Fund B would be allocated to Fund A. Without such unraveling, it would appear that investors in Fund A had sold their shares in Fund A and purchased Fund B, whereas in reality no such transactions took place.

- aggregate, the effect of automatic transfers is presumably small. Also, if the affected share classes have the same load structure, the effect on average performance gap by load type is presumably small. However, the issue may affect performance gaps if, for example, load shares are converted into no-load shares. So long as the timing of automatic transfers is random, we expect the magnitude of any such effect to be small.
- Like Friesen and Sapp (2007), we assumed that cash flows take place at the end of the month. We confirmed that the aggregate results change little when the beginning or middle of the month is assumed instead. For individual funds it can make a difference, namely when the rate of return during a month with large flows is extraordinarily low or high.

The Period from 2007 through 2016

We calculated performance gaps for various types of funds during the 10-year period ending at the end of 2016, both overall and separately for legal load funds and legal no-load funds—see Table 5 through Table 9 above. We extended the analysis to sector equity funds, international equity funds, balanced funds, target date funds, and bond funds. Separately, in order to better compare investors who are assisted by brokers and investors who invest directly, we excluded Institutional class funds, Retirement class funds, and fund with missing share class.

Excess performance gaps of investors in load funds over those in legal no-load funds varied by type of fund. For the largest category of funds—US equity and sector funds—the excess gap of load funds over no-load funds was 1.12% annually in 2007-2016. In other words, the timing of purchases and sales was worse for investors who traded with the assistance of brokers than for investors without brokers, and the excess timing errors reduced their returns on investment by 1.12 percentage points. Excess performance gaps were smaller for international equity and balanced funds, negative for target date funds, and there was no statistically significant difference for bond fund investors.

The losses due to excess timing errors are substantial. Excluding Institutional class funds, Retirement class funds, and funds with missing share classes, US equity funds managed \$3.5 trillion at the end of 2016, of which \$881 billion was subject to a front-end load, a back-end load, or a level load in excess of 0.25% (see Table 4). Similarly, sector equity load funds managed \$90 billion, for a combined total of \$970 billion (rounded). Excess timing errors thus reduced investment earnings in these funds by $1.12\% \times \$970 \text{ billion} = \10.8 billion (rounded). Lost earnings were \$2.3 billion for international equity funds, \$2.7 billion for balanced funds, negative \$0.3 billion for target date funds, and 0.3 billion for bond funds (see Table 15). Total lost earnings due to excess timing errors in analyzed funds thus amounted to \$15.9 billion in 2016. At a confidence level of 95%, the margin of error around this figure is \$1.3 billion, i.e., with 95% confidence, lost earnings were between \$14.5 billion and \$17.2 billion in 2016. Similar losses are incurred every year, in proportion to assets under management.

Table 15. Annual Lost Earnings Due to Excess Performance Gaps, by Fund Type (2016)

	Affected assets under management	Excess performance gap	Lost earnings
US equity and sector funds	\$970 bn	1.12%	\$10.8 bn
International equity funds	\$338 bn	0.69%	\$2.3 bn
Balanced funds	\$531 bn	0.50%	\$2.7 bn
Target date funds	\$54 bn	-0.50%	-\$0.3 bn
Bond funds	\$622 bn	0.04%	\$0.3 bn
Total	\$2,515 bn		\$15.9 bn

Source: Authors' calculations based on Morningstar Direct.

Funds may charge several types of loads: front-end loads that are charged at the time of purchase, back-end loads that are charged at the time of sale, and level loads that are charged annually throughout the time that the investor owns fund shares. Through regression analyses, we distinguished these three types separately from legal no-load funds. Similarly, we compared share classes of broker-sold funds to direct-sold funds. The results show that investors in funds that charge any type of load experienced timing errors that were worse than investors in legal no-load funds. Among US equity and sector funds, the excess performance gap was 0.88% for funds with a front-end load and 2.23% for funds with a back-end load. Among international equity funds the excess performance gaps were 0.56% (front-end load) and 1.60% (back-end load). The excess gaps for funds with a level load only were generally positive for equity funds, but not always statistically significant. Share classes A, B, and C were associated with particularly large excess performance gaps. The results generally held up in models with fixed effects for fund families, i.e., brokerage clients made worse timing errors than other investors in fund families that serve clients through different sales channels with the same investment strategy.

Robustness Checks

The analysis discussed above demonstrates that investors in load funds lost \$15.9 billion in 2016 due to the extent by which their timing errors were worse than those of investors in no-load funds. This result relies on a number of analysis choices. Most importantly, our analysis excludes Institutional class funds, Retirement class funds, and funds with missing share class; considers the period from January 2007 through December 2016; and compares legal load funds to legal no-load funds. This section presents the results of alternative approaches. Each alternative specification starts anew from the baseline (Table 15) and makes one change only, i.e., the changes are not cumulative.

First, Table 16 summarizes annualized excess performance gaps and lost earnings when Institutional class funds, Retirement class funds, and funds with missing share class are included in the analysis. Relative to the baseline analysis (Table 15), the excess performance gap of US equity and sector funds increases, while the excess gaps of international equity and balanced funds decrease. Total affected assets under management are slightly greater, mostly because some Retirement class funds charge a level load in excess of 0.25%. In this scenario, total lost earnings due to excess timing errors amounted to \$18.4 billion in 2016.

Table 16. Annual Lost Earnings Due to Excess Performance Gaps, by Fund Type (2016): Includes Institutional Class, Retirement Class, and Funds with Missing Share Class

	Affected assets under management	Excess performance gap	Lost earnings
US equity and sector funds	\$1,015 bn	1.50%	\$15.3 bn
International equity funds	\$356 bn	0.54%	\$1.9 bn
Balanced funds	\$543 bn	0.42%	\$2.3 bn
Target date funds	\$85 bn	-0.39%	-\$0.3 bn
Bond funds	\$633 bn	-0.12%	-\$0.8 bn
Total	\$2,632 bn		\$18.4 bn

Analysis includes Institutional class, Retirement class, and funds with missing share class.

Source: Authors' calculations based on Morningstar Direct.

Second, Table 17 summarizes annualized excess performance gaps and lost earnings based on an alternative comparison of load and no-load funds. In this comparison, load funds consist of funds that charge a front-end or a back-end load, and no-load funds consists of all other funds. This definition is consistent with Friesen and Sapp (2007). It differs from our baseline comparison of Table 15 in that funds with a level load above 0.25% (and without front- or back-end loads) are now in the reference category. As a consequence, the affected assets under management are slightly less than in the baseline scenario. Excess performance gaps were nearly identical to those in the baseline, and total lost earnings due to excess timing errors amounted to \$15.7 billion in 2016.

Table 17. Annual Lost Earnings Due to Excess Performance Gaps, by Fund Type (2016): Comparison Category Defined as Funds with a Front-End or Back-End Load

	Affected assets under management	Excess performance gap	Lost earnings
US equity and sector funds	\$962 bn	1.11%	\$10.7 bn
International equity funds	\$336 bn	0.69%	\$2.3 bn
Balanced funds	\$521 bn	0.51%	\$2.6 bn
Target date funds	\$53 bn	-0.50%	-\$0.3 bn
Bond funds	\$615 bn	0.05%	\$0.3 bn
Total	\$2,488 bn		\$15.7 bn

Analysis compares funds with a front-end or back-end load to funds that charge neither.

Source: Authors' calculations based on Morningstar Direct.

The third alternative specification also changes the comparison categories. In this comparison, load funds consist of funds that charge a front-end, a back-end, or a level load, irrespective of the magnitude of the loads. The reference category consists of pure no-load funds. The difference with our baseline approach of Table 15 lies in the treatment of funds with a nonzero level load up to 0.25% (and without a front- or back-end load). In the baseline, such funds were in the reference category, and in the third scenario, they are considered load funds. As a consequence, the affected assets under management are greater than they are in the baseline model. Excess performance gaps were smaller than in the baseline, and total lost earnings amounted to \$16.6 billion in 2016.

Table 18. Annual Lost Earnings Due to Excess Performance Gaps, by Fund Type (2016): Comparison Category Defined as Funds with Any Type of Load

	Affected assets under management	Excess performance gap	Lost earnings
US equity and sector funds	\$1,239 bn	0.98%	\$12.2 bn
International equity funds	\$391 bn	0.64%	\$2.5 bn
Balanced funds	\$620 bn	0.41%	\$2.6 bn
Target date funds	\$99 bn	-0.58%	-\$0.6 bn
Bond funds	\$789 bn	-0.01%	-\$0.1 bn
Total	\$3,139 bn		\$16.6 bn

Analysis compares funds with any load to pure no-load funds.

Source: Authors' calculations based on Morningstar Direct.

Finally, Table 19 summarizes annualized excess performance gaps and lost earnings based on a 17-year period (2000-2016) instead of on the 10-year period (2007-2016) in the baseline scenario of Table 15. Performance gaps depend, of course, on the period under study. Over a very short period, the gap is necessarily very small because most investors do not trade in that short period and thus hold their investments throughout the entire period. Gaps can become larger over longer periods and be positive or negative, without a monotonic pattern. As shown in Table 19, the annualized excess performance gaps for US equity and sector funds and for balanced funds were wider in 2000-2016 than in 2007-2016, whereas for international equity funds the annualized gap was narrower. Total lost earnings amounted to \$17.2 billion in 2016.

Table 19. Annual Lost Earnings Due to Excess Performance Gaps, by Fund Type (2016): Based on 2000-2016

	Affected assets under management	Excess performance gap	Lost earnings
US equity and sector funds	\$970 bn	1.30%	\$12.6 bn
International equity funds	\$338 bn	0.08%	\$0.3 bn
Balanced funds	\$531 bn	0.87%	\$4.6 bn
Target date funds	\$54 bn	-0.33%	-\$0.2 bn
Bond funds	\$622 bn	-0.02%	-\$0.1 bn
Total	\$2,515 bn		\$17.2 bn

Analysis based on monthly returns and invested assets in 2000-2016.

Source: Authors' calculations based on Morningstar Direct.

In short, our baseline estimate of lost earnings due to excess timing errors by investors in load funds—\$15.9 billion in 2016—appears to be robust to alternative analysis approaches and toward the lower end of a range of estimates.

5. CONCLUSION

This study replicates a 2007 analysis of performance gaps due to errors that investors made while timing their purchases and sales of mutual fund shares in 1991-2004. Other studies have since analyzed investors' ability to time the market, and some evaluated differences between broker-sold and other funds. For example, Bergstresser et al. (2009) studied mutual fund performance in funds distributed through brokers and concluded that "the aggregate broker channel does not exhibit market timing skill when measured on its own relative to the market." Based on Canadian data from 2001 to 2010, Foerster et al. (2014) found "little evidence of superior stock-picking or market-timing abilities" using financial advisers. Using the same techniques as Friesen and Sapp (2007), Navone and Pagani (2015) compared performance gaps of load and no-load funds in the same fund family for 1999-2011. Consistent with Bullard et al. (2008) and our analysis, they found larger excess gaps for investors in funds with a back-end load than in funds with a front-end load, though a multivariate regression that controlled for fund flows reversed the differential for funds with a back-end load.²² Finally, also using the same techniques as Friesen and Sapp (2007), Muñoz and Vicente (2017) studied the timing skills of mutual fund investors by level of investor sophistication. They defined more sophisticated investors as those "who invest in funds with a lower net expense ratio, a lower level of fees, no-load funds, institutional funds and funds with a lower turnover ratio." They found that more sophisticated investors have better timing skills.

In conclusion, the literature and our own analysis agree that investors in load funds generally exhibit poorer timing skills than investors in no-load funds. It is possible that the difference is related to conflicts of interest: given that brokers' compensation is triggered by purchases of front-end load funds or sales of back-end load funds, it is not in the immediate financial interest of a broker to discourage trades. However, it is also possible that investors who trade through brokers are highly unsophisticated; that, left to their own devices, they would make huge timing errors; and that brokers help them avoid some (but by no means all) errors. Regardless of the underlying causes, excess timing errors reduce the investment earnings of investors in load funds by roughly \$16 billion annually.

²² The magnitude of their excess performance gaps is smaller than ours, presumably because they calculated performance gaps for single years. We explored annual gaps and generally found them tend to be much smaller than (annualized) gaps calculated on a multi-year period, presumably because more investments are "buy-and-hold" over shorter periods than over longer periods.

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APPENDIX: SHARE CLASS TYPE DESCRIPTIONS

This appendix is based on Morningstar Direct.

Shares of a fund may be offered in different classes, corresponding to different shareholder rights and obligations, such as different fee and load charges. Common share classes are A (front-end load), B (deferred fees), and C (no sales charge and a relatively high annual 12b-1 fee, such as 1.00%). Multi-class funds hold the same investment portfolio for all classes, and differ only in their surrounding fee structure.

Share Class – A

Funds that have lower investment minimums and carry a front-load to pay the advisors' sales commission. Front-load discounts are usually available if the investor meets a higher minimum initial purchase. Also known as 1, I or One. Typically, the maximum front load is between 4% and 5.75%, the maximum deferred load is zero, the maximum 12b-1 fee is between 0 and 50 bps and the investment minimum is \$2,500 or less.

Share Class – No Load

Funds without front- or back-end sales charges. Purchased directly by investors or through advisors. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 0 and 100 bps, and the investment minimum is \$2,500 or less.

Share Class – Adv

Funds typically purchased through advisors, but generally requiring a higher minimum investment. Also known as Adv or Advisor. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 0 and 50 bps, and the investment minimum is \$2,500 or less.

Share Class – B

Funds that have lower investment minimums and carry a deferred-load sales charge, also called a surrender charge. The sales charge is imposed if shares are redeemed before specified time periods, typically within five years. The sales charge decreases with the time invested such that the surrender charge is higher in year one than it is in year five. Also known as 2, II, or Two. Typically, the maximum front load is 0%, the maximum deferred load is between 4% and 5%, the maximum 12b-1 fee is between 75 and 100 bps, and the investment minimum is \$2,500 or less.

Share Class – C

Funds that have lower investment minimums and carry a level-load structure. This sales charge is typically a recurring fee of 1% that is used on an annual basis to compensate advisors. Investment minimums for C- shares tend to be lower than for D-shares. Also known as 3, III, or Three. Typically, the maximum front load is 0% and occasionally 1%, the maximum deferred load is 1% and occasionally 0%, the maximum 12b-1 fees is between 75 and 100 bps, and the investment minimum is \$2,500 or less.

Share Class – D

Funds that have lower investment minimums and carry a level-load structure. This sales charge is typically a recurring fee of 1% that is used on an annual basis to compensate advisors. Investment minimums for C- shares tend to be lower than for D-shares. Typically, the maximum front load is 0%, the maximum deferred load is 0% and occasionally 1%, the maximum 12b-1 fee is 0% and occasionally between 1 and 50 bps, and the investment minimum is \$2,000 or more.

Share Class – Inst.

Funds typically purchased by large institutional buyers, such as pension plans. Also known as Y, I, Z, X, Inst, Instl. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is 0%, and the investment minimum is \$25,000 or more.

Share Class – M

Typically, M shares carry lower front-end loads than A shares and are available to investors with larger initial investments. Typically, the maximum front load is sometimes 0% and sometimes between 1% and 3.5%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 25 bps and 100 bps, and the investment minimum is \$50,000 or more.

Share Class – N

Typically, N shares are available to investors with larger initial investments. Many also charge a 12b-1 fee. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 25 and 50 bps, and the investment minimum is \$50,000 or more.

Share Class – Other

Funds not elsewhere classified. This category contains fewer than 5% of all funds. Also known as most other share class letters. The maximum front load varies, the maximum deferred load varies, the maximum 12b-1 fee varies, and the investment minimum varies.

Share Class – Retirement

Funds available through retirement plans. Purchased by retirement plan participants, usually without any sales loads. Also known as Ret, R, K, and J. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 25 and 50 bps, and the investment minimum varies.

Share Class – S

S share classes are similar to no-load funds in that there is usually no front or deferred load charged. However, investment minimums may be slightly higher. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is 0%, and the investment minimum is \$2,000 or more.

Share Class – T

Typically, T shares carry lower front-end loads than A shares and are available to investors with larger initial investments. Typically, the maximum front load is 0% and sometimes between 3% and 4.75%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 25 bps and 50 bps, and the investment minimum is \$2,000 or more.

Share Class – Inv

Investor share classes can be purchased by individual investors, so there is usually no front or deferred load charged. However, investment minimums may be slightly higher. Also known as Investor or Investment. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 1bp and 25 bps, and the investment minimum is \$10,000 or less.

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