Community Banking

in the 21st Century

The Effects of Competition in Consumer Credit Markets

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Does not necessarily reflect the views of the Federal Reserve System or the Board of Governors







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What happens when competition increases in the financial system?

Good	Bad
More efficient intermediation	Less profits and lower franchise value
Lower borrowing costs and higher deposit rates	Lenders take more risks
More stability	Less stability







Evidence is mixed

• Competition made banks more resilient in period around the Depression

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- Competition helped cause the Depression
- Competition helped cause the 2008-2009 crisis







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Hard problem to crack!

Lenders do not randomly enter local markets







Our approach: Low Income Rule for Credit Unions

• Take deposits from anyone

• Make loans to anyone

Eligible for supplemental capital









Criteria: 1994-2008

• Credit union had **to apply**

Show that median household income of membership<80% of household national median income

 Make adjustments for high cost areas using administrative data from the Employment and Training Administration of the Department of Labor

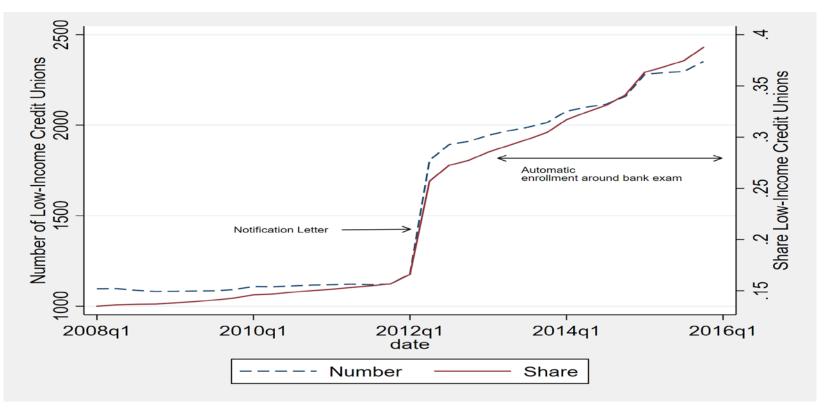




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After 2008: Automatic enrollment at time of bank exam



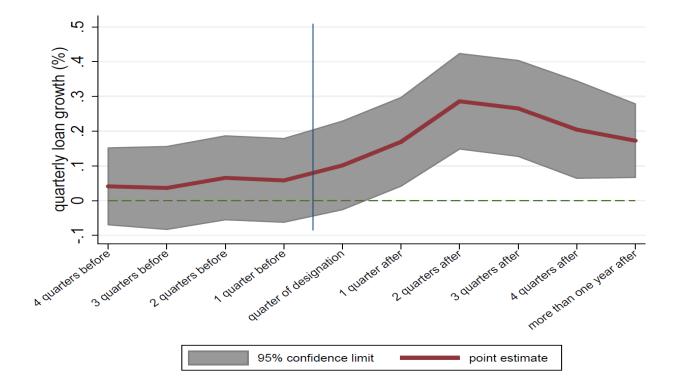




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Lending growth at CUs after LI status



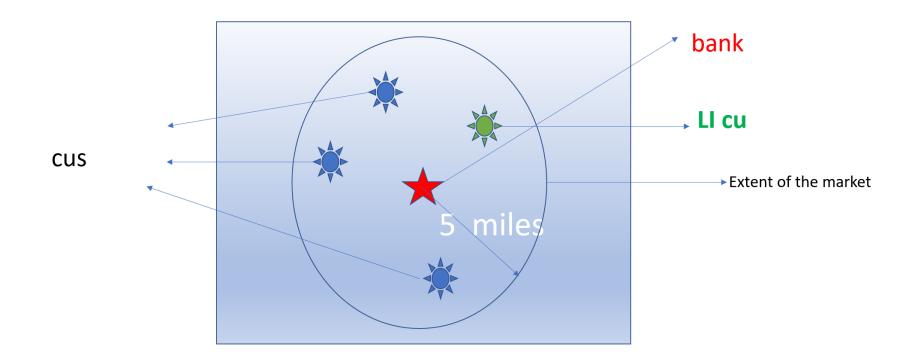




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measuring the CB bank response

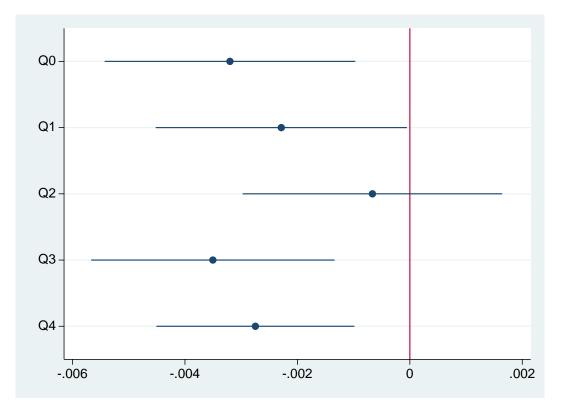




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CBs contract aggregate lending









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Impact of LICU

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Cars, credit unions, banks and nonbanks

competition				
		Panel A: all		
	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks
Four quarters	0.027***	0.019**	0.0070	0.042***
	(0.0052)	(0.0093)	(0.0094)	(0.0061)
Observations	557828	557828	557828	557828





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Competition and a subprime credit expansion

Panel B: 1st quartile in Equifax Risk Score

	(1) all institutions	(2) credit unions	(3) banks	(4) non-banks
Four quarters	0.067*** (0.0082)	0.044 *** (0.014)	0.021 (0.015)	0.081*** (0.0088)
Observations	557828	557828	557828	557828





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	Panel C: 2	and quartile in Equifax R	isk Score	
	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks
Four quarters	0.035***	0.062***	0.0096	0.047***
	(0.0085)	(0.013)	(0.014)	(0.010)
Observations	557828	557828	557828	557828
	Panel D: 3	Brd quartile in Equifax R	isk Score	
	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks
Four quarters	0.030***	0.011	0.018	0.058***
	(0.0082)	(0.013)	(0.012)	(0.011)
	557828	557828	557828	557828
	Panel E: 4	Ith quartile in Equifax Ri	sk Score	
Prime borrowers	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks
Four quarters	-0.0011	-0.0028	-0.0051	0.016
	(0.0084)	(0.013)	(0.013)	(0.011)
Observations	557828	557828	557828	557828





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Credit Misallocation?

	log number of non-performing auto loans in 2017							
	1st quartile in Equifax Risk Score			2nd quartile in Equifax Risk Score				
	(1)	(2)	(3)	(4)	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks	all institutions	credit unions	banks	non-banks
Change in number of designated credit unions	1.19***	0.71***	0.54***	1.13***	0.38***	0.100***	0.10***	0.28***
(2010 - 2013)	(0.12)	(0.073)	(0.071)	(0.12)	(0.058)	(0.023)	(0.030)	(0.054)
Observations	23346	23346	23346	23346	23346	23346	23346	23346
R-squared	0.180	0.104	0.103	0.195	0.145	0.038	0.047	0.144
	3rd quartile in Equifax Risk Score			4th quartile in Equifax Risk Score				
	(1)	(2)	(3)	(4)	(1)	(2)	(3)	(4)
	all institutions	credit unions	banks	non-banks	all institutions	credit unions	banks	non-banks
Change in number of designated credit unions	0.048**	0.0074	0.014	0.031*	0.0079	0.00079	-0.0012	0.0086
(2010 - 2013)	(0.018)	(0.0070)	(0.0091)	(0.016)	(0.0068)	(0.0021)	(0.0011)	(0.0068)
Observations	23346	23346	23346	23346	23346	23346	23346	23346
R-squared	0.064	0.008	0.013	0.058	0.013	0.002	0.004	0.010









Conclusion

NCUA deregulation increased CU "entry" and competition in local consumer credit markets

CBs accommodate entry by shifting to C&I lending.

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Non-banks and CUs compete for market share and sharply expand subprime auto-lending

Sub prime consumers benefit, but is credit misallocated?



