

"A gloriously life affirming film ..."



... and one of the best depictions of banking in Hollywood history as well!

Accurate description of traditional banking



- Deposit taking
- Loan making
- Short-term vs long-term liabilities
- A bank run
- Equity injection to confront the run

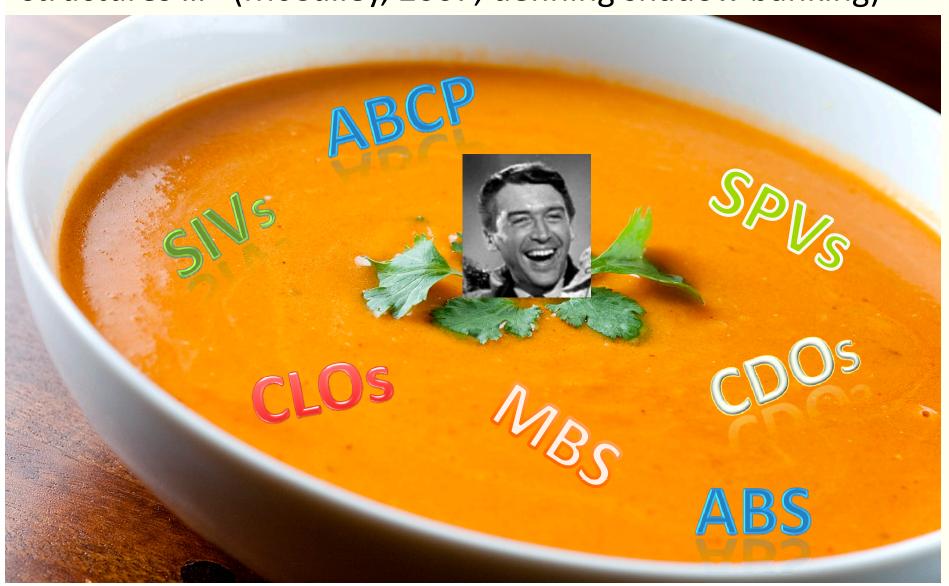
• ...

There is even a bank examiner ...



How would you do a modern remake?

Jimmy Stewart swimming in the "... whole alphabet soup of levered up non-bank investment conduits, vehicles, and structures ..." (McCulley, 2007, defining shadow banking)



How has financial intermediation evolved?

- Who does intermediation?
- Are banks regulated intermediaries still central to the process?
- To what extent has intermediation activity instead moved "in the shadow"?

A contribution to this debate

FEDERAL RESERVE BANK OF NEW YORK

July 2012

ECONOMIC POLICY REVIEW

SPECIAL ISSUE:

The Evolution of Banks and Financial Intermediation

July 2012

- 1. The Evolution of Banks and Financial Intermediation: Framing the Analysis
 Nicola Cetorelli, Benjamin H. Mandel, and Lindsay Mollineaux
- **2.** *Regulation's Role in Bank Changes* Peter Olson
- 3. The Rise of the Originate-to-Distribute Model and the Role of Banks in Financial Intermediation

Vitaly M. Bord and João A. C. Santos

4. The Role of Bank Credit Enhancements in Securitization

Benjamin Mandel, Donald Morgan, and Chenyang Wei

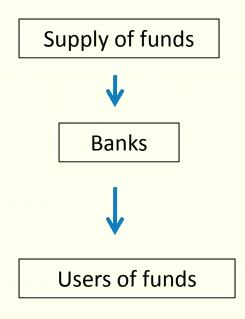
- **5.** The Role of Banks in Asset Securitization Nicola Cetorelli and Stavros Peristiani
- 6. A Structural View of U.S. Bank Holding Companies

Dafna Avraham, Patricia Selvaggi, and James Vickery

7. Heterogeneity among Larger Bank Holding Companies: 1994 to 2010
Adam Copeland

It used to be simple

Traditional model. Banks are the main brokers in the process of credit intermediation



Intermediation activity on banks' balance sheet

New model of intermediation. Two views.

1. Technology changes, new entities and 'Credit Intermediation Chain' markets emerge and replace banks Commercial banks Mortgage finance companies Loan Origination • Consumer finance companies Supply of funds • ABCP conduits (single-seller) · ABCP conduits (multi-seller) Loan • SPVs **Shadow** Warehousing **Banks** system • SIVs • SPVs structured by securities Securitisation/ Arrangement companies Users of funds Money market funds (MMFs) Distribution/ Hedge funds Wholesale Commercial banks Funding Banks lose centrality and become less relevant

FEDERAL RESERVE BANK of NEW YORK

New model of intermediation. Two views.

2. Technology changes, new entities and 'Credit Intermediation Chain' markets emerge, but banks adapt Commercial banks Mortgage finance companies Loan • Consumer finance companies Origination Supply of funds • ABCP conduits (single-seller) · ABCP conduits (multi-seller) Loan • SPVs **Shadow** Warehousing **Banks** system • SIVs • SPVs structured by securities Securitisation/ Arrangement companies Users of funds • Money market funds (MMFs) Distribution/ Hedge funds Wholesale Banks remain an integral part in the Commercial banks Funding new model of intermediation

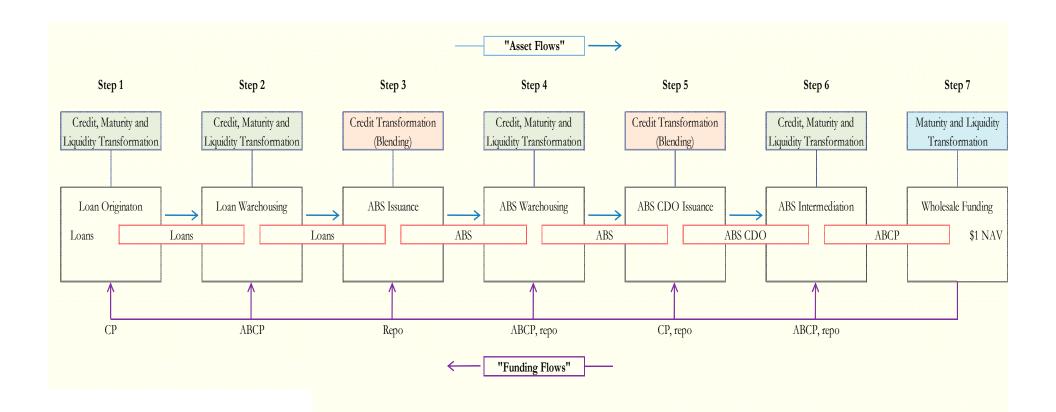
Very different implications depending on what is the "correct" view

- Differences in monitoring and regulatory approaches depending on whether:
 - Shadow banking starts and develops "independently"
 - Banks and shadow banks are intimately connected.

Implications of shadow financial intermediation

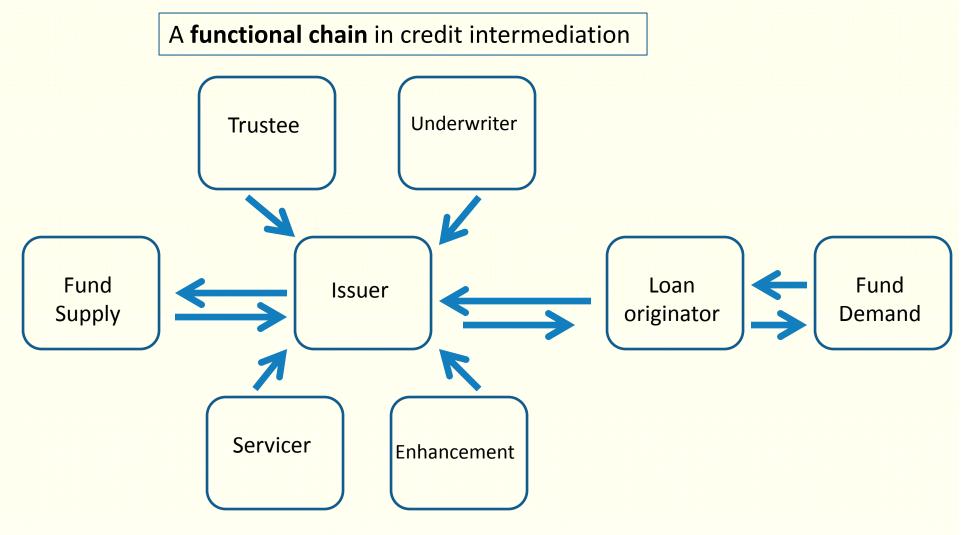
- What is the role of regulated intermediaries?
- Should we expand the boundaries of regulatory oversight?
- Moving target? Regulation itself may spur growth of new shadow markets and activities
- If intermediation done outside of regulated entities, should we extend scope of government guarantees?

The modern credit intermediation chain



From: Poszar, Adrian, Aschraft and Boesky, "Shadow Banking", 2010

New map of financial intermediation

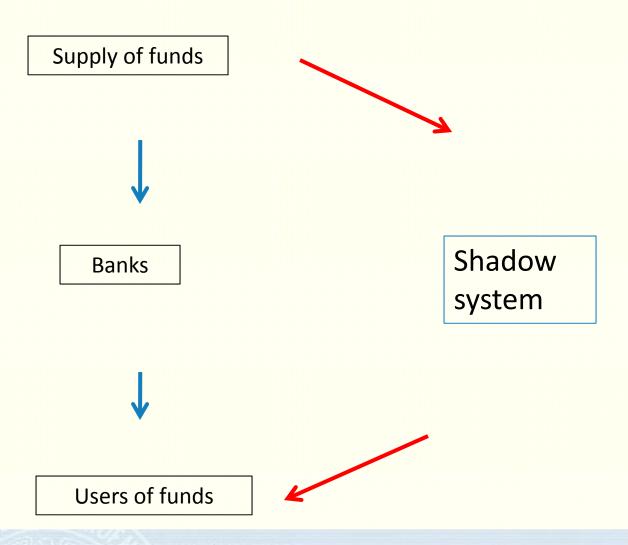


Map morphologically equivalent to Poszar et al (2010). It stresses *roles / functions* rather than *steps / markets* along the chain.

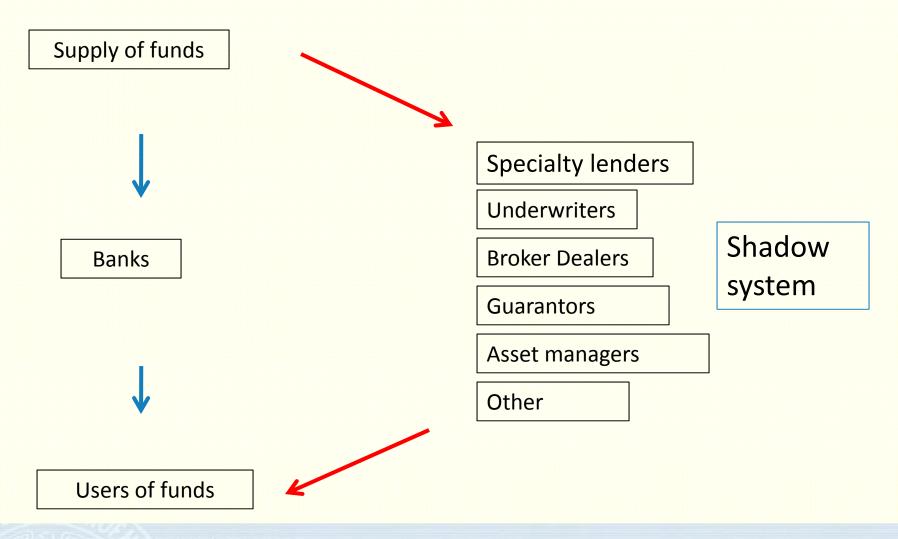
A new framework of analysis. Two-prongs approach

- 1. Role-based analysis. Modern intermediation requires "new" roles along the intermediation chain. Who offers those roles?
- 2. Entity-based analysis. Adaptation by banks through organizational changes: expand the boundaries of the banking firm. Incorporation of non-bank, specialized intermediaries under common ownership and control. Shift focus from commercial bank to bank holding company.

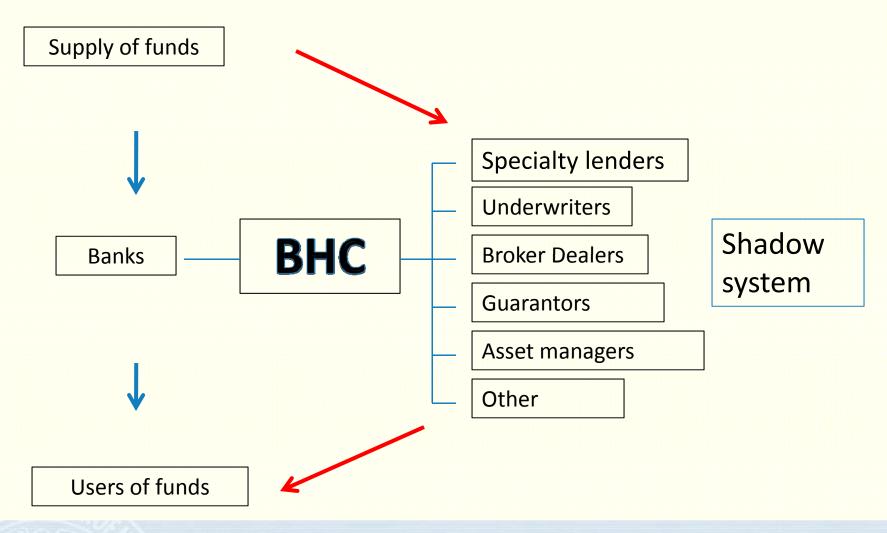
Expansion of the boundaries of the banking firm



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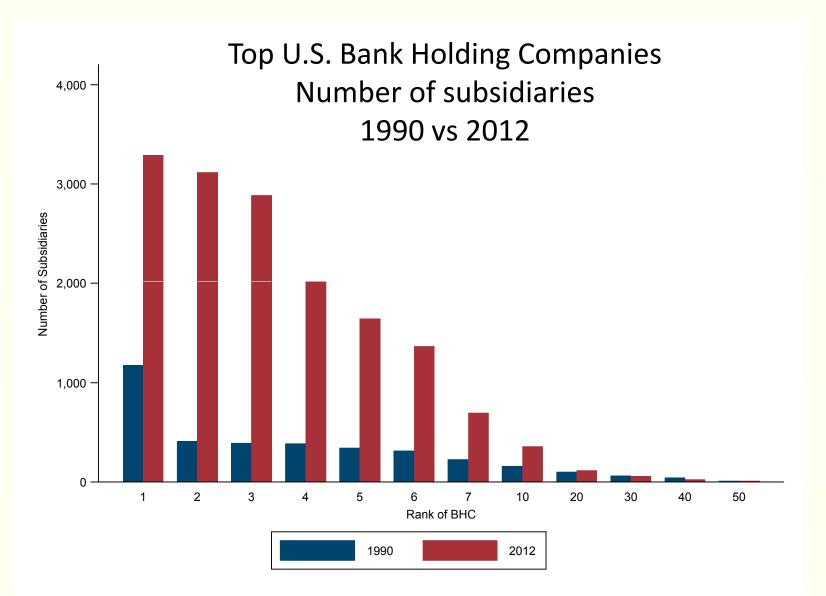
BHCs organizational structure in 2012

Number and Distribution of Subsidiaries: Selected Top 50 Bank Holding Companies

			Nui	nber	Asset value			
BHC rank	BHC Name	Domestic				Domestic	Consolidated Total Assets (Y-9C) (in billions USD)	
DHC Tallk	DHC Name	Commercial Other bank		Foreign	Total	Commercial bank (% of Y-9C Assets)		
1	Jpmorgan Chase & Co.	4	2,936	451	3,391	86.1%	2,265.8	
2	Bank Of America Corporation	5	1,541	473	2,019	77.9%	2,136.6	
3	Citigroup Inc.	2	935	708	1,645	68.8%	1,873.9	
4	Wells Fargo & Company	5	1,270	91	1,366	92.5%	1,313.9	
5	Goldman Sachs Group, Inc., The	1	1,444	1,670	3,115	11.2%	923.7	
6	Metlife, Inc.	1	39	123	163	3.2%	799.6	
7	Morgan Stanley	2	1,593	1,289	2,884	10.5%	749.9	
10	Bank Of New York Mellon Corporation, The	3	211	146	360	83.2%	325.8	
20	Regions Financial Corporation	1	35	4	40	97.1%	127.0	
30	Comerica Incorporated	2	72	2	76	99.8%	61.1	
40	First Horizon National Corporation	1	35	1	37	99.1%	24.8	
50	Webster Financial Corporation	1	21	0	22	99.8%	18.7	
Total		86	13,670	5,847	19,603	70.4%	14,359.1	

Notes: Structure data are as of February 20, 2012. Financial data are as of 2011Q4. The number of subsidiaries of each BHC is determined based on the Regulation Y definition of control. Asset data include approximately 3,700 of the more than 19,600 subsidiaries belonging to the top 50 BHCs that meet particular reporting threshold criteria.

Avraham, Selvaggi and Vickery, EPR issue



Notes: Structure data are as of February 20, 2012, and December 31, 1990, and include the top 50 BHCs at each of these dates.

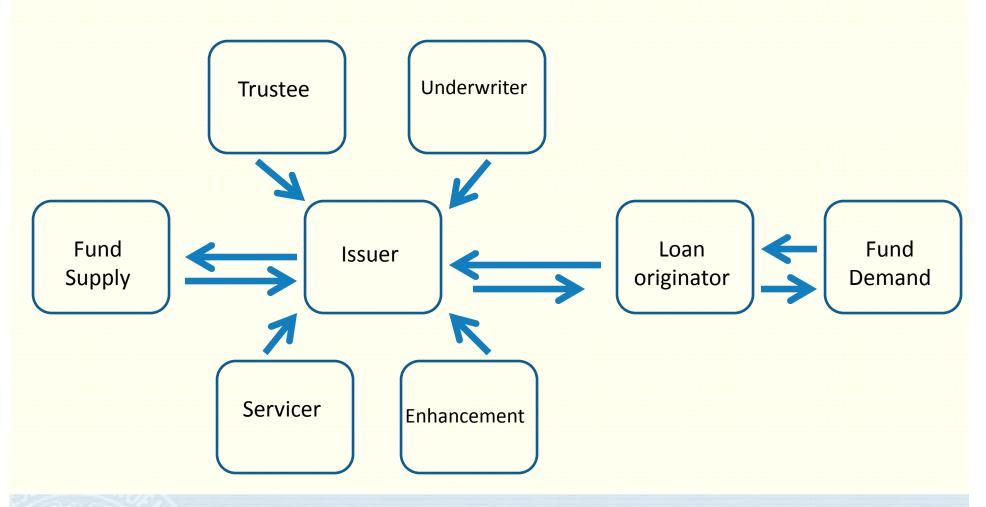
Avraham, Selvaggi and Vickery, EPR issue

Organizational dynamics. Mergers and Acquisition, U.S. Financial Industry, 1982-2012

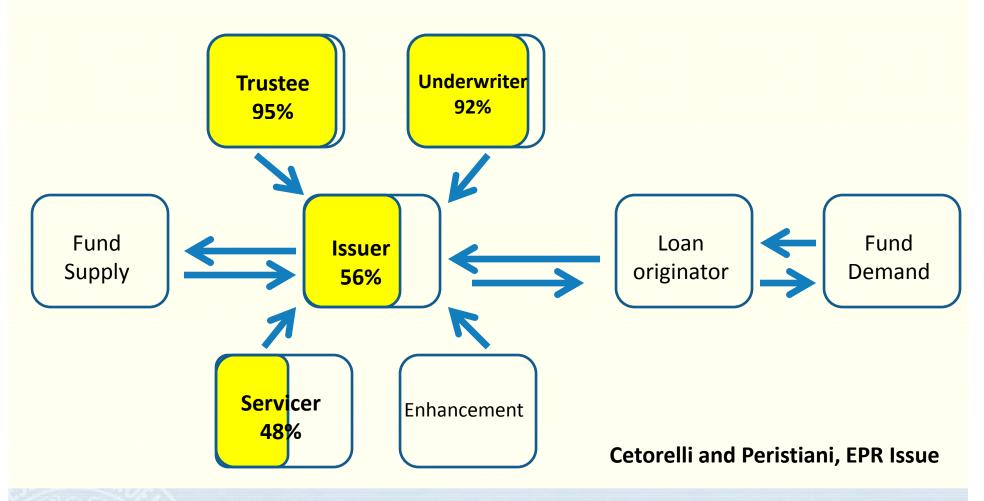
Buyer	Target Asset Manager	Bank	Broker- Dealer		Ins	Ins Under writer	Inv		Specialty Lender	
Asset Manager	401	. 0	23	57	17	14	4	2	50	568
Bank	390	7,802	162	146	744	20	1	2,340	830	12,435
Broker-Dealer	108	8	477	70	57	5	2	6	67	800
Financial Technology	9) 1	17	841	55	5	0	1	22	951
Insurance Broker	30	0	9	31	1,626	23	0	1	4	1,724
Insurance Underwriter	90) 5	30	104	490	1,180	0	10	55	1,964
Investment Company	17	' 1	2	5	4	2	11	1	64	107
Savings Bank/Thrift/M	41	. 581	28	5	141	6	0	1,330	217	2,349
Specialty Lender	6	5 17	15	26	11	5	3	19	937	1,039
	1,092	8,415	763	1,285	3,145	1,260	21	3,710	2,246	21,937

Substantial "off-diagonal" asset acquisition by banks

Back to the map



Dominant role of BHCs along the credit intermediation chain



Summing up

- Modern system of financial intermediation is complex
- Many more entities other than banks involved (rise of "shadow banks")
- Risks moved away from banks' balance sheet
- Huge monitoring and regulatory implications
 - Expand regulatory umbrella outside of banking
 - Expand official "wrap"
 - Curb complexity

Bottom line of NYFED research undertaking:

When looked closely, modern financial intermediation seems less "shadowy" than we thought

Regulated bank entities have kept a considerable footprint in modern financial intermediation.

How do we track *future* evolution?

Current regulatory option: expand perimeter of prudential supervision to what recognized as "in the shadow"

But new regulation may be a source of future shadow banking

Our analysis suggests if new products or activities emerge, there's a very good chance a bank will be part of it.

A tool for effective forward-looking monitoring

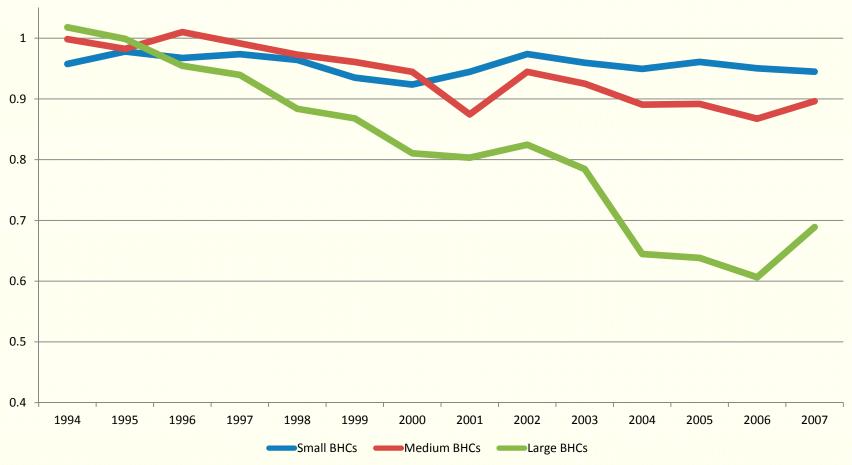
FOLLOW THE BANKS!

The monitoring of banks can still provide an effective window into its continuous evolution, thus allowing for the identification of new risks and the design of prompt regulatory measures.

Stress the role of bank supervisory agencies (focus on whole BHC structure) for effective forward-looking monitoring.

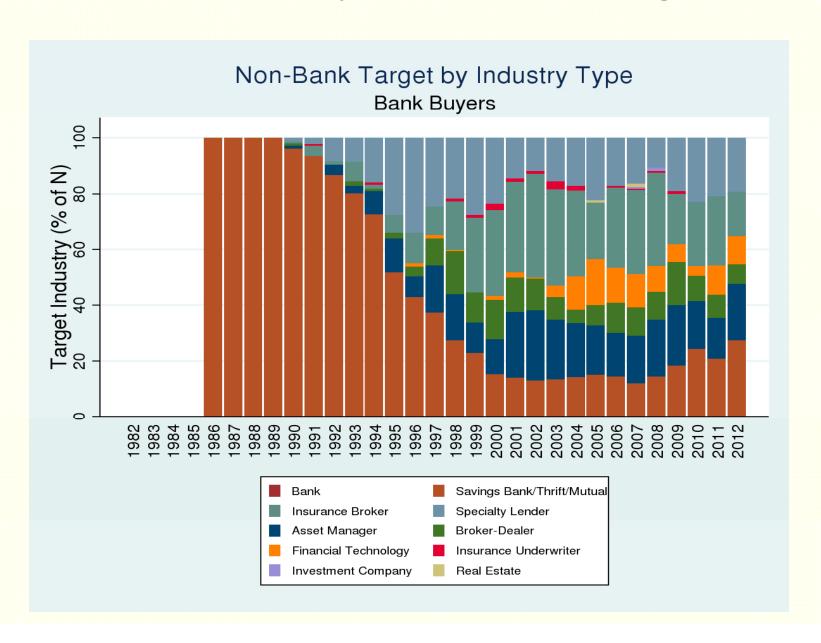
Increasing role of non-bank subsidiaries

Contribution of commercial bank subsidiaries to noninterest income of their BHCs



Copeland, EPR issue

Banks as buyers. Non-bank targets



Current facts on "boundaries" of BHCs

- Bank holding companies in 2011 controlled about 38 percent of the assets of the largest (top twenty) insurance companies,
- Roughly 41 percent of total money market mutual fund assets,
- Approximately 93 percent of the assets of the largest (top thirty) brokers and dealers.
- Very little securities lending and related cash collateral reinvestments take place without the services provided by the main custodian banks.