

## Discussion of: Shopping for Consumer Credit

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The views expressed are those of the presenter and do not necessarily represent those of the Federal Reserve Board or its staff.

## Session on "Consumer Shopping" but...



- Both papers share a common theme of being about instances were more information may be bad
- Ko & Williams: "Mandating disclosure can decrease welfare, whether measured by the total surplus that accrues to all consumers or the welfare of unsophisticated consumers."
- **Bos & Nakamura**: "Credit arrear removal is welfare enhancing."
- Discussion will focus on understanding why



- "The Effects of Regulating Penalty Fees for Consumer Financial Products"
- Paper looks at a LOT of stuff
  - In many cases, mandatory disclosure either has no effect on welfare or increases welfare
- I am going to focus on one narrow case where mandatory disclosure reduces welfare
  - Homogenous valuation model

## What Drives Decline in Welfare?



Informed Informable Uninformed



	Informed	Informable	Uninformed
Voluntary	Pay On Time	Pay late	Pay Late
Disclosure (with shrouding):	-αρ	(1-α)p	(1-α)p



	Informed	Informable	Uninformed
Voluntary Disclosure (with shrouding):	Pay On Time	Pay late	Pay Late
	-αp	(1-α)p	(1-α)p
Mandatory Disclosure (with shrouding):	Pay On Time	Pay On Time	Pay Late
	-α(1-λ)p	-α(1-λ)p	(1-α+αλ)ρ



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	-α(1-λ)p	-α(1-λ)p	(1-α+αλ)p
Welfare Change	Negative	Positive	Negative

Mandatory disclosure....



- Reduces cross subsidization
  - But this does not affect welfare
- Causes "informable" consumers to become informed
  - Realizing the high cost of paying late, they now pay on time
  - The loss in benefit from paying late decreases welfare
- Policy "seems" to work, though it results in a loss of welfare



- In optimal world, everyone would pay late (informed, uninformed, informable)
- Competitive market means any revenue gains from high late fees are passed on to consumers
  - Are these results robust to imperfectly competitive markets?



- "Should Defaults be Forgotten? Evidence from Legally Mandated Removal"
- Exploits an exogenous source of variation on reporting using Swedish data
  - Went from removing at end of calendar year to removal three years after the arrear
- Allows a comparison of results for people with 3 year removal times and people with longer lag times



- Treatment Group: Arrear from January to August 2000
  Arrear removed in October 2003
- Control Group: Arrear from September 2000 to June 2001
  - Arrear removed after three years
- Looks at how removal affects
  - Credit scores
  - Loan applications
  - Acquisition of new credit
  - New arrears after removal



- Only look at people with arrearages
- "Forgetting" credit history, however, will affect everyone
  A proper welfare analysis should look at all individuals
- More fundamental question: What does the removal of this information do to model predictiveness?
  - More accurate models should expand credit availability





- These are both very interesting papers
- Remind us that requiring more disclosure may be harmful and that requiring the retention of less information may improve market outcomes