

Discussion of “Bank market power and credit allocation”

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Plan

- 1 Overview
- 2 What about the demand side?
- 3 Instrumental variables
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1.1 Overview

Bank market power creates distortions

- Financial stability (risks of bank failure, deposit runs)
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- DOJ's 2023 Merger Guidelines (Banking Addendum)
- Dodd–Frank Act (2010) consumer-facing provisions
- Open Banking / Data Access CFPB §1033 rule (2024)

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- } Supply
- } Demand

Regulations target different sources of bank power

- How does each source affect commercial lending?

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- ① Decomposes the sources of market power: supply, demand, and risk
- ② Examines the effects of supply-side on credit allocation, firm growth, and aggregate welfare

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Follow-up of [Brugués and De Simone, 2024 \(R&R JPE, congrats!\)](#)

- Ecuador's banking structure reflects limited competition
 - ▶ Incomplete pass-through of a loan tax reform in Ecuador, consistent with a joint-maximization behavior of banks
 - ▶ Changes in prices, marginal costs, and markups of moving to competition

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Main results:

- Changes in loan use, and the welfare of moving to competition
 - ▶ Heterogeneous effects by firm size and age
- Positive effect of more loan use on firm productivity
- Positive effects of moving to competition on aggregate efficiency

2. What about the demand side?

- ① How large are the distortions from the demand-side?
 - ▶ Demand side accounts for 70% of markups (market power)
 - ▶ Understanding demand-side may be more relevant than supply-side

	Panel C: Markups	
Markup - Not Accounting for Conduct	2.43	2.30
Markup - Accounting for Conduct	6.38	4.79
Markup - Move to Bertrand-Nash	4.56	2.43
% Share of Markup due to Conduct	25.46	19.18
% Share of Markup due to Preferences	70.27	72.62
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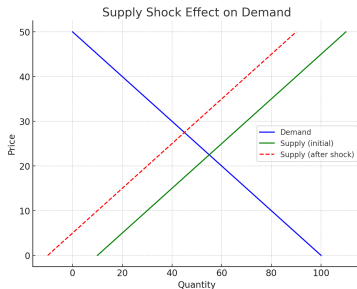
- ▶ Firms face limited outside options, switching costs, and info frictions
- ▶ Bank market power can moderate the welfare losses caused by asymmetric information (Crawford et al. 2018)

3.1 Instrumental Variable

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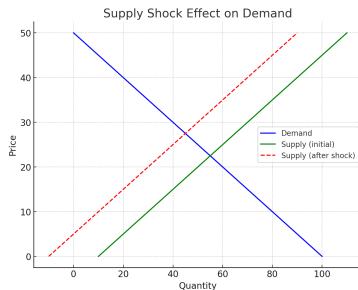
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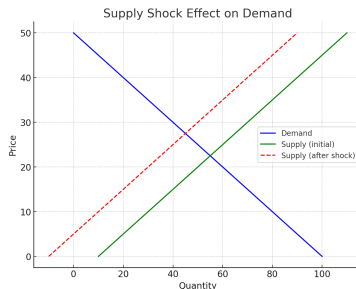
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- **Identification:** Instruments should capture bank-level marginal cost variation that is orthogonal to individual demand
- **Proposed instruments:** Average prices of matched banks in other provinces
 - ▶ Commercial credit, mortgages, micro-lending
 - ▶ Delinquencies in non-commercial credit products

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• Suggestions

- ▶ Placebo test: use non-matched banks in other provinces
- ▶ Young's test for IV ([Young, 2022](#))
- ▶ Report information about compliers (relevant for external validity)

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Control function approach: Residuals of the FS are included in the SS

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- In CF, if $\text{cov}(x, e) \neq 0$, $\hat{u}$ controls for endogeneity
- 2SLS not valid if instruments do not satisfy the exclusion restriction
- If the exclusion restriction holds, why not just use IV?
 - ▶ α should be interpreted in terms of $\hat{x}$ instead of x
 - ▶ It loses "natural" interpretation

5.1 Additional comments

① Two-step causality:

$$\begin{aligned}r &= \rho Z + u \\ \ln(\textit{credit}) &= \alpha r + e \\ TFP &= \beta \ln(\textit{credit}) + v\end{aligned}\tag{4}$$

- ▶ Need not only $\text{cov}(\hat{r}, e) = 0$, but also $\text{cov}(\ln(\hat{\textit{credit}}), v) = 0$
- ▶ $Z \perp e$ and $Z \perp v$

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Overall: Interesting paper, natural extension of B&DS, 2024

Best of Luck with the Next Draft!