

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM



Report to the Congress on the Profitability of Credit Card Operations of Depository Institutions

Submitted to the Congress pursuant to section 8 of the Fair Credit and Charge Card Disclosure Act of 1988

June 2015

Section 8 of the Fair Credit and Charge Card Disclosure Act of 1988 directs the Federal Reserve Board to transmit annually to the Congress a report about the profitability of credit card operations of depository institutions.¹ This is the twenty-fifth report. The analysis here is based to a great extent on information from the Consolidated Reports of Condition and Income (Call Report) and the Quarterly Report of Credit Card Interest Rates.²

Call Report Data

Every insured commercial bank files a Call Report each quarter with its federal supervisory agency. The Call Report provides a comprehensive balance sheet and income statement for each bank; however, it does not allocate all expenses or attribute all revenues to specific product lines, such as credit cards. Nevertheless, the data may be used to assess the profitability of credit card activities by analyzing the earnings of those banks established primarily to issue and service credit card accounts. These specialized or mono-lined banks are referred to here as "credit card banks."

For purposes of this report, credit card banks are defined by two criteria: (1) the bulk of their assets are loans to individuals (consumer lending), and (2) 90 percent or more of their consumer lending involves credit cards or related plans. Given this definition, it can reasonably be assumed that the profitability of these banks primarily reflects returns from their credit card operations.³

The first credit card banks were chartered in the early 1980s; few were in operation prior to the mid-1980s. To provide a more reliable picture of the year-to-year changes in the profitability of the credit card operations of card issuers, this report limits its focus to credit card banks having at least \$200 million in assets. Most of these institutions have been in continuous operation for several years, particularly those with assets exceeding \$1 billion, and are well beyond the initial phase of their operations.

As of December 31, 2014, 14 banks with assets exceeding \$200 million met the definition of a credit card bank. At that time, these banks accounted for about 47 percent of outstanding credit card balances on the books of commercial banks. One major credit card

¹ Refer to P.L. 100-583, 102 Stat. 2960 (1988). The 2000 report covering 1999 data was not prepared as a consequence of the Federal Reports Elimination and Sunset Act. The report was subsequently reinstated by law.

² The Federal Reserve produces the *Quarterly Report of Credit Card Interest Rates*.

³ Two banks (Discover and American Express) were included that did not quite meet these criteria, but can still be considered credit card banks.

lender, FIA Card Services, merged with Bank of America in 2014 and no longer separately reports Call Report data.⁴

Tracking credit card profitability over time is complicated. Accounting rule changes implemented in 2010 require banking institutions to consolidate onto their Call Reports some previously off-balance sheet items (such as credit card-backed securities). To the extent that previously off-balance sheet assets have a different rate of return than on-balance sheet assets, profitability measures based on Call Report data in 2010 and after are not necessarily comparable to those prior to 2010.

Another difficulty that arises in assessing changes in the profitability of credit card activities over time is that the sample of credit card banks changes somewhat from one year to the next primarily because of mergers and acquisitions. Thus, overall changes in profit rates from year to year reflect both real changes in activity and changes in the sample.

Table 1. Return on assets, large U.S. credit card banks, 2001-2014

Year	Return (%)
2001	4.83
2002	6.06
2003	6.73
2004	6.30
2005	4.40
2006	7.65
2007	5.08
2008	2.60
2009	-5.33
2010	2.41
2011	5.37
2012	4.80
2013	5.20
2014	4.94

NOTE: Credit card banks are commercial banks with average assets greater than or equal to 200 million dollars with minimum 50 percent of assets in consumer lending and 90 percent of consumer lending in the form of revolving credit. Profitability of credit card banks is measured as net pre-tax income as a percentage of average quarterly assets.
SOURCE: Reports of Condition and Income, 2001-2013.

In 2014, credit card banks with assets in excess of \$200 million reported net earnings before taxes and extraordinary items of 4.94 percent of average quarterly assets (Table 1). The level of earnings in 2014 is down slightly from 2013. The data for 2013 included earnings of

⁴ FIA Card Services was a subsidiary of the Bank of America Corporation, a bank holding company, as is Bank of America.

FIA Card Services, whereas the data for 2014 does not due to their merger with Bank of America. Excluding FIA Card Services data from 2013 suggests that credit card profitability declined more significantly from 2013 to 2014, from 5.57 percent to 4.94 percent.

The decline in profitability in 2014 reflects declining net interest and net non-interest income, as well as a slight increase in provisions for loans losses as a fraction of average assets (Table 2). Although provisions among the set of credit card banks rose slightly, delinquency rates and charge-off rates for credit card loans across all banks continued to decline in 2014, and are below their historic averages.⁵

Table 2. Income and expenses for U.S. banks in 2013 and 2014

	Credit card banks in 2014	Credit card banks in 2013	All commercial banks in 2014
	Percent of average quarterly assets		
Total Interest Income	9.63	9.94	2.48
Total Interest Expenses	0.75	0.83	0.27
Net Interest Income	8.88	9.11	2.21
Total Non-Interest Income	4.93	5.49	1.46
Total Non-Interest Expenses	6.52	6.89	2.30
Net Non-Interest Income	-1.59	-1.40	-0.84
Provisions for Loan Losses	2.35	2.14	0.16
Return	4.94	5.57	1.23

NOTE: Credit card banks are commercial banks with average assets greater than or equal to 200 million dollars with minimum 50 percent of assets in consumer lending and 90 percent of consumer lending in the form of revolving credit. For 2013, FIA Card Services is excluded from credit card banks.

SOURCE: Reports of Condition and Income, 2001-2013.

Although profitability for the large credit card banks has risen and fallen over the years, credit card earnings have been almost always higher than returns on all commercial bank activities.⁶ Earnings patterns for 2014 were consistent with historical experience: For all

⁵ Refer to *Federal Reserve Statistical Release*, “Charge-Off and Delinquency Rates on Loans and Leases at Commercial Banks,” www.federalreserve.gov/releases/chargeoff/delallsa.htm.

⁶ This report focuses on the profitability of large credit card banks, although many other banks engage in credit card lending without specializing in this activity. The profitability of the credit card activities of these other banks is difficult to discern. The cost structures, pricing behavior and cardholder profiles, and consequently the profitability of these diversified institutions may differ from that of the large, specialized card issuers considered in this report.

In preparing many of the older annual reports on credit card profitability, information from the Federal Reserve’s Functional Cost Analysis (FCA) Program was used to measure the profitability of the credit card activities of smaller credit card issuers. These data tended to show credit card activities were less profitable for smaller issuers than for larger ones. The FCA program was discontinued in the year 2000. For further discussion, see Glenn B. Canner and Charles A. Luckett, Developments in the Pricing of Credit Card Services, *Federal Reserve Bulletin*, vol. 78, no. 9 (September 1992), pp. 652-666.

commercial banks, the average return on all assets, before taxes and extraordinary items was 1.23 percent in 2014 compared to 4.94 percent for the large credit card banks (Table 2).

General Discussion

Bank cards are widely held by consumers and they use their cards extensively. According to the Federal Reserve's Survey of Consumer Finances (SCF) about 70 percent of families had one or more credit cards in 2013. Consumers use credit cards for purposes of borrowing, as standby line of credit for unforeseen expenses and as a convenient payment device. As a source of credit, credit card loans have substituted for borrowing that in years past might have taken place using other loan products, such as closed-end installment loans and personal lines of credit. As a convenient payment device, a portion of the outstanding balances reflects primarily "convenience use", that is, balances consumers intend to repay within the standard interest-rate grace period offered by card issuers. In fact, consumer surveys, such as the SCF, typically find that about half of card holders report they nearly always repay their outstanding balance in full before incurring interest each month.⁷

The general purpose bank credit card market in the U.S. is dominated by VISA- and MasterCard-labeled cards that combined accounted for an estimated 472 million cards in 2014.⁸ In addition, American Express and Discover accounted for another 107 million general purpose cards in 2014. The combined total number of charges and cash advances using such cards in 2014 reached 28.2 billion, involving almost \$2.7 trillion dollars in 2014.

Although a relatively small group of card issuers hold most of the outstanding credit card balances, several thousand banking institutions and credit unions offer bank cards to consumers and are free to set their terms and conditions.⁹ In the aggregate, the Federal Reserve's *G.19 Consumer Credit* report indicates that consumers carried nearly \$890 billion in outstanding balances on their revolving accounts as of the end of 2014, about 3.7 percent higher than the

⁷ The numbers from the SCF are little changed since 2010; for a discussion of credit borrowing in 2010, refer to Jesse Bricker, Arthur B. Kennickell, Kevin B. Moore, and John Sabelhaus, (2012) "Changes in U.S. Family Finances from 2007 to 2010: Evidence from the Survey of Consumer Finances." *Federal Reserve Bulletin*.

⁸ Figures cited in this sentence and the remainder of the paragraph is from *The Nilson Report*, February 2015.

⁹ Currently, over 5,000 depository institutions including commercial banks, credit unions and savings institutions, issue VISA and MasterCard credit cards and independently set the terms and conditions on their plans. Many thousands of other institutions act as agents for card-issuing institutions. In addition to the firms issuing cards through the VISA and MasterCard networks, two other large firms, American Express Co. and Discover Financial Services, issue independent general purpose credit cards to the public.

level in 2013.¹⁰ Although expanding some from 2013, this figure is notably lower now than its high point of \$1.01 trillion in 2008.

Based on credit record data the amount of available credit under outstanding credit card lines far exceeds the aggregate of balances owed on such accounts. Credit record data indicate that as of the end of 2014 individuals were using less than one-quarter of the total dollar amount available on their lines under revolving credit card plans.¹¹ The total dollar amount available has risen somewhat since 2010, but is still about 20 percent below its peak in 2008.

In soliciting new accounts and managing existing account relationships, issuers segment their cardholder bases along a number of dimensions including by risk characteristics, offering more attractive rates to customers who have good payment records while imposing relatively high rates on higher-risk or late-paying cardholders. Card issuers also closely monitor payment behavior, charge volume and account profitability and adjust credit limits accordingly both to allow increased borrowing capacity as warranted and to limit credit risk.

Direct mail solicitations continue to be an important channel used for new account acquisition and account retention. After reaching an all-time high in 2006 of 7.0 billion direct mail solicitations, mailings fell sharply as the recent recession emerged. Mail solicitations fell to only 1.5 billion in 2009.¹² Industry data indicate that the retrenchment in mailings began to reverse starting in the third quarter of 2009 as prospects for economic recovery improved. Industry data on mail solicitation activity indicate mailings rebounded to 4.2 billion in 2011. The number of solicitations has been smaller since then, reaching 3.5 billion in 2014.

Recent Trends in Credit Card Pricing

Aside from questions about the profitability of credit card operations, credit card pricing and how it has changed in recent years has been a focus of public attention and is consequently reviewed in this Report. Analysis of the trends in credit card pricing here focuses on credit card interest rates because they are the most important component of the pricing of credit card services. Credit card pricing, however, involves other elements, including annual fees, fees for cash advances and balance transfers, rebates, minimum finance charges, over-the-limit fees, and late payment charges.¹³ In addition, the length of the "interest-free" grace period, if any, can

¹⁰ Refer to www.federalreserve.gov/releases/g19/Current. Revolving credit consists largely of credit card balances but also includes some other types of open-end debt such as personal lines of credit.

¹¹ Refer to the *Quarterly Report on Household Debt and Credit*, available at www.newyorkfed.org/index.html.

¹² Source: Data from Mintel Comperemedia. Refer to www.comperemedia.com.

¹³ In June 1996, the Supreme Court ruled that states may not regulate the fees charged by out-of-state credit card issuers. States

have an important influence on the amount of interest consumers pay when they use credit cards to generate revolving credit.

Over time, pricing practices in the credit card market have changed. Today card issuers offer a broad range of plans with differing rates depending on credit risk and consumer usage patterns. Risk-based pricing has become a central element of most credit card plan pricing regimes and the economic downturn and new credit card rules spurred changes in pricing in 2009 and 2010. In most plans, an issuer establishes a rate of interest for customers of a given risk profile; if the consumer borrows and pays within the terms of the plan, that rate applies. If the borrower fails to meet the plan requirements, for example, the borrower pays late or goes over their credit limit, the issuer may reprice the account reflecting the higher credit risk revealed by the new behavior. Regulations that became effective in February 2010 limit the ability of card issuers to reprice outstanding balances for cardholders that have not fallen at least 60 days behind on the payments on their accounts. Issuers may, however, reprice outstanding balances if they were extended under a variable-rate plan and the underlying index used to establish the rate of interest (such as the prime rate) changes. The new rules continue to provide issuers with considerable pricing flexibility regarding new balances.

This report relies on credit card pricing information obtained from the *Quarterly Report of Credit Card Interest Rates* (FR 2835a). This survey collects information from a sample of credit card issuers on (1) the average nominal interest rate and (2) the average computed interest rate. The former is the simple average interest rate posted across all accounts; the latter is the average interest rate paid by those cardholders that incur finance charges. These two measures can differ because some cardholders are convenience users who pay off their balances during the interest-free grace period and therefore do not typically incur finance charges. Together, these two interest rate series provide a measure of credit card pricing. The data are made available to the public each quarter in the Federal Reserve Statistical Release *G.19 Consumer Credit*.

Data from the FR 2835a indicate that the average credit card interest rate across all accounts is currently at a relatively low level around 12 percent, while the two-year Treasury rate, a measure of the short-term baseline or “risk-free” rate, has been close to zero since mid-

have not been permitted to regulate the interest rates out-of-state banks charge. In making its decision, the Court supported the position previously adopted by the Comptroller of the Currency that a wide variety of bank charges, such as late fees, membership fees, and over-the-limit fees, are to be considered interest payments for this purpose. This ruling will likely ensure that banks will continue to price credit cards in multidimensional ways rather than pricing exclusively through interest rates. Source: Valerie Block, Supreme Court Upholds Nationwide Card Charges, *American Banker*, June 4, 1996.

An assessment of the fees charged by credit card issuers is provided in “Credit Cards: Increased complexity in Rates and Fees Heightens Need for More Effective Disclosures to Consumers,” U.S. Government Accountability Office, Report 06-929, September 12, 2006. Refer to www.gao.gov.

2011. (Figure 1). Average rates on accounts assessed interest are reported to be somewhat higher, at closer to 14 percent as of 2014:q4. It is important to note that while average rates paid by consumers have moved in a relatively narrow band over the past several years, interest rates charged vary considerably across credit card plans and borrowers reflecting the various features of the plans and the risk profile of the card holders served.

