

James Vickery (Federal Reserve Bank of Philadelphia)

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Overview and general reactions

- Broad question: Which mechanisms drive bank lending channel of monetary policy? E.g.,:
 - Overall bank net worth? (a la Holmstrom-Tirole 1997 etc.)
 - Bank regulatory capital?
 - Deposit supply? (Drechsler et al. 2017)
 - Value of pledgeable securities used as collateral for interbank borrowing? [this paper]
- Also: "insurance" role of internal bank capital markets to mitigate liquidity crunch
- Overall: Great paper!
 - Significant contribution to growing literature on role of securities in MP transmission

Comments

1. Measuring collateral constraints

2. Role of regulatory capital constraints

3. Empirical specification

1. Measuring collateral constraints

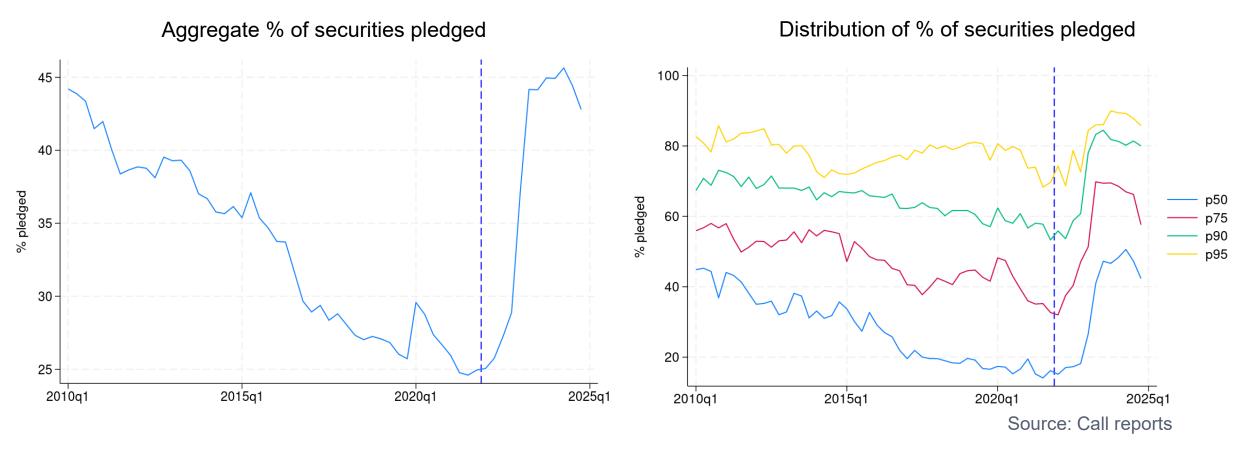
• Conceptually: collateral utilization =
$$\frac{\text{secured borrowing}}{\underbrace{\sum_{i}(1-\text{haircut}_{i})\text{ mkt val securities}_{i}}_{\text{borrowing capacity}}}$$

<u>Puzzle</u>: Collateral utilization measure in paper often > 100% (even w/o haircut adjustment):

Suggestions:

- 1. Refine measure? E.g., exclude unsecured borrowing; secured by loans etc. Haircut data?
- Then: present facts about how collateral constraints evolved over this period
 - Did collateral utilization increase? How many banks are close to full utilization?
 - Did utilization increase more for banks with high sec. losses?

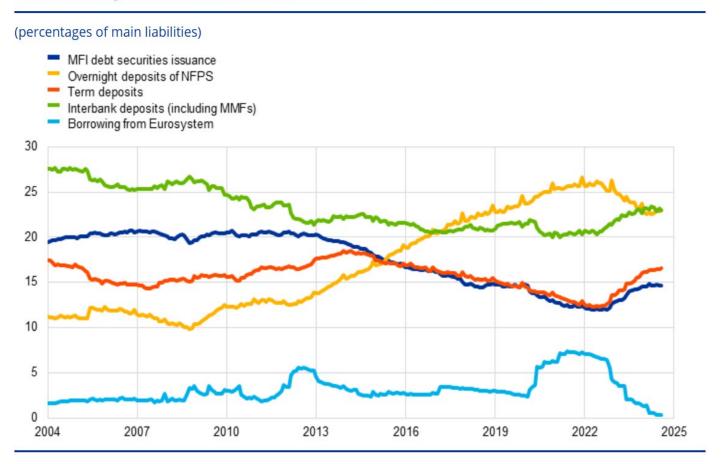
US evidence: how did collateral utilization change as MP tightened?



- Collateral utilization up sharply post-2022, but particularly driven by Mar 2023 turmoil + BTFP
- Most banks have plenty of spare collateral, but a subset seem fairly constrained

Role of TLTRO exit in amplifying tighter collateral constraints in EU?

Bank liability structure over time



- Large drop in Eurosystem borrowing from 2022-24 due to expiration of TLTRO III
 - Magnitude: ~6% of assets (context: securities losses 0.6% of assets)
- 2. Offset by a mix of (i) interbank borrowing; (ii) bond issuance; (iii) term deposits

Sources: ECB (balance sheet items (BSI) statistics) and ECB calculations.

Suggestions

- Show (in cross-section of banks) that securities losses were key driver of higher collateral utilization post-tightening ("first stage")
- Seems like expiration of TLTRO III should be a bigger part of the paper
 - Do TLTRO expiration, securities losses work *together* to tighten collateral constraints
 - Make sure main estimates strip out fx of TLTRO expiration (e.g., control for ECB x time)
- How exactly does *intra-group* lending overcome collateral constraint?
 - Is the intragroup lending unsecured?
 - Is it secured but with lower haircuts?

2. Monetary transmission through securities portfolio: Europe v US

Paper finds no evidence that securities losses have more "bite" if they flow through to regulatory capital:

	Loan Amount			
	(4)	(5)	(6)	_
Collateral HTM Security $Losses_{b,t-1}$	-7.120*** (0.838)		-6.489*** (0.872)	← Losses <u>not</u> in capital
Collateral AFS Security $Losses_{b,t-1}$		-5.727*** (1.069)	-3.868*** (1.048)	

- 2. Stark contrast to US evidence: Greenwald et al. 2024 essentially finds securities losses only transmit to lending if they affect regulatory capital
 - Findings also differ from Orame, Ramcharam and Robatto (2025) [Italian data]
- How to interpret? E.g., do US banks just have much smaller reg. cap buffers?

3. Empirical specification

Loan Amount_{b,g,f,t} =
$$\alpha + \beta$$
 Security Losses_{b,t} + $\gamma X_{b,t} + \delta_{f,t} + \mu_{g,t} + \theta_{b,f} + \epsilon_{b,g,f,t}$

- Augment with graphical evidence to show overall trends; visualize dynamics of lending
 - Raw plots of lending volume over time, after sorting banks by e.g., terciles of losses?
 - Replace β securities losses_{b,t} with β_t high losses_b and plot time path of β_t
 - Confirm no evidence of differential pre-trends prior to monetary tightening
- 2. Log model has poor statistical properties, esp. if outcome variable often zero [Chen & Roth QJE 2024; Cohn et al. RFS 2022; Santos Silva & Tenreyro REStat 2006]
 - Literature has proposed various alternatives (e.g., poisson is more robust, and packages available to handle HDFE)

Summing up

- 1. Very nice paper. Studies important dimension of the bank lending channel. Rich data. New evidence on how lending by affiliates can mitigate liquidity constraints.
- 2. Scope to "flesh out the details" many of my comments reflect that
- 3. Look forward to seeing future versions!