

# Competition and Incentives in Mortgage Markets: The Role of Brokers

**Claudia Robles-Garcia**

Stanford GSB

Federal Trade Commission Microeconomics Conference  
November 14-15, 2019

Charts and estimates use data provided by the UK Financial Conduct Authority.

# Motivation

- ▶ Many transactions are made via intermediaries acting as expert advisors (e.g., financial products sold through dealers and brokers).

# Motivation

- ▶ Many transactions are made via intermediaries acting as expert advisors (e.g., financial products sold through dealers and brokers).
- ▶ **Remuneration** of these intermediaries can affect their incentives and recommendations to consumers.
  - Policy debate on how to regulate compensation of experts

# Motivation

- ▶ Many transactions are made via intermediaries acting as expert advisors (e.g., financial products sold through dealers and brokers).
- ▶ **Remuneration** of these intermediaries can affect their incentives and recommendations to consumers.
  - Policy debate on how to regulate compensation of experts
- ▶ **Mortgage Markets and Mortgage Brokers:**
  - Brokers act as intermediaries between households and lenders
  - Popular choice among future homeowners
    - Brokers originate 50% of residential mortgages in the UK (FCA, 2018)
    - 33% in the US (CFPB, 2017), 53% in Australia (MFAA, 2018) and 55% in Canada (CMHC, 2018)

# The Role of Mortgage Brokers

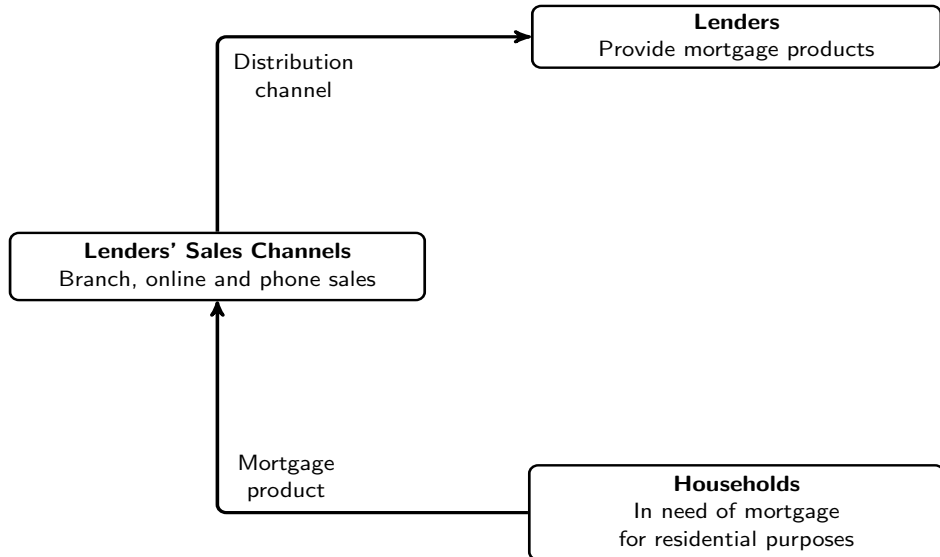
## **Lenders**

Provide mortgage products

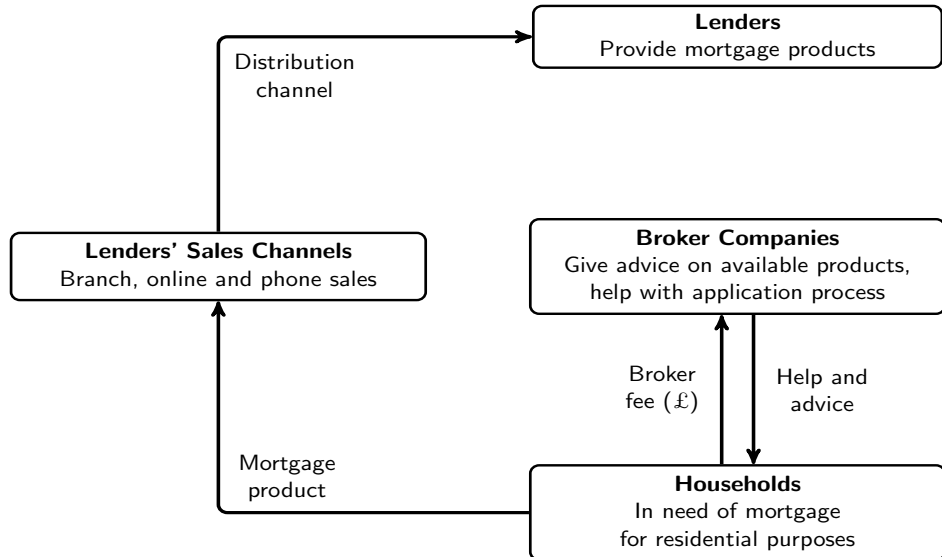
## **Households**

In need of mortgage  
for residential purposes

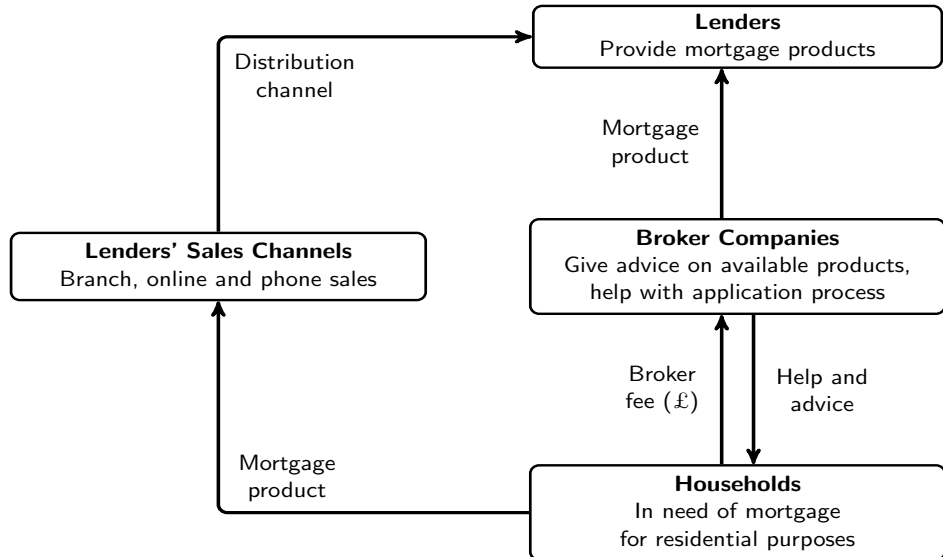
# The Role of Mortgage Brokers



# The Role of Mortgage Brokers

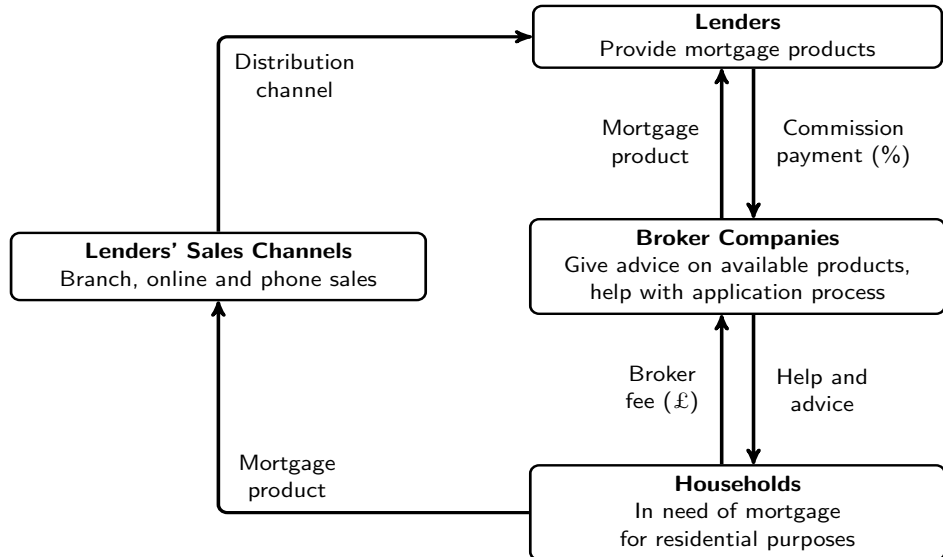


# The Role of Mortgage Brokers





# The Role of Mortgage Brokers



# Trade-offs of Having Mortgage Brokers

(–) Potential **agency problem** between households and brokers

- ▶ Commissions can distort brokers' advice to households
- ▶ E.g., if products with higher commissions are more expensive

# Trade-offs of Having Mortgage Brokers

(−) Potential **agency problem** between households and brokers

- ▶ Commissions can distort brokers' advice to households
- ▶ E.g., if products with higher commissions are more expensive

(+) Brokers may increase **efficiency and upstream competition**

- ▶ Brokers can lower search costs for consumers and marginal costs for lenders
- ▶ Brokers may allow new, smaller lenders to introduce their products in the market

# Trade-offs of Having Mortgage Brokers

## (−) Potential **agency problem** between households and brokers

- ▶ Commissions can distort brokers' advice to households
- ▶ E.g., if products with higher commissions are more expensive

## (+) Brokers may increase **efficiency and upstream competition**

- ▶ Brokers can lower search costs for consumers and marginal costs for lenders
- ▶ Brokers may allow new, smaller lenders to introduce their products in the market

## (?) Recent **regulations** restricting commission payments

- ▶ US, Netherlands, Australia...
- ▶ Reduce the agency problem, but can have unintended consequences for upstream competition and efficiency

# This Paper

## ► **Loan-level Data**

- Universe of mortgage originations in UK (>2M obs)
- Broker commissions and fees for each loan

# This Paper

- ▶ **Loan-level Data**

- Universe of mortgage originations in UK (>2M obs)
- Broker commissions and fees for each loan

- ▶ **Structural Equilibrium Model**

- Supply and demand model capturing key trade-offs

# This Paper

- ▶ **Loan-level Data**

- Universe of mortgage originations in UK (>2M obs)
- Broker commissions and fees for each loan

- ▶ **Structural Equilibrium Model**

- Supply and demand model capturing key trade-offs

- ▶ **Research Questions:**

1. Do brokers react to commission payments? Is there an agency problem?

# This Paper

- ▶ **Loan-level Data**

- Universe of mortgage originations in UK (>2M obs)
- Broker commissions and fees for each loan

- ▶ **Structural Equilibrium Model**

- Supply and demand model capturing key trade-offs

- ▶ **Research Questions:**

1. Do brokers react to commission payments? Is there an agency problem?
2. Do brokers improve upstream competition and/or efficiency?



# This Paper

- ▶ **Loan-level Data**

- Universe of mortgage originations in UK (>2M obs)
- Broker commissions and fees for each loan

- ▶ **Structural Equilibrium Model**

- Supply and demand model capturing key trade-offs

- ▶ **Research Questions:**

1. Do brokers react to commission payments? Is there an agency problem?
2. Do brokers improve upstream competition and/or efficiency?
3. What are the effects of regulations restricting broker compensation?

# Related Literature

## 1. Expert Advisors

- ▶ Ho and Pakes (2014), Egan, Matvos and Seru (2018), Egan (2017), Guiso, Pozzi, Tsoy, Gambacorta and Mistrulli (2018)
- ▶ **Restriction on Upstream Payments.** Theory: Inderst and Ottaviani (2009, 2012), Martimort and Pouyet (2017). Empirical: Grennan, Myers, Swanson and Chatterji (2018).  
→ Structural model with new micro data, and broker-lender remuneration variation

## 2. Consumer choice in mortgage markets

- ▶ Campbell and Cocco (2003), Campbell (2012), Agarwal et al (2014), Best et al. (2015), De Fusco and Paciorek (2016), Benetton (2018), Hall and Woodward (2012)  
→ Mortgage brokers and supply side responses to demand side

## 3. Empirical Bargaining

- ▶ Crawford and Yurukoglu (2012), Grennan (2013), Gowrisankaran, Nevo and Town (2015), Ho and Lee (2017, 2018), Crawford, Lee and Yurukoglu (2018)  
→ Financial markets, consumers can bypass intermediaries and directly access providers, new identification strategy.

# DATA AND UK MORTGAGE MARKET

# Data

- ▶ **Main dataset (FCA):** New loan-level dataset on the universe of prime residential mortgages originated in the UK in 2015Q1-2016Q2 (>2 million loans).
  - ▶ Mortgage characteristics ▶ Stats
    - Observed: interest, loan amount, lender, fees, rate type.
    - Unobserved: rejections, advertising, marginal costs,...
  - ▶ Borrower characteristics ▶ Stats
    - Observed: income, age, credit score, house value, postcode.
    - Unobserved: education, wealth, risk-aversion,...
  - ▶ Broker characteristics (if intermediated) ▶ Stats
    - Observed: fees, commissions, broker company.
    - Unobserved: individual brokers, advertising,...
- ▶ **Additional sources:**
  - ▶ Broker-lender contract agreements (FCA).
  - ▶ Branch network at the postcode level over time for all lenders (Experian's Goad and Shop\*Point)

# Specific to the UK Mortgage Market

## ► Limited individual-based pricing

- Lender, maximum loan-to-value band and initial fixed period explain 94% of variation in interest rates

► Explained Variation

► Interest Rate Jumps

⇒ Brokers do not get better deals for the same product

# Specific to the UK Mortgage Market

## ► Limited individual-based pricing

- Lender, maximum loan-to-value band and initial fixed period explain 94% of variation in interest rates

► Explained Variation

► Interest Rate Jumps

⇒ Brokers do not get better deals for the same product

## ► Very concentrated lender market

- “The Big Six” account for more than 75% of originations

► Consolidation Timeline

⇒ Recent entry in the market by “challenger banks”

► Entry Timeline

# Specific to the UK Mortgage Market

## ► Limited individual-based pricing

- Lender, maximum loan-to-value band and initial fixed period explain 94% of variation in interest rates

► Explained Variation

► Interest Rate Jumps

⇒ Brokers do not get better deals for the same product

## ► Very concentrated lender market

- “The Big Six” account for more than 75% of originations

► Consolidation Timeline

⇒ Recent entry in the market by “challenger banks”

► Entry Timeline

## ► Also concentrated broker market

- Largest 20 broker companies >65% of brokered sales
- CR4s for broker sales are on average 83% at the county level

► Map

# UK Mortgage Brokers

	All Borrowers	First-Time Buyers	Home Movers	Internal Remortgagors	External Remortgagors
<b>Broker-Originated</b>	46%	72%	64%	11%	63%

- ▶ Households pay brokers a fee of £140, on average.
- ▶ Brokers get, on average, a commission of £720 from lenders (a rate of 0.41% of the loan)
  - Commission rates vary across broker-lender pairs.
  - Heterogeneity in broker-lender networks.

▶ [Commission Stats](#)



# Motivating Evidence: What does the data tell us?

- ▶ Descriptive evidence suggests there is a trade-off.

## (−) Agency Problem?

⇒ Higher commission, higher broker sales (cross-sectional and time-series).

## (+) Upstream Competition?

⇒ Borrowers using brokers more likely to originate their mortgage with new, small banks.

⇒ In counties where brokers enter, concentration ratios go down.

- ▶ Develop a model to quantify this trade-off and simulate possible regulation.

# MODEL

# Ingredients of the Model

- ▶ Static equilibrium model.
- ▶ Three types of agents:
  - Households
  - Lenders
  - Brokers
- ▶ Face sequential decisions

# Ingredients of the Model

- ▶ Static equilibrium model.
- ▶ Three types of agents:
  - Households
  - Lenders
  - Brokers
- ▶ Face sequential decisions
  1. (Supply) Brokers and lenders bilaterally bargain over lenders' inclusion in brokers' network.
    - If agreement, a per-sale commission is set.

# Ingredients of the Model

- ▶ Static equilibrium model.
- ▶ Three types of agents:
  - Households
  - Lenders
  - Brokers
- ▶ Face sequential decisions
  1. (Supply) Brokers and lenders bilaterally bargain over lenders' inclusion in brokers' network.
    - If agreement, a per-sale commission is set.
  2. (Supply) Lenders set interest rates to max expected profits.

# Ingredients of the Model

- ▶ Static equilibrium model.
- ▶ Three types of agents:
  - Households
  - Lenders
  - Brokers
- ▶ Face sequential decisions
  1. (Supply) Brokers and lenders bilaterally bargain over lenders' inclusion in brokers' network.
    - If agreement, a per-sale commission is set.
  2. (Supply) Lenders set interest rates to max expected profits.
  3. (Demand) Households choose a sales channel.
    - Intermediated or direct.

# Ingredients of the Model

- ▶ Static equilibrium model.
- ▶ Three types of agents:
  - Households
  - Lenders
  - Brokers
- ▶ Face sequential decisions
  1. (Supply) Brokers and lenders bilaterally bargain over lenders' inclusion in brokers' network.
    - If agreement, a per-sale commission is set.
  2. (Supply) Lenders set interest rates to max expected profits.
  3. (Demand) Households choose a sales channel.
    - Intermediated or direct.
  4. (Demand) Households choose a mortgage product.

## Demand for Broker Services

- ▶ Household  $i$  observes its search cost,  $\kappa_i$ 
  - $\Rightarrow$  fixed cost associated with originating a mortgage
  - $\Rightarrow$  heterogeneous and i.i.d. draws from a distribution  $F_{\kappa}^I$
- ▶ **Direct channel**  $\Rightarrow$  household incurs search cost  $\kappa_i$
- ▶ **Broker channel**  $\Rightarrow$  household gets matched to broker  $b$  with probability  $\pi_{b(i)}$  and pays a fee of  $f_{b(i)}$
- ▶ A household is indifferent if:

$$\underbrace{E_{\epsilon}[\max V_i(D)|C_{iD}] - \hat{\kappa}_i}_{\text{Payoffs Direct Channel}} = \underbrace{\sum_{b=1}^B \pi_{b(i)} * \left( E_{\epsilon}[\max V_i(b)|C_{ib}] - \alpha_i f_{b(i)} \right)}_{\text{Payoffs Broker Channel}}$$



# Demand for Mortgage Products

## ► Direct Sales:

$$V_{ijlm}^D = \alpha_i r_{jlm} + X_{jl}' \beta_i + \xi_{jlm} + \lambda \text{Branches}_{ilm} + \varepsilon_{ijlm}$$

where:

- $X_{jl}$  are observed product characteristics, and  $r_{jlm}$  are interest rates.
- $\xi_{jlm}$  unobserved product characteristics, and  $\varepsilon_{ijlm}$  taste shock iid across mortgages and borrowers.

# Demand for Mortgage Products

## ► Direct Sales:

$$V_{ijlm}^D = \alpha_i r_{jlm} + X'_{jl} \beta_i + \xi_{jlm} + \lambda \text{Branches}_{ilm} + \varepsilon_{ijlm}$$

## ► Broker Sales:

$$V_{b(i)jlm} = (1 - \theta_b) \left( \overbrace{\alpha_i r_{jlm} + X'_{jl} \beta_i + \xi_{jlm} + \epsilon_{ijlm}}^{\text{Household Utility } (V_{ijlm}^b)} \right) \\ + \theta_b \left( \overbrace{\delta c_{blm} + X'_{jl} \gamma + \zeta_{blm}}^{\text{Broker Utility } (W_{bjm})} \right)$$

where:

- $X_{jl}$  are observed product characteristics, and  $r_{jlm}$  are interest rates.
- $\xi_{jlm}$  unobserved product characteristics, and  $\varepsilon_{ijlm}$  taste shock iid across mortgages and borrowers.
- $\zeta_{blm}$  are broker-lender unobserved characteristics.

# Lender Pricing

Lender's profits from direct sale:

$$\Pi_{ijm}^{l,D} = t_j (r_{jm} - mc_{jm}^D)$$

Lender's profits from broker sale:

$$\Pi_{ijm}^{l,b} = t_j (r_{jm} - mc_{jm}^b) - c_{lbm}$$

Expected profits:

$$\begin{aligned} \Pi_{im}^l &= F_{\kappa}(\hat{\kappa}_{im}) * \underbrace{\sum_{j \in J_l} (s_{ijlm} * \Pi_{ijm}^{l,D})}_{\text{Revenue from Direct Sales}} \\ &+ \underbrace{\left[1 - F_{\kappa}(\hat{\kappa}_{im})\right] * \sum_{j \in J_l} \sum_{b=1}^B (\pi_{b(i)m} * s_{b(i)jlm} * \Pi_{ijm}^{l,b})}_{\text{Revenue from Broker Sales}} \end{aligned}$$

## Lender-Broker Bargaining

- ▶ Every period, broker-lender pairs meet.
- ▶ They bargain á la Nash whether to form an agreement.
- ▶ If successful, then they set a commission (% of loan).
- ▶ If not successful, then commission is set to zero and broker cannot sell lender's products.
- ▶ All negotiations are simultaneous and separate.
  - ▶ Commissions set in other meetings,  $c_{-lb}$ , are not known but conjectured.

## Lender-Broker Bargaining (cont.)

- ▶ In each bilateral meeting,  $c_{lb}$  maximizes bilateral Nash product:

$$NP^{lb}(c_{lb}|\mathbf{c}_{-lb}) = [GFT_L(b)]^{\beta_{lb}} [GFT_B(l)]^{1-\beta_{lb}}$$

$$s.t. \quad GFT_L(b) \geq 0 \quad (PC \text{ lender})$$

$$GFT_B(l) \geq 0 \quad (PC \text{ broker})$$

- ▶  $GFT_L(b)$  and  $GFT_B(l)$  are lender and broker gains from trade (agreement minus disagreement payoffs).
- ▶  $\beta_{lb}$  is the bargaining power of lender  $l$  when negotiating with broker  $b$ .

## Lender-Broker Bargaining (cont.)

- ▶ In each bilateral meeting,  $c_{lb}$  maximizes bilateral Nash product:

$$NP^{lb}(c_{lb}|\mathbf{c}_{-lb}) = [GFT_L(b)]^{\beta_{lb}} [GFT_B(l)]^{1-\beta_{lb}}$$

$$\begin{aligned} s.t. \quad GFT_L(b) &\geq 0 && (PC \text{ lender}) \quad \Rightarrow \bar{c} \\ GFT_B(l) &\geq 0 && (PC \text{ broker}) \end{aligned}$$

- ▶  $GFT_L(b)$  and  $GFT_B(l)$  are lender and broker gains from trade (agreement minus disagreement payoffs).
- ▶  $\beta_{lb}$  is the bargaining power of lender  $l$  when negotiating with broker  $b$ .

## Lender-Broker Bargaining (cont.)

- ▶ In each bilateral meeting,  $c_{lb}$  maximizes bilateral Nash product:

$$NP^{lb}(c_{lb}|\mathbf{c}_{-lb}) = [GFT_L(b)]^{\beta_{lb}} [GFT_B(l)]^{1-\beta_{lb}}$$

$$s.t. \quad GFT_L(b) \geq 0 \quad (PC \text{ lender}) \Rightarrow \bar{c}$$

$$GFT_B(l) \geq 0 \quad (PC \text{ broker}) \Rightarrow \underline{c}$$

- ▶  $GFT_L(b)$  and  $GFT_B(l)$  are lender and broker gains from trade (agreement minus disagreement payoffs).
- ▶  $\beta_{lb}$  is the bargaining power of lender  $l$  when negotiating with broker  $b$ .

# ESTIMATION AND IDENTIFICATION



## **Four Types of Unobserved Parameters:**

## Four Types of Unobserved Parameters:

1. Preferences parameters (households and brokers)
  - Logit + IVs for interest rates and commissions

## Four Types of Unobserved Parameters:

1. Preferences parameters (households and brokers)
  - Logit + IVs for interest rates and commissions
2. Search costs
  - Mean and variance across consumer groups
  - Assume normal distribution

## Four Types of Unobserved Parameters:

1. Preferences parameters (households and brokers)
  - Logit + IVs for interest rates and commissions
2. Search costs
  - Mean and variance across consumer groups
  - Assume normal distribution
3. Marginal costs
  - Separately for direct and broker sales
  - FOCs + Broker/Direct Shares

## Four Types of Unobserved Parameters:

1. Preferences parameters (households and brokers)
  - Logit + IVs for interest rates and commissions
2. Search costs
  - Mean and variance across consumer groups
  - Assume normal distribution
3. Marginal costs
  - Separately for direct and broker sales
  - FOCs + Broker/Direct Shares
4. Bargaining parameters
  - Branch networks
  - Commission and link variation

## ESTIMATION RESULTS

# Demand Estimates

---

---

## PARAMETERS

---

	Interest Rate ( $\alpha$ )	High LTV ( $\psi$ )	Branches ( $\lambda$ )	Distortion Broker ( $\bar{\theta}$ )	High LTV Broker ( $\bar{\gamma}_{21}$ )	2-Year Fixed Broker ( $\bar{\gamma}_{22}$ )
Estimate	-0.91	0.45	0.33	0.37	0.14	0.27
SE	0.39	0.10	0.09	0.11	0.02	0.08

---

---

▸ In-Sample Fit

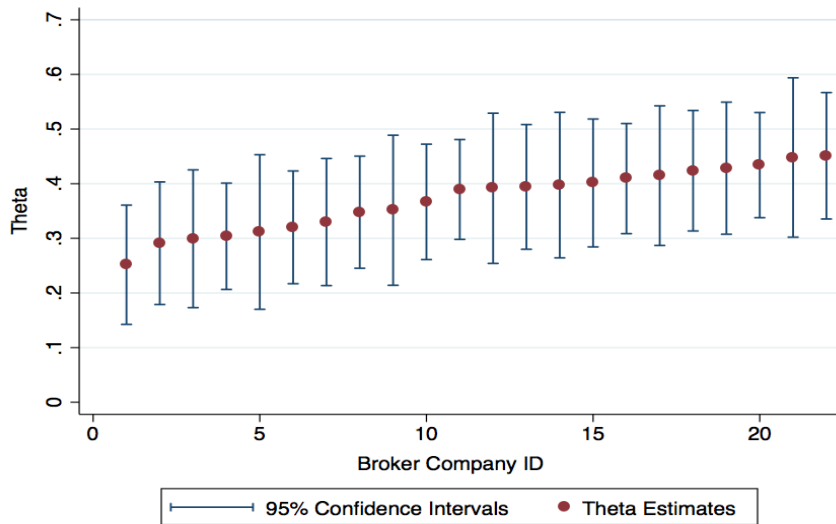
▸ Out-of-Sample Fit

▸ Lender Fit

▸ Period Fit

▸ LTV Fit

## Broker Distortion $\theta_b$ : No Benevolent Brokers





# Estimates Results

- ▶ Search costs account for 20% of consumer surplus.

▶ Search Costs

- ▶ Marginal costs are 7% lower for broker sales.

▶ Marginal Costs

- ▶ Mark-ups are 35% lower for broker sales.

▶ Mark-Ups

- ▶ It is 46% more costly for brokers to originate mortgages with challenger banks.

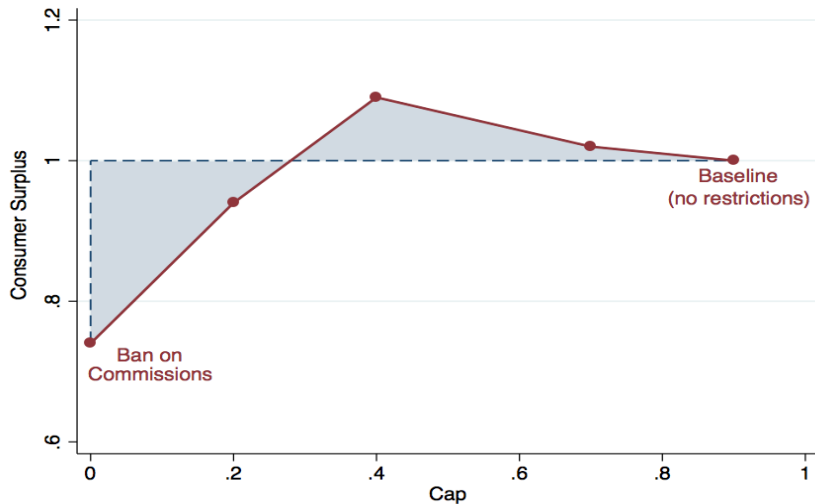
▶ Broker-Lender FE

- ▶ Bargaining parameters reject take-it-or-leave-it offers.

▶ Bargaining Parameters

COUNTERFACTUAL:  
REGULATING BROKER COMPENSATION

# Restricting Commissions



► Mechanism

► Table Results

► Broker Fees  $\Delta$

► Homogeneous Commission

## Mechanism: Ban on Commissions

► [Go back](#)

A ban on commission payments:

→ Reduces agency problem (+)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

**No trade-off for lenders when choosing brokers:**

- Lenders always want to form link with brokers (+)  
(distribution channel with lowest marginal cost)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

**No trade-off for lenders when choosing brokers:**

- Lenders always want to form link with brokers (+)  
(distribution channel with lowest marginal cost)

**Trade-off for brokers when including challenger banks:**

- Challengers offer on average cheaper products (+)
- But, they are more costly to originate (−)



## Mechanism: Ban on Commissions

► [Go back](#)

What effects dominate?

## Mechanism: Ban on Commissions [▶ Go back](#)

What effects dominate?

1. Brokers reduce their agreements with challengers by 72%.  
→ Decreases lender competition in the intermediary channel (—)

What effects dominate?

1. Brokers reduce their agreements with challengers by 72%.
  - Decreases lender competition in the intermediary channel (—)
2. Higher prices dominate gains for 44% of households previously going to brokers.
  - They shift to lenders' direct sales channels.
  - Increases households' search costs (—)
  - Increases lenders' average marginal costs (—)
  - Decreases lender competition in the direct channel (—)

What effects dominate?

1. Brokers reduce their agreements with challengers by 72%.
  - Decreases lender competition in the intermediary channel (—)
2. Higher prices dominate gains for 44% of households previously going to brokers.
  - They shift to lenders' direct sales channels.
  - Increases households' search costs (—)
  - Increases lenders' average marginal costs (—)
  - Decreases lender competition in the direct channel (—)
3. Interest rates increase by 11% (—)

## CONCLUSIONS

## Conclusion and Policy Implications

- ▶ A ban on commissions can be detrimental for consumers in markets where:
  - Search costs are high.
  - Consumers can bypass intermediaries and access the good directly from providers.
  - Providers have market power in the direct channel.
  - Consumers can discipline brokers, e.g. reputation concerns, repeated sales.
- ▶ Important to account for supply-side reactions to regulation.

# EXTRA SLIDES

## Counterfactual: No Brokers

	Ban on Brokerage
<b>Market Structure</b>	
HHI (% $\Delta$ )	35%
Share Big Six (% $\Delta$ )	19%
<b>Pass-Through</b>	
Prices (% $\Delta$ )	24%
Marginal Cost (% $\Delta$ )	13%
Lender Profits (% $\Delta$ )	12%
<b>Demand</b>	
Share Direct (% $\Delta$ )	357%
Search Costs (% $\Delta$ )	156%
Consumer Surplus % $\Delta$	-51%



## Counterfactual: Mandatory Brokers

	Broker Mandatory
<b>Market Structure</b>	
HHI (% $\Delta$ )	-27%
Share Big Six (% $\Delta$ )	-17%
<b>Pass-Through</b>	
Prices (% $\Delta$ )	9%
Marginal Cost (% $\Delta$ )	-12%
Lender Profits (% $\Delta$ )	-20%
Commission Rates (% $\Delta$ )	42%
<b>Demand</b>	
Share Direct (% $\Delta$ )	-100%
Search Costs (% $\Delta$ )	-100%
Consumer Surplus (% $\Delta$ )	-6%

## Mechanism: Ban on Commissions

[▶ Go back](#)

A ban on commission payments:

→ Reduces agency problem (+)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

**No trade-off for lenders when choosing brokers:**

- Lenders always want to form link with brokers (+)  
(distribution channel with lowest marginal cost)

## Mechanism: Ban on Commissions [▶ Go back](#)

A ban on commission payments:

- Reduces agency problem (+)
- Price of broker services goes up for households. (+/-)

**Trade-off for households when choosing brokers:**

- Higher price for broker services (−)
- Chance of a better mortgage allocation (+)

**No trade-off for lenders when choosing brokers:**

- Lenders always want to form link with brokers (+)  
(distribution channel with lowest marginal cost)

**Trade-off for brokers when including challenger banks:**

- Challengers offer on average cheaper products (+)
- But, they are more costly to originate (−)

## Mechanism: Ban on Commissions

► [Go back](#)

What effects dominate?

## Mechanism: Ban on Commissions [▶ Go back](#)

What effects dominate?

1. Brokers reduce their agreements with challengers by 72%.  
→ Decreases lender competition in the intermediary channel (—)



What effects dominate?

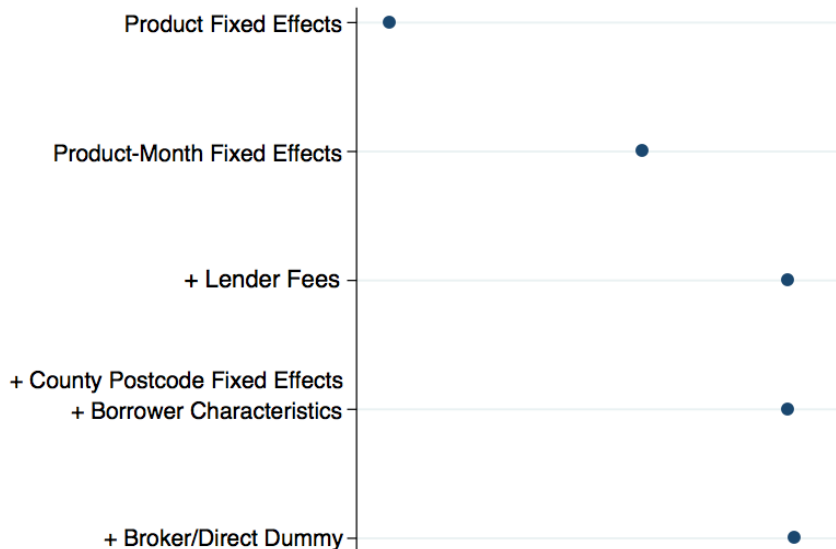
1. Brokers reduce their agreements with challengers by 72%.
  - Decreases lender competition in the intermediary channel (—)
2. Higher prices dominate gains for 44% of households previously going to brokers.
  - They shift to lenders' direct sales channels.
  - Increases households' search costs (—)
  - Increases lenders' average marginal costs (—)
  - Decreases lender competition in the direct channel (—)

What effects dominate?

1. Brokers reduce their agreements with challengers by 72%.
  - Decreases lender competition in the intermediary channel (—)
2. Higher prices dominate gains for 44% of households previously going to brokers.
  - They shift to lenders' direct sales channels.
  - Increases households' search costs (—)
  - Increases lenders' average marginal costs (—)
  - Decreases lender competition in the direct channel (—)
3. Interest rates increase by 11% (—)

# Explained Variation of Mortgage Rates [▶ Go back](#)

- ▶ Regressions of borrower-level interest rates on sets of dummies



## Interest Jumps at Loan-To-Value

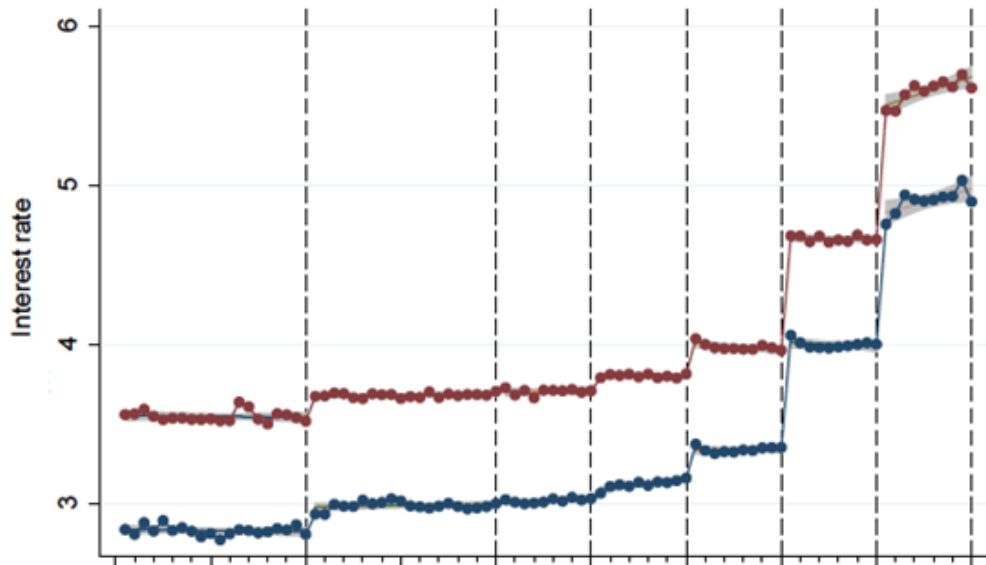
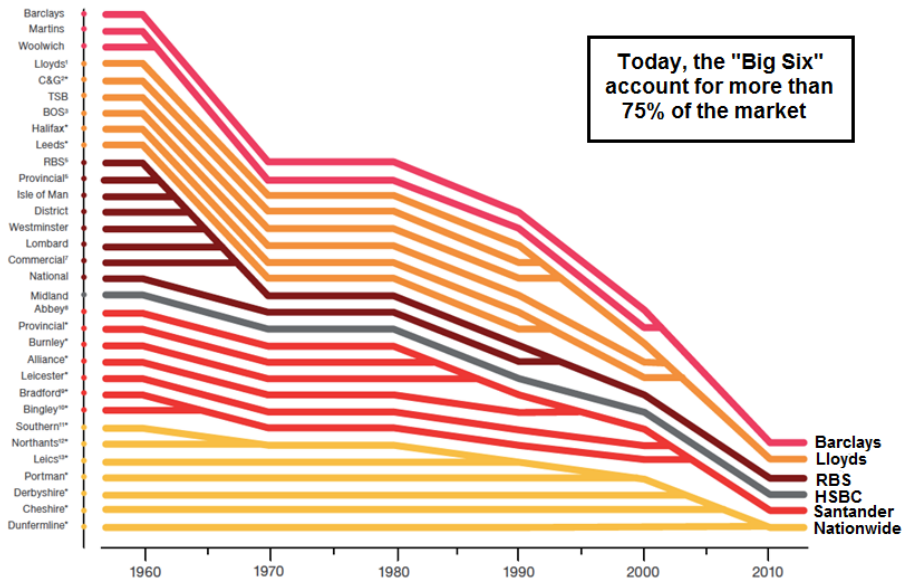
[▶ Go back 1](#)[▶ Go back 2](#)

FIGURE A.1: REMORTGAGES HAPPEN WHEN THE RESET RATE KICKS IN



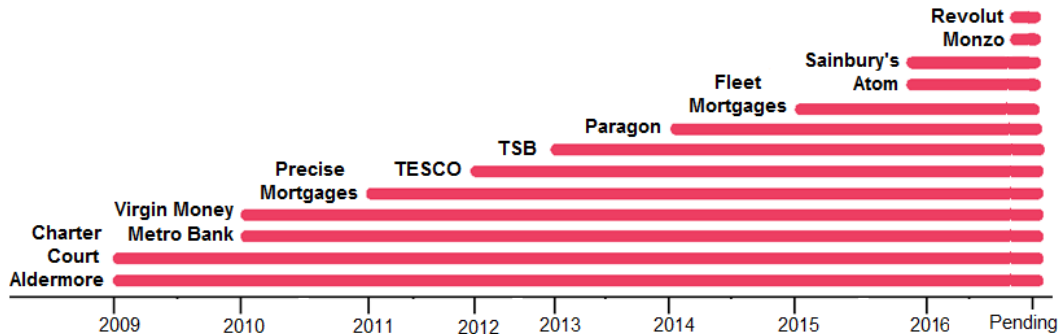
Source: Best, Cloyne, Ilzetzki and Kleven (2015)

# Consolidation of Major UK lenders (1960-2016) [▶ Go back](#)



## Entrants Mortgage Market [Go back](#)

(2009-present, non-exhaustive)



	N	Mean	SD	Min	Max
<b>Panel A: Loan Characteristics</b>					
Interest Rate (%)	2,236,025	2.57	0.79	1.26	6.2
Lender Fee (£)	2,236,025	467	631	0	2405
Loan Value (£1000)	2,236,025	159	129	49	903
Loan-to-Value (%)	2,236,025	60	23	15	98
Maturity (Years)	2,236,025	25	8	2	45
Initial Period (Years)	2,236,025	3.22	2.4	1	10
<b>Panel B: Borrower Characteristics</b>					
First-Time-Buyers	2,236,025	0.19	0.39	0	1
Home-Movers	2,236,025	0.23	0.42	0	1
Internal Remortgagors	2,236,025	0.22	0.41	0	1
External Remortgagors	2,236,025	0.36	0.48	0	1
Gross Income (£1000)	1,506,724	62.13	48.2	10	523
Age (Years)	1,506,724	38	9.6	18	85
Loan-to-Income	1,506,724	3.12	1.2	1.3	5.2
Credit Score	984,471	482	66.3	250	765



## Agreements between largest lenders and broker companies

	Mean	SD	Min	Max
Number of Brokers per Lender	13	7	0	23
Number of Lenders per Broker	8	3	3	14

## Changes in agreements between 2015Q1-2016Q2

Lender-Broker Links Broken	11%
Lender-Broker Links Formed	18%

## (2a) Do brokers react to changes in commissions? [▶ Go Back](#)

$$\mathbf{Share}_{bjltc} = \alpha + \gamma \mathbf{Commission}_{bjltc} + \epsilon_{bjltc}$$

- $\mathbf{Share}_{bjltc}$  : share product  $j$  from lender  $l$  has in broker  $b$ 's sales portfolio in period  $t$  in county  $c$
- $\mathbf{Commission}_{bjltc}$  : per-sale commission (% of loan) broker  $b$  receives from lender  $l$  in period  $t$  in county  $c$

## (2a) Do brokers react to changes in commissions? [▶ Go Back](#)

$$\mathbf{Share}_{bjltc} = \alpha + \gamma \mathbf{Commission}_{bjltc} + \delta_{jltc} + \epsilon_{bjltc}$$

- $\mathbf{Share}_{bjltc}$  : share product  $j$  from lender  $l$  has in broker  $b$ 's sales portfolio in period  $t$  in county  $c$
- $\mathbf{Commission}_{bjltc}$  : per-sale commission (% of loan) broker  $b$  receives from lender  $l$  in period  $t$  in county  $c$
- $\delta_{jltc}$ : product-lender-time-county fixed effects

## (2a) Do brokers react to changes in commissions? [▶ Go Back](#)

$$\mathbf{Share}_{bjlct} = \alpha + \gamma \mathbf{Commission}_{bjlct} + \delta_{jlct} + \mu_{btc} + \epsilon_{bjlct}$$

- $\mathbf{Share}_{bjlct}$  : share product  $j$  from lender  $l$  has in broker  $b$ 's sales portfolio in period  $t$  in county  $c$
- $\mathbf{Commission}_{bjlct}$  : per-sale commission (% of loan) broker  $b$  receives from lender  $l$  in period  $t$  in county  $c$
- $\delta_{jlct}$ : product-lender-time-county fixed effects
- $\mu_{btc}$ : broker-time-county fixed effects

## (2a) Do brokers react to changes in commissions? [▶ Go Back](#)

$$\textit{Share}_{bjlct} = \alpha + \gamma \textit{Commission}_{bjlct} + \delta_{jltc} + \mu_{btc} + \psi_{blc} + \epsilon_{bjlct}$$

- $\textit{Share}_{bjlct}$  : share product  $j$  from lender  $l$  has in broker  $b$ 's sales portfolio in period  $t$  in county  $c$
- $\textit{Commission}_{bjlct}$  : per-sale commission (% of loan) broker  $b$  receives from lender  $l$  in period  $t$  in county  $c$
- $\delta_{jltc}$ : product-lender-time-county fixed effects
- $\mu_{btc}$ : broker-time-county fixed effects
- $\psi_{blc}$  : broker-lender-county fixed effects

## (2a) Do brokers react to changes in commissions? [▶ Go Back](#)

$$\mathbf{Share}_{bjltc} = \alpha + \gamma \mathbf{Commission}_{bjltc} + \delta_{jltc} + \mu_{btc} + \psi_{blc} + \epsilon_{bjltc}$$

- $\mathbf{Share}_{bjltc}$  : share product  $j$  from lender  $l$  has in broker  $b$ 's sales portfolio in period  $t$  in county  $c$
- $\mathbf{Commission}_{bjltc}$  : per-sale commission (% of loan) broker  $b$  receives from lender  $l$  in period  $t$  in county  $c$
- $\delta_{jltc}$ : product-lender-time-county fixed effects
- $\mu_{btc}$ : broker-time-county fixed effects
- $\psi_{blc}$  : broker-lender-county fixed effects

⇒ Products with 13% (£100) higher commissions for a broker are associated with a 2% higher share in broker sales portfolio [▶ FE Regressions](#)

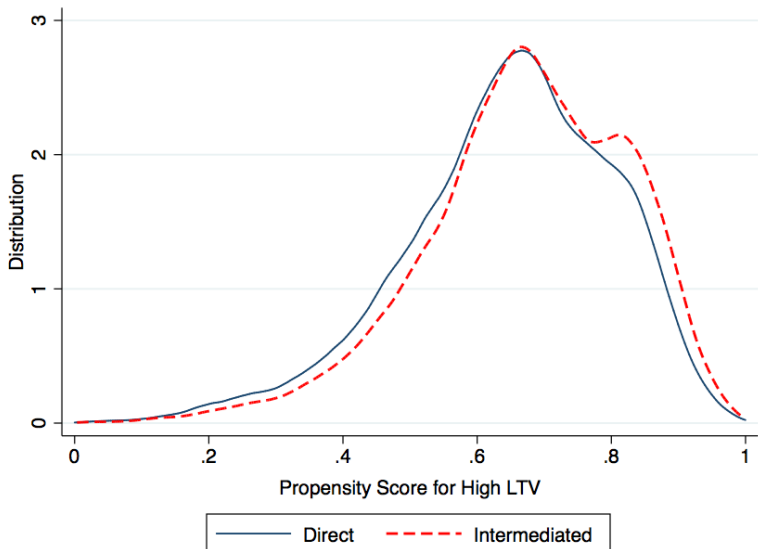
## County-level Regressions [▶ Go Back](#)

Dependent Variable: Product Market Share in Broker Sales (%)	All Borrowers (1)	Only FTBs (2)
Commission Rate (% loan)	0.163 (0.097)	0.271 (0.180)
Product-Time-County FE	Yes	Yes
Broker-Time-County FE	Yes	Yes
Broker-Lender-County FE	Yes	Yes
Observations	327,750	153,416
Adjusted R-squared	0.953	0.937

Standard errors clustered at the broker and county level.

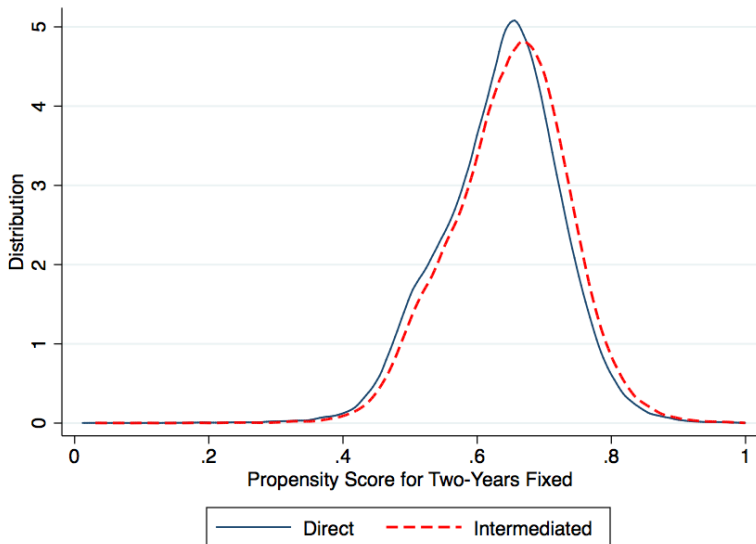
⇒ A product with a 13% increase in commission (£100) has a 2% higher share on broker's portfolio, on average.

## Propensity to choose high LTV products [▶ Go Back](#)





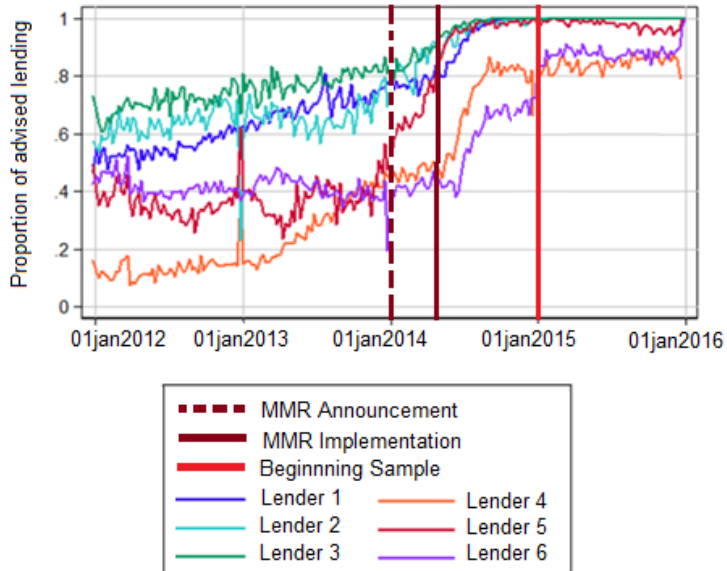
## Propensity to choose shorter initial periods

[▶ Go Back](#)

## Probability of Choosing a Challenger [▶ Go back](#)

Dependent Variable: Challenger (0/1)	All Borrowers (exc. Internal Remortgagors) (1)	First-Time-Buyers Only (2)
Intermediated (0/1)	0.048*** (0.001)	0.067*** (0.003)
Borrower Characteristics	Yes	Yes
Product Characteristics	Yes	Yes
Lender FE	Yes	Yes
County FE	Yes	Yes
Year-Month FE	Yes	Yes
Observations	489,352	159,486
R-squared	0.54	0.63

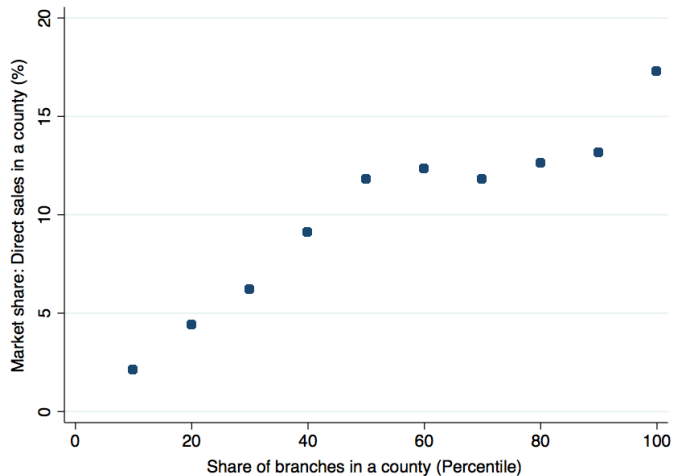
## Direct Channel: % Advised Sales [▶ Go back](#)



- ▶ **Characteristics approach**, given the large number of products (18K in 2015)
  - Product defined by lender, initial fixed period and maximum loan-to-value band.
- ▶ **Household-specific choice set**, based on matching on household characteristics and lenders' affordability criteria
  - ▶ Build household groups based on observable demographics (borrower type, income, age, region and quarter)
  - ▶ Counterfactual choice set: products purchased by households in the same group
  - ▶ Additional within-group restrictions:
    - ▶ Loan-to-income  $<$  max. loan-to-income for given product
    - ▶ Credit score  $>$  min. credit score for given product
- ▶ **Broker-specific choice set**, restricted to lenders with whom the broker has an agreement.

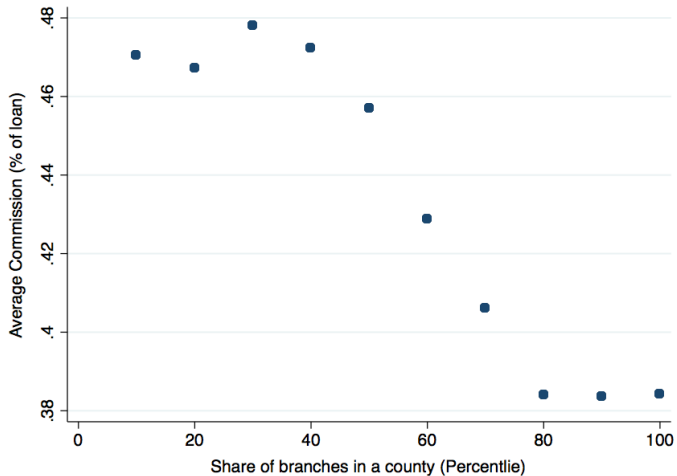
## Branches Matter for Direct Sales

[▶ Go Back](#)

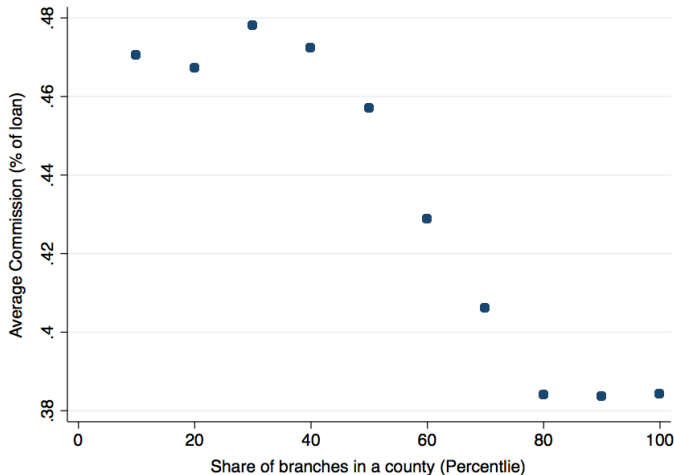


⇒ Even stronger after regulatory change in 2014. [▶ Advice Requirements](#)

## Branches Compete with Brokers



# Branches Compete with Brokers



⇒ **Model:**

- Lenders face different marginal costs for intermediated sales.
- Lender-broker relationship is both vertical and horizontal.

## Identification Bargaining Parameters [▶ Go back](#)

Identification of outside options exploits that lenders and broker have both a vertical and a horizontal relationship.

- ▶ Branches compete with brokers → Affect outside option [▶ Intuition](#)

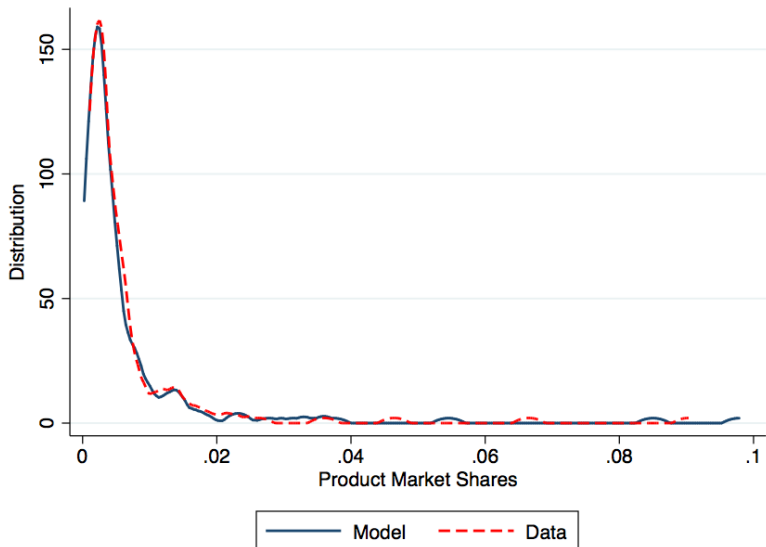
I exploit variation of bank branches across lenders over time.

- **Cross-sectional:** geographical variation of branch density across lenders [▶ UK Map](#)
- **Time Series:**  $\sim 17\%$  branches closed during my sample.
  - ▶ Heterogeneous across lenders and regions [▶ Total Branches](#)

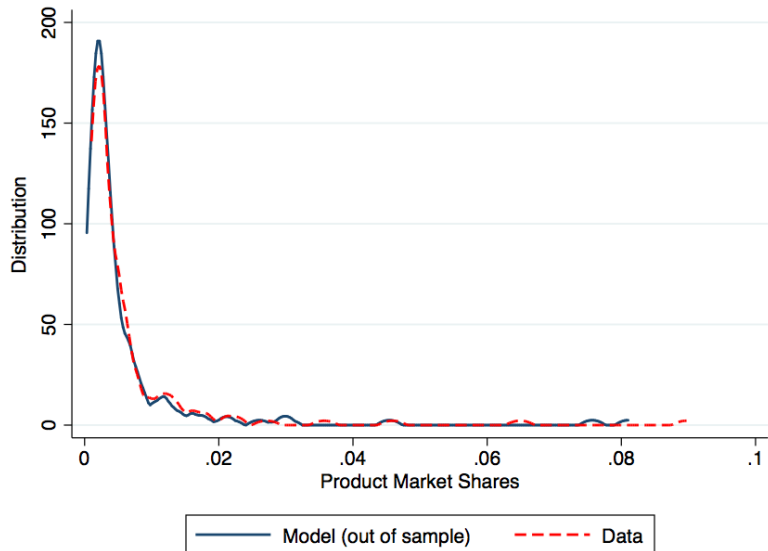
I also exploit that renegotiations of commissions (yearly) are less frequent than demand realizations in outside options (quarterly)



## In-Sample Model Fit [▶ Go back](#)



## Out-of-Sample Model Fit [▶ Go back](#)

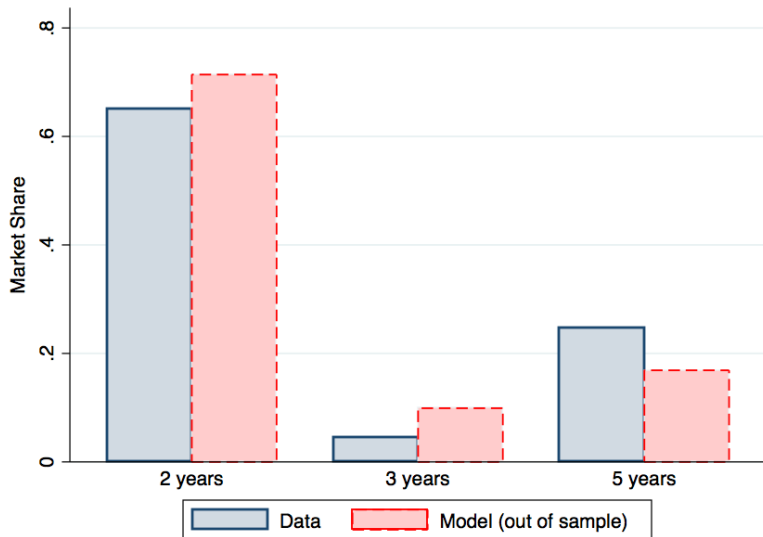


## Lender Market Shares Fit

[Go back](#)

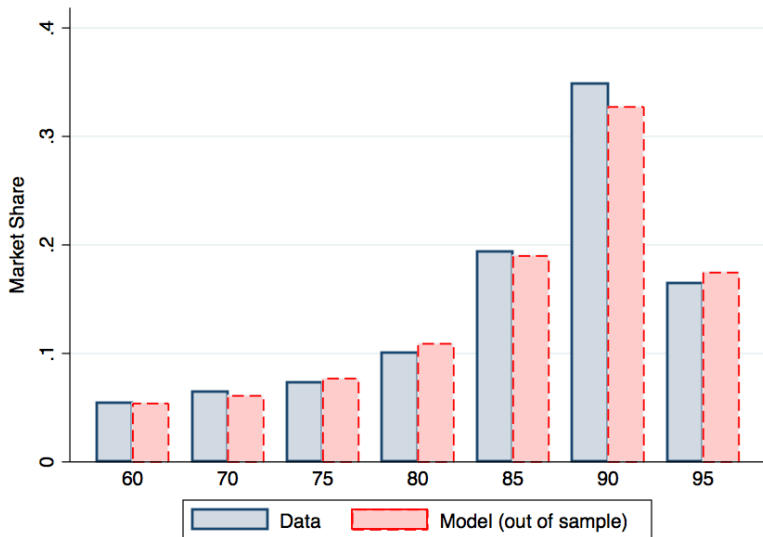


## Initial Fixed Period Fit [▶ Go back](#)



## Loan-to-Value Bands Fit

[Go back](#)



## Search Cost Estimates

[▶ Go Back](#)

	All Borrowers	London	Other Regions	Q1 Income	Q2 Income	Q3 Income	Q4 Income
Mean ( $\mu$ )	3.3	2.9	4.1	3.1	3.3	3.9	5.0
Stand. Dev. ( $\sigma$ )	0.5	0.4	0.7	0.8	0.7	0.5	0.2

[▶ Search Distribution \(Income\)](#)[▶ Search Distribution \(Regions\)](#)

# Marginal Costs

[▶ Go Back](#)

	Total	Direct Sales	Intermediated Sales
<b>All</b>	<b>1.82</b>	<b>1.93</b>	<b>1.79</b>
Lender Type			
Big Six	1.80	1.95	1.71
Challengers	1.84	1.87	1.83
Small Banks	2.31	2.16	2.40
Building Societies	1.87	1.78	1.93
Initial Period			
2-Years	1.73	1.75	1.73
3-Years	1.94	2.02	1.89
5-Years	1.98	2.10	1.84
LTV Band			
LTV $\geq 80$	1.60	1.79	1.50
LTV $>80$	2.03	2.04	2.03

[▶ Marginal Cost Distribution by Sales Channel](#)

	Total	Direct Sales	Intermediated Sales (Pre-Commission)	Intermediated Sales (Post-Commission)
<b>All</b>	<b>22%</b>	<b>28%</b>	<b>32%</b>	<b>18%</b>
Lender Type				
Big Six	22%	26%	36%	20%
Challengers	19%	30%	33%	17%
Small Banks	13%	27%	20%	7%
Building Societies	24%	36%	31%	16%
Initial Period				
2-Years	19%	29%	31%	15%
3-Years	24%	28%	34%	19%
5-Years	25%	27%	37%	23%
LTV Band				
LTV $\geq$ 80	23%	26%	38%	21%
LTV $>$ 80	17%	20%	20%	16%



# Bargaining Parameters

[▶ Go Back](#)

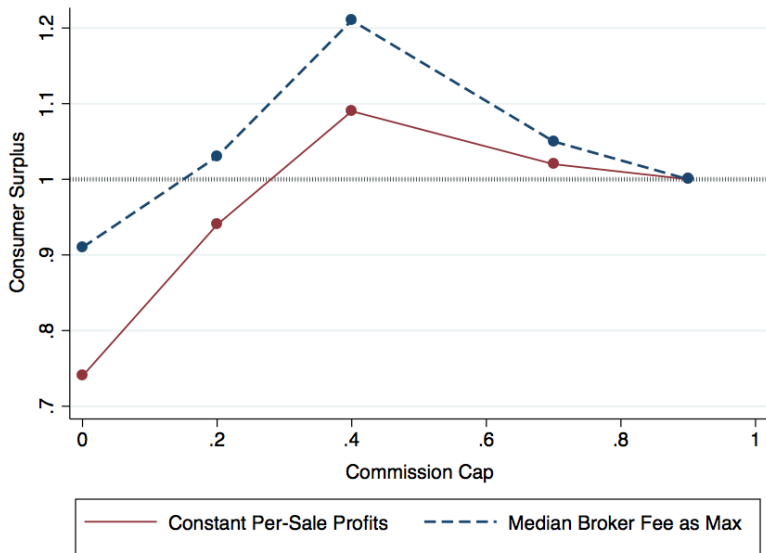
$$\beta_{lb}$$

	Large Brokers	Small Brokers
Big Six	0.72	0.41
Challengers	0.28	0.50
Building Societies	0.61	0.47
Small Banks	0.19	0.51

# Counterfactual Estimates [▶ Go back](#)

	Ban on Commissions	Cap Median Commission
<b>Market Structure</b>		
HHI $\% \Delta$	21%	5%
Share Big Six $\% \Delta$	12%	3%
<b>Pass-Through</b>		
Prices $\% \Delta$	11%	-5%
Marginal Cost $\% \Delta$	9%	-1%
Lender Profits $\% \Delta$	7%	-2%
<b>Demand</b>		
Share Direct $\% \Delta$	115%	30%
Search Costs $\% \Delta$	83%	13%
Consumer Surplus $\% \Delta$	-26%	9%

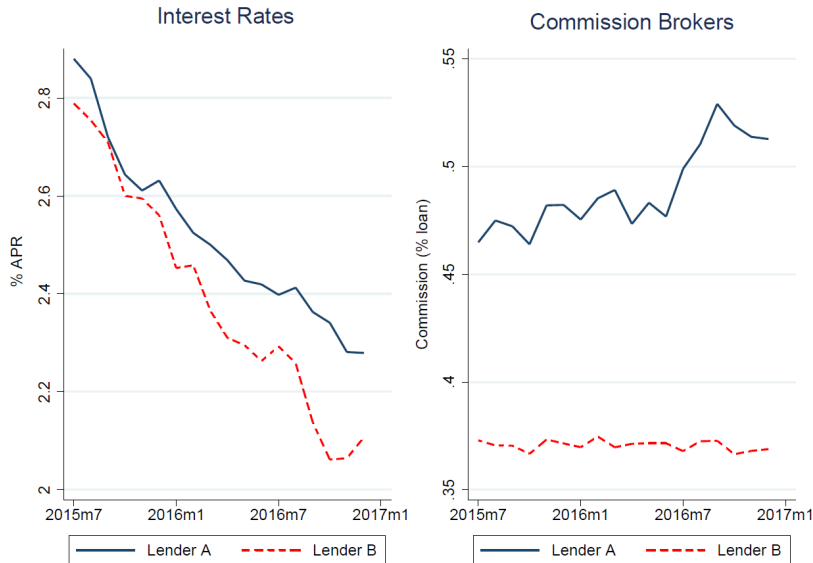
# Broker Fee Pass-Through

[Go back](#)

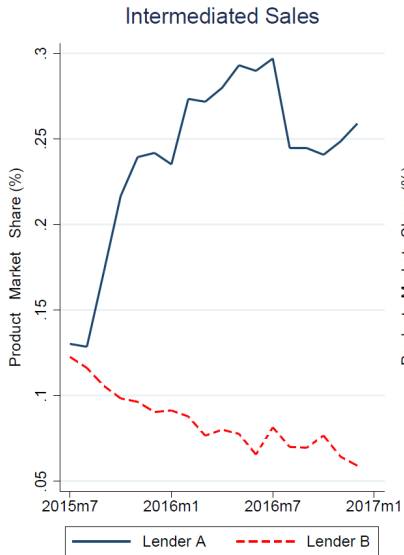
# Counterfactual Estimates [▶ Go back](#)

	Fixed at 0.4%	Fixed at 0.8%
<b>Market Structure</b>		
HHI % $\Delta$	-3%	12%
Share Big Six % $\Delta$	-2%	8%
<b>Pass-Through</b>		
Prices % $\Delta$	-1%	8%
Marginal Cost % $\Delta$	-4%	5%
Lender Profits % $\Delta$	0%	5%
Commission Rates % $\Delta$	-17%	49%
<b>Demand</b>		
Share Direct % $\Delta$	-1%	14%
Search Costs % $\Delta$	-1%	19%
Consumer Surplus % $\Delta$	2%	-11%

## Example: 2-year fixed, 80% LTV for FTBs



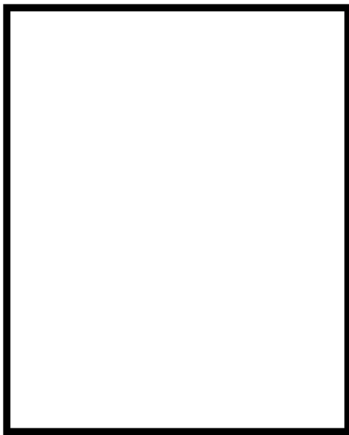
## Example: 2-year fixed, 80% LTV for FTBs [▶ Go back](#)



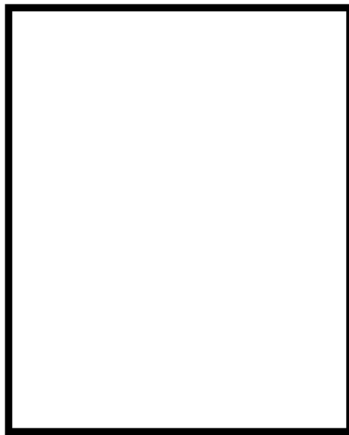
## Differences in Outside Options (Intuition)

[▶ Go back](#)

**LONDON**

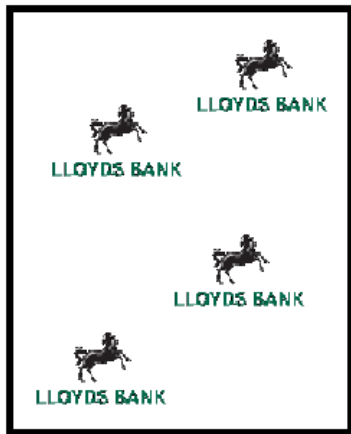


**SCOTLAND**

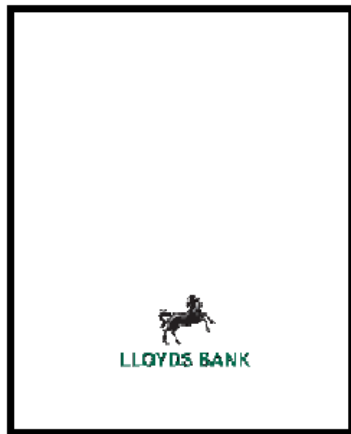


## Differences in Outside Options (Intuition) [▶ Go back](#)

LONDON



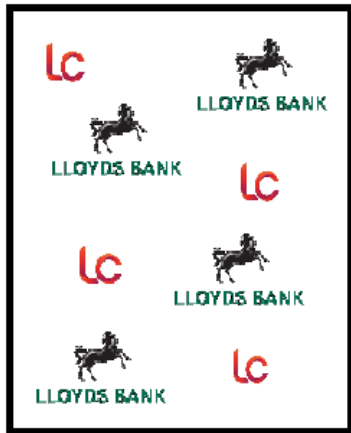
SCOTLAND



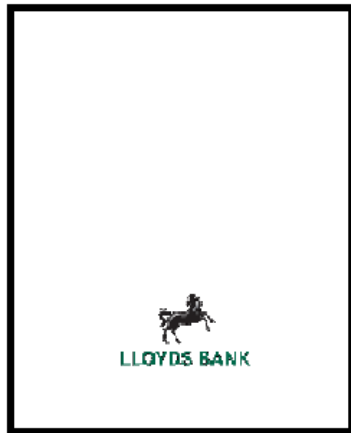


## Differences in Outside Options (Intuition) [▶ Go back](#)

LONDON

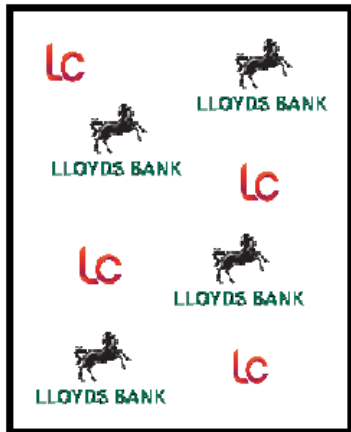


SCOTLAND



## Differences in Outside Options (Intuition) [▶ Go back](#)

LONDON

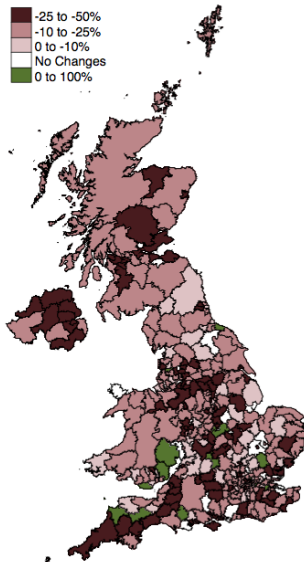


SCOTLAND



# Changes in UK Branch Density (2014-2017)

► Go back



# Total Branches by Lender

[Go back](#)

