



BANK FOR INTERNATIONAL SETTLEMENTS

Market discipline disclosure and moral hazard in banking

by Erlend Nier and Ursel Baumann

Discussion by

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Bank for International Settlements

Rome, 21 March 2003



Important questions

Main question: How does Market Discipline (MD) affect risk choices of banks?

- **Two** dimensions of **risk**: Asset risk and choice of capital
- **Three** dimensions of **MD**: Deposit insurance, inter-bank deposits, disclosure

Relevance: Inform the policy discussion on the desirable mix of supervisory and market mechanisms for financial stability



Methodology and validation

Panel of individual bank data: 729 banks, across 32 countries and 7 years.

Two main regressions:

$$\text{capital}_t = f(\text{risk}_t, \text{MD}_t, \text{controls})$$

$$\text{risk}_t = f(\text{capital}_t, \text{MD}_{t-1}, \text{controls})$$

- Extensive use of proxies for key variables puts the **focus** on the sign and significance of coefficients
- **Validation**: do the results conform with reasonable priors and are they reasonably robust to specification changes?



Main results

- Presence of **moral hazard**: tougher MD is associated with more careful banks
- The effectiveness of MD is enhanced/hampered by the generosity of the **safety net**
- **Non-linearities**: MD is less effective for institutions that are closer to insolvency.



General comments

- ② Impressive coverage and meticulous data work: many variables and some new to the literature
- ② Attention paid to some data limitations
- ② Recognition of the endogeneity problems of the exercise and attempts to address them...
- ④ ...not fully adequately: lack of tight theoretical framework
- ④ Some methodological questions remain



Theory: what is the benchmark?

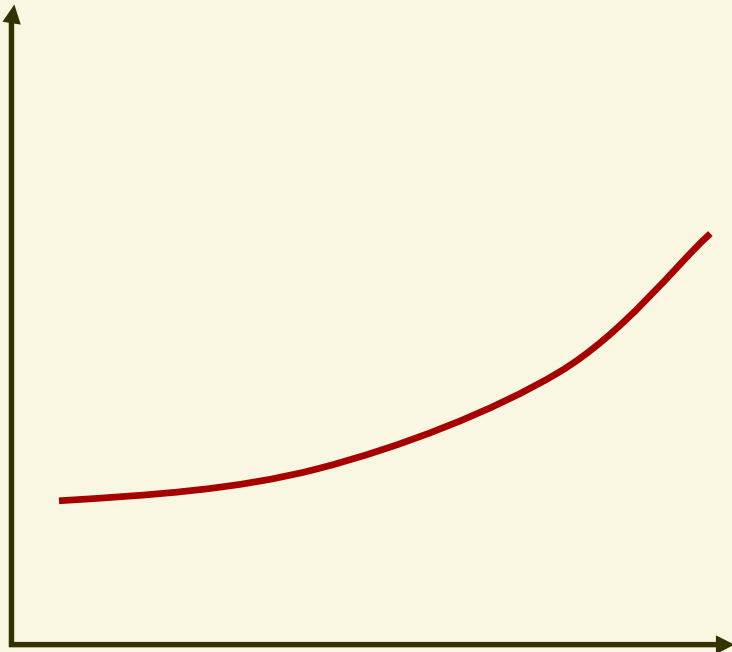
Key background assumption: What is the “neutral” relationship between risk and capital?

- ⑧ Higher asset risk should be associated with higher capital
 - Incentive problems might lead banks to decrease capital ratios when they take more risk.



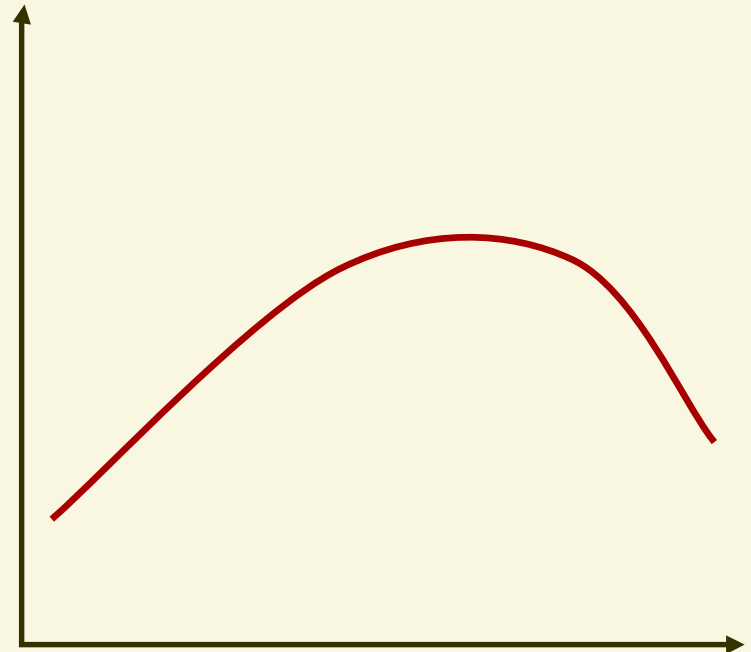
Theory: what is the benchmark?

Capital



Risk

Capital



Risk



Theory: what is the benchmark?

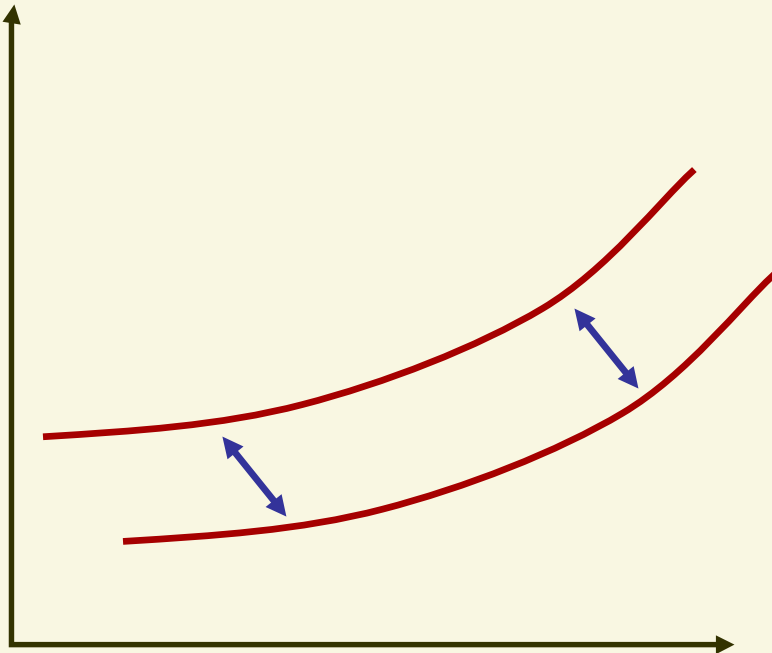
Key background assumption: What is the “neutral” relationship between risk and capital?

- Higher asset risk should be associated with higher capital
- Incentive problems might lead banks to decrease capital ratios when they take more risk.
- A question of balancing private risk and reward
- A function of the regulatory framework



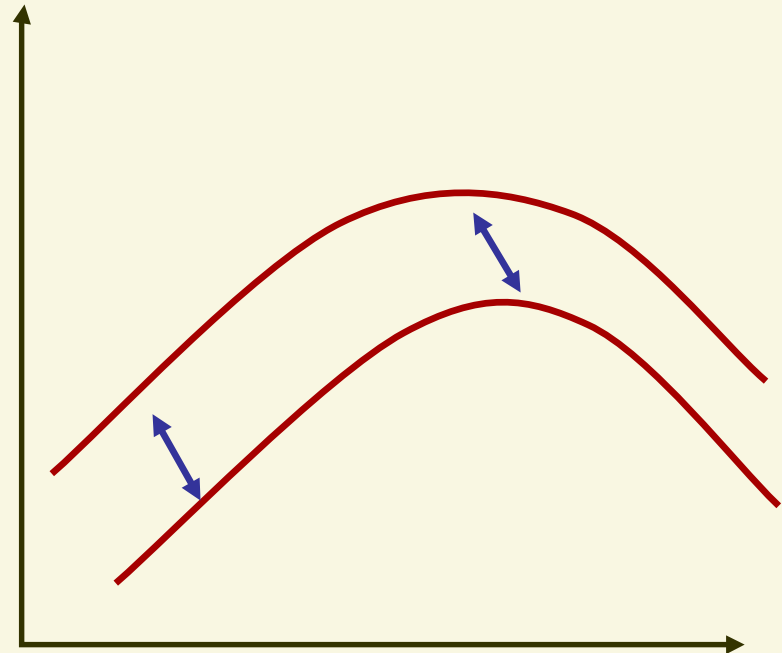
Theory: what is the benchmark?

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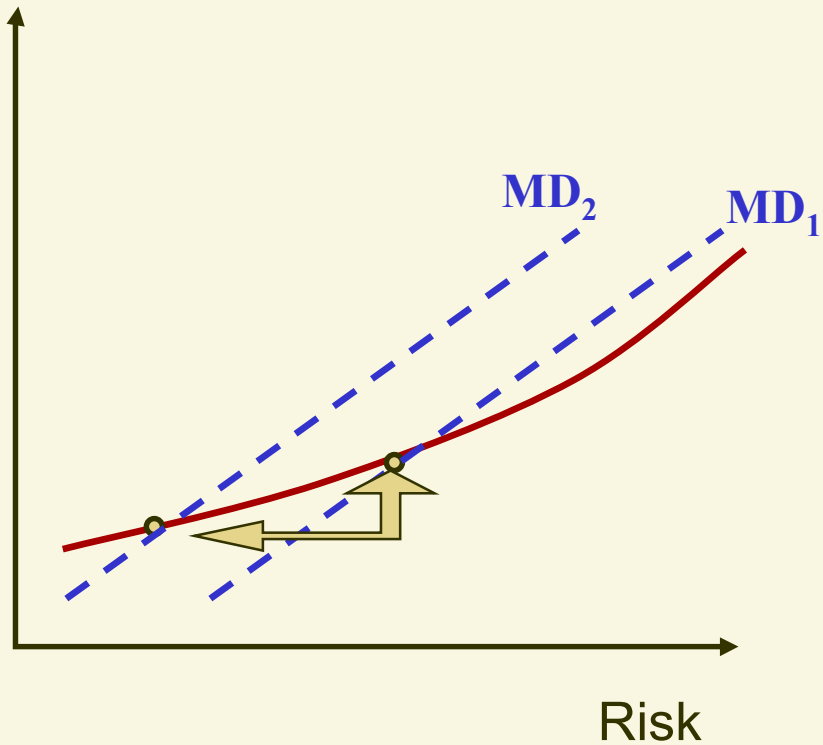


Risk

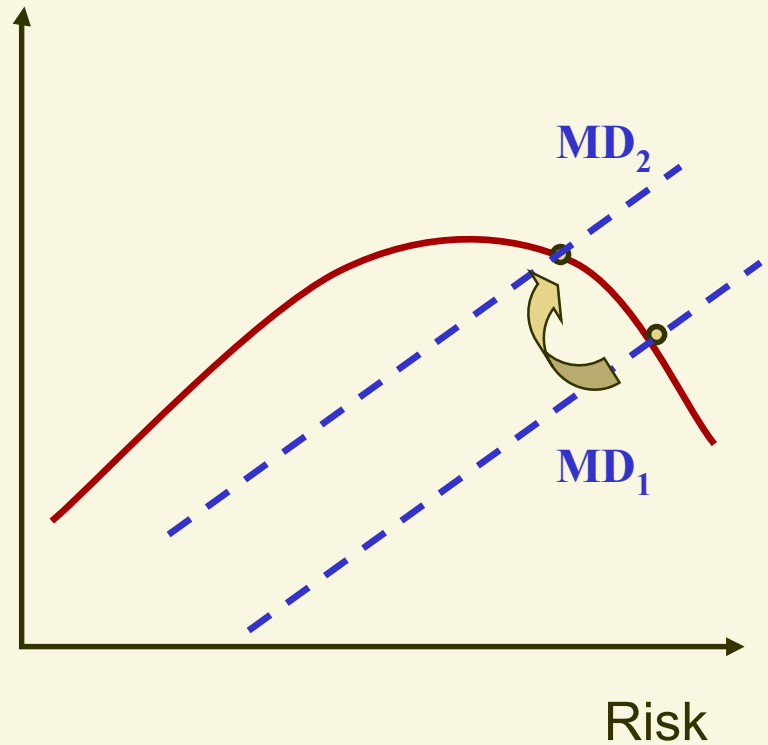


Theory: what is the benchmark?

Capital



Capital





Why care about “serious theory”?

- Serious endogeneity makes fully specified theoretical framework key for interpretation.
- Example: signs of estimated relationship between risk and capital change across models/regressions!
 - $\text{Corr}(\text{capital}, \text{risk}) > 0$ in Capital regressions
 - $\text{Corr}(\text{capital}, \text{risk}) < 0$ in Risk regressions
- Should this be expected or is it a symptom of misspecification?
- Are the variables good proxies?



Specification of regressions

- Country-specific effects are not explicitly incorporated
 - Implicit in definition of deposit insurance and disclosure
- Interaction terms between risk, capital and MD are not present
 - In “risky bank” regressions the classification variables are also included in the regression



Are the variables used good proxies?

- Risk: imperfect measures but paper does obvious thing
 - PC “composite” measure should be explored further
 - Use KMV-style information as risk measure
 - Unclear as to how β and idiosyncratic variance should be interpreted
- Capital: use of risk-weighted measure of assets or deviation between actual and required
- MD: good idea to look into different dimensions
 - Adding up dummies implies equality of importance



Bottom line

- Overall an impressive effort to tackle a tough problem
- The robustness of the sign of the MD effect cannot be easily discarded as a “fluke” of the data
- Interpretation of results, however, demands a more structured economic framework
- The question addressed and the data chosen require further experimentation with the estimation.



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