Microprudential Regulation in a Dynamic Model of Banking

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This paper studies the quantitative impact of microprudential bank regulations on bank lending and value metrics of efficiency and welfare in a dynamic model of banks that are financed by debt and equity, undertake maturity transformation, are exposed to credit and liquidity risks, and face financing frictions. We show that (1) there exists an inverted U-shaped relationship between bank lending, welfare, and capital requirements, (2) liquidity requirements unambiguously reduce lending, efficiency, and welfare, and (3) resolution policies contingent on observed capital, such as prompt corrective action, dominate in efficiency and welfare terms (noncontingent) capital and liquidity requirements. (JEL G21, G28, G33)

The 2007–2009 financial crisis has been a catalyst for significant bank regulation reforms, as the precrisis microprudential regulatory framework has been judged inadequate to cope with large financial shocks. The new Basel III framework envisions a raise in bank capital requirements and the introduction of new liquidity requirements. At the same time, there is an active debate regarding how to make prompt corrective action (PCA) policies and related bank closure rules more effective in reducing the costs of government's bank

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bailouts under deposit insurance.¹ Our study contributes to a sparse literature analyzing microprudential bank regulation in the context of dynamic models of banking.² To our knowledge, there is no study offering a joint assessment of capital regulation, liquidity requirements, and PCA policies in a dynamic model of banks which perform a well-defined intermediation function and deposits are insured. A static or finite horizon model of banks can only partially capture how banks make their policy decisions subject to the true shadow costs associated with regulatory requirements. Formulating such a dynamic model is the main contribution of this paper.

We study a partial equilibrium model in the tradition of the valuation approach pioneered by Merton (1977) and Kareken and Wallace (1978), and design it consistently with standard corporate finance setups adapted to the specifics of banks, as advocated by Flannery (2012). The economy is driven by a macroeconomic (systematic) risk factor, and financial markets are in equilibrium. The banking system is composed of banks exposed to a systematic risk factor and an idiosyncratic risk component. Investors' preferences are represented by a stochastic discount factor that is parameterized as in Jones and Tuzel (2013), and it delivers countercyclical risk premia. With this pricing kernel, we evaluate banks' securities and derive measures of bank efficiency and welfare.

Three features characterize our model. First, we analyze banks that dynamically transform short-term liabilities into longer-term partially illiquid assets whose returns are uncertain. This feature is consistent with banks' special role in liquidity transformation, as banks in our model can be viewed as a dynamic infinite horizon version of the intermediaries studied by Diamond and Dybvig (1983) and Allen and Gale (2007). Second, we consider banks whose deposits are insured. Deposit insurance is introduced because a key asserted role of capital regulation is the abatement of the excessive bank risk taking arising from moral hazard under partial or total insurance of its liabilities. Thus, there is a potential role for capital requirements, and their effectiveness in abating banks' probability of default can be assessed. Third, banks can be in financial distress. Such distress can be viewed as arising from market incompleteness of the type analyzed by Allen and Gale (2004) as well as from asymmetric information frictions that make equity issuance costly and make banks unable to raise uncollateralized debt. These assumptions are meant to capture an environment in which liquidity requirements may in principle have

¹ The new Basel III framework is detailed in *Basel III: A global regulatory framework for more resilient banks and banking systems*, Bank for International Settlements, Basel, June 2011. For a discussion of PCA reforms, see Government Accountability Office, Bank Regulation: Modified Prompt Corrective Action Framework Would Improve Effectiveness, Washington DC, June 2011.

² Calem and Rob (1999) models banks of fixed size that do not issue equity. Bhattacharya et al. (2002) and Peura and Keppo (2006) consider capital regulation only with bank closure rules implemented under banks' random audits. Estrella (2004) considers bank regulatory restrictions on value at risk, whereas Elizalde and Repullo (2007) and Zhu (2008) consider capital regulation under simple bank closure rules.

a role in minimizing the risk that illiquid, but solvent, banks become insolvent, and face increased costs to raise funding in case of financial distress.

We assess the impact of microprudential bank regulation in terms of value metrics of bank efficiency and welfare. The first metric is enterprise value, which is interpreted as the efficiency with which the bank carries out its maturity transformation function. The second metric, called "social value," proxies the contribution to welfare associated with banking activities, as measured by the discounted expected value of banks to all bank stakeholders and the government. In the sequel, we refer to this metric interchangeably as social value or welfare.

The optimal polices and metrics of efficiency and welfare of unregulated banks are our benchmarks. Relative to these benchmarks, we compare policies and value metrics of efficiency and welfare of banks subject to (1) capital requirements resembling risk-based Basel II-type capital requirements, (2) capital requirements and liquidity requirements resembling Basel-III liquidity coverage ratios, and (3) a PCA provision that implements capital requirements through restrictions on banks' payouts and a bank closure rule, both *contingent* on observed levels of capital. We assess the impact of these bank regulations quantitatively by simulating the model of a banking industry composed of banks exposed to the same risks under a set of calibrated parameters, with regulatory parameters mimicking current regulations. Because banks are exposed to the same risks, we evaluate the impact of these regulations on a representative bank.

The analysis of bank optimal policies along the business cycle yields two main results. First, under a mild capital requirement and the PCA, bank lending, debt, and capital ratios are positively correlated with the systematic risk factor and the correlations are lower than the ones exhibited by unregulated banks. On the other hand, liquidity ratios are more negatively correlated with systematic risk than in the unregulated case. In particular, these results suggest that riskbased capital regulation does not necessarily enhance the procyclicality of bank lending. Second, when liquidity requirements are added to capital requirements, the positive correlation between capital ratios and the systematic risk factor increases, especially in upturns. This happens because liquidity requirements force banks to use retained earnings to build up liquidity buffers rather than invest in lending. As a result, capital ratios become inflated in an upturn, but they are not different from those of banks subject to capital regulation only in a downturn. In other words, capital regulation and the PCA provide banks with incentives to create liquidity buffers in downturns. With mandatory liquidity requirements, however, banks are forced to build these buffers during upturns as well, thereby depressing lending.

The steady-state (or unconditional) analysis of the model delivers three key results. First, there exists an inverted U-shaped relationship between bank lending and the stringency of capital requirements. Such a relationship translates into an inverted U-shaped relationship between welfare and the stringency of capital requirements. When capital requirements are mild, banks

find it optimal to fulfill them through an increase in lending. This increase allows banks to build up capital through increased revenues and retained earnings. Relative to unregulated banks, the quantitative increase in bank lending due to mild capital requirement is a notable 15% in our calibration. Banks' probability of default is also lower than that of their unregulated counterparts, indicating that capital requirements are successful in reducing banks' failures. However, if capital requirements become too stringent, then banks find it optimal to fulfill them through a reduction of lending, because lending exhibits decreasing returns, and building equity through increased revenues and retained earnings becomes too costly. These novel findings suggest the existence of optimal levels of bank-specific regulatory capital under deposit insurance.

Second, liquidity requirements reduce bank lending, efficiency, and welfare, with these reductions increasing monotonically with their stringency. This occurs because liquidity requirements severely hamper banks' maturity transformation, forcing banks to use retained earnings to increase bond holdings or reduce indebtedness, rather than investing them in lending. Moreover, when liquidity requirements are added to capital requirements, they also destroy the efficiency and welfare benefits of mild capital requirements, because bank lending, efficiency, and social values are reduced relative to the bank subject to capital regulation only. Quantitatively, the declines in bank lending and value metrics of efficiency and welfare associated with liquidity requirements are large, namely, in the order of 20%–25% in our calibration.

Third, a resolution procedure contingent on observed bank capitalization, such as the PCA, dominates both capital and liquidity requirements in efficiency and welfare terms. Recall that deposit insurance introduces incompleteness in deposit contracts, as deposit payments are not contingent on the realization of states of nature. This is inefficient, as these contingencies may be instrumental in attaining optimality in banking environments similar to ours (see, e.g., De Nicolò 1996; Allen and Gale 1998). Noncontingent capital and liquidity requirements are insufficient for, or even detrimental to, attaining optimality. By contrast, the PCA introduces contingencies based on observed equity. These contingencies substitute for the missing contingencies in deposit payments due to deposit insurance. Thus, resolution procedures, such as the PCA, appear a necessary tool to achieve optimality of bank regulation.

1. The Model

Time is discrete, the horizon is infinite, and a systematic (macroeconomic) risk drives risk premia in a financial market equilibrium. The systematic risk is denoted by u and follows an autoregressive process

$$u_t = \kappa_u u_{t-1} + \sigma_u \varepsilon_t^u, \tag{1}$$

where ε_t^u is i.i.d. with a truncated standard normal distribution, κ_u is the autocorrelation parameter such that $|\kappa_u| < 1$, and σ_u is the conditional standard deviation.

Following Jones and Tuzel (2013), the preferences of the representative investor are summarized by a one-period stochastic discount factor. Given the transition to state u_{t+1} from the current state, u_t , the stochastic discount factor is

$$M(u_t, u_{t+1}) = \beta e^{-g_t \varepsilon_{t+1}^u - \frac{1}{2} g_t^2 \sigma_u^2},$$
(2)

where the state-dependent coefficient of risk-aversion is defined as $g_t = g(u_t) = \exp(\gamma_1 + \gamma_2 u)$, with $0 < \beta < 1$, $\gamma_1 > 0$ and $\gamma_2 < 1$. Using this pricing kernel, we will later on evaluate banks' securities.³

There is a finite set of heterogeneous banks indexed by j. Bank managers maximize shareholders' value, so there are no managerial agency conflicts. Banks receive a random stream of short-term insured deposits, can issue risk-free short-term collateralized debt, and invest in longer term risky productive assets and short-term bonds. Thus, banks are exposed to credit and liquidity risks. As detailed below, these risks are assumed to be affine functions of a systematic risk factor and a bank idiosyncratic risk factor. The bank idiosyncratic risk factor v^{j} follows an autoregressive process

$$v_t^j = \kappa_v v_{t-1}^j + \sigma_v \varepsilon_t^j, \tag{3}$$

where ε_t^j is i.i.d. with truncated standard normal distribution, and $|\kappa_v| < 1$. We assume that ε_{t+1}^u is independent of ε_{t+1}^j for all *j*'s and that the latter is independent across banks. The random vector $s_t = (u_t, v_t)$ evolves according to a stationary and monotone Markov transition function $Q(s_{t+1}|s_t)$ jointly defined by Equations (1) and (3). We denote S the state space of *s*, where Sis compact.⁴ In the remainder of this section, we drop the superscript *j*, as we will be solving a representative bank problem.

1.1 Bank's balance sheet

On the asset side, a bank can invest in a liquid, one-period bond (a Treasury bill), which yields a constant rate r_f , and in a portfolio of risky assets, called loans. We denote with B_t the face value of the risk-free bond, and with $L_t \ge 0$ the nominal value of the stock of loans outstanding in period t (i.e., in the time interval (t-1,t]). Note that because B_t can have unrestricted sign, we assume it is the net position in bonds, thereby allowing the bank to simultaneously borrow or lend at the rate r_f . Similarly to Zhu (2008), we make the following assumptions.

³ Other partial equilibrium approaches based on a reduced-form stochastic discount factor are Berk, Green, and Naik (1999) and Zhang (2005). Differently from other functional forms of stochastic discount factors, the one assumed by Jones and Tuzel (2013) has the convenient property of having a state-independent risk-free discount factor: in our case, the gross yield of a risk-free zero coupon bond is $1/\mathbb{E}_t [M_{t+1}]$, where $\mathbb{E}_t [M_{t+1}] = \beta e^{-\frac{1}{2}g_t^2 \sigma_u^2} \cdot \mathbb{E}_t \left[e^{-g_t \varepsilon_{t+1}^u} \right] = \beta$.

⁴ As detailed in Appendix C, the support of each state variable u and v is a compact set discretized using Rouwenhorst' (1995) approach.

Assumption 1 (Revenue function). The total revenue from loan investment is given by $Z_t \pi(L_t)$, where $\pi(L_t)$ satisfies $\pi(0)=0, \pi>0, \pi'>0$, and $\pi''<0$.

This assumption is empirically supported, as there is evidence of decreasing return to scale of bank investments.⁵ In our model loans can be viewed as including traditional loans and as risky securities. $Z_t = Z(u_t, v_t)$ is a random *credit shock* realized on loans in the same time period, which captures variations in banks' total revenues as determined by the systematic and idiosyncratic shocks. Note that the choice variables B_t and L_t are set at the beginning of the period, whereas Z_t is realized only at the end of the period.

The maturity of deposits is set to one period. Bank maturity transformation is introduced with the following:

Assumption 2. A constant proportion $\delta \in (0, 1/2)$ of the existing stock of loans at t, L_t , becomes due at t+1.

The parameter $\delta < 1/2$ indexes the average maturity of the existing stock of loans, which is $1/\delta - 1 > 1.^6$ Thus, the bank is engaging in maturity transformation of short-term liabilities into longer-term investments, as in Diamond and Dybvig (1983). Under Assumption 2, the law of motion of L_t is

$$L_t = L_{t-1}(1-\delta) + I_t,$$
 (4)

where I_t is the investment in new loans if it is positive, or the amount of cash obtained by liquidating loans if it is negative.

Convex asymmetric loan adjustment costs as in the Q-theory of investment (see, e.g., Abel and Eberly 1994) are introduced to capture banks' information production costs about credit quality

Assumption 3 (Loan adjustment costs). The adjustment cost function for loans is quadratic:

$$m(I_t) = |I_t|^2 \left(\chi_{\{I_t > 0\}} \cdot m^+ + \chi_{\{I_t < 0\}} \cdot m^- \right), \tag{5}$$

where $\chi_{\{A\}}$ is the indicator of event A, $m^+ > 0$ and $m^- > 0$ are the unit cost parameters, and costs are deducted from profits.

According to Assumption 3, a bank incurs screening and monitoring per-unit costs m^+ when it increases lending, and per-unit liquidation costs m^- when loans are reduced. If $m^- > m^+$, then there is costly reversibility, because a bank

⁵ See for instance, Berger et al. (2005), Carter and McNulty (2005), and Cole, Goldberg, and White (2004).

⁶ The (weighted) average maturity of existing loans at date *t*, assuming the bank neither default nor makes any adjustments on the current investment in loans, is $\sum_{s=0}^{\infty} s \frac{\delta L_{t+s}}{L_t} = \frac{1}{\delta} - 1$, as the residual loans outstanding at date t+s, $s \ge 0$, is $L_{t+s} = L_t (1-\delta)^s$.

would face higher costs to liquidate investments rather than for expanding them. This assumption is consistent with costs of breaking bank relationships higher than those associated with an expansion of lending to old as well as to new customers.⁷ The magnitude of these loan adjustment costs will be pinned down in our calibration.

On the liability side, the bank receives a random amount of one-period deposits $D_{t+1} = D(u_t, v_t)$ at the beginning of period t+1, and this amount remains outstanding during the period. The interest rate on deposits is $r_d \le r_f$, where the difference between the rate on bonds and the remuneration of deposits captures implicit costs of payment services associated with deposits. The change $D_{t+1} - D_t$ is an exogenous *liquidity shock* driven by the realizations of systematic and idiosyncratic shocks.

Deposits are insured according to the following

Assumption 4 (Deposit insurance). The deposit insurance agency insures all deposits. In the event that a bank defaults on deposits and on the related interest payments, depositors are paid interest and principal by the deposit insurance agency, which absorbs the relevant loss.

Under this assumption, with no change in the model, the depositor can be viewed as the deposit insurance agency itself, whose claims are risky, while deposits are effectively risk-free from depositors' standpoint. Thus, the difference between the ex ante yield on deposits and the rate on bonds can be viewed as including a subsidy that the agency provides to the bank, as the cost of this insurance is not charged to either banks or depositors.

To fund operations, a bank can issue one-period bonds and equity. Following Hennessy and Whited (2005), we assume that a bank is constrained to issue fully collateralized bonds, so that the bond yield is the rate r_f . We denote $B_t < 0$ the notional amount of the bond issued at t - 1 and outstanding until t. The collateral constraint is described below.

To summarize, at t - 1 (i.e., at the beginning of period t), after the investment and financing decisions have been made, a bank's balance sheet equation is

$$L_t + B_t = D_t + K_t, \tag{6}$$

where *K* denotes the ex ante book value of equity, or bank capital. Note that B > 0 denotes a positive risk-free investment (net of issued bonds), whereas B < 0 denotes the face value of issued bond (net of risk-free investment).

1.2 Bank cash flow

Once Z_t and D_{t+1} are realized at t, the current state (before a decision is made) is summarized by the vector $x_t = (L_t, B_t, D_t, u_t, v_t)$, as a bank enters date t with

⁷ For the costs associated with breaking up bank relationships as forgone monopoly rents due to holdup problems, see Rajan (1992) and Sharpe (1990). A portion of liquidation costs m^- could also be viewed as capturing fire sales costs arising from financial distress (see, e.g., Acharya, Shin, and Yorulmazer 2011; Hanson, Kashyap, and Stein 2011).

loans, bonds, and deposits in amounts L_t , B_t , and D_t , respectively. Prior to investment, financing, and cash distribution decisions, the total internal cash available to a bank is

$$W_t = W(x_t) = y_t - \mathcal{T}(y_t) + B_t + \delta L_t + (D_{t+1} - D_t).$$
(7)

Equation (7) says that total internal cash W_t equals earnings before taxes (EBT),

$$y_t = y(x_t) = \pi(L_t)Z_t + r_f B_t - r_d D_t,$$
 (8)

minus corporate taxes $\mathcal{T}(y_t)$, plus the principal of one-year investment in bond maturing at t, $B_t > 0$ (or alternatively the amount of maturing one-year debt, $B_t < 0$), plus the repayment of maturing loans δL_t , plus the net change in deposits, $D_{t+1} - D_t$.

Consistently with current dynamic models of a nonfinancial firm (see, e.g., Hennessy and Whited 2007), corporate taxation is introduced with the following:

Assumption 5 (Corporate taxation). Corporate taxes are paid according to the following convex function of EBT:

$$\mathcal{T}(y_t) = \tau^+ \max\{y_t, 0\} + \tau^- \min\{y_t, 0\}, \tag{9}$$

where τ^- and τ^+ , $0 \le \tau^- \le \tau^+ < 1$, are the marginal corporate tax rates in case of negative and positive EBT, respectively.

The assumption $\tau^- \leq \tau^+$ is standard in the literature, as it captures a reduced tax benefit from loss carryforward or carrybacks.

Given the available cash W_t as defined in Equation (7) and the residual loans, $L_t(1-\delta)$, a bank chooses the new level of investment in loans, L_{t+1} and the amount of risk-free bonds B_{t+1} (purchased if positive, issued if negative). As a result, Equation (6) applies to B_{t+1} , L_{t+1} , and D_{t+1} , and both L_{t+1} and B_{t+1} remain constant until the next decision date, t+1.

These choices may differ according to whether or not a bank is in financial distress. If total internal cash W_t is positive, it can be retained or paid to shareholders. If W_t is negative, a bank is in *financial distress*, because absent any action, it would be unable to honor part, or all, of its obligations towards the tax authority, depositors, or bondholders. When in financial distress, a bank can finance the shortfall W_t by liquidating loans, by issuing bonds ($B_{t+1} < 0$), or by injecting equity capital. Overcoming this shortage of liquidity is expensive because all these transactions generate either explicit or implicit costs. In liquidating loans, a bank incurs the downward adjustment cost defined by Equation (5), bond issuance is subject to a collateral restriction that can limit bank debt capacity, and underwriting costs are paid when seasoned equity is offered. We now present these latter two restrictions on the financial channels of a bank.

Bond issuance is constrained by the following:

Assumption 6 (Collateral constraint). If $B_t < 0$, the amount of bond issued by the bank must be fully collateralized. In particular, the constraint is

$$L_t - m(-L_t(1-\delta)) + \pi(L_t)Z_d - \mathcal{T}(y_t^{\min}) - r_d)D_t + B_t(1+r_f) + D_d - D_t \ge 0,$$
(10)

where Z_d is the worst possible credit shock (i.e., the lower bound of the support of Z), D_d is the worst-case scenario flow of deposits, and $y_t^{\min} = \pi(L_t)Z_d + r_f B_t - r_d D_t$ is the EBT in the worst-case end-of-period scenario for current L_t , B_t and D_t .

The constraint in Equation (10) reads as follows: the end-of-period amount $B_t(1+r_f)$ that the bank has to repay must not be higher than the after-tax operating income, $\pi(L_t)Z_d - r_d D_t - \mathcal{T}(y_t^{\min})$ in the worst-case scenario, plus the total available cash obtained by liquidating the loans, $L_t - m(-L_t(1-\delta))$, plus the flow of new deposits in the worst-case scenario, D_d , net of the claim of current depositors, D_t . Available cash would then be the sum of the loans that will become due, $L_t\delta$, plus the amount that can be obtained by a forced liquidation of the loans, $L_t(1-\delta)$ net of the adjustment cost $m(-L_t(1-\delta))$, as per Equation (5).⁸ An obvious implication of this constraint is that a bank's indebtedness will be always bounded above.

We denote with $\Gamma(D_t)$ the feasible set for a bank when the current deposit is D_t , defined as the set of (L_t, B_t) such that condition (10) is satisfied if $B_t < 0$, with no restrictions being imposed when $B_t \ge 0$:

$$\Gamma(D_t) = \{(L_t, B_t) \mid \\ \frac{L_t - m(-L_t(1-\delta)) + D_d + \pi(L_t) Z_d(1-\tau_t^{\min})}{1 + r_d(1-\tau_t^{\min})} + B_t \frac{1 + r_f(1-\tau_t^{\min})}{1 + r_d(1-\tau_t^{\min})} \ge D_t, \\ B_t < 0\} \cup \{B_t \ge 0\}, \quad (11)$$

where $\tau_t^{\min} = \tau^+$ if $y_t^{\min} > 0$ and $\tau_t^{\min} = \tau^-$ if $y_t^{\min} < 0$.

Similarly to Cooley and Quadrini (2001), we assume that issuing equity is costly according to the following assumption.

Assumption 7 (Equity issuance costs). A bank raises capital by issuing seasoned shares incurring a proportional cost $\lambda > 0$ on the value of new equity issued.

Observe that when banks are not in financial distress, total costs of equity issuance will be just a proportion of the total amount of equity issued. When

⁸ By assumption 9 introduced below, the support for deposits and credit shock processes is compact, implying that the collateral constraint is well defined.

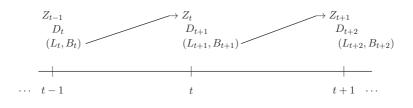


Figure 1 Bank's dynamic

Evolution of the state variables (credit shock, Z, and deposits, D) and of the bank's control variables (cash and liquid investments, B, and loans, L), assuming the bank is solvent at each date.

banks are in financial distress, however, the cost of equity issuance will be increased by an additional amount that the bank has to raise, owing to loan liquidation costs. Therefore, the more severe the financial distress, the larger the transaction cost incurred to raise equity financing.⁹

As a result of the choice of (L_{t+1}, B_{t+1}) , the residual cash flow to shareholders at date t is

$$U_t = U(x_t, L_{t+1}, B_{t+1}) = W_t - B_{t+1} - L_{t+1} + L_t(1-\delta) - m(I_{t+1}).$$
(12)

If U_t is positive, it is distributed to shareholders (as either dividends or stock repurchases). If U_t is negative, it equals the amount of newly issued equity inclusive of the higher cost due to underwriting fees. Hence, the actual cash flow to equity holders is

$$e_t = e(x_t, L_{t+1}, B_{t+1}) = \max\{U_t, 0\} + \min\{U_t, 0\}(1+\lambda).$$
(13)

Figure 1 depicts the evolution of the state variables and the related bank's decisions when the bank is solvent.

Lastly, bank's insolvency occurs according to the following:

Assumption 8 (Insolvency). In the case of default, bank shareholders exercise the limited liability option (i.e., equity value is zero), and the assets are transferred to the deposit insurance agency, net of bankruptcy costs in proportion $\eta > 0$ of the size of a bank, proxied by the face value of deposits, D_t . Right after default a bank is reorganized as a new entity endowed with deposits D_{t+1} and new capital $K_{t+1} = D_u - D_{t+1} \ge 0$, where D_u is the upper bound of deposit process. The restructured bank invests initially only in risk-free bonds, $B_{t+1} = D_u$, so that $L_{t+1} = 0$. The capital injected by the government in the new bank is financed with general tax proceeds.

⁹ Note that even though we make the simplifying assumption that the costs of debt and equity issuance costs are independent, thus assuming some segmentation of equity and debt markets, the shadow costs associated with these two forms of financing are not necessarily independent, because the shadow cost of debt will be determined by the extent to which banks have spare debt capacity, whereas, as observed, total equity issuance costs are increasing in the degree of financial distress.

Assumption 8 embeds three features. First, because default is irreversible, a new bank financed with initial public capital is formed to replace a defaulted bank in order to preserve intermediation services. Second, when the government intervenes and sets up a new bank, it does not incur any underwriting cost, because no new shares are issued in the open market. Lastly, the government is assumed to be able to finance any recapitalization of an individual bank with general tax proceeds.¹⁰

The mapping of systematic and idiosyncratic risk factors onto credit and liquidity risks is defined by the following:

Assumption 9. The random vector $X_t = (Z_t, \log D_{t+1})$ is an affine function of the state variable $s_t = (u_t, v_t)$:

$$X_t = \mu + Ns_t, \tag{14}$$

for given two-dimensional vector μ and two-times-two nonsingular matrix N.

In particular, this assumption translates into the following law of motion for $(Z_t, \log D_{t+1})$:

$$Z_t = (1 - \kappa_Z)\overline{Z} + \kappa_Z Z_{t-1} + \xi_t^Z$$

$$\log D_{t+1} = (1 - \kappa_D)\log \overline{D} + \kappa_D \log D_t + \xi_t^D.$$
(15)

In the above equations, κ_Z is the persistence parameter, σ_Z is the conditional volatility, and \overline{Z} is the long-term average of the credit shock; κ_D is the persistence parameter for the deposit process; σ_D is the conditional volatility; and \overline{D} is the long-term level of deposits. The error terms (ξ_t^Z, ξ_t^D) are related to $(\varepsilon_t^u, \varepsilon_t)$ and have correlation coefficient ρ . The parameters of the process (Z_t, D_{t+1}) are estimated on data. In Appendix B we detail how the parameters of the process (Z_t, D_{t+1}) .

$$\left[L_t - m(I_{t+1}) + \pi(L_t)Z_t - \mathcal{T}(y_t) + B_t(1+r_f) - D_t(1+r_d) + D_{t+1}\right] - B_{t+1} - L_{t+1}.$$

The collateral constraint implies

$$L_t - m(-L_t(1-\delta)) + \pi(L_t)Z_d - \mathcal{T}(y_t^{\min}) + B_t(1+r_f) - D_t(1+r_d) + D_d \ge 0.$$

The part in brackets in the cash flow expression is nonnegative. Hence, the cash flow to equity holders can be negative only if L_{t+1} is significantly higher than $-B_{t+1}$. However, if the bank defaults, such a policy will be undone (and set at levels $B_{t+1} = D_u$, $L_{t+1} = 0$, as specified later). Therefore, shareholders will get a positive value by avoiding default. Therefore, in the model, default of a nonregulated bank may occur only when $B_t \ge 0$.

¹⁰ Observe that no default can occur if $B_t < 0$ owing to the collateral constraint. From Equation (12), the cash flow to shareholders is

1.3 The unregulated bank program and the valuation of securities

Let *E* denote the market value of bank's equity. Given the state, $x_t = (L_t, B_t, D_t, u_t, v_t)$, bank's equity value is the result of the following program

$$E(x_t) = \max_{\{(L_{i+1}, B_{i+1}) \in \Gamma(D_{i+1}), i=t, \dots, T\}} \mathbb{E}_t \left[\sum_{i=t}^T e(x_i, L_{i+1}, B_{i+1}) \prod_{j=t}^i M(x_{j-1}, x_j) \right],$$
(16)

where $\mathbb{E}_t[\cdot]$ is the expectation operator conditional on D_t , on the state variables at t, (u_t, v_t) , and on the decision (L_{t+1}, B_{t+1}) ; $M(x_t, x_{t+1})$ is a discount factor defined in Equation (2) (which only depends on the component u_t of x_t), such that $M(x_{t-1}, x_t) = 1$ at t; (L_{i+1}, B_{i+1}) is the decision at date i, for i = t, ..., and Tis the default date. Because the model is stationary and the Bellman equation involves only two dates (the current, t, and the next one, t + 1), we can drop the time index t and use the notation without a prime for the current value of the variables, and with a prime to denote the next-period value of the variables. The value of equity satisfies the following Bellman equation

$$E(x) = \max\left\{0, \max_{(L',B')\in\Gamma(D')}\left\{e(x,L',B') + \mathbb{E}\left[M(x,x')E(x')\right]\right\}\right\}.$$
 (17)

Compactness of the feasible set of a bank and standard properties of the value function are described in Appendix A.

When a bank is solvent, the value of equity satisfies the following Bellman equation:

$$E(x) = \max_{(L',B')\in\Gamma(D')} \{ e(x,L',B') + \mathbb{E}[M(x,x')E(x')] \}.$$
 (18)

We denote with $(L^*(x), B^*(x))$ the optimal policy when the bank is solvent. When it is insolvent, shareholders exercise the limited liability option, which puts a lower bound on *E* at zero. The default indicator function is denoted $\Delta(x)$.

We solve Equation (17) to determine the value of equity and the optimal policy, including the optimal default policy, Δ , as functions of the current state, *x*. We denote φ , the state transition function based on the optimal policy:

$$\varphi(x) = \begin{pmatrix} L^* \\ B^* \\ D' \end{pmatrix} (1 - \Delta) + \begin{pmatrix} 0 \\ D_u \\ D' \end{pmatrix} \Delta.$$
(19)

Equation (19) says that the new state is (L^*, B^*, D') if the bank is solvent, and $(0, D_u, D')$ if the bank defaults. In case of default, a new bank is started endowed with seed capital $D_u - D'$ and deposits, D', and a cash balance D_u , and no loans. This new bank will revise its investment (together with the financing) policy in the following decision dates.

The end-of-year cash flow from current deposits, D_{t+1} , for a given realization of the exogenous state variables, (Z_{t+1}, D_{t+2}) , and on the related optimal policy,

is

$$f(x_{t+1} | \varphi(x_{t+1})) = D_{t+1}(1+r_d)(1-\eta \Delta(x_{t+1})).$$
(20)

Hence, the ex ante fair value of newly issued deposits at t, from the viewpoint of the deposit insurance agency (i.e, incorporating the risk of bank's default), is

$$F(x_t) = \mathbb{E}_t [M(x_t, x_{t+1}) f(x_{t+1} | \varphi(x_{t+1}))] = D_{t+1} (1 + r_d) (1 - \eta P(x_t)), \quad (21)$$

where $P(x_t) = \mathbb{E}_t[M(x_t, x_{t+1})\Delta(x_{t+1})]$ is the price of the relevant default contingent claim. Dropping the dependence on the calendar date,

$$F(x) = D'(1+r_d)(1-\eta P(x)).$$
(22)

1.4 Value metrics of bank efficiency and welfare

A standard valuation concept is the market value of bank assets E(x) + f(x) - f(x) = 0 B^{-} , where $f(x) = D(1+r_d)(1-\eta\Delta(x))$ from Equation (20), $B^{-} = \min\{B, 0\}$, which includes the contribution of (cash-equivalent) one-period bonds B to bank's value, because bond investment helps reduce the potential costs triggered by high cash flow volatility. However, this definition of market value does not capture the role of banks as maturity transformers of liquid liabilities into longer-term productive assets (loans). One of the key economic contributions of banks identified in the literature is their role in efficiently intermediating funds toward their best productive use (see, e.g., Diamond 1984; Boyd and Prescott 1986). Banks play no such role if they just raise funds to acquire risk-free (cash-equivalent) bonds. A suitable metric of bank efficiency is the enterprise value of a bank, defined as $EV(x) = (E(x) + f(x) - B^{-}) - B^{+}$, with $B^+ = \max\{B, 0\}$. The enterprise value is thus the market value of equity plus the value of deposits net of cash balances, or plus short-term debt, capturing a bank's ability to create "productive" intermediation.¹¹ Because $B = B^+ + B^-$, the enterprise value of the bank can be also written as EV(x) = E(x) + f(x) - B.

Our welfare metric of bank activities, called "social value," is defined as the sum of the values of banks' activities to the government and to all banks' stakeholders. In essence, this metric measures the *contribution* to welfare of bank activities. The welfare metric is given by:

$$SV(x) = E(x) + D(1+r_d) - B + G(x),$$
 (23)

where $D(1+r_d)$ is the book value of current deposits, and G(x) is the value of the net payoff to the government, defined by the recursive equation

$$G(x) = (1 - \Delta(x)) \left(\mathcal{T}(y') + \mathbb{E}[M(x, x')G(x')] \right) - \Delta(x) \left(\eta D(1 + r_d) + K' \right) \quad (24)$$

with $\Delta(x)$ denoting the default indicator at x. Equation (24) reads as follows: so long as the bank is solvent ($\Delta(x)=0$), taxes are collected, where

¹¹ For the use of enterprise value as a metric of efficiency in the context of dynamic models of nonfinancial firms see, for example, Gamba and Triantis (2008) and Bolton, Chen, and Wang (2011).

 $\mathbb{E}[M(x,x')G(x')]$ is the present discounted value of future tax proceeds. If the bank is insolvent ($\Delta(x)=1$), then the government incurs direct bankruptcy costs ηD , and injects new equity capital $K' = D_u - D'$.¹²

2. Bank Regulation

2.1 Capital requirement

In our model the capital ratio is the ratio of the book value of capital over the book value of loans. Basel II-type capital regulation establishes a lower bound, K_d , on the book value of equity, set by the regulator as a function of a bank's risk exposure at the beginning of the period. In particular, this requirement is a weighted average of risks associated with a bank's exposure of assets of different riskiness. Because a bank in our model has just one composite risky asset, we set the weight applied to loans equal to 100%. Thus, the required capital, K_d , is at least a proportion, k, of loans outstanding at the beginning of the period, L, or $K_d = kL$. This requirement is equivalent to constraining net worth to be positive ex ante. Given the definition of bank capital in Equation (6), under the capital requirement, a bank's feasible choice set is

$$\Theta(D) = \{ (L, B) | (1-k)L + B \ge D \}.$$
(25)

When we compare the feasible choice set under the collateral constraint in Equation (11) with the feasible set under the capital requirement, in general neither $\Gamma(D) \subset \Theta(D)$ nor $\Theta(D) \subset \Gamma(D)$ in a proper sense.

The Bellman equation for the equity value of a currently solvent bank under a capital requirement is given by Equation (18), the only difference being a feasible set $\Gamma(D') \cap \Theta(D')$ in place of $\Gamma(D')$, because the bank is forced to comply ex ante with the capital requirement. However, at the end of each period, when the credit shock on existing loans Z' and the new deposit D'are realized, a bank may still face default risk if the innovations of the state variables are particularly unfavorable.

2.2 Liquidity requirement

Current Basel III regulation introduces a mandatory *liquidity coverage ratio* as a defense against the potential onset of severe liquidity stress. According to this requirement, banks should hold a stock of high quality liquid assets such that the ratio of this stock over the predicted net cash outflows over a 30-day time period in the case of acute stress—as defined by the regulator—is not lower than a certain percentage threshold.

¹² Note that if the net payoff to the government is positive along a given path, the tax proceeds collected from a bank in the past are sufficient to cover the recapitalization of a new bank. Otherwise, the shortfall of the government will be covered by tax proceeds raised from other agents in the economy. In either case the government value metrics of Equation (24) captures the net cost of banks to the government. Equivalently, the welfare metric is the sum of enterprise value gross of bankruptcy costs, plus G(x), which is net of bankruptcy costs incurred by the government.

In our model, the stock of high quality liquid assets over the net cash outflows over a bank's planning period is given by the total cash available at the end of the period over the total net cash flow in the worst-case scenario for both credit and liquidity shocks. Formally, this liquidity coverage ratio should be not lower than a level ℓ defined by the regulator, or

$$\frac{\delta L + Z_d \pi(L) - \mathcal{T}(\mathbf{y}^{\min}) + B(1 + r_f)}{D(1 + r_d) - D_d} \ge \ell.$$
(26)

Hence, the feasible set for a bank complying with the liquidity requirement is

$$\Lambda(D) = \left\{ (L,B) \mid \frac{\delta L + \ell D_d + Z_d \pi(L)(1 - \tau^{\min})}{\ell(1 + r_d) - \tau^{\min} r_d} + B \frac{1 + r_f(1 - \tau^{\min})}{\ell(1 + r_d) - \tau^{\min} r_d} \ge D \right\}.$$
(27)

Thus, the liquidity ratio is the end-of-period total cash available in the worstcase scenario over the end-of-period net cash outflows due to a variation in deposits.

Figure 2 shows the constraints implied by the capital and the liquidity requirements, as well as the collateral constraint for a specific choice of parameters. It is apparent that when considered together, capital and liquidity constraints may create considerable restrictions on a bank's feasible choices.

2.3 Prompt corrective action (PCA)

An important objective of bank regulation is the minimization of losses of the deposit insurance fund. This is achieved by PCA policies, which force banks to

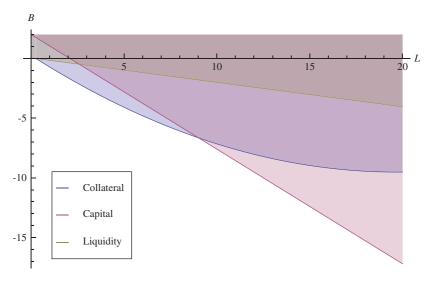


Figure 2

Comparison of constraints

This figure presents the three feasible regions of (L, B) defined by the collateral constraint, $\Gamma(D)$ in Equation (11), the capital requirement, $\Theta(D)$ from Equation (25), and by the liquidity requirement, $\Lambda(D)$ from Equation (27). The plot is based on the parameter values in Table 1, for a current D=2.

liquidate assets, suspend payouts contingent on prespecified observed levels of capitalization, or close a distressed bank if capitalization is lower than a given threshold. Correspondingly, we define a PCA rule contingent on observed ex post bank capital. Formally, ex post bank capital in period t (as opposed to K, which is the ex ante bank capital in period t), is

$$V = L + B - D + y - \mathcal{T}(y) = K + y - \mathcal{T}(y)$$

The regulator implements PCA according to the following:

Assumption 10 (PCA). If at time t the ex post bank capital satisfies the ex ante capital ratio, that is $V \ge kL$, no action is taken. If the ex-post bank capital is such that 0 < V < kL, the deposit insurer forces the distressed bank to restore capital in the current period by replenishing the shortfall kL - V and to satisfy the regulatory ratio in the next period. If the ex post bank capital is negative $(V \le 0)$, the bank is closed at time t and taken over by the deposit insurance agency.

The PCA thus establishes that banks with a positive ex post capital, but lower than satisfying regulatory ratio, are forced to finance the shortfall by liquidating assets, raising collateralized debt, suspending payouts, or issuing new equity. From Equation (12) we have

$$U = y - T(y) + K - K' - m(I) = V - m(I) - K'.$$

When V < kL, a bank is forced to finance the shortfall kL - V, as well as to set the capital for the next period to the required level so that $K' = V - m(I) - U \ge kL' + (kL - V)$. On the other hand, when the ex-post bank capital is negative, the closure rule applies: a bank is expropriated from shareholders and is transferred to the government. New capital $K' = D_u - D'$ is injected net of the positive value of the bank's capital, E(x) > 0. In both cases, the government agency does not incur bankruptcy costs ($\eta = 0$).

Note that the PCA actually implements a *contingent* enforcement of a capital requirement. When triggered, such a requirement is more stringent than the ex ante capital requirement for two reasons. First, the PCA implements a more restrictive rule on ex ante book capital contingent on certain (low) realizations of ex-post capital. Second, the risk of expropriation of shareholders based on the realization of negative ex-post capital imposes a higher shadow cost on the current capital requirement. For these reasons, we consider the PCA as a proper regulation in itself, so that we can compare the impact of a contingent capital requirement plus a closure rule, as implemented by the PCA just defined, with (noncontingent) capital requirements.¹³

¹³ In practice, however, PCA-type policies apply to banks that are already subject to other regulations, such as capital requirements. In the sequel, we will also consider the impact of the PCA when implemented together with capital and liquidity requirements.

For banks subject to the PCA, the Bellman equation of the solution of the bank's program when the bank is solvent (i.e., V_t is positive) is as in Equation (18). Under the PCA closure rule, the value of the net payoff to the government is defined by the recursive equation

$$G(x) = (1 - \Delta(x)) \left(\mathcal{T}(y') + \mathbb{E}[M(x, x')G(x')] \right) - \Delta(x) \left(K' - E(x) \right), \quad (28)$$

with $\Delta(x)$ denoting the indicator of the event V < 0 at x.

As before, the government is assumed to be able to finance any recapitalization shortfall of an individual bank with general tax proceeds. However, if $V \leq 0$ and collateralized debt is issued (B < 0), bond holders, old depositors, and the government are paid in full.¹⁴ In this case, the financing shortfall (net obligations minus available liquid funds) of the bank is $(1+r_d)D - (1+r_f)B + \mathcal{T}(y) - (D' + \pi(L)Z)$. A portion of loan portfolio is liquidated and the proceeds match (net of loan liquidation costs) the shortfall:

$$L - L' - m(L(1-\delta) - L') = (1+r_d)D - (1+r_f)B + \mathcal{T}(y) - (D' + \pi(L)Z).$$

By solving this equation with respect to L', a new level of loans, L^* , is determined, which is positive because the bank satisfies the collateral constraint. Clearly, in this reorganization procedure, an indirect cost is still incurred because of loan liquidation costs, $m(L(1-\delta)-L^*)$.

3. Regulations in a Simplified Version of the Model

To illustrate some trade-offs on bank optimal policies implied by capital and liquidity requirements under the assumption that banks are short lived, we collapse our model to three periods. Now t+1 is the decision date, t+2 is the final date, and the bank initial conditions are determined at t.

We make the following simplifying assumptions. The discount factor is deterministic, so $M(x_t, x_{t+1}) = \beta$. There are no taxes and no adjustment costs, and deposits are deterministic and constant $(D_t = D_{t+1} = D_{t+2} = D > 0)$, $\delta = 0$, $\beta \le (1+r_f)^{-1}$, and $r_d = r_f$. Furthermore, we assume a simple two-point credit shock distribution: Z^H with probability $p \in (0, 1)$, and Z_d otherwise, where Z_d is such that $Z_d = \frac{Z^L L_{t+1}}{\pi(L_{t+1})}$, with $Z^H > 0 \ge Z^L \ge -1$. Under these assumptions, the collateral constraint for $B_{t+1} < 0$, denoted with (C), the capital constraint,

$$L + \pi(L)Z_d + (1+r_f)B - (1+r_d)D - \mathcal{T}(y^{\min}) \ge m(-L(1-\delta)) - D_d,$$

the closure rule $V \leq 0$ gives

 $L + \pi(L)Z + (1 + r_f)B - (1 + r_d)D - \mathcal{T}(y) \le 0,$

¹⁴ This is because the collateral constraint in Equation (10) is

and the left-hand side of the second inequality is higher than the corresponding side of the first inequality. Therefore, all stakeholders can be paid by liquidating the assets.

denoted with (K), and the liquidity constraint, denoted with (L), are

$$B_{t+1} \ge \frac{r_f}{1+r_f} D - \frac{1+Z^L}{1+r_f} L_{t+1}, \tag{C}$$

$$B_{t+1} \ge D - (1-k)L_{t+1},$$
 (K)

$$B_{t+1} \ge \frac{\ell r_f}{1 + r_f} D - \frac{Z^L}{1 + r_f} L_{t+1}.$$
 (L)

Recall that by Equation (13), the cash flow to shareholders is $U_t = W_t + L_t - B_{t+1} - L_{t+1}$ if $U_t > 0$, and $U_t(1+\lambda)$ if $U_t < 0$, as the bank issues new equity at a cost $\lambda \ge 0$.

The bank chooses (L_{t+1}, B_{t+1}) to maximize

$$e_{t} + \beta \mathbb{E}_{t}[e_{t+1}] = (W_{t} + L_{t})(1 + \lambda) - (1 + \lambda - \beta p(1 + r_{f}))B_{t+1} - (1 + \lambda)L_{t+1} + \beta \left[p \left(Z^{H} \pi(L_{t+1}) - (1 + r_{f})D + L_{t+1} \right) + (1 - p) \max \left\{ 0, (1 + Z^{L})L_{t+1} + (1 + r_{f})B_{t+1} - (1 + r_{f})D \right\} \right].$$
(29)

Because $1+\lambda > \beta p(1+r_f)$, it is optimal to maximize debt ($B_{t+1} < 0$), because profits are increasing in debt in the good state, whereas in the bad state losses are bounded to be nonnegative by limited liability. This implies that at most one of the constraints (C), (K), and (L) will be binding.

The unregulated bank maximizes Equation (29) subject to constraint (C). Inserting (C) into Equation (29), the max $\{\cdot\}$ term in the third line of Equation (29) vanishes. Therefore, the optimal loan level L_{t+1}^c satisfies the (necessary and sufficient) first-order condition

$$\beta p Z^{H} \pi'(L_{t+1}^{c}) = 1 + \lambda - \beta p - (1 + \lambda - \beta p (1 + r_{f})) \frac{1 + Z^{L}}{1 + r_{f}}.$$
 (30)

Suppose now that the capital constraint (K) is tighter than (C); that is, (K) is binding. The third line of Equation (29) becomes $\max\{0, (1+Z^L-(1+r_f)(1-k))L_{t+1}\}$.

The optimal loan investment when (K) is binding, defined by L_{t+1}^k , satisfies

$$\beta p Z^{H} \pi'(L_{t+1}^{k}) = 1 + \lambda - \beta p - (1 + \lambda - \beta p (1 + r_{f}))(1 - k).$$
(31)

By comparing the right-hand sides of Equations (30) and (31), it is straightforward to verify that $L_{t+1}^k > L_{t+1}^c$ when $(1+Z^L) < (1+r_f)(1-k)$, owing to the strict concavity of function π .

Observe that the inequality $(1+Z^L) < (1+r_f)(1-k)$ holds for relatively low levels of k, but it is reversed for values of k close to one. Thus, there exists a threshold value \hat{k} such that $L_{t+1}^k < L_{t+1}^c$ for all $k > \hat{k}$. In other words, under a sufficiently mild capital constraint (or $k < \hat{k}$), lending is higher than in the unregulated case. Thus, when (K) is binding, depending on parameters, lending could be higher than in the unregulated case under mild capital requirements, even though borrowing is lower $(B_{t+1}^k > B_{t+1}^c)$ holds when constraint (K) is more stringent than (C)). This is because the capital requirement lowers the return of holding cash relative to the expected return on loan investment. In sum, there may exist parameter configurations such that the relationship between loans and capital requirements is inverted U shaped. Interestingly, this result may (but needs not) hold for any $\lambda \ge 0$.

Consider now the addition of a liquidity requirement to the capital requirement and suppose that the liquidity constraint (L) is tighter than (K) at the optimal choice L_{t+1}^k ; that is, (L) is binding. Replacing (L) in Equation (29), the max{·} term turns into max{0, $L_{t+1}+(r_f(\ell-1)-1)D$ }.

If at the optimal solution $L_{t+1} + (r_f(\ell-1)-1)D \le 0$, then L_{t+1}^{ℓ} satisfies

$$pZ^{H}\pi'(L_{t+1}^{\ell}) = r_f - (1-p)Z^{L}.$$
(32)

Otherwise, L_{t+1}^{ℓ} satisfies

$$pZ^{H}\pi'(L_{t+1}^{\ell}) = r_f - Z^L.$$
(33)

Comparing Equation (32) with Equation (30), it is easy to verify that the right-hand side of Equation (30) is always strictly lower than that of Equation (32). By strict concavity of the revenue function, this implies that $L_{t+1}^{\ell} < L_{t+1}^{k}$: the liquidity constraint unambiguously reduces lending relative to the bank subject to a (binding) mild capital constraint. Comparing Equation (30) with Equation (33), the same result is obtained if *p* is close to one. Thus, there may exist parameter configurations such that the liquidity constraint reduces lending relative to the capital constraint.

The conclusions of this simplified version of the model may, or may not, hold under complex dynamic trade-offs arising from the fully dynamic version of our model, to which we now turn.

4. The Impact of Bank Regulation

In this section we illustrate the results of the calibration and simulation of the model.

4.1 Calibration

Our calibration is based on three sets of parameters, summarized in Table 1. The first set comprises parameters of the credit shock and deposits process. We estimated the VAR in Equation (15) using U.S. yearly aggregate time series for the period 1983–2009 for the entire universe of banks included in the Federal Reserve Call Reports constructed by Corbae and D'Erasmo (2011). The shock process was proxied by the return on bank investments before taxes, given by the ratio of interest and noninterest revenues to total lagged assets. As can be seen in Table 1, the shock process exhibits high persistence and the correlation

κZ	annual persistence of the credit shock	0.88
$\frac{\sigma_Z}{Z}$	annual conditional SD of the credit shock	0.0139
Z	unconditional average of the credit shock	0.0717
κD	annual persistence of the log of deposits	0.98
$\frac{\sigma_D}{D}$	annual conditional SD of the log of deposits	0.0209
\overline{D}	unconditional average of deposits	\$2
ρ	correlation between log-deposit and credit shock	-0.85
β	time discount factor	0.95
γ ₁	constant price of risk parameter	3.22
γ2	time varying price of risk parameter	-15.30
r_f	annual rate on bonds	2.5%
r_d	annual rate on deposits	0%
τ^+	corporate tax rate for positive earnings	15%
τ-	corporate tax rate for negative earnings	0%
δ	annual percentage of reimbursed loan	20%
η	bankruptcy costs	0.10
λ	flotation cost for equity	0.06
α	return to scale for loan investment	0.90
m^+	unit price for loan investment	0.04
m^{-}	unit price for loan fire sales	0.05
k	percentage of loans for capital regulation	4%
l	liquidity coverage ratio	20%

Table 1Base case model parameters

with the process of (log) deposit is negative. Estimates of the autocorrelation process for (log) deposit produced estimates closed to unity, indicating the possibility that such process has a unit root. To guarantee convergence of the fixed point algorithm, we set this parameter equal to 0.98.

The second set of parameters is taken from previous research. The parameters of the stochastic process of the macroeconomic risk factors u, κ_u and σ_u are set equivalent, on an annual basis, to the quarterly values of 0.98 and 0.007 reported by Jones and Tuzel (2013). The parameters of the stochastic discount factor, $\gamma_1 = 3.22$ and $\gamma_2 = -15.30$, are also taken from Jones and Tuzel (2013). The annual discount factor β is 0.95, equal to that used by Zhu (2008) and Cooley and Quadrini (2001). The rate, r_f , is set to 2.5% and the deposit rate, r_d , is set to zero. These values are consistent with the average effective cost of funds documented by Corbae and D'Erasmo (2011). With regard to corporate taxation, recall that the tax function is defined by the marginal tax rates, τ^+ and τ^{-} , for positive and negative income, respectively. Because we do not explicitly consider dividend and capital gain taxation for shareholders, or interest taxation for depositors and bond holders, the two marginal rates for corporate taxes need to be considered net of the effect of personal taxes. For this reason, we choose τ^+ = 15%, which is close to the values determined by Graham (2000) for the marginal tax rate. The marginal tax rate for negative income is $\tau^{-}=0$ to allow for convexity in the corporate tax schedule.

Furthermore, the proportional bankruptcy cost is $\eta = 0.10$. This is a value close to the (structural) estimate of 0.104 based on data for U.S. nonfinancial firms found by Hennessy and Whited (2007). Because this estimate is based

on nonfinancial firms, it can be viewed as a lower bound for bankruptcy costs incurred in the financial sector. The annual percentage of reimbursed loan is 20%, so that the average maturity of outstanding loans is four years, in line with the assumption made by Van den Heuvel (2009). The underwriting cost for seasoned equity issuance is 6%, not far from the estimates provided by Altinkilic and Hansen (2000) and Hennessy and Whited (2005).

The revenue function from loan investment is $\pi(L) = L^{\alpha}$ as in Zhu (2008), and our base case value for α is set equal to 0.90, which is a value in line with that used in other studies. Lastly, we obtain $m^+=0.04$ and $m^-=0.05$ by matching two moments from empirical data. The first moment is the average ratio of bank credit over deposits, where bank credit includes loans and other financial investments. From our dataset, this ratio is 1.271. The second moment we match is bank's book leverage, defined as deposits plus other financing liabilities over loans and other financial investments. In the data, the average book leverage is 0.89. The corresponding unconditional moments from a Monte Carlo simulation of the model with the selected parameters are, respectively, 1.1153 and 0.9043. Hence, our calibration delivers per-unit loan liquidation costs higher than per-unit costs of loan extensions $(m^- > m^+)$.

The third set of parameters is based on regulatory prescriptions. These is the ratio of capital to risk-weighted assets and the liquidity coverage ratio. The benchmark capital ratio *k* is set equal to 4%, whereas the benchmark liquidity ratio is set equal to $\ell = 20\%$.

The relationships between the credit and liquidity shocks affecting the banking system, as well as the systematic (macroeconomic) risk factor and the idiosyncratic factor, are derived in Appendix B and illustrated in Figure 3. As expected, credit risk is positively correlated with the systematic risk factor, as credit quality and loan demand increase in an upturn, and decline in a downturn. On the other hand, liquidity risk, as captured by the dynamics of insured deposits, is mildly negatively correlated with the systematic risk factor. This pattern is consistent with an increase in savings in a downturn, as insured deposits are a component of savings, and with the reallocation of agents' portfolios towards safer assets. Lastly, the correlations between idiosyncratic risk and credit and liquidity risks are fairly small, slightly negative for the former, and almost null for the latter.

4.2 Bank policies along the business cycle

The correlations between optimal bank policies and the systematic (macroeconomic) risk factor, viewed as a proxy measure of the business cycle, are summarized in Figure 4 and Tables 2–4. Five cases are considered: unregulated banks, banks subject to capital requirements only, banks subject to both capital and liquidity requirements, banks subject to the PCA only, and bank subject to the PCA and capital requirements. Specifically, Figure 4 depicts lending and debt policies for a given set of states centered on the steady-state (unconditional)

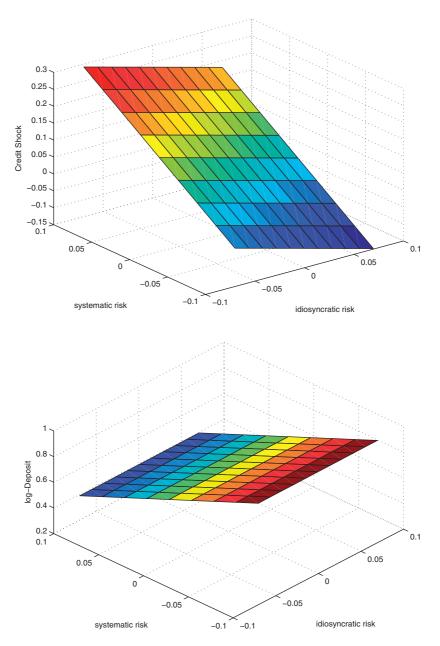


Figure 3

Credit shock and deposit against systematic and idiosyncratic risk

The values are from the numerical solution of the model using nine points for u and eleven points for v, based on the estimated parameter values in Appendix B.

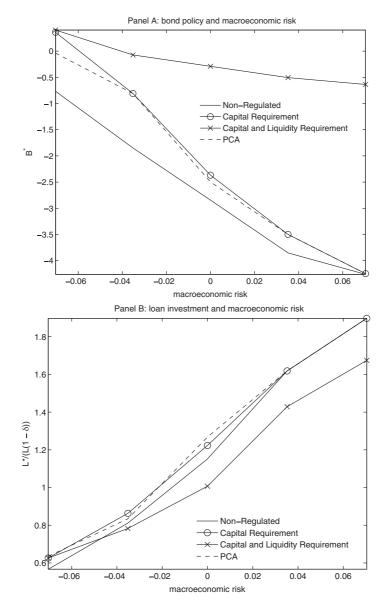
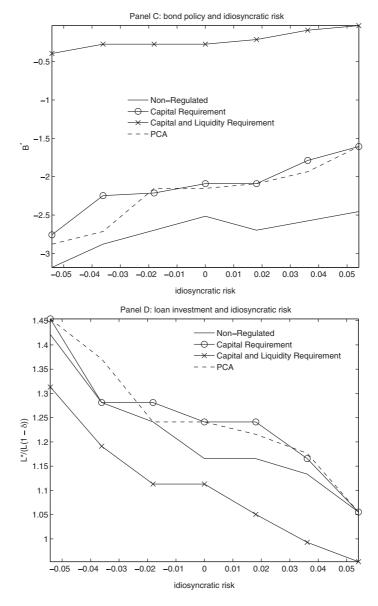


Figure 4 Bank's policy

This figure illustrates the impact of regulatory restrictions on the bank's policy related to loan investment represented by the ratio $L^*/L(1-\delta)$ and to short-term investment and financing with bonds, B^* , for the nonregulated case, for the cases with capital constraint, with both capital and liquidity constraints altogether, and the PCA case. These values are plotted against the macroeconomic risk factor, u, in the upper panels and the idiosyncratic risk factor, u, in the remaining panels, and are obtained assuming that the bank is currently at the steady state (so that the credit shock is 0.0717, and the deposits from the previous date are D=2, respectively), whereas B=0, and L=4.7 so that the current bank capital (right before making the decision) is K=2.7. The investment and financing policies are given by averaging out idiosyncratic risk when plotted against u and averaged across the systematic risk when plotted against v. These results are based on the numerical solution of the valuation problem in (18), as described in Appendix C, based on the parameter values in Table 1.





median values.¹⁵ Tables 2–4 are based on Monte Carlo simulation (the design of the simulation exercise is detailed in Appendix C). In these tables we report bank lending, capital ratios, and liquidity ratios for solvent banks sorted against quartiles of total risk (the sum of systematic and idiosyncratic shocks, u+v). In the top panel of each table the sorting of these variables is based on the whole sample. The influence of the business cycle is obtained by sorting variables conditional on the state of the economy being in a business cycle upturn (with u=0.0352), or in a downturn (with u=-0.0352).

4.2.1 Unregulated banks. As shown in Figure 4 and Table 2, lending and debt are positively correlated with the systematic shock. Recall that such a shock translates into a positive credit shock, Z, and a negative liquidity shock, because deposits are negatively correlated with the systematic shock. Thus, a positive systematic shock prompts banks to increase lending, but also increases their need of financing when deposits become relatively scarce, inducing them to increase debt as well. Thus, a positive correlation between lending, debt, and the systematic shock is a feature of banks' optimal policies *independently* of bank regulations.

As shown in Table 3, capital ratios are positively correlated with the systematic shock, owing to lower deposits in an upturn (deposits are a negative component of the ratio), whereas changes in loans and short-term debt almost offset each other.¹⁶ By contrast, as shown in Table 4, liquidity ratios are negatively correlated with the systematic shock, because in a downturn debt declines and deposits increase. The opposite holds in an upturn.

4.2.2 Capital requirements. Similarly to unregulated banks, banks under the base capital requirement exhibit a positive correlation between the systematic shock, lending, and debt (see Figure 4). However, banks invest more in loans and choose less debt than their unregulated counterparts for all realizations of the systematic shock. This implies that banks subject to a capital requirement that we term "mild" find it optimal to increase loans at a rate proportionally higher than the capital ratio coefficient (see Equation (25)), rather than by reducing lending. In essence, a mild capital requirement reduces the rate of return on short-term debt relative to the expected returns on loans, prompting a higher investment in loans. In turn, higher revenues generated by higher lending are employed in building capital. Interestingly, in a downturn banks subject to a mild capital requirement reduce lending less than that of unregulated banks.

¹⁵ The analysis is centered at the steady states for both deposits (D=2) and credit shock (Z=0.0717), while choosing B=0 to avoid the impact of current liquidity, and L=4.7, which is close to the unconditional median of L for several versions of the model. As a result, bank's capital is K=2.7.

¹⁶ Note that (book) capital ratios may be negative for some realizations of systematic and idiosyncratic shocks. Because there is no restriction on book capital and, as is standard in the literature, the (concave) loan function has the book value of loans as an input, in the presence of debt a bank can be operating as long as the market value of its capital is positive, even though its book capital can be negative.

Unconditional				
e^{u+v}	0.99	1.01	1.02	1.06
Unregulated	1.12	1.01	0.87	0.73
Capital	1.18	1.13	1.00	0.91
Cap + Liq	0.92	0.81	0.76	0.63
PCA	1.23	1.13	1.03	0.86
PCA + Cap	1.18	1.13	1.01	0.87
Upturn				
e^{u+v}	1.02	1.04	1.05	1.09
Unregulated	2.14	1.85	1.77	1.53
Capital	2.07	2.03	1.83	1.68
Cap + Liq	1.50	1.38	1.31	0.99
PCA	2.07	2.02	1.83	1.67
PCA + Cap	2.07	2.03	1.83	1.68
Downturn				
e^{u+v}	0.95	0.97	0.98	1.02
Unregulated	-0.04	-0.08	-0.08	-0.07
Capital	0.06	-0.03	-0.06	-0.07
Cap + Liq	0.07	-0.03	-0.02	-0.03
PCA	0.06	-0.05	-0.08	-0.09
PCA + Cap	0.06	-0.03	-0.05	-0.06

Table 2
Loan investment policy

This table shows the simulated ratios $L^*/((1-\delta)L)$, where L^* is the optimal solution for a solvent bank, sorted against quartiles of total risk, e^{u+v} , under the unregulated, the capital requirement, the capital and liquidity requirement cases, the PCA case, and the one with PCA and capital requirement. We report the values from the total sample (top panel), the values conditional on the economy being in an upturn, when the systematic risk u=0.0352 (middle panel), or in a downturn, when u=-0.0352 (bottom panel). These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the economies of the time-series averages of the cross-sectional sortings.

This implies that risk-based capital regulation does not necessarily amplify the contraction of lending in a downturn.

These mechanisms are reflected in the evolution of the capital and liquidity ratios along the cycle. A mild capital requirement encourages banks to build-up capital buffers in upturns to reduce the risk of costly loan liquidations in downturns: this is witnessed by the lower correlation (to the point of becoming almost zero) between capital ratios and the systematic shock relative to unregulated banks (see Table 3). On the other hand (see Table 4), under a mild capital requirement, liquidity ratios and the systematic shock become more negatively correlated relative to unregulated banks. This occurs because in a downturn banks use retained earnings and the financial resources freed by the reduction in lending to strengthen their liquidity position. In other words, a mild capital requirement contributes to strengthen banks' liquidity position in a downturn.

4.2.3 Liquidity requirements. The addition of a liquidity requirement to a capital requirement changes bank optimal policies significantly. As shown in Figure 4 and Table 2, banks' lending and debt shrink for every realization of

Table 3

Capital ratios				
Unconditional				
e^{u+v}	0.99	1.01	1.02	1.06
Unregulated	-5.75	-3.30	-1.10	-1.79
Capital	0.11	0.15	0.15	0.14
Cap and Liq	0.33	0.36	0.34	0.32
PCA	0.06	0.04	0.02	0.01
PCA + Cap	0.11	0.16	0.15	0.15
Upturn				
e^{u+v}	1.02	1.04	1.05	1.09
Unregulated	0.18	0.14	0.12	0.06
Capital	0.19	0.18	0.15	0.13
Cap and Liq	0.62	0.60	0.59	0.53
PCA	0.19	0.19	0.15	0.13
PCA + Cap	0.19	0.18	0.15	0.13
Downturn				
e^{u+v}	0.95	0.97	0.98	1.02
Unregulated	-29.00	-23.49	-13.04	-14.29
Capital	0.06	0.20	0.19	0.19
Cap and Liq	0.07	0.21	0.20	0.19
PCA	-0.07	-0.14	-0.17	-0.21
PCA + Cap	0.06	0.20	0.19	0.19

This table shows the simulated capital ratios (i.e., bank capital over loans, or $K^*/L^* = (L^* + B^* - D')/L^*$, where (L^*, B^*) is the optimal solution for a solvent bank and D' is the new possible level of deposits), sorted against quartiles of total risk, e^{u+v} , under the unregulated, the capital requirement, the capital and liquidity requirement cases, the PCA case, and the one with PCA and capital requirement. We report the values from the total sample (top panel), the values conditional on the economy being in an upturn, when the systematic risk u = 0.0352 (middle panel), or in a downturn, when u = -0.0352 (bottom panel). These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the economies of the time-series averages of the cross-sectional sortings.

the systematic shock, with the reduction in debt being the most dramatic. Thus, the liquidity requirement turns out to be far more restrictive than the capital requirement, forcing banks to reduce both debt and lending. Moreover, relative to the case of banks subject to capital regulation only, the correlation between lending and the systematic shock is drastically reduced.

The dominant tightness of the liquidity requirement is also reflected in the evolution of capital ratios along the business cycle. As shown in Table 3, capital ratios become inflated, being pushed up by a relatively large net bond holding (the numerator of the ratio) and a lower investment in loans (the denominator of the ratio). Note that the mechanism driving this result is totally different from that induced by capital regulation: in that case, the capital ratio is pushed up by retained earnings generated by higher revenues from lending, while in this case, the capital ratio is mainly pushed up by a significant reduction of lending. Therefore, under a liquidity requirement the capital ratio and the systematic shock become significantly more positively correlated. This increased correlation is the result of banks being forced to reduce lending significantly in an upturn. In a downturn, however, capital ratios

Elquiuity ratios				
Unconditional				
e^{u+v}	0.99	1.01	1.02	1.06
Unregulated	-535.32	-270.79	-182.18	-129.10
Capital	-534.41	-270.23	-181.53	-128.61
Cap and Liq	25.10	8.99	9.05	6.22
PCA	-535.18	-270.67	-181.97	-128.52
PCA + Cap	-534.41	-270.22	-181.51	-128.22
Upturn				
e^{u+v}	1.02	1.04	1.05	1.09
Unregulated	-26.32	-24.45	-23.35	-21.82
Capital	-26.56	-25.43	-24.38	-23.01
Cap and Liq	0.91	0.75	0.91	0.70
PCA	-26.77	-25.54	-24.45	-22.86
PCA + Cap	-26.56	-25.42	-24.36	-22.88
Downturn				
e^{u+v}	0.95	0.97	0.98	1.02
Unregulated	-0.26	-0.12	-0.05	-0.01
Capital	2.59	3.01	3.20	3.34
Cap and Liq	3.04	3.40	3.42	3.52
PCA	2.53	2.98	3.15	3.31
PCA + Cap	2.58	3.01	3.21	3.39

Table 4 Liquidity ratios

This table shows the simulated liquidity ratios (i.e., end-of-period total cash available in the worst-case scenario over the end-of-period net cash outflows due to a variation in deposits, or $(\delta L^* + \pi (L^*)Z_d - T(y^{\min}) + B^*(1 + r_f))/(D'(1+r_d) - D_d)$, where (L^*, B^*) is the optimal solution for a solvent bank and D' is the new possible level of deposits, sorted against quartiles of total risk, e^{u+v} , under the unregulated, the capital requirement, the capital and liquidity requirement cases, the PCA case, and the one with PCA and capital requirement. We report the values from the total sample (top panel), the values conditional on the economy being in an upturn, when the systematic risk u = 0.0352 (middle panel), or in a downturn, when u = -0.0352 (bottom panel). These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the economies of the time-series averages of the cross-sectional sortings.

are not significantly different from those attained by banks subject only to capital regulation.

As shown in Table 4, liquidity ratios are significantly higher than the prescribed level ($\ell = 20\%$), because the (shadow) cost associated with the liquidity constraint forces banks to hold precautionary cash to avoid hitting that constraint. On the other hand, liquidity ratios and systematic shocks are less negatively correlated, as witnessed by a comparison of the values under an upturn and a downturn. As a result, in a downturn the increase in liquidity holdings does not lead to liquidity ratios significantly different from those attained by banks subject to capital regulation only.

4.2.4 PCA. Under the PCA, the correlations between lending, debt, capital, and liquidity ratios are similar to those under capital regulation. However, as shown in Table 3, the correlation of the capital ratio with the systematic shock is higher than that under capital regulation, primarily owing to capital ratios significantly lower in downturns. The lower capital ratios under the PCA in

a downturn indicate that banks will implement a lower reduction in lending, while keeping their options open to either liquidate loans or issue equity in the event that the realization of current earnings is unfavorable. In essence, in a downturn the PCA appears to provide banks some flexibility, which is unavailable under an (unconditional) ex ante capital requirement. In the next section, we will show that the closure rule embedded in the PCA limits banks' incentives to abuse such flexibility.

4.2.5 Summary. Our analysis of banks' optimal policies along the business cycle delivers two results. First, relative to unregulated banks, mild capital requirements and the PCA reduce the correlation between lending, debt, and capital ratio and macroeconomic shock, and makes the liquidity ratio more negatively correlated with the macroeconomic risk, relative to unregulated banks. Specifically, in an upturn banks increase lending at a rate consistent with the buildup of capital buffers through retained earnings generated by higher lending revenues, whereas in a downturn they reduce debt by building up liquidity buffers. Perhaps not surprisingly, these results differ from those obtained in static or semistatic models that do not allow banks to issue equity or debt and to manage retained earnings. For example, procyclicality is enhanced by capital requirements in the model of Repullo and Suarez (2013), who consider short-lived banks that do not manage retained earnings, and are not allowed to issue either debt or equity.

Second, the addition of liquidity requirements to capital requirements reduces the procyclicality of lending and debt but also increases the procyclicality of capital ratios. Yet capital buffers in downturns are not significantly different from those resulting from banks subject only to capital regulation. Thus, the reduction in lending procyclicality is skewed toward upturns, significantly hampering lending.

4.3 Bank policies, efficiency, and welfare in the steady state

We now turn to the analysis of bank optimal policies and the metrics of efficiency and welfare in the steady state obtained through Monte Carlo simulation of the numerical solution of the bank's optimal program (see Appendix C for details). Table 5 presents statistics of policies, assets and liabilities, welfare and efficiency metrics, and default frequency, when banks are not regulated, when they are subject to capital requirements only, and when they are subject to both capital and liquidity requirements. Table 6 presents a comparison of the same statistics for banks under the PCA, and for banks subject to the PCA superimposed on capital and liquidity requirements. In Table 7 we report the same statistics under perturbed parameters of underwriting costs, loan liquidation costs, and the degree of bank's maturity transformation.

4.3.1 Capital requirements. Compared with the unregulated case, Table 5 shows that banks operating under the base case capital requirement (k=4%)

Table 5 The impact of bank regulation

	Unreg.	Capital		Cap	oital and Liqui	dity
		k=4%	k=12%	k = 4% $\ell = 20\%$	k = 12% $\ell = 20\%$	k = 4% $\ell = 50\%$
Loans (book)	4.41	5.08	4.96	3.71	3.75	3.71
Net bond holdings (book)	-2.75	-2.30	-2.05	0.34	0.32	0.38
Bank capital (book)	-0.32	0.80	0.92	2.07	2.09	2.12
Equity (mkt)	6.97	7.32	7.36	7.65	7.66	7.69
Deposits (mkt)	1.89	1.89	1.89	1.89	1.89	1.89
Enterprise value (mkt)	11.70	11.61	11.40	9.29	9.33	9.29
Government value (mkt)	0.82	0.97	0.97	0.90	0.90	0.91
Social value (mkt)	12.52	12.58	12.37	10.19	10.23	10.19
Default (%)	1.30	0.00	0.00	0.00	0.00	0.00

The table presents different dimensions of the bank, based either on book or on market values. The columns represent different choices of parameters: the "Unregulated" case is obtained with the parameters in Table 1. The case with capital constraint ("Capital") has either k = 4% or k = 12%. The case with both capital and liquidity restrictions ("Capital & Liquidity") is obtained for the base case parameters (k=4% and k=20%), and two alternative combinations, with k=12% and $\ell=20\%$, and with k=4% and $\ell=50\%$, respectively. These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the simulated economies of the time-series averages of the cross-sectional averages (computed on nondefaulted instances) of the different metrics.

Table 6Prompt corrective action

	Unreg.	PCA	Cap.	PCA+ Cap.	Cap.&Liq.	PCA+ Cap.&Liq.
Loan (book)	4.41	5.12	5.08	5.03	3.71	3.72
Net bond holdings (book)	-2.75	-2.38	-2.30	-2.25	0.34	0.34
Bank capital (book)	-0.32	0.77	0.80	0.80	2.07	2.07
Equity (mkt)	6.97	7.46	7.32	7.30	7.65	7.65
Deposits (mkt)	1.89	1.88	1.89	1.89	1.89	1.89
Enterprise value (mkt)	11.70	11.81	11.61	11.53	9.29	9.30
Government value (mkt)	0.82	0.97	0.97	0.98	0.90	0.91
Social value (mkt)	12.52	12.78	12.58	12.50	10.19	10.20
Default (%)	1.30	3.71	0.00	0.00	0.00	0.00
PCA frequency (%)	-	0.27	-	0.02	-	0

The table presents different dimensions of the bank, based either on book or on market values. The columns offer a comparison among the three cases (unregulated bank, capital requirement, and capital plus liquidity requirement) without and with the Prompt corrective action (PCA). These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the simulated economies of the time-series averages of the cross-sectional averages (computed on nondefaulted instances) of the different metrics.

lend more and have less debt. Remarkably, the steady-state percent increase in lending relative to the unregulated case is a significant 15%. Because deposits are not a control variable and follow the same exogenous process of the unregulated case, the bank can fund these additional loans by reducing payouts and increasing retained earnings and equity issuance. Specifically, from Equations (12) and (13), given the choice of L_{t+1} and B_{t+1} , more earnings are retained from W_t , or shares are issued (incurring underwriting costs) if U_t is negative.

As a result of these optimal policies, banks also hold a higher capital ratio than that prescribed by regulation. This is because the positive shadow price of

	Unreg.	base	$\lambda = 0$	$\lambda = .2$	$m^{-}=.08$	$\delta = .1$
Capital						
Loans (book)	4.41	5.08	5.13	4.98	5.09	7.38
Net bond holdings (book)	-2.75	-2.30	-2.32	-2.24	-2.31	-2.98
Bank capital (book)	-0.32	0.80	0.83	0.75	0.80	2.41
Equity (mkt)	6.97	7.32	7.35	7.22	7.29	10.30
Deposits (mkt)	1.89	1.89	1.89	1.89	1.89	1.89
Enterprise value (mkt)	11.70	11.61	11.65	11.44	11.57	15.26
Government value (mkt)	0.82	0.97	0.99	0.95	0.97	1.37
Social value (mkt)	12.52	12.58	12.64	12.40	12.55	16.63
Capital and liquidity						
Loans (book)	4.41	3.71	3.85	3.57	3.69	5.64
Net bond holdings (book)	-2.75	0.34	0.31	0.38	0.35	0.64
Bank capital (book)	-0.32	2.07	2.18	1.97	2.06	4.30
Equity (mkt)	6.97	7.65	7.80	7.49	7.64	10.86
Deposits (mkt)	1.89	1.89	1.89	1.89	1.89	1.89
Enterprise value (mkt)	11.70	9.29	9.47	9.09	9.27	12.20
Government value (mkt)	0.82	0.90	0.93	0.87	0.90	1.34
Social value (mkt)	12.52	10.19	10.40	9.96	10.17	13.54

 Table 7

 The role of equity issuance costs, adjustment costs and maturity transformation

The table shows two panels: on top the case of a bank with capital requirement and at the bottom the case of a bank subject to both capital and liquidity restrictions. The table presents different dimensions of the bank, based either on book or on market values. The columns represent different choices of parameters: the column denoted "base" is the base case, with the parameters in Table 1. The others are obtained by changing only the parameter used to denominate the column (e.g., in " λ =0" all the parameters are at the base case value, but λ , which is set to zero). These results are based on the numerical solution of the valuation problem in Equation (18) and the simulation of the optimal solution, as described in Appendix C, based on the parameter values in Table 1. The table presents the averages across the simulated economies of the time-series averages of the cross-sectional averages (computed on nondefaulted instances) of the different metrics.

the capital constraint forces banks to manage their earnings and investments so as to maintain a capital buffer that minimizes the risk that the constraint is hit. In such an event, it would become too expensive to either liquidate loans or inject new equity capital to comply with the regulatory restriction.¹⁷ Importantly, capital regulation results in a bank with a lower probability of default than in the unregulated case. Thus, a capital requirement is unambiguously successful in abating default risk under deposit insurance.

With regard to the efficiency and welfare metrics, a mild capital requirement results in a small decrease in banks' enterprise value (about 1%), which is offset by an increase in government value. The higher government value stems from higher tax receipts accruing from a larger taxable profit base, as well as from a lower probability of bank default, which reduces expected bailout costs. As a result, the welfare metrics is larger than that of the unregulated case.

However, the benefits of capital regulation can turn into welfare-reducing costs if such regulation becomes too stringent. An increase in the capital requirement (from k=4% to k=12%) results in reductions of lending and debt, as well as a reduction in efficiency and in welfare metrics. Recall that

¹⁷ These findings reflect the well-known result that constraints may not be binding on equilibrium paths (see, e.g., Ayagari 1995), and are consistent with the empirical evidence presented by Flannery (2005) and Flannery and Kasturi (2008).

banks satisfy a mild capital requirement by an increase in loans financed with a combination of debt and retained earnings. But when this requirement becomes too stringent, such a strategy becomes too costly. In such a case, payouts need to be significantly reduced, because either raising new equity capital generates equity issuance costs or reducing investment in unfavorable states of nature creates loan liquidation costs. These costs compel banks to reduce both lending and debt. Thus, there exists an inverted U-shaped relationship between lending and welfare associated with capital requirements. This further suggests the existence of optimal levels of regulatory capital as a function of banks' characteristics. In other words, under a mild capital requirement, banks optimally choose to increase lending so as to generate higher revenues supporting the building up of capital; if capital requirements are too high, however, banks find it optimal to satisfy them by reducing lending. This latter reduction also impacts negatively on welfare, as it reduces both the enterprise and government values of bank activities.

4.3.2 Liquidity requirements. When liquidity requirements are added to capital requirements, Table 5 shows that lending contracts dramatically relative to the bank subject only to the base capital requirement (by about 26%). The efficiency and welfare metrics declines significantly as well (by about 20%). As noted earlier, the liquidity requirement generates overbloated banks' book capital ratios. Such high ratios may be viewed as an indication of safe, but very inefficient, banks.

Furthermore, an increase in the capital requirement (from k = 4% to k = 12%) for the bank already subject to a liquidity requirement ($\ell = 20\%$), implies only small positive changes in lending and the efficiency and welfare metrics. Similarly, an increase in the liquidity requirement (from $\ell = 20\%$ to $\ell = 50\%$, with constant k = 4%) implies relatively small changes in lending, efficiency, and welfare. These results are due to the significant stringency of the liquidity requirement, which makes banks' optimal policies relatively insensitive to changes in capital requirements.

4.3.3 PCA. As shown in Table 6, the PCA prompts banks to increase lending relative to the unregulated case, as in the case of banks subject to capital regulation only. Importantly, however, the PCA also achieves higher lending, capital, and higher levels of the efficiency and welfare relative to banks subject only to a capital requirement, even though default (in the form of bank closure) is more frequent. Notably, our calibration implies that immediate capital restoration when 0 < V < kL is triggered only 0.27% of the times, so banks rarely incur this additional burden. This is because the PCA generates a shadow cost of violation large enough to prompt banks to choose policies that minimize the probability of these ex post violations. In essence, the PCA de facto implements a contingent transfer of control of banks from the shareholders to the deposit insurance authority that allows shareholders to get the upside

potential of investment, while giving the controlling authority a way to mitigate the welfare costs of liquidations and bailouts.

The superiority of the PCA over (noncontingent) capital and liquidity requirements stems in part from the resolution of the difficulties introduced by the absence of contingencies in deposit payments due to deposit insurance. In setups similar to ours, when demandable deposits are either fully contingent on the realization of the states, as in De Nicolò (1996), or when contingencies are introduced, allowing deposit runs, as in Allen and Gale (1998), an optimal banking allocation is achieved. Deposit insurance eliminates state contingency, and noncontingent capital and liquidity requirements do not replace the lack of contingencies of deposit payments. By contrast, the PCA is a state-contingent intervention scheme that substitutes for the lack of contingencies in demandable deposits, with these contingencies being induced now by a regulator acting as a representative of depositor. Under deposit insurance, state contingencies are moved to states of the world in which there is still equity value remaining.

It is interesting to assess the impact of the PCA depending on whether a bank is hit by a systematic or idiosyncratic shock. In the sample generated by our simulation, we find that the PCA is never triggered for any realization of the idiosyncratic shock when the systematic shock is positive. Moreover, conditional on a negative systematic shock, when the idiosyncratic shock is positive, the PCA is triggered with a low frequency (0.08%), whereas it occurs more frequently when such a shock is negative (0.19%). Therefore, the PCA is triggered differently according to whether shocks are systematic or idiosyncratic: bank closures and restructuring occur more often in the case of an adverse systematic shock, whereas forced recapitalizations and restructuring of payouts are more frequent in the case of an adverse idiosyncratic shock.

Finally, when the PCA is introduced in addition to banks subject to capital requirements, banks are forced to hold a capital ratio higher than k in all states, and this requirement is made more demanding by the PCA when V falls short kL. Relative to the case of capital requirement only, the addition of the PCA results in small reductions in lending, efficiency, and welfare metrics. Moreover, the marginal effect of PCA is negligible when applied to banks that are already subject to capital and liquidity requirements, owing primarily to the dominant stringency of liquidity requirements, which nullify the benefits of the PCA.

4.3.4 The role of issuance costs, loan liquidation costs, and the degree of maturity transformation. Here, we examine the impact of capital and liquidity requirements under different parameters of underwriting costs, loan liquidation costs, and the degree of bank's maturity transformation. In Table 7 we consider: no issuance costs, as well as an increase of λ from the benchmark value 0.06 to 0.2, an increase of loan liquidation costs, m^- , from 0.05 to 0.08, and a reduction of δ , the parameter gauging maturity transformation, from 20% to 10%, indicating a longer loan maturity (from 4 years to 9 years).

To what extent do underwriting costs contribute to determine the inverted U-shaped relationship between capital requirements, lending, and welfare? With no issuance costs, Table 7 shows that the inverted U-shaped relationship between lending, welfare, and capital requirements is strengthened. This is perhaps not surprising, because banks can cope with distress at a lower cost and find it optimal to increase lending even under higher levels of capital requirements. On the other hand, increasing issuance costs relative to the benchmark generates a decline in lending, enterprise, and social values, but this decline is relatively small. Note that these results hold for banks subject to capital requirements. Thus, the role of issuance costs in determining the costs of more stringent capital requirements appears relatively less important than the management of retained earnings.¹⁸

To what extent do different levels of loan liquidation costs change the impact of capital and liquidity requirements? When we increase the relevant parameter (m^-) in our simulation, lending, enterprise, and social values do not change significantly, relative to the base case. This result reveals again the key role of retaining earnings in supporting bank optimal choices: when facing higher loan liquidation costs, a bank would respond by increasing lending and retained earnings, with the latter increase aimed at minimizing the probability of incurring large loan liquidation costs in the event of distress. However, the addition of liquidity requirements to capital requirements still results in lower lending and a worsening of the efficiency and welfare metrics, as in all previous simulations. Therefore, the benefits of mild capital requirements may be even more important when loan liquidation costs are high.¹⁹

Lastly, the role of liquidity requirements in hampering the maturity transformation function of banks is starkly illustrated by the case in which banks have a longer loan maturity. Under capital requirements only, banks with a larger maturity mismatch undertake a more intense maturity transformation, as witnessed by higher levels of lending relative to banks with a milder maturity mismatch. When liquidity requirements are added to capital requirements, however, the reduction in lending, efficiency, and welfare is significantly greater than that witnessed by banks whose loan maturity is shorter under capital requirements only. Again, liquidity requirements are the more detrimental to

¹⁸ We run simulations treating equity issuance costs as undervaluation costs. In this case, although underpricing of newly issued equity affects current shareholders, it benefits new shareholders because they can buy a share in the bank's capital for a lower price. Therefore, these costs are not deadweight costs but just a wealth transfer from old to new shareholders, and are added to the welfare function. The qualitative results we obtain are essentially the same as those just presented.

¹⁹ As a robustness check, we considered loan liquidation costs as fire sales costs, since these costs have been identified as one of the key sources of systemic risk in the financial crisis of 2007–2009 (see, e.g., Kashyap, Brener, and Goodhart 2011). The welfare criterion now includes these costs, because fire sales affect negatively current shareholders but benefit investors who can buy assets at low fire sales prices. Although all other statistics remain unchanged, the social values are higher than those obtained in Table 5, but still hump shaped.

lending, efficiency, and welfare, when a banks' transformation of short-term liabilities into longer-term assets is more intense.

4.3.5 Summary. Mild capital requirements induce banks to increase lending, resulting in higher welfare relatively to unregulated banks, but these welfare gains are destroyed when requirements become too strict. This result is consistent with the finding of relatively high welfare costs associated with capital regulation by Van den Heuvel (2008). The resulting inverted U-shaped relationship between lending, welfare, and the level of capital requirements is also robust to different levels of underwriting costs and loan liquidation costs.

When liquidity requirements are added to capital requirements, they undo the benefits of mild capital requirements, because they prompt significant reductions in lending, efficiency, and welfare. In essence, liquidity requirements constrain banks' maturity transformation function, forcing them to underinvest in lending and overinvest in unproductive liquidity buffers.

Importantly, the PCA as a contingent resolution procedure dominates (unconditional) capital and liquidity requirements in terms of lending, efficiency, and welfare, because they provide stronger incentives for banks to manage risk relative to requirements set ex ante. This is accomplished by introducing contingencies based on observed equity, which effectively replace those contingencies in deposit payments that might improve bank efficiency and welfare, but that are ruled out by deposit insurance.

5. Concluding Remarks

In this paper we assess the impact of microprudential regulatory restrictions in a dynamic model of banks under deposit insurance that are exposed to credit and liquidity risks arising from systematic and idiosyncratic shocks, that undertake maturity transformation, that invest in risky loans, that issue secured debt and costly equity, and that may face financial distress. We found that capital requirements do not appear to increase lending procyclicality and give banks incentives to accumulate liquidity buffers in a downturn. In the steady state, we uncovered an inverted U-shaped relationship between bank lending, welfare, and regulatory capital ratios. By contrast, liquidity requirements significantly reduce lending, bank efficiency, and welfare. Importantly, the implementation of contingent capital requirements with a bank closure rule embedded in the PCA dominates both noncontingent capital and liquidity requirements in terms of lending, bank efficiency, and welfare.

Overall, these results support the argument by Admati et al. (2011) that capital requirements can be a substitute for liquidity requirements. Yet the results do not support proposals of sharp increases in the stringency of capital requirements. Rather, the dominance of the PCA over noncontingent regulatory prescriptions supports the desirability of recent proposals to introduce contingencies in the regulation of capital structure, such as those advanced in the pioneering work

by Flannery (2005, 2009), and more recently by Hart and Zingales (2011). Introducing resolution procedures with appropriate contingencies related to observed levels of capital, such as the PCA, might be a necessary step in moving toward optimal bank regulation.

Several extensions of our model seem worth pursuing in future work. First, note that in our model bank risk choices arise from the dependence of the volatility of cash flows on the level of lending, owing to the concavity of the loan revenue function. A risk-shifting problem would arise if equity holders decided to liquidate loan and distribute dividends, appropriating value from debt holders and depositors. However, the collateral constraint prevents such a behavior. Our setup therefore differs from those analyzed by Blum (1999) and Calem and Rob (1999), in which a bank makes a choice of a loan revenue distribution. Incentives for risk shifting might be induced by capital requirements when banks are poorly capitalized and the costs of issuing equity are too high or prohibitive, leading banks to "gamble for resurrection." For example, in Calem and Rob (1999) dynamic (infinite-horizon) model, bank risk taking increases if capital requirements are sufficiently high. Yet in their model equity issuance is ruled out and the size of a bank is fixed, so that banks cannot liquidate assets. In a finite-horizon setting, Calomiris, Heider, and Horeova (2012) show examples in which liquidity requirements might be a substitute for capital requirements. However, this occurs because there is an exogenously given choice of default in the final period. In this case, a positive bond investment (as a "liquid" component of capital) that could be used to preserve the (continuation) value of a bank is ruled out. Extending our model by allowing banks to choose a loan revenue distribution might be useful to assess the robustness of the foregoing conclusions. In any event, a contingent resolution policy, such as the PCA, would likely eradicate at the source the potential risk-shifting problems pointed out by these contributions.

Second, it might be interesting to explore the role of market-based capital requirements, as our valuation framework makes it feasible to clearly distinguish book from market values of equity in equilibrium. Third, our model does not capture endogenous liquidity runs, because the high realization of deposit withdrawals are exogenous. Thus, endogenous liquidity runs and banks that actively seek out liquidity are ruled out. Extending our model to include such features might make it feasible to address the issue raised by De Nicolò, Favara, and Ratnoski (2012), regarding the extent to which regulations such as capital and liquidity requirements may be complements or substitutes.

Appendix A. Properties of the Unregulated Bank Program

Compactness of the feasible set of the bank can be shown as follows. Given the strict concavity of $\pi(L)$, there exists a level L_u such that $\pi(L_u)Z_u - rL_u = 0$, where r (which can be either r_f or r_d) is the cost of capital of the marginal dollar raised either through deposits or short-term

(A1)

financing.²⁰ Thus, any investment $L > L_u$ would be unprofitable. This establishes an upper bound on the feasible set of L, given by $[0, L_u]$ for some L_u . With an upper bound on L, and because the stochastic process D has compact support, the collateral constraint sets a lower bound B_d (i.e., an upper bound on bond issuance). Specifically, this is obtained by putting D_d in place of D_t and L_u in place of L_t in Equation (10).

Lastly, an upper bound on B can be obtained assuming that the proceeds from risk-free investments made by the bank are taxed at a higher rate than the personal tax rate and that floatation costs are positive. Specifically, assume that the current deposits D are all invested in short-term bonds, B, with no investments in loans. To further increase the investment in bonds of one dollar, the bank must raise equity capital. A shareholder thus incurs a cost $1+\lambda$, where λ is the floatation cost. This additional dollar is invested at the rate r_f , so that at the end of the year, the proceeds of this investment that can be distributed are $(1+r_f(1-\tau^+))$. Alternatively, the shareholder can invest $1+\lambda$ in a risk-free bond, obtaining $(1+\lambda)(1+r_f)$. Because $\tau^+ \ge 0$ and $\lambda \ge 0$, then $(1+\lambda)(1+r_f) \ge (1+r_f(1-\tau^+))$, there is no incentive of the bank to have a cash balance larger than D as long as either λ or τ^+ are strictly positive. The foregoing argument is made for simplicity. If the shareholders are taxed on their investment proceeds at a rate τ_p , they obtain $(1+\lambda)(1+r_f(1-\tau_p))$ from their investment in the risk-free asset. If $\tau_p \leq \tau^+$, then $(1+\lambda)(1+r_f(1-\tau_p)) > (1+r_f(1-\tau^+))$, and the bank has no incentive to increase the investment in risk-free bonds beyond D. Moreover, if floatation costs associated with equity issuance are strictly increasing in the amount issued, no assumption about differential tax rates are needed to establish an upper bound on B. In conclusion, the feasible set of the bank can be assumed to be $[0, L_u] \times [B_d, B_u].$

Furthermore, standard arguments establish the existence of a unique value function E(x)= E(L, B, D, u, v) that satisfies Equation (18) and is continuous in all its arguments. The existence and uniqueness of the value function E follow from the contraction mapping theorem (theorem 3.2 in Stokey and Lucas 1989). The continuity of E follow from the continuity of e and the monotonicity of the Markov transition function of the process (u, v).

Appendix B. The Dynamics of Deposits and Credit Shocks

Introducing a more compact notation, the joint dynamics of the systematic and idiosyncratic risk is described by equation $s_t = H s_{t-1} + \zeta_t$

where

$$H = \begin{pmatrix} \kappa_u & 0 \\ 0 & \kappa_v \end{pmatrix}, \qquad \zeta_t = \begin{pmatrix} \sigma_u \varepsilon_t^u \\ \sigma_v \varepsilon_t \end{pmatrix}, \qquad \mathbb{E}_t \begin{bmatrix} \zeta_{t+1} \cdot \zeta_{t+1}' \end{bmatrix} = \begin{pmatrix} \sigma_u^2 & 0 \\ 0 & \sigma_v^2 \end{pmatrix} = T$$

and $(\varepsilon_t^u, \varepsilon_t)$ are standard normal variates with truncated support. The dynamics of $(Z_t, \log D_{t+1})$ in (15) is

$$X_t = \overline{X} + K X_{t-1} + \xi_t, \tag{A2}$$

where

$$X_t = \begin{pmatrix} Z_t \\ \log D_{t+1} \end{pmatrix}, \qquad \overline{X} = \begin{pmatrix} (1 - \kappa_Z)\overline{Z} \\ (1 - \kappa_D)\log \overline{D} \end{pmatrix}, \qquad K = \begin{pmatrix} \kappa_Z & 0 \\ 0 & \kappa_D \end{pmatrix}, \qquad \xi_t = \begin{pmatrix} \xi_t^Z \\ \xi_t^D \end{pmatrix},$$

and

$$\mathbb{E}_t \begin{bmatrix} \xi_{t+1} \cdot \xi_{t+1}' \end{bmatrix} = \begin{pmatrix} \sigma_Z^2 & \rho \sigma_Z \sigma_D \\ \rho \sigma_Z \sigma_D & \sigma_D^2 \end{pmatrix} = \Sigma$$

²⁰ Deposits and short-term bonds are the cheapest form of financing. If the same dollar were raised by issuing equity, the cost would be higher, owing both to the higher cost of equity capital and to floatation costs. In this case the upper bound would be even lower.

In the bank's model, to achieve the stochastic structure in Equation (A2), we have introduced the transformation (14), $X = \mu + Ns$, where $\mu = (\mu_1, \mu_2)$, and N is a matrix

$$N = \begin{pmatrix} v_{Z,u} & v_{Z,v} \\ v_{D,u} & v_{D,v} \end{pmatrix}$$

such that det $N \neq 0$. The bank's program will be solved (and simulated) in the state space S, and we will use the above affine transformation to calculate the values of the variables Z and D.

The parameters of the stochastic discount factor are taken from Jones and Tuzel (2013). Therefore, we are left with eight unknown parameters describing the stochastic structure of the model: $\mu_1, \mu_2, \kappa_v, \sigma_v, \nu_{Z,u}, \nu_{D,u}, \nu_{Z,v}, \nu_{D,v}$. From empirical data we calculate seven moment conditions: \overline{Z} , $\log \overline{D}$, κ_Z , σ_Z , κ_D , σ_D , ρ , as reported in Table 1. In what follows, we derive the equations that relate the unknown parameters to the moment conditions. From Equation (14), we have $s = N^{-1}(X - \mu)$. Replacing this in Equation (A1), after some manipulations we have

$$X_{t} = \left(I - NHN^{-1}\right)\mu + NHN^{-1}X_{t-1} + N\zeta_{t}$$

This dynamics is equal to the dynamics in Equation (A2) if the following conditions are simultaneously true: $\mu = (I - NHN^{-1})^{-1}\overline{X}$, $NHN^{-1} = K$, $NTN' = \Sigma$. Given the second equation, $\mu = (I - K)^{-1}\overline{X}$, so that the solution for $\mu = (\mu_1, \mu_2)$, is found in closed form relative to known moments conditions. The second and third conditions set seven equations (three from $NTN' = \Sigma$, given that the two matrices are symmetric, and four from $NHN^{-1} = K$) in the remaining six unknowns. We find a least square solution to this overidentified system of seven nonlinear equations. Using the parameter values in Table 1 in the paper, with the additional parameters for the macroeconomic risk, $\kappa_u = 0.98$, $\sigma_u = 0.007$, the robust solution obtained with a global optimization routine is $\mu_1 = 0.0717$, $\mu_2 = 0.6931$, $\kappa_v = 0.91992$, $\sigma_v = 0.009548$, $v_{Z,u} = 1.660682$, $v_{D,u} = -2.988127$, $v_{Z,v} = -0.798126$, and $v_{D,v} = 0.044359$. Although the model is overidentified, the process X, from Equation (15), with moments of $\hat{X} = \mu + Ns$, where s is the process in Equation (A1) with the above estimated parameters. This is can be seen in Table A1.

To understand the relationship that this calibration generates between the variables (u, v) and the variables (Z, D), we plot the values of Z and log D resulting from a numerical approximation of the dynamic of (u, v) in Figure 3. The variable log D appears strongly countercyclical, and depends only marginally on the idiosyncratic component, whereas the credit shocks Z are procyclical and negatively correlated with idiosyncratic risk.

Calibration			
	Original	X	\hat{X}
$\mathbb{E}[Z]$	0.0717	0.0718	0.0723
$\sigma[Z]$	0.0293	0.0236	0.0429
$\mathbb{E}[\log D]$	0.6931	0.6926	0.6920
$\sigma[\log D]$	0.0669	0.0471	0.0701
$(1-\kappa_Z)\overline{Z}$	0.0086	0.0129	0.0039
κZ	0.8800	0.8184	0.9357
σ_Z	0.0139	0.0135	0.0150
$(1-\kappa_D)\log\overline{D}$	0.0347	0.0733	0.0374
кD	0.9500	0.8940	0.9450
σ_D	0.0209	0.0210	0.0226
ρ^{-}	-0.8500	-0.7514	-0.8503

Results from the calibration procedure described in Appendix B. Column "*Original*" reports the value of the moments from Table 1. In Column "X" there is the mean value of the moments estimated from a simulation of *X*. Column " \hat{X} " reports the mean value of the moments estimated from a simulation (A1), and than using at each step of the simulated sample the transformation in Equation (14) to obtain \hat{X} .

Table A1

Appendix C. Numerical Solution and Simulation of the Valuation Problem

Given the dynamics of (u, v), we solve the program

$$E(x) = \max\left\{0, \max_{(L',B')\in\mathcal{A}(D)}\left\{e(x,L',B') + \mathbb{E}\left[M(x,x')E(x')\right]\right\}\right\},\$$

where function e(x, L, B), is defined in Equation (13), and $\mathcal{A}(D)$ is the case specific feasible set defined differently for the unregulated and the regulated case. The solution of the Bellman equation above is obtained numerically by a value iteration algorithm. The valuation model for bank's equity is a continuous decision and infinite-horizon Markov decision processes. The solution method is based on successive approximations of the fixed point solution of the Bellman equation. Numerically, we apply this method to an approximate discrete state-space and discrete decision valuation operator.²¹

The variables u and v are discretized using the numerical approach proposed by Rouwenhorst (1995), as the stochastic process of systematic risk is quite persistent. The feasible interval for loans, $[0, L_u]$, and for the face value of bonds, $[B_d, B_u]$ (with $B_d < 0 < B_u$), is set so that they are never binding for the equity maximizing program. We discretize $[L_d, L_u]$, to obtain a grid of n_L points

$$\widetilde{L} = \{ \widetilde{L}_j = L_u (1-\delta)^j \mid j=1, \dots, n_L - 1 \} \cup \{ L_{n_L} = 0 \}$$

such that, if the bank chooses inaction, the loan's level is what remains after the portion δL has been repaid. The interval $[B_d, B_u]$ is discretized into n_B equally-spaced values, making up the set \tilde{B} . To keep the notation simple, we also denote x = (s, L, B) the generic element of the discretized state.

For the set of parameters in Table 1, we use $L_u = 18$, $B_d = -7$ and $B_u = 3$. Given the properties of the quadrature scheme, we solve the model using only five points for *u* and seven points for *v*. However, we need to allow for many more points when discretizing the control variables, so we choose $n_L = 29$, and $N_B = 34$. The tolerance for termination of the value function iteration is set at 10^{-5} .

Given the optimal solution, we can determine the optimal policy and the transition function $\varphi(x)$ in Equation (19) based on the arg-max of equity value at the discrete states x. The optimal policy is used to generate fifty simulated economies, each characterized by a specific path of the systematic shock, and comprising 2,000 independent paths/banks for the idiosyncratic shock, for 100 periods (years). In particular, given the simulated dynamics of the state variables (u, v) by application of the recursive formula in Equation (15), we start from $Z(0)=\overline{Z}$ and $D(0)=D_d$. Then setting a feasible initial choice L(0)=0 and $B(0)=D_u$ (so that the initial bank capital is $D_u - D_d$), we apply the transition function φ along each simulated path recursively. If a bank defaults at a given step, then the current depositors receive the full value of their claim, while the deposit insurance agency pays the bankruptcy cost. Afterward, a seed capital $D_u - D_d$ is injected in the bank. Together with deposit D_d , the total amount D_u is momentarily invested in bonds, $B = D_u$, whereas L = 0. Then the "new" bank follows on the same path by applying the optimal policy. To limit the dependence of our results on the initial conditions, we drop the first fifty steps.

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²¹ See Rust (1996) or Burnside (1999) for a survey on numerical methods for continuous decision infinite horizon Markov decision processes.

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