

# Bank Competition for Neighborhood Deposits

**Mark J. Kutzbach**

FDIC

**Gary A. Wagner**

UofLouisiana, Lafayette

**C. Luke Watson**

FDIC

**DC Finance Day  
June 2026**

Views and opinions expressed here reflect those of the authors and do not necessarily reflect those of the FDIC or the United States.

# Motivation: What is the geographic scope of retail banking competition?

- ▶ Market definition matters for merger review, financial access, and measurement of local competition
- ▶ However, little consensus in banking literature on appropriate geographic unit:
  - ▶ e.g., counties, MSAs, zip codes, tracts, Federal Reserve banking markets
- ▶ Further, merger reviews are conducted using broad definitions, which implicitly average over customer heterogeneity within the same market
- ▶ If households are local in their branch choices, then coarse geographic markets may miss important heterogeneity in competition

## Research Approach

We use a model based approach to estimate neighborhood deposit concentration, and then compare our local measure with broader market definitions used in the literature and regulatory analysis

# Where We Fit and What We Add

We let household deposit demand reveal the geographic scope of competition

- ▶ Prior approaches all assume equal access within broad areas  
counties (Drechsler et al. 2017; Wang et al. 2022), MSAs (Adams et al. 2007; Dick 2008; Ho & Ishii 2011), tracts (Nguyen 2019), zips (Becker 2007); Fed markets (DiSalvo 1999)
- ▶ “Bank deserts” counts branches to measure access; we separate access from competition Van Leuven et al. (2024); Hegerty (2016)
- ▶ Coarse-market merger screens can miss localized harm Benson, Blattner, Grundl, Kim & Onishi (2024): reduced-form evidence; we provide the structural, residence-based analog
- ▶ We estimate a structural spatial demand model for banking services  
Ellickson, Grieco & Khvastunov (2020): future extension using BLP'95 style inversion technique
- ▶ Develop methodology to estimate local liquid savings  
Companion paper: Measuring Local Liquid Savings (KWW)

# Modeling Approach

We measure competition from the perspective of a representative household depositor in each census tract:

- ▶ Each depositor allocates liquid savings across branches and an outside option
  - ▶ Each tract has heterogeneous choice set based on tract density and branch locations
- ▶ Utility depends on:
  - ▶ distance to branch
  - ▶ branch characteristics plus bank fixed effects
  - ▶ tract characteristics
  - ▶ bank-type nesting: local, regional, nationwide
- ▶ We estimate tract-to-branch deposit flows and deposit shares,  $d_{\ell j}$
- ▶ We construct residence-based, tract-level bank concentration measure for household deposits:

$$THHI_{\ell} = 100 \cdot \sum_{j \in \mathcal{J}_{\ell}} \left( \frac{d_{\ell j}}{\sum_{k \in \mathcal{J}_{\ell}} d_{\ell k}} \right)^2$$

- ▶ **Liquid savings:** SCF + ACS
  - ▶ predict household liquid savings in SCF
  - ▶ map predictions to ACS households
  - ▶ aggregate to PUMAs and allocate to tracts
- ▶ **Tract characteristics:** ACS
  - ▶ Pop, Median Inc, Pct w/ Car, Pct H.Owner, EPOP, SqMi, Pct Land Devt.
- ▶ **Branch deposits and characteristics:**
  - ▶ FDIC Summary of Deposits: bank branches
  - ▶ Call Reports: bank balance sheets
  - ▶ Your Economy Time Series: business locations
- ▶ **Geography:**
  - ▶ geolocated branches and tract centroids
  - ▶ tract-specific branch choice sets based on endogenous search radius

## Household / Demand for Branch $b$

$$\underbrace{d_{lb}^H(\theta_H, \rho, \xi)}_{\text{Deposit Share}} = \underbrace{P_l^H(b | m(b))}_{\text{Prob of Choosing } b \text{ given choice of group}} \cdot \underbrace{P_l^H(m(b))}_{\text{Prob of choosing group}} \quad (1)$$

where

$$P_l^H(b | m) = \frac{\exp(v_{lb}^H / \rho_m)}{\sum_{k \in M_{lm}} \exp(v_{lk}^H / \rho_m)}, \quad (2)$$

$$P_l^H(m) = \frac{\left[ \sum_{k \in M_{lm}} \exp(v_{lk}^H / \rho_m) \right]^{\rho_m}}{\exp(v_{l0}^H) + \sum_{m' \in \mathcal{M}} \left[ \sum_{k \in M_{lm'}} \exp(v_{lk}^H / \rho_{m'}) \right]^{\rho_{m'}}} \quad (3)$$

$$v_{lb}^H = \beta_x^H x_{lb} + Y_b \beta_Y^H + Z_l \beta_Z^H + (x_{lb} \cdot Z_l) \beta_{xZ}^H + (Y_b \cdot Z_l) \beta_{YZ}^H + \xi_{jb} \quad (4)$$

## Estimation

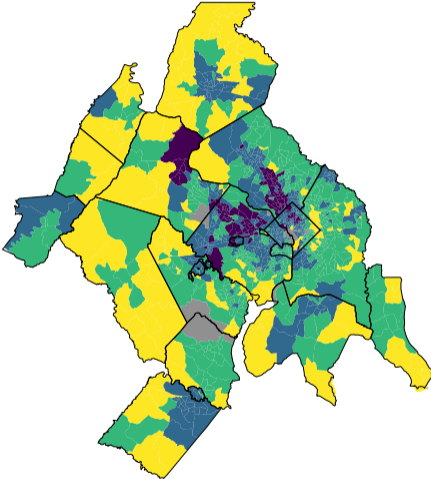
We use the model to predict bank branch deposits,  $\hat{D}$ , and the aggregate outside share,  $\hat{d}$ , and then fit the model using regulatory data on deposits at bank branches:

$$\min_{\theta} \left\{ \sum_{b \in \mathcal{B}} \left( \ln(\hat{D}_b(\theta)) - \ln(D_b) \right)^2 + \left( \hat{d}_0(\theta) - d_0 \right)^2 \right\}$$

The model is identified under the following assumptions (EGK 2020):

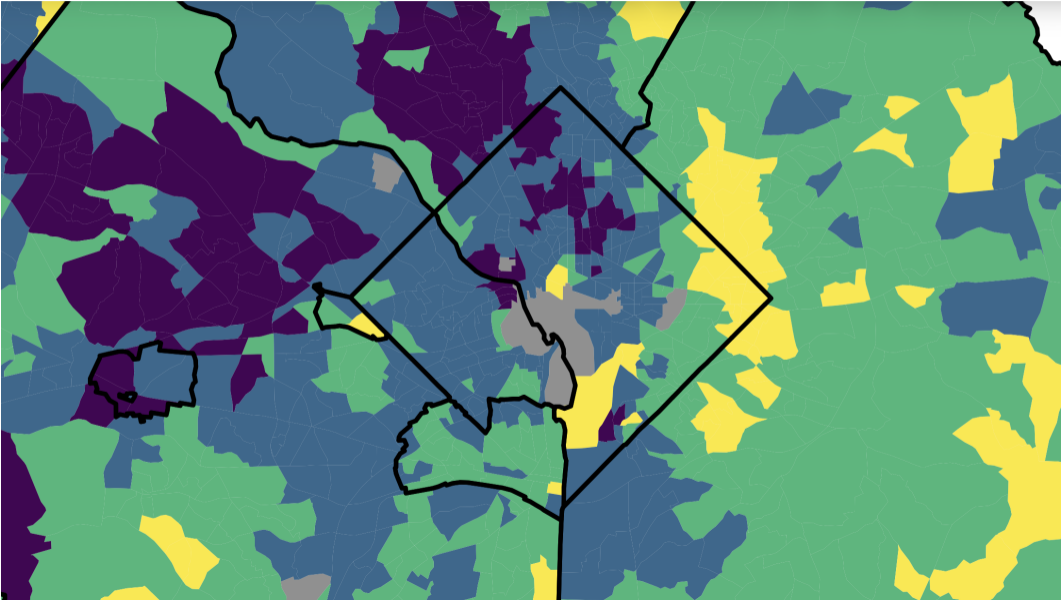
1. Taste preferences and model errors are both uncorrelated with
  - (i) store locations & characteristics and
  - (ii) consumer characteristics
2. Branch quality and product pricing are at the bank level

# DC Metro: FedHHI = 10.9 vs Avg THHI = 18.1



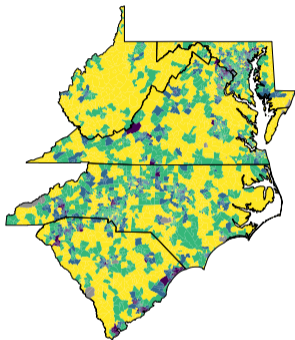
HHI [5-10] [10-15] [15-25] [25-100] NA

# Zoom in on DC



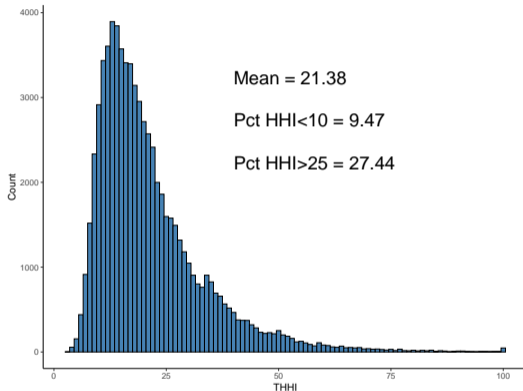
# Zoom Out

Fifth District: Avg THHI = 22.0



HHI [5-10] [10-15] [15-25] [25-100] NA

Nationwide distribution of THHI



- ▶ Outside major metros, tracts are markedly more concentrated
- ▶ Mean THHI of 21 matches branch-based county HHI (Gödl-Hanisch, FDIC CFR WP 2022)

## Key fact #1: Deposit markets are local

- ▶ For half of tracts, 50% of deposits go to branches within **1.7 miles**
- ▶ For three-quarters of tracts, 90% of deposits stay within **5.9 miles**
- ▶ Deposits decay about **12% per mile** from the tract (semi-elasticity  $-12.2$ )

	Q25	Q50	Q75	Mean
50% of tract deposits within (mi)	1.2	1.7	3.2	3.0
90% of tract deposits within (mi)	1.8	2.5	5.9	4.7

### Implications

Households are very local in their branch choices, so markets defined at MSA or county scale will average over depositors who do not actually compete for the same branches

## Key fact #2: Most THHI variation is within standard geographies

- ▶ Tract HHI is highly heterogeneous across neighborhoods
- ▶ This heterogeneity is not mainly between MSAs
- ▶ In the current draft, about **89%** of variation in tract HHI is *within* MSAs rather than *across* MSAs

Geographic Unit	Within	Across
MSA	88–89%	11–12%
County	72%	28%

### Implications

For understanding competitive conditions faced by households, it is much more important to know *where within a market* a household lives than simply which MSA it lives in

## Key fact #3: Local concentration varies systematically across neighborhoods

- ▶ Tract-level concentration is not just a relabeling of population or income
- ▶ Lower-income and less-educated neighborhoods tend to face higher concentration
- ▶ More branch-dense places tend to be less concentrated
- ▶ The model distinguishes *access* from *competition*
  - ▶ a tract can have few branches but several competing banks
  - ▶ or many branches but mostly from the same bank

### Implications

Coarse market measures can hide meaningful neighborhood differences in banking competition and financial access

# Merger Simulation

- ▶ We simulate *all* pairwise bank mergers within each MSA, holding household preferences, branch locations, and behavior fixed
  - ▶ 340 MSAs, more than 315,000 hypothetical mergers
  - ▶ isolates the first-order, mechanical effect of consolidation

- ▶ Combining two banks' tract shares changes local concentration by:

$$\Delta THHI_{\ell} = 2 \cdot s_{A\ell} s_{B\ell} \cdot 10,000$$

- ▶ HHI increases *only* where both banks draw deposits from the same tract
- ▶ For each bank, we measure 'customer distance' using deposit-weighted avg. of tract income, education, age, homeownership
- ▶ For each merger, we compare tract-level effects against the standard MSA-level screen

## Customer similarity predicts localized merger harm

**False negative:** pass MSA screen but 10+ tracts w/  $\Delta THHI > 200$

Quartiles of customer distance within each MSA

	Q1 (Most Similar)	Q2	Q3	Q4 (Least Similar)
Mean $\Delta THHI$	<b>22.66</b>	7.42	3.02	<b>1.15</b>
P90 $\Delta THHI$	52.99	11.88	3.22	0.49
False Negative Rate (%)	<b>10.01</b>	2.87	1.00	<b>0.27</b>
N Mergers	78,920	78,828	78,747	78,658

### Key finding

**2.6%** of all simulated mergers pass the MSA screen yet raise concentration by  $>200$  HHI points in **10 or more tracts** — and these cluster in the most-similar quartile

## Where screens fail: small and rural markets

- ▶ False negatives are most likely when banks
  - ▶ serve similar customers, but
  - ▶ operate spatially segmented branch networks
- ▶ Customer substitution is high even when geographic overlap looks modest
- ▶ The effect is sharply larger in *small* MSAs:

	Small ( $\leq 100$ tracts)	Medium	Large ( $> 500$ )
Customer-similarity effect	10.54	3.47	0.41
Within-MSA $R^2$	0.37	0.26	0.11

### Policy implication

Coarse screens understate merger effects precisely outside major metros — the smaller and rural markets where community banks consolidate

## Conclusion: Bank Competition for Neighborhood Deposits

- ▶ We develop a tract-level measure of retail banking competition from household deposit allocation across nearby branches
- ▶ Deposit markets are local: most households' deposits stay within a few miles
- ▶ Competition varies sharply *within* conventional markets — 89% of THHI variation is within MSAs, not across them
- ▶ Coarse merger screens can miss localized harm, concentrated in mergers between banks with similar customers but segmented networks and/or small, rural markets
- ▶ Potential applications include: identifying divestment areas, predicting where branches will close/open, assessing credit effects of bank mergers