



Comptroller of the Currency
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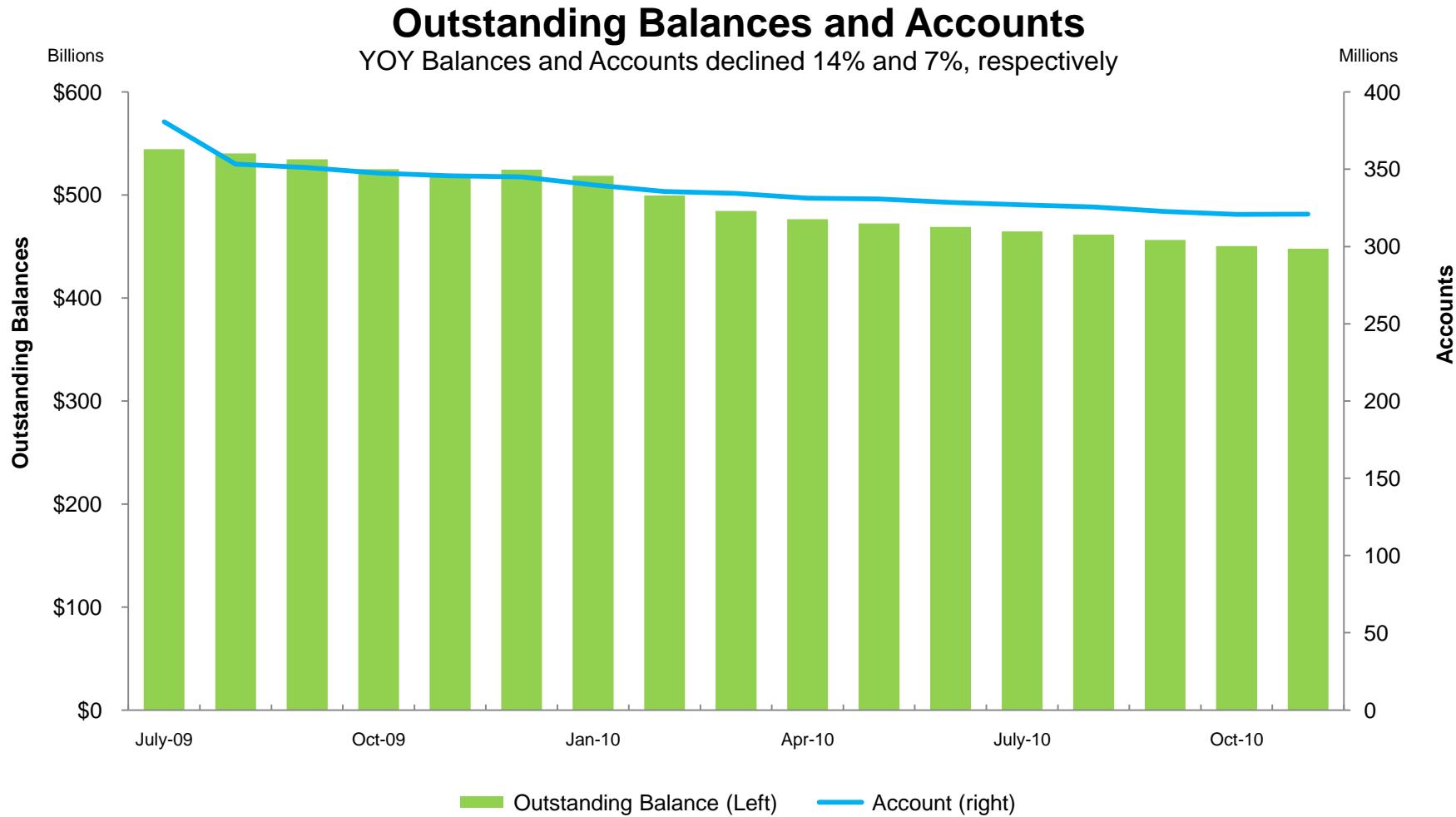
The CARD Act – One Year Later

Impact on Pricing and Fees

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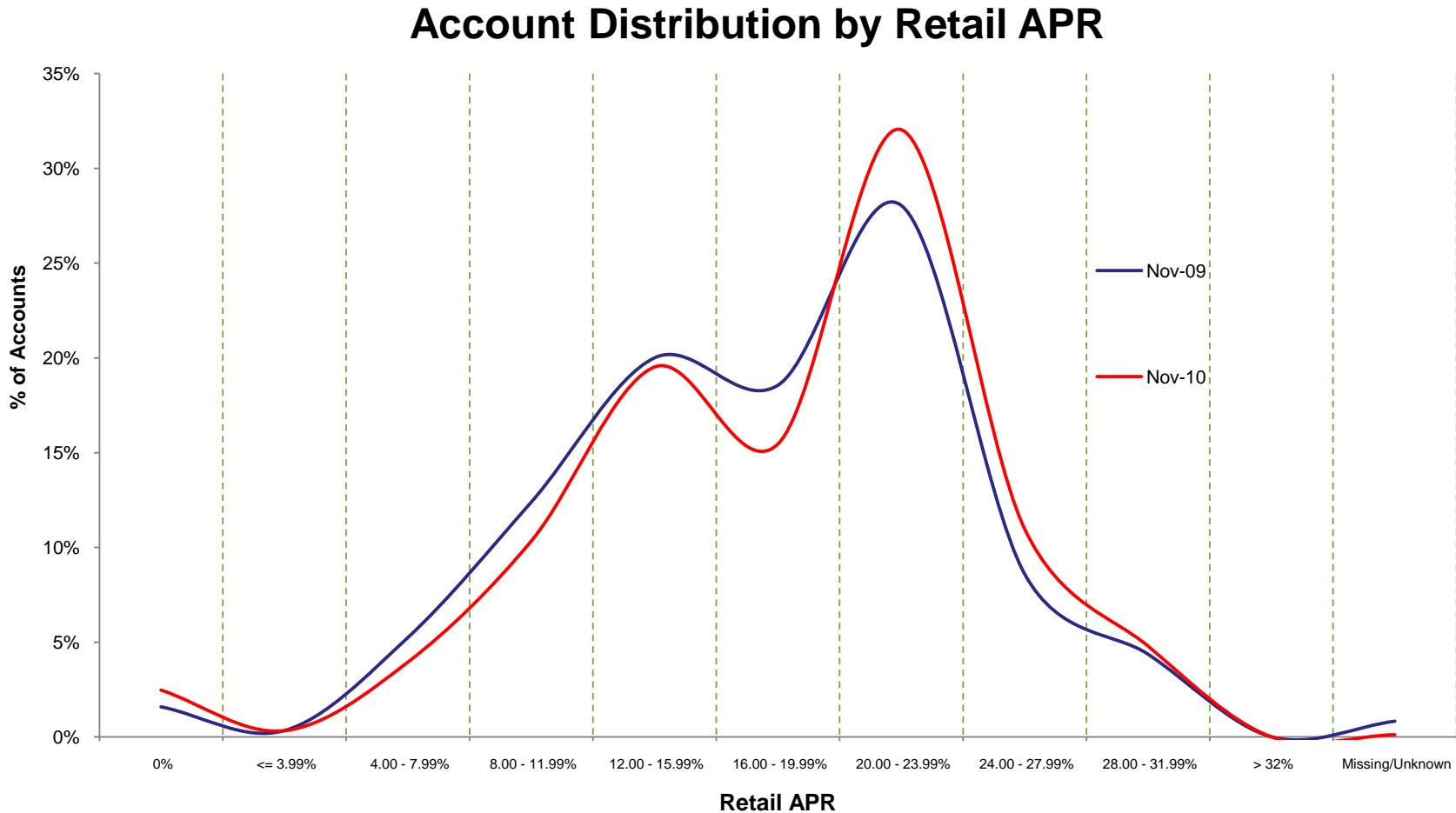


The OCC collects National Bank loan level credit card data...Serves as a tool for our analysis of Card Act Impact



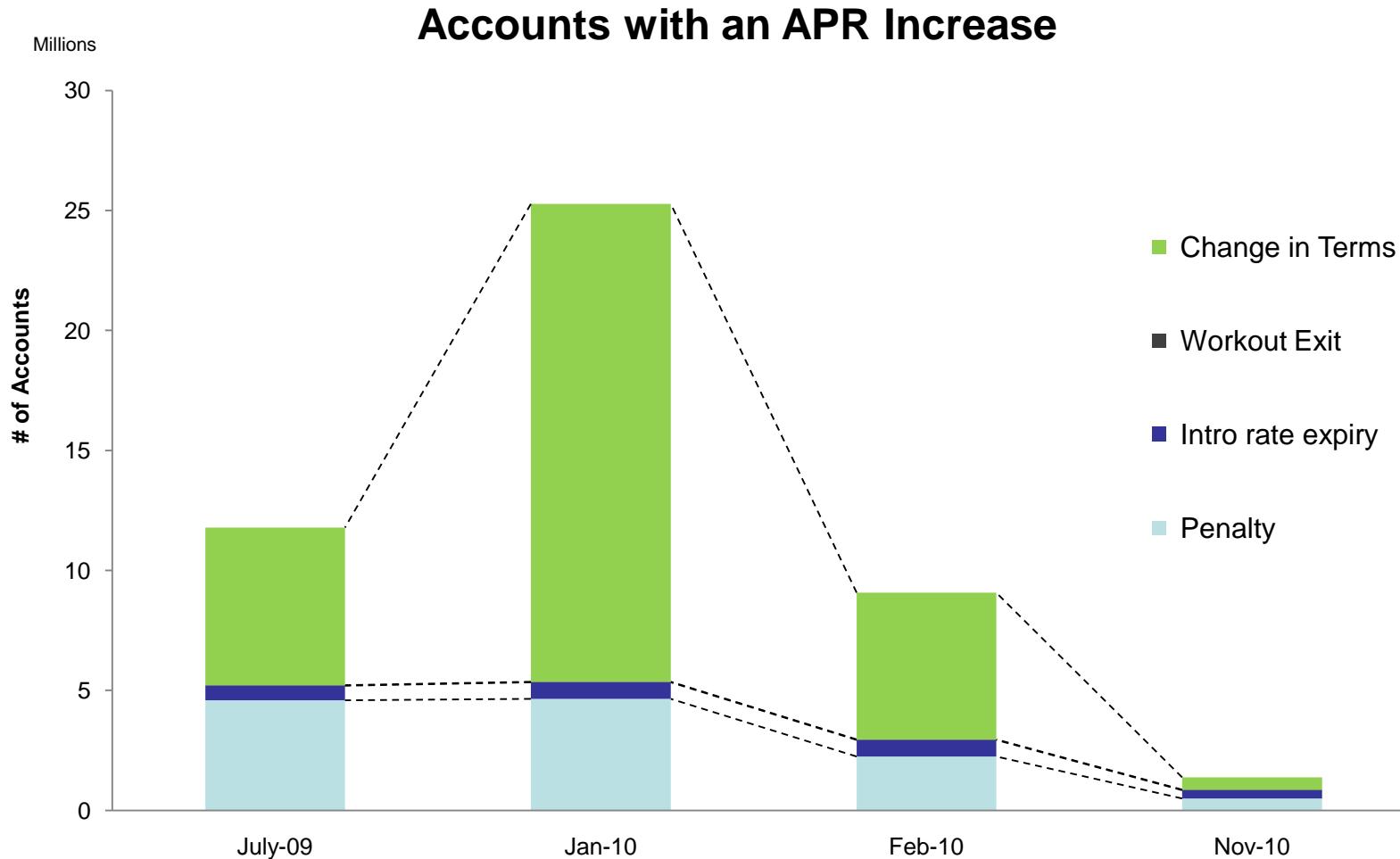


More accounts are subject to higher APR than in the past, increasing shortly before the Card Act



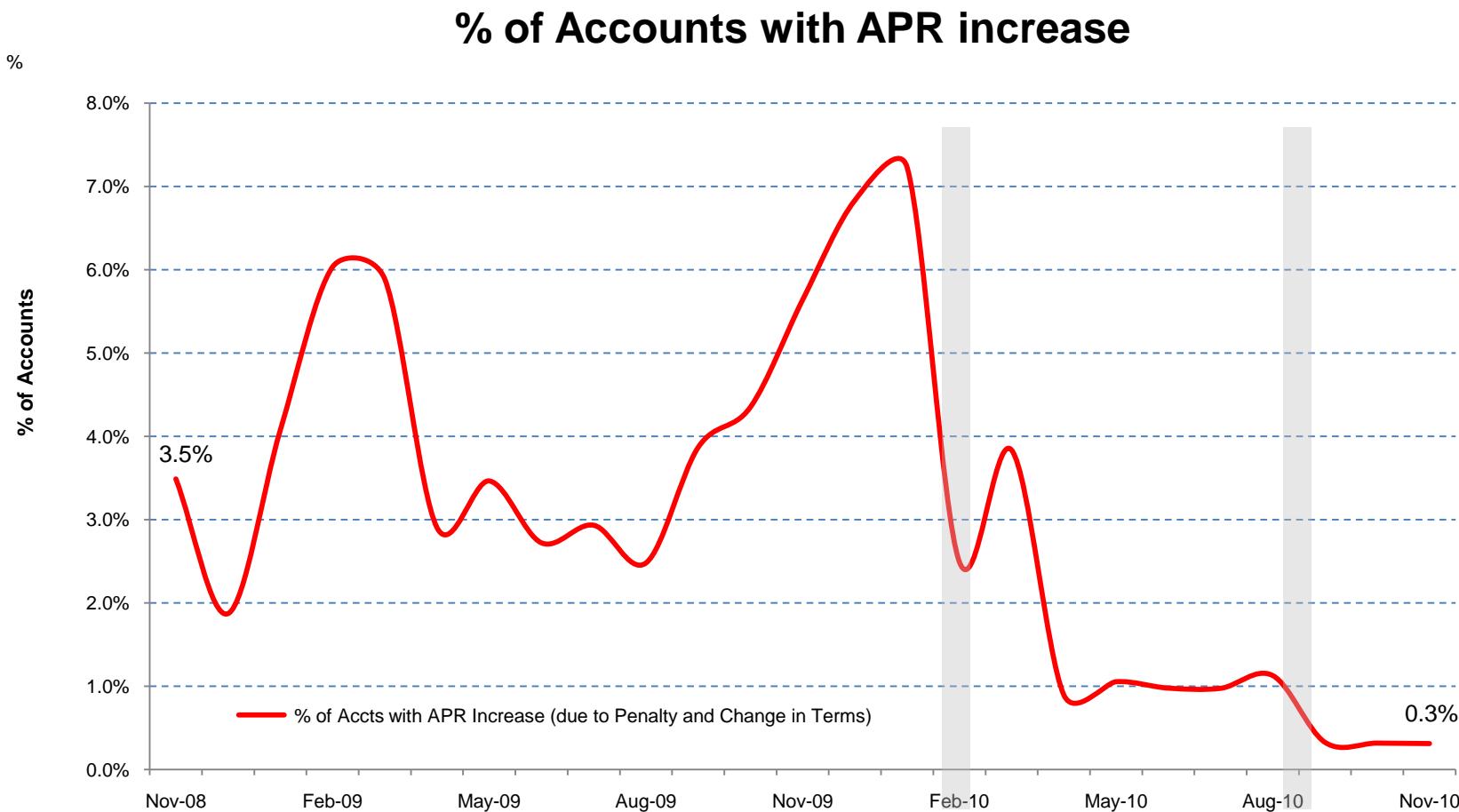


But since the Act went into effect, upward repricing down significantly



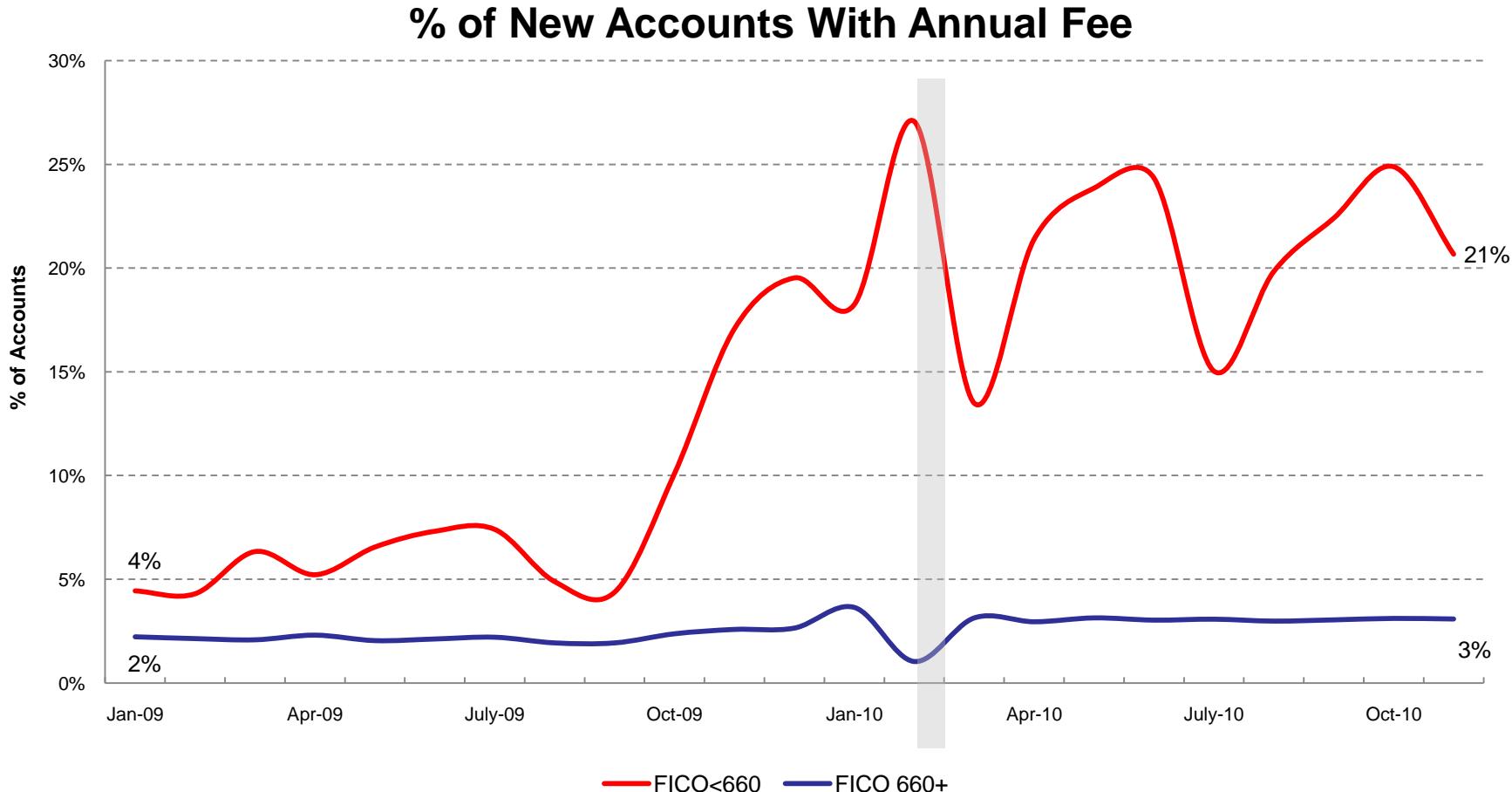


With a small percentage of accounts with an APR change in terms or penalty reprice



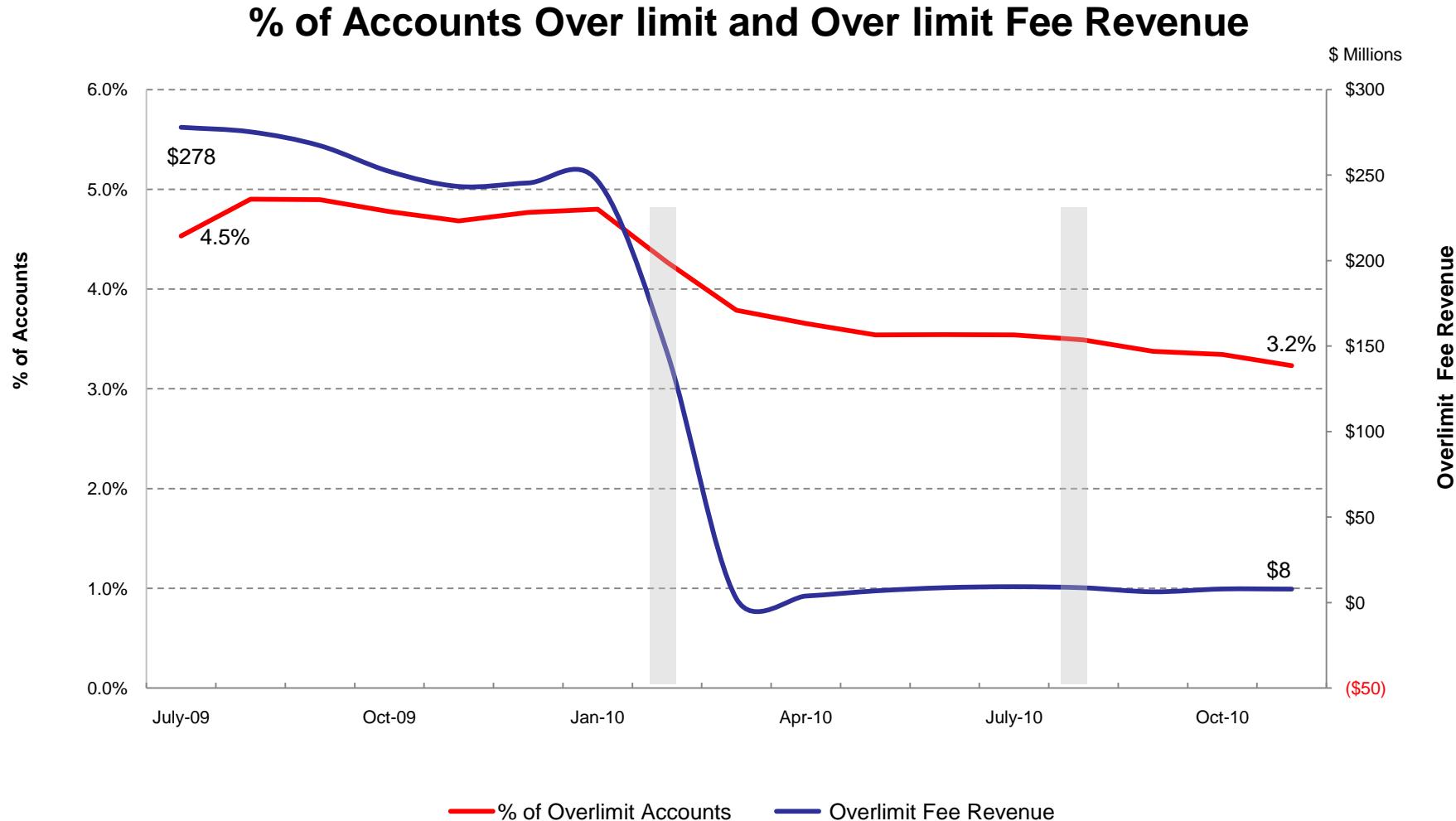


Annual fee is coming back, especially for higher risk accounts



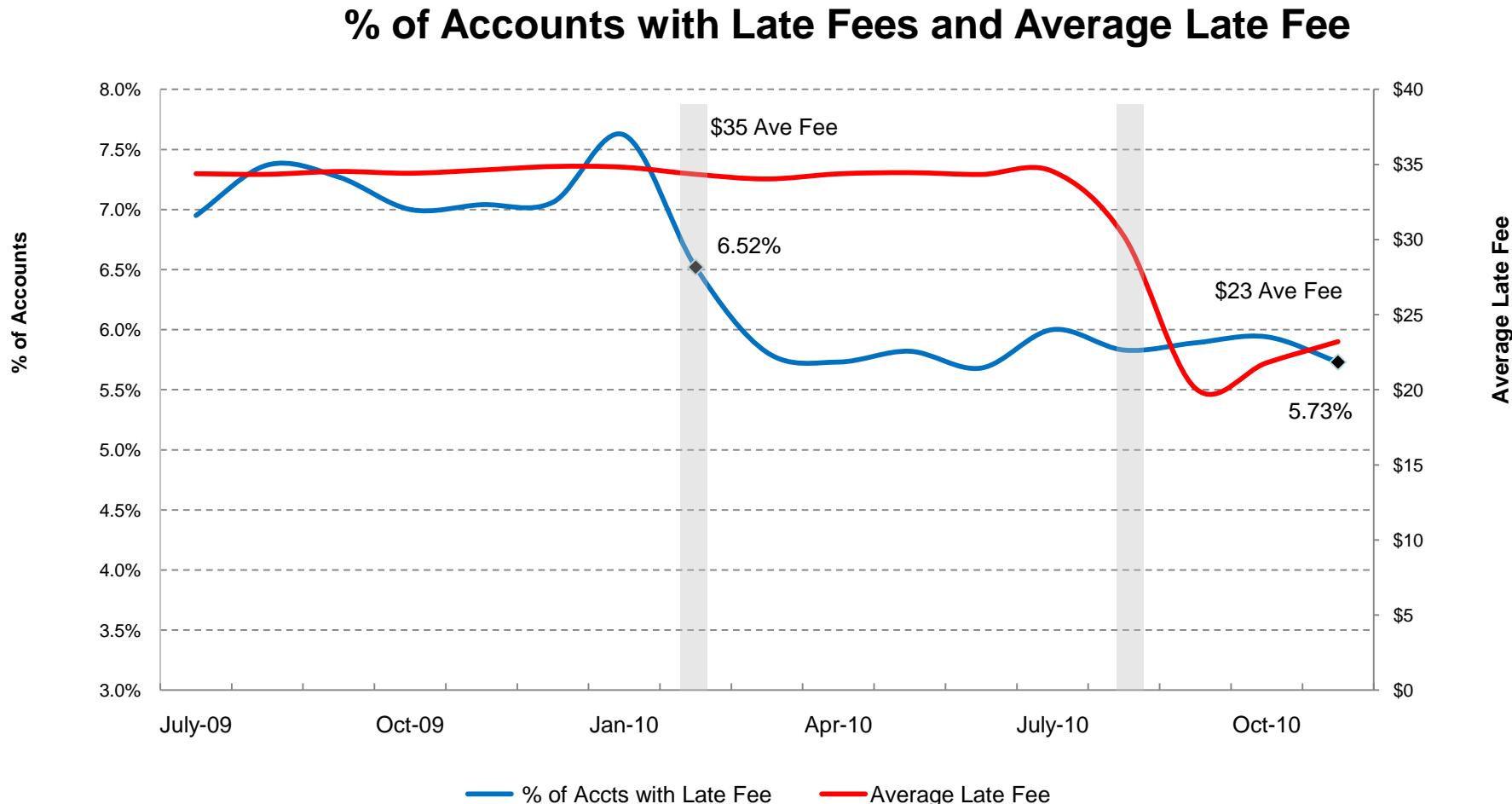


Over limit fees essentially disappeared



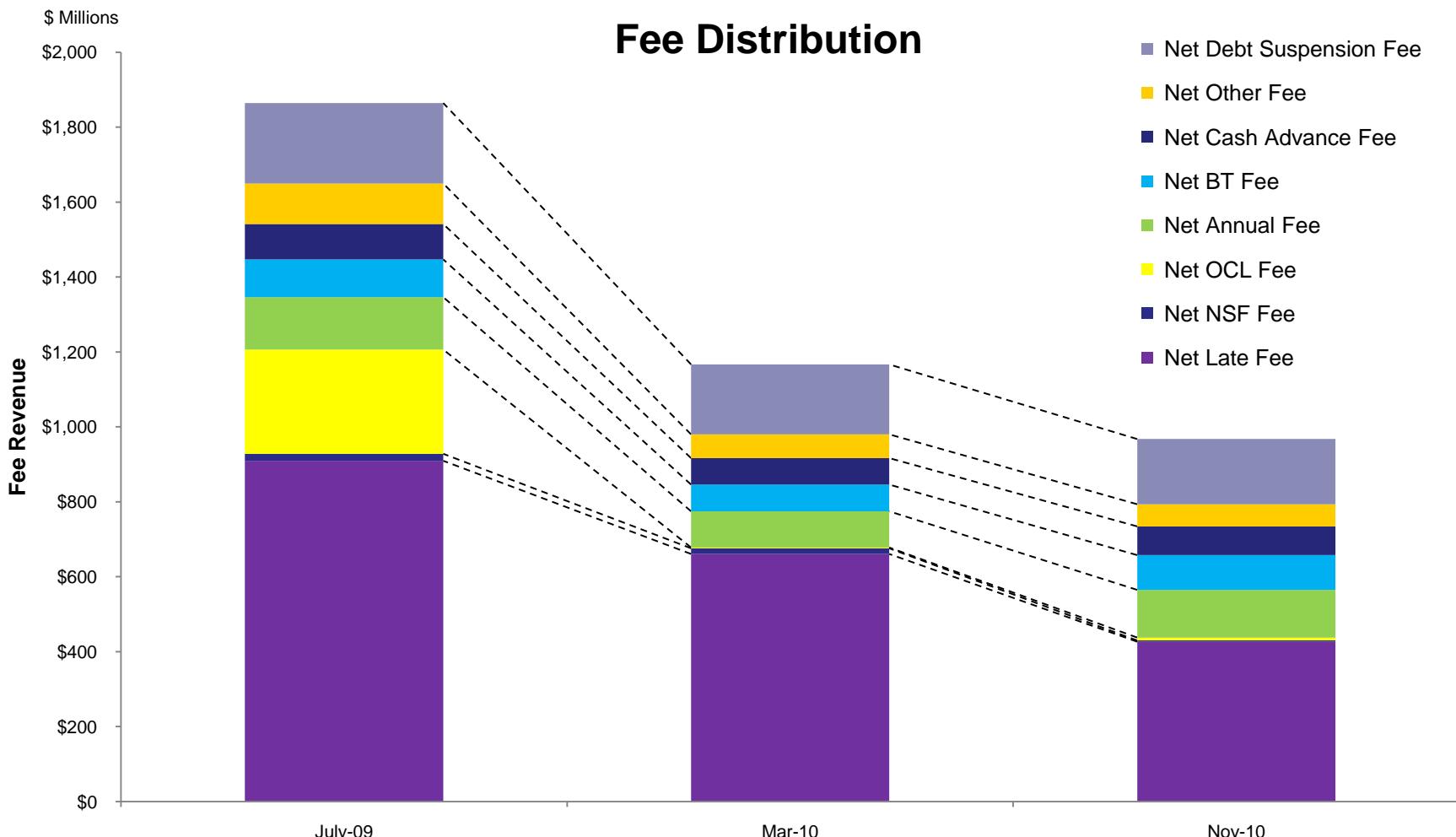


Also a material reduction in both occurrence of accounts being late and size of late fee charged





We are closely monitoring fee distributions for a shift or introduction of new fees. Nothing clearly evident yet...





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Questions?