



The CARD Act – One Year Later Impact on Pricing and Fees

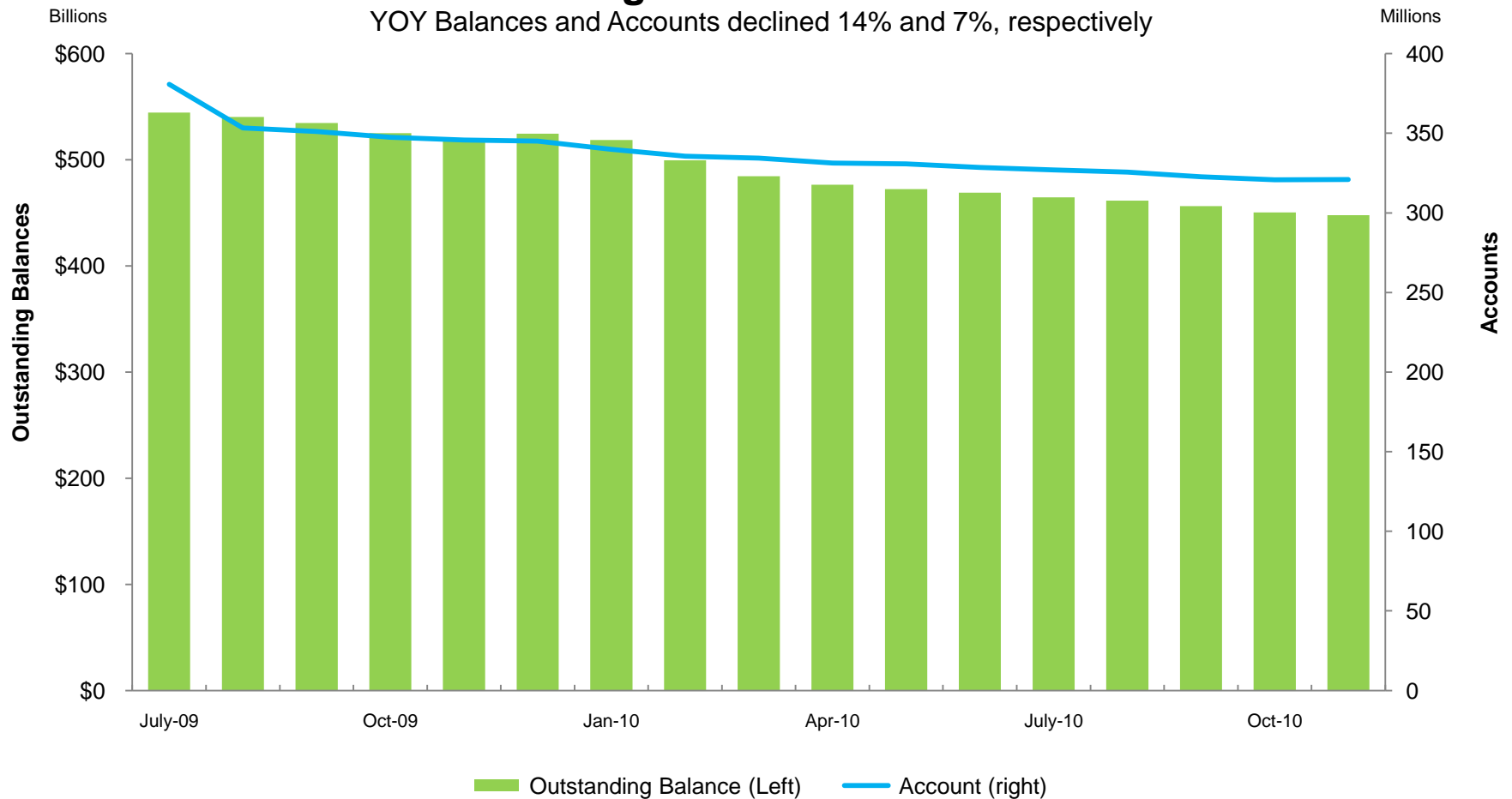
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The OCC collects National Bank loan level credit card data...Serves as a tool for our analysis of Card Act Impact

Outstanding Balances and Accounts

YOY Balances and Accounts declined 14% and 7%, respectively

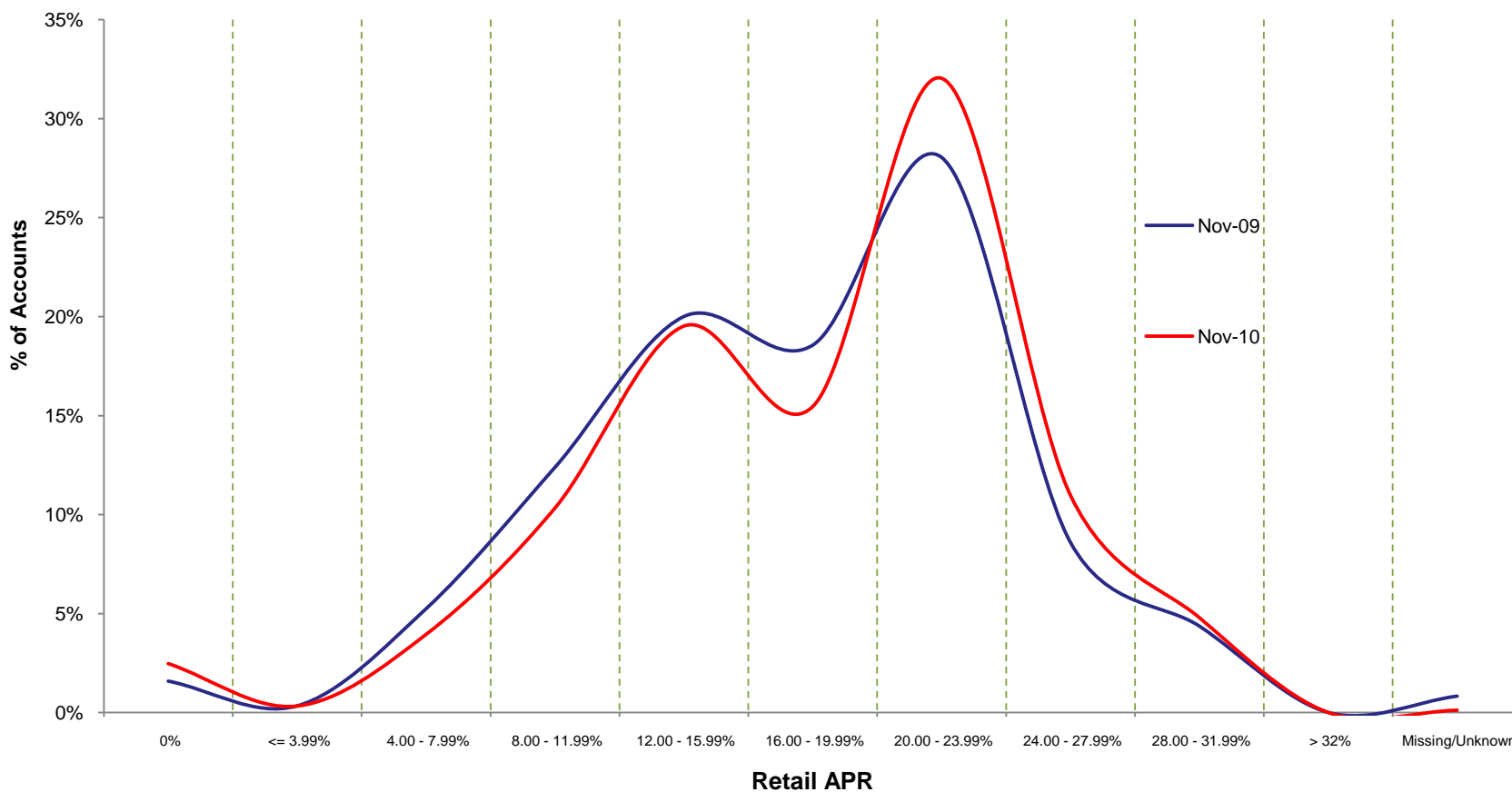


Source: OCC Credit Card Metrics
General Purpose and Private Label Credit Card Only – approximately 65% of industry



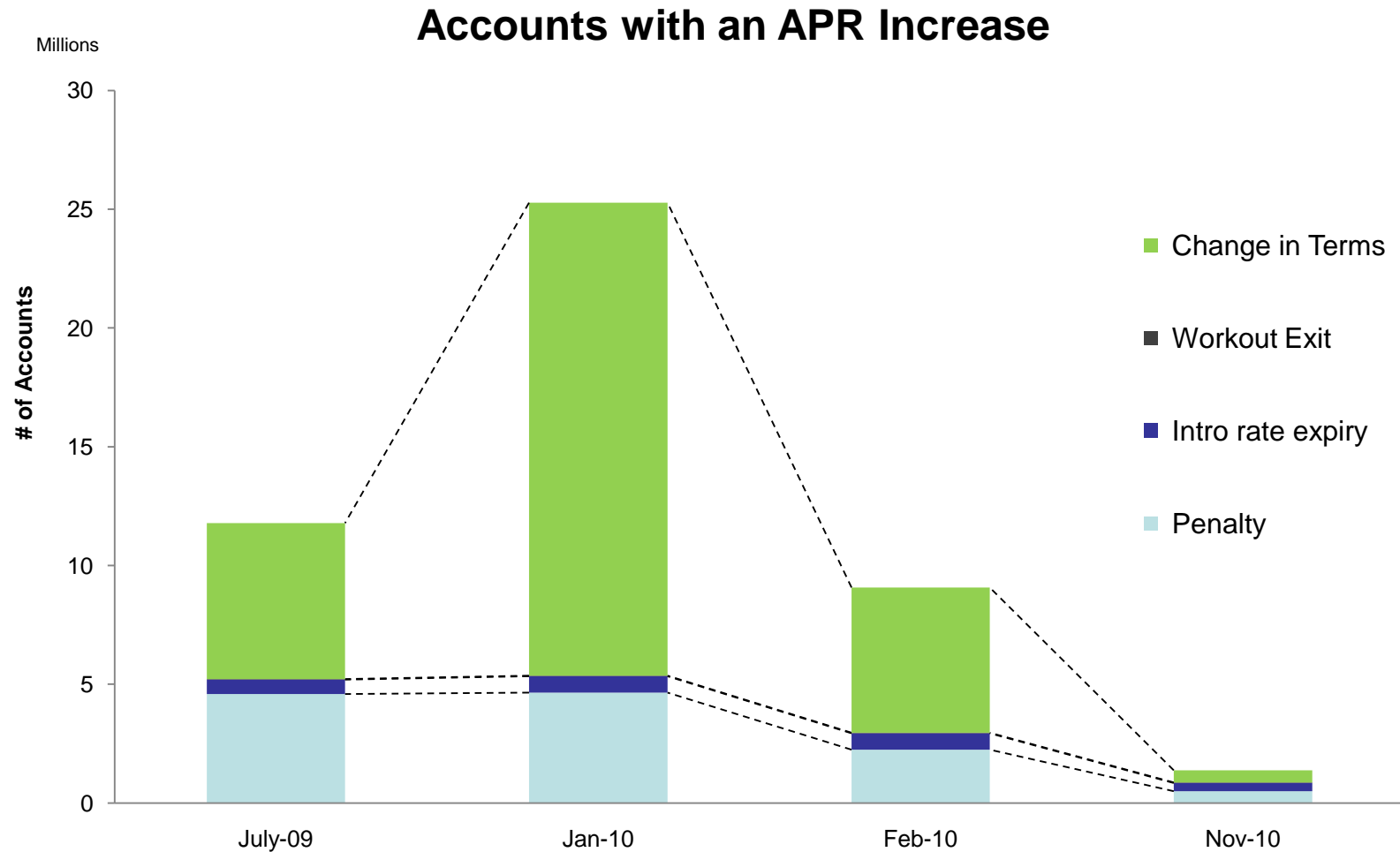
More accounts are subject to higher APR than in the past, increasing shortly before the Card Act

Account Distribution by Retail APR





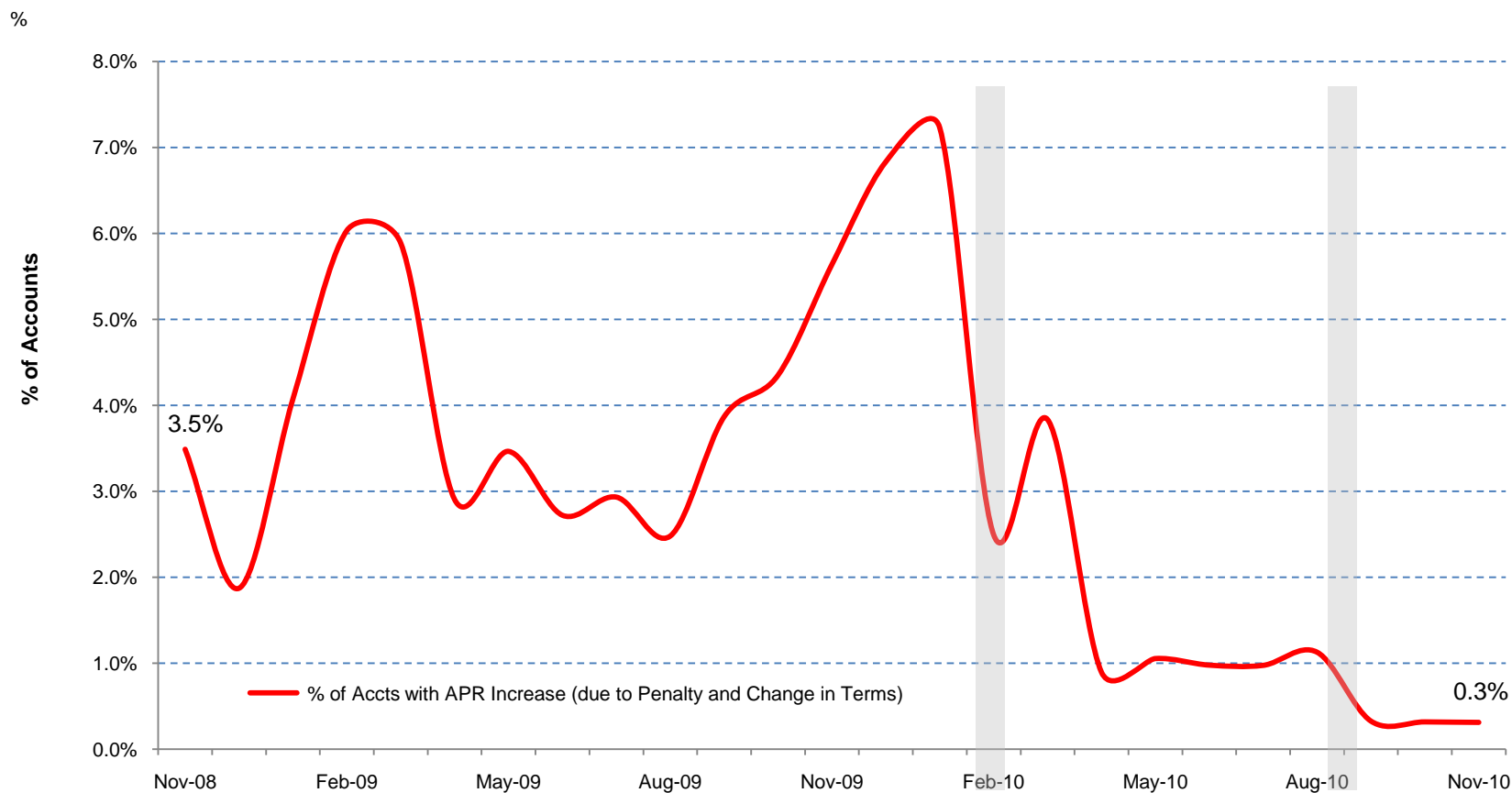
But since the Act went into effect, upward repricing down significantly





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

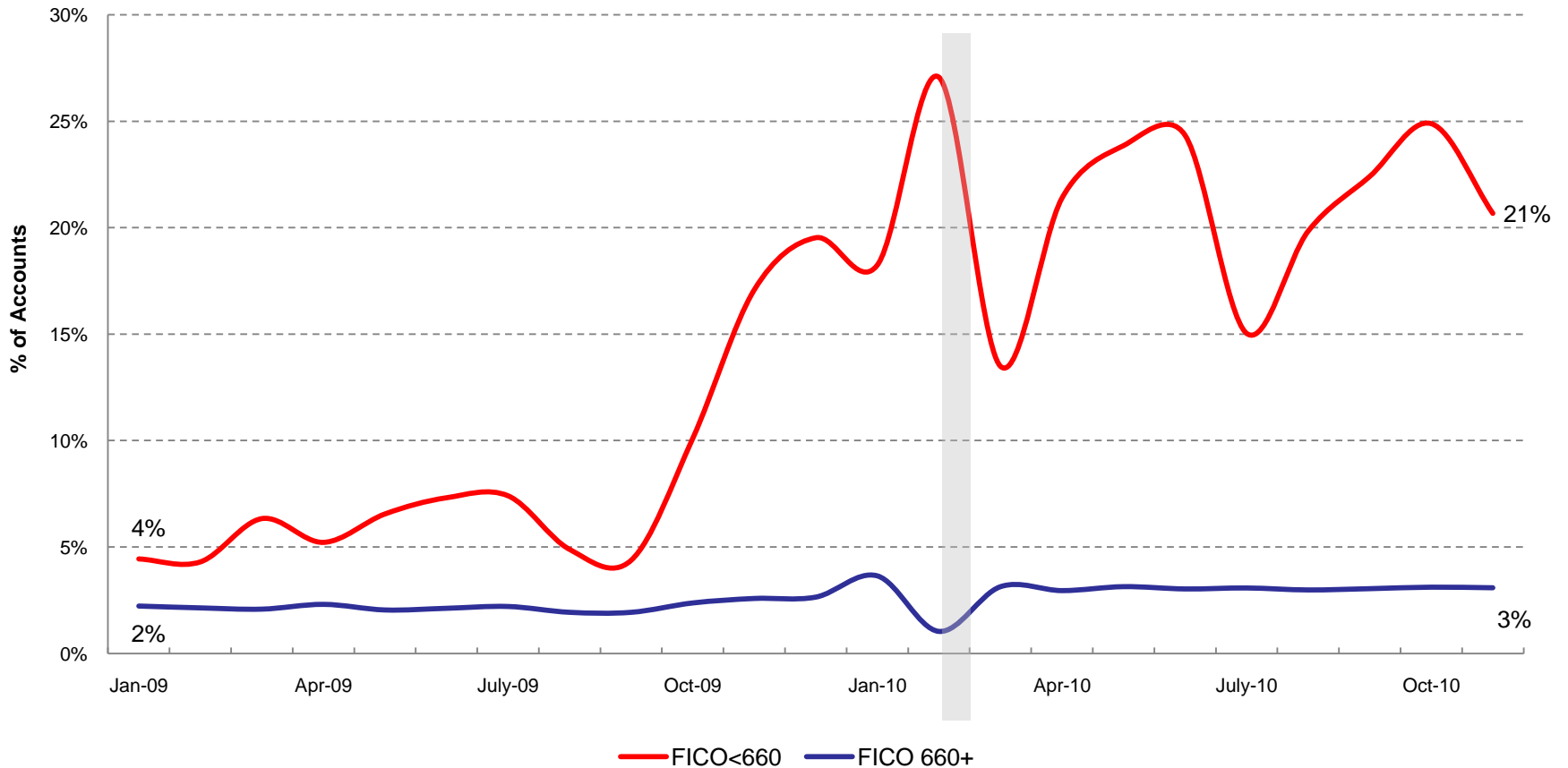
% of Accounts with APR increase





Annual fee is coming back, especially for higher risk accounts

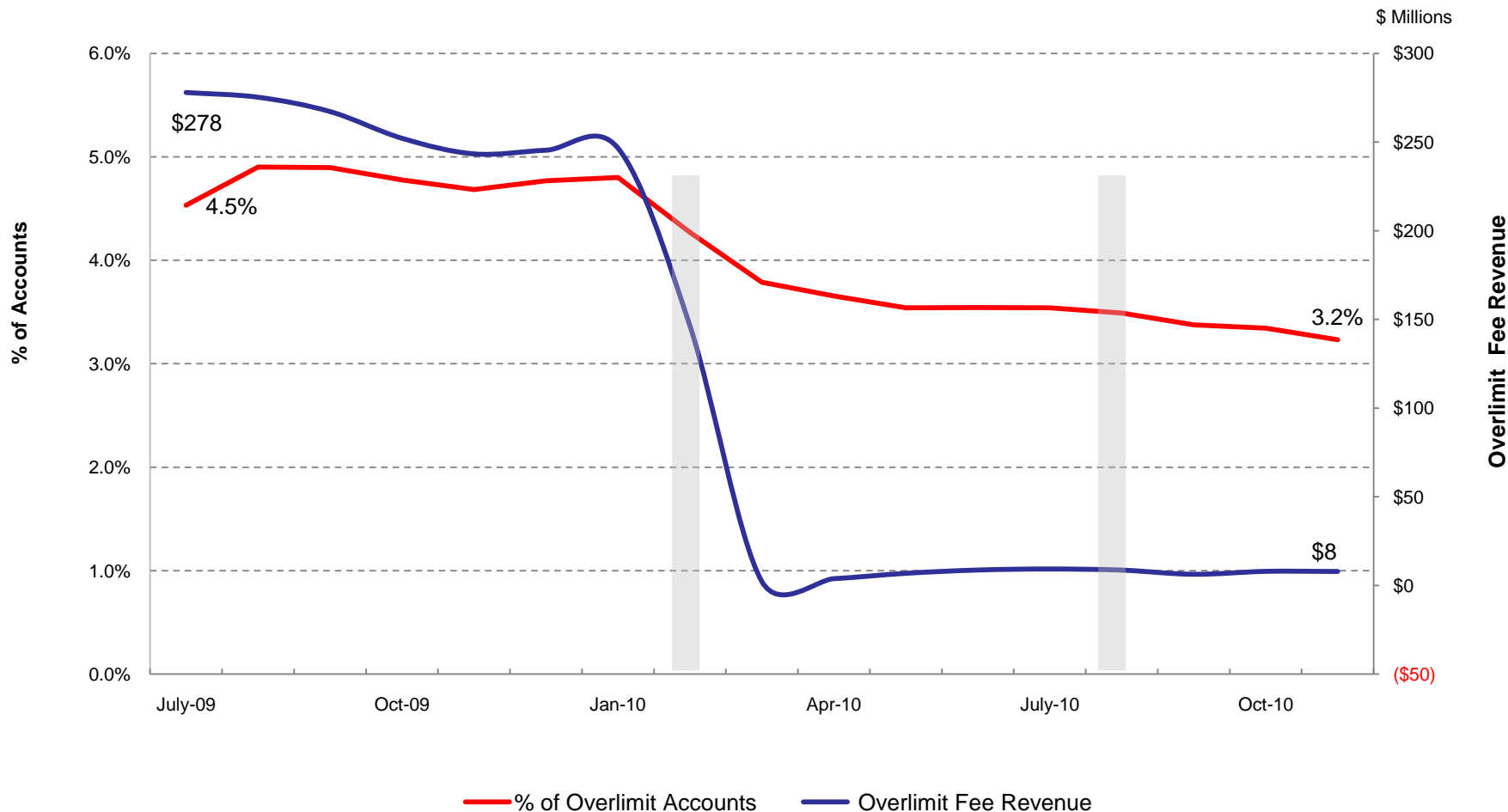
% of New Accounts With Annual Fee





Over limit fees essentially disappeared

% of Accounts Over limit and Over limit Fee Revenue

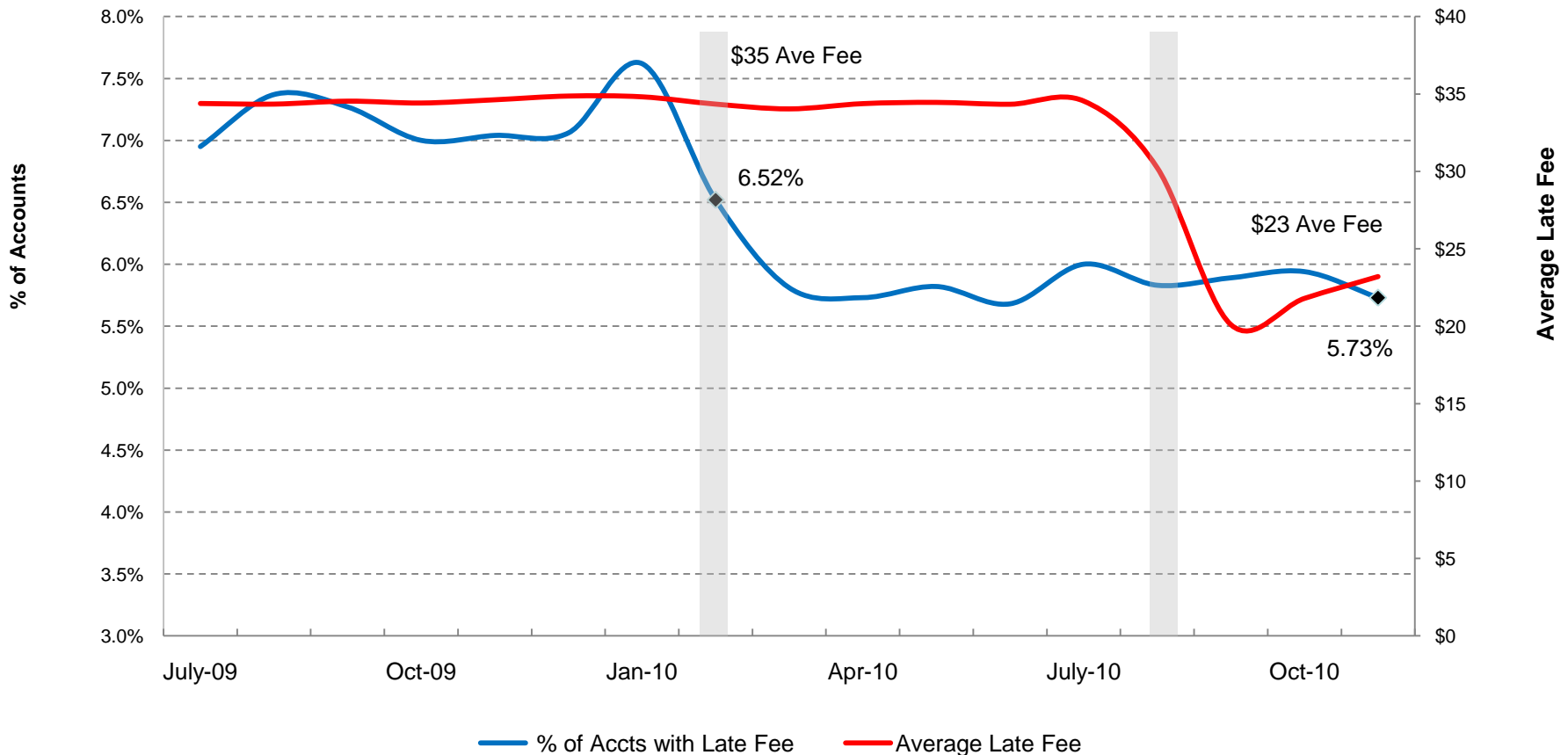


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General Purpose and Private Label Credit Card Only



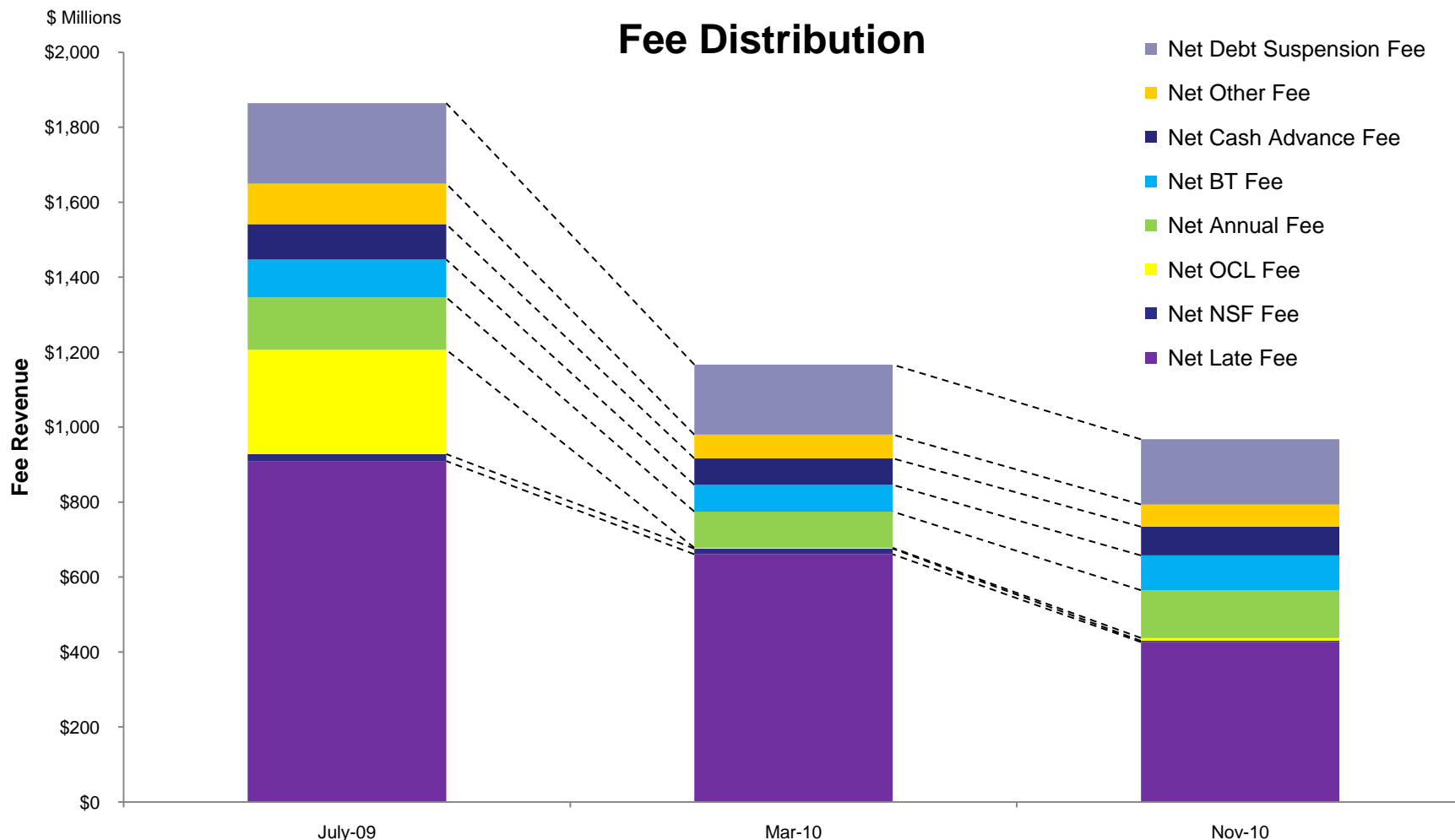
Also a material reduction in both occurrence of accounts being late and size of late fee charged

% of Accounts with Late Fees and Average Late Fee





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





Questions?