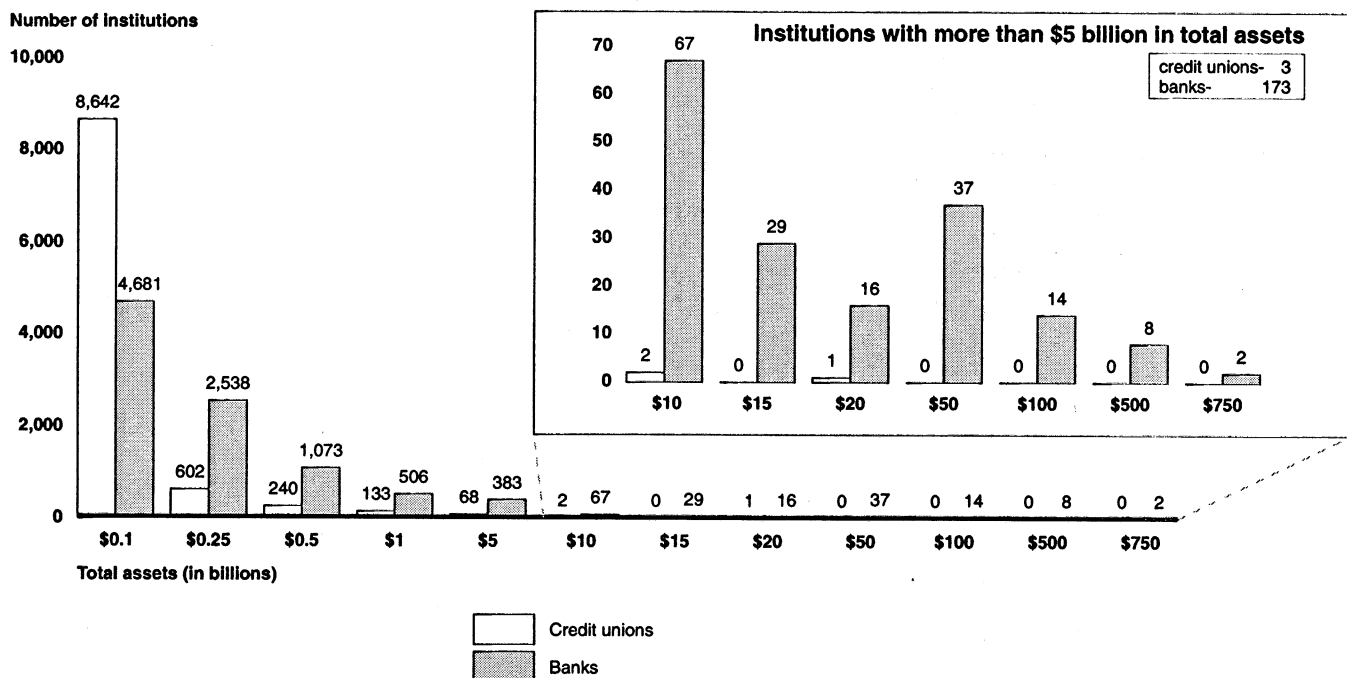


Comparison of Bank and Credit Union Distribution of Assets

Figures 21, 22, and 23 illustrate the marked size disparity between credit unions and institutions insured by the Federal Deposit Insurance Corporation (FDIC), with figure 21 highlighting how small most credit unions are.¹ At the end of 2002, the largest credit union had less than \$18 billion in assets, while the largest bank, with over \$600 billion in assets, was larger than the entire credit union industry.

Figure 21: Total Assets of All Credit Unions and All Banks, as of 2002



Source: Call report data.

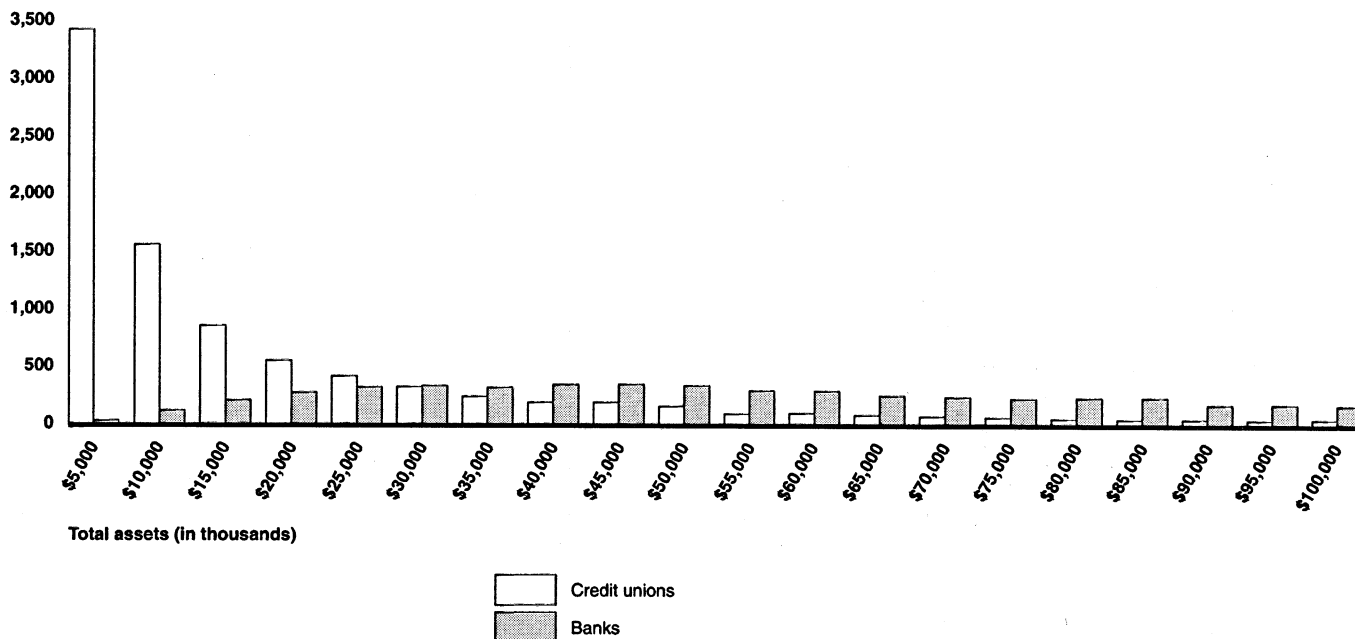
Note: Data are as of December 31, 2002, and include all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions are excluded. This figure depicts the number of institutions in a particular asset size category. Each category represents a range—for example, the first category includes all institutions with assets of \$100 million or less, while the second category includes all institutions with assets greater than \$100 million and less than or equal to \$250 million, up to the last category, which includes all institutions with assets greater than \$500 million and less than or equal to \$750 billion.

¹Throughout the report, we refer to institutions insured by the FDIC interchangeably as “banks,” “banks and thrifts,” and “FDIC-insured institutions.”

Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets

Figure 22: Total Assets of Credit Unions and Banks with Less Than \$100 Million in Assets, as of 2002

Number of Institutions

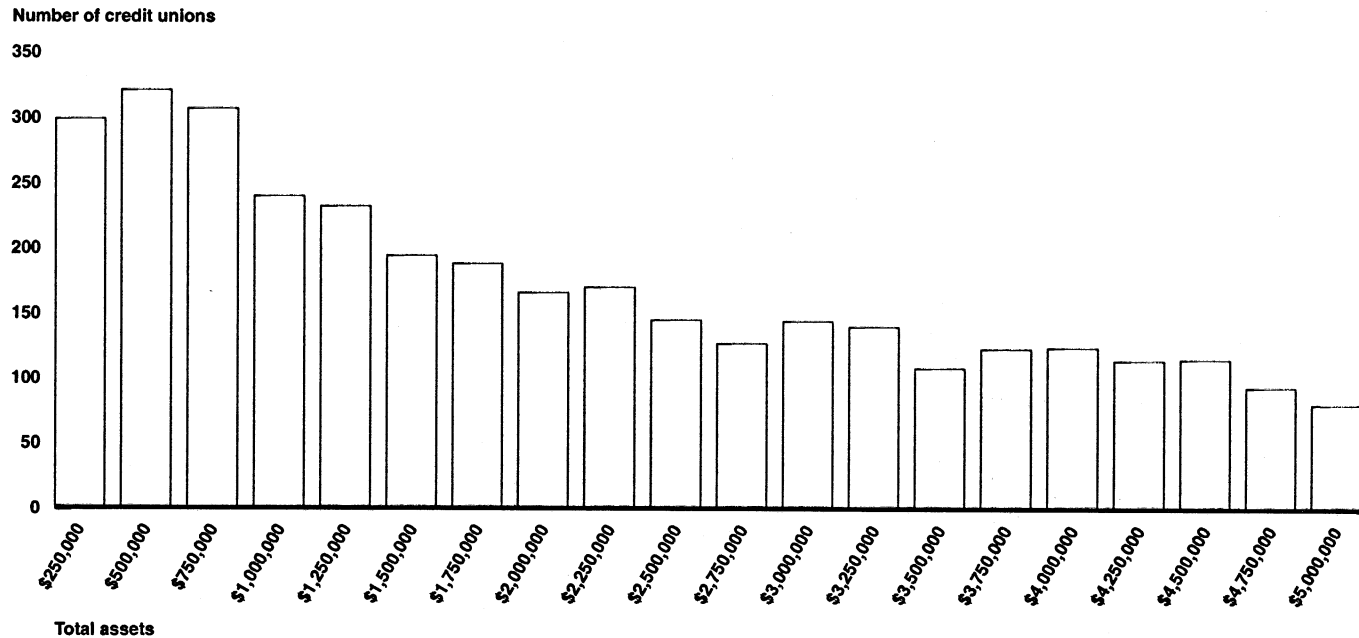


Source: Call report data.

Note: Data are as of December 31, 2002, and include all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions are excluded. This figure depicts the number of institutions in a particular asset size category. Each category represents a range—for example, the first category includes all institutions with assets of \$5 million or less, while the second category includes all institutions with assets greater than \$5 million and less than or equal to \$10 million, up to the last category, which includes all institutions with assets greater than \$95 million and less than or equal to \$100 million.

Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets

Figure 23: Total Assets of Credit Unions with Less Than \$5 Million in Assets, as of 2002



Source: Call report data.

Note: Data are as of December 31, 2002, and include all federally insured credit unions filing call reports. This figure depicts the number of institutions in a particular asset size category. Each category represents a range—for example, the first category includes all institutions with assets of \$250,000 or less, while the second category includes all institutions with assets greater than \$250,000 and less than or equal to \$500,000, up to the last category, which includes all institutions with assets greater than \$4.75 million and less than or equal to \$5 million.

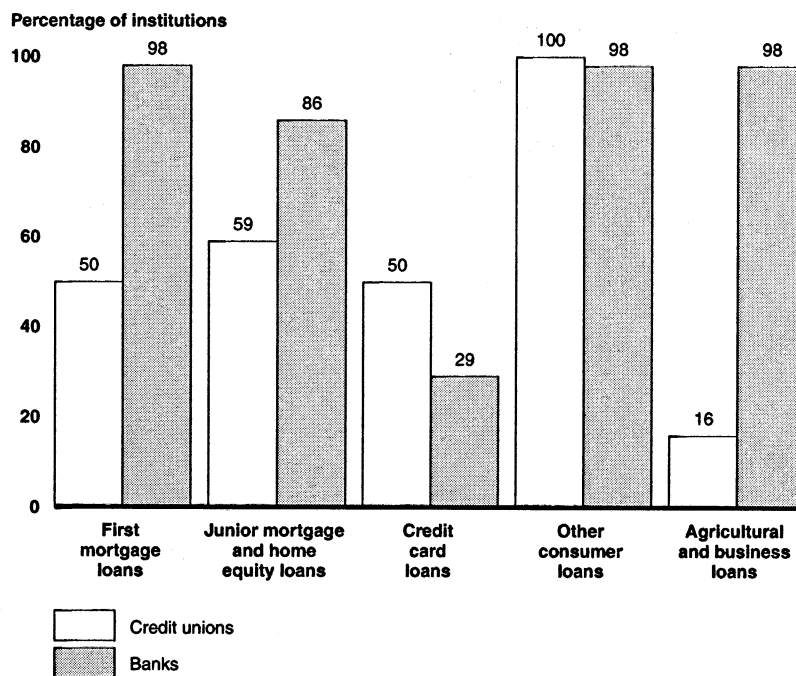
Given the disproportionate size of the banking industry relative to the credit union industry, peer groups were defined to mitigate the effects of this discrepancy. Therefore, for our more detailed reviews, we constructed five peer groups in terms of institution size as measured by total assets, reported as of December 31, 2002. We further refined the sample of FDIC-insured institutions to exclude those banks and thrifts we determined had emphases in credit card or mortgage loans. The largest bank included in our analyses had total assets of nearly \$18 billion in 2002. See appendix I for details.

Figures 24, 25, 26, and 27 illustrate that differences in services (as measured by the number of institutions holding various consumer, mortgage, and business loans) between credit unions and peer group banks

Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets

are manifested in terms of institution size. Overall, the credit union industry in aggregate did not appear to be that similar to the banking industry (as captured by our sample of peer group banks) in terms of services; however, when broken out by size, the larger credit unions (those with more than \$100 million in assets, or credit unions in Groups II, III, IV, and V) appeared to be offering very similar services to peer banks. Moreover, as nearly 90 percent of all credit unions had less than \$100 million in assets as of December 31, 2002, the results depicted in Figure 24 are influenced more heavily by these institutions.

Figure 24: Percentage of All Credit Unions and All Banks Holding Various Loans, as of 2002

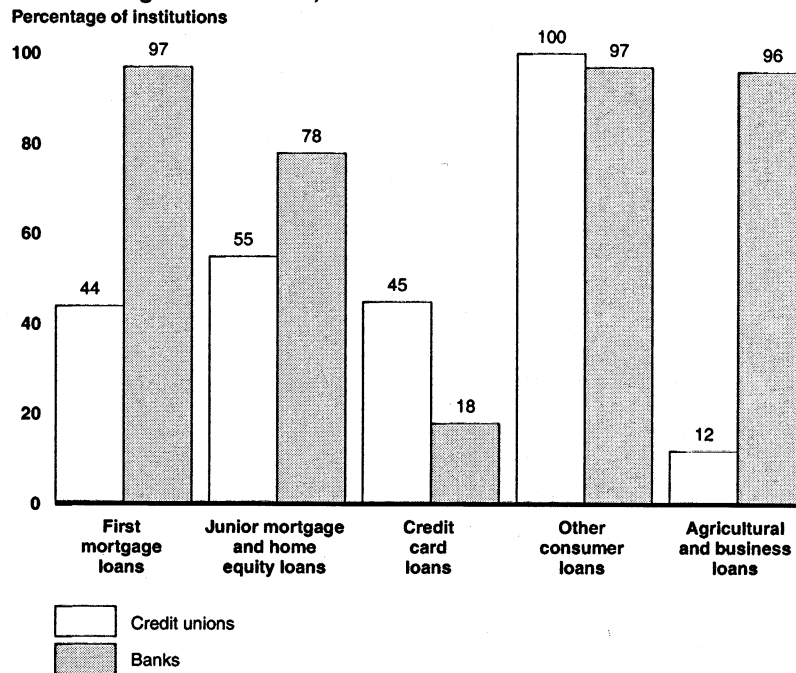


Source: Call report data.

Note: Data are as of December 31, 2002, and are based on all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions and banks we determined had emphases in credit card or mortgage loans are excluded. Bank data on mortgages exclude thrifts. Credit union data on other consumer loans may include member business and agricultural loans.

Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets

Figure 25: Percentage of Credit Unions and Banks with Assets of \$100 Million or Less Holding Various Loans, as of 2002

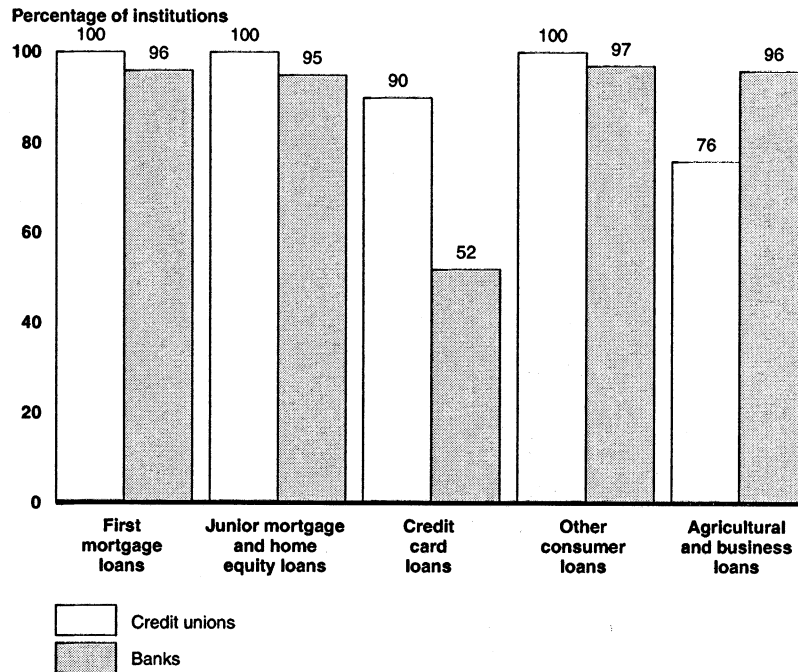


Source: Call report data.

Note: Data are as of December 31, 2002, and are based on all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions and banks we determined had emphases in credit card or mortgage loans are excluded. Bank data on mortgages exclude thrifts. Credit union data on other consumer loans may include member business and agricultural loans.

Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets

Figure 26: Percentage of Credit Unions and Banks with Assets between \$1 Billion and \$18 Billion Holding Various Loans, as of 2002





Source: Call report data.

Note: Data are as of December 31, 2002, and are based on all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions and banks we determined had emphases in credit card or mortgage loans are excluded. Bank data on mortgages exclude thrifts. Credit union data on other consumer loans may include member business and agricultural loans.

**Appendix IV
Comparison of Bank and Credit Union
Distribution of Assets**

Figure 27: Percentages of Credit Unions and Banks Holding Various Loans, by Institution Size, as of 2002

Group	Number	Total assets (dollars in billions)	Percentage of institutions with the following holdings:				
			First mortgage loans	Junior mortgage and home equity loans	Credit card loans	Other consumer loans	Agricultural and business loans
I	8,642	\$139.70	43.6%	54.5%	44.7%	99.9%	12.3%
	4,083	\$205.98	97.3%	77.6%	17.5%	97.5%	96.3%
II	602	\$93.57	97.2%	98.5%	91.7%	100%	43.5%
	2,086	\$327.96	98.9%	95.9%	35.7%	98.8%	97.4%
III	240	\$83.83	99.2%	98.3%	91.3%	100%	57.1%
	858	\$297.79	97.8%	96.9%	45.8%	98.1%	97.1%
IV	133	\$89.73	100%	99.2%	93.2%	100%	57.1%
	418	\$289.54	97.6%	97.6%	44.5%	98.1%	96.7%
V	71	\$150.24	100%	100%	90.1%	100%	76.1%
	384	\$1,399.98	96.2%	94.8%	51.8%	96.9%	95.8%
Total	9,688	\$557.07	49.5%	59.3%	49.8%	99.9%	16.4%
	7,829	\$2,521.25	97.7%	86.4%	28.6%	97.9%	97.5%

 Credit unions
 Banks

Source: Call report data.

Note: Data are as of December 31, 2002, and are based on all federally insured credit unions and banks and thrifts filing call reports. Insured U.S. branches of foreign-chartered institutions and banks we determined had emphases in credit card or mortgage loans are excluded. Bank data on mortgages exclude thrifts. Credit union data on other consumer loans may include member business and agricultural loans. Group I credit unions had assets of \$100 million or less; Group II credit unions had assets greater than \$100 million and less than or equal to \$250 million; Group III credit unions had assets greater than \$250 million and less than or equal to \$500 million; Group IV credit unions had assets greater than \$500 million and less than or equal to \$1 billion; and Group V credit unions had assets greater than \$1 billion and less than or equal to \$18 billion, which is the asset size, rounded up to the nearest billion dollars, of the largest credit union as of December 31, 2002.