

Comparison of Preliminary Findings of 5 Indirect Auto Lender Examinations

Institution	Identified Disparities (Siskin Method)	# of Affected PB Customers	Estimated Total Harm	FL Compliance Program	Notes
[REDACTED]	<p>Prime Channel: AA—9 bps Hispanic—16 bps</p> <p>Near-Prime Channel: AA—8 bps Hispanic—13 bps API—19 bps</p>	<p>Prime Channel: AA—[REDACTED] Hispanic—[REDACTED]</p> <p>Near-Prime Channel: AA—[REDACTED] Hispanic—[REDACTED] API—[REDACTED]</p>		No compliance program around markups; developed robust program to address dealer-level disparities, to be rolled out [REDACTED]	
Ally Financial	<p>Non-Subvented Loans: AA—15 bps Hispanic—15 bps API—15 bps</p> <p>Subvented Loans: AA—11 bps Hispanic—11 bps</p>	<p>Non-Subvented Loans: AA—[REDACTED] Hispanic—[REDACTED] API—[REDACTED]</p> <p>Subvented Loans¹: AA—[REDACTED] Hispanic—[REDACTED]</p>		No compliance program around markups; may be implementing program currently, but details have been withheld.	
[REDACTED]	<p>Remediated Disparities²: AA—11 to 18 bps Hispanic—10 to 26 bps</p>	<p>Sum across all years: AA—[REDACTED] Hispanic—[REDACTED]</p>			

¹ Subvented loans for which the buy rate offered is equal to zero.

² These are estimated using loans under the markup policy. Separate estimates are obtained for each calendar year (2008 through 2011). Range identifies lowest and highest annual estimate.

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<p>[REDACTED]</p>	<p>Dealer Prime: AA—9 bps Hisp—11 bps</p>	<p>Dealer Prime: AA—[REDACTED] Hisp—[REDACTED]</p>		<p>Dealer-level monitoring program in place for both underwriting and pricing, with changes over time. Program has several weaknesses, including only overall analysis and [REDACTED]</p>	
<p>[REDACTED]³</p>	<p>AA—16 to 20 bps⁴ Hisp—27 bps API—9 to 12 bps</p>	<p>Sum across all years: AA—[REDACTED] Hisp—[REDACTED] API—[REDACTED]</p>		<p>Dealer-level compliance program in place since [REDACTED] with some changes over time. Program has several weaknesses, including 25 bps threshold and the fact that corrective action is limited to dealer meetings and warnings.</p>	

³ Examination to occur in March. Therefore, these estimates are more preliminary than those for the other institutions.

⁴ Separate estimates are obtained for each calendar year (2010 and 2011). Range identifies lowest and highest annual estimate.