

Economics

14 May 2012 | 20 pages

Empirical and Thematic Perspectives

Fiscal Deleveraging, Financial Repression, and Central Bank Independence—Lessons from the U.S. Experience after World War II

- In the years after World War II, the United States achieved a dramatic fiscal deleveraging. The debt of the federal government declined from a peak of nearly 110 percent of GDP in 1946 to just 45 percent of GDP in 1960. In this essay, we draw on this experience to consider some potential interactions between fiscal deleveraging and monetary exit. Specifically, could governments' efforts to manage heavy public debt burdens meaningfully constrain central banks' efforts to exit from their highly stimulative policies?
- The sharp decline in the U.S. government debt burden during the post-war period was driven by several factors. First, real GDP growth boomed in the decade after World War II, which significantly increased the economy's capacity to service the debt. Second, the price level surged immediately after the war, as wage and price controls were lifted, and this accordingly reduced the real value of the debt. Third, the government ran an exceptionally disciplined fiscal policy—even including the financing for the Korean War, the budget was typically in balance. The current generation of politicians would learn much from an examination of this episode.
- Until the Treasury-Fed "Accord" of March 1951, the Federal Reserve actively supported this deleveraging process through a policy of maintaining long-term Treasury yields at rates of 2½ percent or lower. Through this mechanism, the Federal Reserve was complicit with the government in a policy of financial repression. Specifically, the second half of the 1940s saw sharply negative real yields on government securities, which implied a significant transfer of resources from savers (the private sector) to borrowers (mainly the public sector).
- The Fed worried that inflationary forces might take hold in a sustained way but remained hesitant to raise interest rates. During the second half of the 1940s, Federal Reserve officials cited concerns that rate hikes would raise the government's debt-service burden and potentially destabilize the Treasury market. The Fed also doubted that it had sufficient support within the political process to begin hiking rates. Compounding this hesitance, the prevailing view within the Fed was that higher interest rates could only restrain activity if those rate increases were large and likely disruptive.
- This episode highlights the pressures that may be brought to bear on central banks as they contemplate an exit from exceptionally stimulative policies, especially in situations where the government's debt is elevated. Relative to the 1940s, broad understandings of the nature and importance of central bank independence—and the role that monetary policy can play in ensuring favorable economic outcomes—have evolved significantly. This stronger intellectual framework provides some protection against a replay of events after World War II. Even so, the post-war experience represents an important cautionary tale that merits careful consideration.

Global Head of International Economics

Nathan Sheets

+1-212-816-9297
nathan.sheets@citi.com

Peter D'Antonio

+1-212-816-9889
peter.dantonio@citi.com

Robert A Sockin

robert.andrew.sockin@citi.com

See Appendix A-1 for Analyst Certification, Important Disclosures and non-US research analyst disclosures.

Citi Investment Research & Analysis is a division of Citigroup Global Markets Inc. (the "Firm"), which does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that the Firm may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decision.

Fiscal Deleveraging, Financial Repression, and Central Bank Independence—Lessons from the U.S. Experience after World War II

We focus in this essay on the U.S. experience with public debt deleveraging in the years immediately following World War II. We find this episode helpful in thinking through the challenges that governments around the world are likely to face in the years ahead, as they seek to manage the sizable debt burdens amassed since the global financial crisis erupted in mid-2007. This period is also instructive in framing the related challenges that central banks may encounter as they begin to unwind the extraordinary monetary stimulus put in place to fight the crisis. We draw on this historical experience to consider the deeper interactions between fiscal deleveraging on the one hand and monetary exit on the other. Specifically, could governments' efforts to manage heavy public debt burdens materially constrain central banks' efforts to exit from highly stimulative policies and sizable balance sheets?

Our key conclusions are that the post-war U.S. fiscal deleveraging relied crucially on three pillars—first, a burst of inflation in the years immediately after the war, which significantly reduced the real value of the debt; second, starting particularly in the early 1950s, rapid real GDP growth that increased the economy's capacity to service the debt; and third, an exceptionally disciplined fiscal policy. In a forthcoming essay, we will extrapolate these lessons to discuss the prospects for U.S. fiscal deleveraging in the current episode. But for now, suffice it to say that we are doubtful that any of these factors is likely to be in play in any significant way: The Fed remains firmly committed to keeping inflation in check; growth in the coming decade is unlikely to match that in the 1950s; and fiscal discipline is clearly a lower priority objective for the current generation of U.S. politicians than was the case for their predecessors of sixty years ago.

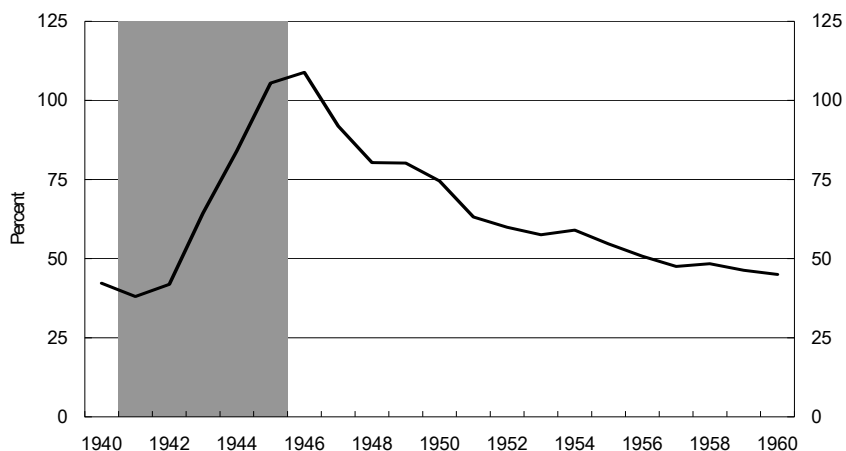
The post-war episode also sheds light on some channels through which a sizable public debt—and political pressures—may constrain and complicate a central bank's exit following a period of exceptional accommodation. After World War II, it took the Fed more than five years to normalize the stance of policy and remove its ceilings on long-term Treasury yields. The upshot was that the Fed was complicit with the Treasury in a policy of financial repression. The Fed's lagging response through this period reflected a number of factors, importantly including pressures from the Treasury to keep rates low and worries inside the Fed that higher interest rates would push up the Treasury's debt service costs and destabilize the government securities market. We fully expect that the Federal Reserve and other central banks will assert their independence more vigorously during the current period than was the case in the late 1940s. But, even so, the experience during this earlier period is an important cautionary tale.

U.S. Fiscal Deleveraging in the Post-War Period

Figure 1 shows the evolution of the debt of the U.S. federal government through the 1940s and 1950s. Notably, the United States entered World War II with a ratio of debt to GDP of roughly 40 percent. Through the years of the war, the debt surged upward, peaking at close to 110 percent of GDP in 1946. Following the war, the debt ratio declined sharply, falling to about 80 percent of GDP in 1948. And the debt continued to decline through the following decade, moving below 50 percent of GDP by 1957.

We now explore how this remarkably rapid fiscal deleveraging was achieved. Specifically, by definition, the debt-to-GDP ratio reflects the evolution of the nominal level of the debt, the price level, and the level of real GDP. In this section, we examine how each of these variables moved during the early post-war period and discuss their relative contributions to the deleveraging process.

Figure 1. Federal Government Debt (share of GDP)*



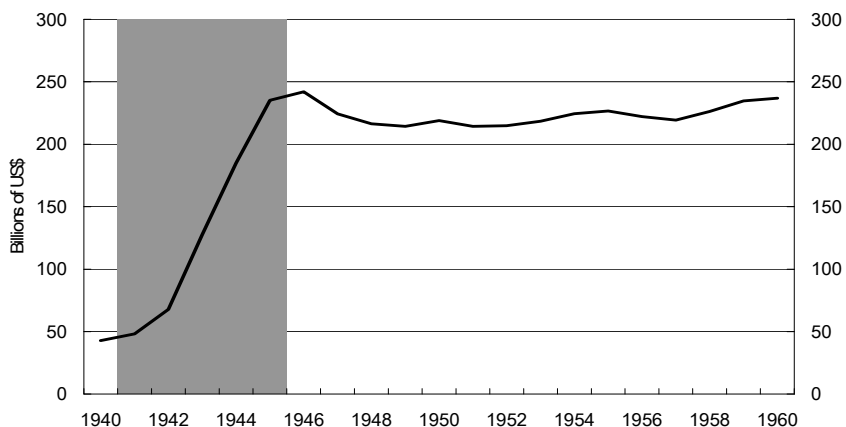
*Debt held by public. Note: Shaded region denotes World War II.

Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Nominal debt. Like the debt-to-GDP ratio, the level of the nominal debt (Figure 2) peaked in 1946, at slightly over \$240 billion. This represented a more than five-fold increase relative to the level that prevailed before the war. In the years immediately after the war, the debt actually declined in nominal terms, troughing at below \$220 billion in the late 1940s and early 1950s. The debt then remained essentially flat in dollar terms through the late 1950s.

The evolution of the nominal debt reflected an extraordinarily disciplined fiscal policy. During this period, a strong social and political consensus prevailed in favor of budgetary restraint and intensive efforts to reduce the debt burden. As shown in Figure 3, the overall federal budget registered a meaningful surplus in 1947 and 1948 and, thereafter, cycled near balance. With the interest burden running at around 1½ percent of GDP on average through this period, the primary balance was in sustained surplus. However, as we will discuss below, the budget also benefited significantly from the Fed's willingness to maintain interest rates at very low levels.

Figure 2. Federal Government Nominal Debt



Sources: *Historical Statistics of the United States, Colonial Times to 1970* and Haver Analytics.

Figure 3(a). Federal Government Deficit

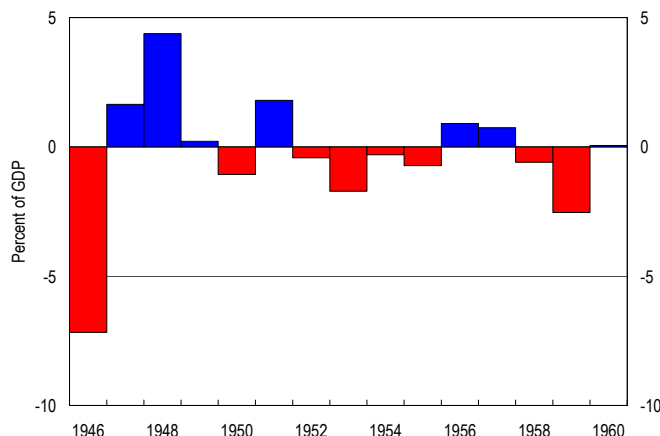
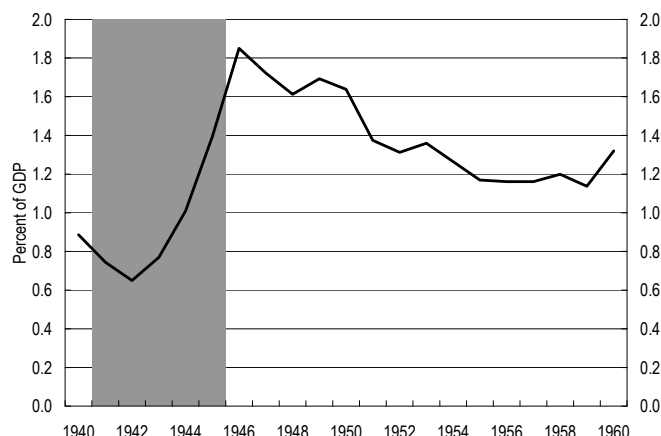


Figure 3(b). Federal Government Interest Payments

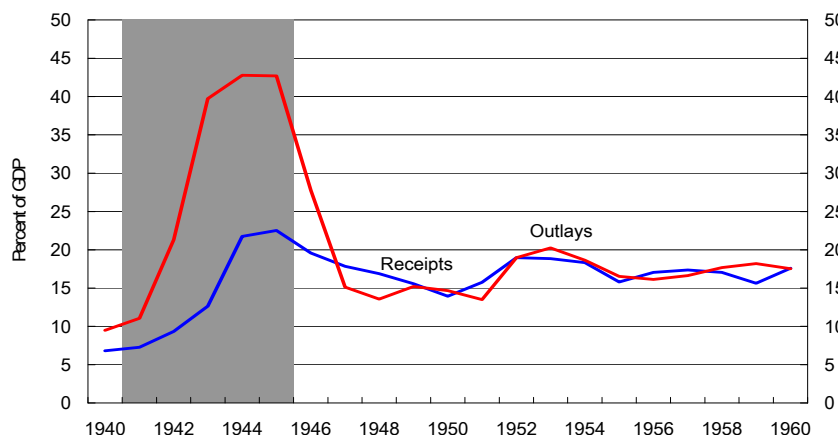


Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Office of Management and Budget, Haver Analytics, and Citi Investment Research and Analysis.

Figure 4 shows government receipts and outlays. During the war, government expenditures exceeded 40 percent of GDP, but fell rapidly to 15 percent of GDP in 1947 with the winding down of military efforts. Notably, from 1952 to 1954, receipts and outlays both bumped up to near 20 percent of GDP, reflecting the fiscal costs of the Korean War. But the government funded the military action drawing on current revenues, without resorting to additional debt financing.

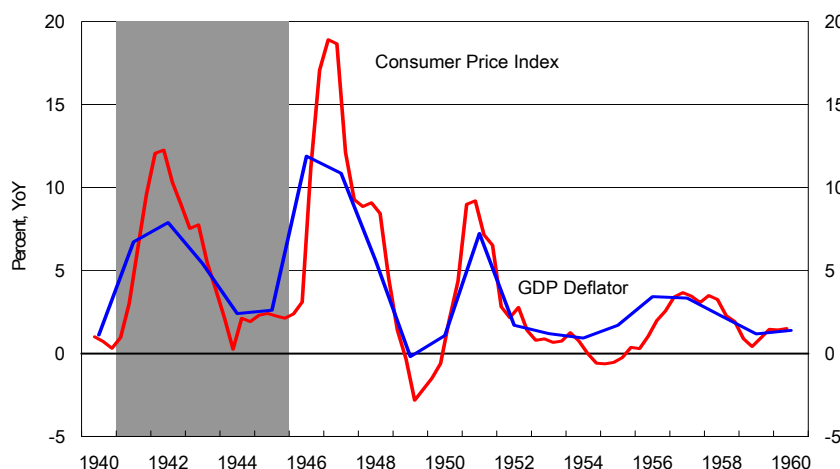
Inflation. Figure 5 highlights the remarkably volatile path of U.S. inflation during the years immediately after World War II. Notably, during the war years, the government had sought to maintain price stability through the imposition of wage and price controls. After the war, as these controls were dismantled, the price level surged upward. Notably, consumer price inflation averaged 10 percent annually from 1946 to 1948, before falling off in 1949 and 1950. Inflation jumped up again in 1951, to over 7 percent, reflecting uncertainties associated with the onset of the Korean War, but declined sharply in 1952 and remained relatively muted through the remainder of the decade. All told, CPI inflation averaged about 6½ percent annually from 1946-51; thereafter, inflation moved down to near 1½ percent on average through the rest of the 1950s.

Figure 4. Federal Government Outlays and Receipts



Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Figure 5. US Inflation Rate

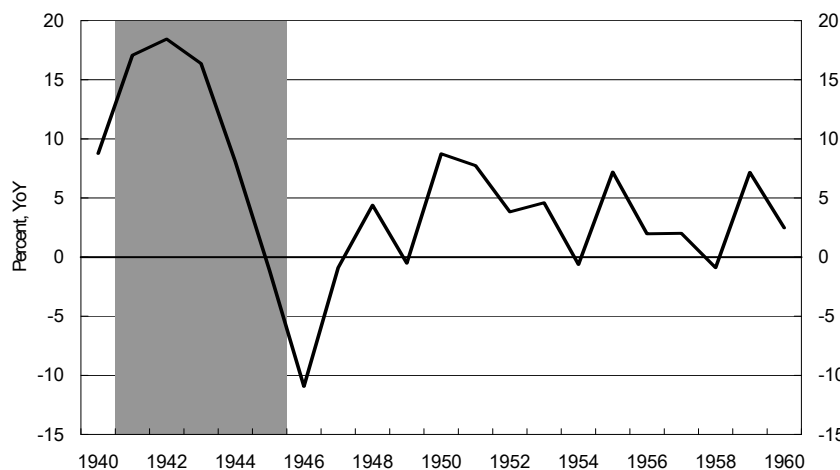


Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Real GDP growth. Figure 6 shows the path of U.S. real GDP growth after World War II. As we noted above, government spending rapidly declined in the aftermath of the war, and real GDP accordingly contracted more than 10 percent in 1946 and slightly further in 1947. There was significant concern during these years that the sharp decline in federal spending and the demobilization of the military would result in recession and sharply rising unemployment. But, in the event, the economy was quickly transformed into peace-time production, with real GDP growth exceeding 4 percent in 1948 and then moving into significant expansion beginning in 1950.

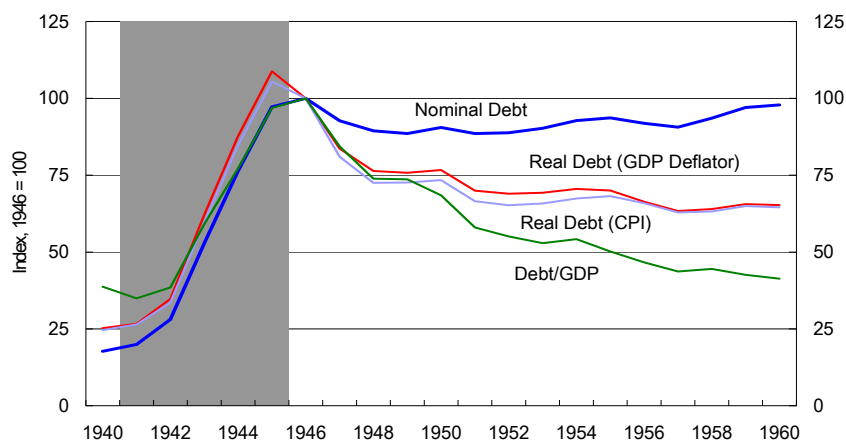
How do these pieces fit together? We now seek to integrate these developments into a common framework. Figure 7 displays three key variables—each indexed to equal 100 in 1946: (1) Nominal debt; (2) Real debt (the nominal debt divided by the price level); and (3) The debt-to-GDP ratio (the nominal debt divided by nominal GDP, which in turn is equal to the real debt divided by real GDP). As such, the difference between the nominal debt and the real debt can be interpreted as the

Figure 6. U.S. Real GDP Growth



Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Figure 7. Measures of Federal Government Debt



Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

contribution to deleveraging coming from the rising price level, while the difference between the real debt and the overall debt-to-GDP ratio is the contribution from real GDP growth.

The figure highlights that by 1948 the debt had already fallen sharply relative to nominal GDP, reflecting both disciplined fiscal policies (which drove a decline in the nominal debt) and the surge in prices that followed the dismantling of wage and price controls. By 1950, however, U.S. real GDP growth was revving up. And the decline in the debt-to-GDP ratio thereafter largely reflected the solid expansion of real GDP.

Table 1 provides a complementary perspective on these data. Notably, from 1946 through 1948, the debt to GDP ratio dropped by a remarkable 29 percentage points. This decline reflected in roughly equal measure, the decline in the level of the nominal debt and the upward surge in the price level, with relatively little contribution from real GDP. From 1948 to 1960, the debt to GDP ratio fell by another 35 percentage points. This move down was mainly due to strong GDP growth, with the rising price level playing a secondary role and the nominal debt actually rising slightly. For the 1946-60 period as a whole, the debt to GDP ratio dropped by a stunning 64 percentage points, with rising real GDP and higher prices each contributing nearly 30 percentage points to the overall decline, and a small net decline in the nominal debt level also supporting the downward adjustment.

Table 1. Factors Affecting Federal Government Debt Burden

	<u>1946-48</u>	<u>1948-60</u>	<u>1946-60</u>
		(percentage points)	
(1) Change in Debt to GDP Ratio	-29	-35	-64
<i>Contributions from Changes in:</i>			
(2) Nominal Debt	-11	+5	-6
(3) Real GDP	-3	-26	-29
(4) GDP Deflator	-15	-14	-29

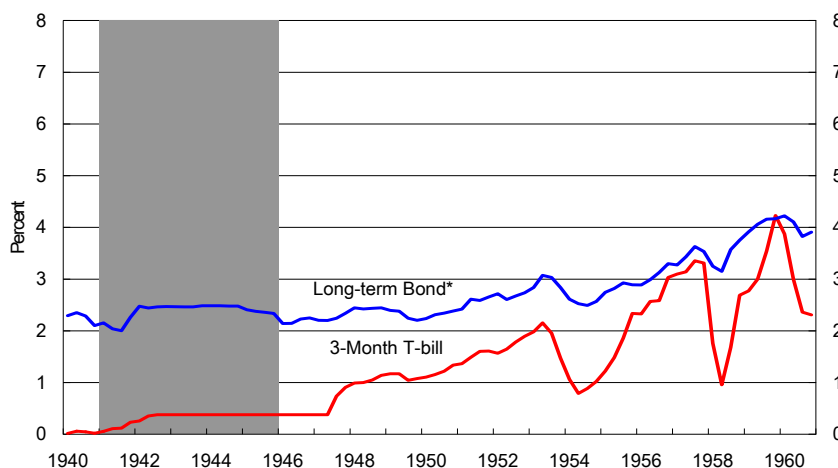
Source: Citi Investment Research and Analysis.

We note that these decompositions probably understate the crucial role that fiscal discipline played in generating the decline in the debt. From 1946 to 1960, real GDP growth and inflation (as measured by the GDP deflator) both averaged around 3 percent a year. If instead, these variables had averaged 2 percent annually, similar to what the U.S. economy might expect over the next 10 or 15 years, the debt to GDP ratio would still have fallen by more than 40 percentage points. As such, in our view, a central—and extraordinary—element of the deleveraging that occurred during this period was the tight fiscal policies that prevented the nominal level of the debt from rising. Indeed, the nominal level of the government's debt in 1960 remained below that in 1946.

How Did the Fed Support Fiscal Deleveraging?

Throughout the war, the Fed dutifully supported the government's debt issuance and fiscal management objectives by holding down the level of the yield curve.¹ From April 1942, the Fed promised the Treasury that the rate on 90-day bills would not exceed 0.375 percent and that the rate on long-term Treasuries would not exceed 2½ percent (Figure 8). At these posted rates, banks found the return on bonds much more attractive than the return on bills and, accordingly, sold bills and bought bonds on a sustained basis. The upshot was that the Fed was forced to buy huge quantities of bills to keep the short-end of the yield curve from rising. The inflationary effects of the resulting money creation were curtailed by wage and price controls.

Figure 8. Nominal Treasury Yields



*Unweighted average of all issues outstanding of bonds neither due nor callable in less than 10 years.

Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Following the war, the Federal Reserve worried that inflationary forces might take hold in a sustained way but was also hesitant to back away from its ceilings on interest rates. (This hesitance reflected a number of factors that we will discuss in detail below.) Accordingly, the upward limit on bill yields remained in place until July 1947, nearly two years after the end of the war.

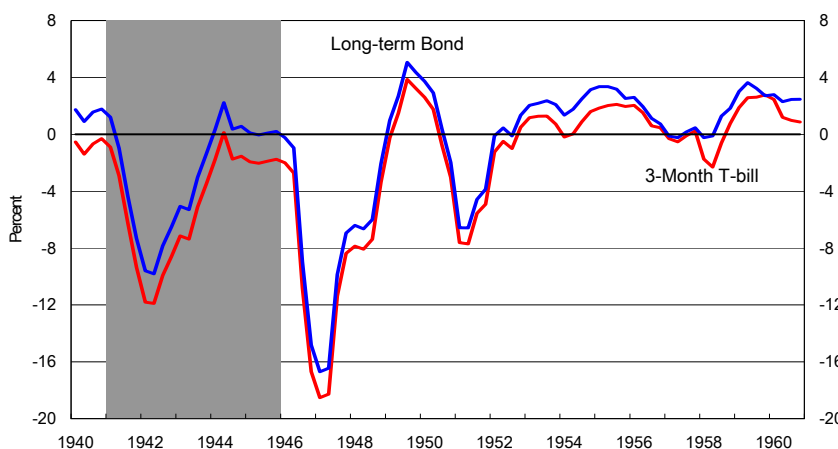
Moving away from the ceiling on long-term interest rates was seen as a much more consequential step and did not come until the Treasury-Fed "Accord" in March

¹ This section and the following section draw heavily on Allan Meltzer's authoritative discussion of this period in *A History of the Federal Reserve, Vol 1*, 2003.

1951. Notably, however, even with the surge of inflation in the years immediately after the war, maintaining the long-term rate below the ceiling did not typically require active intervention by the Federal Reserve. And after the removal of the ceiling, long-term rates moved up only gradually. This suggests that, following the deflationary travails of the Great Depression and the wage and price controls of World War II, inflation expectations were very well anchored. The public apparently looked at the surge of inflation as a one-off (and unavoidable) transition from the wartime economy to a peacetime economy. This perception was no doubt reinforced by the government's highly disciplined fiscal policies. However, a less desirable factor may have also been at work: Given the relatively limited development of financial markets at the time, investors may have seen few alternatives to continuing to hold long-term Treasuries. (We will address this issue in the next section.)

In any event, negative real interest rates were a prominent feature of the financial landscape during the 1940s (see Figure 9). From 1941-51, the average real rate on 90-day government bills was $-5\frac{1}{4}$ percent, and the average rate on the government's long-term debt was $-3\frac{1}{2}$ percent.² These negative real rates resulted in a significant transfer from savers (the private sector) to borrowers (mainly the government).

Figure 9. Real Treasury Yields*



*The 3-month (long-term) real yield is the nominal 3-month (long-term) yield shown in Figure 8 minus the inflation rate, measured by the 4-quarter percent change in the Consumer Price Index, as seen in Figure 5.
Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Financial Repression. Carmen Reinhart and various co-authors have termed government policies used to achieve redistribution through such channels “financial repression.”³ While financial repression may be achieved through a range of policies—including by capping interest rates, restricting competition in the financial sector, or introducing capital controls—the key underlying objective is to induce

² Here we consider a very simple measure of *ex post* real interest rates—the yield on a given government security at a point in time minus the lagged four-quarter percent change in consumer prices. While an array of more sophisticated measures of real interest rates could be explored, the general observation that the holders of U.S. government debt through this period took losses in price-adjusted terms strikes us as robust.

³ See, for example, J. Kirkegaard and C. Reinhart, “Financial Repression: Then and Now,” VOX, March 26, 2012; also, C. Reinhart and B. Sbrancia, “The Liquidation of Government Debt,” NBER Working Paper 16893, March 2011.

financial institutions and other investors to hold government debt at yields lower than would otherwise prevail. As a practical matter, negative real interest rates—such as those observed in the United States and many other countries during the 1940s—are one defining feature of periods of financial repression.

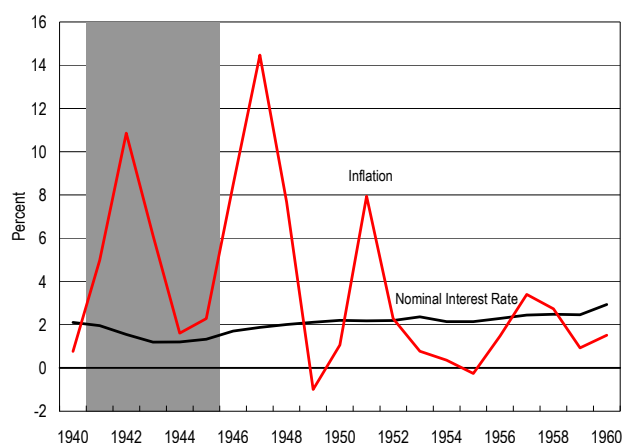
Figure 10 seeks to quantify these effects for the United States after World War II. The left panel highlights that the effective interest rate that the government paid on its debt (i.e., actual interest payments relative to the stock of debt outstanding) typically ran well below inflation through most of the 1940s.

In the right panel, we consider the following question: How would the debt-to-GDP ratio have evolved if—in the absence of financial repression—market forces had required the government to pay an interest rate on its outstanding debt that was consistently 2 percentage points higher than inflation? We find (as shown by the dashed line) that under such assumptions, the debt to GDP ratio would have declined but would have ended the period at 70 percent of GDP, a full 25 percent of GDP higher than was actually achieved.⁴ Even if the effective interest rate had on average been just equal to inflation, the path of the debt to GDP ratio would have been noticeably higher (shown by the dotted line). Accordingly, this evidence suggests that financial repression should be added to the list of policies that the U.S. authorities used in the post-war period to support their deleveraging efforts, with the Fed's policies of pegging government securities yields playing a central role.

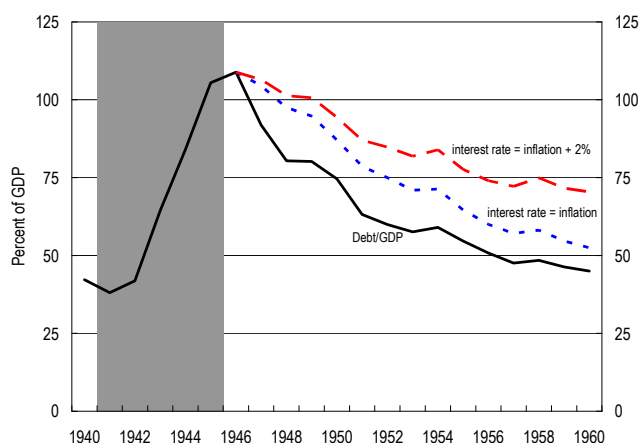
This discussion of financial repression should be qualified in one important respect, however. As highlighted in Figure 11, one characteristic of the Federal Reserve's interest rate policies through these years was that, although interest rates were

Figure 10.

Effective Interest Rate on Federal Government Debt*



Counterfactual Paths for Federal Government Debt



*Calculated as federal interest payments divided by debt outstanding; inflation is annual change in Consumer Price Index.

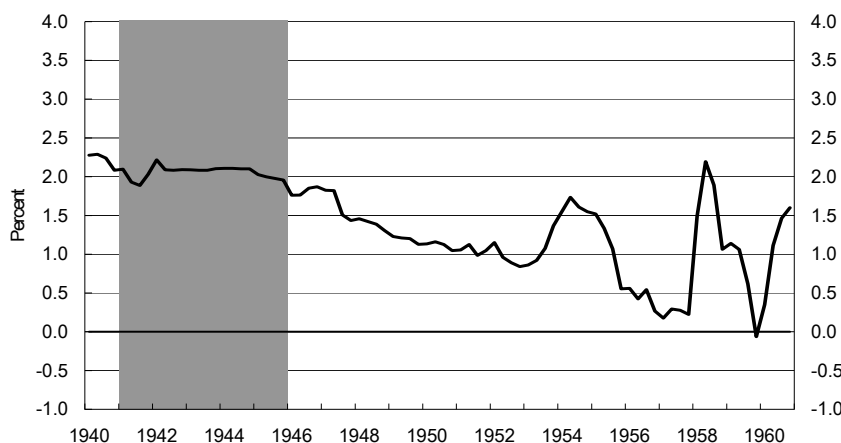
Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Office of Management and Budget, Haver Analytics, and Citi Investment Research and Analysis.

⁴ Specifically, this is the counterfactual path that would have prevailed if the government had paid a rate of interest on its debt stock equal to the annual inflation rate plus 2 percent. That said, this does not necessarily correspond to the path of government interest costs that would have prevailed if the Fed had immediately liberalized interest rates after the war, given that only a fraction of the debt matured and needed to be re-issued at prevailing rates in any given year.

regulated, the yield curve was consistently upward sloping. The long rate exceeded the short rate by roughly 2 percentage points on average through the war years, but gradually closed to a spread of roughly 1 percentage point through the early-1950s. As such, banks faced an upward sloping yield curve as they borrowed short and lent long, which gave them ample opportunities to remain profitable. Indeed, as we note below, Marriner Eccles—Chairman of the Fed from 1934 to 1948—complained about the high level of bank profits through the 1940s. As such, the financial repression was ultimately more a repression of those that were net savers (e.g., households) than of institutions that were engaged in borrowing short and lending long.

Through the 1950s, with the eventual normalization of the Federal Reserve's policy stance and the freeing up of the government securities market, real interest rates moved into positive territory. From 1952 to 1960, the real 90-day bill rate averaged $\frac{3}{4}$ percent and the real rate on long-term Treasuries averaged $1\frac{3}{4}$ percent.

Figure 11. Slope of the Yield Curve*



*Slope of yield curve is yield on long-term bond minus yield on 3-month T-bill.

Sources: *Historical Statistics of the United States, Colonial Times to 1970*, Haver Analytics, and Citi Investment Research and Analysis.

Why Was the Fed Slow to Normalize Interest Rates after the War?

As outlined in Meltzer (2003), the Fed's reluctance in the years after the war to normalize its policies and deregulate interest rates appears to have reflected three key factors:

- First, the Treasury exerted intense pressures to keep these policies in place; and, as a closely related matter, the Federal Reserve worried that that rate hikes might trigger instability in the government securities markets.
- Second, the Fed was operating with fundamental intellectual misunderstandings about how rate hikes would influence the economy and about the nature of inflationary processes.
- Third, the Fed's views of central bank independence—including its relationships to other government agencies and its responsibilities within the government—were significantly weaker than is the case today, and independence was seen as less of a central priority.

We will now flesh out these three issues and consider their implications for central banks in the current episode.

Political Pressures. In congressional testimony in February 1946, Federal Reserve Chairman Marriner Eccles marshaled the following remarkable arguments to explain his reluctance to raise interest rates in the face of what he perceived were mounting inflationary pressures:

It would be quite unsatisfactory, it seems to me, to try to meet the present problem by what was considered the usual or the orthodox way of dealing with inflationary forces, which was through increasing the discount rate, raising interest rates. Now, the reason for not following this course is that it would increase the cost of carrying the public debt, which is already very high, and it would likewise increase the earnings of the banking system which are also high. Such a policy would be a very unsatisfactory way to deal with this problem. I am sure that the Treasury would have considerable objection, as Congress and the public would, to increasing the interest burden on the Federal debt for the benefit of the banking system.⁵

To modern ears, this line of reasoning seems extraordinary indeed. The striking point is not Eccles' hesitancy to hike rates, but rather his rationale—worries that rate hikes would increase the government's debt-service burden and be opposed by the Treasury, the Congress, and the public.

Over time, the Fed's rationale for pegging interest rates evolved somewhat. In August 1948, Thomas McCabe—who by then had succeeded Eccles as Fed Chairman—continued the Fed's defense of the 2½ percent ceiling on long-term Treasury yields. McCabe admitted that this ceiling at times created challenges for controlling inflation, but he argued that the ceiling was necessary to “insure orderly conditions” in the government securities market, “not primarily because of an implied commitment to wartime investors that their savings would be protected, not to aid the Treasury in refunding maturing debt, but because of the widespread repercussions that would ensue . . . if the vast holdings of public debt were felt to be of unstable value.”⁶

The Federal Reserve's experience through this period serves as an important cautionary tale for central banks in the current episode, highlighting the political and other pressures that may complicate central bank exit strategies. The decision regarding the timing of the exit is unlikely to be straight-forward or obvious. Worries about the underlying strength of the economy, concerns about the implications for financial stability and fiscal sustainability, and even direct political pressures may seem to argue against tightening moves. Even so, our expectation is that the current generation of central bankers will pursue policies consistent with their core mandates. That said, the Fed's experience during the post-war period gives us pause and hints that the process of exiting from exceptional policies may be just as complicated and challenging as the process of putting these policies in place.

Intellectual Framework. The Fed's response during this period was also hobbled by an incomplete and—in certain respects—inaccurate view of the monetary policy

⁵ House Committee on Banking and Currency, 1946, Extension of the Emergency Price Control and Stabilization Acts of 1942, as amended. This quote, as well as the quotes referenced in footnotes 6 through 10 below, is taken from Allan Meltzer's, *A History of the Federal Reserve*, Vol 1, 2003.

⁶ House Committee on Banking and Currency, 1948, Inflation Control.

transmission mechanism and the factors that drive inflation. In short, the Fed was convinced that interest rate hikes could only restrain economic activity if those hikes were large and disruptive. Chairman Eccles argued that “a moderate rise in yields on government securities would not prevent and would only slightly restrain banks from selling securities in order to make loans.” In contrast, an “attempt to force up rates to levels that would be effectively restrictive on private borrowing” would have “disastrous consequences,” including sizable losses to banks and other holders of government debt.⁷

The prevailing view at the Fed was that shifts in the stance of fiscal policy would have a much more powerful effect on spending than rate hikes and, as such, that further fiscal tightening was the key for restraining the strengthening economy. On this point, Eccles observed that “it was not possible by any practicable means, except higher taxes, to contract either current income or accumulated buying power.” The Federal Reserve thus resisted pressures to lift interest rates and instead espoused a set of other measures, including raising reserve requirements, compelling banks to hold a secondary reserve of Treasury bills, and establishing temporary credit controls. The Fed also encouraged the government to raise taxes.

Central banks today are supported by a better understanding of the drivers of inflation and the linkages between interest rates and real activity. This gives us some confidence that the mistakes of the 1940s will not be repeated. In particular, central banks around the world realize the importance of hiking rates as recoveries take hold. But a whole range of other conceptual issues cannot be so easily dismissed. For example, when is the right time for central banks to begin their exits from highly stimulative policies? What liquidity tools are necessary for central banks to successfully manage their bulging balance sheets through the exit process? How can communications strategies best support the winding up of balance sheets? And will there be any persistent unintended consequences from unconventional policies? Such questions are of vital importance and, again, push central banks—and the economics profession—to the intellectual frontier. We are hopeful that central banks will get the answers to these questions right—and gear their policies accordingly—but in a very real sense monetary policy is in uncharted territory.

Views of Central Bank Independence. The notions of central bank independence that prevailed in the period immediately after World War II were incomplete and murky. As a result, the Federal Reserve was vulnerable to domination from the Treasury and the government more generally.

Consistent with this observation, Marriner Eccles in 1942 put forward a working definition of central bank independence that might apply with equal relevance to any agency of the government: “The kind of independence a central bank should have was an opportunity to express its views in connection with the determination of policy, and that after it had been heard it should not try to make its will prevail but should cooperate in carrying out the program agreed upon by the Government.”⁸

Later in the 1940s, Allan Sproul, who was then the President of the Federal Reserve Bank of New York, articulated the following somewhat richer perspective:

I don’t suppose that anyone would still argue that the central banking system should be independent of the Government of the country. The control which such a system exercises, over the volume and value of

⁷ Quotations in this paragraph and the next paragraph come from M. Eccles, *Beckoning Frontiers: Public and Personal Reflections*, 1951; and Board Minutes, May 28, 1947.

⁸ Board Minutes, February 3, 1942.

money is a right of Government, and is exercised on behalf of Government, with powers delegated by the Government. But there is a distinction between independence from Government and independence from political influence in a narrower sense. The powers of the central banking system should not be the pawn of any group or faction or party, or even any particular administration, subject to political pressures and its own passing fiscal necessities.⁹

The idea that the central bank should be independent of narrow political pressures is indeed a pillar of current notions of central bank independence. But what is lacking from this discussion is the concept of a core mandate for price stability, and the need for operational latitude to achieve that mandate. The lack of an anchoring mandate left the Federal Reserve in the 1940s vulnerable to being pushed and prodded toward achieving a range of other objectives, including minimizing the government's debt service burden and ensuring the stability of the Treasury market.

The Fed's vulnerability as it sought to achieve these multiple objectives was starkly exposed in congressional testimony in 1948. In a House hearing, Chairman McCabe affirmed the Federal Reserve's intention to continue to support the Treasury market for the "foreseeable future." The chairman of the House Committee then pinned McCabe by asking, "Are you saying that it is necessary to continue inflation to carry the national debt?" McCabe responded weakly, "I would not like to put it that way, sir."

Later in the hearing, in an even more remarkable exchange, McCabe almost encouraged Congress to take responsibility for formulating the direction of monetary policy: "If it is the wisdom of this Congress that the Federal Reserve should not support the Government bond market, then I think Congress should so direct the Federal Reserve." The chairman of the Committee aptly placed this responsibility back squarely on the shoulders of the Fed Chairman, responding, "I do not think that we are going to direct you not to support the government bond market. [But] I do not think that we are going to direct you to support the Government bond market at a particular figure."¹⁰

This discussion highlights some important lessons for central banks. First, a simple and clear core mandate is a crucial feature of central bank independence. If the central bank stretches to achieve too many objectives—to be all things to all people—it becomes hamstrung and politically vulnerable. The Fed of the 1940s was clearly trying to achieve too many objectives at once. Second, central bank communications should continue to emphasize how the current stance of monetary policy is being shaped by core mandates and objectives. By framing communications in this way, the decision to exit will be a natural outgrowth of previous actions and thinking. Such continuity in communications may also limit any disruptions in financial markets at the time of exit. Third, and as a corollary, this discussion highlights the value of transparency in explaining monetary policy decisions. It becomes difficult for the government to pressure the decisions of a transparent central bank, since the government's fingerprints will be readily seen.

A final caveat from this period is that the Fed's subjugated role largely grew out of the warm relationship between the Fed and the Treasury that had prevailed during World War II as the two agencies worked together to help finance the government under exigent circumstances. These close relationships actually worked against the Fed's efforts to pursue an independent policy after the war. Similarly, central banks

⁹ Sproul Papers, September 1948.

¹⁰ House Committee on Banking and Currency, 1948, Inflation Control.

and finance ministries have worked closely in fighting the financial crisis in recent years. Central banks must take pains to ensure that these warm working relationships do not—however subtly—impede their scope for tough and independent action when the time to exit comes.

Some Concluding Thoughts

The experience of the United States in the period after World War II holds a number of rich lessons for policymakers in the current episode. On the one hand, the U.S. authorities during this period achieved a remarkably rapid deleveraging of the public debt. Federal debt plunged from just under 110 percent of GDP in 1946 to 45 percent of GDP in 1960. This decline in the debt ratio reflected the rapid real growth of the economy through this period, a surge of inflation in the years immediately after the war as wage and price controls were lifted, and a highly disciplined fiscal policy (even including the financing for the Korean War, the budget was typically in balance). In a forthcoming essay, we will draw on these lessons to think through the prospects for U.S. fiscal deleveraging in the current episode.

The Federal Reserve's experience during this period, however, represents a clear cautionary tale for central bankers today. Stated bluntly, the Fed during the years after the war became an instrument of the government's deleveraging efforts and complicit in a policy of financial repression. It took more than five years—and a new Fed Chairman—for the Federal Reserve to fully liberalize the government securities market. In retrospect, the lagging pace of the Fed's response after the war posed a significant downside risk to economic and financial stability. That such risks did not materialize largely reflects a confluence of other favorable factors—an economy poised to boom, the government's fiscal rectitude, and inflation expectations that were very well anchored (with the experience of the Great Depression only ten-years distant). In addition, it could be argued that had economic events been less favorable, the Federal Reserve might very well have asserted its independence more quickly and aggressively. Nevertheless, given the government's dominance of the central bank, economic performance through this period could have evolved much less favorably.

The post-war episode also highlights the intensive pressures that may be brought to bear on central banks as they contemplate an exit from exceptionally stimulative policies, especially in an environment in which the government's debt is elevated. Central banks will need to remain intensively focused on their core mandates and not become distracted by other objectives or political pressures. Over the past sixty years, broad understandings of the nature and importance of central bank independence—and the role that monetary policy can play in ensuring favorable economic performance—have evolved significantly. This stronger intellectual framework provides meaningful protection against a replay of events after World War II. Even so, with monetary policy now in largely uncharted territory, we believe that the lessons from this period merit careful and ongoing consideration.

Notes

Notes

Appendix A-1

Analyst Certification

The research analyst(s) primarily responsible for the preparation and content of this research report are named in bold text in the author block at the front of the product except for those sections where an analyst's name appears in bold alongside content which is attributable to that analyst. Each of these analyst(s) certify, with respect to the section(s) of the report for which they are responsible, that the views expressed therein accurately reflect their personal views about each issuer and security referenced and were prepared in an independent manner, including with respect to Citigroup Global Markets Inc and its affiliates. No part of the research analyst's compensation was, is, or will be, directly or indirectly, related to the specific recommendation(s) or view(s) expressed by that research analyst in this report.

IMPORTANT DISCLOSURES

Analysts' compensation is determined based upon activities and services intended to benefit the investor clients of Citigroup Global Markets Inc. and its affiliates ("the Firm"). Like all Firm employees, analysts receive compensation that is impacted by overall firm profitability which includes investment banking revenues.

For important disclosures (including copies of historical disclosures) regarding the companies that are the subject of this Citi Investment Research & Analysis product ("the Product"), please contact Citi Investment Research & Analysis, 388 Greenwich Street, 28th Floor, New York, NY, 10013, Attention: Legal/Compliance [E6WYB6412478]. In addition, the same important disclosures, with the exception of the Valuation and Risk assessments and historical disclosures, are contained on the Firm's disclosure website at https://www.citivelocity.com/cvr/epublic/citi_research_disclosures. Valuation and Risk assessments can be found in the text of the most recent research note/report regarding the subject company. Historical disclosures (for up to the past three years) will be provided upon request.

NON-US RESEARCH ANALYST DISCLOSURES

Non-US research analysts who have prepared this report (i.e., all research analysts listed below other than those identified as employed by Citigroup Global Markets Inc.) are not registered/qualified as research analysts with FINRA. Such research analysts may not be associated persons of the member organization and therefore may not be subject to the NYSE Rule 472 and NASD Rule 2711 restrictions on communications with a subject company, public appearances and trading securities held by a research analyst account. The legal entities employing the authors of this report are listed below:

Citigroup Global Markets Inc

Nathan Sheets; Peter D'Antonio; Robert A Sockin

OTHER DISCLOSURES

For securities recommended in the Product in which the Firm is not a market maker, the Firm is a liquidity provider in the issuers' financial instruments and may act as principal in connection with such transactions. The Firm is a regular issuer of traded financial instruments linked to securities that may have been recommended in the Product. The Firm regularly trades in the securities of the issuer(s) discussed in the Product. The Firm may engage in securities transactions in a manner inconsistent with the Product and, with respect to securities covered by the Product, will buy or sell from customers on a principal basis.

Securities recommended, offered, or sold by the Firm: (i) are not insured by the Federal Deposit Insurance Corporation; (ii) are not deposits or other obligations of any insured depository institution (including Citibank); and (iii) are subject to investment risks, including the possible loss of the principal amount invested. Although information has been obtained from and is based upon sources that the Firm believes to be reliable, we do not guarantee its accuracy and it may be incomplete and condensed. Note, however, that the Firm has taken all reasonable steps to determine the accuracy and completeness of the disclosures made in the Important Disclosures section of the Product. The Firm's research department has received assistance from the subject company(ies) referred to in this Product including, but not limited to, discussions with management of the subject company(ies). Firm policy prohibits research analysts from sending draft research to subject companies. However, it should be presumed that the author of the Product has had discussions with the subject company to ensure factual accuracy prior to publication. All opinions, projections and estimates constitute the judgment of the author as of the date of the Product and these, plus any other information contained in the Product, are subject to change without notice. Prices and availability of financial instruments also are subject to change without notice. Notwithstanding other departments within the Firm advising the companies discussed in this Product, information obtained in such role is not used in the preparation of the Product. Although Citi Investment Research & Analysis (CIRA) does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of CIRA to provide research coverage of the/those issuer(s) mentioned therein, including in response to news affecting this issuer, subject to applicable quiet periods and capacity constraints. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. Any decision to purchase securities mentioned in the Product must take into account existing public information on such security or any registered prospectus.

Investing in non-U.S. securities, including ADRs, may entail certain risks. The securities of non-U.S. issuers may not be registered with, nor be subject to the reporting requirements of the U.S. Securities and Exchange Commission. There may be limited information available on foreign securities. Foreign companies are generally not subject to uniform audit and reporting standards, practices and requirements comparable to those in the U.S. Securities of some foreign companies may be less liquid and their prices more volatile than securities of comparable U.S. companies. In addition, exchange rate movements may have an adverse effect on the value of an investment in a foreign stock and its corresponding dividend payment for U.S. investors. Net dividends to ADR investors are estimated, using withholding tax rates conventions, deemed accurate, but investors are urged to consult their tax advisor for exact dividend computations. Investors who have received the Product from the Firm may be prohibited in certain states or other jurisdictions from purchasing securities mentioned in the Product from the Firm. Please ask your Financial Consultant for additional details. Citigroup Global Markets Inc. takes responsibility for the Product in the United States. Any orders by US investors resulting from the information contained in the Product may be placed only through Citigroup Global Markets Inc.

Important Disclosures for Morgan Stanley Smith Barney LLC Customers: Morgan Stanley & Co. LLC (Morgan Stanley) research reports may be available about the companies that are the subject of this Citi Investment Research & Analysis (CIRA) research report. Ask your Financial Advisor or use

smithbarney.com to view any available Morgan Stanley research reports in addition to CIRA research reports.

Important disclosure regarding the relationship between the companies that are the subject of this CIRA research report and Morgan Stanley Smith Barney LLC and its affiliates are available at the Morgan Stanley Smith Barney disclosure website at www.morganstanleysmithbarney.com/researchdisclosures. For Morgan Stanley and Citigroup Global Markets, Inc. specific disclosures, you may refer to www.morganstanley.com/researchdisclosures and https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures.

This CIRA research report has been reviewed and approved on behalf of Morgan Stanley Smith Barney LLC. This review and approval was conducted by the same person who reviewed this research report on behalf of CIRA. This could create a conflict of interest.

The Citigroup legal entity that takes responsibility for the production of the Product is the legal entity which the first named author is employed by.

The Product is made available in **Australia** through Citigroup Global Markets Australia Pty Ltd. (ABN 64 003 114 832 and AFSL No. 240992), participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN 88 004 325 080 and AFSL 238098). Citigroup Pty Limited provides all financial product advice to Australian Private Banking wholesale clients through bankers and relationship managers. If there is any doubt about the suitability of investments held in Citigroup Private Bank accounts, investors should contact the Citigroup Private Bank in Australia. Citigroup companies may compensate affiliates and their representatives for providing products and services to clients. The Product is made available in **Brazil** by Citigroup Global Markets Brasil - CCTVM SA, which is regulated by CVM - Comissão de Valores Mobiliários, BACEN - Brazilian Central Bank, APIMEC - Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANBID - Associação Nacional dos Bancos de Investimento. Av. Paulista, 1111 - 11º andar - CEP. 01311920 - São Paulo - SP. If the Product is being made available in certain provinces of **Canada** by Citigroup Global Markets (Canada) Inc. ("CGM Canada"), CGM Canada has approved the Product. Citigroup Place, 123 Front Street West, Suite 1100, Toronto, Ontario M5J 2M3. This product is available in **Chile** through Banchile Corredores de Bolsa S.A., an indirect subsidiary of Citigroup Inc., which is regulated by the Superintendencia de Valores y Seguros. Agustinas 975, piso 2, Santiago, Chile. The Product is made available in **France** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 1-5 Rue Paul Cézanne, 8ème, Paris, France. The Product is distributed in **Germany** by Citigroup Global Markets Deutschland AG ("CGMD"), which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). CGMD, Reuterweg 16, 60323 Frankfurt am Main. Research which relates to "securities" (as defined in the Securities and Futures Ordinance (Cap. 571 of the Laws of Hong Kong)) is issued in **Hong Kong** by, or on behalf of, Citigroup Global Markets Asia Limited which takes full responsibility for its content. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Research is made available through Citibank, N.A., Hong Kong Branch, for its clients in Citi Private Bank, it is made available by Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citibank N.A. is regulated by the Hong Kong Monetary Authority. Please contact your Private Banker in Citibank N.A., Hong Kong, Branch if you have any queries on or any matters arising from or in connection with this document. The Product is made available in **India** by Citigroup Global Markets India Private Limited, which is regulated by Securities and Exchange Board of India. Bakhtawar, Nariman Point, Mumbai 400-021. The Product is made available in **Indonesia** through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, Jl. Jend. Sudirman Kav. 54-55, Jakarta 12190. Neither this Product nor any copy hereof may be distributed in Indonesia or to any Indonesian citizens wherever they are domiciled or to Indonesian residents except in compliance with applicable capital market laws and regulations. This Product is not an offer of securities in Indonesia. The securities referred to in this Product have not been registered with the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) pursuant to relevant capital market laws and regulations, and may not be offered or sold within the territory of the Republic of Indonesia or to Indonesian citizens through a public offering or in circumstances which constitute an offer within the meaning of the Indonesian capital market laws and regulations. The Product is made available in **Israel** through Citibank NA, regulated by the Bank of Israel and the Israeli Securities Authority. Citibank, N.A. Platinum Building, 21 Ha'arba'ah St, Tel Aviv, Israel. The Product is made available in **Italy** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. Via dei Mercanti, 12, Milan, 20121, Italy. The Product is made available in **Japan** by Citigroup Global Markets Japan Inc. ("CGMJ"), which is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Shin-Marunouchi Building, 1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520 Japan. If the Product was distributed by SMBC Nikko Securities Inc. it is being so distributed under license. In the event that an error is found in an CGMJ research report, a revised version will be posted on the Firm's Citi Velocity website. If you have questions regarding Citi Velocity, please call (81 3) 6270-3019 for help. The Product is made available in **Korea** by Citigroup Global Markets Korea Securities Ltd., which is regulated by the Financial Services Commission, the Financial Supervisory Service and the Korea Financial Investment Association (KOFIA). Citibank Building, 39 Da-dong, Jung-gu, Seoul 110-180, Korea. KOFIA makes available registration information of research analysts on its website. Please visit the following website if you wish to find KOFIA registration information on research analysts of Citigroup Global Markets Korea Securities Ltd. <http://dis.kofia.or.kr/fs/dis2/fundMgr/DISFundMgrAnalystPop.jsp?companyCd=A03030&pageDiv=02>. The Product is made available in **Malaysia** by Citigroup Global Markets Malaysia Sdn Bhd (Company No. 460819-D) ("CGMM") to its clients and CGMM takes responsibility for its contents. CGMM is regulated by the Securities Commission of Malaysia. Please contact CGMM at Level 43 Menara Citibank, 165 Jalan Ampang, 50450 Kuala Lumpur, Malaysia in respect of any matters arising from, or in connection with, the Product. The Product is made available in **Mexico** by Acciones y Valores Banamex, S.A. De C. V., Casa de Bolsa, Integrante del Grupo Financiero Banamex ("Accival") which is a wholly owned subsidiary of Citigroup Inc. and is regulated by Comision Nacional Bancaria y de Valores. Reforma 398, Col. Juarez, 06600 Mexico, D.F. In **New Zealand** the Product is made available to 'wholesale clients' only as defined by s5C(1) of the Financial Advisers Act 2008 ('FAA') through Citigroup Global Markets Australia Pty Ltd (ABN 64 003 114 832 and AFSL No. 240992), an overseas financial adviser as defined by the FAA, participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in **Pakistan** by Citibank N.A. Pakistan branch, which is regulated by the State Bank of Pakistan and Securities Exchange Commission, Pakistan. AWT Plaza, 1.1. Chundrigar Road, P.O. Box 4889, Karachi-74200. The Product is made available in the **Philippines** through Citicorp Financial Services and Insurance Brokerage Philippines, Inc., which is regulated by the Philippines Securities and Exchange Commission. 20th Floor Citibank Square Bldg. The Product is made available in the Philippines through Citibank NA Philippines branch, Citibank Tower, 8741 Paseo De Roxas, Makati City, Manila. Citibank NA Philippines NA is regulated by The Bangko Sentral ng Pilipinas. The Product is made available in **Poland** by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Nadzoru Finansowego. Dom Maklerski Banku Handlowego S.A. ul.Senatorska 16, 00-923 Warszawa. The Product is made available in the **Russian Federation** through ZAO Citibank, which is licensed to carry out banking activities in the Russian Federation in accordance with the general banking license issued by the Central Bank of the Russian Federation and brokerage activities in accordance with the license issued by the Federal Service for Financial Markets. Neither the Product nor any information contained in the Product shall be considered as advertising the securities mentioned in this report within the territory of the Russian Federation or outside the Russian Federation. The Product does not constitute an appraisal within the

meaning of the Federal Law of the Russian Federation of 29 July 1998 No. 135-FZ (as amended) On Appraisal Activities in the Russian Federation. 8-10 Gasheka Street, 125047 Moscow. The Product is made available in **Singapore** through Citigroup Global Markets Singapore Pte. Ltd. ("CGMSPL"), a capital markets services license holder, and regulated by Monetary Authority of Singapore. Please contact CGMSPL at 8 Marina View, 21st Floor Asia Square Tower 1, Singapore 018960, in respect of any matters arising from, or in connection with, the analysis of this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). The Product is made available by The Citigroup Private Bank in Singapore through Citibank, N.A., Singapore Branch, a licensed bank in Singapore that is regulated by Monetary Authority of Singapore. Please contact your Private Banker in Citibank N.A., Singapore Branch if you have any queries on or any matters arising from or in connection with this document. This report is intended for recipients who are accredited, expert and institutional investors as defined under the Securities and Futures Act (Cap. 289). This report is distributed in Singapore by Citibank Singapore Ltd ("CSL") to selected Citigold/Citigold Private Clients. CSL provides no independent research or analysis of the substance or in preparation of this report. Please contact your Citigold/Citigold Private Client Relationship Manager in CSL if you have any queries on or any matters arising from or in connection with this report. This report is intended for recipients who are accredited investors as defined under the Securities and Futures Act (Cap. 289). Citigroup Global Markets (Pty) Ltd. is incorporated in the **Republic of South Africa** (company registration number 2000/025866/07) and its registered office is at 145 West Street, Sandton, 2196, Saxonwold. Citigroup Global Markets (Pty) Ltd. is regulated by JSE Securities Exchange South Africa, South African Reserve Bank and the Financial Services Board. The investments and services contained herein are not available to private customers in South Africa. The Product is made available in **Spain** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 29 Jose Ortega Y Gassef, 4th Floor, Madrid, 28006, Spain. The Product is made available in the **Republic of China** through Citigroup Global Markets Taiwan Securities Company Ltd. ("CGMTS"), 14 and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan and/or through Citibank Securities (Taiwan) Company Limited ("CSTL"), 14 and 15F, No. 1, Songzhi Road, Taipei 110, Taiwan, subject to the respective license scope of each entity and the applicable laws and regulations in the Republic of China. CGMTS and CSTL are both regulated by the Securities and Futures Bureau of the Financial Supervisory Commission of Taiwan, the Republic of China. No portion of the Product may be reproduced or quoted in the Republic of China by the press or any third parties [without the written authorization of CGMTS and CSTL]. If the Product covers securities which are not allowed to be offered or traded in the Republic of China, neither the Product nor any information contained in the Product shall be considered as advertising the securities or making recommendation of the securities in the Republic of China. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security or financial products. Any decision to purchase securities or financial products mentioned in the Product must take into account existing public information on such security or the financial products or any registered prospectus. The Product is made available in **Thailand** through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 18/F, 22/F and 29/F, 82 North Sathorn Road, Silom, Bangrak, Bangkok 10500, Thailand. The Product is made available in **Turkey** through Citibank AS which is regulated by Capital Markets Board. Tekfen Tower, Eski Buyukdere Caddesi # 209 Kat 2B, 23294 Levent, Istanbul, Turkey. In the **U.A.E.**, these materials (the "Materials") are communicated by Citigroup Global Markets Limited, DIFC branch ("CGML"), an entity registered in the Dubai International Financial Center ("DIFC") and licensed and regulated by the Dubai Financial Services Authority ("DFSA") to Professional Clients and Market Counterparties only and should not be relied upon or distributed to Retail Clients. A distribution of the different CIRA ratings distribution, in percentage terms for Investments in each sector covered is made available on request. Financial products and/or services to which the Materials relate will only be made available to Professional Clients and Market Counterparties. The Product is made available in **United Kingdom** by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. This material may relate to investments or services of a person outside of the UK or to other matters which are not regulated by the FSA and further details as to where this may be the case are available upon request in respect of this material. Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. The Product is made available in **United States** by Citigroup Global Markets Inc, which is a member of FINRA and registered with the US Securities and Exchange Commission. 388 Greenwich Street, New York, NY 10013. Unless specified to the contrary, within EU Member States, the Product is made available by Citigroup Global Markets Limited, which is regulated by Financial Services Authority. Pursuant to Comissão de Valores Mobiliários Rule 483, Citi is required to disclose whether a Citi related company or business has a commercial relationship with the subject company. Considering that Citi operates multiple businesses in more than 100 countries around the world, it is likely that Citi has a commercial relationship with the subject company.

Many European regulators require that a firm must establish, implement and make available a policy for managing conflicts of interest arising as a result of publication or distribution of investment research. The policy applicable to CIRA's Products can be found at https://www.citivelocity.com/cvr/eppublic/citi_research_disclosures.

Compensation of equity research analysts is determined by equity research management and Citigroup's senior management and is not linked to specific transactions or recommendations.

The Product may have been distributed simultaneously, in multiple formats, to the Firm's worldwide institutional and retail customers. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would not be permitted.

Subject to the nature and contents of the Product, the investments described therein are subject to fluctuations in price and/or value and investors may get back less than originally invested. Certain high-volatility investments can be subject to sudden and large falls in value that could equal or exceed the amount invested. Certain investments contained in the Product may have tax implications for private customers whereby levels and basis of taxation may be subject to change. If in doubt, investors should seek advice from a tax adviser. The Product does not purport to identify the nature of the specific market or other risks associated with a particular transaction. Advice in the Product is general and should not be construed as personal advice given it has been prepared without taking account of the objectives, financial situation or needs of any particular investor. Accordingly, investors should, before acting on the advice, consider the appropriateness of the advice, having regard to their objectives, financial situation and needs. Prior to acquiring any financial product, it is the client's responsibility to obtain the relevant offer document for the product and consider it before making a decision as to whether to purchase the product. With the exception of our product that is made available only to Qualified Institutional Buyers (QIBs), CIRA concurrently disseminates its research via proprietary and non-proprietary electronic distribution platforms. Periodically, individual CIRA analysts may also opt to circulate research posted on such platforms to one or more clients by email. Such email distribution is discretionary and is done only after the research has been disseminated via the aforementioned distribution channels. CIRA simultaneously distributes product that is limited to QIBs only through email distribution.

The level and types of services provided by CIRA analysts to clients may vary depending on various factors such as the client's individual preferences as to the frequency and manner of receiving communications from analysts, the client's risk profile and investment focus and perspective (e.g. market-wide, sector specific, long term, short-term etc.), the size and scope of the overall client relationship with Citi and legal and regulatory constraints.

CIRA product may source data from dataCentral. dataCentral is a CIRA proprietary database, which includes Citi estimates, data from company reports and feeds from Reuters and Datastream.

© 2012 Citigroup Global Markets Inc. Citi Investment Research & Analysis is a division of Citigroup Global Markets Inc. Citi and Citi with Arc Design are trademarks and service marks of Citigroup Inc. and its affiliates and are used and registered throughout the world. All rights reserved. Any unauthorized use, duplication, redistribution or disclosure of this report (the "Product"), including, but not limited to, redistribution of the Product by electronic mail, posting of the Product on a website or page, and/or providing to a third party a link to the Product, is prohibited by law and will result in prosecution. The information contained in the Product is intended solely for the recipient and may not be further distributed by the recipient to any third party. Where included in this report, MSCI sourced information is the exclusive property of Morgan Stanley Capital International Inc. (MSCI). Without prior written permission of MSCI, this information and any other MSCI intellectual property may not be reproduced, disseminated or used to create any financial products, including any indices. This information is provided on an "as is" basis. The user assumes the entire risk of any use made of this information. MSCI, its affiliates and any third party involved in, or related to, computing or compiling the information hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability or fitness for a particular purpose with respect to any of this information. Without limiting any of the foregoing, in no event shall MSCI, any of its affiliates or any third party involved in, or related to, computing or compiling the information have any liability for any damages of any kind. MSCI, Morgan Stanley Capital International and the MSCI indexes are services marks of MSCI and its affiliates. The Firm accepts no liability whatsoever for the actions of third parties. The Product may provide the addresses of, or contain hyperlinks to, websites. Except to the extent to which the Product refers to website material of the Firm, the Firm has not reviewed the linked site. Equally, except to the extent to which the Product refers to website material of the Firm, the Firm takes no responsibility for, and makes no representations or warranties whatsoever as to, the data and information contained therein. Such address or hyperlink (including addresses or hyperlinks to website material of the Firm) is provided solely for your convenience and information and the content of the linked site does not in anyway form part of this document. Accessing such website or following such link through the Product or the website of the Firm shall be at your own risk and the Firm shall have no liability arising out of, or in connection with, any such referenced website.

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST
