

Econometric analysis undertaken in support of the consultation document on the OFT's provisional decision to make a market investigation reference to the Competition Commission of the supply of statutory audit services to large companies in the UK

Introduction

This document summarises some of the econometric results from Oxera's study into the market for audit services, *Competition and choice in the UK audit market*, April 2006.¹ It describes work the OFT has conducted to test the robustness of Oxera's results by applying similar modelling techniques to an updated dataset and by addressing some comments about the validity of the original results.

Summary of Oxera methodology and results

Oxera used company financial data from FAME to investigate sources of variation in audit fees amongst UK listed companies, focusing in particular on the effects that auditor market share and concentration in the provision of audit services have on audit fees. Its dataset covered the period 1995-2004 and included UK listed companies that traded on the Main Market of the London Stock Exchange in 2004 for which data on variables of interest was available. Companies did not have to have data for all ten years. Market shares were defined as the percentage of total audit fees in a particular year and industry accruing to that auditor. HHI was defined as the sum of the squared market shares for a particular year and industry. In its study, Oxera used thirteen broad industry categorisations based on UK SIC codes.

Controlling for a variety of other factors that could affect fees (such as company turnover), Oxera found a positive relationship between both auditor market share and concentration and audit fees. It also found a negative relationship between the total number of times a company had switched auditors to that date and the audit fees they were subsequently charged. It tried a large number of different ways of modelling this relationship and found very similar results in each case.

¹ Commissioned by the DTI and the FRC.

Oxera's preferred model (Table 5.4, Model III) found that:

- A 100 percent increase in auditor market share was associated with a 5 percent increase in audit fees.
- A 100 percent increase in HHI² for provision of audit services was associated with a 16 percent increase in audit fees.
- Switching auditor was associated with an approximately 5.7 percent reduction in audit fees.³

Oxera found all of the above estimated effects to be statistically significant.

In isolating these effects, Oxera controlled for a number of additional factors that might be expected to drive audit fees. These included:

- Company turnover
- International turnover⁴
- Lagged audit fees
- Mergers⁵
- Industry controls

² Herfindahl-Hirschmann Index (HHI) is a measure of concentration based on the sum of the square of percentage market shares within a market. HHI levels greater than 1800 are typically considered to represent highly concentrated markets.

³ The exact magnitude of the estimated effect is $e^{-0.057}-1 = -0.055$, or a decrease of 5.5 percent.

⁴ Oxera defines international turnover as the ratio of a company's international turnover to total turnover, as of 2004. Thus, in Oxera's report, this variable is a constant for a given company. We were able to calculate that ratio for each year for a given company, if data were available. This allowed us to include that explanatory variable in the fixed effects models as well, whilst if it were a constant for a given company, we would not have been able to include it in the fixed effects models. Nevertheless, if we define international turnover as a constant for a given company, equal to the ratio of a company's international turnover to total turnover for 2010, we obtain very similar results. As mentioned above, in that case since the variable is a constant for a given company, we can only include it in the random effects model but not in the fixed effects model.

⁵ Defined as an increase in turnover of more than 40 per cent compared to the previous year.

- Year controls
- Market type (for example, FTSE Small Cap)

Oxera's preferred model assumed random firm-specific effects. This is appropriate if all unobserved firm-specific factors that drive audit fees (e.g. complexity of business model) are unrelated to the explanatory variables included in the model. The OFT considers this assumption in a separate section below. Oxera also estimated a fixed effects model, which relaxes the random effects assumption, and found there was no significant difference in estimated effects for the variables of interest. As a result, it preferred the random effects model because it allowed for testing the effect of factors that are constant over time on audit fees. Fixed effects models do not allow for any such factors to be assessed because of the way the data is transformed for estimation.

Updated analysis

We were interested in updating Oxera's results and checking their robustness, particularly with respect to comments made by some stakeholders following publication by Oxera. We obtained an updated dataset from FAME covering the period 2001 to 2010, covering the FTSE 350.^{6, 7} This updated dataset was used to replicate the main models reported by Oxera in Section 5 and Appendix 2 of its report. This analysis found some similar qualitative results, which implies that Oxera's results may be relatively robust and also that the impact of concentration in the audit market on audit fees has not changed much in the last six years.

Fixed-effects and random-effects models: We did not consider the assumptions necessary for the random-effects model to be likely to hold in this case. Specifically, we consider that there may be reasons why unobserved company-specific characteristics that drive audit fees might also be linked with the variables included in our models. For example, a

⁶ This includes data in the FAME database as of June 2011.

⁷ In addition to FTSE 350, the econometric analysis in Table 5.4 of the Oxera report also included FTSE Small Cap companies, FTSE Fledgling companies, and the 100 largest (by turnover) private companies. The OFT econometric analysis used data on FTSE 350 companies only, and, in the random effects model, distinguished between FTSE 100 and FTSE 250 companies.

more complex company might require an auditor with specialised knowledge of the industry. This specialised knowledge might reasonably be expected to be linked to the market share. If this were the case, it would bias the results of our econometric analysis in an indeterminate direction.

In this case, since we were more concerned about estimating the impact of audit fee drives that do vary over time than those that do not, in particular market share and concentration, we preferred the fixed-effects approach over the random effects approach. We note that, similarly to the results from Oxera, the difference between the two approaches was small. Furthermore, the results of a Hausman specification test indicate that a fixed effects estimator is preferable to a random effects estimator.

Key results: Our analysis found that:

- A 100 percent increase in auditor market share was associated with a 10 percent increase in audit fees;
- A 100 percent increase in HHI for the provision of audit services was associated with a 37 percent increase in audit fees;
- Switching auditor was not found to be a significant explanatory variable for audit fees.

Discussion of the Oxera model

One critique of Oxera's work concerned the potential for inaccuracies in the FAME dataset it used. This highlighted a number of errors in the recorded amounts of fees by looking at outliers in the dataset and comparing the data against the company's historic accounts. As a result, it was suggested that using Companies House data instead of FAME data would provide a more accurate basis for analysis, and that the results based on the FAME dataset would be likely to be driven by those errors rather than genuine relationships.

We could see reasons why data errors might bias results towards finding a stronger relationship between market share and audit fee than actually exists. In particular, if audit fees are recorded as erroneously high, the market share for that auditor will appear higher than it actually was in

that year. This could drive a positive association between market share and audit fees which is not actually there.

Potential outliers in the regression sample

We did not consider that Companies House data would be likely to be helpful in removing any errors, as FAME data is taken directly from Companies House. Rather, OFT inspected the updated FAME dataset for outliers and considered the contribution these outliers made to results.

The OFT has considered, separately, the following three ways of identifying potential outliers in the analysis.

1. The OFT identified statistical outliers.⁸ A new regression model was then estimated with all such observations removed.
2. Observations were removed where audit fees increased by more than £2m and by more than 50 per cent compared to the previous year. A new regression model was then estimated having removed all such observations.
3. Observations were removed where audit fees increased by more than 50 per cent compared to the previous year. A new regression model was then estimated having removed all such observations.

It is worth noting that in the treatment of outliers in the second and third methods, all observations for a company were removed where it had a single outlier. This was because a dramatic increase in audit fees in a particular period could mean that audit fees have been entered at too high a level in that period or at too low a level in the period before, and it is difficult to distinguish between the two when considering a large number of cases as each must be inspected visually and compared against actual accounts.

The results from this process were that:

- Removing outliers through the first method does not change the above results materially.⁹

⁸ An observation for which the level of the audit fee is at least two inter-quartile ranges below the lower quartile or above the upper quartile of audit fees.

- Removing outliers by the second and third methods rendered both auditor market share and HHI measures as insignificant. However, we note that these models were estimated using far fewer observations than for other models (approximately half the full sample). There could be many legitimate reasons for audit fees to increase by more than 50 per cent year-on-year, so these methods of removing outliers could be too restrictive. The FAME dataset is generally regarded as being a reputable source of company financial information and we consider it unlikely that the outliers identified using the second and third methods are indeed all errors. We note that many of the outliers identified in the second and third methods see a significant increase in audit fees because of a similar increase in turnover. Because we have controlled for turnover and for large increases in turnover, we do not consider the inclusion of these observations likely to bias results.

Conclusion

Overall, we consider that the Oxera model and our model of audit fees provide some support for the hypothesis that auditors with higher market shares can charge higher audit fees and that an increase in concentration in the provision of audit services is associated with an increase in the level of audit fees. These findings are robust across the time periods and models considered by ourselves and Oxera. However we cannot rule out that auditors with high market shares charge higher fees because they offer a higher quality product. The OFT also notes it is possible that results are driven by a large number of data errors in the FAME database, although we consider this to be unlikely.

⁹ The impact of auditor market share on audit fees falls to 9 per cent and the impact of HHI concentration falls to 35 per cent. Switching remains insignificant.

Details of the analysis undertaken

Fixed-effects model

```
Fixed-effects (within) regression
Group variable: co_id
R-sq:  within = 0.2896
        between = 0.7913
        overall = 0.7269
Number of obs   = 2055
Number of groups = 298
Obs per group: min = 1
                avg  = 6.9
                max  = 9
```

```
corr(u_i, Xb) = 0.5946
F(15,1742)    = 47.34
Prob > F      = 0.0000
```

ln_audit	Coef.	Std. Err.	t	P> t	[95% Conf. Interval]	
lag_audit	.1040885	.0219386	4.74	0.000	.0610597	.1471173
Iyear~2003	.0248023	.0377896	0.66	0.512	-.0493155	.0989202
Iyear~2004	.1423142	.0373444	3.81	0.000	.0690696	.2155588
Iyear~2005	.2021477	.0372631	5.42	0.000	.1290627	.2752328
Iyear~2006	.2112276	.037692	5.60	0.000	.1373012	.285154
Iyear~2007	.2471035	.0383372	6.45	0.000	.1719116	.3222953
Iyear~2008	.2718466	.0389482	6.98	0.000	.1954564	.3482368
Iyear~2009	.251908	.0396009	6.36	0.000	.1742377	.3295783
Iyear~2010	.2344309	.0407238	5.76	0.000	.1545583	.3143034
ln_turnover	.2761607	.0277002	9.97	0.000	.2218316	.3304897
ln_aud_share	.1038383	.0183188	5.67	0.000	.067909	.1397675
ln_HHI	.3734617	.101449	3.68	0.000	.1744871	.5724364
switches	-.0425765	.0449831	-0.95	0.344	-.1308032	.0456501
int_turnover	.1242782	.0384699	3.23	0.001	.0488262	.1997302
mergers	.0249619	.0261439	0.95	0.340	-.0263148	.0762386
_cons	2.368155	.391312	6.05	0.000	1.600664	3.135646
sigma_u	.89376081					
sigma_e	.35131136					
rho	.86617229	(fraction of variance due to u_i)				

```
F test that all u_i=0: F(297, 1742) = 4.89 Prob > F = 0.0000
```

Random-effects model

```
Random-effects GLS regression
Group variable: co_id
R-sq:  within = 0.1728
        between = 0.9762
        overall = 0.8969
Number of obs   = 2055
Number of groups = 298
Obs per group: min = 1
                avg  = 6.9
                max  = 9
```

```
Random effects u_i ~ Gaussian
corr(u_i, X) = 0 (assumed)
Wald chi2(27) = 17387.79
Prob > chi2   = 0.0000
```

ln_audit	Coef.	Std. Err.	z	P> z	[95% Conf. Interval]	
lag_audit	.7289814	.0139745	52.17	0.000	.701592	.7563709
Iyear~2002	.0665207	.0449759	1.48	0.139	-.0216305	.1546719
Iyear~2003	.0477474	.0436365	1.09	0.274	-.0377786	.1332735
Iyear~2004	.1272921	.0418435	3.04	0.002	.0452803	.2093038
Iyear~2005	.1448927	.040874	3.54	0.000	.064781	.2250043
Iyear~2006	.0932128	.0398485	2.34	0.019	.0151111	.1713145
Iyear~2007	.0864442	.0391303	2.21	0.027	.0097501	.1631382
Iyear~2008	.1082696	.0388828	2.78	0.005	.0320608	.1844785
Iyear~2009	.0131716	.0381698	0.35	0.730	-.0616398	.087983
ln_turnover	.1554053	.0112606	13.80	0.000	.1333348	.1774757
ln_aud_share	.0332026	.0098487	3.37	0.001	.0138995	.0525056
ln_HHI	.2724733	.120792	2.26	0.024	.0357253	.5092212
switches	.0322088	.0262383	1.23	0.220	-.0192173	.0836349
int_turnover	.1666285	.0313442	5.32	0.000	.1051949	.228062
_Iindustry_2	-.1788617	.1729395	-1.03	0.301	-.5178169	.1600935

_Iindustry_3	-.1893673	.0583846	-3.24	0.001	-.303799	-.0749357
_Iindustry_4	-.02341	.0585246	-0.40	0.689	-.1381161	.0912961
_Iindustry_5	.0592898	.0374121	1.58	0.113	-.0140366	.1326161
_Iindustry_6	-.0474075	.0563422	-0.84	0.400	-.1578362	.0630213
_Iindustry_7	-.2667788	.0630094	-4.23	0.000	-.3902749	-.1432827
_Iindustry_8	-.2895716	.2100907	-1.38	0.168	-.7013417	.1221985
_Iindustry_9	-.2502376	.0674883	-3.71	0.000	-.3825122	-.1179629
_Iindustr~10	-.2498571	.0987784	-2.53	0.011	-.4434592	-.056255
_Iindustr~11	-.0054573	.0472258	-0.12	0.908	-.0980182	.0871036
_Iindustr~12	.1173932	.0547223	2.15	0.032	.0101395	.2246469
_Iftse_typ~2	-.0644697	.0279136	-2.31	0.021	-.1191793	-.00976
mergers	-.0068057	.0135029	-0.50	0.614	-.033271	.0196595
_cons	-.0219682	.194525	-0.11	0.910	-.4032301	.3592938

sigma_u	.01667401					
sigma_e	.35131136					
rho	.0022476	(fraction of variance due to u_i)				

Comparison of random and fixed effects models

Random and fixed effects

Variable	random	fixed
lag_audit	0.7290***	0.1041***
ln_turnover	0.1554***	0.2762***
ln_aud_share	0.0332***	0.1038***
ln_HHI	0.2725**	0.3735***
switches	0.0322	-0.0426
int_turnover	0.1666***	0.1243***
mergers	-0.0068	0.0250

N	2055	2055

legend: * p<.1; ** p<.05; *** p<.01

Hausman test results – supportive of a fixed-effects specification

Hausman test using covariance matrices based on the estimated disturbance variance from efficient estimator

	---- Coefficients ----		(b-B)	sqrt(diag(V_b-V_B))
	(b)	(B)	Difference	S.E.
	fixed	random		
lag_audit	.1040885	.7289814	-.6248929	.023688
Iyear~2003	.0248023	.0477474	-.0229451	.0184436
Iyear~2004	.1423142	.1272921	.0150221	.0209968
Iyear~2005	.2021477	.1448927	.0572551	.0226167
Iyear~2006	.2112276	.0932128	.1180148	.0253935
Iyear~2007	.2471035	.0864442	.1606593	.0279042
Iyear~2008	.2718466	.1082696	.1635769	.0295325
Iyear~2009	.251908	.0131716	.2387364	.0317439
ln_turnover	.2761607	.1554053	.1207554	.0328493
ln_aud_share	.1038383	.0332026	.0706357	.020746
ln_HHI	.3734617	.2724733	.1009885	.0397981
switches	-.0425765	.0322088	-.0747853	.0499162
int_turnover	.1242782	.1666285	-.0423503	.0366521
mergers	.0249619	-.0068057	.0317676	.0298639

b = consistent under Ho and Ha; obtained from xtreg
 B = inconsistent under Ha, efficient under Ho; obtained from xtreg

Test: Ho: difference in coefficients not systematic

$$\text{chi2}(14) = (b-B)'[(V_b-V_B)^{-1}](b-B) = 908.16$$

Prob>chi2 = 0.0000

Hausman test using covariance matrix based on the estimated disturbance variance from consistent estimator

	---- Coefficients ----		(b-B) Difference	sqrt(diag(V_b-V_B)) S.E.
	(b) fixed	(B) random		
lag_audit	.1040885	.7289814	-.6248929	.0188956
Iyear~2003	.0248023	.0477474	-.0229451	.0147122
Iyear~2004	.1423142	.1272921	.0150221	.0167488
Iyear~2005	.2021477	.1448927	.0572551	.018041
Iyear~2006	.2112276	.0932128	.1180148	.020256
Iyear~2007	.2471035	.0864442	.1606593	.0222587
Iyear~2008	.2718466	.1082696	.1635769	.0235576
Iyear~2009	.251908	.0131716	.2387364	.0253216
ln_turnover	.2761607	.1554053	.1207554	.0262034
ln_aud_share	.1038383	.0332026	.0706357	.0165487
ln_HHI	.3734617	.2724733	.1009885	.0317463
switches	-.0425765	.0322088	-.0747853	.0398174
int_turnover	.1242782	.1666285	-.0423503	.0292368
mergers	.0249619	-.0068057	.0317676	.023822

b = consistent under Ho and Ha; obtained from xtreg
 B = inconsistent under Ha, efficient under Ho; obtained from xtreg

Test: Ho: difference in coefficients not systematic

chi2(14) = (b-B)'[(V_b-V_B)^(-1)](b-B)
 = 1427.26
 Prob>chi2 = 0.0000

Fixed-effects model – outliers removed (first method)

Fixed-effects (within) regression
 Group variable: co_id
 R-sq: within = 0.2759
 between = 0.7601
 overall = 0.6513

Number of obs = 1837
 Number of groups = 282
 Obs per group: min = 1
 avg = 6.5
 max = 9

corr(u_i, Xb) = 0.4714
 F(15,1540) = 39.13
 Prob > F = 0.0000

ln_audit	Coef.	Std. Err.	t	P> t	[95% Conf. Interval]	
lag_audit	.1315732	.0263248	5.00	0.000	.079937	.1832095
Iyear~2003	.0270089	.0400962	0.67	0.501	-.05164	.1056578
Iyear~2004	.1284489	.0401405	3.20	0.001	.0497131	.2071847
Iyear~2005	.204889	.0402149	5.09	0.000	.1260072	.2837708
Iyear~2006	.2049711	.0407988	5.02	0.000	.1249441	.2849981
Iyear~2007	.2380065	.0415208	5.73	0.000	.1565633	.3194497
Iyear~2008	.2595238	.0422939	6.14	0.000	.1765641	.3424834
Iyear~2009	.2376561	.0430391	5.52	0.000	.1532346	.3220776
Iyear~2010	.2086529	.0442544	4.71	0.000	.1218476	.2954582
ln_turnover	.2611545	.0294985	8.85	0.000	.203293	.319016
ln_aud_share	.0888326	.0191098	4.65	0.000	.0513487	.1263165
ln_HHI	.3469061	.1092784	3.17	0.002	.1325558	.5612564
switches	-.0220049	.0471019	-0.47	0.640	-.1143955	.0703857
int_turnover	.143338	.0431596	3.32	0.001	.0586801	.2279959
mergers	.0178505	.0282799	0.63	0.528	-.0376207	.0733217
_cons	2.195215	.4039034	5.43	0.000	1.402956	2.987474

sigma_u	.78803375
sigma_e	.35972857
rho	.82755287 (fraction of variance due to u_i)

F test that all u_i=0: F(281, 1540) = 3.68 Prob > F = 0.0000

Fixed-effects model – outliers removed (second method)

Fixed-effects (within) regression
 Group variable: co_id

Number of obs = 1064
 Number of groups = 166

R-sq: within = 0.2475
 between = 0.9662
 overall = 0.9075

Obs per group: min = 1
 avg = 6.4
 max = 9

corr(u_i, Xb) = 0.7962

F(15,883) = 19.36
 Prob > F = 0.0000

ln_audit	Coef.	Std. Err.	t	P> t	[95% Conf. Interval]
lag_audit	.4800033	.051459	9.33	0.000	.379007 .5809995
Iyear~2002	-.0515396	.0447722	-1.15	0.250	-.139412 .0363327
Iyear~2004	.0345329	.0434993	0.79	0.427	-.0508411 .119907
Iyear~2005	.0849546	.0431331	1.97	0.049	.0002993 .1696099
Iyear~2006	.0768747	.0440649	1.74	0.081	-.0096096 .1633589
Iyear~2007	.0666804	.045029	1.48	0.139	-.0216959 .1550568
Iyear~2008	.0976187	.0449871	2.17	0.030	.0093246 .1859127
Iyear~2009	.0742261	.0455577	1.63	0.104	-.015188 .1636402
Iyear~2010	-.0379877	.0475355	-0.80	0.424	-.1312835 .0553081
ln_turnover	.1738785	.0329115	5.28	0.000	.1092845 .2384725
ln_aud_share	.0340576	.0262979	1.30	0.196	-.0175561 .0856714
ln_HHI	-.122155	.1316454	-0.93	0.354	-.3805293 .1362194
switches	-.0757188	.0655562	-1.16	0.248	-.204383 .0529454
int_turnover	.0535176	.0449232	1.19	0.234	-.0346512 .1416863
mergers	-.0759819	.0452271	-1.68	0.093	-.164747 .0127832
_cons	.8853421	.4946657	1.79	0.074	-.0855157 1.8562
sigma_u	.51264892				
sigma_e	.30369616				
rho	.74022283	(fraction of variance due to u_i)			

F test that all u_i=0: F(165, 883) = 1.27 Prob > F = 0.0197

Fixed-effects model – outliers removed (third method)

Fixed-effects (within) regression
 Group variable: co_id

Number of obs = 1108
 Number of groups = 171

R-sq: within = 0.2520
 between = 0.9666
 overall = 0.9167

Obs per group: min = 1
 avg = 6.5
 max = 9

corr(u_i, Xb) = 0.8040

F(15,922) = 20.71
 Prob > F = 0.0000

ln_audit	Coef.	Std. Err.	t	P> t	[95% Conf. Interval]
lag_audit	.4729028	.0491448	9.62	0.000	.376454 .5693515
Iyear~2002	-.0501235	.0433071	-1.16	0.247	-.1351154 .0348684
Iyear~2004	.03226139	.0419692	0.78	0.437	-.0497524 .1149801
Iyear~2005	.0872166	.0416481	2.09	0.037	.0054805 .1689527
Iyear~2006	.0648861	.0425743	1.52	0.128	-.0186677 .14844
Iyear~2007	.0605309	.0432631	1.40	0.162	-.0243747 .1454364
Iyear~2008	.0950994	.0433251	2.20	0.028	.0100721 .1801266
Iyear~2009	.068968	.0439107	1.57	0.117	-.0172086 .1551445
Iyear~2010	-.0333003	.045899	-0.73	0.468	-.1233789 .0567784
ln_turnover	.1825827	.032086	5.69	0.000	.1196126 .2455528
ln_aud_share	.0414447	.0258257	1.60	0.109	-.0092392 .0921286
ln_HHI	-.1348318	.1283186	-1.05	0.294	-.3866622 .1169986
switches	-.0746109	.0646038	-1.15	0.248	-.2013985 .0521766
int_turnover	.0523525	.0425917	1.23	0.219	-.0312354 .1359404
mergers	-.063878	.043061	-1.48	0.138	-.1483869 .0206309
_cons	.8393214	.4832675	1.74	0.083	-.1091104 1.787753
sigma_u	.52558831				
sigma_e	.30035086				
rho	.75382801	(fraction of variance due to u_i)			

F test that all $u_i=0$: $F(170, 922) =$ 1.31 $\text{Prob} > F = 0.0082$