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Operationalizing your bank

Marketing strategy

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Center *for*
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US

About the series

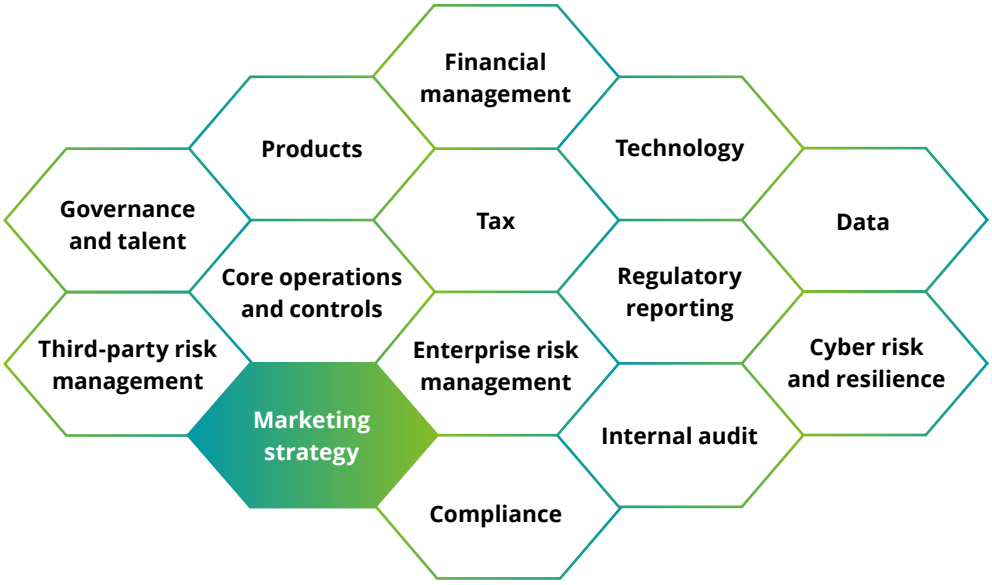
This perspective is part of Deloitte's *Operationalizing Your Bank* series. This series is designed for applicants that have received conditional approval, are progressing toward final approval, or are focused on preparing for bank launch.

In this edition, we focus on marketing strategy and how a new bank should prepare to engage and grow its customers, including market scope, delivery channels, and customer onboarding and retention.

Regulators expect new banks to demonstrate feasibility of their strategy, including having appropriately sized customer audience assumptions, having the capabilities to meet expectations from onboarding to delivery, and offering products and services with long-term economic viability. Banking services' success relies on building trust and lasting relationships.

Other editions of this series will focus on the foundational areas listed in Figure 1.

Figure 1: Series topics



The term "bank" is used broadly throughout this series to cover considerations across common bank charter structures, including national banks, state member/non-member banks, national trust banks, and industrial loan companies (ILCs). Foreign banking organizations, US branches, and bank holding companies have several other nuanced and unique considerations. While this series addresses broadly applicable operationalization considerations, organizations should evaluate this guidance within the context of their business strategy, targeted charter type, and general circumstances as institution-specific requirements may warrant additional considerations beyond what is outlined in this series.

Operationalizing marketing strategy

Marketing strategy translates a bank's growth ambitions into a practical approach to acquiring, serving, and retaining customers. For a de novo bank, readiness means demonstrating the market opportunity, customer value proposition, acquisition assumptions, and planned spending support profitable growth consistent with the business plan. The strategy should reflect the bank's products, funding needs, operating capabilities, and launch timetable.

Developing that strategy requires coordination among qualified personnel representing multiple facets of the organization: marketing, product, customer experience, finance, compliance, legal and operations personnel, among others. Together, these stakeholders should be able to explain the research supporting key assumptions, how projected customer activity informs financial forecasts, and how the bank will deliver on its promises. As launch approaches, the focus should be on validating those assumptions and establishing the people, processes, controls, and reporting needed to execute the strategy from Day 1.

Core insights

1. **Serviceable markets define the launch opportunity:** A bank's addressable market includes the potential customers for its products, while its serviceable market reflects those it can realistically reach and support through its planned operating model. Product scope, distribution, customer eligibility, geography, and operational capacity shape that distinction. A parent's existing customers may provide a starting point for a de novo bank, but access alone does not establish demand for the bank's products or equate to achievable acquisition volumes. For a de novo bank, credible growth projections connect the broader opportunity to specific target segments, realistic acquisition assumptions, and the capabilities available at launch.
2. **Customer economics shape sustainable growth:** Customer segments can differ considerably in their contribution to a bank's long-term profitability. Expected balances, fee income, product adoption, and retention influence the economics of each relationship. Customer lifetime value brings these factors together to estimate the relationship's contribution over time. For a de novo bank, these estimates carry uncertainty because operating history is limited and a parent's experience may not translate directly. Understanding the underlying drivers helps explain how customer acquisition supports sustainable earnings, funding needs, and the bank's financial projections.
3. **Channel strategy connects customer acquisition with service delivery:** Customer engagement depends on how well channels support both acquisition and ongoing service. Existing preferences can inform channel strategy, particularly where a bank draws on a parent's customer base, but a de novo bank should be prepared to introduce new onboarding, identity verification, and disclosure steps. Consistent experiences across advertising, websites, applications, and servicing help customers understand and use the offering. That consistency also needs to preserve clear distinctions between the bank, affiliates, and insured versus uninsured products. Gaps between the advertised experience and operational delivery can weaken conversion and lead to customer complaints.
4. **Past marketing and conversion success are not future guarantees:** Campaign results from peers, parents, or affiliates can inform acquisition forecasts, but their relevance depends on the underlying products, customer audience, and distribution channels. Banking introduces factors such as account-opening requirements, customer trust, funding steps, and pricing that can materially affect conversion. An application, an opened account, a funded account, and an active relationship represent different stages with different economic implications. For a de novo bank, supportable projections distinguish these stages and explain how assumptions translate into customer growth and profitability.
5. **Marketing requires bank-level governance:** Marketing creates expectations for how the bank's products, systems, and servicing capabilities will fulfill customer needs. Inaccurate claims, unclear eligibility rules, or unfulfilled rewards can create consumer protection risks; credit marketing also introduces fair lending considerations. As such, regulators expect governance to extend across advertising, disclosures, offers, incentives, communications, and complaint handling. While affiliate and third-party arrangements can support execution, bank-level oversight and accountability remain essential.

Actions for launch readiness

1. **Revalidate market assumptions against the launch plan:** Before launch, refresh the market assessment using current customer research and the bank's planned product and geographic scope. Combine top-down market estimates with bottom-up assumptions about potential customers, distribution, acquisition capacity, and operating constraints. For each priority segment, test whether the value proposition remains compelling against available alternatives. Document the evidence and reconcile the resulting opportunity estimates with the business plan and financial projections. Where the assessment identifies gaps, management should adjust launch priorities or execution plans and evaluate whether proposed changes require regulatory engagement.
2. **Set acquisition budgets around expected customer value:** Build segment-level estimates of relationship profitability such as expected balances and servicing costs. Acquisition budgets should reflect those estimates and a defined period for recovering acquisition costs. Sensitivity analysis can show how weaker retention or slower product adoption would change the economics. Prioritize segments where research supports the bank's ability to attract and retain customers profitably. While financial needs and behaviors can inform segmentation, the compliance function should review the criteria for potential fair lending concerns.
3. **Test customer journeys across launch channels:** With priority segments established, map the channels and touchpoints used for acquisition, onboarding, engagement, and servicing. Assign owners to handoffs across different functions and third parties. Representative pre-launch walkthroughs should trace the customer experience from an advertisement through application, account opening, funding, and any promised incentive. Use the results to confirm that disclosures, support arrangements, and operational capabilities match the advertised offerings. Resolve material gaps before campaigns begin and establish measures for identifying customer friction and channel performance issues after launch.
4. **Validate growth assumptions and establish performance monitoring:** Marketing, product, and operations teams should agree on acquisition and retention assumptions supported by research and available pre-launch testing. Define each conversion stage and connect projected customer activity to balances, revenue, spending, and servicing capacity. Downside scenarios should assess the consequences of slower acquisition or higher attrition for earnings and funding. Before Day 1, establish reporting owners, review routines, and develop thresholds for reassessing assumptions or changing campaign spending. Management reporting should compare actual performance with the business plan and explain material variances and proposed responses.
5. **Establish and test bank-specific marketing governance:** The bank should define approval authority and workflows for campaigns, disclosures and communications, including work performed by affiliates or vendors. Compliance review, version control, evidence retention, and escalation should be operational before launch. Test offer eligibility, fulfillment, customer communications, and complaint escalation through representative scenarios, with clear owners for resolving failures. Marketing technology should support these controls and allow bank-specific records to be retrieved. Where manual processes are appropriate initially, document the controls and establish a roadmap for automation as volumes and complexity grow. In addition, embed compliance considerations for marketing materials in end-to-end processes.

Where to go from here

A compelling marketing strategy can help secure approval for a new bank, but sustained success ultimately depends on the bank's ability to translate growth ambitions into lasting customer relationships. A defensible customer strategy connects acquisition, onboarding, and retention to a realistic plan for delivering the bank's products and services.

As launch approaches, marketing leaders should put that plan to the test. Customer research and feasibility testing should validate demand, challenge conversion assumptions, and confirm that products, channels, experiences, and operating capabilities can support projected growth. Targets should evolve as evidence improves.



Regulatory insights to action

The Deloitte Center for Regulatory Strategy, US

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