

SUPPORTING STATEMENT

Consolidated Reports of Condition and Income (Insured State Nonmember Banks)

FFIEC 031 and 041
(OMB No. 3064-0052)

INTRODUCTION

The FDIC is submitting for OMB review changes to the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Reports) filed quarterly by insured state nonmember banks. The Federal Reserve Board (FRB) and the Office of the Comptroller of the Currency (OCC) are also submitting these changes for OMB review for the banks under their supervision.

The revisions to the Call Reports that are the subject of this request have been approved by the FFIEC for implementation as of March 31, 2007, and, for certain deposit insurance assessment revisions, March 31, 2008. The agencies are proposing to:

- Replace certain information currently collected in the Call Report and TFR for deposit insurance assessment purposes with the information described in Part 327 of the FDIC's regulations as recently amended (71 FR 69270, November 30, 2006);
- Revise the information collected on time deposits, particularly with respect to certain retirement accounts affected by the FDIC's amended deposit insurance regulations;
- Add a new schedule to collect certain data on fair value measurements from those institutions that choose, under generally accepted accounting principles, to apply a fair value option to one or more financial instruments and one or more classes of servicing assets and liabilities and from certain institutions that report trading assets and liabilities;
- Collect an item for regulatory capital calculation purposes to capture the change in the fair value of liabilities accounted for under a fair value option that is attributable to a change in a bank's own creditworthiness;
- Collect certain data on 1-4 family residential mortgages with terms that allow for negative amortization; and
- Clarify the Call Report instructions for assets serviced for others by explicitly stating that such servicing includes the servicing of loan participations.

As is customary for Call Report changes, banks are being advised that, for the March 31, 2007, report date, they may provide reasonable estimates for any new or revised item for which the requested information is not readily available.

JUSTIFICATION

1. Circumstances and Need

Section 7 of the Federal Deposit Insurance Act requires all insured banks to file four Reports of Condition and Income each year with their primary federal bank supervisory authority, either the FDIC, the OCC, or the FRB (collectively, the agencies). Insured state nonmember banks submit these reports to the FDIC. The FDIC uses the quarterly Call Reports to monitor the condition and performance of individual banks and the industry as a whole. In addition, Call Reports provide the FDIC with the most current statistical data available for evaluating bank corporate applications such as mergers, for identifying areas of focus for both on-site and off-site examinations, for calculating all banks' deposit insurance and Financing Corporation assessments, and for other public purposes.

Within the Call Report information collection system, separate sets of forms apply to banks that have domestic and foreign offices (FFIEC 031) and to banks with domestic offices only (FFIEC 041).

The amount of data required to be reported varies between the two versions of the report forms, with the report forms for banks with domestic and foreign offices (FFIEC 031) having more data elements than the report forms for banks with domestic offices only (FFIEC 041). Furthermore, the amount of data required to be reported varies within the FFIEC 041 report form, primarily based on the size of the bank. In general, the FFIEC 041 report form requires the least amount of data from banks with less than \$100 million in total assets.

The reasons for the changes that are the subject of this submission are described in detail in the agencies initial and final Paperwork Reduction Act Federal Register notices.

2. Use of Information Collected

The information collected in the Call Reports is used by the three federal bank regulatory agencies, including the FDIC, both on an individual bank basis and in aggregate form for supervisory, surveillance, regulatory, research, statistical, insurance assessment, and informational purposes. Each of the three banking agencies makes available to the other two the Call Report data submitted by the banks under its primary supervision in order for each agency to have access to information for the banking system as a whole.

The FDIC uses the data collected in the Call Reports extensively for supervisory/surveillance purposes in an effort to detect at an early date those banks that are experiencing deterioration or some other significant change in their condition. The underlying basis for this activity at the FDIC, as well as at the OCC and the FRB, is the goal of reducing the possibility of the failure of individual institutions and the concomitant exposure of the FDIC's insurance funds. The FDIC has two major surveillance programs (EWS and UBPR) for its use in performing off-site

evaluation of the condition of commercial and savings banks. In addition, various quarterly management and supervisory reports used for off-site monitoring capabilities are available in web-based systems like ViSION (Virtual Supervisory Information on the Net) and distributed systems like ARIS (Automated Regional Information System).

Early Warning Systems (EWS) – The EWS is the FDIC’s umbrella of off-site surveillance models that are used to monitor the condition of insured institutions between regular bank examinations. Data collected from each bank’s Call Report are subjected to a screening process in the EWS known as SCOR (Statistical CAMELS Off-site Rating). SCOR is an off-site model for insured institutions that compares an institution’s financial condition against examination ratings for comparable financial institutions. SCOR derives a rating for each component of the Uniform Financial Institutions Rating System (UFIRS). The composite and component ratings are then compared to those given at the last examination and a downgrade probability is derived for each institution. Those institutions whose downgrade probability exceeds a specified level are subject to supervisory follow-up procedures including the prompt scheduling of examinations or visitations. The FDIC also has developed two off-site rating tools called GMS (Growth Monitoring System) and REST (Real Estate Stress Test) in order to effectively and efficiently monitor risk to the banking and thrift system. GMS identifies institutions that may pose greater risks due to rapid growth and/or funding issues. GMS places institutions into percentile rankings based on GMS scores. Those with the highest GMS scores are subject to formal off-site review requirements similar to SCOR. REST identifies institutions with high concentrations of commercial real estate and other exposures similar to the exposure characteristics of problem banks and institutions that failed during the New England crisis of the late 1980s and early 1990s.

Another part of the EWS includes the Uniform Bank Performance System (UBPS). The UBPS is an on-line support subsystem that calculates for each commercial and savings bank approximately 300 financial ratios and accompanying peer group and ranking data and presents this information in a manner consistent with the Uniform Bank Performance Report, which is discussed below. The UBPS covers the most recent and preceding 15 quarters.

Uniform Bank Performance Report (UBPR) – This report is prepared quarterly for each insured commercial and savings bank from Call Report data and presents information for five periods on a bank’s performance and financial statement composition in the form of ratios, percentages, and dollar amounts. Each UBPR also includes corresponding average data for the bank’s peer group and percentile rankings for most ratios. The comparative and trend data contained in these reports complement the EMS data and are utilized for further off-premises review of individual banks, particularly at the field office level. Based on an analysis of the information in the UBPR, an examiner can set the priorities for the examination of a bank. The condition of a bank can then be evaluated during the examination in light of its recent trends and the examiner’s findings can be communicated to the bank’s management. Management can verify this trend data in the copies of its own bank’s UBPRs. UBPRs are available on-line on the Internet for access by banks, regulators, and the public.

ViSION and ARIS – ViSION is a secure web-enabled system that was developed as a comprehensive and easy-to-use reporting source for the FDIC’s supervisory and financial data. The system provides FDIC users with multiple reports that display information for a specific institution or set of institutions. ViSION provides users the ability to retrieve various supervisory and off-site reports. These various management reports are used to assist in off-site monitoring efforts and are reviewed at the regional or field office level on a regular basis. ARIS is a localized database and reporting system that includes many levels of drill-down management and supervisory reporting. ARIS reporting will eventually be phased into the ViSION system.

Through the use of monitoring and surveillance systems that rely on Call Report information, the FDIC is able to more effectively and efficiently allocate resources to those institutions experiencing difficulties. Also, FDIC policy requires examiners to use information from Call Reports as well as data available from monitoring and surveillance systems to assist in their pre-examination planning activities. Through pre-examination planning, examiners can determine the areas of a bank’s operations and activities on which to focus their attention during their time on-site at the bank. Moreover, effective pre-examination planning can help to limit the amount of time examiners need to spend on-site during an examination. These efforts would not be feasible if the Call Reports, with their present emphasis on the collection of data for supervisory and surveillance purposes, were not available on a quarterly basis.

The Call Reports also provide the most current statistical data available for evaluating statutory factors relating to the FDIC’s consideration of bank applications for deposit insurance and for consent to merge, to establish a branch, to relocate an office, and to retire capital. The FDIC’s deposit insurance and Financing Corporation assessments are based on deposit information and related data reported in the Reports of Condition. Moreover, the amount of each individual bank’s assessments is calculated directly by the FDIC from the deposit information and related data reported on the institution’s Call Report. In addition, under the FDIC’s risk-related insurance assessment system, Call Report data are used to help determine the risk category to which each insured institution should be assigned. The FDIC’s Division of Insurance and Research uses data collected in the Call Reports to prepare quarterly reports on the condition and performance of the banking system and for numerous economic studies and analyses of trends in banking that are incorporated into reports submitted to Congress and made available to the public.

3. Use of Technology to Reduce Burden

All banks are subject to an electronic filing requirement for Call Reports. In this regard, the agencies have created a secure shared database for collecting, managing, validating and distributing Call Report data. This database system, the Central Data Repository (CDR), was implemented on September 30, 2005, for the third quarter 2005 Call Report filing period and is the only method now available for banks to submit their Call Reports. Under the CDR system, banks file their Call Report data via the Internet using software that contains the FFIEC’s edits for validating Call Report data before submission.

4. Efforts to Identify Duplication

There is no other report or series of reports that collects from all commercial and savings banks the information gathered through the Reports of Condition and Income taken as a whole. There are other information collection systems which tend to duplicate certain parts of the Call Reports; however, the information they provide would be of limited value as a replacement for the Call Report.

For example, the FRB collects various reports in connection with its measurement of monetary aggregates, of bank credit, and of flow of funds. Reporting banks supply the FRB with detailed information relating to such balance sheet accounts as balances due from depository institutions, loans, and deposit liabilities. The FRB also collects financial data from bank holding companies on a regular basis. Such data is presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent company only basis.

However, FRB reports from banks are frequently obtained on a sample basis rather than from all insured banks. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability to the Call Report. Institutions below a certain size are exempt entirely from some FRB reporting requirements. FRB data collected from bank holding companies on a consolidated basis reflect an aggregate amount for all subsidiaries within the organization, both banking and nonbanking, so that the actual dollar amounts applicable to any bank subsidiary are not determinable from the holding company reports. Hence, FRB reports could not be a viable replacement for even a significant portion of the Call Reports since the FDIC, in its role as supervisor of insured state nonmember banks, would be lacking the data necessary to assess the financial condition of individual insured banks to determine whether there had been any deterioration in their condition.

As another example, banks with 500 or more shareholders are required by the Securities Exchange Act of 1934, as amended, to register their stock with their primary federal bank regulatory agency. Following the effective date of the stock registration, quarterly and annual reports, which contain financial statements, must be filed with the appropriate regulatory agency. Of the approximately 5,200 FDIC-supervised banks, about 70 have stock that is registered with the FDIC pursuant to the Securities Exchange Act. For this small number of registered state nonmember banks, quarterly and annual reports generally need not be filed until 45 days and 90 days after the report date, respectively, while Call Reports generally must be received no later than 30 days after the report date. Moreover, the Call Reports have a fixed format to permit industry data aggregation by computer and automated monitoring of each individual institution's performance and condition. The financial statement format for registered banks is comparable to that of the Call Report, but each bank has the flexibility to expand or contract the level of detail on individual items as circumstances warrant. Such free-form reporting would make it extremely difficult for the FDIC to substitute the registered bank quarterly and annual reports for Call Reports.

Finally, some of the information contained in the Call Report is also developed by FDIC examiners during regular safety and soundness examinations of insured banks. In addition, examiners check the Reports of Condition and Income the bank has submitted to the FDIC between examinations to ensure that the required data have been properly reported. However, using the examination process to develop quarterly Call Report data would be unworkable since one of the principal purposes of the supervisory and surveillance emphasis on the use of these data is for off-site monitoring of individual bank condition between examinations. Furthermore, examinations are conducted as of various dates throughout the year and at differing time intervals for different institutions. Thus, the examination process could not supply the banking agencies with financial data on a timely basis for all insured banks as of fixed dates each year.

5. Minimizing the Burden on Small Banks

There are approximately 5,200 insured state nonmember banks that file Call Reports. Of this number, about 2,450 have total assets of less than \$100 million. Banks of this size are generally considered “small” banks. As stated in Item 1 of this supporting statement, the Call Report requires the least amount of data from banks with less than \$100 million in total assets.

With respect to this submission, the agencies are proposing to change the way the assessment base is reported in the Call Report consistent with recent amendments to the FDIC’s assessment regulations. As a result, the 23 Call Report items presently required to determine a bank’s assessment base will be replaced with as few as two items for certain small institutions (without foreign offices) and no more than six for other institutions. In addition, the creation of a \$1 billion asset size threshold for requiring existing insured banks to report daily averages for total deposits (before allowable exclusions) as defined in the Federal Deposit Insurance Act and allowable exclusions for deposit insurance assessment purposes will benefit small banks. The new items on residential mortgage loans with negative amortization features include an item applicable to all banks that will disclose the volume of a bank’s holdings of these loans and three additional items that will be collected only from those banks whose negatively amortizing residential mortgages exceed a size threshold. This will exempt small banks (and large banks) with a limited volume of these nontraditional mortgages from the additional reporting requirements. The proposed new schedule on fair value measurements will be completed only by banks that elect to apply a fair value option to financial instruments and servicing assets and liabilities and from those institutions with a specified volume of trading assets. Small banks generally are not expected to elect to apply a fair value option, nor to have substantial trading assets, and therefore are not likely to have to complete the new fair value option and measurements schedule.

6. Consequences of Less Frequent Collection

Less frequent collection of Call Reports would reduce the FDIC’s ability to identify on a timely basis those banks that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. Such identification cannot be accomplished through periodic bank examinations alone. To allocate its

examination resources in the most efficient manner, off-site analysis of Call Report data to single out banks in need of on-site follow-up must be performed (see Section 2 above). Submission of the Reports of Condition and Income less frequently than quarterly would permit deteriorating conditions at banks to fester considerably longer before they would be detected through the FDIC's computer-based monitoring systems, through the fortunate scheduling of an examination, or by other means. Such banks would therefore run a greater risk of failure because of delays in effecting corrective action, either on the bank management's own initiative or at the behest of the FDIC.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On October 31, 2006, the agencies requested comment on proposed revisions to the Call Report. The agencies proposed to replace certain information currently collected in the Call Report for deposit insurance assessment purposes with the information described in proposed amendments to Part 327 of the FDIC's regulations (71 FR 28790, May 18, 2006). The agencies also proposed to revise the information collected in the Call Report on time deposits, particularly with respect to certain retirement accounts affected by the FDIC's amended deposit insurance regulations.

In addition, the agencies proposed to collect certain new data in the Call Report. These new reporting requirements are expected to be applicable to a small percentage of banks. First, the agencies proposed to create a new schedule for the collection of data on fair value measurements from those institutions that choose, under generally accepted accounting principles, to apply a fair value option to one or more financial instruments and one or more classes of servicing assets and liabilities and from certain institutions that report trading assets and liabilities. The agencies also proposed to add an item to the regulatory capital schedule for capital calculation purposes to capture the change in the fair value of liabilities accounted for under a fair value option that is attributable to a change in a bank's own creditworthiness. Second, in order to meet supervisory data needs, the agencies proposed to add four data items on 1-4 family residential mortgages with terms that allow for negative amortization, three of which would only be applicable to banks with a significant volume of such mortgages. Finally, the agencies proposed to clarify the Call Report instructions for assets serviced for others by explicitly stating that such servicing includes the servicing of loan participations.

The agencies collectively received comments from five respondents: one banking organization, one national banking trade association, a trade association of community organizations, a financial institution data processing servicer, and a government agency. All of these respondents except the government agency addressed the proposed reporting of information on 1-4 family residential mortgages with negative amortization features. The trade association of community organizations supported the collection of the total amount of these mortgages in the Call Report while the banking organization and the banking trade association addressed the proposal to collect certain additional data on these mortgages from banks with a significant volume of negatively amortizing residential mortgages. The data processing servicer commented on the proposed March 31, 2007, effective date for reporting this information.

With respect to the other proposed revisions to the Call Report, the banking organization stated that it "generally supports the Agencies' proposed changes" and the banking trade association expressed support for "the majority of changes proposed by the agencies." This latter commenter observed that the proposed changes to the data reported for deposit insurance

assessment purposes should be conformed to the FDIC's final rule on the operational procedures governing deposit insurance assessments that was published on November 30, 2006, which was after the proposed changes to the Call Report were published for comment on October 31, 2006. This commenter also urged the agencies to proceed cautiously with the proposed reporting schedule that would capture data on banks' use of the fair value option under a yet-to-be issued final accounting standard.

After considering the comments and other actions since the publication of the proposal, the agencies approved certain modifications to the initial set of proposed revisions. Subject to approval by OMB, the agencies will move forward with these modified reporting changes on March 31, 2007, and March 31, 2008. For the March 31, 2007, report date only, institutions may provide reasonable estimates for any new or revised Call Report item for which the requested information is not readily available.

For a more detailed discussion of the October 31, 2006, proposed changes, the comments received, and the agencies' responses, please refer to the "Current Actions" section (which starts on page 10) of the final Paperwork Reduction Act Federal Register notice for this submission.

9. Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Confidentiality

The data collected from individual banks in the Call Report are publicly available with the exception of select sensitive information. The agencies currently accord confidential treatment on an individual bank basis to the data collected in Schedule RC-T, Fiduciary and Related Services, on fiduciary and related services income (items 12 through 23) and fiduciary settlements, surcharges, and losses (Memorandum item 4). Contact information for bank personnel that is provided in banks' Call Report submissions also is not available to the public.

11. Information of a Sensitive Nature

The Call Report contains no questions of a sensitive nature.

12. Estimate of Annual Burden

It is estimated that, on average, it will take an FDIC-supervised bank approximately 35.27 hours each quarter to prepare its Call Report as it is proposed to be revised in this submission. There are currently 5,234 FDIC-supervised banks. The estimated annual reporting burden for these FDIC-supervised banks is 738,413 hours. This annual reporting burden has been estimated by

considering the varying numbers of items potentially reportable by banks of different sizes and with foreign offices and the extent to which such banks will actually have amounts to report in these items as a result of the activities and transactions in which they are engaged. Then, based on the agency staff's understanding of banks' recordkeeping and reporting systems and their customary and usual business practices, professional judgment has been applied to arrive at a burden estimate for the Call Report.

For FDIC-insured commercial banks, salaries and employee benefits per full-time equivalent employee currently average about \$33.75 per hour. Thus, the annual recurring salary and employee benefit cost to state nonmember banks for the Call Report burden hours shown above is estimated to be \$24.9 million. This cost is based on the application of the \$33.75 average hourly rate to the estimated total hours of annual reporting burden of 738,413.

13. Estimate of Total Annual Cost Burden

Banks maintain extensive internal recordkeeping systems from which financial statements and tax returns are prepared and other reports are generated so that bank management can keep informed about the bank's condition and performance and have the data necessary to operate their bank in a safe and sound manner. These records also serve as a source for the data submitted in the Call Reports, although banks generally maintain some records solely to enable them to complete these reports. Computerized banks commonly have software and programs that compile data that need to be reported in the Call Report. Bank records may be generated and processed internally, externally by an outside servicer, or by a combination of both methods. In addition, virtually all banks now use software to assist in the actual preparation of the Call Report. The total operation and maintenance and purchase of services component of the total annual cost burden to state nonmember banks (excluding costs included in Item 12 above) is estimated to be \$18.5 million. This cost is based on the application of an average hourly rate of \$25.00 to the estimated total hours of annual reporting burden of 738,413. This estimate reflects recurring expenses (not included in Item 12 above) incurred by banks in the Call Report preparation and filing process, including expenses associated with software, data processing, and bank records that are not used internally for management purposes but are necessary to complete the Call Reports.

With respect to the changes that are the subject of this submission, the proposed revisions to the deposit insurance assessment information will affect all banks, either in 2007 (at a bank's option) or in 2008. The underlying data to support these revised reporting requirements are contained in banks' information systems because they are inputs to the more extensive number of data items currently collected for assessment information purposes. Nevertheless, banks will need to adjust their process for reporting these assessment data under the proposed simplified approach. Banks that will be required to report daily averages for their assessment data beginning in 2008 (in general, banks with \$1 billion or more in total assets), and those that opt to do so (either in 2007 or thereafter), will also need to make appropriate changes to support these calculations.¹ The proposed revisions to the time deposit information for certain retirement

¹ For institutions that report daily averages for the quarter, quarter-end data on total deposits as defined in the

accounts will affect most banks, but, as with the data for assessment purposes, the underlying time deposit data should already be contained in banks' information systems. In contrast, a minority of banks will need to complete the new schedule on fair value measurement data and one or all of the new items on negatively amortizing residential mortgages. The clarification of the instructions for reporting loan participations serviced for others will eliminate diversity in reporting and will affect those banks that had not previously interpreted the instructions as covering participations. Therefore, banks will incur a capital and start-up cost component to implement the proposed reporting revisions, but the amount will vary from bank to bank depending upon a bank's individual circumstances, most notably whether it elects to apply a fair value option to financial and servicing assets and liabilities and whether it acquires and holds negatively amortizing residential mortgages. An estimate of this cost component cannot be determined at this time.

14. Estimate of Total Annual Cost to the Federal Government

The current annual cost to the FDIC of the Call Report information collection system is estimated to be not more than \$8.0 million. This amount includes the cost of:

- developing reporting requirements, instructions, and data validation edits;
- designing, printing, and distributing forms and instructions;
- computer processing and hosting, including maintaining and modifying software programs, associated with the CDR system for collecting and validating Call Reports; and
- FDIC personnel involved in the preceding tasks and in the review and validation of reported data.

The cost to implement the Call Report revisions that are the subject of this submission are encompassed within this annual cost and are not separately identifiable.

15. Reason for Change in Burden

The change in burden associated with this submission is caused by two factors: (a) a net decrease in the number of reporting institutions, and (b) the changes to the Call Reports that are the subject of this submission.

Currently, there are 5,234 FDIC-supervised banks submitting quarterly Call Reports. This number is 13 less than previously reported (5,247 previously versus 5,234 now). The reporting changes proposed for deposit insurance assessment information will apply to all banks, but represents a simplification and a reduction in the number of data items reported for purposes of the FDIC's calculation of institutions' deposit insurance assessment bases. The other proposed revisions involve the reporting of new data items, but these revisions will generally affect a

Federal Deposit Insurance Act and allowable exclusions remains necessary because the agencies use Call Report data in evaluating interstate merger and acquisition applications to determine, as required by law, whether the resulting institutions would control more than ten percent of the total amount of deposits of insured depository institutions in the United States.

limited number of banks on an ongoing basis. Thus, the FDIC estimates that the overall effect of the proposed reporting revisions across the range of banks under its supervision would be an average increase of one quarter hour per response. The analysis of the change in burden is as follows:

Currently approved burden	735,000 hours
Revisions to content of report (program change)	+5,234 hours
<u>Adjustment (change in use)</u>	<u>-1,821 hours</u>
Requested (new) burden:	738,413 hours
Net change in burden:	+3,413 hours

The impact of the reporting changes covered by this submission will vary from bank to bank depending upon a bank's individual circumstances and the extent of its involvement, if any, with the particular type of activity or product that is the subject of a proposed reporting revision.

16. Publication

The information collected in Call Reports from FDIC-supervised banks is primarily intended to meet the FDIC's internal needs (see Item 2 above). However, except for items afforded confidential treatment (see Item 10 above), the FDIC makes individual banks' entire Call Reports available to the public on the Internet. (These data can be accessed at present at www.fdic.gov. Beginning with the March 31, 2007, Call Report, the agencies plan to begin posting individual bank data on the CDR Public Data Distribution Web site.)

Summary statistical data that provide a financial profile of each individual FDIC-insured bank and savings association are available to the public on the Internet. For banks, the financial information is taken from the Call Report and includes balance sheet, income statement, and other key data for several periods. Regulatory capital ratios and profitability ratios such as return on assets and return on equity are also provided. In addition, interested persons can purchase a computer tape containing the quarterly Call Report information for all banks from the National Technical Information Service of the U.S. Department of Commerce.

Call Report data also form the basis for certain quarterly FDIC publications, including the Quarterly Banking Profile and Statistics on Banking, which present a variety of statistical data on the banking industry. These publications are available on the Internet.

The Uniform Bank Performance Report (UBPR), which is computer-generated using Call Report data as its primary input (see Item 2 above), is also publicly available for individual banks on the FFIEC's Web site (at www.ffiec.gov).

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.

Attachments:

1. Initial Paperwork Reduction Act Federal Register Notice (October 31, 2006)
2. Final Paperwork Reduction Act Federal Register Notice (February 14, 2007)
3. Legal Authority (12 U.S.C. 1817(a))