

### **Justification for Nonsubstantive Change**

This nonsubstantive change is being made in conjunction with the final rule on Identity Theft Red Flags. 72 FR 63718 (November 9, 2007). The OCC is adjusting the number of respondents to the current number of regulated entities and the burden estimates for training, in response to comments received.

The number of respondents at the time the proposed rule was issued was 2,100, the number of institutions regulated by the OCC. Under the final rule, the number of respondents was reduced to 1,806, the current number of institutions.

Several commenters stated that staff training estimates were significantly underestimated. In response to this, the OCC has increased the estimated burden hours for training from 2 to 4 hours.

Many of the other comments received regarding burden stemmed from commenters' misreading of the requirements of the proposed rulemaking. The final rulemaking clarifies these requirements, including those that relate to the information collections.