

Supporting Statement
OMB Control No. 1557-0223
Assessment of Fees – 12 CFR Part 8

Justification

1. Circumstances that make the collection necessary:

The National Bank Act authorizes the Office of the Comptroller of the Currency (OCC) to collect assessments, fees, or other charges as necessary or appropriate to carry out the responsibilities of the OCC. 12 U.S.C. 482. The statute requires the OCC's charges be set to meet the Comptroller's expenses in carrying out authorized activities. The OCC, under part 8, currently assesses national banks and Federal branches and agencies according to a formula based on factors that affect the cost of our supervision, including a bank's size, condition, and whether it is the "lead" bank or "non-lead" bank among national banks in a holding company.

The OCC's regulations distinguish independent credit card banks chartered by the OCC from other national banks. Many independent credit card banks sell or securitize their receivables, thereby removing those assets from their books. Independent credit card banks pay an additional assessment based on receivables attributable to accounts owned by the bank. The OCC needs the information covered by this request to determine the accuracy of each bank's assessment computation. To implement the assessment, the OCC collects receivables-attributable data from independent credit card banks, meaning national banks that primarily engage in credit card operations and are not affiliated with a full-service national bank. "Receivables attributable" are the total amount of outstanding balances due on credit card accounts owned by an independent credit card bank (the receivables attributable to those accounts) on the last day of an assessment period.

2. Use of the information:

The OCC will use the information to verify the accuracy of each bank's assessment computation to adjust the assessment rate for independent credit card banks over time.

3. Consideration of the use of improved information technology:

Banks are invited to propose the use of any existing technology appropriate for preparing and submitting the information.

4. Efforts to identify duplication:

The information collected is unique. Independent credit card banks maintain this type of information for other business reasons. Therefore, the information is readily available to these banks for purposes of calculating their assessment.

5. Methods used to minimize burden if the collection has a significant impact on small business or other small entities:

This information collection does not have a significant impact on a substantial number of small entities.

6. Consequences to the Federal program if the collection were not conducted or conducted less frequently:

The information collection is the minimum necessary to allow the OCC to assess these banks and to monitor and adjust the level of assessments over time.

7. Special circumstances necessitating collection inconsistent with the guidelines in 5 CFR 1320.6:

The collection is consistent with 5 CFR 1320.6.

8. Efforts to consult with persons outside the agency:

On October 26, 2007, the OCC published a 60-day notice on the extension of OMB approval of the information collection (72 FR 60931). The OCC received no comments.

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

No assurance of confidentiality is given.

11. Justification for questions of a sensitive nature:

There are no questions of a sensitive nature.

12. Burden estimate:

The OCC estimates the burden as follows:

11 respondents @ 2 respondents per year = 22 responses
22 responses @ 1 hour = 22 burden hours

The OCC estimates the cost of the hour burden to respondents as follows:

Clerical: $100\% \times 22 @ \$20 = \440
Total Cost to Respondents = \$440

13. Estimate of annualized cost to respondents:

None.

14. Estimate of annualized cost to the Federal government:

None.

15. Changes in burden:

Previous Burden:

35 respondents @ 2 responses per year = 70 responses

70 responses @ 1 hour = 70 burden hours

Current Burden:

11 respondents @ 2 responses per year = 22 responses

22 responses @ 1 hour = 22 burden hours

Change:

-24 respondents; -48 responses; - 48 burden hours

The decrease is due to the change in the number of independent credit card banks.

16. Information regarding collections whose results are planned to be published for statistical use:

The OCC has no plans to publish the data for statistical purposes.

17. Approval to not display expiration date of OMB approval:

Not applicable.

18. Exceptions to certification statement:

None.

B. Collections of Information Employing Statistical Methods

Not applicable.