

**Supporting Statement for
OMB Control Number 1557-0081
(MA)-Reports of Condition and Income (Interagency Call Report)**

A. Justification

1. Circumstances that make the collection necessary:

Reports of Condition are required under 12 U.S.C. 161. The OCC needs this information to ensure individual bank and banking system safety and soundness.

This submission covers the revisions to the Call Report to be implemented on March 31, 2008, with the exception of certain proposed new items that will be optional for this initial report date.

The revisions include:

- Reporting of Data for Deposit Insurance Assessments in the Call Report by Newly Insured Institutions
- Separate reporting of Interest and Fee Income and Quarterly Average for 1-4 Family Residential Mortgages
- Separate Reporting on Restructured Mortgages for 1-4 Family Residential Mortgages
- Reporting of 1-4 family Residential Mortgages in Foreclosure
- Open-End 1-4 Family Residential Mortgage Banking Activities
- Reporting of 1-4 Family Residential Mortgage Repurchases and Indemnifications
- Data on Trading Assets and Liabilities and Other Assets and Liabilities under Fair Value Option
 - Reporting of Assets and Liabilities under the Fair Value Option as Trading
 - Revisions of Certain Fair Value Measurement and Fair Value Option Information
 - Other Revisions Relating to Trading Assets and Liabilities
- Instruction Change for Reporting Credit Derivative Data for Risk-Based Capital Purposes
- Revision of Reporting Threshold for Other Noninterest Income and Other Noninterest Expense in the Call Report
- Instructional Change for Reporting Brokered Time Deposits Participated Out by the Broker in the Call Report

The revisions to the Call Report were proposed to take effect as of March 31, 2008. After considering the comments received on the proposal, the banking agencies decided that the proposed revision to the Call Report instructions for reporting daily average deposit data by newly insured institutions for deposit insurance assessment purposes would be implemented March 31, 2008, as proposed. With respect to the remaining proposed revisions, which apply only to the Call Report, the banking agencies approved certain modifications to them to address concerns expressed by commenters. The banking agencies will move forward with the modified reporting changes on March 31, 2008, although the reporting of certain proposed new items will

be optional for this initial report date and will be required beginning June 30, 2008. For the March 31, 2008, report date, institutions may provide reasonable estimates for any new or revised Call Report item required to be reported as of that date for which the requested information is not readily available. For the new Call Report items that are optional as of the March 31, 2008, report date, this same policy on the use of reasonable estimates will apply to these new items as of the June 30, 2008, report date.

2. Use of the information:

Data from Call Reports are shared among the agencies and placed in each agency's computerized databases for supervisory and industry monitoring purposes. Also, Call Report data are used by the FDIC in preparing the comprehensive interagency Uniform Bank Performance Reports (UBPRs). UBPRs are produced quarterly for each insured commercial bank.

The banking agencies use the information, as an aid, to determine the safety and soundness of individual financial institutions and to identify trends in the banking system. The data are input into a data base and analyzed both by the computer and by examiners. The data are used for peer analysis of banks, to determine strengths and weaknesses in a particular institution as compared to similar institutions. The data also are used in scheduling bank examinations and in determining areas of focus for the examiners during their on-site visit.

The Call Report is the major source of financial information on individual banks and the industry and assists the OCC in discharging its responsibility to maintain a safe and sound banking system. In addition, Call Reports provide the most current statistical data available for evaluating bank applications for actions as mergers and establishing branches, for numerous economic studies and analyses in regards to banking, reports submitted to Congress, and for public data use.

Call Report data are also used by bank management to evaluate their institutions, by bank analysts and investors, and by the public in determining the desirability of investing or making deposits in a particular bank.

3. Consideration of the use of improved information technology:

All banks are required to submit their Call Reports electronically through the banking agencies "Central Data Repository", using the Internet. Currently, a bank must file its Call Report in one of two ways:

- A bank may use computer software to prepare and edit its report data and then electronically submit the data directly to the CDR (<http://cdr.ffiec.gov/cdr/>)
- A bank may complete its report in paper form and arrange with a software vendor or another party to convert its paper report into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank's Call Report data file to the CDR.

Regardless of the method a bank uses to file its Call Report, the bank remains responsible for the accuracy of its Call Report data. The information collections under this process facilitates more accurate bank Call Report data submission.

Since June 1998, quarterly Call Report submissions have been made available to the public on the Internet. Call Report formats and instructions have been made available to the banks and others on the Internet.

The banking agencies implemented a new Central Data Repository for the collection and processing of bank Call Reports effective with the September 30, 2005 Call period. One of the principle features of the new business model is the use of Extensible Business Reporting Language (XBRL). XBRL is a new XML-based specification that uses accepted financial reporting standards and practices to exchange financial statements across all software and technologies, including the Internet.

4. Efforts to identify duplication:

This information is unique because no other report or a series of reports provides all the Call Report data from all the national banks in a consistent and timely manner.

5. Methods used to minimize burden if the collection has a significant impact on substantial number of small entities:

Only the minimum information needed to evaluate the condition of a bank, regardless of size, is required.

6. Consequences to the Federal program if the collection were conducted less frequently:

Under 12 U.S.C. 161, quarterly reporting is required in some instances. Further, the Federal financial regulatory agencies must have condition and income data at least quarterly to properly monitor individual bank and industry trends. Less frequent collection of this information would impair the agencies' monitoring and seriously delay regulatory response.

7. Special circumstances necessitating collection inconsistent with 5 CFR Part 1320:

This collection is conducted in accordance with the guidelines in 5 CFR Part 1320.

8. Efforts to consult with persons outside the agency:

On September 11, 2007, the OCC, FDIC, FRB, and the OTS published a joint notice soliciting comments for 60 days on proposed revisions to the Call Report (72 FR 51814). The agencies collectively received comments from nine respondents. A detailed discussion of these comments and the agencies' response to the comments is included in the 30-day Federal Register notice (February 4, 2008 (73 FR 6506)).

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

The data collected from individual banks in the Call Report are publicly available with the exception of certain sensitive information. The agencies currently give confidential treatment to 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 on bank personnel that is provided in each bank's Call Report submission is also provided confidential treatment. All non-confidential Call Report data on individual banks is available on request from the Federal Financial Institutions Examinations Council (FFIEC) and on the FFIEC Internet Web-site.

11. Justification for questions of a sensitive nature:

None.

12. Burden estimate:

The OCC estimates that 1,750 national banks will file Call Reports each quarter and that the burden will average 182 burden hours per year. An individual bank's actual burden may be higher or lower, depending on the complexity of the bank's structure and the degree of accounting system automation.

The OCC estimates total burden as follows:

1,750 respondents @ 4 responses = 7,000 annual responses
7,000 responses @ 45.42 hours = 317,967 burden hours

13. Estimate of annualized costs to respondents:

Not applicable.

14. Estimate of annualized costs to the government:

Not applicable.

15. Changes in burden:

Former burden: 1,900 respondents @ 4 responses = 7,600 annual responses
7,600 responses @ 44.33 hours = 336,925 burden hours

New burden: 1,750 respondents @ 4 responses = 7,000 annual responses
7,000 responses @ 45.42 hours = 317,967 burden hours

Change: - 150 hours per response; -18,958 burden hours

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

Clerical:	20% x 317,967 =	63,593.4 @ \$20	= \$ 1,271,868.00
Managerial/technical:	65% x 317,967=	206,678.55 @ \$40	= \$ 8,267,142.00
Senior mgmt/professional:	14% x 317,967=	44,515.38@ \$80	= \$ 3,561,230.40
Legal:	01% x 317,967=	3,179.67 @ \$100	= \$ 317,967.00
Total:			<u>\$13,418,207.40</u>

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

Not applicable.

17. Approval to not display OMB expiration date.

Not applicable.

18. Exceptions to certification statement.

None.

B. Collections of Information Employing Statistical Methods.

Not applicable.