## SUPPORTING STATEMENT DEPOSITS AND SAVINGS ACCOUNTS BY OFFICE OMB Control No. 1550-0004

# A. JUSTIFICATION

### 1. Circumstances and Need

This survey provides the only balance sheet information for individual branch offices of OTS regulated institutions that is collected by the OTS. Such data is essential to derive market share information for small geographic areas because many institutions have offices over a much wider area, including out-of-state facilities.

This information is needed by OTS staff to evaluate the competitive impact of merger, acquisition, branching and chartering applications that OTS must act upon under the Home Owners' Loan Act (HOLA), 12 U.S.C. 1464, et seq. Analysis of the anti-competitive impact of mergers and branching is implicitly required by Section 7 of the Clayton Act and the Bank Merger Act for all thrift institutions and by the HOLA for acquisitions by thrift holding companies.

#### 2. Use of Information Collected

This survey provides the only financial information by individual branch offices for OTS regulated institutions and is comparable to data collected by the FDIC for banks. The data is essential to determine market shares of institutions in local market areas, and is used for anti-competitive analysis by OTS, FDIC, FRB, OCC and DOJ. The information is also used to small geographic area analysis by OTS staff, other federal agencies, financial institutions and financial consultants. The information is collected annually through a completely automated process.

### 3. Use of Technology to Reduce Burden

This survey provides the most efficient method of obtaining the desired data as it has been completely automated. The data is collected by electronic transmission using software provided by the OTS at no charge to the institutions. The software is developed and maintained by OTS staff.

### 4. Efforts to Identify Duplication

There is no duplication of efforts. This is the only survey requesting deposit balances for individual offices.

### 5. <u>Minimizing the Burden on Small Firms</u>

The statutory provisions do not distinguish a respondent by the size of its assets.

## 6. <u>Consequences of Less Frequent Collection</u>

Collection of the information less frequently than annually could significantly impact the accuracy of the anti-competitive analysis especially during periods of sizable structural shifts such as mergers, branch office purchases and sales, and in financial flows.

# 7. <u>Special Circumstances</u>

This information collection is in accordance with 5 C.F.R. Section 1320.6.

## 8. Consultations with Persons Outside OTS

Notice of intent to renew this information collection was published in the <u>Federal Register</u> on January 28, 2008 (Volume 73, Number 15, page 4951). OTS has not received and comments.

## 9. Payment of Respondents

The OTS provides no payment or gift to respondents.

### 10. Confidentiality

No assurances of confidentiality are provided to responders. Individual reports are public information and made available on the FDIC Internet website.

### 11. Information of a Sensitive Nature

There are no questions of a sensitive nature in the report.

### 12. Estimate of Annual Hour Burden

Total reporting hours are estimated to be 408 hours. Reporting burden varies widely among institutions based on the number of branch offices. For purposes of this report, the average response time is calculated to be one-half hour per respondent.

### 13. Estimate of Annual Cost

The annualized cost for respondents is estimated to be \$20,400 based on an average response time of one-half hour multiplied by the number of respondents, 816, at an hourly cost of \$50 for technical staff. The hourly cost includes salaries, benefits, and overhead costs to complete the report.

## 14. Estimate of Annualized Cost to Government

The annualized cost to the federal government is estimated to be approximately \$100,000. This amount includes the salaries, benefits, and overhead costs of OTS staff associated with the collection, along with the necessary technical staff for continued software development and support.

## 15. Reason for Change in Burden

OTS is citing a reduction in burden due to a reduction in the number of respondents.

## 16. Publication

Data is reported as of June 30 and due at OTS on the fourth Monday of August. Reports are subject to extensive edit to ensure accuracy, with validation scheduled for completion by the end of September. After further review and tabulation, the aggregate data is published and individual institution information is made available to the general public through the FDIC Summary of Deposits website as well as the purchase of tapes through the NTIS.

### 17. Expiration Date

The OTS has been granted permission to not display expiration dates.

### 18. Exceptions

There are no exceptions to the certification on OMB form 83-1.

# B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed in the collection of the data. Each institution is surveyed to determine actual balances as of June 30 of that year.