

Office of the Comptroller of the Currency
Supporting Statement
Customer Complaint Form
OMB Control No. 1557-0232

A. Justification.

1. Circumstances that make the collection necessary:

The customer complaint form was developed as a courtesy for those that contact the Office of the Comptroller of the Currency's Customer Assistance Group and wish to file a formal, written complaint. The form allows the consumer to focus its issues and provide a complete picture of their concerns, but is entirely voluntary. It is designed to prevent having to go back to the consumer for additional information, which delays the process. Completion of the form allows the Customer Assistance Group to process the complaint more efficiently.

This collection of information is solicited pursuant to the Federal Trade Commission Act, 15 U.S.C. 57a(f)(1), the purpose of which is to prevent unfair or deceptive acts or practices in or affecting commerce, including acts or practices which are unfair or deceptive to consumers by banks. Agencies must establish a separate division of consumer affairs to receive and take appropriate action upon complaints with respect to such acts or practices by banks subject to its jurisdiction.

In an effort to streamline the customer complaint process, the OCC has been developing an online version of the Customer Complaint Form. However, the form was not ready in time to include it in the three-year renewal package recently cleared by OMB. It is now ready and we propose to implement it with several technical changes to the existing form. The changes are outlined in the Justification for No Material/Nonsubstantive Change.

2. Use of the information:

The Customer Assistance Group will use the information to create a record of the consumer's contact, including capturing information that can be used to resolve the consumer's issues and provide a database of information that is incorporated into the OCC's supervisory process.

3. Consideration of the use of information technology:

Respondents may use any available information technology to complete the form. In July 2007, the CAG launched www.HelpWithMyBank.gov. The Web site was created to assist customers of national banks and other financial institutions with questions common to all banking customers. The consumer will have the option to file a complaint using an on-line form for which they will receive an email confirmation or download a PDF form that can be completed and mailed or faxed to the Customer Assistance Group. The OCC's www.occ.gov

site also provides a link to the www.HelpWithMyBank.gov site.

4. Efforts to identify duplication:

The information required is unique and is not duplicated elsewhere.

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

Not applicable.

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

Less frequent collection would substantially impair the effectiveness of the program.

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

The information collection is conducted in accordance with OMB guidelines in 5 CFR Part 1320.

8. Efforts to consult with persons outside the agency:

No consultations were made outside the agency.

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

There is no assurance of confidentiality.

11. Justification for questions of a sensitive nature:

The form contains requests for personal identifiable information such as the consumer's name, address, telephone number(s), and email address. This information is needed to process the complaint.

12. Burden estimate:

22,000 respondents @ 1 response = 22,000 responses
22,000 responses @ 0.083 hour = 1,833 burden hours

The estimated cost of the reporting and disclosure hour burden is as follows:

1,833 burden hours @ \$20 = \$ 36,667

13. Estimate of annualized costs to respondents:

Not applicable.

14. Estimate of annualized costs to the government:

Not applicable.

15. Changes in burden:

Former:	14,000 respondents;	14,000 responses;	925 hours
New:	22,000 respondents;	22,000 responses;	1,833 hours
Difference:	+ 8,000 respondents;	+ 8,000 responses;	+ 908 hours

Reason for change in burden: We implemented a new procedure, which resulted in more consumers receiving the form. Each time a consumer contacted our office via phone, we mailed them a complaint form. Additionally, in July 2007, the CAG launched www.HelpWithMyBank.gov. The Web site was created to assist customers of national banks and other financial institutions with questions common to all banking customers. The consumer will have the option to file a complaint using an on-line form for which they will receive an email confirmation or download a PDF form that can be completed and mailed or faxed to the Customer Assistance Group. The OCC's www.occ.gov site also provides a link to the www.HelpWithMyBank.gov site.

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

No publication for statistical use is contemplated.

17. Display of expiration date:

Not applicable.

18. Exceptions to certification statement:

Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.