A. JUSTIFICATION

Purpose: Justification for an electronic process for selling/issuing, servicing, and making payments on or redeeming U.S. securities

1. Explain the circumstances that make this collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Chapter 31 of Title 31 of the United States Code authorizes the Secretary of the Treasury to prescribe the terms and conditions, including the form of issue, of United States Treasury certificates of indebtedness.

2. Indicate how, by whom and for what purpose is this information used?

The Bureau of the Public Debt (Public Debt) will use the information to establish new Treasury Direct accounts and process any associated transactions

3. Describe whether, and to what extent this collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?

Collection of the data in an online system removes the burden of the processing of paper requests. The collection of the information is done one time for numerous purchases removing the requirement to submit the same data each transaction. The customer can view his information on-line at his convenience eliminating the processing of paper inquiries to obtain the number and status of any given security. The greatest advantage of this change is a direct relationship with our customers while promoting their self-reliance for account maintenance. Treasury Direct provides a one-stop shopping experience for our customers where they can buy and manage their savings bonds, T-bills, notes and bonds totally online.

4. Describe efforts are used to identity duplication? Why can't any similar information already available be used or modified for use for the purposes described in Item 2 above?

The process will be reviewed annually to identify duplicate information. Where possible, the collection of the information is done one time for numerous purchases removing the requirement to submit the same data each transaction.

5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?

N/A

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

Eventually, the TreasuryDirect system will be the only way an individual can purchase securities directly from the Federal government. The government uses these purchases to help manage the national debt and finance its services.

7. Is this collection of information conducted in a manner consistent with the guidelines of 5 CFR 1320.6?

The collection of information cannot be conducted less frequently because the collection is initiated for more than one specific transaction.

8. What effort was made to notify the general public about this collection of information?

The Bureau's notice was published in the Federal Register on February 19, 2009, page 7746. No comments were received.

9. What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?

N/A.

10. What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?

In accordance with the Privacy Act of 1974, information furnished by the public is assured confidentiality.

11. What justification is there for questions of a sensitive nature?

There are no questions of a sensitive nature.

12. What is the estimated hour burden of this collection of information?

Estimating the burden hours of Treasury Direct transactions processed throughout FY08

Based on an analysis of user interaction with the TreasuryDirect system the typical user took:

- an average of six minutes to complete an account establishment transaction; and
- an average of two minutes to complete an account update transaction.

These are averages based on the fact that initial transactions require more time than updates to existing information Based on these findings:

The total FY08 burden hours for the TreasuryDirect should be:

• Initial Account establishment

Description	Total Transactions	Total Burden Hours
Establishing new primary accounts, 6 minutes each	140,000	14,000
Establishing new linked accounts, 3 minutes each	27,000	1,350
Certifying new primary accounts that failed verification, 5 minutes each	11,000	917
Sub-Total	178,000	16,267

Account update transactions

Description	Total Transactions	Total Burden Hours
Sales, 2 minutes each	1,004,000	33,467
Redemptions without Customer Service (CS) assistance, 2 minutes each	517,000	17,233
Redemptions with CS assistance, 30 minutes each	27,000	13,500
Transfers (internal and external), 2 minutes each	77,000	2,567
Banking information updates, 2 minutes	56,000	1,867
Account updates and other transactions without CS assistance, 2 minutes	191,000	6,367
Account updates and other transactions with CS assistance, 30 minutes	11,000	5,500
Sub-Total Sub-Total	1,883,000	80,501

Total estimated burden hours for FY08: 96,768

13. What is the estimated total annual cost burden to respondents or record keepers resulting from this collection of information?

The estimated cost burden to respondents is not available.

14. What is the annualized cost to the Federal Government?

Projected costs of operation for the Treasury Direct system for FY08 are 5.243 million dollars. Actual costs for the paperwork burden to the system are not available.

15. What is the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I?

Previous projections were prepared, however for FY 09 forecast, we now have considerable production statistics to prepare a more accurate estimate.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

The results of the collection of this information will not be published for statistical use.

17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?

N/A.

18. What are the exceptions to the certification statement?

N/A.