

SUPPORTING STATEMENT FOR RULES 7a-15 THROUGH 7a-37
UNDER THE TRUST INDENTURE ACT

A. Justification

1. Necessity of Information Collection

Rules 7a-15 through 7a-37 under the Trust Indenture Act of 1939 (“TIA”) set forth requirements governing the form and content and applications for exemption filed pursuant to Section 304(c) or 304(d) of the TIA, applications for qualification of indentures filed pursuant to Section 307 of the TIA, statements of eligibility and qualifications of trustees filed pursuant to Section 305, 307 or 310(a) of the TIA, applications for the stay of the trustee’s duty to resign filed pursuant to Section 310(b) of the TIA, and reports filed pursuant to Section 314(a) of the TIA.

2. Purposes of, and Consequences of not Requiring, the Information Collection

Trust Indenture Act Rules 7a-15 through 7a-37 do not directly impose any information collection requirements. Rather, they set forth guidelines as to how to prepare information required by various TIA forms. The information required by the TIA forms is necessary to determine whether the requirements of the TIA are satisfied.

3. Role of Improved Information Technology and Obstacles to Reducing Burden

The Commission collects information electronically through its Electronic Data Gathering, Analysis and Retrieval (EDGAR) system.

4. Efforts to Identify Duplication

The Trust Indenture Act Rules 7a-15 through 7a-37 are disclosure guidelines and the rules do not directly result in any collection of information. The forms to which these rules relate (for which separate OMB submissions are made) are filed only once and similar information does not exist.

5. Effect on Small Entities

Not applicable.

6. Consequences of Less Frequent Collection

Trust Indenture Act Rules 7a-15 through 7a-37 are disclosure guidelines and do not directly result in any direction of information. The forms to which the rules relate (for which separate OMB submissions are made) are filed only once and fewer collections would not satisfy statutory mandates.

7. Inconsistencies with Guidelines in 5 C.F.R. 1320.5

Not applicable.

8. Consultation Outside the Agency

Trust Indenture Act Rules 7a-15 through 7a-37 were proposed for public comment. No public comments were received during the 60-day comment period prior to OMB's review of this submission.

9. Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality

All documents filed with the Commission are public documents.

11. Sensitive Questions

Not applicable.

12. Estimate of Respondent Reporting Burden

Trust Indenture Act Rules 7a-15 through 7a-37 are assigned one burden hour for administrative convenience because the regulations simply prescribe the disclosure that must appear in other filings under the Trust Indenture Act.

13. Estimate of Total Annualized Cost Burden

Trust Indenture Act Rules 7a-15 through 7a-37 do not directly impose any costs on respondents.

14. Estimate Cost to the Federal Government

Not applicable.

15. Explanation of Change in Burden

Not applicable.

16. Information Collection Planned for Statistical Purposes

Not applicable.

17. Explanation as to Why Expiration Date Will Not Be Displayed

Not applicable.

18. Exception to Certification

Not applicable.

B. Collection of Information Employing Statistical Data

Not applicable.