

## SUPPORTING STATEMENT

### SUMMARY OF DEPOSITS

(OMB No. 3064-0061)

#### BACKGROUND

The FDIC is requesting OMB approval to revise the currently-approved information collection captioned above. OMB approval for the collection expires on November 30, 2011. The information collection requirements are not contained in FDIC rules.

The annual Summary of Deposits (SOD) survey is completed as of June 30 each year by FDIC-insured commercial banks, FDIC-supervised savings banks, and insured branches of foreign banks. The SOD is a report on the amount of deposits for each authorized office of an insured bank with branches; banks without branches do not report. All data collected on the SOD submission are available to the public. The survey data provides a basis for measuring the competitive impact of bank mergers and has additional use in research in banking. The data is collected electronically or on Form FDIC 8020/05 (7-95), SUMMARY OF DEPOSITS AS OF CLOSE OF BUSINESS JUNE 30.

Savings associations currently filing data through the Branch Office Survey System (BOS) with the OTS will convert to filing data through the Summary of Deposits Survey (SOD) with the FDIC. The BOS and the SOD are currently-approved collections of information.

#### A. JUSTIFICATION

##### 1. Circumstances and Need

There is constant and considerable consolidation within the banking and thrift industries, some of which involves very large banks with many branches. This constant change in banking market structure makes it necessary for the federal bank regulatory agencies to be able to evaluate the effect of the change on bank competition and on the structure of the market itself. Data on the amount of deposits held by each bank and branch office in the United States provides the banking agencies with the information necessary for delineating banking markets and for evaluating the effects on bank competition and market structure of proposed new banks openings or mergers. The FDIC is authorized to collect this data under section 9 (Eighth) of the Federal Deposit Insurance Act (12 U.S.C. 1819) which gives the Corporation the power to require information and reports from banks to carry out its statutory responsibilities regarding bank supervision. The survey has been conducted on a yearly basis since 1972.

##### 2. Use of Information Collected

The primary use of SOD data is to analyze the antitrust implications of proposed bank mergers and acquisitions and for market share analysis. The major users include the federal banking agencies, the antitrust division of the Department of Justice and the proponents to proposed transactions. In addition, the data is widely used by banks, consulting firms, law firms and others who are involved in various types of banking and thrift analysis.

The FDIC Library, Division of Insurance and Research and the Public Information Center receive a number of requests from outside the FDIC for Summary of Deposits information. The information is also available directly to the public from the FDIC's website.

3. Use of Technology to Reduce Burden

Financial institutions submit the survey to the FDIC electronically using the FDIC's interactive SOD survey web site. The site enables the institution to print worksheets, submit revised branch structure information, and edit SOD data prior to the survey submission.

4. Efforts to Identify Duplication

There is no other information system that collects deposit data at the individual bank office level. The Consolidated Reports of Condition and Income (Call Report) (OMB No. 3064-0052) collects deposit data at the bank system level (head office and branches combined). Deposit data for banks without branch offices are not collected through the SOD survey and are obtained directly from the Call Report.

5. Minimize the Burden on Small Institutions

Approximately 2,000 institutions that have no branches (unit banks) do not have to report. The collected information has to be in the same form from all respondents in order to achieve consistency in market structure measurements. However, small banks generally have fewer branches than the larger banks, and consequently the number of pages submitted by small banks tends to be much smaller than the number of pages filed by larger institutions.

6. Consequences of Less Frequent Collection

This question was previously considered by the FDIC, and we sought the opinions of the other users of SOD data (the Office of Comptroller of the Currency, the Federal Reserve Board, and the Department of Justice). Their responses were unanimous in urging that we maintain the survey on an annual basis to ensure the timeliness of the data used in the analyses that are performed on it. Immediately prior to 1972, SOD data were collected on a biennial basis. Annual reporting was adopted beginning with the June 30, 1972 survey after it was determined that biennial data was

inadequate because it was over 30 months old before data from the next survey was available. Even with the annual collection of SOD data, by the end of the period before new data is available, we are working with data that is 15 to 16 months old because of the time needed to process and edit the data for public release. With the current high rate of consolidation in the banking system, often involving mergers of banks with many branches, and the rapid rate of change in the financial industry, the need for current data is greater than ever. Also, the data is the only source of branch deposit information available and serves for structure verification for branches of banks. After considering the factors of reporting burden, processing cost, and program need, it has been determined that the most favorable frequency for the survey is annually.

7. Special Circumstances

None.

8. Summary of Public Comments; Consultation with Persons Outside the FDIC

A “first” Federal Register notice seeking comment was published on February 8, 2011 (76 FR 24486). One comment was received. The ABA comment agreed with phasing out BOS’ and replacing them with SODs, but encouraged FDIC to be flexible with respect to the July 31<sup>st</sup> deadline. In response, FDIC stated in the 30-day notice, attached to the ICR, that it would grant an additional 15 days for filing, until August 15, 2011.

9. Payment or Gift to Respondents

Not applicable.

10. Confidentiality

None; all of the collected data are available to the public on request.

11. Information of a Sensitive Nature

None.

12. Estimates of Annualized Burden

The annual burden will increase from an estimated 18,000 hours to 19,605 hours, due to the increase from approximately 6000 institutions to 6535 institutions, which spend an average of three hours to prepare the SOD. It is estimated that some institutions with only two or three branches will take 15 minutes to complete the survey while larger banks usually already have the branch information in their system for easy retrieval to complete the SOD form. (6,535 x 3 = 19,605).

13. Total Annual Cost Burden

None.

14. Annual Cost to the Federal Government

None.

15. Reason for Program Changes or Adjustments

The changes were mandated in the Dodd-Frank legislation.

16. Publication

All SOD data are available to the public on the FDIC's web site. Information which is normally published from this survey includes amounts of deposits (on an individual banking office basis) for MSAs, CMSAs, counties, states, and total in the United States. The data includes thrift deposit data collected by the Office of Thrift Supervision

17. Display of Expiration Date

The new expiration date will be shown.