Supporting Statement for the
Recordkeeping and Disclosure Requirements Associated with
Credit Risk Retention (Regulation RR) (Reg RR; OMB No. to be obtained)

Credit Risk Retention
(Docket No. R-1411) (RIN 7100-AD70)

Summary

The Board of Governors of the Federal Reserve System (Board), under delegated authority from the Office of Management and Budget (OMB), proposes to implement, the mandatory Recordkeeping and Disclosure Requirements Associated with Credit Risk Retention (Regulation RR) (Reg RR; OMB No. to be obtained). The Office of the Comptroller of the Currency (OCC), Federal Deposit Insurance Corporation (FDIC), and U.S. Securities and Exchange Commission (SEC) are separately submitting the requirements to OMB for approval under section 3507(d) of the Paperwork Reduction Act (PRA) and section 1320.11 of OMB's implementing regulations (5 C.F.R. part 1320). The PRA classifies reporting, recordkeeping, or disclosure requirements of a regulation as an "information collection."[1]

The Board, OCC, FDIC, SEC, the Federal Housing Finance Agency (FHFA), and the Department of Housing and Urban Development (HUD) (collectively, the agencies) have adopted a joint final rule that would implement the credit risk retention requirements of section 15G of the Securities Exchange Act of 1934, as added by section 941 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). Section 15G generally requires the securitizer of asset-backed securities to retain not less than 5 percent of the credit risk of the assets collateralizing the asset-backed securities. Section 15G includes a variety of exemptions from these requirements, including an exemption for asset-backed securities that are collateralized exclusively by residential mortgages that qualify as "qualified residential mortgages," as such term is defined by the agencies by rule. On September 20, 2013, the agencies published a joint notice of proposed rulemaking in the *Federal Register* for public comment (78 FR 57928). On December 24, 2014, the agencies published a joint notice of final rulemaking in the *Federal Register* (79 FR 77602). The final rule is effective on February 23, 2015. Compliance with the rule with respect to asset-backed securities collateralized by residential mortgages is required beginning December 24, 2015. Compliance with the rule with regard to all other classes of asset-backed securities is required beginning December 24, 2016.

The information collection pursuant to Regulation RR is triggered by specific events. There are no required reporting forms associated with Regulation RR. The Board accounts for the paperwork burden associated with Regulation RR for insured state member banks, bank holding companies, savings and loan holding companies, Edge and agreement corporations, foreign banking organizations, nonbank financial companies supervised by the Board, and any subsidiary thereof. The annual burden for the 102 annual offerings per year and 22 sponsors is estimated to be 2,114 hours.

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[1] See 44 U.S.C. § 3501 et seq.

Background and Justification

The agencies are adopting a final rule to implement the requirements of section 941 of the Dodd-Frank Act. Section 15G of the Exchange Act, as added by section 941(b) of the Dodd-Frank Act, generally requires the Board, OCC, FDIC (collectively, the Federal banking agencies), SEC, and, in the case of the securitization of any "residential mortgage asset," together with FHFA and HUD, to jointly prescribe regulations that (1) require a securitizer to retain not less than 5 percent of the credit risk of any asset that the securitizer, through the issuance of an asset-backed security (ABS), transfers, sells, or conveys to a third party, and (2) prohibit a securitizer from directly or indirectly hedging or otherwise transferring the credit risk that the securitizer is required to retain under section 15G and the agencies' implementing rules.

Section 15G of the Exchange Act exempts certain types of securitization transactions from these risk retention requirements and authorizes the agencies to exempt or establish a lower risk retention requirement for other types of securitization transactions. For example, section 15G specifically provides that a securitizer shall not be required to retain any part of the credit risk for an asset that is transferred, sold, or conveyed through the issuance of ABS interests by the securitizer, if all of the assets that collateralize the ABS interests are "qualified residential mortgages" (QRMs), as that term is jointly defined by the agencies, which definition can be "no broader than" the definition of a "qualified mortgage" (QM) as that term is defined under section 129C of the Truth in Lending Act (TILA), as amended by the Dodd-Frank Act, and regulations adopted thereunder. In addition, section 15G provides that a securitizer may retain less than 5 percent of the credit risk of commercial mortgages, commercial loans, and automobile loans that are transferred, sold, or conveyed through the issuance of ABS interests by the securitizer if the loans meet underwriting standards established by the Federal banking agencies.

Section 15G allocates the authority for writing rules to implement its provisions among the agencies in various ways. As a general matter, the agencies collectively are responsible for adopting joint rules to implement the risk retention requirements of section 15G for securitizations that are collateralized by residential mortgage assets and for defining what constitutes a QRM for purposes of the exemption for QRM-backed ABS interests. The Federal banking agencies and the SEC, however, are responsible for adopting joint rules that implement section 15G for securitizations collateralized by all other types of assets, and are authorized to adopt rules in several specific areas under section 15G. In addition, the Federal banking agencies are jointly responsible for establishing, by rule, underwriting standards for non-QRM residential mortgages, commercial mortgages, commercial loans, and automobile loans (or any other asset class established by the Federal banking agencies and the SEC) that would qualify sponsors of ABS interests collateralized by these types of loans for a risk retention requirement of less than 5 percent.

In April 2011, the agencies published a joint notice of proposed rulemaking that proposed to implement section 15G of the Exchange Act (the original proposal). The agencies invited and received comment from the public on the original proposed rule. In September 2013, the agencies published a second joint notice of proposed rulemaking (the revised proposal) that proposed significant modifications to the original proposal and that again invited comment from the public. The agencies are adopting the revised proposal with some changes in response to

comments received.

Description of Information Collection

The final rule sets forth permissible forms of risk retention for securitizations that involve issuance of asset-backed securities, as well as exemptions from the risk retention requirements. The information requirements in joint final rule are found in sections 244.4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16, 17, 18, and 19(g). The agencies believe that the recordkeeping and disclosure requirements associated with the various forms of risk retention will enhance market discipline, help ensure the quality of the assets underlying a securitization transaction, and assist investors in evaluating transactions. Compliance with the information collections would be mandatory. No other federal law mandates these recordkeeping and disclosures requirements.

Standard Risk Retention. Section 244.4 sets forth the conditions that must be met by sponsors electing to use the standard risk retention option, which may consist of an eligible vertical interest or an eligible horizontal residual interest, or any combination thereof. Sections 244.4(c)(1) and 244.4(c)(2) specify the disclosures required with respect to eligible horizontal residual interests and eligible vertical interests, respectively.

A sponsor retaining any eligible horizontal residual interest (or funding a horizontal cash reserve account) is required to disclose: The fair value (or a range of fair values and the method used to determine such range) of the eligible horizontal residual interest that the sponsor expects to retain at the closing of the securitization transaction (244.4(c)(1)(i)(A)); the material terms of the eligible horizontal residual interest (244.4(c)(1)(i)(B)); the methodology used to calculate the fair value (or range of fair values) of all classes of ABS interests (244.4(c)(1)(i)(C)); the key inputs and assumptions used in measuring the estimated total fair value (or range of fair values) of all classes of ABS interests (244.4(c)(1)(i)(D)); the reference data set or other historical information used to develop the key inputs and assumptions (244.4(c)(1)(i)(G)); the fair value of the eligible horizontal residual interest retained by the sponsor (244.4(c)(1)(ii)(A)); the fair value of the eligible horizontal residual interest required to be retained by the sponsor (244.4(c)(1)(ii)(B)); description of any material differences between the methodology used in calculating the fair value disclosed prior to sale and the methodology used to calculate the fair value at the time of closing (244.4(c)(1)(ii)(C)); and the amount placed by the sponsor in the horizontal cash reserve account at closing, the fair value of the eligible horizontal residual interest that the sponsor is required to fund through such account, and a description of such account (244.4(c)(1)(iii)).

For eligible vertical interests, the sponsor is required to disclose: The form of the eligible vertical interest (244.4(c)(2)(i)(A)); the percentage that the sponsor is required to retain (244.4(c)(2)(i)(B)); a description of the material terms of the vertical interest and the amount the sponsor expects to retain at closing (244.4(c)(2)(i)(C)); and the amount of vertical interest retained by the sponsor at closing (244.4(c)(2)(ii)).

Section 244.4(d) requires a sponsor to retain the certifications and disclosures required in paragraphs (a) and (c) of this section in its records and must provide the disclosure upon request to the SEC and the sponsor's appropriate Federal banking agency, if any, until three years after

no ABS interests are outstanding.

Revolving Pool Securitizations. Section 244.5 requires sponsors relying on the master trust (or revolving pool securitization) risk retention option to disclose: The material terms of the seller's interest and the percentage of the seller's interest that the sponsor expects to retain at the closing of the transaction (244.5(k)(1)(i)); the percentage of the seller's interest that the sponsor retained at closing (244.5(k)(1)(ii)); the material terms of any horizontal risk retention offsetting the seller's interest under 244.5(g), 244.5(h), and 244.5(i) (244.5(k)(1)(iii)); and the fair value of any horizontal risk retention retained by the sponsor (244.5(k)(1)(iv)). Additionally, a sponsor must retain the disclosures required in 244.5(k)(1) in its records and must provide the disclosure upon request to the SEC and the sponsor's appropriate Federal banking agency, if any, until three years after no ABS interests are outstanding (244.5(k)(3)).

Eligible ABCP Conduits. Section 244.6 addresses the requirements for sponsors utilizing the eligible asset-backed commercial paper (ABCP) conduit risk retention option. The requirements for the eligible ABCP conduit risk retention option include disclosure to each purchaser of ABCP and periodically to each holder of commercial paper issued by the ABCP conduit of the name and form of organization of the regulated liquidity provider that provides liquidity coverage to the eligible ABCP conduit, including a description of the material terms of such liquidity coverage, and notice of any failure to fund; and with respect to each ABS interest held by the ABCP conduit, the asset class or brief description of the underlying securitized assets, the standard industrial category code for each originator-seller that retains an interest in the securitization transaction, and a description of the percentage amount and form of interest retained by each originator-seller (244.6(d)(1)). An ABCP conduit sponsor relying upon this section shall provide, upon request, to the SEC and the sponsor's appropriate Federal banking agency, if any, the information required under 244.6(d)(1), in addition to the name and form of organization of each originator-seller that retains an interest in the securitization transaction (244.6(d)(2)).

A sponsor relying on the eligible ABCP conduit risk retention option shall maintain and adhere to policies and procedures to monitor compliance by each originator-seller (244.6(f)(2)(i)). If the ABCP conduit sponsor determines that an originator-seller is no longer in compliance, the sponsor must promptly notify the holders of the ABCP, and upon request, the SEC and the sponsor's appropriate Federal banking agency, in writing of the name and form of organization of any originator-seller that fails to retain, and the amount of ABS interests issued by an intermediate special purpose vehicle (SPV) of such originator-seller and held by the ABCP conduit (244.6(f)(2)(ii)(A)(1)); the name and form of organization of any originator-seller that hedges, directly or indirectly through an intermediate SPV, its risk retention in violation of the rule, and the amount of ABS interests issued by an intermediate SPV of such originator-seller and held by the ABCP conduit (244.6(f)(2)(ii)(A)(2)); and any remedial actions taken by the ABCP conduit sponsor or other party with respect to such ABS interests (244.6(f)(2)(ii)(A)(3)).

Commercial Mortgage-Backed Securities. Section 244.7 sets forth the requirements for sponsors relying on the commercial mortgage-backed securities risk retention option, and includes disclosures of: The name and form of organization of each initial third-party purchaser (244.7(b)(7)(i)); each initial third-party purchaser's experience in investing in commercial

mortgage-backed securities (244.7(b)(7)(ii)); other material information (244.7(b)(7)(iii)); the fair value and purchase price of the eligible horizontal residual interest retained by each third-party purchaser, and the fair value of the eligible horizontal residual interest that the sponsor would have retained if the sponsor had relied on retaining an eligible horizontal residual interest under the standard risk retention option (244.7(b)(7)(iv) and (v)); a description of the material terms of the eligible horizontal residual interest retained by each initial third-party purchaser, including the same information as is required to be disclosed by sponsors retaining horizontal interests pursuant to 244.4 (244.7(b)(7)(vi)); the material terms of the applicable transaction documents with respect to the Operating Advisor (244.7(b)(7)(vii)); and representations and warranties concerning the securitized assets, a schedule of any securitized assets that are determined not to comply with such representations and warranties, and the factors used to determine that such securitized assets should be included in the pool notwithstanding that they did not comply with the representations and warranties (244.7(b)(7)(viii)). A sponsor relying on the commercial mortgage-backed securities risk retention option is also required to provide in the underlying securitization transaction documents certain provisions related to the Operating Advisor (244.7(b)(6)), to maintain and adhere to policies and procedures to monitor compliance by third-party purchasers with regulatory requirements (244.7(c)(2)(A)), and to notify the holders of the ABS interests in the event of noncompliance by a third-party purchaser with such regulatory requirements (244.7(c)(2)(B)).

Federal National Mortgage Association and Federal Home Loan Mortgage Corportation ABS. Section 244.8 requires that a sponsor relying on the Federal National Mortgage Association and Federal Home Loan Mortgage Corporation risk retention option must disclose a description of the manner in which it has met the credit risk retention requirements (244.8(c)).

Open Market CLOs. Section 244.9 sets forth the requirements for sponsors relying on the open market collateralized loan obligations (CLO) risk retention option, and includes disclosures of a complete list of, and certain information related to, every asset held by an open market CLO (244.9(d)(1)), and the full legal name and form of organization of the CLO manager (244.9(d)(2)).

Qualified Tender Option Bonds. Section 244.10 sets forth the requirements for sponsors relying on the qualified tender option bond risk retention option, and includes disclosures of the name and form of organization of the qualified tender option bond entity, a description of the form and subordination features of the retained interest in accordance with the disclosure obligations in section 244.4(d), the fair value of any portion of the retained interest that is claimed by the sponsor as an eligible horizontal residual interest, and the percentage of ABS interests issued that is represented by any portion of the retained interest that is claimed by the sponsor as an eligible vertical interest (244.10(e)(1)-(4)). In addition, to the extent any portion of the retained interest claimed by the sponsor is a municipal security held outside of the qualified tender option bond entity, the sponsor must disclose the name and form of organization of the qualified tender option bond entity, the identity of the issuer of the municipal securities, the face value of the municipal securities deposited into the qualified tender option bond entity, and the face value of the municipal securities retained outside of the qualified tender option bond entity by the sponsor or its majority-owned affiliates (244.10(e)(5)).

Allocation of Risk Retention to an Originator. Section 244.11 sets forth the conditions that apply when the sponsor of a securitization allocates to originators of securitized assets a portion of the credit risk the sponsor is required to retain, including disclosure of the name and form of organization of any originator that acquires and retains an interest in the transaction, a description of the form, amount and nature of such interest, and the method of payment for such interest (244.11(a)(2)). A sponsor relying on this section is required to maintain and adhere to policies and procedures that are reasonably designed to monitor originator compliance with retention amount and hedging, transferring and pledging requirements (244.11(b)(2)(A)), and to promptly notify the holders of the ABS interests in the transaction in the event of originator non-compliance with such regulatory requirements (244.11(b)(2)(B)).

Exemption for Qualified Residential Mortgages and Exemptions for Securitizations of Certain Three-to-Four Unit Mortgage Loans. Sections 244.13 and 244.19(g) provide exemptions from the risk retention requirements for qualified residential mortgages and qualifying 3-to-4 unit residential mortgage loans that meet certain specified criteria, including that the depositor with respect to the securitization transaction certify that it has evaluated the effectiveness of its internal supervisory controls and concluded that the controls are effective (244.13(b)(4)(i) and 244.19(g)(2)), and that the sponsor provide a copy of the certification to potential investors prior to sale of asset-backed securities in the issuing entity (244.13(b)(4)(iii) and 244.19(g)(2)). In addition, 244.13(c)(3) and 244.19(g)(3) provide that a sponsor that has relied upon the exemptions will not lose the exemptions if, after closing of the transaction, it is determined that one or more of the residential mortgage loans does not meet all of the criteria; provided that the depositor complies with certain specified requirements, including prompt notice to the holders of the asset-backed securities of any loan that is required to be repurchased by the sponsor, the amount of such repurchased loan, and the cause for such repurchase.

Qualifying Commercial Loans, Commercial Real Estate Loans, and Automobile Loans. Section 244.15 provides exemptions from the risk retention requirements for qualifying commercial loans that meet the criteria specified in Section 244.16, qualifying commercial real estate (CRE) loans that meet the criteria specified in Section 244.17, and qualifying automobile loans that meet the criteria specified in Section 244.18. Section 244.15 also requires the sponsor to disclose a description of the manner in which the sponsor determined the aggregate risk retention requirement for the securitization transaction after including qualifying commercial loans, qualifying CRE loans, or qualifying automobile loans with 0 percent risk retention (244.15(a)(4)). In addition, the sponsor is required to disclose descriptions of the qualifying commercial loans, qualifying CRE loans, and qualifying automobile loans (qualifying assets), and descriptions of the assets that are not qualifying assets, and the material differences between the group of qualifying assets and the group of assets that are not qualifying assets with respect to the composition of each group's loan balances, loan terms, interest rates, borrower credit information, and characteristics of any loan collateral (244.15(b)(3)). Additionally, a sponsor must retain the disclosures required in 244.15(a) and (b) in its records and must provide the disclosure upon request to the SEC and the sponsor's appropriate Federal banking agency, if any, until three years after no ABS interests are outstanding (244.15(d)).

Underwriting Standards for Qualifying Commercial Loans, Underwriting Standards for Qualifying CRE Loans, and Underwriting Standards for Qualifying Automobile Loans. Sections 244.16, 244.17, and 244.18 each require that: The depositor of the asset-backed security certify that it has evaluated the effectiveness of its internal supervisory controls and concluded that its internal supervisory controls are effective (244.16(a)(8)(i), 244.17(a)(10)(i), and 244.18(a)(8)(i)); the sponsor is required to provide a copy of the certification to potential investors prior to the sale of asset-backed securities in the issuing entity (244.16(a)(8)(iii), 244.17(a)(10)(iii), and 244.18(a)(8)(iii)); and the sponsor must promptly notify the holders of the asset-backed securities of any loan included in the transaction that is required to be cured or repurchased by the sponsor, including the principal amount of such loan and the cause for such cure or repurchase (244.16(b)(3), 244.17(b)(3), and 244.18(b)(3)). Additionally, a sponsor must retain the disclosures required in 244.16(a)(8), 244.17(a)(10) and 244.18(a)(8) in its records and must provide the disclosure upon request to the SEC and the sponsor's appropriate Federal banking agency, if any, until three years after no ABS interests are outstanding (244.15(d)).

Time Schedule for Information Collection

Information collection pursuant to these recordkeeping and disclosure requirements is event-generated and must be provided to the investor within the time periods established by the law and regulation as discussed above.

Legal Status

The Board's Legal Division has determined that section 15G of the Securities Exchange Act, which was added by 941(b) of the Dodd-Frank Act, authorizes the agencies to jointly prescribe the risk retention requirements (15 U.S.C. § 78o-11). Compliance with the information collection is mandatory. Since the Board does not collect any information, no issue of confidentiality should arise. If the Board's examiners retain a copy of the records as part of the examination or supervision of a financial institution, the records may be exempt from disclosure under exemption (b)(8) of the Freedom of Information Act, which exempts from disclosure matters that are "contained in or related to examination, operating, or condition reports prepared by, or on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions" (5 U.S.C. §552(b)(8)).

Consultation Outside of the Agency

On April 29, 2011, the agencies published a joint notice of proposed rulemaking (the original proposal) in the *Federal Register* (76 FR 24090) for public comment. The comment period was extended until August 1, 2011, to allow interested parties more time to analyze the issues and prepare their comments. On September 20, 2013, the agencies published a joint notice of proposed rulemaking (the revised proposal) in the *Federal Register* (78 FR 57928) for public comment. The comment period for this notice expired on October 30, 2013. While commenters provided qualitative comments on the possible costs of the rule, the agencies did not receive any quantitative comments on the PRA analysis. On December 24, 2014, the agencies published a joint notice of final rulemaking in the *Federal Register* (79 FR 77602). The final

rule is effective on February 23, 2015. Compliance with the rule with respect to asset-backed securities collateralized by residential mortgages is required beginning December 24, 2015. Compliance with the rule with regard to all other classes of asset-backed securities is required beginning December 24, 2016.

Estimate of Respondent Burden

The estimated total annual burden for the recordkeeping and disclosure requirements of this information collection is 2,114 hours, as shown in the table below. The table provides the estimated annual burden for the 102 annual offerings per year and 22 sponsors to which Regulation RR applies.

To determine the total paperwork burden for the recordkeeping and disclosure requirements contained in this rule, the agencies first estimated the universe of sponsors that would be required to comply with the disclosure and recordkeeping requirements. The agencies estimate that approximately 270 unique sponsors conduct ABS offerings each year. This estimate was based on the average number of ABS offerings from 2004 through 2013 reported by the ABS database Asset-Backed Alert for all non-CMBS transactions and by Commercial Mortgage Alert for all CMBS transactions. Of the 270 sponsors, the agencies have assigned 8 percent of these sponsors to the Board, 12 percent to the FDIC, 13 percent to the OCC, and 67 percent to the SEC.[2]

Next, the agencies estimated the burden per response that is associated with each recordkeeping and disclosure requirement, and then estimated how frequently the entities would make the required disclosure by estimating the proportionate amount of offerings per year for each agency. In making this determination, the estimate was based on the average number of ABS offerings from 2004 through 2013 and, therefore, the agencies estimate the total number of annual offerings per year to be 1,275. The agencies also made the following additional estimates:

- 12 offerings per year would be subject to recordkeeping and disclosure requirements under section __.11, which are divided equally among the four agencies (i.e., 3 offering per year per agency);
- 100 offerings per year would be subject to recordkeeping and disclosure requirements under sections __.13 and __.19, which are divided proportionately among the agencies based on the entity percentages described above (i.e., 8 offerings per year subject to sections __.13 and __.19 for the Board; 12 offerings per year for the FDIC; 13 offerings per year for the OCC; and 67 offerings per year for the SEC); and
- 120 offerings per year will be subject to recordkeeping and disclosure requirements under section __.15, which are divided proportionately among the agencies based on the entity percentages described above (i.e., 10 offerings per year subject to section __.15 for the Board, 14 offerings per year for the FDIC; 16 offerings per year for the OCC, and 80 offerings per year subject for the SEC). Of these 120 offerings per year, 40 offerings per

[2] The allocation percentages among the agencies have been adjusted based on the agencies' latest assessment of more recent data, including the securitization activity reported by FDIC-insured depository institutions in the June 30, 2014, Consolidated Reports of Condition.

year will be subject to recordkeeping and disclosure requirements under sections __.16, __.17, and __.18, respectively, which are divided proportionately among the agencies based on the entity percentages described above (i.e., 3 offerings per year subject to each section for the Board, 5 offerings per year subject to each section for the FDIC; 5 offerings per year subject to each section for the OCC, and 27 offerings per year subject to each section for the SEC).

To obtain the estimated number of responses (equal to the number of offerings) for each option in subpart B of the rule, the agencies multiplied the number of offerings estimated to be subject to the base risk retention requirements (i.e., 1,055) by the sponsor percentages described above. The result was the number of base risk retention offerings per year per agency. For the Board, this was calculated by multiplying 1,055 offerings per year by 8 percent, which equals 84 offerings per year. This number was then divided by the number of base risk retention options under subpart B of the rule (i.e., 9) to arrive at the estimate of the number of offerings per year per agency per base risk retention option. For the Board, this was calculated by dividing 84 offerings per year by 9 options, resulting in 9 offerings per year per base risk retention option. The Reg RR recordkeeping and disclosure requirements represent less than 1 percent of total Federal Reserve System paperwork burden.

Reg RR	*Estimated number of offerings*[3]	*Annual frequency*	*Estimated average hours per response*	*Estimated annual burden hours*
Section 244.4				
Standard Risk Retention				
Horizontal Interest				
Recordkeeping	9	1	0.5	5
Disclosures	9	1	5.5	50
Vertical Interest				
Recordkeeping	9	1	0.5	5
Disclosures	9	1	2.0	18
Combined Horizontal and				
Vertical Interests				
Recordkeeping	9	1	0.5	5
Disclosures	9	1	7.5	68
Section 244.5				
Revolving Pool Securitizations				
Recordkeeping	9	1	0.5	5
Disclosures	9	1	7.0	63
Section 244.6				
Eligible ABCP Conduits				
Recordkeeping	9	1	20.0	180
Disclosures	9	1	3.0	27
Section 244.7				
Commercial Mortgage-Backed				
Securities				
Recordkeeping	9	1	30.0	270
Disclosures	9	1	20.75	187
Section 244.8				
FNMA and FHLMC ABS				
Disclosures	9	1	1.5	14
Section 244.9				
Open Market CLOs				
Disclosures	9	1	20.25	182
Section 244.10				
Qualified Tender Option Bonds				
Disclosures	9	1	6.0	54

[3] Of these respondents, none are considered a small entity as defined by the Small Business Administration (i.e., entities with less than $550 million in total assets) www.sba.gov/contracting/getting-started-contractor/make-sure-you-meet-sba-size-standards/table-small-business-size-standards.

Section 244.11 Allocation of Risk Retention to an Originator				
Recordkeeping	3	1	20.0	60
Disclosures	3	1	2.5	8
Sections 244.13 and 244.19(g) Exemption for Qualified Residential Mortgages and Exemptions for Securitizations of Certain Three-to-Four Unit Mortgage Loans				
Recordkeeping	8	1	40.0	320
Disclosures	8	1	1.25	10
Section 244.15 Qualifying Commercial Loans, Commercial Real Estate Loans, and Automobile Loans				
Recordkeeping	10	1	0.5	5
Disclosures	10	1	20.0	200
Section 244.16 Underwriting Standards for Qualifying Commercial Loans				
Recordkeeping	3	1	40.5	122
Disclosures	3	1	1.25	4
Section 244.17 Underwriting Standards for Qualifying CRE Loans				
Recordkeeping	3	1	40.5	122
Disclosures	3	1	1.25	4
Section 244.18 Underwriting Standards for Qualifying Automobile Loans				
Recordkeeping	3	1	40.5	122
Disclosures	3	1	1.25	4
Total				2,114

The total annual cost to the public for this information collection is estimated to be $112,359.[4]

[4] Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at $17, 45% Financial Managers at $65, 15% Lawyers at $66, and 10% Chief Executives at $89). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), *Occupational Employment and Wages May 2015*, published March 30, 2016 www.bls.gov/news.release/ocwage.t01.htm. Occupations are defined using the BLS Occupational Classification System, www.bls.gov/soc/.

Sensitive Questions

This information collection contains no questions of a sensitive nature, as defined by OMB guidelines.

Estimate of Cost to the Federal Reserve System

Since the Regulation RR does not require the Board to collect any information, the cost to the Federal Reserve System is negligible.