

**SUPPORTING STATEMENT
ELECTRONIC OPERATIONS
OMB CONTROL NO. 1550-0095**

A. JUSTIFICATION

1. Circumstances and Need

With the increased focus of institutions on the use of electronic channels to perform their daily operations and offer new products and services, the Office of Thrift Supervision (“OTS”) plays an important role in evaluating an institution’s risks in the use of information technology.

Federal savings associations may use, or participate with others to use, electronic means or facilities to perform any function, or provide any product or service, as part of an authorized activity. 12 C.F.R. § 555. Electronic means or facilities include, but are not limited to, automated teller machines, automated loan machines, personal computers, the Internet, the World Wide Web, telephones, and other similar electronic devices. The regulation also requires each savings association to notify OTS at least 30 days before establishing a transactional web site. Savings associations that present supervisory or compliance concerns may be subject to additional procedural requirements.

2. Use of Information Collected

This information collection facilitates OTS’s ability to identify industry technology trends and better understand emerging technologies. The information is collected transactionally, and is used to ensure that safety and soundness requirements are being met.

3. Use of Technology to Reduce Burden

The data collected in this survey is tabulated using information technology. The collection of this data is not suitable for the use of technology. Since automated information systems may be used in a very limited capacity to obtain or process the information required by the proposed information collection, and because these systems vary from institution to institution, the use of improved technology to reduce the burden is not applicable.

4. Efforts to Identify Duplication

This information collection is not duplicative within the meaning of the PRA and OMB regulations. Information that is similar to or that corresponds to information that could serve OTS’s purpose and need in this information collection is not being collected by any other means or for any other purpose; nor is this information otherwise available in the detail necessary to satisfy the purpose and need for which this collection of information is undertaken.

5. Minimizing the Burden on Small Firms

The time required to complete the notice is not affected by the size or complexity of the institution.

6. Consequences of Less Frequent Collection

Absent the collection of information, safety and soundness standards may not be met. This could result in risk to the insurance fund.

7. Special Circumstances

This information collection is conducted in a manner that is consistent with the guidelines set forth in 5 C.F.R. §1320.6.

8. Consultation with persons Outside OTS

Notice of the intent to renew this information collection was published in the Federal Register on July 30, 2008, Vol. 73, FR 147. OTS has not received any comments.

9. Payment of Respondents

No payments or gifts are made in connection with this information collection.

10. Confidentiality

OTS releases all of the information collected, except materials the disclosure of which would result in an invasion of personal privacy, impair the financial stability of the reporting entities, or otherwise adversely affect any public or private interest, in conformity with Department of Treasury regulations and the mandate of 5 U.S.C. § 552.

11. Information of a Sensitive Nature

No questions of a sensitive nature are required by this information collection.

12. Annual Hour Burden Estimate

The estimated number of respondents is 80; number of hours per response = 2. The total annual hour burden for this requirement is 160 hours. At an average cost per hour of \$55.00, the average annual cost per respondent for this requirement is \$110.00.

13. Total Annual Cost Estimate

Electronic operations in and of themselves have start-up costs. However, the decision to engage in these activities triggers the requirement for submission of the notice to OTS. The reporting requirement does not trigger the start-up costs.

14. Annualized Cost to Government

There are no costs to the Federal government involved in this information collection.

15. Reason for Change in Burden

OTS is not citing a change in the burden.

16. Publication

Not applicable.

17. Expiration Date

No specific form is required by this information collection. The OMB Control Number is displayed in the regulation table at 12 C.F.R. § 506.1. OTS requests permission not to display the expiration date.

18. Exceptions

There are no exceptions to the certification on OMB Form 83-I.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.