SUPPORTING STATEMENT

Consolidated Reports of Condition and Income
(FDIC-Supervised Depository Institutions)

FFIEC 031 and 041
(OMB No. 3064-0052)

INTRODUCTION

The FDIC is submitting for Office of Management and Budget (OMB) review a change to the reporting panel for the Federal Financial Institutions Examination Council (FFIEC) Consolidated Reports of Condition and Income (Call Report). At present, insured state nonmember banks (i.e., insured state-chartered commercial and savings banks that are not members of the Federal Reserve Board System) file Call Reports quarterly with the FDIC. Subject to OMB approval, insured state-chartered savings associations would begin to file the Call Report quarterly with the FDIC effective as of the March 31, 2012, report date. Until that report date, savings associations would continue to file the Thrift Financial Report, which is an approved information collection for the Office of Thrift Supervision (OTS) (OMB No. 1550-0023). However, savings associations would be permitted to convert early to the Call Report as of either the September 30 or December 31, 2011, report dates, but would still need to submit TFR Schedule HC – Thrift Holding Company, along with all other existing OTS regulatory reports through the December 31, 2011, report date.

The proposed revision to the FDIC's reporting panel for the Call Report results from Title III of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act), which was enacted into law on July 21, 2010. Title III of the Dodd-Frank Act abolishes the OTS, provides for its integration with the Office of the Comptroller of the Currency (OCC) effective as of July 21, 2011 (the "transfer date"), and transfers the OTS's functions to the OCC, the Federal Reserve Board (FRB), and the FDIC. All functions of the OTS relating to federal savings associations and rulemaking authority for all savings associations are transferred to the OCC. All functions of the OTS relating to state-chartered savings associations (other than rulemaking) are transferred to the FDIC. All functions of the OTS relating to supervision of savings and loan holding companies (including rulemaking) are transferred to the FRB.

After careful review, the federal banking agencies believe that having common financial reports and reporting processes among all FDIC-insured banks and savings institutions would be more efficient and would lead to more uniform comparisons of financial condition, performance, and trends among regulated institutions. For these reasons, the OTS is proposing to eliminate the TFR after the filing of the TFRs for December 31, 2011, and the agencies are proposing to require savings associations to begin to complete the Call Report required of all other FDIC-insured banks and savings institutions beginning March 31, 2012.

JUSTIFICATION

1. Circumstances and Need

Section 7 of the Federal Deposit Insurance Act requires all insured depository institutions to file four "reports of condition" each year with their primary federal bank regulatory agency, either the FDIC, the OCC, the FRB, or the OTS. Insured state nonmember banks currently submit the Consolidated Reports of Condition and Income (Call Report) to the FDIC. National banks currently submit the Call Report to the OCC. State member banks currently submit the Call Report to the FRB. Savings associations currently submit their "reports of condition," the TFR, to the OTS. The FDIC uses the quarterly "reports of condition" to monitor the condition and performance of individual banks and the industry as a whole. In addition, "reports of condition" provide the FDIC with the most current statistical data available for evaluating bank corporate applications such as mergers; identifying areas of focus for both on-site and off-site examinations; calculating all insured institutions' deposit insurance and Financing Corporation assessments; and other public purposes.

Within the Call Report information collection system, separate sets of forms apply to banks that have domestic and foreign offices (FFIEC 031) and to banks with domestic offices only (FFIEC 041).

The amount of data required to be reported varies between the two versions of the report forms, with the report forms for banks with domestic and foreign offices (FFIEC 031) having more data items than the report forms for banks with domestic offices only (FFIEC 041). Furthermore, the amount of data required to be reported varies within the FFIEC 041 report form, primarily based on the size of the bank, but also in some cases based on activity levels. In general, the FFIEC 041 report form requires the least amount of data from banks with less than $100 million in total assets.

The reasons for the change in the FDIC's reporting panel for the Call Report, which is the subject of this submission, are described in the Introduction above and in the agencies' initial and final Paperwork Reduction Act Federal Register notices, which are attached.

2. Use of Information Collected

The information collected in the "reports of condition" (Call Reports and TFRs) is used by the FDIC and the other federal bank regulatory agencies both on an individual institution basis and in aggregate form for supervisory, surveillance, regulatory, research, statistical, insurance assessment, and informational purposes. Call Report and TFR data for all institutions, not just the institutions under its primary supervision, are available to each of the banking agencies in order for each agency to have access to information for the depository institution system as a whole.

The FDIC uses the data collected in the Call Reports extensively for supervisory and surveillance purposes in an effort to detect at an early date those FDIC-supervised banks that are experiencing deterioration or some other significant change in their condition. The underlying basis for this activity at the FDIC, as well as at the other banking agencies, is the goal of maintaining a safe and sound banking system and reducing the possibility of the failure of individual institutions and the concomitant exposure of the Deposit Insurance Fund administered by the FDIC. The FDIC has two major surveillance programs (EWS and UBPR) for its use in performing off-site evaluation of the condition of individual institutions. In addition, various quarterly management and supervisory reports used for off-site monitoring capabilities are available in web-based systems like ViSION (Virtual Supervisory Information on the Net) and distributed systems like ARIS (Automated Regional Information System).

<u>Early Warning Systems (EWS)</u> – The EWS is the FDIC's umbrella of off-site surveillance models that are used to monitor the condition of insured institutions between regular bank examinations. Data collected from each institution's Call Report are subjected to a screening process in the EWS known as SCOR (Statistical CAMELS Off-site Rating). SCOR is an off-site model for insured institutions that compares an institution's financial condition against examination ratings for comparable institutions. SCOR derives a rating for each component of the Uniform Financial Institutions Rating System (UFIRS). The composite and component ratings are then compared to those given at the last examination and a downgrade probability is derived for each institution. Those institutions whose downgrade probability exceeds a specified level are subject to supervisory follow-up procedures including the prompt scheduling of examinations or visitations. The FDIC also has developed two off-site rating tools called GMS (Growth Monitoring System) and REST (Real Estate Stress Test) in order to effectively and efficiently monitor risk to the banking and thrift system. GMS identifies institutions that may pose greater risks due to rapid growth and/or funding issues. GMS places institutions into percentile rankings based on GMS scores. Those with the highest GMS scores are subject to formal off-site review requirements similar to SCOR. REST identifies institutions with high concentrations of commercial real estate and other exposures similar to the exposure characteristics of problem banks and institutions that failed during the New England crisis of the late 1980s and early 1990s.

Another part of the EWS includes the Uniform Bank Performance System (UBPS). The UBPS is an on-line support subsystem that calculates for each institutions filing a Call Report approximately 300 financial ratios and accompanying peer group and ranking data and presents this information in a manner consistent with the Uniform Bank Performance Report, which is discussed below. The UBPS covers the most recent and preceding 15 quarters.

<u>Uniform Bank Performance Report (UBPR)</u> – This report is prepared quarterly for each insured commercial and savings bank from Call Report data and presents information for five periods on a bank's performance and financial statement composition in the form of ratios, percentages, and dollar amounts. Each UBPR also includes corresponding average data for the bank's peer group and percentile rankings for most ratios. Once the reporting panel for the Call Report includes savings associations, a UBPR will begin to be prepared for each such institution. The comparative and trend data contained in the UBPR complement the EMS data and are utilized for further off-premises review of individual institutions, particularly at the field office level.

Based on an analysis of the information in the UBPR, an examiner can set the priorities for the examination of an institution. The condition of an institution can then be evaluated during the examination in light of its recent trends and the examiner's findings can be communicated to the institution's management. Management can verify this trend data in its own institution's UBPRs. UBPRs are available on-line on the Internet for access by institutions, regulators, and the public.

ViSION and ARIS – ViSION is a secure web-enabled system that was developed as a comprehensive and easy-to-use reporting source for the FDIC's supervisory and financial data. The system provides FDIC users with multiple reports that display information for a specific institution or set of institutions. ViSION provides users the ability to retrieve various supervisory and off-site reports. These various management reports are used to assist in off-site monitoring efforts and are reviewed at the regional or field office level on a regular basis. ARIS is a localized database and reporting system that includes many levels of drill-down management and supervisory reporting. ARIS reporting will eventually be phased into the ViSION system.

Through the use of monitoring and surveillance systems that rely on Call Report information, the FDIC is able to more effectively and efficiently allocate resources to those institutions experiencing difficulties. Also, FDIC policy requires examiners to use information from Call Reports as well as data available from monitoring and surveillance systems to assist in their pre-examination planning activities. Through pre-examination planning, examiners can determine the areas of an institution's operations and activities on which to focus their attention during their time on-site at the institution. Moreover, effective pre-examination planning can help to limit the amount of time examiners need to spend on-site during an examination. These efforts would not be feasible if Call Reports, with their present emphasis on the collection of data for supervisory and surveillance purposes, were not available on a quarterly basis.

Call Reports also provide the most current statistical data available for evaluating statutory factors relating to the FDIC's consideration of applications from institutions for deposit insurance and for consent to merge, establish a branch, relocate an office, and retire capital. The FDIC's deposit insurance and Financing Corporation assessments are calculated based on data reported in Call Reports. Moreover, the amount of each individual bank's assessments is calculated directly by the FDIC from the deposit information and related data reported on the institution's Call Report. In addition, under the FDIC's risk-related insurance assessment system, Call Report data are used to help determine the risk category to which each insured institution should be assigned. The FDIC's Division of Insurance and Research uses data collected in the Call Reports to prepare quarterly reports on the condition and performance of the banking system and for numerous economic studies and analyses of trends in banking that are incorporated into reports submitted to Congress and made available to the public.

3. Use of Technology to Reduce Burden

All institutions that file the Call Report are required to submit their data to the agencies electronically. In this regard, the agencies have created a secure shared database for collecting, managing, validating and distributing Call Report data. This database system, the Central Data

Repository (CDR), was implemented in 2005 and is the sole method available for institutions to submit their Call Report data. Under the CDR system, institutions file their Call Report data via the Internet using software that contains the FFIEC's edits for validating Call Report data before submission.

4. Efforts to Identify Duplication

There is no other report or series of reports that currently collects from all insured commercial and savings banks the information gathered through the Consolidated Reports of Condition and Income taken as a whole. There are other information collections for insured commercial and savings banks that tend to duplicate certain parts of the Call Report; however, the information they provide would be of limited value as a replacement for the Call Report. This will remain the case when savings associations convert from filing the TFR to filing the Call Report effective as of the March 31, 2012, report date.

For example, the FRB collects various reports in connection with its measurement of monetary aggregates, of bank credit, and of flow of funds. Reporting institutions supply the FRB with detailed information relating to such balance sheet accounts as balances due from depository institutions, loans, and deposit liabilities. The FRB also collects financial data from bank holding companies on a regular basis.[1] Such data are presented for the holding company on a consolidated basis, including its banking and nonbanking subsidiaries, and on a parent company only basis.

However, FRB reports from institutions are frequently obtained on a sample basis rather than from all insured institutions. Moreover, these reports are often prepared as of dates other than the last business day of each quarter, which would seriously limit their comparability to the Call Report. Institutions below a certain size are exempt entirely from some FRB reporting requirements. FRB data collected from bank holding companies on a consolidated basis reflect an aggregate amount for all subsidiaries within the organization, both banking and nonbanking, so that the actual dollar amounts applicable to any bank subsidiary are not determinable from the holding company reports. Hence, FRB reports could not be a viable replacement for even a significant portion of the Call Reports since the FDIC, in its role as supervisor of insured state nonmember banks (and, as of July 21, 2011, insured state-chartered savings associations), would be lacking the data necessary to assess the financial condition of individual insured institutions to determine whether there had been any deterioration in their condition.

As another example, banks with 500 or more shareholders are required by the Securities Exchange Act of 1934, as amended, to register their stock with their primary federal bank regulatory agency. Following the effective date of the stock registration, quarterly and annual reports, which contain financial statements, must be filed with the appropriate regulatory agency.

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[1] The FRB published a notice of its intent to require savings and loan holding companies (SLHCs) to submit to the FRB all regulatory reports that are currently required to be filed by bank holding companies beginning as of the March 31, 2012, report date (76 FR 7091). The FRB is considering the comments it received on the notice of its intent for SLHC reporting and will issue a proposal for reporting by SLHCs on or after July 21, 2011, which is the date that supervision of SLHCs is transferred from the OTS to the FRB.

Of the approximately 4,700 banks currently supervised by the FDIC, about 50 have stock that is registered with the FDIC pursuant to the Securities Exchange Act. (None of the 60 insured state-chartered savings associations for which the FDIC will become the supervisor as of July 21, 2011, has stock that is registered pursuant to the Securities Exchange Act.) For the small number of registered FDIC-supervised banks, quarterly and annual reports generally need not be filed until as many as 45 days and 90 days after the report date, respectively, while Call Reports generally must be received no later than 30 days after the report date. Moreover, the Call Reports have a fixed format to permit industry data aggregation by computer and automated monitoring of each individual institution's performance and condition. The financial statement format for registered banks is comparable to that of the Call Report, but each bank has the flexibility to expand or contract the level of detail on individual items as circumstances warrant. Such free-form reporting would make it extremely difficult for the FDIC to substitute the registered bank quarterly and annual reports for Call Reports.

Finally, some of the information contained in the Call Report is also developed by FDIC examiners during regular safety and soundness examinations of insured institutions. In addition, examiners check the Consolidated Reports of Condition and Income that institutions have submitted to the FDIC between examinations to ensure that the required data have been properly reported. However, using the examination process to develop quarterly Call Report data would be unworkable since one of the principal purposes of the supervisory and surveillance emphasis on the use of these data is for off-site monitoring of individual bank condition between examinations. Furthermore, examinations are conducted as of various dates throughout the year and at differing time intervals for different institutions. Thus, the examination process could not supply the banking agencies with financial data on a timely basis for all insured banks as of fixed dates each year.

5. <u>Minimizing the Burden on Small Depository Institutions</u>

Pursuant to regulations issued by the Small Business Administration (13 CFR 121.201), a "small entity" includes depository institutions with assets of $175 million or less. There are approximately 4,700 insured state nonmember banks that file Call Reports. Of this number, about 2,700 have total assets of $175 million or less. The FDIC is proposing that another 60 insured state-chartered savings associations join the reporting panel for the Call Report effective March 31, 2012, of which 45 have total assets of $175 million or less. As stated in Item 1 above, the Call Report requires the least amount of data from institutions with less than $100 million in total assets. The next least amount of data is collected from institutions with $100 million to $300 million in total assets.

With respect to this submission, the existing reporting thresholds that apply to particular schedules and data items in the Call Report will apply to the insured state-chartered savings associations joining the reporting panel for the Call Report, including those savings associations with total assets of $175 million or less.

6. <u>Consequences of Less Frequent Collection</u>

Less frequent collection of Call Reports would reduce the FDIC's ability to identify on a timely basis those institutions that are experiencing adverse changes in their condition so that appropriate corrective measures can be implemented to restore their safety and soundness. Such identification cannot be accomplished through periodic on-site examinations alone. To allocate its examination resources in the most efficient manner, off-site analysis of Call Report data to single out institutions in need of on-site follow-up must be performed (see Section 2 above). Submission of the Consolidated Reports of Condition and Income less frequently than quarterly would permit deteriorating conditions at institutions to fester considerably longer before they would be detected through the FDIC's computer-based monitoring systems, through the fortunate scheduling of an examination, or by other means. Such institutions would therefore run a greater risk of failure because of delays in effecting corrective action, either on institution management's own initiative or at the behest of the FDIC.

7. Special Circumstances

There are no special circumstances.

8. Summary of Public Comments

On February 8, 2011, the agencies proposed to implement changes to savings associations' data reporting requirements beginning with the March 31, 2012, report date.[2] The proposed changes would require savings associations to cease filing the TFR and commence filing the Call Report beginning as of the March 31, 2012, report date. This submission applies to the insured state-chartered savings associations for which the FDIC will become the primary federal bank regulatory agency on July 21, 2011.

The agencies collectively received comments from five savings associations and two bankers' organizations regarding the agencies' proposal for savings associations to convert to the Call Report from the TFR. None of the commenters took exception to the general proposal to have savings associations currently supervised by the OTS begin reporting regulatory financial data using the Call Report instead of the TFR sometime after the transfer date of July 21, 2011. However, there were comments received on some specific aspects of the proposed report conversion.

More specifically, the comments received from the individual savings associations all related to the proposal to eliminate the collection of data on TFR Schedule CMR – Consolidated Maturity/Rate and, with it, the elimination of the OTS Interest Rate Risk Model (OTS IRR Model). One savings association supported Schedule CMR elimination, noting that it used an internal model to monitor interest rate risk and it was a burden to reconcile the results of its own model to that of the OTS IRR Model. Four savings associations commented that they supported continuation of Schedule CMR since they relied on the OTS IRR Model to help monitor interest rate risk.

[2] 76 FR 7082.

Comments also were received from two bankers' organizations. Both organizations requested a one-year extension for the conversion from the TFR to the Call Report from the proposed implementation date of March 31, 2012, to an implementation date of March 31, 2013. The trade associations cited various burden concerns as a general basis for the one-year extension request.

After considering the comments received on the proposal, the agencies decided to proceed with the proposed conversion from the TFR to the Call Report for savings associations beginning on the March 31, 2012, report date, which would include the elimination of TFR Schedule CMR. For a complete discussion of the comments received on the proposed TFR-to-Call Report conversion and the agencies' responses to the comments, please refer to Section II.A, "Discussion of Comments," under "Current Actions" in the attached final Paperwork Reduction Act Federal Register notice for this submission, which was published on July 7, 2011.[3]

9. Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Confidentiality

At present, all data items collected from individual institutions in the Call Report are publicly available with the exception of any amounts reported in Schedule RI-E, item 2.g, "FDIC deposit insurance assessments"; Schedule RC-F, item 6.f, "Prepaid deposit insurance assessments"; and Schedule RC-O, Memorandum items 6 through 9 for higher-risk assets and Memorandum items 14 and 15 for counterparty exposures.

Contact information for depository institution personnel that is provided in institutions' Call Report submissions is not available to the public.

11. Information of a Sensitive Nature

The Call Report contains no questions of a sensitive nature.

12. Estimate of Annual Burden

It is estimated that, on average, it will take an FDIC-supervised bank approximately 40.47 hours each quarter to prepare its Call Report after making the necessary recordkeeping and systems changes that will enable it to generate the data required to be reported in the new assessment-related data items that took effect as of the June 30, 2011, report date. There are currently 4,687 FDIC-supervised banks. The estimated annual reporting burden for these

[3] 76 FR 39981.

FDIC-supervised banks is 758,732 hours. This annual reporting burden has been estimated by considering the varying numbers of items potentially reportable by banks of different sizes and with foreign offices and the extent to which such banks will actually have amounts to report in these items as a result of the activities and transactions in which they are engaged. Then, based on the agency staff's understanding of banks' recordkeeping and reporting systems and their customary and usual business practices, professional judgment has been applied to arrive at a burden estimate for the Call Report. The average ongoing reporting burden for the Call Report is estimated to range from 17 to 700 hours per quarter, depending on an individual institution's circumstances.

Given the sizes and activities of the 60 insured state-chartered savings associations that the FDIC will begin supervising on the transfer date of July 21, 2011, the estimated average burden for preparing and filing the Call Report for the existing FDIC-supervised banks is believed to be representative of the ongoing burden (after the initial conversion burden discussed below) that would apply to savings associations when they begin to submit the Call Report in place of the TFR. Thus, the estimated annual reporting burden for preparing and filing the Call Report for the 60 FDIC-supervised savings associations is 9,713 hours.

In addition to the burden associated with preparing and filing the Call Report, savings associations will incur an initial burden of converting systems and training staff to prepare and file the Call Report in place of the TFR. As a general statement, larger institutions and those with more complex operations would expend a greater number of hours than smaller institutions and those with less complex operations. An institution's use of service providers for the information and accounting support of key functions, such as credit processing, transaction processing, deposit and customer information, general ledger, and reporting should result in lower burden hours for converting to the Call Report. Institutions with staff having experience in preparing and filing the Call Report should incur lower initial burden hours for converting to the Call Report from the TFR. Based on the findings of a telephone survey conducted by the OTS of certain former savings associations that recently had to convert from reporting on the TFR to reporting on the Call Report because of a change in charter, the time to convert to filing the Call Report during the first year, including necessary systems changes and training staff on Call Report preparation and filing, is estimated to average 188 hours.[4] Thus, the estimated burden for the first year for the 60 FDIC-supervised savings associations to convert systems and conduct training is 11,280 hours.

For all 4,747 FDIC-supervised institutions following the conversion of savings associations from the TFR to the Call Report, the estimated total annual burden of the Call Report information collection, including the first year burden arising from the conversion, is 779,725 hours.

For FDIC-insured commercial banks, Call Report data as of March 31, 2011, indicate that salaries and employee benefits per full-time equivalent employee currently average about $42.00 per hour. Thus, the annual recurring salary and employee benefit cost to state nonmember banks for the Call Report burden hours shown above is estimated to be $31.9 million. This cost is

[4] For further information on the OTS's telephone survey that was used to estimate the first year burden of converting from the TFR to the Call Report, please refer to Section II.A, "Discussion of Comments," under "Current Actions" in the attached final Paperwork Reduction Act Federal Register notice for this submission, which was published on July 7, 2011.

based on the application of the $42.00 average hourly rate to the estimated total ongoing annual reporting burden of 758,732 hours.

For FDIC-insured savings institutions, Call Report and TFR data as of March 31, 2011, indicate that salaries and employee benefits per full-time equivalent employee currently average about $38.25 per hour. Thus, for the Call Report burden hours shown above, the annual salary and employee benefit cost to the 60 insured state-chartered savings associations that the FDIC will begin supervising is estimated to be <u>$0.8 million</u>. This cost is based on the application of the $38.25 average hourly rate to the estimated total annual reporting burden of 20,993 hours for these savings associations, including the first year burden arising from the conversion.

For all <u>4,747</u> FDIC-supervised institutions following the conversion of savings associations from the TFR to the Call Report, the annual salary and benefit cost of the Call Report information collection, including the first year burden for savings associations arising from the conversion, is estimated to be <u>$32.7 million</u>.

13. <u>Estimate of Total Annual Cost Burden</u>

Depository institutions maintain extensive internal recordkeeping systems from which financial statements and tax returns are prepared and other reports are generated so that the institution's management can keep informed about the institution's condition and performance and have the data necessary to operate their institution in a safe and sound manner. These records also serve as a source for the data submitted in the Call Report, although institutions generally maintain some records solely to enable them to complete these reports. Computerized institutions commonly have software and programs that compile data that need to be reported in the Call Report. An institution's records may be generated and processed internally, externally by an outside servicer, or by a combination of both methods. In addition, virtually all institutions now use software to assist in the actual preparation of the Call Report.

The total operation and maintenance and purchase of services component of the total annual cost burden to state nonmember banks (excluding costs included in Item 12 above) is estimated to be <u>$20.5 million</u>. This cost is based on the application of an average hourly rate of $27.00 to the estimated total annual reporting burden of 758,732 hours. For the savings associations that will be supervised by the FDIC after the transfer date, the total operation and maintenance and purchase of services component of the total annual cost burden (excluding costs included in Item 12 above) is estimated to be <u>$0.3 million</u>. This cost is based on the application of an average hourly rate of $27.00 to the estimated total annual reporting burden of 9,713 hours. These estimates reflects recurring expenses (not included in Item 12 above) incurred by institutions in the Call Report preparation and filing process, including expenses associated with software, data processing, and records that are not used internally for management purposes but are necessary to complete the Call Report.

Capital and start-up costs arising from the TFR-to-Call Report conversion (excluding costs to convert systems and conduct training included in Item 12 above) will vary from savings association to savings association depending upon an association's individual circumstances, including its use of service providers for the information and accounting support of key functions related to recordkeeping and reporting. An estimate of this cost component cannot be determined at this time.

14. Estimate of Total Annual Cost to the Federal Government

The annual cost to the FDIC of the Call Report information collection system is estimated to be not more than $10.0 million. This amount includes the cost of:

- developing reporting requirements, instructions, and data validation edits;
- computer processing and hosting, including maintaining and modifying software programs, associated with the CDR system for collecting and validating Call Reports; and
- FDIC personnel involved in the preceding tasks and in the review and validation of reported data.

As part of the conversion of savings associations from filing the TFR to filing the Call Report, the entire staff of the OTS Financial Reporting Division (FRD) is being transferred to the FDIC effective with the July 21, 2011, transfer date. The FRD staff currently responds to savings association TFR questions and is the primary contact for savings associations with questions regarding TFR content issues as well as technical filing issues. The FRD staff currently has caseloads of savings associations and the transfer of FRD staff as a unit will help provide savings associations with consistency by having the same points of contact throughout the report conversion process. The estimated cost of the Call Report information collection system reflects the estimated FRD personnel cost.

15. Reason for Change in Burden

The change in burden associated with this submission is caused by the transfer of supervisory responsibility for 60 insured state-chartered savings associations from the OTS to the FDIC on the transfer date and the conversion of savings associations from filing the TFR to filing the Call Report effective as of the March 31, 2012, report date. This submission does not involve a change in the content of the Call Report.

Currently, there are 4,687 FDIC-supervised banks submitting quarterly Call Reports. This number will increase to 4,747 institutions after the TFR-to-Call Report conversion. The analysis of the change in burden is as follows:

Currently approved burden	758,732 hours
Adjustment (change in use):	
First year burden to convert systems and conduct training	+11,280 hours
Report preparation and filing	+9,713 hours
Requested (new) burden:	779,725 hours
Net change in burden:	+20,993 hours

The impact of the conversion from the TFR to the Call Report that is the subject of this submission will vary from savings association to savings association depending upon an association's individual circumstances.

16. Publication

The information collected in Call Reports from FDIC-supervised institutions is primarily intended to meet the FDIC's internal needs (see Item 2 above). However, except for the Call Report items afforded confidential treatment and contact information for bank personnel (see Item 10 above), the FDIC makes individual banks' entire Call Reports available to the public on the Internet. These data can be accessed on the FFIEC CDR Public Data Distribution Web site (https://cdr.ffiec.gov/public/).

Summary statistical data that provide a financial profile of each individual FDIC-insured institution also are available to the public on the Internet. The financial information is taken from the Call Report and the TFR and includes balance sheet, income statement, and other key data for several periods. Regulatory capital ratios and profitability ratios such as return on assets and return on equity also are provided. In addition, interested persons can purchase a computer tape containing the quarterly Call Report information for all banks from the National Technical Information Service of the U.S. Department of Commerce.

Call Report and TFR data also form the basis for certain quarterly FDIC publications, including the Quarterly Banking Profile and Statistics on Banking, which present a variety of statistical data on the banking industry. These publications are available on the Internet.

The UBPR, which the agencies now process using the CDR system, is generated using Call Report data as its primary input (see Item 2 above). The UBPR is also publicly available for individual banks on the FFIEC CDR Public Data Distribution Web site.

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.