

SUPPORTING STATEMENT
Savings and Loan Holding Company Registration Statement H-(b)10
OMB Control No. 1550-0020

A. JUSTIFICATION

1. Circumstances and Need

Section 10(b)(1) of the Home Owners' Loan Act ("Act"), as amended (12 U.S.C. 1467a(b)(1)), and 12 C.F.R. 584.1(a) of the Regulations provide that each savings and loan holding company is required to register with the Office of Thrift Supervision ("OTS") by filing a Registration Statement, H-(b)10 ("Statement"). This Statement shall be filed no later than 90 days of becoming a savings and loan holding company. A Statement is not required upon acquisition of additional savings associations.

There are no third party requirements for this Statement.

2. Use of Information Collected

The Statement is used to collect information concerning the acquisition, as well as any changes to intercompany relationships of the savings and loan holding company and its subsidiaries since submission of the holding company acquisition application.

OTS reviews the Statement for adequacy of answers to items and completeness in all material respects. In particular, OTS reviews each Statement to determine whether there has been adequate disclosure of pertinent facts. The Statement provides factual information concerning the date of consummation of transactions and the number of shares acquired whereas estimates of such information are provided in the application. In addition, a requirement is contained in the Statement concerning changes to information filed during the application process.

3. Use of Technology to Reduce Burden

The use of automated systems by the respondents may be somewhat helpful in obtaining the necessary information to respond to this information collection. This is true largely with respect to gaining access to the forms electronically and printing them out. In this regard, the use of improved technology has been accounted for in the total burden imposed on savings and loan holding companies and is neither significant nor measurable. However, because the named form is largely narrative and requires that numerous documents and other information be researched, prepared, or obtained from various sources, and then submitted as attachments to the form, the use of improved

technology would not significantly reduce the burden associated with this information collection.

4. **Efforts to Identify Duplication**

This information collection is not duplicative within the meaning of the PRA and OMB regulations. This information is only available from the records of the individual holding companies. 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 statutory provisions do not distinguish a respondent by the size of its business. All savings and loan holding companies are required to register with the OTS. It should be noted that small companies or non-operating companies experience significant changes less frequently and, therefore, may have a lesser reporting burden than a larger operating company.

6. **Consequences of Less Frequent Collection**

In the event a holding company did not register with OTS, OTS would be unable to assess any changes between the time the acquisition application was submitted and the actual consummation of the acquisition. Such changes could affect the safety and soundness of subsidiary savings associations.

7. **Special Circumstances Necessitating Collection Inconsistent With 5 C.F.R. Part 1320**

The information collection is conducted in a manner consistent with the guidelines set forth in 5 C.F.R. 1320.5(d)(2).

8. **Consultation with persons outside the OTS**

Notice of intent to renew this information collection was published in the Federal Register on October 1, 2008 (73 FR 191). OTS has not received any comments.

9. **Payment of Respondents**

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

10. **Confidentiality**

As a general rule, all reports filed pursuant to the Act are public information. Confidential treatment is granted to certain biographical information to encourage disclosure of relevant “managerial resources” usually considered proprietary and to certain financial projections so that publicly held holding companies can remain in compliance with regulations promulgated under the Securities and Exchange Act of 1934 and rules of the major stock exchanges. A request for relief from this requirement may be made for good cause.

11. **Information of a Sensitive Nature**

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

12. **Estimate of Annual Hour Burden**

The total annual hour burden to the respondents is estimated at 520 hours, representing 65 applications at 8 hours per submission.

13. **Estimate of Annual Cost Burden**

The total annual cost to the respondents is estimated at \$52,000, representing 65 responses averaging a response time of 8 hours each at approximately \$100 per hour.

14. **Estimate of Annualized Cost to Government**

The initial printing and distribution cost to the government for this data collection was approximately \$500. Each new holding company and a limited number of OTS staff will receive a copy of the form. It is intended that the form be used as a set of instructions and duplicated as needed.

The information from these forms is reviewed individually. The total annual cost to the government for such review is estimated at \$13,000, consisting of 65 total responses and 4 hours of review per response at a rate of \$50.00 per hour. There is no editing, tabulation, coding, or publication.

15. **Reason for Change in Burden**

The reduction in burden is the result of fewer Statements being filed with OTS.

16. **Publication**

Not applicable.

17. **Expiration Date**

OTS requests permission to not display the expiration date on the forms. The OMB Control Number is displayed in the regulation table at 12 C.F.R. 506.1.

18. **Exceptions**

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

B. **COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

Not applicable.