

Attachment A

13. Annual Reporting and Recordkeeping Hour Burden

Part 151 – Position Limits for Derivatives

OMB Collection File 3038-NEW

Number of Respondents: Depends based on type of reporting or recordkeeping requirement (see below)

Estimated Total Annual Responses 42,597

Estimated Average Hours Per Response: 10

% of Responses Collected Electronically: 100%

Estimated Total Annual Labor Costs: \$24.2 million

Frequency of Reporting: Depends based on type of reporting or recordkeeping requirement (see below)

| | Total Number of Respondents (13(a)) | Estimated Number of Hours Per Response | Total Annual Responses (13(b)) | Total Annual Hours Requested (13(c)) | Difference (13(e)) | Total Annual Labor Costs |
|--|--|---|---|---|-------------------------------|-------------------------------------|
|--|--|---|---|---|-------------------------------|-------------------------------------|

| | | | | | | |
|---|-----|---------|--------|---------|---------|--------------|
| | 0 | 0 | 0 | 0 | 0 | 0 |
| DCM estimated deliverable supply report | 5 | 200.00 | 25 | 5,000 | 5,000 | \$393,054 |
| 404 (bona fide hedging exemption-related (“BFH”)) | 90 | 10.00 | 1,080 | 10,800 | 10,800 | \$848,996 |
| 404A (BFH) | 90 | 10.00 | 270 | 2,700 | 2,700 | \$212,249 |
| 404S (BFH) | 45 | 30.00 | 540 | 16,200 | 16,200 | \$1,273,495 |
| BFH Recordkeeping | 160 | 1.00 | 40,000 | 40,000 | 40,000 | \$3,144,432 |
| 401 (visibility level-related) | 48 | 30.00 | 192 | 5,760 | 5,760 | \$452,798 |
| 404 (visibility) | 25 | 20.00 | 100 | 2,000 | 2,000 | \$157,222 |
| Disaggregation applications | 90 | 2500.00 | 90 | 225,000 | 225,000 | \$17,687,428 |