Attachment B

14. Annual Reporting and Recordkeeping Cost 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 Appendix A)
Estimated Total Annualized Annualized Capital and Start-up Costs:	\$45.6 million

Estimated Total Annual Operating and Maintenance \$3.7 million Costs:

Type of Respondent	Total Number of Respondents	Total Annualized Capital/Start-up Costs (14(a))	Total Annual Operating & Maintenance Costs (14(b))
DCM estimated			
deliverable supply			
report	5	\$25,000	\$25,000
404 (bona fide			
hedging)	90	\$10,800,000	\$450,000
404A (BFH)	90	\$5,400,000	\$450,000
404S (BFH)	45	\$9,000,000	\$225,000
BFH Recordkeeping	160	\$9,600,000	\$800,000
401 (visibility)	48	\$4,800,000	\$240,000
404 (visibility)	25	\$1,500,000	\$125,000
Disaggregation			
applications	90	\$4,500,000	\$1,350,000