

**Supporting Statement**  
**OMB Control No. 1557-0100**  
**(MA) - Country Exposure Report and Country Exposure Information Report**  
**(FFIEC Forms 009 and 009a)**

**A. Justification**

**1. Circumstances that make the collection necessary:**

This information collection is mandatory under the reporting authority found at 12 U.S.C. 161 and 1817 (national banks) and 12 U.S.C. 1464 (savings associations).

**2. Use of the information:**

The Country Exposure Report (FFIEC 009) is filed quarterly with the agencies and provides information on international claims of U.S. banks, savings associations, and bank holding companies that is used for supervisory and analytical purposes. The information is used to monitor country exposure of banks to determine the degree of risk in their portfolios and the possible impact on U.S. banks of adverse developments in particular countries. The Country Exposure Information Report (FFIEC 009a) is a supplement to the FFIEC 009 and provides publicly available information on material foreign country exposures (all exposures to a country in excess of 1 percent of total assets or 20 percent of capital, whichever is less) of U.S. banks, savings associations and bank holding companies that file the FFIEC 009 report. As part of the Country Exposure Information Report, reporting institutions also must furnish a list of countries in which they have lending exposures above 0.75 percent of total assets or 15 percent of total capital, whichever is less.

**3. Consideration of the use of improved information technology:**

These reports are collected and processed by the Board of Governors of the Federal Reserve (Board) on behalf of the agencies via the Federal Reserve System's Internet Electronic Submission (IESUB) system. Electronic filing capability via IESUB is available on the Internet through the use of data entry or a file transfer feature. These methods are secure and result in a minimal burden to institutions. The agencies no longer accept paper (hard copy) reports from banks and bank holding companies.

**4. Efforts to identify duplication:**

The data are unique. They are not otherwise collected.

**5. Methods used to minimize burden if the collection has a significant impact on substantial number of small entities:**

The collections of information do not involve small entities. Institutions with aggregate international exposures of under \$30 million are not required to file either report.

**6. Consequences to the Federal program if the collection were conducted less frequently:**

Federal statutes preclude less frequent reporting and disclosure. Further, since the information is used for supervisory purposes and for persons to make financial decisions, outdated information would have much less practical utility to the users of the information.

**7. Special circumstances necessitating collection inconsistent with 5 CFR Part 1320:**

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.

**8. Efforts to consult with persons outside the agency:**

On November 23, 2011, the OCC, the Board, and the FDIC jointly published a notice soliciting comments for 60 days a proposal to extend without revision the currently approved information collection of the FFIEC 009 and FFIEC 009a (76 FR 72497). No comments were received.

**9. Payment to respondents:**

There is no payment to respondents.

**10. Any assurance of confidentiality:**

The FFIEC 009 information collection is given confidential treatment (5 U.S.C. 552(b)(4) and (b)(8)). The FFIEC 009a information collection is not given confidential treatment.

**11. Justification for questions of a sensitive nature:**

No questions of a sensitive nature are asked.

**12. Burden estimate:**

Estimated Number of Respondents: 16 (FFIEC 009), 9 (FFIEC 009a).

Frequency of Response: Quarterly.

Estimated Average Time per Response: 70 burden hours (FFIEC 009), 5.25 burden hours (FFIEC 009a).

Estimated Total Annual Burden: 4,480 burden hours (FFIEC 009), 189 burden hours (FFIEC 009a).

The OCC estimates the cost of the hour burden to respondents as follows:

Clerical:	30% x 4,669	=	1,400.70	@ \$20 = \$	28,014.00
Managerial/Technical:	65% x 4,669	=	3,034.85	@ \$40 = \$	121,394.00
Senior Mgmt/Professional:	05% x 4,669	=	233.45	@ \$80 = \$	18,676.00
Total:					\$ 168,084.00

**13. Estimate of annualized costs to respondents:**

None.

**14. Estimate of annualized costs to the government:**

None.

**15. Change in burden:**

-3,458 burden hours. The reduction in burden is due to the decrease in the number of regulated entities.

**16. Information regarding collections whose results are planned to be published for statistical use:**

See Item # 2.

**17. Display of expiration date:**

Not applicable.

**18. Exceptions to certification statement:**

None.

**B. Collections of Information Employing Statistical Methods**

Not applicable.