



atement.

ell as exceptions to any methods used.

pository affiliates, as well as half of the FTC's burden net that which is attributed to the FTC for motor  
gulation, the Fed's burden and cost numbers were used, except for the OTS where the OCC's estimates were  
e total affected by the regulation, CFPB's affected number of respondents for that line item was calc  
heir original breakdown, with some assumptions made if breaking them up would still keep the acc  
n the CFPB's burden acquisition, since presumably the firms have already implemented these chang  
and the one-time burden calculated for these changes reflected in the PRA Supporting Statement is  
regulatory agency used for any ongoing burden costs imposed on firms. The exception is for the FTC  
iate portion from the other agencies' supporting statements based on the CFPB's burden assumed f

s and all of their depository affiliates and consumer finance related non-depository affiliates, which  
in addition to all those entities changing enforcement authorities from the OTS. For those entities  
anges are relatively minor and simple. This estimate is an extrapolation from previous one-time est

anges are relatively minor and simple. This estimate is an extrapolation from previous one-time est

anges are relatively minor and simple, and with a total of eleven forms changing, there should be in

num add up.

vehicle dealers. Dodd-Frank carves-out a specific section of motor vehicle dealers from the FTC for  
: used where possible.

culated using the ratio of that number/total affected \* the total number transferring to the CFPB.

uracy of the numbers and would fit well with line items from other agencies.

es. The CFPB only assumed each agency's respective portion of ongoing burden. With respect to th  
only for those entities for which the CFPB has enforcement authority. This burden is new burden a  
C, since they used multiple cost structures for different burden items, a standard cost structure was  
from each respective agency who calculated these costs.

are those entities which the CFPB has enforcement authority. For those entities under both the en  
under both the enforcement authority of the CFPB and the FTC, this burden is the full amount creat  
timates that the Fed has done.

timates that the Fed has done.

increased efficiency with making multiple changes of the same thing. This estimate is an extrapolatic

· CFPB regulatory authority, however due to the calculation difficulty of carving out this smaller sect

e FTC, however, since the FTC annualizes the one-time burden over the three-year clearance of the  
nd was not assumed during the restatement process.

used for them, taken from the estimates used by the FTC for TILA burden costs.

forcement authority of the CFPB and the FTC, the CFPB and FTC are splitting the burden.

ed by the changes in forms.

on from previous one-time estimates that the Fed has done.

ion, the FTC has attributed all burden attributed to motor vehicle dealers to themselves.

Supporting Statement, the CFPB did take half of their one-time burden for the one-time changes in

the FTC's Supporting Statements.

**Fed**

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	<i>Estimated number of respondents</i>	<i>CFPB carve-out</i>	<i>Estimated annual frequency</i>	<i>Estimated response time (hours)</i>
Negative information notice (Section 217)	30,000	25	1	0.25
<b>Affiliate marketing opt-out notice (Section 214)</b>				
Financial Institutions	2,619	25	1	18
Consumer Response	638,380	6,094	1	0.083
Red flags (Sections 114 and 315)[2]	1,172	25	1	41
<b>Risk-based pricing (Section 311)</b>				
Notice to consumers (on-going)	18,173	25	12	5
<b>Furnisher duties (Section 312)</b>				
Policy & procedures	1,172	25	1	40
Irrelevant dispute notices	611,966	13,054	1	0.23

One-time form changes			
H Forms	25	7	2
M Form	25	1	2
I, K, N Forms		3	2
<b>Total</b>			
Ongoing			
One-time			

\*Cost estimates for Fed in the SS are stated to be \$16 for Office Support and \$49 for Financial Man;



**FDIC**

41

*Estimated  
annual burden  
hours*

Total Costs

*Respondents*

6	\$271
450	\$19,530
508	\$10,665
1,025	\$44,485
1,500	\$65,100
1,000	\$43,400
3,046	\$132,194

Banks	5,104
Frivolous or Irrelevant Dispute Notices	100,100

350	\$15,190
50	\$2,170
0	\$0
<u>7,935</u>	<u>\$333,004</u>
7,535	\$315,644
<u>400</u>	<u>\$17,360</u>

One-time form changes	
H Forms	
M Form	
I, K, N Forms	
<u>Total</u>	
Ongoing	
<u>One-time</u>	

agers, although they clearly used \$17 and \$50 in their

<i>CFPB carve-out</i>	<i>Annual frequency</i>	<i>Time (hours)</i>	<i>Estimated annual burden hours</i>	<i>Total Costs</i>	
41	1	40	1,640	\$	101,106
805	1	0.23	188	\$	18,020

41	7	2	574	\$	35,387
41	1	2	82	\$	5,055
	3	2	-	\$	-
			2,484	\$	159,568
			1,828	\$	119,126
			656	\$	40,442

**OCC**

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	<i>Respondents - OCC</i>	<i>Respondents - OTS</i>	<i>Total OCC &amp; OTS</i>	<i>CFPB carve- out</i>
Separate Notice - Ongoing	90	39	129	5
Consolidated Notice - Ongoing	270	116	386	15
Consolidated, but not perpetual opt out notices	135	58	193	8
Consumer Opt-out - Consolidated notices	406,125	145,109	551,234	2,049
Consumer Opt-out - Not consolidated notices	135,375	48,370	183,745	6,828

One-time form changes

H Forms

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M Form

86

I, K, N Forms

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Total

Ongoing

One-time

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<i>Frequency</i>	<i>Time (hours)</i>	<i>Estimated annual burden hours</i>	Total Costs
1	2	10	\$434
1	1	15	\$651
1	1	8	\$347
1	0.017	34	\$1,482
1	0.067	455	\$19,756





**NCUA**

3

	<i>Respondents</i>	<i>CFPB carve-out</i>	<i>Frequency</i>	<i>Time (hours)</i>
Develop program	5,245	3	1	25
Preparing annual report	5,245	3	1	4
Training	5,245	3	1	2
Developing policies and procedures to assess the validity of changes of addresses	5,245	3	1	4
Developing policies and procedures to respond to notices of address discrepancies	5,245	3	1	4

One-time form changes

H Forms	3	7	2
M Form	3	1	2
I, K, N Forms		3	2
Total			
Ongoing			
One-time			

**FTC**

<i>Estimated annual burden hours</i>	Total Costs		
	No cost to respondents; No cost to gov't		
75	\$	3,255	<u>128 (Free Annual File Disclosures)</u>
12	\$	521	New annual file disclosure requests - '07
6	\$	260	CRA's have to remove advertising until after consumer has obtained requested annual file disclosure - '09
12	\$	521	
12	\$	521	<u>131 (FACT Act Affiliate Marketing Rule )</u>
			Non-GLBA entities under the FACT Act Affiliate Marketing Rule
			GLBA entities under the FACT Act Affiliate Marketing Rule
			<u>132 (Prescreen Opt-Out Disclosure Rule)</u>
			Prescreen Opt-Out Disclosure Rule
			<u>144 (Procedures to Enhance the Accuracy and I</u>
			660.3 rqmt to implement written policies to ensure accurate info, related training - Initial
			660.3 rqmt to implement written policies to ensure accurate info, related training - Recurring

660.4 rqmts to amend procedures to handle complaints directly from consumers - Initial

660.4 implementation of rqmt to notify consumers that a dispute is frivolous - Initial

Time to prepare a sec.660.4 notice of frivolous or irrelevant dispute - Ongoing

145 (Fair Credit Reporting Risk-Based Pricing Re

Additional one-time burden to implement proposed amendments

Initial cost to implement changes

One-time form changes

H Forms

M Form

I, K, N Forms

Total

Ongoing

One-time

42	\$	1,823
6	\$	260
-	\$	-
165	\$	7,161
117	\$	5,078
48	\$	2,083

<i>Respondents</i>	<i>Auto dealer carve-out</i>	<i>New estimated number of respondents</i>	<i>FTC half + auto- dealers</i>	<i>CFPB half</i>
26,690,000		26,690,000	13,345,000	13,345,000
3		3	2	1
220,356	20	220,336	110,188	110,168
3,350	1,838	1,512	2,594	756
750	225	525	488	262
6,133	1,840	4,293	3,986	2,147
6,133	1,840	4,293	3,986	2,147

6,133	1,840	4,293	3,986	2,147
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6,133	1,840	4,293	3,986	2,147
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21,720	217	21,503	10,968	10,752
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199,500	117,631	81,869	158,566	40,934
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199,500	117,631	81,869	158,566	40,934
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199,500	117,631	81,869	158,566	40,934
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6,133	1,840	4,293	3,987	2,146
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379		379	190	189
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<i>Frequency</i>	<i>Estimated response time (hr)</i>	<i>Time annualized over 3 years</i>	<i>Auto dealer carve-out burden (hr)</i>	<i>FTC burden (hr)</i>	<i>CFPB estimated total annual burden (hr)</i>
1			-	155,500	155,500
1	12	12	-	24	12
1	14	4.67	93	514,211	514,117
1	14	4.67	8,577	12,105	3,528
1	2	2	450	976	524
1	24	8.00	14,720	31,888	17,176
1	4	1.33	2,453	5,315	2,863

1	8	2.67	4,907	10,629	5,725
1	8	2.67	4,907	10,629	5,725
1	0.233	0.233	51	2,559	2,509
1	32	10.67	1,254,731	1,691,371	436,629
1	220	73.33	8,626,273	11,628,173	3,001,827
7	2	2	1,646,834	2,219,924	573,076
1	2	2	3,680	7,974	4,292
3	2	2	-	1,140	1,134
					4,724,637
					4,146,135
					578,502



**CFPB**

Total Costs	Non-labor Costs	CFPB split
\$ 2,595,000	\$ 8,390,000	\$ 4,195,000
\$ 710		
\$ 16,977,623		
\$ 149,209		
\$ 131,000		
\$ 704,216		
\$ 117,369		

\$	234,739	
\$	234,739	
\$	46,413	
\$	18,753,230	
\$	51,716,016	
\$	17,822,664	
\$	133,481	
\$	35,267	
\$	109,651,676	\$ 4,195,000
\$	91,660,263	
\$	17,991,412	
		Total
		Ongoing
		One-time
		Industry before CFPB

*Estimated number of respondents*      *Estimated annual frequency*      *Estimated response time (hours)*      *Estimated annual burden hours*

Total Costs

Non-labor Costs

