

Office of the Comptroller of the Currency
Supporting Statement
Customer Complaint Form
OMB Control No. 1557-0232

A. Justification.

1. Circumstances that make the collection necessary:

The customer complaint form was developed as a courtesy for those that contact the Office of the Comptroller of the Currency's (OCC) Customer Assistance Group (CAG) and wish to file a formal, written complaint. The form allows the consumer to focus their issues and provide a complete picture of their concerns, but is entirely voluntary. It is designed to prevent having to go back to the consumer for additional information, which delays the process. Completion of the form allows the CAG to process the complaint more efficiently.

This collection of information is solicited pursuant to the Federal Trade Commission Act, 15 U.S.C. 57a(f)(1), the purpose of which is to prevent unfair or deceptive acts or practices in or affecting commerce, including acts or practices which are unfair or deceptive to consumers by banks. Agencies must establish a separate division of consumer affairs to receive and take appropriate action upon complaints with respect to such acts or practices by banks subject to its jurisdiction.

2. Use of the information:

The Customer Assistance Group will use the information to create a record of the consumer's contact, including capturing information that can be used to resolve the consumer's issues and provide a database of information that is incorporated into the OCC's supervisory process.

3. Consideration of the use of information technology:

Respondents may use any available information technology to complete the form. Consumers can access the form at the www.HelpWithMyBank.gov web site. The web site is available to assist customers of national banks or federal savings associations (thrifts) and other financial institutions with questions common to all banking customers. The OCC's www.occ.gov web site also provides a link to the www.HelpWithMyBank.gov web site. Consumers have the option to file a complaint using an on-line form for which they will receive an email confirmation or download a PDF form that can be completed and mailed or faxed to the Customer Assistance Group. Both the on-line form and the PDF form are available in English and Spanish language formats.

The on-line form contains sections that match the PDF form, which are presented on a single visible page. Required fields are also highlighted and asterisked for user friendliness. The

consumer can navigate forwards and backwards through the form using Next and Previous links at the bottom of each section. The form contains an on-line certification that replaces the PDF form's signature line and provides the Privacy Act Statement. Consumers are able to print the on-line submission when complete. The on-line form streamlines the customer complaint process by providing a form that is accessible for submission at any time.

4. Efforts to identify duplication:

July 21, 2011, marked the anniversary of the Dodd-Frank Consumer Protection and Wall Street Reform Act. On that day, the Bureau of Consumer Financial Protection (CFPB) gained authority to supervise large banks and federal savings associations with more than \$10 billion in assets for compliance with certain consumer protection laws. Part of that authority includes the handling of consumer complaints related to those large financial companies.

The Office of the Comptroller of the Currency will continue to process questions and complaints concerning consumer issues within the jurisdiction of the OCC through our Consumer Assistance Group (CAG) and will continue to send misdirected complaints it receives to the appropriate federal or state regulator.

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

Not applicable.

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

Less frequent collection would substantially impair the effectiveness of the program.

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

The information collection is conducted in accordance with OMB guidelines in 5 CFR Part 1320.

8. Efforts to consult with persons outside the agency:

Representatives from the OCC and the CFPB as well as the other FFIEC agencies have been meeting on a regular basis since the passage of Dodd – Frank to establish policies and procedures incorporating the requirements of the Act into each agencies processes, including the processing of consumer complaints. On June 21, 2012, the OCC published a 60-day *Federal Register* Notice for this collection. 77 FR 37475. No comments were received on the information collection.

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

There is no assurance of confidentiality.

11. Justification for questions of a sensitive nature:

The form contains requests for personal identifiable information such as the consumer's name, address, telephone number(s), and email address. This information is needed to process the complaint.

12. Burden estimate:

40,000 respondents @ 1 response = 80,000 responses
40,000 responses @ 0.083 hour = 3,320 burden hours

The estimated cost of the reporting and disclosure hour burden is as follows:

3,320 burden hours @ \$20 = \$ 66,400

13. Estimate of annualized costs to respondents:

Not applicable.

14. Estimate of annualized costs to the government:

Not applicable.

15. Changes in burden:

Former:	81,180 respondents;	81,180 responses;	6,738 hours
New:	40,000 respondents;	40,000 responses;	3,320 hours
Difference:	- 41,180 respondents;	- 41,180 responses;	- 3,418 hours

Reason for change in burden:

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

No publication for statistical use is contemplated.

17. Display of expiration date:

Not applicable.

18. Exceptions to certification statement:

Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.