



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

August 7, 2013

Shagufta Ahmed
Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20530

Dear Ms. Ahmed:

The Office of the Comptroller of the Currency (OCC) hereby requests approval prior to October 1, 2013, for a new collection of information contained in its Lending Limits final rule (78 FR 37930 (June 25, 2013)) pursuant to the Office of Management and Budget's (OMB) Paperwork Reduction Act (PRA) emergency processing procedures at 5 C.F.R. § 1320.13.

The OCC has determined that (1) the collection of information within the scope of this request is needed prior to the expiration of time periods established under 5 C.F.R. § 1320.12; (2) this collection of information is essential to the mission of the OCC; and (3) the OCC cannot reasonably comply with the normal clearance procedures because an unanticipated event has occurred and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

The Lending Limits final rule included a new information collection requirement generated in response to public comment. In response to comments received, OCC clarified the model approval process in 12 C.F.R. § 32.9 to provide that a model (other than the model approved for purposes of the Advanced Measurement Approach in the capital rules) must be approved by the OCC specifically for part 32 purposes and must be approved in writing. If a national bank or Federal savings association proposes to use an internal model that has been approved by the OCC for purposes of the Advanced Measurement Approach, the institution must provide prior written notification to the OCC prior to use of the model for lending limits purposes. OCC approval is also required before substantive revisions are made to a model that is used for lending limits purposes.

The addition of this information collection at the final rule stage prevents the OCC from clearing the collection under 5 C.F.R. § 1320.11, which covers only collections of information contained in proposed rules. As noted in 5 C.F.R. § 1320.5 (c)(1), the OCC must clear the collection under 5 C.F.R. § 1320.10, which relates to information collections not contained in proposed rules or current rules. The OCC submitted the collection to OMB under 5 C.F.R. § 1320.11, and the ROCIS System accepted the submission due to a system error. There is insufficient time to obtain

clearance under 5 C.F.R. § 1320.10 prior to the rule's October 1, 2013 effective date. Therefore, the OCC is requesting emergency clearance.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Stuart E. Feldstein". The signature is fluid and cursive, with a large initial "S" and "F".

Stuart E. Feldstein

Director

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency