

<b>Number of LM-20 Reports</b>									
				Average Percentage of Employers utilizing consultants to manage counter-organizing campaigns	Number of Trade Associations Offering Seminars	Number of Law/Consultant Firm Independently-Facilitated Seminars	Total Number of Seminar Reports	Increase over previous ICR	Increase Over NPRM
<b>Total:</b>	4194.44	2658	40	0.78	1045	1045	2090	3807.44	1593.44
		Number of non-seminar reports	Ratio of Reports/Filer						
		2104.44	5.875						
<b>Total of LM-20 Filers</b>			<b>Reports Per Filer</b>						
Sub-total for number of law/consultant firms:			Sub-total for number of reports per filer						
	358.202553191489		11.7096876128566						
<b>Total Form LM-10 Reports/Filers Total:</b>	Number of Persuader Agreement Reports	Number of 203(a) (1)-(3) Reports	Increase Over Previous ICR	Increase Over NPRM					
	2777.04	2104.44	672.6	1820.04	-636.96				
<b>Non-Filing Entities</b>	Law Firms	Business Associations	Consultant Firms						
Total:	17387	15808	6461						
	39297.7974468085								

**Reporting and Recordkeeping Burden Hours for Persader Reporting**

Form	Number of Reports Filed	Recordkeeping Burden for all reports (in minutes)	Total Recordkeeping Hours for all reports	Total Reporting burden for all reports (in minutes)	Total Reporting Hours for all reports	Total Burden for all reports (in minutes)
<b>Form LM-20 (Revised Forms Submitted)</b>	4194.44	62916.6	1048.61	348138.52	5802.30866667	411055.12
<b>Form LM-10 (Revised Form Filers/Forms Submitted)</b>	2777.04	69426	1157.1	338798.88	5646.648	408224.88
<b>Total of Form LM-20 Filers</b>						
Sub-total for number of law firms/consultants:	11.70968761	175.645314193	2.92742190321	971.904071867	16.1984011978	1147.5493861
	358.20255319149					
<b>NOTE:</b> Also, there is currently an error in footnote 103 of page 190 of the preamble: the estimates there are based on trade associations filing, instead of the law/consultant firms filing all the reports, including the seminar reports.						



**Reporting and Recordkeeping Burden Hours and Costs for Persader Reporting**

Form		Number of Reports	Reporting Minutes Per Respondent	Recordkeeping Minutes Per Respondent	Total Burden Minutes Per Respondent
<b>Form LM-20</b>					
Cost Per Form		4194.44	83.00	15.00	98.00
Cost Per Filer		11.70968761			
<b>Form LM-10</b>		2777.04	122	25.00	147.00
Annual Cost per Non-Filing Entity:	\$92.53				
Total Annual Cost for Non-Filing Entities:	\$3,636,320.73				
<p>*Form LM-20 average hourly salary for lawyers, \$64.17, is derived from the Occupational Employment and Wages Survey for May 2014, Table 1 on page 12, from the Bureau of Labor Statistics (BLS) at <a href="http://www.bls.gov/news.release/pdf/ocwage.pdf">http://www.bls.gov/news.release/pdf/ocwage.pdf</a>. The Department increased these figures by approximately 44.2.0% to account for total compensation to reach the average hourly compensation for attorneys for the purposes of this analysis: \$92.53. See Employer Costs for Employee Compensation Summary (03-11-15), from the BLS, at <a href="http://www.bls.gov/news.release/ecec.nr0.htm">http://www.bls.gov/news.release/ecec.nr0.htm</a>. The Department increased the average hourly wage rate for employees (\$21.72 in 2012) by the percentage total of the average hourly compensation figure (\$9.60 in 2012) over the average hourly wage.</p>					

Average Cost Per Respondent*	Total Cost	Increase Over Recent ICR Submission	Total Increase Over Recent ICR Submission	Increase Over NPRM	Total Increase Over NPRM
\$151.14	\$633,932.16	\$3.36	\$576,743.16	\$63.55	\$406,110.57
	\$1,769.76				
\$226.70	\$629,567.34	\$4.59	\$417,003.34	\$51.52	\$31,502.82
<b>Total Cost of Rule for Filers:</b>	\$1,263,499.50		\$993,746.50		\$437,613.39
			\$269,753.00		\$825,886.11
<b>Total Cost of Rule:</b>	\$4,899,820.23				

Summary of Form Persuader Regulatory Flexibility Analysis								
For Consultants that Meet the SBA Small Entities Standard							Total Cost per Response	Total Cost Per LM-20 Respondent
<b>Year Cost of Form LM-20 Report</b>								
Payroll Cost For Avg Consultant Firm					\$1,444,486		\$151.14	\$1,769.76
Percent of Average Annual Payroll							0.01046%	0.1225182%
Payroll Cost For Consulting Firm with 0-4 Employees					\$92,126.18		\$151.14	\$1,769.76
Percent of Average Annual Payroll							0.16%	1.9210163%
<b>Non-Filers*</b>								
For Non-Filing Firms with Avg. Consultant Firm							\$92.53	
Percent of Average Annual Payroll							0.0064%	
For Non-Filing Firms with Avg. Consultant Firm with 0-4 Employees							\$92.53	
							0.10%	
<b>Year Cost of Form LM-10</b>								
Payroll Cost for All Employers					\$945,530		\$226.70	
Percent of Average Annual Payroll							0.0240%	0.000239764424
Payroll Cost for All Employers with 1-4 Employees					\$67,126.88		\$226.70	
Percent of Average Annual Payroll							0.34%	
For Non-Filing Employers (10 minutes per year)							15.4220718232	
Percent of Annual Payroll							0.00326%	
Percent of Payroll for Employers with 1-4 Employees							15.4220718232	
							0.02297%	
<b>Number of Small Entities</b>								
					Filing Entities	Non-Filing Entities*		
<b>Form LM-20</b>					354.620528	39297.79745		
<b>Form LM-10</b>					2768.70888			
<b>Total</b>					3123.32941			
* The total cost for these non-filing entities is:					3636320.73			

Davis, Andrew - OLMS:  
The source for all the NAICS data is the U.S. Census Bureau, Statistics of U.S. Businesses: 2012: Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States, All Industries: 2012, released on 1/23/15, located at <http://www.census.gov/econ/susb/>. Saved as a spreadsheet on the Y Drive.

