# SUPPORTING STATEMENT FOR THE PAPERWORK REDUCTION ACT SUBMISSION FOR FORM ID

#### A. JUSTIFICATION

# 1. Circumstances Making the Collection of Information Necessary

Regulation S-T (17 CFR Part 232) provides the general requirements and procedures for electronic filings made through the EDGAR system. It further mandates that all domestic registrants, foreign private issuers and foreign governments file their securities documents electronically with the Commission. This includes registration statements under the Securities Act of 1933 and registration statements, reports and other documents under the Securities Exchange Act of 1934. To facilitate the filing requirements, the Commission developed certain procedures and forms that were unique to the EDGAR filing system, including Forms ID to be used by EDGAR filers.

## 2. Information Collection Purpose and Use

The information provided on Form ID allows the Commission to assign company identification numbers ("CIKs") and passwords to registrants and others, providing access to the EDGAR system.

These are essential to the security of the EDGAR system.

# 3. Information Technology Consideration

The forms are used to implement improved information dissemination technology. The EDGAR system is designed to reduce the regulatory burdens of paper filings with the Commission. Form ID is filed electronically using the EDGAR system using the following

URL- Link to Form ID

## 4. Duplication

EDGAR system function is unique to the Commission; consequently, no duplication of the forms exists.

#### 5. Burden on Small Entities

The Electronic Data Gathering, Analysis and Retrieval System (EDGAR) has been designed to accommodate small entities to the greatest degree possible while still providing for the public electronic dissemination of information.

#### 6. Consequences of Not Conducting Collection

Form ID must be used every time a registrant or other person obtains or changes an identification number.

# 7. Special Circumstances

Not applicable.

## 8. Consultations Outside the Agency

Form ID was proposed for public comment. No comments were received on this requests during the 60-day comment period prior to OMB's approval.

# 9. Payment or Gift to Respondent

Not applicable.

## 10. Confidentiality

Form ID is used solely for registering filers on the EDGAR system.

# 11. Sensitive Questions

No information of a sensitive nature is required under this collection of information. The information collection collects basic Personally Identifiable Information (PII) that may include name, business address, and residential address (for sole proprietor only), telephone/cellular/facsimile number, email address, and Tax ID Number (TIN).

The Systems of Records Notice may be found at the following link:

http://www.sec.gov/about/privacy/sorn/secsorn1.pdf. The Privacy Impact Assessment (PIA) for EDGAR is attached to this submission as a supplementary document.

# 12. Respondent Time Burden Estimate

We estimate that 36,590 registrants file Form ID and it takes an estimated 0.15 hours per response for a total annual burden of 5,489 hours. It is estimated that the company is responsible for 100% of the 5,489 burden hours. The estimated hours are made solely for the purposes of the Paperwork Reduction Act.

#### 13. Total Annualized Cost Burden Estimate

We estimate that the issuer is responsible for 100% of the total reporting burden imposed by the forms and there is no additional cost associated with the information collection.

#### 14. Federal Government Costs

The Commission has no specific information available concerning the cost for staff processing Form ID.

## 15. Change in Burden

The decrease of 4,379 annual burden hours is due to an adjustment to reflect a decrease in the number of respondents filing Form ID.

## 16. Information Collections Planned for Statistical Purposes

Not applicable.

## 17. Approval to Omit OMB Expiration Date

We request authorization to omit the expiration date on the electronic version of the form. Including the expiration date on the electronic version of the form will result in increased costs, because the need to make changes to the form may not follow the application's scheduled version release dates. The OMB control number will be displayed.

## 18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.

#### **B. STATISTICAL METHODS**

Not applicable.