

**SUPPORTING STATEMENT
ELECTRONIC OPERATIONS
OMB CONTROL NO. 1557-0301**

A. JUSTIFICATION

1. Circumstances and Need

Twelve CFR part 155 provides that Federal savings associations (FSAs) may use, or participate with others to use, electronic means or facilities to perform any function, or provide any product or service, as part of an authorized activity. Electronic means or facilities include, but are not limited to, automated teller machines, automated loan machines, personal computers, the Internet, the World Wide Web, telephones, and other similar electronic devices. The regulation requires each FSA to notify the OCC at least 30 days before establishing a transactional web site. A transactional web site is an Internet site that enables users to conduct financial transactions such as accessing an account, obtaining an account balance, transferring funds, processing bill payments, opening an account, applying for or obtaining a loan, or purchasing other authorized products or services. FSAs that present supervisory or compliance concerns may be subject to additional procedural requirements.

2. Use of Information Collected

This information collection facilitates the OCC's ability to identify industry technology trends and better understand emerging technologies. The information is collected on a transactional basis and is used to ensure that safety and soundness requirements are being met.

3. Use of Technology to Reduce Burden

Not applicable.

4. Efforts to Identify Duplication

The information collected is not available elsewhere.

5. Minimizing the Burden on Small Firms

The time required to complete the notice is not affected by the size or complexity of the institution.

6. Consequences of Less Frequent Collection

Absent the collection of information, safety and soundness standards may not be met.

7. Special Circumstances

This information collection is conducted in a manner that is consistent with the guidelines set forth in 5 CFR 1320.6.

8. Consultation with persons Outside OTS

Notice of the intent to renew this information collection was published in the Federal Register on July 28, 2014, 79 FR 42823. One comment was received.

One commenter asked whether the collection of information is necessary for the proper performance of the OCC's functions, including whether the information has practical utility.

The commenter described the collection as an "anachronism" that "no longer reflects the realities and risks of current times." The commenter further noted that the Internet has been widely used as a channel for offering and conducting banking services for many years and that the OCC likewise has many years of supervisory experience with "transactional web sites," which would seem to obviate the continued need for notice and collection of this information. Finally, the commenter stated that the information collection is not an effective way of understanding industry trends and emerging technologies, contending that FSAs as a group "tend to be slow adopters of new technology" and noting that national banks are not subject to a similar requirement.

The OCC appreciates the commenter's perspective. In response, the OCC will give careful consideration to the comment in connection with the OCC's national bank and FSA rule integration efforts, in particular whether a notice requirement is still necessary for transactional web sites.

9. Payment of Respondents

No payments or gifts are made in connection with this information collection.

10. Confidentiality

The information collected is kept confidential to the extent permitted by law.

11. Information of a Sensitive Nature

Not applicable. No personally identifiable information is collected.

12. Annual Hour Burden Estimate

Estimated number of respondents: 15.

Estimated burden hours per response: 2.

Total Estimated Burden: 30 hours.

Cost of Hour Burden:

$30 \times \$ 92 = \$ 2,760.$

To estimate compensation costs associated with the collection, we used \$92 per hour, which is based on May 2012 Bureau of Labor Statistics wage data for the average of the 90th percentile for seven occupations (i.e., accountants and auditors, compliance officers, financial analysts, lawyers, management occupations, software developers, and statisticians) plus an additional 33 percent to cover adjustments and private sector benefits. According to Bureau of Labor Statistics employer costs of employee benefits data, thirty percent represents the average private sector costs of employee benefits.

13. Total Annual Cost Estimate

There are no start-up costs.

14. Annualized Cost to Government

Not applicable.

15. Reason for Change in Burden

Current Burden: 18 hours.

Revised Burden: 30 hours.

Difference: +12 hours.

The increase in burden is due to the availability of more accurate burden estimates.

16. Publication

Not applicable.

17. Expiration Date

Not applicable.

18. Exceptions

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.