

Number of LM-20 Reports									
				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
Total:	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						
Total of LM-20 Filers			Reports Per Filer						
Sub-total for number of law/consultant firms:			Sub-total for number of reports per filer						
	358.202553191489		11.7096876128566						
Total Form LM-10 Reports/Filers Total:	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				
Non-Filing Entities	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)
Form LM-20 (Revised Forms Submitted)	4194.44	62916.6	1048.61	348138.52	5802.30866667	411055.12
Form LM-10 (Revised Form Filers/Forms Submitted)	2777.04	69426	1157.1	338798.88	5646.648	408224.88
Total of Form LM-20 Filers						
Sub-total for number of law firms/consultants:	11.70968761	175.645314193	2.92742190321	971.904071867	16.1984011978	1147.5493861
	358.20255319149					
NOTE: 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
Form LM-20					
Cost Per Form		4194.44	83.00	15.00	98.00
Cost Per Filer		11.70968761			
Form LM-10		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 http://www.bls.gov/news.release/pdf/ocwage.pdf. 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 http://www.bls.gov/news.release/ecec.nr0.htm. 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
Total Cost of Rule for Filers:	\$1,263,499.50		\$993,746.50		\$437,613.39
			\$269,753.00		\$825,886.11
Total Cost of Rule:	\$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		
Year Cost of Form LM-20 Report								
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%	
Non-Filers*								
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%		
Year Cost of Form LM-10								
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%		
Number of Small Entities			Filing Entities	Non-Filing Entities*				
Form LM-20			354.620528	39297.79745				
Form LM-10			2768.70888					
Total			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.

Data (source is hyperlinked)	Totals	2009	2010	2011	2012	2013	2014
Employer Costs for Employee Compensation Summary							
Average benefit cost							9.6
Average hourly wage							21.72
Fringe benefit percentage (page 189 of final rule)							44.2%
Hourly costs for attorneys							\$ 64.17
Loaded hourly cost (hourly wage plus fringes)							\$92.53
LM-10 reports registered (from OLMS annual report on OLMS web site)			1,000	956	920	934	970
Persuader LM-10 Reports FY 10-14 (from DRDA/Patrick Hyde: see Y Drive)			251	246	236	309	375
Average LM-10 Reports Registered from FY10-14	956						
Average Persuader LM-10 Reports from FY10-14	283.4						
Average Non-Persuader LM-Reports from FY10-14	672.6						
LM-20 reports registered (from OLMS annual report on OLMS web site)	2,726		446	452	617	571	640
LM-20 filers (from OLMS e.LORS data)	464		74	88	99	93	110
Average Number of LM-20s Registered for FY 10-14:	5.875						
	545						
Average Number of LM-20 Filers for FY 10-14:							
	93						
Average Number of LM-20 Reports/Filer for FY 10-14:							
	5.875						
NLRB Representation and Decert Elections (2009-13)							
2009 - 2013 Annual Average NLRB	2,658	2,696	2,969	2,634	2,484	2,507	
National Mediation Board representation cases filed			46	40	41	34	39
2010 - 2014 Annual average NMB	40						

Average Employer Utilization Rate of Consultants:

0.78 71 75 75 82 87