

Type of respondent	Applicable CFTC Regulation Section (17 CFR)	Total Number of Respondents (13(a))	Average Reports Annually by Each Respondent	PR Total Annual Responses (13(b))
Rule	150.4(b)(2)	100	2	200
		25	1	25
	150.4(b)(5)	75	1	75
	150.4(b)(8)	40	1	40
TOTAL		240		340

Assumptions

Labor Costs				
Category	Average Wage (per hour)	Average Wage (per hour, inflation-adjusted)	Average Wage (per hour, inflation-adjusted, including other benefits and overhead, rounded)	Weight
Blended	\$76.54	\$78.99	\$160.00	100.00%
Avg. of senior and non-senior programmer	\$56.64			15.00%
Compliance manager	\$58.57			30.00%
Assistant/ associate general counsel	\$111.40			40.00%
Senior Accountant	\$39.44			15.00%

36 \$5,760

PR Estimated Number of Hours Per Response	PR Total Annual Hours Requested (13(c))	PR Average Annualized Labor Costs per Response	PR Total Annualized Labor Costs
20	4000	\$3,200	\$640,000
20	500	\$3,200	\$80,000
10	750	\$1,600	\$120,000
40	1600	\$6,400	\$256,000
90	6850	\$14,400	\$1,096,000

Hours Worked	Annual Total Compensation	Categories (from 2013 SIFMA Report on Management & Professional Earnings in the Securities	Inflation Adjustment	April 2013 CPI
1800			3.20%	231.485
1800	\$101,950	Avg. of senior and non-senior programmer		
1800	\$105,427	Compliance manager		
1800	\$200,524	Assistant/ associate general counsel		
1800	\$70,989	Senior Accountant		

April 2016 CPI	Other Benefits and Overhead Adjustment Factor (1.33*1.50)
238.890	99.50%