

SUPPORTING STATEMENT
CUSTOMER ASSISTANCE
(OMB Control No. 3064-0134)

INTRODUCTION

The Federal Deposit Insurance Corporation (FDIC) is requesting a three-year renewal of the information collection for its collection (3064-0134) associated with Customer Assistance which permits the FDIC to collect information from customers of financial institutions who have inquiries or complaints about an institution. Customers may document their complaints or inquiries to the FDIC using a letter or an optional Customer Assistance Form (6422/04), or an optional Business Assistance Form (6422/11). For questions on FDIC deposit insurance coverage, customers or bankers at an institution may document their inquiry using the FDIC Deposit Insurance Form (6422/15). The forms allow for online completion and submission on the FDIC's website, although it can still be completed in hard copy and mailed to the FDIC for those who prefer to do so. The current clearance for the collection expires on September 30, 2018. There is no change in the method or substance of the collection.

A. JUSTIFICATION

1. Circumstances and Need

Consumers and bankers who wish to submit their complaints or inquiries to FDIC must do so in writing. The optional online customer assistance forms permit the FDIC to respond to consumers or businesses in an expeditious fashion.

Submitting the form directly online will make the data submitted much more accurate.

2. Use of Information Collected

The information would be used to improve the way FDIC relates to consumers and businesses requesting assistance in resolving their complaint or inquiry. The FDIC would use the information provided on the form to review the information to provide a response to provide to the requestor, determine the nature of the complaint and inquiry, and what financial institution, if any, is involved.

3. Use of Technology to Reduce Burden

The Customer Assistance Form, the Business Assistance Form, and the FDIC Deposit Insurance Form are available for the general public to submit a complaint or inquiry online through use of an interactive form.

4. Efforts to Identify Duplication

There is no duplication of reporting. The Customer Assistance Form, the Business Assistance Form, and the FDIC Deposit Insurance Form will allow consumers or businesses another venue, other than by telephone or writing, to submit a complaint or inquiry.

5. Minimize the Burden on Small Entities

As of December 2017 there were 3,643 FDIC-supervised entities, of which 2,924 were below the \$550 million threshold and therefore meet the Small Business Administration's definition of a "small entity." Since this information collection relates to the burden on the customer for submitting the forms directly to the FDIC, the number of small banking entities affected by this ICR is estimated to be zero.

6. Consequences of Less Frequent Collections

This capability is an optional method of submitting complaints and inquiries to the FDIC for consumers and businesses.

7. Special Circumstances

None.

8. Summary of Public Comments; Consultation

A notice seeking public comment for a 60-day period was published in the *Federal Register* on May 24, 2018 (83 FR 24116). No comments were received.

9. Payment or Gift to Respondents

None.

10. Confidentiality

No confidentiality issues anticipated. Any information deemed to be of a confidential nature would be exempt from public disclosure in accordance with the provisions of the Freedom of Information Act (5 U.S.C. 552).

11. Information of a Sensitive Nature

This collection contains no sensitive information.

12. Estimates of Annualized Burden

2018 Summary of Annual Burden and Internal Cost (3064-0134)							
	Type of Burden	Obligation to Respond	Estimated Number of Respondents	Estimated Frequency of Responses	Estimated Time per Response	Frequency of Response	Total Annual Estimated Burden
Customer Assistance Form (6422/04)	Reporting	Voluntary	7,000	1	0.25	On Occasion	1,750
Business Assistance Form (6422/11)	Reporting	Voluntary	200	1	0.25	On Occasion	50
FDIC Deposit Insurance Form (6422/15)	Reporting	Voluntary	1,000	1	0.25	On Occasion	250
TOTAL HOURLY BURDEN							2,050 hours
TOTAL INTERNAL COST	\$31.40	/HR					\$64,370

Annualized Cost of Internal Hourly Burden:
 2,050 hours x \$31.40 per hour¹ = \$64,370.

13. Capital, Start-Up, Operating and Maintenance Costs

None.

14. Annual Cost to the Federal Government

None.

15. Change in Burden

There is no change in the method or the substance of this information collection. The 1,700 decrease in burden hours is a result of economic fluctuation. In particular, the number of respondents has decreased while the hours per response have remained the same.

16. Publication

The information is not published.

17. Display of Expiration Date

¹ This represents the estimated total hourly compensation, adjusted for Benefits and Inflation and operating in the 75th percentile of Customer Service Representatives in the Depository Credit Intermediation sector as of December 2017. The estimate includes the May 2016 median hourly wage rate reported by the Bureau of Labor Statistics, National Industry-Specific Occupational Employment, and Wage Estimates. This wage rate has been adjusted for changes in the Consumer Price Index for all Urban Consumers between May 2016 and September 2017 (3.54 percent) and grossed up by 55.3 percent to account for non-monetary compensation as reported by the December 2017 Employer Costs for Employee Compensation Data.

Not applicable.

18. Exceptions to Certification Statement

None.

B. STATISTICAL METHODS

Not applicable.