

## SUPPORTING STATEMENT 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 Electronic Data Gathering, Analysis and Retrieval System (“EDGAR”). 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 are unique to EDGAR, including Form ID, to be used by EDGAR filers.

#### 2. Purpose and Use of the Information Collection

The information provided on Form ID allows the Commission to assign Central Index Keys, access codes, and passwords to registrants and others (“filers”), which permit filing on EDGAR. These are an essential part of the security of EDGAR.

#### 3. Consideration Given to Information Technology

The form must be submitted to enable filers to use EDGAR. EDGAR is used to implement improved information dissemination technology. EDGAR is also designed to reduce the regulatory burdens of paper filings with the Commission.

#### 4. Duplication of Information

EDGAR is unique to the Commission; consequently, no duplication of the form exists.

#### 5. Reducing the Burden on Small Entities

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 by filers to obtain access codes to permit filing on EDGAR.

7. Special Circumstances

Not applicable.

8. Consultations with Persons Outside the Agency

No comments were received on this request 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, including social security numbers, will be required under this collection of information. The information collection on Form ID collects basic Personally Identifiable Information (PII) that may include name, address, phone number, zip code, occupation, job title, work phone, and work email. However, the agency has determined that the information collection on the Form ID does not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier. In accordance with Section 208 of the E-Government Act of 2002, the agency has conducted a Privacy Impact Assessment (PIA) of the EDGAR system, in connection with this collection of information. The EDGAR PIA, published on January 29, 2016, is provided as a supplemental document and is also available at <https://www.sec.gov/privacy>.

12. Estimate of Respondent Reporting Burden

We estimate that 46,842 filers file Form ID and that it takes 0.15 hours per response, for a total annual burden of 7,026 hours. It is estimated that the filers are responsible for 100% of the 7,026 burden hours. The estimated hours are made solely for the purposes of the Paperwork Reduction Act.

Form ID	Annual No. of Filings			Annual Time Burden (Hrs.)		
	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>
Form ID	38728	46842	8114	5809	7026	1217

13. Estimate of Total Annualized Cost Burden

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

14. Costs to Federal Government

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

15. Reason for Change in Burden

The increase from 5,809 to 7,026 annual burden hours is due to an adjustment to reflect an increase in the number of filers filing Form ID.

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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.