

SUPPORTING STATEMENT FOR RULES 7a-15 THROUGH 7a-37  
UNDER THE TRUST INDENTURE ACT

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Rules 7a-15 through 7a-37 under the Trust Indenture Act of 1939 (“TIA”) set forth requirements governing applications for exemption filed pursuant to Section 304(c) or 304(d) of the TIA, applications for qualification of indentures filed pursuant to Section 307 of the TIA, statements of eligibility and qualification of trustees filed pursuant to Section 305, 307 or 310(a) of the TIA, applications for the stay of the trustee’s duty to resign filed pursuant to Section 310(b) of the TIA, and reports filed pursuant to Section 314(a) of the TIA.

2. Purpose and Use of the Information Collection

Trust Indenture Act Rules 7a-15 through 7a-37 do not directly impose any information collection requirements. Rather, they set forth guidelines as to how to present information required by various TIA forms. The information required by the TIA forms is necessary to determine whether the requirements of the TIA are satisfied.

3. Consideration Given to Information Technology

The Commission collects information electronically through its Electronic Data Gathering, Analysis and Retrieval (EDGAR) system.

4. Duplication of Information

We are not aware of any rules that substantially duplicate, overlap, or conflict with Trust Indenture Act Rules 7a-15 through 7a-37.

5. Reducing the Burden on Small Entities

Rule 7a-15 through Rule 7a-37 have little impact on small entities since issuers who qualify as a “small business” or a “small organization” under the Securities Act and Exchange Act would rarely, if ever, issue debt securities that would be subject to the Trust Indenture Act.

6. Consequences of Not Conducting Collection

Trust Indenture Act Rules 7a-15 through 7a-37 are disclosure guidelines and do not directly result in any collection of information. The forms to which the rules relate (for which separate OMB submissions are made) are filed only once and fewer collections would not satisfy statutory mandates.

7. Special Circumstances

There are no special circumstances.

8. Consultations with Persons Outside the Agency

No comments were received during the 60-day comment period prior to OMB's review of this submission.

9. Payment or Gift to Respondents

No payment or gift to respondents.

10. Confidentiality

All documents filed with the Commission are public documents.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this collection of information. The information collection does not collect personally identifiable information (PII). The agency has determined that a system of records notice (SORN) and privacy impact assessment (PIA) are not required in connection with the collection of information.

12. Estimate of Respondent Reporting Burden

Trust Indenture Act Rules 7a-15 through 7a-37 are assigned one burden hour for administrative convenience because the rules set forth guidelines on the presentation of information that must appear in other filings under the Trust Indenture Act.

13. Estimate of Total Annualized Cost Burden

Trust Indenture Act Rules 7a-15 through 7a-37 do not directly impose any costs on respondents.

14. Costs to Federal Government

There is no cost to Federal Government.

15. Reason for Change in Burden

There is no change in burden.

16. Information Collection Planned for Statistical Purposes

The information collection does not employ statistical methods.

17. Approval to Omit OMB Expiration Date

The Commission is not seeking approval to omit the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for Paperwork Reduction Act submissions.

B. STATISTICAL METHODS

The information collection does not employ statistical methods.