

SUPPORTING STATEMENT FOR FORM ID
3235-0328

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 federal 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 filings with the Commission in accord with the federal securities laws, the Commission developed procedures and forms unique to EDGAR, including the Form ID application for EDGAR access. The Commission may consider, among other things, amendments to Form ID that would result in a more uniform and secure process for EDGAR access by requiring certain applicants that already have an EDGAR identification number, but do not have EDGAR access codes, to submit the Form ID to obtain access to EDGAR.

2. Purpose and Use of the Information Collection

The information provided on Form ID allows the Commission staff to review applications for EDGAR access and, if the application is approved, assign identification numbers (if the applicant does not already have an identification number) and access codes to applicants to permit filing on EDGAR. Form ID is essential to EDGAR security.

3. Consideration Given to Information Technology

Form ID must be submitted, reviewed, and approved before filers may use EDGAR. The Commission consistently improves EDGAR information technology to facilitate the utility of EDGAR for filers, Commission staff, and the public. Further, EDGAR exists 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 submitted in order for filers to use EDGAR.

7. Special Circumstances

Not applicable.

8. Consultations with Persons Outside the Agency

The Commission has solicited comments from the public on the collection of information burdens. The Commission will receive and evaluate public comments, if any, during the comment period prior to OMB's approval.

9. Payment or Gift to Respondent

Not applicable.

10. Confidentiality

Form ID is used solely for reviewing applications for EDGAR access and permitting access to EDGAR.

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, and email address. 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 EDGAR, in connection with this collection of information. The EDGAR PIA, published on February 5, 2020, is provided as a supplemental document and is also available at <https://www.sec.gov/about/privacy/pia/pia-edgar.pdf>.

12. Estimate of Respondent Reporting Burden

We estimate that there are 48,493 filings annually of the Form ID and that it takes 0.15 hours per response, for a total annual burden of 7,274 hours.¹ The

¹ The Commission recently made amendments to Volume I of the EDGAR Filer Manual and 17 CFR 232.10(b) to allow applicants for EDGAR access to use electronic notarizations and remote online notarizations, which include electronic signatures, in addition to notarizations that include manual signatures. These methods of notarization provide an efficient means of authenticating signatures in connection with requests for EDGAR access. *See*

estimate includes the number of Form ID filings for filers without identification numbers (approximately 48,089 filings) and filers with identification numbers that seek to obtain access codes for purposes of submitting electronic filings on EDGAR (approximately 404 filings). It is estimated that the filers are responsible for 100% of the 7,274 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	46,842	48,493	1,651	7,026	7,274	248

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 Commission may consider, among other things, amendments to Form ID that would result in a more uniform and secure process for EDGAR access by requiring certain applicants that already have an EDGAR identification number, but do not have EDGAR access codes, to submit the Form ID to obtain access to EDGAR. If the amendments are adopted, the estimated total number of annual Form ID filings for filers with EDGAR identification numbers that need to obtain access codes is approximately 404 filings. Additionally, we would update the current estimate of the number of Form ID filings for new filers without identification numbers by approximately 1,247 filings. These changes would result in an increase of 1,651 filings and 248 annual burden hours. The total estimate of 48,493 filings and 7,274 annual burden hours incorporates the filings made by filers without identification numbers and filers with identification numbers that seek to obtain access codes for purposes of submitting electronic filings on EDGAR.

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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.