

## **SUPPORTING STATEMENT FOR PROPOSED AMENDMENTS TO MODERNIZE FILING FEE DISCLOSURE AND PAYMENT METHODS**

This supporting statement is part of a submission under the Paperwork Reduction Act of 1995 (“PRA”), 44 U.S.C. §3501, *et seq.*

### **A. JUSTIFICATION**

#### **1. CIRCUMSTANCES MAKING THE COLLECTION OF INFORMATION NECESSARY**

In Release No. 33-10720,<sup>1</sup> the Commission proposed amendments to modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format<sup>2</sup> using Inline eXtensible Business Reporting Language (“XBRL”).<sup>3</sup> The proposed amendments also would add the option for fee payment via Automated Clearing House (“ACH”) and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions.

The proposed amendments affect “collection of information” requirements within the meaning of the PRA.<sup>4</sup> The titles of the collections of information impacted by the amendments are:<sup>5</sup>

- “Form S-1” (OMB Control No. 3235-0065);
- “Form S-3” (OMB Control No. 3235-0073);
- “Form S-4” (OMB Control No. 3235-0324);

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<sup>1</sup> Release No. 33-10720 (Oct. 24, 2019) [84 FR 71580 (Dec. 27, 2019)] (“Proposing Release”), a copy of which is attached.

<sup>2</sup> Structured data is data that is tagged to make it machine-readable, facilitating its use by investors and other market participants, such as data aggregators (*i.e.*, entities that, in general, collect, package, and resell data).

<sup>3</sup> Inline XBRL allows filers to embed XBRL data directly into a HyperText Markup Language (“HTML”) document, eliminating the need to tag a copy of the information in a separate XBRL exhibit.

<sup>4</sup> This supporting statement relates only to the amendments that would affect operating companies. A separate supporting statement will be submitted for the amendments that would affect other entities.

<sup>5</sup> The proposed amendments would affect Regulation S-K, Regulation C, and Regulation S-T, but the paperwork burdens for these regulations are imposed through the forms that are subject to the requirements in the regulations and are reflected in the analysis of those forms. After the Proposing Release was issued by the Commission, OMB discontinued the OMB Control Numbers for these regulations so that the PRA inventory would not reflect duplicative burdens.

- “Form S-8” (OMB Control No. 3235-0066);
- “Form S-11” (OMB Control No. 3235-0067);
- “Form F-1” (OMB Control No. 3235-0258);
- “Form F-3” (OMB Control No. 3235-0256);
- “Form F-4” (OMB Control No. 3235-0325);
- “Form F-10” (OMB Control No. 3235-0380);
- “Schedule 13E-3” (OMB Control No. 3235-0007);
- “Schedule 13E-4F” (OMB Control No. 3235-0375);
- “Schedule 14A” (OMB Control No. 3235-0059);
- “Schedule 14C” (OMB Control No. 3235-0057);
- “Schedule TO” (OMB Control No. 3235-0515);
- “Schedule 14D-1F” (OMB Control No. 3235-0376); and
- “Rule 13e-1” (OMB Control No. 3235-0305).

## **2. PURPOSE AND USE OF THE INFORMATION COLLECTION**

The regulations, forms, schedules and rule listed above, which were adopted under the Securities Act or the Exchange Act, set forth the disclosure requirements for these fee-bearing documents.

The purpose of the proposed amendments is to improve filing fee preparation and payment processing by facilitating both enhanced validation through fee structuring and lower-cost, easily routable payments through the ACH payment option.

## **3. CONSIDERATION GIVEN TO INFORMATION TECHNOLOGY**

The collection of information requirements of the proposed amendments would be set forth in Regulations S-T and C and the respective forms, schedules and rule. The information required by these provisions would continue to be filed electronically with the Commission using the Commission’s Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system.

#### **4. DUPLICATION OF INFORMATION**

The proposed amendments would require fee-related information to be presented in both traditional human-readable (*i.e.*, HTML) and structured format. When the information is solely in traditional format, it cannot be used as effectively as when also in a structured format that a variety of software applications can recognize and process, enabling efficient automated access to, and processing of, information relevant to fee calculation.

#### **5. REDUCING THE BURDEN ON SMALL ENTITIES**

The proposed amendments would affect some companies that are small entities. The Commission performed an Initial Regulatory Flexibility Act Analysis and estimated that there are approximately 1,171 issuers that file with the Commission, other than investment companies, that may be considered small entities and are potentially subject to the proposed amendments.

Although the proposed amendments would have an impact on a substantial number of small entities, the Commission expects that the impact on entities affected by the proposed amendments would not be significant. Some of the proposed amendments, like those that would require the structuring of filing fee disclosures and related information, would increase compliance costs for registrants, but are expected to have a small incremental effect on existing burdens for all issuers, including small entities.

The Commission believes the proposed amendments would clarify, consolidate and simplify compliance and reporting requirements for small entities and other registrants. The proposed amendments would modernize and streamline the filing fee payment process and filing fee disclosures by requiring more complete disclosure of filing fee-related information and requiring the filing fee information to be presented in a structured format. The proposed amendments should make it easier to validate filing fee calculations and payments made by small entities and other registrants. The Commission is proposing a transition period for the fee-related information structuring requirements under the proposed amendments for all registrants. Small entities would be in the last group phased in under the proposed transition and this transition would occur after they already have experience with the financial statement and cover page Inline XBRL structuring requirements. Accordingly, the Commission does not believe it is necessary to establish different compliance and reporting requirements or timetables for small entities, beyond their proposed transition period treatment, or to exempt small entities from all or part of the proposed amendments.

#### **6. CONSEQUENCES OF NOT CONDUCTING COLLECTION**

The regulations, forms, schedules and rule listed above set forth the disclosure requirements for fee-bearing documents filed to help investors make informed investment and voting decisions. Failure to conduct these collections of information would reduce the information available to investors to make these decisions. The proposed amendments are intended to improve filing fee preparation and payment processing by facilitating both enhanced validation through fee structuring and lower-cost, easily routable payments through the ACH payment option.

## **7. SPECIAL CIRCUMSTANCES**

There are no special circumstances in connection with these amendments.

## **8. CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY**

The Commission has issued a proposing release soliciting comment on the new “collection of information” requirements and the associated paperwork burdens. Comments on Commission releases are generally received from registrants, investors, and other market participants. In addition, the Commission and staff participate in ongoing dialogue with representatives of various market participants through public conferences, roundtables and meetings. All comments received on the proposal are available at <https://www.sec.gov/comments/s7-20-19/s72019.htm>. The Commission will consider all comments received prior to publishing the final rules as required by 5 CFR 1320.11(f).

## **9. PAYMENT OR GIFT TO RESPONDENTS**

No payment or gift has been provided to any respondents.

## **10. CONFIDENTIALITY**

All documents submitted to the Commission are available to the public.

## **11. SENSITIVE QUESTIONS**

No information of a sensitive nature, including social security numbers, will be required under the following collections of information in connection with the proposed amendments: Form S-1, Form S-3, Form S-4, Form S-8, Form S-11, Form F-1, Form F-3, Form F-4, Form F-10, Schedule 13E-3, Schedule 13E-4F, Schedule 14A, Schedule 14C, Schedule TO, Schedule 14D-1F, and Rule 13e-1. The information collections collect basic Personally Identifiable Information (“PII”) that may include a name and job title. However, the agency has determined that the information collections do not constitute a system of records 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 these collections 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/privacy>.

## **12./13. ESTIMATES OF HOUR AND COST BURDENS**

The paperwork burden estimates associated with the proposed rule amendments include the burdens attributable to collecting, preparing, reviewing, and retaining records. The Commission estimates that the proposed amendments would affect the collections of information listed above on a per form, schedule and rule basis as follows:

**PRA Table 1. Estimated Paperwork Burden Changes Due to the Proposed Amendments Per Form, Schedule, or Rule**

Proposed Amendments	Affected Forms, Schedules, and Documents	Estimated Burden Change
<b>Disclosure of Fee-Related Information:</b>		
<ul style="list-style-type: none"> <li>• Adding a new “fee rate” column to the fee table of Forms S-1, S-3, S-8, S-11, S-4, F-1, F-3, F-4, and F-10 under the Securities Act of 1933 and Schedules 13E-3, 13E-4F, 14A, 14C, TO, and 14D-1F under the Securities Exchange Act of 1934 (“collectively, the “Affected Securities Act and Exchange Act Forms and Schedules”).</li> <li>• Adding or revising instructions regarding presentation, calculations and related disclosure in general and, in particular, associated with Rule 415(a)(6), Rule 424(g), Rule 429, Rule 457(a), (b), (f), (h), (o), and (p) and Rule 0-11(a)(2), as applicable, in regard to the Affected Securities Act and Exchange Act Forms and Schedules.</li> <li>• Adding a new checkbox column to the fee table of the Affected Securities Act and Exchange Act Forms and Schedules to indicate whether the filer is relying on, as applicable, Securities Act of 1933 Rule 415(a)(6), Rule 429, or Rule 457(b), (o), or (p); or Securities Exchange Act of 1934 Rule 0-11(a)(2).</li> </ul>	<ul style="list-style-type: none"> <li>• Forms S-1, S-3, S-8, S-11, S-4, F-1, F-3, F-4, and F-10</li> <li>• Schedules 13E-3, 13E-4F, 14A, 14C, TO and 14D-1F</li> </ul>	<ul style="list-style-type: none"> <li>• 0.25 hour net increase in compliance burden</li> </ul>
<ul style="list-style-type: none"> <li>• Adding a fee table and related instructions to Rule 13e-1 to conform its requirements to those proposed for the Affected Securities Act and Exchange Act Forms to the extent applicable.</li> </ul>	<ul style="list-style-type: none"> <li>• Documents filed under Rule 13e-1</li> </ul>	<ul style="list-style-type: none"> <li>• 0.25 hour net increase in compliance burden</li> </ul>
<b>Structuring of Fee-Related Information:</b>		
<ul style="list-style-type: none"> <li>• Require structuring, in an Inline XBRL format, of all the fee-related information that would be required in the body of the Affected Securities Act and Exchange Act Forms and Schedules and documents filed under Rule 13e-1. The structured information would include each fee table in the Affected Securities Act and Exchange Act Forms and Schedules and documents filed under Rule 13e-1, together with a related explanatory section.</li> </ul>	<ul style="list-style-type: none"> <li>• Forms S-1, S-3, S-8, S-11, S-4, F-1, F-3, F-4, and F-10</li> <li>• Schedules 13E-3, 13E-4F, 14A, 14C, TO and 14D-1F</li> <li>• Documents filed under Rule 13e-1</li> </ul>	<ul style="list-style-type: none"> <li>• 1 hour net increase in compliance burden per form / schedule</li> </ul>

Below is the Commission’s estimate of the incremental change in internal burden and outside professional cost as a result of the proposed amendments. These estimates represent the average burden for all registrants, both large and small. In deriving these estimates, the Commission recognizes that the burdens will likely vary among individual registrants based on a number of factors, including the nature of their business. The Commission does not believe that the proposed amendments would change the frequency of responses to the existing collections of information; rather, it estimates that the proposed amendments would change only the burden per response.

The burden estimates were calculated by multiplying the estimated number of responses by the estimated average amount of time it would take a registrant to prepare and review the disclosures required under the proposed amendments. For purposes of the PRA, the burden is allocated between internal burden hours and outside professional costs. The table below sets forth the percentage estimates the Commission typically uses for the burden allocation for each form. The Commission also estimates that the average cost of retaining an outside professional is \$400 per hour.

**PRA Table 2. Standard Estimated Burden Allocation for Specified Forms and Schedules**

<b>Form / Schedule Type</b>	<b>Internal</b>	<b>Outside Professionals</b>
Schedules 14A and 14C	75%	25%
Forms S-1, S-3, S-11, S-4, F-1, F-3, F-4, F-10, N-2, N-5, and N-14. Schedule 13E-3. Rule 13e-1.	25%	75%
Form S-8 and Schedule TO	50%	50%
Schedules 13E-4F and 14D-1F	100%	

The table below illustrates the incremental change to the total annual compliance burden of affected forms, in hours and in costs, as a result of the proposed amendments.

**PRA Table 3. Calculation of the Incremental Change in Annual Burden Estimates of Affected Responses Resulting from the Proposed Amendments**

Form	Estimated Number of Affected Responses (A)	Estimated Incremental Burden Hours/Form (B)	Total Incremental Burden Hours (C) <sup>6</sup> = (A) x (B)	Estimated Internal Burden Hours (D) = (C) x (Allocation %)	Estimated Outside Professional Hours (E) = (C) x (Allocation %)	Estimated Outside Professional Costs/Affected Responses (F) = (E) x \$400
S-1	898	1.25	1,123	281	842	\$336,800
S-3	1,651	1.25	2,064	516	1,548	\$619,200
S-4	588	1.25	735	184	551	\$220,400
S-8	2,140	1.25	2,675	1,338	1,337	\$534,800
S-11	67	1.25	84	21	63	\$25,200
F-1	66	1.25	83	21	62	\$24,800
F-3	113	1.25	141	35	106	\$42,400
F-4	39	1.25	49	12	37	\$14,800
F-10	77	1.25	96	24	72	\$28,800
Sch. 14A	362	1.25	453	340	113	\$45,200
Sch. 14C	78	1.25	98	74	24	\$9,600
Sch. 13E-3	77	1.25	96	24	72	\$28,800
Sch. 13E-4F	3	1.25	4	4	0	0
Sch. TO	1,378	1.25	1,723	862	861	\$344,400
Sch. 14D-1F	2	1.25	3	3	0	0
Rule 13e-1	10	1.25	13	3	10	\$4,000
Totals	7,549		9,441	3,742	5,699	\$2,279,200

The following table summarizes the requested paperwork burden, including the estimated total reporting burdens and costs, under the proposed amendments.

<sup>6</sup> The estimates in Columns (C), (D) and (E) are rounded to a whole number.

**PRA Table 4. Requested Paperwork Burden under the Proposed Amendments**

Form/Collection	Current Burden			Program Change			Requested Change in Burden		
	Current Annual Responses (A)	Current Burden Hours (B)	Current Cost Burden (C)	Number of Affected Responses or New Responses (D)	Increase in Company Hours (E) <sup>1</sup>	Increase in Professional Costs (F) <sup>2</sup>	Annual Responses (G) = (A)	Burden Hours (H) = (B) + (E)	Cost Burden (I) = (C) + (F)
S-1	898	146,062	\$178,916,043	898	281	\$336,800	898	146,343	\$179,252,843
S-3	1,651	192,530	\$234,859,580	1,651	516	\$619,200	1,651	193,046	\$235,478,780
S-4	588	562,362	\$677,255,579	588	184	\$220,400	588	562,546	\$677,475,979
S-8	2,140	28,890	\$11,556,000	2,140	1,338	\$534,800	2,140	30,228	\$12,090,800
S-11	67	12,229	\$14,943,768	67	21	\$25,200	67	12,250	\$14,968,968
F-1	66	26,707	\$32,293,375	66	21	\$24,800	66	26,728	\$32,318,175
F-3	113	4,459	\$5,724,600	113	35	\$42,400	113	4,494	\$5,767,000
F-4	39	14,049	\$17,073,825	39	12	\$14,800	39	14,061	\$17,088,625
F-10	77	558	\$669,900	77	24	\$28,800	77	582	\$698,700
Sch. 14A	6,369	777,590	\$103,678,712	362	340	\$45,200	6,369	777,930	\$103,723,912
Sch. 14C	569	56,356	\$7,514,944	78	74	\$9,600	569	56,430	\$7,524,544
Sch. 13E-3	77	2,646	\$3,174,248	77	24	\$28,800	77	2,670	\$3,203,048
Sch. 13E-4F	3	6	0	3	4	0	3	10	0
Sch. TO	1,378	29,972	\$11,988,600	1,378	862	\$344,400	1,378	30,834	\$12,333,000
Sch. 14D-1F	2	4	0	2	3	0	2	7	0
Rule 13e-1	10	25	\$30,000	10	3	\$4,000	10	28	\$34,000

<sup>1</sup> From Column (D) in PRA Table 3.

<sup>2</sup> From Column (F) in PRA Table 3.

## 14. COSTS TO FEDERAL GOVERNMENT

The annual cost of reviewing and processing disclosure documents, including registration statements, post-effective amendments, proxy statements, annual reports and other filings of operating companies amounted to \$119,447,840 million in fiscal year 2020, based on the Commission's computation of the value of staff time devoted to this activity and related overhead.

## **15. REASON FOR CHANGE IN BURDEN**

The proposed rule amendments would modernize filing fee disclosure and payment methods. They would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information.

As explained above, the proposed rule amendments are expected to increase the compliance burden for each affected form, schedule, or rule by increasing both the internal company hours and external professional costs required to collect, prepare, review, and retain records in connection with the forms, schedules and rule. The Commission estimates for PRA purposes that the proposed amendments would result in a total increase in company hours of 3,742 hours and a total increase in professional costs of \$2,279,200. The Commission does not expect that the proposed amendments would change the number of annual responses filed for each form, schedule or rule.

## **16. INFORMATION COLLECTION PLANNED FOR STATISTICAL PURPOSES**

The information collections do not employ statistical methods.

## **17. APPROVAL TO OMIT OMB EXPIRATION DATE**

The Commission requests authorization to omit the expiration date on the electronic version of the forms and schedules. Including the expiration date on the electronic version of the forms and schedules will result in increased costs, because the need to make changes to the forms and schedules 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**

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

## **B. STATISTICAL METHODS**

The information collections do not employ statistical methods.

### **Form S-1 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form S-1, the proposed amendments would result in an increase of 281 burden hours and an increase in the cost burden of \$336,800 for the services of outside professionals.

### **Form S-3 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form S-3, the proposed amendments would result in an increase of 516 burden hours and an increase in the cost burden of \$619,200 for the services of outside professionals.

### **Form S-4 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form S-4, the proposed amendments would result in an increase of 184 burden hours and an increase in the cost burden of \$220,400 for the services of outside professionals.

### **Form S-8 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form S-8, the proposed amendments would result in an increase of 1,338 burden hours and an increase in the cost burden of \$534,800 for the services of outside professionals.

### **Form S-11 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form S-11, the proposed amendments would result in an increase of 21 burden hours and an increase in the cost burden of \$25,200 for the services of outside professionals.

### **Form F-1 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form F-1, the proposed amendments would result in an increase of 21 burden hours and an increase in the cost burden of \$24,800 for the services of outside professionals.

### **Form F-3 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form F-3, the proposed amendments would result in an increase of 35 burden hours and an increase in the cost burden of \$42,400 for the services of outside professionals.

### **Form F-4 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form F-4, the proposed amendments would result in an increase of 12 burden hours and an increase in the cost burden of \$14,800 for the services of outside professionals.

### **Form F-10 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Form F-10, the proposed amendments would result in an increase of 24 burden hours and an increase in the cost burden of \$28,800 for the services of outside professionals.

### **Schedule 14A Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule 14A, the proposed amendments would result in an increase of 340 burden hours and an increase in the cost burden of \$45,200 for the services of outside professionals.

### **Schedule 14C Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule 14C, the proposed amendments would result in an increase of 74 burden hours and an increase in the cost burden of \$9,600 for the services of outside professionals.

### **Schedule 13E-3 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule 13E-3, the proposed amendments would result in an increase of 24 burden hours and an increase in the cost burden of \$28,800 for the services of outside professionals.

### **Schedule 13E-4F Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule 13E-4F, the proposed amendments would result in an increase of 4 burden hours and no increase in the cost burden for the services of outside professionals.

### **Schedule TO Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule TO, the proposed amendments would result in an increase of 862 burden hours and an increase in the cost burden of \$344,400 for the services of outside professionals.

### **Schedule 14D-1F Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Schedule 14D-1F, the proposed amendments would result in an increase of 3 burden hours and no increase in the cost burden for the services of outside professionals.

### **Rule 13e-1 Short Statement**

The proposed rule amendments would modernize filing fee disclosure and payment methods. The proposed amendments would revise most fee-bearing forms, schedules, statements, and related rules to require each fee table and accompanying disclosure to include all required information for fee calculation in a structured format using Inline XBRL. The proposed amendments also would add the option for fee payment via ACH and eliminate the option for fee payment via paper checks and money orders. Finally, the proposed amendments also would make other fee-related revisions. The Commission anticipates that the amendments would, in the aggregate, increase the burdens and costs on affected entities due to changes in fee calculation disclosure requirements and the new requirement to structure fee-related information. For purposes of the PRA, the Commission estimates that, for Rule 13e-1, the proposed amendments would result in an increase of 3 burden hours and an increase in the cost burden of \$4,000 for the services of outside professionals.