

SUPPORTING STATEMENT
FOR THE PAPERWORK REDUCTION ACT INFORMATION COLLECTION
SUBMISSION FOR FORM 18

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Commission has exercised its authority under Sections 12(b) and 12(c) of the Securities Exchange Act of 1934 to establish Form 18, a registration statement that can be used by a foreign government or political subdivision to list securities on a U.S. exchange. Form 18 elicits the disclosure of material information concerning, among other things, a description of the securities being listed, external and internal debt, receipts and expenditures, foreign exchange reserves, imports and exports, and balance of payments. A copy of the issuer's latest annual budget is required to be filed as well

2. Purpose and Use of the Information Collection

The principal function of Commission forms and rules under the securities laws disclosure provisions is to make information required to be filed with the Commission permits verification of compliance with securities law requirements and assures the public availability and dissemination of such information. Private contractors reproduce much of the filed information, and provide it to private parties; and many other persons obtain information directly from the Commission's public files. Thus, information on Form 18 can be, and is, used by security holders, investors, brokers, dealers, investment banking firms and others. In addition, all investors benefit indirectly from submissions on Form 18, as direct users effect transactions in securities on the basis of current information about the issuer's business and operations included in such filings, thereby causing the market prices of the securities to reflect such information.

3. Consideration Given to Information Technology

Form 18 is filed electronically on the Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system.

4. Duplication of Information

Form 18 permits foreign government issuers to avoid unnecessary duplication and relies on foreign disclosure laws by allowing incorporation by reference to their annual budgets. Annual budgets, for several reasons are not substitutes for Form 18. First, the annual budgets, unlike filings on Form 18, are not deemed to be filed with the Commission for purposes of liability for misleading statements under Section 18 of the Exchange Act. Second, annual budgets may not be available to all persons in the U.S. potentially interested in purchasing securities of the issuer. Third, annual budgets serve

different purposes from Form 18 and thus contain information that is not necessarily meaningful for investor decisions in the secondary market. Finally, Form 18 is necessary to ensure the disclosure of certain key information.

5. Reducing the Burden on Small Entities

Small entities do not file Form 18.

6. Consequences of Not Conducting Collection

Form 18 is required to be filed once. Thereafter, Form 18-K is required to be filed on an annual basis after the completion of the issuer's fiscal year. Any less frequent filing would render performance comparisons meaningless, and deprive investors of the information protection of the Exchange Act.

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 has been provided to any respondents.

10. Confidentiality

Form 18 is a public document.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this collection of information. The information collection collects basic Personally Identifiable Information (PII) that may include name and job title. However, the agency has determined that the information collection 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 February 5, 2020, is provided as a supplemental document and is also available at <https://www.sec.gov/privacy>.

12. Estimate of Respondent Reporting Burden**Estimated Reporting Burden**

Information Collection Title	OMB Control Number	Number of Responses	Burden Hours
Form 18	3235-0121	5	40

Form 18 takes approximately 8 hours to prepare and is filed by approximately 5 respondents per year for annual reporting burden of 40 hours (8 hours x 5 responses). We derived our burden hour estimates by estimating the average number of hours it would take a foreign government or political subdivision to compile the necessary information and data, prepare and review disclosure, file documents and retain records. In connection with rule amendments to the form, we occasionally receive PRA estimates from public commenters about incremental burdens that are used in our burden estimates. We believe that the actual burdens will likely vary among foreign government or political subdivision issuers based on the size and complexity of the organization. We further estimate that the foreign government or political subdivision issuer would prepare 100% of Form 18 requirements. For administrative convenience, the paperwork burden hours has been rounded to the nearest whole number. The burden estimate for the hours is made solely for the purpose of the Paperwork Reduction Act.

13. Estimate of Total Annualized Cost Burden

There is no outside cost associated with this information collection.

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 approximately \$119,447,840 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

There is no change in burden.

16. Information Collection Planned for Statistical Purposes

The information collection is not planned for statistical purposes.

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

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

B. STATISTICAL METHODS

The information collection does not employ statistical methods.