

SUPPORTING STATEMENT
For the Paperwork Reduction Act Information Collection Submission for
RULE 12d1-4

A. JUSTIFICATION

1. Necessity for the Information Collection

Section 12(d)(1) of the Investment Company Act of 1940 (the “Act”) (15 U.S.C. 80a-12(d)(1)) limits the ability of a fund to invest substantially in securities issued by another fund. Rule 12d1-4 (17 CFR 270.12d1-4), however, permits certain registered funds and business development companies (“BDC”) (“acquiring fund”) that satisfy certain conditions to acquire shares of other certain registered funds and BDCs (“acquired fund”) in excess of the limits of section 12(d)(1) of the Act without obtaining an exemptive order from the Commission.¹ These conditions, described in more detail below, include requirements that constitute a collection of information. This collection of information is voluntary because rule 12d1-4 is an exemptive rule and, therefore, funds may choose not to rely on the proposed rule.

Voting Provisions. Under rule 12d1-4, where an acquiring fund and its advisory group (in the aggregate) hold more than 25% of the outstanding voting securities of an acquired fund that is a registered open-end investment company or registered unit investment trust (“UIT”), the acquiring fund will be required to vote those securities using mirror voting, unless certain exceptions apply.² If the acquired fund is a closed-end fund, the acquiring fund and its advisory group must vote its securities using mirror voting if they, in the aggregate, hold more than 10%

¹ See 17 CFR 270.12d1-4.

² See rule 12d1-4(b)(1)(ii) and (iii). In mirror voting, the acquiring fund votes the shares it holds in the same proportion as the vote of all other holders. See Fund of Funds Arrangements, Investment Company Act Release No. 34045 (Oct. 7, 2020) [85 FR 73924 (Nov. 19, 2020)].

of the outstanding voting securities, unless certain exceptions apply.³ In addition, in circumstances where acquiring funds are the only shareholders of an acquired fund, pass-through voting may be used.⁴

Fund of Funds Investment Agreement. Unless the acquiring fund’s adviser acts as the acquired fund’s investment adviser, rule 12d1-4 requires that the acquiring fund enter into an agreement containing certain provisions with the acquired fund effective for the duration of the funds’ reliance on the rule. Funds subject to this requirement must maintain a copy of these agreements.⁵

Management Companies -- Fund Findings. In cases where the acquiring fund is a management company,⁶ rule 12d1-4 requires, prior to the initial acquisition of an acquired fund in reliance on the rule, the acquiring fund’s investment adviser to evaluate the complexity of the structure and fees and expenses associated with the acquiring fund’s investment in the acquired fund, and find that the acquiring fund’s fees and expenses do not duplicate the fees and expenses of the acquired fund. In cases where the acquired fund is a management company, rule 12d1-4 requires, prior to the initial acquisition of the acquired fund in reliance on the rule, the acquired fund’s investment adviser to find that any undue influence concerns associated with the acquiring fund’s investment in the acquired fund are reasonably addressed and, as part of this

³ See rule 12d1-4(b)(1)(ii) and (iii).

⁴ In circumstances where all holders of the outstanding voting securities of the acquired fund are required by rule 12d1-4 or otherwise under section 12(d)(1) to mirror vote the securities of the acquired fund, the acquiring fund may use pass-through voting instead of mirror voting. See rule 12d1-4(b)(1)(ii).

⁵ Rule 12d1-4(b)(2)(iv) and (c).

⁶ “Management companies” are defined as an investment company other than a face amount certificate company or UIT. See 15 U.S.C. 80a-4.

finding, the investment adviser must consider at a minimum certain enumerated factors. The rule further requires that each investment adviser report its evaluation, finding, and the basis for its evaluation or finding to the fund's board of directors no later than the next regularly scheduled meeting of the board of directors. The rule also requires the acquiring and acquired funds participating in fund of funds arrangements in accordance with the rule to maintain and preserve a copy of each fund of funds investment agreement that is in effect, or was in effect in the past five years, and a written record of the relevant Fund Findings (and the basis for the Fund Findings) made under the rule.⁷

UITs -- Principal Underwriter or Depositor Evaluations. The rule requires that, in cases where the acquiring fund is a UIT, the UIT's principal underwriter or depositor must evaluate the complexity of the structure associated with the UIT's investment in acquired funds, and find that the UIT's fees and expenses do not duplicate the fees and expenses of the acquired funds that the UIT holds or will hold at the date of deposit. The UIT is also required to keep records of the finding, and any basis for the finding.⁸

Separate Accounts Funding Variable Insurance Contracts. Lastly, the rule requires that, with respect to a separate account funding variable insurance contracts that invest in an acquiring fund, the acquiring fund must obtain a certification from the insurance company offering the separate account. The certification must state that the insurance company has determined that the fees and expenses borne by the separate account, acquiring fund, and acquired fund, in the

⁷ Rule 12d1-4(b)(2)(i) and (c).

⁸ Rule 12d1-4(b)(2)(ii) and (c).

aggregate, are consistent with the standard set forth in section 26(f)(2)(A) of the Act. The acquiring fund will be required to keep a record of this certification.⁹

2. Purpose and Use of the Information Collection

The purpose of the information collection requirement in rule 12d1-4 is to ensure both that the concerns that led Congress to adopt section 12(d)(1) are mitigated and that funds relying upon the rule as an exemption from that section comply with the rule's requirements.

3. Consideration Given to Information Technology

The information collected under the rule is not submitted to the Commission. The rule does not stipulate any particular method for communicating or preserving the information collected. The Electronic Signatures in Global and National Commerce Act¹⁰ and the conforming amendments to rules under the Investment Company Act permit funds to maintain records electronically.

4. Duplication

The Commission is not aware of any duplicate reporting or recordkeeping requirements concerning proposed rule 12d1-4.

5. Effects on Small Entities

The Commission reviews all rules periodically, as required by the Regulatory Flexibility Act (5 U.S.C. 601 *et seq.*), to identify methods to minimize recordkeeping or reporting requirements affecting small businesses. The requirements of rule 12d1-4 do not distinguish between small entities and larger entities. The burden on smaller entities may be greater than for

⁹ Rule 12d1-4(b)(2)(iii) and (c).

¹⁰ P.L. 106-229, 114 Stat. 464 (June 30, 2000).

larger entities. This burden includes the cost of establishing and conducting a voting system in accordance with the rule, negotiating and maintaining fund of fund investment agreements, and establishing procedures for conducting the required evaluations, findings, and certifications. The Commission believes, however, that imposing different requirements on smaller investment companies would not be consistent with investor protection and the purposes of the registration statements. Further, entities eligible to rely on rule 12d1-4 are required to comply with the requirements of the rule only if they wish to rely on the rule's exemptions.

6. Consequences of Not Conducting Collection

Less frequent information collection would be incompatible with the objectives of rule 12d1-4. The requirements of the rule are necessary to ensure that the concerns in section 12(d)(1) are adequately addressed by funds relying on the rule's exemptions.

7. Inconsistencies With Guidelines in 5 CFR 1320.5(d)(2)

Not applicable.

8. Consultations Outside the Agency

The Commission requested public comment on the collection of information requirements in rule 12d1-4 before it submitted this request for extension and approval to the Office of Management and Budget. The Commission received no comments in response to this request. The Commission and the staff of the Division of Investment Management participate in an ongoing dialogue with representatives of the fund industry through public conferences, meetings and informal exchanges. These forums provide the Commission and the staff useful means to identify and address paperwork burdens that may confront the industry.

9. Payment or Gift

Not applicable.

10. Confidentiality

Not applicable.

11. Sensitive Questions

Not applicable.

12. Burden of Information Collection¹¹

Voting Provisions. With respect to the voting provisions described above, Commission staff estimates that 446 acquiring funds will be subject to the requirements in rule 12d1-4(b)(ii), 436 of which will be utilizing mirror voting and 10 of which will be utilizing pass-through

¹¹ The Commission's estimates of the relevant wage rates below are based on salary information for the securities industry compiled by the Securities Industry and Financial Markets Association's Office Salaries in the Securities Industry 2013. The estimated wage figures are modified by Commission staff to account for an 1,800-hour work-year and inflation, and multiplied by 5.35 to account for bonuses, firm size, employee benefits, overhead.

voting.¹² With respect to mirror voting, Commission staff estimates that, on average, internal counsel for such funds will spend 3 hours updating proxy voting policies and disclosures for such funds and 3 hours conducting voting procedures at a cost of \$484 per hour. Thus, the staff estimates that the annual hour burden of the collection of information imposed by the mirror voting provisions to be 6 hours per fund, at a cost of \$2,904 per fund.¹³ Because the staff estimates that, each year, 436 funds will be subject to the mirror voting provisions in rule 12d1-4(b)(ii), the total burden for this aspect of the information collection is 2,616 hours at a cost of \$1,266,144.¹⁴

¹² 446 acquiring funds that will invest in open-end funds or UITs in reliance on rule 12d1-4 and beyond the 25% voting threshold = 4,061 series of management companies relying upon rule 12d1-4 or statutory exemption per Form N-CEN items C.7.l and C.7.m (based on data as of December 2022, as derived from N-CEN filings through July 14, 2023) plus 37 acquiring BDCs (consistent with the prior renewal) and multiplied by 11% of acquiring funds that invest in at least one open-end fund or UIT beyond the 25% voting threshold of the rule (as estimated in the prior renewal). This estimate assumes that acquiring funds with current investments in other funds beyond the limits of section 12(d)(1) are subject to rule 12d1-4 at the same rate as the acquiring funds with current investments in other funds within the limits of section 12(d)(1). We lack structured data that would allow us to estimate the percentage of acquiring funds that are within the same group of investment companies as the acquired fund or the acquiring fund's investment sub-adviser or any person controlling, controlled by, or under common control with such investment sub-adviser acts as the acquired fund's investment adviser or depositor, and thus will be subject to the rule's voting condition. To avoid underestimating the costs associated with this aspect of rule 12d1-4, we assume that all the 446 acquiring funds will be subject to the rule's conditions. We estimate that 10 funds will utilize pass-through voting in limited circumstances. In circumstances where all holders of the outstanding voting securities of the acquired fund are required by rule 12d1-4 or otherwise under section 12(d)(1) to mirror vote the securities of the acquired fund, the acquiring fund may use pass-through instead of mirror voting. It is estimated that (consistent with the prior renewal) 2.2% of acquiring funds that will invest in open-end funds or UITs in reliance on rule 12d1-4 and beyond the 25% voting threshold will use pass-through voting (*i.e.*, 2.2% of 446 acquiring funds equals 10 funds using pass-through voting).

¹³ This estimate is based on the following calculations: $\$1,452$ (3 hours x $\$484$ = $\$1,452$) plus $\$1,452$ (3 hours x $\$484$ = $\$1,452$) equals $\$2,904$.

¹⁴ This estimate is based on the following calculations: $2,616 = 6$ hours x 436 funds; $\$1,266,144 = \484 x 2,616 hours.

In addition to the mirror voting provisions of the rule, there are some circumstances in which the acquiring funds are the only shareholders of an acquired fund and, in such cases, pass-through voting may be used. Staff estimates that 10 funds will use pass-through voting.¹⁵ Staff estimates that internal counsel for such funds will spend 3 hours updating proxy voting policies and disclosures and 30 hours communicating with shareholders and voting accordingly at a cost of \$484 per hour. Thus, the staff estimates that the annual hour burden of the collection of information imposed by the pass-through provisions to be 33 hours per fund, at a cost of \$15,972 per fund.¹⁶ Because staff estimates that, each year, 10 funds will be subject to the pass-through voting provisions of the rule, the total burden for this aspect of the information collection is 330 hours at a cost of \$159,720.¹⁷

Combining the estimates for the mirror voting and pass-through voting calculations, staff estimates that 446 funds will spend at total of 2,946 hours at an internal cost of \$1,425,864 complying with the voting provisions of the rule.¹⁸

Fund of Funds Investment Agreements. With respect to the fund of funds investment agreement provisions described above, Commission staff estimates that 12,900 funds that do not have the same investment adviser are subject to the requirement to enter into an agreement prior

¹⁵ See footnote 12.

¹⁶ This estimate is based on the following calculations: 33 = 30 + 3; \$1,452 (3 hours x \$484 = \$1,452) plus \$14,520 (30 hours x \$484 = \$14,520) equals \$15,972.

¹⁷ This estimate is based on the following calculations: 330 hours (33 hours x 10 funds) multiplied by \$484 equals \$159,720.

¹⁸ This estimate is based on the following calculations: 446 (436 + 10; combined total of funds using mirror voting and funds using pass-through voting); 2,946 (2,616 hours plus 330 hours) multiplied by \$484 equals \$1,425,864.

to the purchase of acquired fund shares in excess of section 12(d)(1)'s limits.¹⁹ Commission staff estimates, however, that the majority of affected funds have already complied with this requirement and staff assumes that, absent structured data to further calculate, 645 funds (5% of affected funds) would be newly subject to the rule on an annual basis.²⁰ Commission staff estimates that such newly affected funds will spend 20 hours negotiating and memorializing the necessary agreements at an estimated costs of \$10,260 per fund.²¹ Commission staff further estimates that newly affected funds will spend 6 hours establishing recordkeeping and policies and procedures at an estimated cost of \$552 per fund.²² Accordingly, staff estimates that the annual burden solely for newly affected funds will be 26 hours at an estimated total cost \$10,812 per fund.²³ Commission staff further estimates that all affected funds will spend 12 hours on ongoing recordkeeping at an estimated cost of \$1,104 per fund.²⁴ This results in a total annual

¹⁹ This estimate is based on the number of acquiring-acquired fund pairs that do not share the same adviser as indicated in form N-PORT data between December 2022 and July 14, 2023 (18,695) and, consistent with the prior renewal, assumes that 69% of such acquiring-acquired fund pairs will be subject to rule 12d1-4 (*i.e.*, $12,900 = 18,695 \times 0.69$).

²⁰ This estimate is based on the following calculation: $645 = 12,900 \times 0.05$.

²¹ Consistent with the prior renewal, this estimate includes a blended hourly rate of \$513 based on the rates for an in-house attorney (\$484), deputy general counsel (\$695), and compliance manager (\$360). This estimate is based on the following calculation: $\$10,260 = \513×20 .

²² This estimate assumes that a general clerk (\$73/hr.) will spend 3 hours and that a senior computer operator (\$111/hr.) will spend 3 hours on such work. This estimate is based on the following calculation: $\$552 = (\$73 \times 3) + (\$111 \times 3)$.

²³ This estimate is based on the following calculations: $26 \text{ hours} = 20 + 6$; $\$10,812 = \$10,260 + \$552$.

²⁴ This estimate assumes that a general clerk (\$73/hr.) will spend 6 hours and that a senior computer operator (\$111/hr.) will spend 6 hours on such work. This estimate is based on the following calculations: $\$1,104 = (\$73 \times 6) + (\$111 \times 6)$; $12 \text{ hours} = 6 + 6$.

hour burden of 171,570 hours and total internal cost of \$21,215,340 with respect to this aspect of the rule.²⁵

Management Companies – Fund Filings. With respect to the management company fund finding provisions described above, Commission staff estimates that 2,974 acquired management companies will be subject to rule 12d1-4.²⁶ Commission staff further estimates that 4,965 acquiring management companies will be subject to rule 12d1-4.²⁷ This results in 7,939 management companies being subject to rule 12d1-4.²⁸ Commission staff estimates that such management companies will spend 18 hours conducting evaluations and creating, reviewing, and

²⁵ This estimate is based on the following calculations: 171,570 hours = (26 hours x 645 newly affected funds) + (12 hours x 12,900 affected funds); \$21,215,340 = (\$10,812 x 645) + (\$1,104 x 12,900 affected funds).

²⁶ 2,974 acquired management companies that will be subject to rule 12d1-4 = 4,310 acquired management companies x 69% of acquired management companies that will be subject to rule 12d1-4 (as estimated in the prior renewal). Our calculation assumes that the estimate of acquiring funds that will be subject to rule 12d1-4 is also applicable to acquired funds. 4,310 acquired management companies = 3,170 acquired registered investment companies (based on data as of December 2022, as derived from N-PORT filings through July 14, 2023) x 17,546 registered investment companies (based on data as of December 2022, as derived from N-PORT filings through July 14, 2023) / 12,906 management companies (based on data as of December 2022, as derived from N-CEN filings through July 14, 2023). This estimate assumes that acquired management companies with investments from acquiring funds beyond the limits of section 12(d)(1) will be subject to rule 12d1-4 at the same rate as the acquired management companies with investments from acquiring funds within the limits of section 12(d)(1).

²⁷ 4,965 acquiring management companies that will be subject to rule 12d1-4 = 7,195 acquiring management companies (based on data as of December 2022, as derived from N-PORT filings through July 14, 2023) x 69% of acquiring management companies that will be subject to rule 12d1-4 (consistent with the prior renewal). This estimate assumes that acquiring management companies with current investments in other funds beyond the limits of section 12(d)(1) will be subject to rule 12d1-4 at the same rate as the acquiring management companies with current investments in other funds within the limits of section 12(d)(1) following the rule adoption.

²⁸ 7,939 = 2,974 + 4,965.

maintaining written materials pursuant to the rule at a cost of \$3,632 per fund.²⁹ This results in a total annual hour burden of 142,902 hours and total internal cost of \$28,834,448.³⁰

UITs -- Principal Underwriter or Depositor Evaluations. With respect to the UIT principal underwriter or depositor evaluations discussed above, Commission staff estimates that 541 acquiring UITs will be subject to rule 12d1-4.³¹ Commission staff estimates that such UITs will spend 5 hours annually conducting evaluations and creating, reviewing, and maintaining written materials at cost of \$460 per fund.³² This results in a total annual hour burden of 2,705 hours and total internal cost of \$248,860.³³

Separate Accounts Funding Variable Insurance Contracts. With respect to the separate account funding variable insurance contracts discussed above, Commission staff estimates that 186 acquiring separate accounts will be subject to rule 12d1-4.³⁴ Commission staff estimates that

²⁹ This estimate assumes an internal burden that includes 8 hours of work at a rate of \$339 (blended rate for compliance attorney [\$425] and senior accountant [\$252]); 5 hours of work at a rate of \$73 (general clerk); and 5 hours of work at a rate of \$111 (senior computer operator). $\$3,632 = (8 \times \$339) + (5 \times \$73) + (5 \times \$111)$; 18 hours = 8 + 5 + 5.

³⁰ This estimate is based on the following calculations: $142,902 = 18 \text{ hours} \times 7,939 \text{ funds}$; $\$28,834,448 = (\$3,632 \times 7,939)$.

³¹ This estimate assumes that there are 1,353 series of UITs and that 40% of such UITs are acquiring UITs (as estimated in the prior renewal). The estimate of 1,353 series of UITs is based on data as of December 2022, as derived from N-CEN filings (items F.18 and F.19) through July 14, 2023.

³² This estimate assumes 2.5 hours of general clerk time at a rate of \$73/hr. and 2.5 hours of senior computer operator time at a rate of \$111/hr. $5 \text{ hours} = 2.5 + 2.5$; $\$460 = (73 \times 2.5) + (111 \times 2.5)$.

³³ This estimate is based on the following calculations: $2,705 = 5 \text{ hours} \times 541 \text{ funds}$; $\$248,860 = \$460 \times 541 \text{ funds}$.

³⁴ 186 acquiring separate accounts that will be subject to rule 12d1-4 = [418 variable annuity separate accounts registered as UITs + 240 variable life insurance separate accounts registered as UITs + 15 management company separate accounts (these figures are based on data as of December 2022, as derived from N-CEN filings through July 14, 2023)] x 40% of funds that are acquiring funds (as estimated in the prior renewal) x 69% of acquiring separate accounts that will be subject to rule 12d1-4 as estimated by a commenter (as estimated in the prior renewal).

separate accounts will spend 4 hours annually obtaining certificates and maintaining records at a cost of \$750 per separate account.³⁵ This results in a total annual hour burden of 744 hours and total internal cost of \$139,500.³⁶

The following estimates of average internal burden hours and monetized burden hour costs are made solely for purposes of the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.) and are not derived from a comprehensive or even representative survey or study of the cost of Commission rules and forms. The table below summarizes the annual responses, burden hours, and burden hour cost estimates for rule 12d1-4:

³⁵ This estimate assumes 1 hour of in-house time at a rate of \$484/hour, 1 hour of compliance clerk time at a rate of \$82/hour, 1 hour of general clerk time at a rate of \$73/hour, and 1 hour of senior computer operator time at a rate of \$111. $4 \text{ hours} = 1 + 1 + 1 + 1$; $\$750 = \$484 + \$82 + \$73 + \$111$.

³⁶ This estimate is based on the following calculations: $744 = 4 \text{ hours} \times 186 \text{ funds}$; $\$139,500 = \$750 \times 186 \text{ funds}$.

Information Collection	Annual No. of Responses			Annual Time Burden (Hrs.)			Monetized Time Burden (\$)		
	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>	<i>Previously approved</i>	<i>Requested</i>	<i>Change</i>
Voting Provisions	450	446	-4	2,970	2,946	-24	\$1,231,860	\$1,452,864	\$221,004
Fund of Fund Investment Agreements	9,240	12,900	3,660	351,120	171,570	-179,550	\$95,334,624	\$21,215,340	-\$74,119,284
Management Company Findings	6,178	7,939	1,761	216,230	142,902	-73,328	\$92,632,932	\$28,834,448	-\$63,798,484
UIT Evaluations	200	541	341	7,000	2,705	-4,295	\$2,450,500	248,860	-2,201,640
Separate Account Certificates	191	186	-5	764	744	-20	\$123,959	139,500	15,541
Total	16,259	22,012	5,753	578,084	320,867	-257,217	191,773,875	51,891,012	-139,882,863

13. Cost to Respondents

Cost burden is the cost of goods and services purchased to collect the information required under rule 12d1-4. The cost burden does not include the hour burden discussed in Item 12 above.

Voting Provisions. The staff estimates that, on average, outside counsel will spend 1 hour per vote conducting voting procedures with respect to mirror voting at a cost of \$565 per hour. Staff therefore estimates an annual external cost burden of \$246,340 with respect to mirror voting.³⁷ Staff further estimates that, with respect to pass-through voting, outside counsel will spend 1 hour to assist funds in communicating with shareholders and voting accordingly at a rate of \$565 per hour. Staff therefore estimates an annual external cost burden of \$5,650 with respect to pass-through voting.³⁸ Accordingly, staff estimates a total annual external cost of \$251,990 for compliance with the voting provisions of the rule.³⁹

Fund of Funds Investment Agreement. Staff estimates that, on average, for funds newly subject to the rule, outside counsel will spend 2 hours negotiating and memorializing the necessary agreements under the rule at a cost of \$565 per hour. Staff further estimates that, on average, for funds newly subject to the rule, outside counsel will spend 4 hours establishing recordkeeping policies and procedures. Accordingly, staff estimates a total annual external costs

³⁷ $\$246,340 = (\$565 \times 1 \text{ hour}) \times 436 \text{ funds subject to mirror voting.}$

³⁸ $\$5,650 = (\$565 \times 1 \text{ hour}) \times 10 \text{ funds subject to pass through voting.}$

³⁹ $\$251,990 = \$246,340 + \$5,650.$

of \$2,186,550 for compliance with the fund of funds investment agreement provisions of the rule.⁴⁰

Management Companies – Fund Filings. It is estimated that there is no external cost burden with respect to the management company findings provisions of the rule.

UITs – Principal Underwriter or Depositor Evaluations. It is estimated that there is no external cost burden with respect to the UIT evaluation provisions of the rule.

Separate Accounts Funding Variable Insurance Contracts. It is estimated that there is no external cost burden with respect to the separate account certification provisions of the rule.

As outlined above, we estimate the total external cost burden to comply with rule 12d1-4 to be \$2,438,540.⁴¹

14. Cost to the Federal Government

The proposed rule would not entail any costs on the federal government.

15. Changes in Burden

The burden hours for rule 12d1-4 have decreased from 578,084 hours to 320,867. This decrease of 257,217 hours is primarily due to the elimination of upfront hour burdens that no longer apply now that the rule has gone into effect. The estimated cost burden has decreased from \$243,953,880 to \$2,438,540. This decrease of \$241,515,340 is primarily due to the elimination of initial external cost burdens that no longer apply now that the rule has gone into effect.

⁴⁰ $\$2,186,550 = [(\$565 \times 2) + (\$565 \times 4)] \times 645$ funds newly subject to the fund of funds investment agreement provisions of the rule. See footnote 20 for the calculation of funds newly subject to the rule.

⁴¹ $\$2,438,540 = \$251,990 + 2,186,550$.

16. Information Collection Planned for Statistical Purposes

Not applicable.

17. Approval to Omit OMB Expiration Date

Not applicable.

18. Exceptions to Certification Statement for Paperwork Reduction Act

Submission

Not applicable.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.