

**Federal Trade Commission**  
**Supporting Statement for FTC Administrative Activities**  
**OMB Control No. 3084-0169**

The Federal Trade Commission (“FTC” or “Commission”) is seeking renewal of its existing clearance under the Paperwork Reduction Act (“PRA”), 44 U.S.C. §§ 3501-3521, for Administrative Activities. This clearance addresses: (a) requests to the Commission under Parts 1, 4 and 6 of the Commission’s Rules of Practice; (b) the FTC’s consumer reporting systems; and (c) the FTC’s program evaluation activities. Each section below is broken into subsections relating to these subject matter areas. The largest share of the burden for this clearance is attributable to collections of information associated with the FTC’s consumer reporting systems.

**JUSTIFICATION**

**1. Necessity for Collecting the Information**

**a) Requests to the Commission**

The Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 41 et seq., authorizes the Federal Trade Commission to collect information for the purpose of responding to requests for Commission action. Procedures relating to these collections are found in Parts 1 and 4 of the Commission’s Rules of Practice.

Pursuant to Part 1 of the FTC’s rules of practice, any person, partnership, or corporation may request advice from the Commission or FTC staff regarding a course of action the requester contemplates. *See* 16 C.F.R. §§ 1.1-1.3. Under Rule 1.2, the request should state the question that the requester wants resolved, disclose the identity of the companies and other persons involved, cite the provision of law under which the question arises, and state all facts the requester believes to be material. Such information is necessary for the Commission or FTC staff to render responsive advice.

The FTC’s ethics regulations require former FTC employees who are seeking ethical clearance to participate in FTC matters to submit screening affidavits to facilitate resolution of their requests. *See* Commission Rule 4.1(b), 16 C.F.R. § 4.1(b). Requests to participate must include, among other things, a description of the proceeding in which participation is contemplated; the name of the Commission office or division in which the former employee was employed and the position the employee occupied; and a statement whether, while employed by the Commission, the former employee participated in any proceeding or investigation concerning the same company, individual, or industry currently involved in the matter in question. These requirements prevent the improper use of confidential nonpublic information acquired while working at the FTC.

The Commission’s procedural rules also authorize outside parties to request employee testimony, through compulsory process or otherwise, and to request documentary material through compulsory process in cases or matters to which the agency is not a party. FTC Rule 4.11(e), 16 C.F.R. § 4.11(e). These rules require persons seeking testimony or material from the Commission to submit a statement in support of the request. The statement must set forth the

party's interest in the case or matter, the relevance of the desired testimony or material, and a discussion of whether it is reasonably available from other sources. If testimony is sought, the statement shall also contain a general summary of the testimony and a discussion of whether Commission records could be produced and used in its place. The required information is necessary to evaluate the request.

### **b) Consumer Reporting Systems**

The FTC's Bureau of Consumer Protection ("BCP") allows consumers to report fraud, identity theft, National Do Not Call Registry violations, and other business practices through telephone hotlines and three online consumer report forms.<sup>1</sup> Consumers may call a hotline phone number or go to the FTC's websites to report violations using the applicable reporting forms. The provision of this information is voluntary and helps BCP staff to carry out the agency's consumer protection mission. The FTC is also mandated by Congress under the Identity Theft and Assumption Deterrence Act of 1998, 18 U.S.C. §§ 1001 et seq., to serve as the central clearinghouse for identity theft reports.

### **c) Program Evaluations**

*Divestiture Review.* To resolve competitive concerns in mergers and acquisitions, the Commission may order divestiture of assets to an acquirer approved by the Commission. In order to assess the effectiveness of these divestitures, the FTC's Bureau of Competition's Compliance Division conducts relatively brief follow-up calls with acquirers of divested assets.

## **2. Use of the Information**

### **a) Requests to the Commission**

The Commission seeks information from members of the public who submit requests for Commission action to facilitate an appropriate response to their requests. For example, information submitted to the Commission pursuant to FTC Rule 4.1(b) enables the Commission to determine whether it should permit a person or entity to participate in an FTC matter. In addition, information submitted pursuant to Rule 4.11(e) requests enables FTC staff to determine how to best allocate agency resources (e.g., staff may deny a request for testimony from an FTC employee where it appears that such testimony would not be in the public interest).

### **b) Consumer Reporting Systems**

The FTC's Consumer Response Center ("CRC") processes consumer reports received by telephone and submitted online and stores them in Consumer Sentinel, a secure online database available only to law enforcement. The forms and surveys are used to improve public access to

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<sup>1</sup> These online forms ReportFraud.ftc.gov, IdentityTheft.gov, and DoNotCall.gov also include related variations that constitute the same basic "collection of information": (1) Spanish language versions also available at ReporteFraude.ftc.gov and Robodeidentidad.gov and (2) the [www.econsumer.gov](http://www.econsumer.gov) reporting form utilized for cross-border consumer reports.

the CRC and the reporting websites. Consumers may call a hotline phone number or may go on to the FTC's web sites to submit reports.

**c) Program Evaluations**

*Divestiture Review.* The information obtained by the FTC's Bureau of Competition as a result of its follow-up conversations with acquirers of divested assets under Commission merger orders will be used to assess the effectiveness of the orders and refine future remedies, where necessary and appropriate.

**3. Consideration of the Use of Information Technology to Reduce Burden**

The Commission employs electronic options for filing and data collection whenever possible, consistent with the purposes of the Government Paperwork Elimination Act, 44 U.S.C. § 3504 note ("GPEA").

**a) Requests to the Commission**

Requests for Commission action under the Commission's procedural rules are filed electronically and on paper. 16 C.F.R. § 4.2(d)(2).

**b) Consumer Reporting Systems**

The FTC offers consumers the ability to submit consumer reports via internet, mail, or telephone, but most consumers file consumer reports with the Commission via the internet or by telephone. When the Commission invites consumers to provide feedback regarding their experiences filing reports, it does so via the same means through which the report was filed.

**c) Program Evaluations**

*Divestiture Review.* Staff employ direct telephone conversations with the acquirers of divested assets to obtain information as part of divestiture reviews. Engaging in real time discussion enables both staff and acquirers to ask follow-up questions and seek additional clarification as necessary.

**4. Efforts to Identify Duplication/Availability of Similar Information**

**a) Requests to the Commission**

FTC staff has not identified any other sources that would provide the information necessary to review and respond to requests to the Commission pursuant to its Rules of Practice. It is important that requesters certify that they are making a full disclosure of relevant information to allow the Commission to respond effectively to requests for advisory opinions, clearance to participate in FTC matters, or to provide documents or testimony from Commission employees.

## **b) Consumer Reporting Systems**

Commission staff have not identified any other sources that would provide the information necessary to evaluate the effectiveness of the Commission's consumer reporting systems.

## **c) Program Evaluations**

Commission staff have not identified any other sources that would provide the information obtained through its program evaluation functions for its divestiture review programs. Information regarding the impacts of the Commission's divestiture orders are not readily available through other means.

## **5. Efforts to Minimize Burden on Small Businesses**

### **a) Requests to the Commission**

The Commission's Rules of Practice are designed to impose the minimum burden necessary on persons submitting requests for Commission action. The Commission's rules require submitters to provide only the information necessary to develop an informed response.

### **b) Consumer Reporting Systems**

FTC consumer reporting forms are designed to impose the minimum burden necessary on persons who submit consumer reports about fraud, identity theft, Do Not Call violations, and other issues. Contacting the CRC with a consumer report is entirely voluntary, and consumers have full discretion in determining how much information to provide with their reports. In addition, to facilitate consumer reporting, the FTC provides user-friendly websites to walk consumers through the reporting process and offers hotline to assist consumers and small businesses throughout the United States.

### **c) Program Evaluations**

*Divestiture Review.* Surveys conducted as part of the Commission's divestiture review process are unlikely to impose burden on small businesses. The acquirers of divested assets are typically not small businesses. To the extent that small businesses are involved in a divestiture review, the Commission has minimized the potential burden on survey recipients. Participation is voluntary, and the time involved to prepare for and participate in survey phone calls is limited.

## **6. Consequences of Conducting Collection Less Frequently**

### **a) Requests to the Commission**

The required information is necessary to evaluate requests for Commission action pursuant to its procedural rules. If the information required was collected less frequently, the FTC's ability to evaluate requests to participate in Commission matters and requests for

documents or testimony would be undermined. In addition, the Commission's efforts to prevent the misuse of nonpublic information would be hampered.

### **b) Consumer Reporting Systems**

The requested information allows the FTC to evaluate the efficacy of its consumer reporting systems. If the FTC is unable to collect timely information on consumer reports and customer satisfaction, the agency will lack critical input to effectively: (1) address consumer education needs nationwide; (2) target companies and individuals actively defrauding the public; and (3) review industry compliance with the numerous statutes and regulations enforced by the FTC.

The consumer report data collected through the consumer reporting systems is the foundation of the FTC's highly successful Consumer Sentinel Network. The Consumer Sentinel Network allows federal, state and local law enforcement organizations common access to a secure database containing over 50 million consumer reports, including victims of consumer fraud and identity theft. To date, Consumer Sentinel has nearly 3,000 individual members, including international law enforcement agencies. The continuous collection of consumer report data is critical to the Consumer Sentinel Network's sustained success.

The FTC is also mandated by Congress under the Identity Theft and Assumption Deterrence Act of 1998, 18 U.S.C. § 1028 note, to be the central clearinghouse for identity theft reports. The FTC's efforts in this regard serve to fulfill its statutory obligation.

### **c) Program Evaluations**

*Divestiture Review.* The information is collected infrequently. Staff attempts to conduct the first phone call approximately a year after the divestiture is completed, and conducts follow-up phone calls thereafter only if required. If these calls were not made, staff would not necessarily become aware of issues that arise with a particular divestiture.

## **7. Circumstances Requiring Collection Inconsistent With Guidelines**

This collection of information is consistent with all applicable guidelines contained in 5 C.F.R. § 1320.5(d)(2).

## **8. Consultation Outside the Agency**

The FTC sought public comment on its request to OMB for a three-year extension of the current PRA clearance for this information collection, as required by 5 C.F.R. § 1320.8(d). *See* 89 Fed. Reg. 20,972 (March 26, 2024). No germane comments were received. The FTC is providing a second opportunity for public comment while seeking OMB approval to extend this PRA clearance.

## **9. Payments or Gifts to Respondents**

Not applicable.

## **10-11. Assurances of Confidentiality/Matters of a Sensitive Nature**

Information collected by the FTC for a law enforcement purpose is subject to the confidentiality provisions of Sections 6(f) and 21 of the Federal Trade Commission Act, 15 U.S.C. §§ 46(f), 57b-2, as applicable. Moreover, it is the FTC's general policy not to publish or divulge the name of a consumer who submitted a report except as required by law or by the FTC's rules. For example, the FTC may disclose the identity of a consumer who submitted a report in the course of referring the report to other legal authorities. *See* FTC Rule of Practice 2.2(c), 16 C.F.R. § 2.2(c).

The FTC may share certain consumer reports with the company that is the subject of the report, if the FTC determines that such sharing would help resolve the consumer's concern. Identity theft information also may be disclosed to financial institutions that have signed a confidentiality agreement with the FTC. The FTC shares this information to fulfill its statutory obligation under the Identity Theft and Assumption Deterrence Act of 1998, 18 U.S.C. § 1028 note.<sup>2</sup> Finally, the Commission may post trend reports based on aggregate data from consumer reports on the FTC.gov website, at <https://www.ftc.gov/enforcement/data-visualizations/explore-data>. However, the Commission does not release personally identifying information in these reports.

Information collected by the FTC is maintained and safeguarded in accordance with the requirements of the Federal Information Security Modernization Act of 2014, 44 U.S.C. §§ 3551 *et seq.*, and applicable OMB and NIST guidance. Notice to individuals about the FTC's information collection authority, purpose, and routine uses of their information is provided under the Privacy Act of 1974, 5 U.S.C. § 552a, as applicable, and in system of records notices published pursuant to the Act, including the safeguards that apply to such information. *See* <https://www.ftc.gov/site-information/privacy-policy/privacy-act-systems>.

## **12. Burden Estimate**

**Estimated annual hours burden: 1,414,076 hours**

**Estimated annual cost burden: \$21,600**

### **a) Requests to the Commission: 120 hours**

FTC staff bases its estimates for requests to the Commission on the average number of requests received in recent years. Based on this experience, staff estimates that the FTC receives annually approximately 30 requests for clearance submitted by former FTC employees to

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<sup>2</sup> In part, the Act requires that the FTC establish procedures to refer complaints to appropriate entities, which may include "(A) the three major national consumer reporting agencies; and (B) appropriate law enforcement agencies for potential law enforcement action."

participate in certain matters and screening affidavits submitted by partners or legal or business associates of former employees pursuant to Rule 4.1(b), 16 C.F.R. § 4.1(b). There are also procedures set out in Rule 4.11(e) for agency review of outside requests for Commission employee testimony, through compulsory process or otherwise, in cases or matters to which the agency is not a party. Rule 4.11(e) requires that a person who seeks such testimony submit a statement in support of the request. That statement must include the party's interest in the given case or matter, the relevance of testimony or material sought, and a discussion of whether it is reasonably available from other sources. Staff estimates that agency personnel receive approximately 15 such requests per year.

The Commission estimates that the above along with other miscellaneous requests including requests for Commission or staff advisory opinions total approximately 60 requests per year. Staff estimates respondents will incur, on average, approximately 2 hours of burden to submit a request, resulting in a cumulative **120 burden hours** per year (60 requests × 2 burden hours).

#### **Annual cost burden:**

The Commission determines estimated labor costs by applying applicable wage rates to the burden hours discussed above. Commission staff estimates that executives and attorneys for a requester typically prepare and submit requests for Commission action. Based on an estimated average wage of \$150/hour for executive and attorney wages, staff estimates a total annual cost burden of **\$18,000** (120 hours × \$150). Staff estimates that requesters would incur no capital, start-up, operation, maintenance, or other similar costs associated with submitting covered requests.

#### **b) Consumer Reporting Systems: 1,413,936 annual hours**

##### Consumer Response Center (CRC)

Consumers can submit reports about fraud and other violations of law via the telephone or through the FTC's website to the CRC. Both methods collect the same types of data; telephone counselors request the same information that consumers would enter on the applicable forms available on the FTC's websites. For telephone users, FTC staff estimates that it takes approximately 8.7 minutes per call to gather the necessary information. FTC staff estimates that it takes a consumer approximately 5.16 minutes to enter information on the Commission's online consumer report form.

##### Consumer Reports Concerning the National Do Not Call Registry

Consumer can submit reports regarding potential violations of the FTC's Telemarketing Sales Rule, 16 C.F.R. Part 310, and compliance with the National Do Not Call Registry. To facilitate reporting, the FTC maintains both an online form and a toll free hotline with an automated voice response system. The form and voice response system prompt consumers to provide necessary information, including the phone number that was called, whether the call was prerecorded, the date and time of the call, their contact information, and any additional

comments regarding their experience. FTC staff estimates consumers are likely to spend approximately 3 minutes for filing a report by phone and 2.5 minutes for online reports.

### Identity Theft

Identity theft reports generally require the FTC to collect more information than is typical for consumer fraud reports, including description of actions the consumers have taken with credit bureaus, companies, and law enforcement, and the identification of multiple suspects.<sup>3</sup> In addition, the FTC's IdentityTheft.gov website provides consumers with enhanced features to allow consumers to create a personal recovery plan and various steps to implement it. For consumers who create a personalized recovery plan, FTC staff estimates that consumers will need 15 minutes, on average, to complete the reporting form, create an IdentityTheft.gov account, and to review their personalized recovery plan. For consumers who file an identity theft report but do not opt to create a personalized recovery plan, FTC staff estimates that consumers will need approximately 8.5 minutes, on average, to complete the online identity theft reporting form. For consumers who choose to report identity theft via phone, FTC staff estimates that it takes approximately 7.2 minutes per call to file an identity theft report.<sup>4</sup>

### Consumer Surveys

The FTC conducts satisfaction surveys and collects feedback to obtain information about the support that the call center and reporting websites provide to consumers. Each consumer surveyed is asked several questions chosen from a list prepared by staff. The questions request information about the overall effectiveness of the call center and online consumer reporting forms. For the online surveys and feedback forms, half of the questions ask consumers to rate performance on a scale or request a yes-or-no response. The second half of the online survey asks more open-ended questions seeking a short answer. In addition, the call center may survey a sample of consumers immediately after they file their reports regarding the services they received. Staff estimates that each respondent will require 4.3 minutes to answer the questions during the phone survey and about 3.1 minutes for the online survey (approximately 20-30 seconds per question).

The FTC uses Qualtrics for online customer satisfaction and feedback surveys on [ReportFraud.ftc.gov](https://www.reportfraud.ftc.gov) and [IdentityTheft.gov](https://www.identitytheft.gov). Staff estimates the brief survey will require 5.57 minutes per respondent. This estimate and others relating to these surveys are included under "Misc. and fraud-related consumer reports (Web chat)" in the table below.

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<sup>3</sup> Executive Order 13681, *Improving the Security of Consumer Financial Transactions* (October 17, 2014), mandated that the FTC establish a reporting system for Identity Theft victims on IdentityTheft.gov.

<sup>4</sup> A substantial portion of identity theft-related calls typically consists of counseling consumers on other steps they should consider taking to obtain relief (which may include directing consumers to a revised online identity theft report or recovery plan). The time needed for counseling is excluded from this estimate.

In addition, the FTC uses Leidos for online exit surveys on IdentityTheft.gov to allow consumers who leave the website without filing a report to provide information about their experience. Staff estimates the brief exit survey will require less than 1 minute per respondent.

Consumer Sentinel Network Survey

The following table details FTC staff estimates of burden for these various collections of information, including the surveys. These estimates are based on the average number of consumer reports received annually for the previous three years from 2020-2023, and represent FTC staff’s projections for the next three-year clearance period. The FTC has experienced an increase in consumer report volumes during the prior three years following a temporary decrease over the course of the prior three-year clearance. As a result, these estimates represent an increase in overall consumer report volumes from the prior clearance, and are more in line with the Commission’s historical experience.

| <b>Activity</b>   | <b>#Respondents</b> | <b>#Minutes/Activity</b> | <b>Total Hours</b> |
|---|---------------------|--------------------------|--------------------|
| Misc. and fraud-related consumer reports (phone)                                    | 476,175             | 8.7 min                  | 69,045 hrs.        |
| Identity theft reports (phone)  | 293,597             | 7.2 min                  | 35,232 hrs.        |
| CRC Customer Satisfaction Questionnaire (phone)                                     | 13,376              | 4.3 min                  | 959 hrs.           |
| CRC Customer Satisfaction and Feedback Questionnaire (online) – ReportFraud.ftc.gov | 22,241              | 3.1 min                  | 1,149 hrs.         |
| CRC Customer feedback and exit survey Questionnaire (online) – IdentityTheft.gov    | 4,728               | 3.1 min                  | 244 hrs.           |
| Misc. and fraud-related consumer reports (online)                                   | 4,364,003           | 5.16 min                 | 375,304 hrs.       |
| Identity theft reports (online)   | 3,119,075           | 9.8 min                  | 509,449 hrs.       |
| Misc. and fraud-related consumer reports (Web chat)                                 | 77,614              | 5.57 min                 | 7,205 hrs.         |
| Identity Theft (Web chat)   | 104,282             | 4.6 min                  | 7,995 hrs.         |

|  |                  |         |                  |
|--|------------------|---------|------------------|
| Misc. and fraud-related consumer reports (Live Web chat) | 3,950            | 9.6 min | 632 hrs.         |
| Identity theft (Live Web chat)                           | 23,934           | 9.9 min | 3,949 hrs.       |
| Do-Not-Call related. consumer reports (phone)            | 1,022,325        | 3 min   | 51,116           |
| Do-Not-Call related. consumer reports (online)           | 8,473,199        | 2.5 min | 353,050          |
| <b>Totals</b>  | <b>9,705,304</b> |         | <b>1,413,936</b> |

**Annual cost burden:**

The cost per respondent to file a consumer report is negligible. Participation is voluntary and will not require any labor expenditures by respondents. There are no capital, start-up, operation, maintenance, or other similar costs for respondents.

**c) Program Evaluations: 20 hours**

*Divestiture Review: 20 hours*

In 2023, 2022, and 2021, the Commission issued 9, 14, and 6 orders, respectively, and a few required divestitures. Bureau of Competition (BC) staff monitors and evaluates the effectiveness of these remedies by interviewing purchasers of the divested assets within the first year after the divestiture is completed.<sup>5</sup>

BC staff interviews representatives of the buyers to ask whether all assets required to be divested were, in fact, divested; whether the buyer has used the divested assets to enter the market of concern to the Commission and, if so, the extent to which the buyer is participating in the market; whether the divestiture met the buyer’s expectations; and whether the buyer believes the divestiture has been successful. In a few cases, BC staff may also interview monitors, if appropriate. In these interviews, staff seeks to learn about pricing and other basic facts regarding competition in the markets of concern, and participation is voluntary.

For interviews with purchasers of divested assets, responding companies designate the company representative most likely to have the necessary information; typically, a company executive and an attorney represent the company. Each interview takes less than one hour to complete. BC staff further estimates that it takes each participant no more than one hour to

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<sup>5</sup> In rare instances when staff has difficulty reaching the buyer (for example, the initial buyer has either sold the divested assets or has dissolved in bankruptcy), staff will attempt to contact the then current owners of the assets if one exists. Even so, the information gathered during the interviews with successor owners will be very similar to what staff would seek from the initial buyer.

prepare for the interview. Accordingly, staff estimates that, for each interview with purchasers of divested assets, staff estimates that two individuals (typically a company executive and an attorney) will devote two hours each (one hour preparing and one hour participating) to responding to questions for a total of four hours. Assuming that staff evaluates approximately 4 divestitures per year during the three-year clearance period, staff estimates that the total hours burden will be approximately 16 hours per year (4 divestiture reviews × 4 hours for preparing and participating). Staff may include approximately two monitor interviews a year. Interviews of monitors typically involve only the monitor and staff estimates that monitors will devote approximately one hour to complete the interview and no more than one hour to prepare for the interview. This yields a burden of 4 hours for interviews with monitors (2 interviews × 2 hours for preparing and participating). This yields a total burden of 20 **burden hours** per year.

### **Annual cost burden:**

Using the burden hours estimated above, staff estimates that the total annual labor cost, based on an estimated average of \$150/hour for executive and attorney wages, would be **\$3,600** (24 hours × \$150). There are no capital, start-up, operation, maintenance, or other similar costs to respondents.

### **13. Estimated Capital and other Non-Labor Costs**

There are no capital, start-up, operation, maintenance, or other similar costs to the respondents.

### **14. Estimated Cost to Federal Government**

Internal costing is based on the following assumed hourly wages for FTC staff, inclusive of benefits: attorneys (\$106/hour); paralegals (\$85/hour); secretarial (\$45/hour).

#### **a) Requests to the Commission: \$18,400**

Pursuant to Rule 4.1(b), the FTC receives approximately 30 requests for clearance submitted by former FTC employees to participate in certain matters and screening affidavits submitted by partners or legal or business associates of former employees. Staff spends roughly 2 hours of attorney time, in addition to 15 minutes of paralegal or secretarial support to resolve each request, resulting in an annual cost of approximately \$6,700.

The Commission's rules also provide for agency review of outside requests for Commission employee testimony through compulsory process or otherwise, requests for advisory opinions, and requests for documentary material pursuant to compulsory process in cases or matters to which the agency is not a party. Rule 4.11(e) requires that a person who seeks testimony or material must submit a statement in support of the request. Staff estimates that agency personnel receive approximately 4.5 requests seeking employee testimony each year. Staff estimates that requests solely for FTC employee testimony will require approximately two hours of staff attorney time plus 15 minutes of paralegal or secretarial support on each request.

Combined, that results in an approximate yearly cost of approximately \$1,000 per year to resolve requests for employee testimony.

Staff estimates that agency personnel receive approximately 24.5 other requests in a given year seeking advisory opinions or documentary materials.<sup>6</sup> FTC staff projects these requests will require on average four hours of attorney time and 15 minutes of paralegal or secretarial support to resolve. Cumulatively, for 24.5 requests, this totals approximately \$10,700 per year.

**b) Consumer Reporting Systems: \$13,600,000**

The total annual contract cost to the agency for its consumer reporting intake system discussed above is approximately \$13,600,000.

**c) Program Evaluations: \$1,272**

*Divestiture Review.* The total annual cost to the agency for the information collection is approximately \$1,272. Each of the 4 annual reviews require approximately 3.0 hours by a staff attorney. This includes about an hour to prepare for the call, the time for the call, and approximately one hour to write up the results.

**15. Changes in Burden**

The largest share of the burden for this clearance is attributable to collections of information associated with the FTC's consumer reporting systems. The changes in burden estimates for the renewal period result from an increase in FTC staff's estimates of the number of reports that are anticipated for the period. These estimates are based on the average number of consumer reports received annually for the previous three years from 2020-2023, and represent FTC staff's projections for the next three-year clearance period. The FTC has experienced an increase in consumer report volumes during the prior three years following a temporary decrease over the course of the prior three-year clearance. As a result, these estimates represent an increase in overall consumer report volumes from the prior clearance, and are more in line with the Commission's historical experience. See subsection (b) below for further details.

**a) Applications to the Commission:**

There has been a slight increase from 55 to 60 estimated requests per year.

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<sup>6</sup> Responding to requests for materials can cost more than responding to requests simply for Commission employee testimony since they generally require several hours of paralegal and staff attorney time to collect and review documents.

**b) Consumer Reporting Systems:**

The estimated annual hour burden relating to consumer reporting systems is adjusted upward from 452,131 in 2021 to 1,413,936 in 2023, because of an increase in the number of consumer reports received in the previous three years.

**c) Program Evaluations:**

*Divestiture Review:* There has been a decrease from 17 to 4 expected divestiture reviews each year.

**16. Plans for Tabulation and Publication**

**a) Requests to the Commission**

Staff has no plans to publish any tabulations of the submitted information.

**b) Consumer Reporting Systems**

The agency posts annual Data Books based on aggregate data from consumer reports about fraud, identity theft, and other business practices on the FTC.gov website, at <https://www.ftc.gov/enforcement/data-visualizations/explore-data>. The information in these reports includes the total number of reports by state and top report categories. There is also a counterpart annual analysis of National Do Not Call Registry consumer reports. The agency may also create ad hoc reports containing the aggregated data for specific industry sectors or geographic regions, consumer age, or other details. The agency also provides visualizations, reports, application programming interface endpoints, and datasets online at <https://www.ftc.gov/news-events/data-visualizations>.

**c) Program Evaluations**

*Divestiture Review.* Staff does not anticipate tabulating results of the divestiture follow-ups for publication.

**17. Display of the Expiration Date for OMB Approval**

Not applicable. The expiration date will be displayed on relevant forms.

**18. Exceptions to the Certification for Paperwork Reduction Act Submissions**

The FTC certifies that this collection of information is consistent with the requirements of 5 C.F.R. § 1320.9, and the related provisions of 5 C.F.R. § 1320.8(b)(3), and is not seeking an exception to these certification requirements.