

**Supporting Statement  
Comptroller's Licensing Manual  
OMB Control No. 1557-0014**

**A. Justification.**

The information collection requirements ensure that national banks and federal savings associations (FSA) (hereafter “bank” or “banks”) conduct their operations in a safe and sound manner and in accordance with applicable federal banking statutes and regulations. The information is necessary for regulatory and examination purposes.

The Manual sets forth the OCC's policies and procedures for the formation of a bank or federal branch or agency, entry into the federal banking system by other institutions, and corporate expansion and structural changes by existing banks. The Manual includes sample documents to assist the applicant in understanding the types of information the OCC needs to process a filing. An applicant may use the format of the sample documents or any other format that provides sufficient information for the OCC to act on a particular filing, including the OCC's Central Application Tracking System (CATS) electronic filing system.

Updates to Collection

The OCC adopted a final rule that increases the transparency of the standards that apply to the agency's review of business combinations involving national banks and Federal savings associations. In particular, the rule amends the agency's procedures for reviewing applications under the Bank Merger Act and adds, as an appendix, a policy statement that summarizes the principles the OCC uses when it reviews proposed bank merger transactions under the Bank Merger Act. The final rule amends 12 CFR 5.33 by removing the expedited review procedures in section 5.33(i), which currently allow an application to be deemed approved by the OCC as of the 15th day after the close of the comment period, unless the OCC notifies the filer that the filing is not eligible for expedited review, or the expedited review process is extended. The rule also removes the streamlined application in section 5.33(j), which would remove the ability of eligible institutions to file for certain types of business combinations using a streamlined application form.

**1. Circumstances that make the collection necessary:**

The Manual contains all required procedures, sample forms, and regulations regarding OCC corporate approvals. The Manual is needed to standardize the OCC's processing of corporate filings, to ensure consistency in the recordkeeping and decision-making processes, and to provide information regarding the criteria generally considered by the OCC in reviewing a corporate filing.

The Manual contains the following booklets:

- Articles of Association, Charter, and Bylaw Amendments
- Background Investigations
- Branch Closings

- Branches and Relocations
- Business Combinations
- Capital and Dividends
- Change in Bank Control
- Changes in Directors and Senior Executive Officers
- Changes of Corporate Title and Address
- Charters
- Conversions to Federal Charter
- Failure Acquisitions
- Federal Branches and Agencies
- Fiduciary Powers
- General Policies and Procedures
- Management Interlocks
- Mutual to Stock Conversions
- National Bank Director Waivers
- Public Notice and Comments
- Subordinated Debt
- Subsidiaries and Equity Investments
- Substantial Asset Changes, Including Changes in Charter Purpose
- Termination of Federal Charter

The following are the elements of this collection of information:

- (a) Background Investigations** – OCC regulations require the OCC to perform background investigations on proposed organizers, executive officers, directors, and principal shareholders of banks to determine if they have the experience, competence, integrity, character, financial ability, and willingness to direct or lead a bank's affairs in a safe, sound, and legal manner.

The OCC needs this information to accomplish these statutorily required background investigations. As part of its background investigations, the OCC performs standard background checks through the Internal Revenue Service Tax Check Program and through fingerprint checks with the Federal Bureau of Investigation.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 21, 22, 24(Seventh), 26, 27, 92a, 93a, 1464(e)(1), 1814(b), 1816, 1817, and 2903.

Regulations: 12 CFR 5.20, 5.50, 5.51, and 163.33; 28 CFR 16.34 and 20.33.

- (b) Public Notice and Comments** – OCC regulations require an applicant to publish a public notice of its filing in a newspaper of general circulation in the community in which the applicant proposes to engage in business and maintain a public file.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 1 *et seq.*, 93a, 1817(j), and 18 U.S.C. 1001.

Regulations: 12 CFR 5.8, 5.9, 5.10, 5.11, and 5.50.

- (c) Charter Documents**

- (1) Charter – The OCC must approve the establishment of a bank. The application is the single comprehensive source of information pertinent to the decision on an applicant's request. Each bank director must execute an oath.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 21, 22, 24(Seventh), 26, 27, 92a, 93a, 1464(a), 1814(b), 1816, and 2903.  
Regulations: 12 CFR 5.20 and 7.2008.

- (2) Corporate Organization – Federal law also requires that an existing or organizing bank forward to the OCC its corporate organizational documents. The OCC's public website contains examples of the most common types of resolutions and amendments to articles of association, charter, proxy cards, bylaws, and an organization certificate.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 21, 21a, and 1461 *et seq.*  
Regulations: 12 CFR 5.20, 5.21, 5.22, 5.25, and 5.33.

- (3) Banker's Bank – OCC regulations require that a banker's bank seeking a waiver of a statutory provision must request the waiver in a letter to the OCC. The letter must include information on why the waiver is requested and supporting legal analysis. This information is necessary to make a determination as to whether a waiver should be granted.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 1 *et seq.* and 27.  
Regulation: 12 CFR 5.20.

- (d) **Conversion Documents** – Institutions must request OCC permission to convert to a bank. OCC regulations require that a converting financial institution provide information related to its request to convert its charter. The OCC needs this information to determine whether to grant permission.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 1 *et seq.*, 35, 214a, 214b, 214c, and 1464(i).  
Regulations: 12 CFR 5.23 and 5.24.

- (e) **Federal Branches and Agencies** – OCC regulations require that a foreign bank desiring to establish a Federal branch or agency file an application or notice with the OCC. Prior to approval, the OCC must consider the potential effect on competition in domestic and foreign commerce in the United States, the financial and managerial resources and future prospects of the applicant foreign bank and the branch or agency, and the convenience and needs of the community to be served. The OCC needs this information to consider the required decision factors in the statute.

The following statute and regulations apply:

Statute: 12 U.S.C. 3101 *et seq.*  
Regulations: 12 CFR 5.70; 12 CFR part 28.

- (f) **Branches and Relocations** – A bank must obtain prior approval or give notice to the OCC to establish, acquire, or relocate a main office or branch. This section contains required requests and other information essential to the OCC's decision-making process.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 1-42, 93a, 1464, 2901-2907, 16 U.S.C. 470 *et seq.*, 42 U.S.C. 4321 *et seq.*

Regulations: 12 CFR 5.30, 5.31, 5.40, 5.52, and 145.91; 36 CFR 800.1 *et seq.*, 40 CFR 1500.1 *et seq.*

- (g) **Business Combinations and Failure Acquisitions** – OCC approval is required for any merger, corporate reorganization, or acquisition of a failed institution that will result in a bank. The applications provide necessary information relative to the OCC's decision-making process.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 24 (Seventh), 93a, 181, 214a, 214b, 215, 215a, 215a-1, 215a-2, 215a-3, 215c, 1462, 1462a, 1463, 1464, 1467a, 1815(a), 1815(d)(3), 1828(c), 1831u, 2901, 2903, Sec. 102 Pub. L. No. 103-328, and 1464(d)(2) & (3).

Regulations: 12 CFR 5.32 and 5.33.

- (h) **Fiduciary Powers** – OCC approval is required for a bank to exercise fiduciary powers. The request letter represents the bank's conformity with the governing statute and its commitment to retain qualified trust management. Additionally, a bank shall file a notice after opening a trust office in a state other than its home office state. This notice provides the OCC with the location of the bank's trust offices for supervisory purposes.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 92a, 12 U.S.C. 1464(n).

Regulation: 12 CFR 5.26.

(i) **Investment in Subsidiaries and Equities**

- (1) **Operating Subsidiaries** – OCC regulations require that a bank obtain OCC approval prior to establishing, acquiring, or performing new activities in an operating subsidiary. In certain instances, a national bank may file a notice after commencing an operating subsidiary activity. The application or notice provides the OCC with needed information regarding the activities and location(s) of the operating subsidiary.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 24(Seventh), 93a, and 1828(m).

Regulations: 12 CFR 5.34, 5.38, and 5.58.

- (2) **Financial Subsidiaries** – A national bank must obtain the approval of the OCC prior to acquiring control of, or holding an interest in, a financial subsidiary and prior to commencing a new activity in an existing financial subsidiary. A national bank that intends to acquire control of, or hold an interest in, a financial subsidiary, or to commence a new activity in an existing financial subsidiary, may obtain OCC approval through filing a certification with subsequent notice or a combined certification and

notice. The notice provides the OCC with needed information to determine whether the national bank satisfies the factors set forth in the statutes and regulation regarding financial subsidiaries.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 24a, 15 U.S.C. 6801.

Regulation: 12 CFR 5.39.

- (3) Bank Service Companies – OCC regulations require that a bank must obtain the prior approval of the OCC to invest in a bank service company. OCC regulations also require that a bank notify the OCC prior to its investment in certain bank service companies. The OCC needs this information to consider its decision.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 93a, 1861 to 1867, and 1843(c)(8).

Regulation: 12 CFR 5.35.

- (4) Investments – OCC regulations require a national bank that wishes to invest in an agricultural credit corporation, an eligible savings association, or any other equity investment authorized by statute after February 12, 1990, to provide notice to the appropriate OCC district office. The regulation also requires that a national bank or a Federal branch making a non-controlling investment, directly or through an operating subsidiary, file a written notice or application. The regulations further require an FSA making a pass-through investment, directly or through its operating subsidiary, to file an after-the-fact notice or an application. The OCC uses the information to make its decision.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 24(Seventh) and 93a.

Regulations: 12 CFR 5.36 and 5.58.

- (5) Thrift Service Corporations – OCC regulations require that an FSA obtain OCC approval prior to establishing or acquiring a subsidiary or performing new activities in a thrift service corporation. The application provides the OCC with needed information regarding the activities and location(s) of the service corporation.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 1464(c)(4)(B) and 1828(m).

Regulation: 12 CFR 5.59.

- (j) **Branch Closings** – Federal law requires a bank to notify the OCC if it closes a branch or if it converts a brick-and-mortar branch to an ATM branch. The notice serves as the OCC's primary method for gathering information necessary to cancel branch certificate numbers and update its database.

The following statute applies: 12 U.S.C. 1831r-1.

- (k) **Termination of National Bank or FSA Charter** – OCC regulations require a bank to notify the OCC of its intent to voluntarily liquidate, merge out, or convert out of the bank

charter. The notice or application serves as the OCC's primary method for gathering information necessary to make decisions on such filings, as applicable, and to update its database.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 93a, 181, 182, 2901 *et seq.* 12 U.S.C. 1464(d)(3)(A).

Regulations: 12 CFR 5.25, 5.33(k), and 5.48.

- (l) **Capital and Dividends; Subordinated Debt** – Federal law and OCC regulations require that a bank obtain OCC approval or, in some cases, provide notice to the OCC in connection with a change in equity capital, an issuance or prepayment of subordinated debt, and the payment of dividends under certain circumstances. These applications are necessary for the OCC's decision-making processes.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 21a, 51, 51a, 51b, 51b-1, 52, 56, 57, 59, 60, and 93a.

Regulations: 12 CFR 5.45, 5.46, 5.47, 5.55, 5.56, 5.60, 5.61, 5.62, 5.63, 5.64, 5.65, 5.66, and 5.67.

- (m) **Change in Control** – Any individual, group, or company that proposes to acquire control of a bank must submit prior notice of that intent to the OCC. The OCC uses the information to make its decision.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 93a and 1817(j).

Regulation: 12 CFR 5.50.

- (n) **Change in Senior Executive Officer and Director** – Whenever a change in control occurs, the bank must promptly report to the appropriate federal banking agency any changes or replacements of its senior executive officer or of any director occurring in the next 12-month period. Also, prior notice and approval is required for any additions to the board of directors or senior executive officers if: the bank is not in compliance with minimum capital requirements; is otherwise in troubled condition; or after OCC review of the plan required under section 38 of the Federal Deposit Insurance Act, the OCC determines that prior notice is appropriate.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 1817(j), 1831i, 5412(b)(2)(B).

Regulations: 12 CFR 5.50(h) and 5.51.

- (o) **Director Waivers** – Every national bank director must be a citizen of the United States and a majority of the directors of a national bank must reside in the state where the bank is located. The OCC may waive the requirement of citizenship for not more than a minority of the total number of directors and the residency requirement for a majority or all of the directors. A national bank may file a letter requesting a waiver of the citizenship or residency requirements. The OCC needs this information to make an informed decision.

The following statute and regulation apply:

Statute: 12 U.S.C. 72.

Regulation: 12 CFR 5.43.

- (p) **Change of Corporate Title and Address** – OCC regulations require a bank that changes its corporate title or address to inform the OCC of that change. The filing serves as the OCC's primary method for gathering the information to keep the bank databases up to date.

The following statutes and regulations apply:

Statutes: 12 U.S.C. 21a, 22, 30, 31, 93a, 161 and 481.

Regulations: 5.42 and 5.52.

- (q) **Management Interlocks** – Banks may apply to the OCC for exemption from the prohibitions on management interlocks that would not result in a monopoly or substantial lessening of competition and would not present safety and soundness concerns. The OCC needs the information in the application to grant appropriate exemptions that foster competition between unaffiliated institutions.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 3201-3208.

Regulation: 12 CFR 26.6.

- (r) **Customer Satisfaction Survey** – This survey is conducted as part of the OCC's quality assurance program. The OCC uses this information to evaluate its efforts in meeting its continuing goal of providing the best service possible to individuals and banks that file corporate applications. The OCC reviews each voluntary survey returned by an applicant to evaluate agency efforts to improve customer satisfaction and provide the best possible corporate activity services.

- (s) **Substantial Asset Change** – OCC regulations require a bank to obtain prior written approval for: a change in the composition of all, or substantially all, of the bank's assets, either through the sale or other disposition of assets; once having disposed of all or substantially all the assets, reactivates its operations through the subsequent purchase, acquisition, or other expansion of its operations; any other purchases, acquisitions or other expansions of operations that are part of a plan to increase the size of the bank by more than 25 percent in a one year period; any other material increase or decrease in the size of the bank or a material alteration in the composition of the types of assets or liabilities of the bank; or any change in the purpose of the bank's charter. The OCC needs this information to assess the impact of the transaction on the safety and soundness of the bank and its effect on the bank's customers.

The following statutes and regulation apply:

Statutes: 12 U.S.C. 93a and 1818.

Regulation: 12 CFR 5.53.

## ***2. Use of the information:***

Bankers and other interested parties use the Manual to determine where and how to file an application and to identify the legal requirements affecting corporate changes. Bankers, other interested persons, and OCC personnel use the Manual to further their understanding of corporate activities filing processes and timeframes. The Manual is the primary procedural guide

for OCC personnel.

The information collected through the notifications and forms assists the OCC in fulfilling its statutory and regulatory responsibilities as a supervisor. The OCC uses the information to evaluate the controlling owners, senior officers, and directors of the insured depository institutions subject to their oversight.

The uses of these collections of information are as follows:

(a) Background Investigations:

Interagency Biographical and Financial Report – The OCC uses the biographical information to evaluate the competence, experience, character, integrity, and financial ability of the persons proposed to serve as organizers, senior executive officers, directors, or principal shareholders. The OCC uses the financial information to evaluate the financial ability of persons proposed to serve as organizers, executive officers, directors, or principal shareholders.

(b) Public Notice and Comments – Public and consumer groups use this public notice to determine if they wish to offer comments about a bank’s regulatory performance. The OCC takes into consideration comments submitted from the public in its decision-making process.

(c) Charters – The OCC uses the application to determine whether to grant a request to organize a bank. A group requesting approval to organize a bank uses the sample application and business plan to ensure that they submit all information needed to evidence compliance with legal requirements. By analyzing the information submitted, OCC can make a decision based on whether all legal requirements are met and how changes affect the proposal.

The OCC uses the corporate organization submissions to ensure that all amendments are lawful and that the shareholders have authorized the necessary amendments. Bankers use the sample charter, bylaws, resolutions, amendments, and certification of articles of association as models of how to advise the OCC of changes to the articles of association, charter, or bylaws of a bank.

The OCC uses the waiver request letter to determine whether to grant a waiver to a banker’s bank. The Manual requires the minimal amount of information necessary for the OCC to consider the request and render a decision.

(d) Conversions – The OCC uses the application to determine whether to grant or deny a financial institution’s request to convert to a bank.

(e) Federal Branches and Agencies – The OCC uses the application to decide whether to approve a request from a foreign bank to establish a Federal branch or agency or to make a non-controlling equity investment. The information enables the OCC to analyze factors such as proposed directors and principal officers, capital structure, the effects on



competition, convenience and needs of the community, community reinvestment plans, and environmental impact. Bankers use the samples as guides for the submission of required information.

- (f) Branches and Relocations – The OCC uses the various branch applications and branch and main office relocation applications to evaluate the proposed expansion for legal and prudent purposes.
- (g) Business Combinations and Failure Acquisitions – The OCC uses the various applications to decide whether to grant or deny a bank’s proposal to combine with or acquire another depository institution.
- (h) Fiduciary Powers – The OCC uses the application letter to determine whether to grant or deny a bank’s request to exercise fiduciary powers.
- (i) Investment in Subsidiaries and Equities:
  - (1) Operating and Financial Subsidiaries – The OCC uses the application or notice to determine if the proposed activity is permissible for national bank and FSA operating subsidiaries and national bank financial subsidiaries.
  - (2) Bank Service Companies – The OCC uses the application to determine if the bank’s investment in a bank service company is permissible.
  - (3) Investments – The OCC uses the application or notice to determine if the proposed activity is authorized for banks, Federal branches, and their subsidiaries.
  - (4) Thrift Service Corporations – The OCC uses the application or notice to determine if the FSA’s investment in a service corporation and the activity of the service corporation are permissible.
- (j) Branch Closings – The OCC uses the notice to update its listing of the number of branch offices operated by banks and to test compliance with certain statutory requirements, such as the CRA, which must be met before the OCC can approve various types of corporate activities.
- (k) Termination of National Bank or FSA Charter – The OCC uses the termination notice to monitor the orderly closing, merger out, or charter conversion of a bank.
- (l) Capital and Dividends; Subordinated Debt – The OCC uses the application to determine whether to grant or deny a request to change capital or the issuance or prepayment of any subordinated debt. The OCC uses the various notifications to determine that the change occurred and whether it complied with legal and regulatory requirements.
- (m) Change in Control – The OCC uses the notice to decide whether to approve or disapprove a proposed acquisition using the regulatory decision criteria, including future prospects.
- (n) Change in Senior Executive Officer or Director – The OCC uses the notice to monitor

any change in management officials or members of the board of directors.

- (o) Director Waivers – The OCC uses the notice to determine whether to grant a request for a waiver of the requirements.
- (p) Change of Corporate Title and Address – The OCC uses this information to maintain current records for regulatory and supervisory mailings.
- (q) Management Interlocks – The OCC uses the information to assess whether a proposed management interlock is permitted under statute or eligible for an exemption under section 2210(c) of the Economic Growth and Regulatory Paperwork Reduction Act of 1996 and whether it has an anticompetitive effect.
- (r) Customer Satisfaction Survey – The OCC uses survey information to identify areas where it can improve its processing of corporate applications and service to banks. OCC personnel use the information to identify problem areas and to analyze, as appropriate, the practices and procedures in those areas. Further, OCC personnel use the information to design improved methods, as applicable.
- (s) Substantial Asset Change – The OCC uses the information to assess impact to the bank's safety and soundness and any effect on customers.

### ***3. Consideration of the use of improved information technology:***

As of 2017, all banks can submit an application or notice to the OCC via a secure Web-based electronic application system, CATS. Aside from certain documents that require an original signature, notary, or bank seal, all required information can be provided electronically in CATS. CATS also auto-populates certain bank information further reducing burden.

### ***4. Efforts to identify duplication:***

Each submission is unique to the situation of the individual bank. The procedures in the Manual support the use, wherever possible, of information that is already available to the OCC. For example, in business combinations, a streamlined procedure has been initiated to use Call Reports on file as well as the records available at the OCC for existing bank managers and directors. Because the OCC does not require a bank to submit information in any particular format, in some circumstances, an institution may determine that it has prepared similar information for another purpose. The OCC will accept any filing that clearly provides the required information. The OCC may accept an application form submitted to another federal agency if the application contains substantially the same information that the OCC requires. An applicant also may incorporate by reference any material contained in any other application filed with the OCC provided the material is attached to the application and is current and responsive to the information requested. The filing must clearly indicate that the information is incorporated by reference and include a citation to the information incorporated.

### ***5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.***

The burden for this collection has been reduced to the minimum possible under the governing

statutes and regulations and in keeping with OCC's supervisory responsibilities. Only the information necessary for the OCC to fulfill its statutory and regulatory responsibilities for any bank, regardless of size, is requested.

**6. Consequences to the federal program if the collection were conducted less frequently:**

The information is collected infrequently—only as the situations arise. Statutory or regulatory requirements govern these information collections. Less frequent collection is inconsistent with the underlying statutes and would not promote a safe and sound banking system.

**7. Special circumstances necessitating collection inconsistent with 5 CFR part 1320:**

N/A.

**8. Efforts to consult with persons outside the agency:**

The OCC issued a notice of proposed rulemaking in the *Federal Register* on February 13, 2024, 89 FR 10010. The comments received appear to relate to the PRA addressing burden and cost following the removal of the expedited review procedures in section 5.33(i) and the streamlined application in section 5.33(j). Some commenters opposed eliminating the expedited review procedures. These commenters argued that eliminating the expedited review procedures would unnecessarily increase the complexity and cost of the application process for categories of transactions that are unlikely to present issues under the Bank Merger Act, such as reorganizations.

Further, many commenters expressed concern that removing § 5.33(i) would increase the burden on smaller institutions, including community banks. Some of these commenters suggested that the OCC continue to allow expedited processing for banks under a certain size. Many commenters also opposed eliminating the streamlined application. Commenters stated that it is easy to complete and generally more efficient. Commenters stated that its removal would lead to longer processing times and higher costs for applicants.

Several commenters emphasized that eliminating the streamlined application would disproportionately affect smaller banks, which often have limited resources to devote to a more complex, administratively burdensome, and detailed application process. Commenters critical of eliminating the streamlined application focused on the increased burden associated with the Interagency Bank Merger Act Application.

The OCC believes that the more complete record created with the Interagency Bank Merger Act Application provides the appropriate basis for the OCC to consider a business combination application. Further, the removal of the streamlined business combination form should not significantly increase the burden on applicants. Although the Interagency Bank Merger Act Application requires the submission of additional information with the initial application, in practice, the OCC often requests additional information from many applicants, including those that file a streamlined application. Eliminating the streamlined application may decrease the likelihood the OCC requests additional information from applicants, which slows down the agency's processing an application and increases the burden on applicants. Further, the OCC may tailor the information applicants must submit in the Interagency Bank Merger Act Application as appropriate to reduce the information that the applicant needs to provide.

In response to these comments, the OCC has revised the number of small entities that will be impacted by this rulemaking (this change is reflected in the agency’s Regulatory Flexibility Act discussion in the final rule). Further, the OCC’s process for reviewing business combination applications allows the agency to vary the information that applicants must submit on a case-by-case basis and to request additional information not required on the initial application, if necessary. The OCC also may remove an application from expedited review if it needs additional review time. Accordingly, the OCC expects these changes will have a *de minimis* impact on small entities.

**9. Payment or gift to respondents:**

None.

**10. Any assurance of confidentiality:**

The information collected is kept confidential to the extent permitted by law.

**11. Justification for questions of a sensitive nature:**

Not applicable. No personally identifiable information is collected.

**12. Burden estimate:**

<b>Information Collection</b>	<b>No. of Respondents</b>	<b>No. of Responses</b>	<b>Hours per Response</b>	<b>Estimated Total Burden</b>
(a) Background Investigations (Interagency Biographical and Financial Report)	450	450	4.50	2,025
(b) Public Notice and Comments	burden is included in specific activity			
(c)(1) Charter Documents	2	2	250.00	500
(c)(2) Corporate Organization	73	73	0.45	33
(d) Conversion Documents	5	5	4.00	20
(e) Federal Branches and Agencies	5	5	37.30	187
(f) Branches & Relocations; Transfer of A/L	1,072	1,072	1.48	1,587
(g) Business Combinations and Failure Acquisitions	151	151	31.00	4,681
(h) Fiduciary Powers	14	14	3.10	43
	2	2	27.00	54
(i)(1) Operating Subsidiaries	136	136	1.00	136
(i)(2) Financial Subsidiaries	4	4	1.00	4
(i)(3) Bank Service Companies	1	1	1.00	1
(i)(4) Investments	9	9	1.00	9
(i)(5) Thrift Service Corporations	1	1	0.15	0.15

(j) Branch Closings	983	983	1.00	983
(k)(l) Termination of National Bank or FSA Charter	65 43	65 43	3.58 24.00	233 1,032
(l) Capital & Dividends; Subordinated Debt	176	176	2.00	352
(m) Change in Control	10	10	30.50	305
(n) Change in CEO and Director	1	1	2.00	2
(o) Director Waivers	25	25	2.00	50
(p) Change of Corporate Title & Address	233	233	0.22	51
(q) Management Interlocks	2	2	7	14
(r) Customer Satisfaction Survey	205	205	0.30	62
(s) Substantial Asset Change	26	26	4.50	117
<b>Total Estimated Burden</b>				<b>12,481.15</b>

<b>Information Collection</b>	<b>Wage Category</b>	<b>Total Burden Hours</b>	<b>Burden Hours by Wage Category</b>	<b>Wage Rate</b>	<b>Total Cost of Hour Burden</b>
(a) Background Investigations (Biographical and Financial Report)	100% sr mgmt	2,025	2,025	\$80	\$162,000
(c)(1) Charter Documents	30% clerical	500	150	\$20	\$3,000
	20% middle mgmt		100	\$40	\$4,000
	35% sr mgmt		175	\$80	\$14,000
	15% counsel		75	\$100	\$7,500
(c)(2) Corporate Organization	80% clerical	33	26	\$20	\$520
	20% sr mgmt		7	\$80	\$560
(d) Conversion Documents	30% clerical	20	6	\$20	\$120
	20% middle mgmt		4	\$40	\$160
	35% sr mgmt		7	\$80	\$560
	15% counsel		3	\$100	\$300
(e) Federal Branches & Agencies	40% clerical	187	75	\$20	\$1,500
	40% middle mgmt		75	\$40	\$3,000
	20% sr mgmt		37	\$80	\$2,960
(f) Branches & Relocations	70% clerical	1,587	1,111	\$20	\$22,212
	30% middle mgmt		476	\$40	\$19,039
(g) Business Combinations and Failure Acquisitions	40% clerical	4,681	1,872	\$20	\$37,448
	10% middle mgmt		468	\$40	\$18,724
	10% sr mgmt		468	\$80	\$37,448
	40% counsel		1,872	\$100	\$187,240
(h) Fiduciary Activities	40% clerical	97	39	\$20	\$780
	40% middle mgmt		39	\$40	\$1,560
	10% sr mgmt		10	\$80	\$800
(i)(1) Operating	50% clerical	136	67	\$20	\$1,340

Subsidiaries	40% middle mgmt 10% sr mgmt		55 14	\$40 \$80	\$2,220 \$1,120
(i)(2) Financial Subsidiaries	50% clerical 40% middle mgmt 10% sr mgmt	4	2 1 1	\$20 \$40 \$80	\$40 \$40 \$80
(i)(3) Bank Service Companies	50% clerical 40% middle mgmt 10% sr mgmt	1	0.5 0.4 0.1	\$20 \$40 \$80	\$10 \$16 \$8
<b>Information Collection</b>	<b>Wage Category</b>	<b>Total Burden Hours</b>	<b>Burden Hours by Wage Category</b>	<b>Wage Rate</b>	<b>Total Cost of Hour Burden</b>
(i)(4) Investments	50% clerical 40% middle mgmt 10% sr mgmt	9	4 4 1	\$20 \$40 \$80	\$80 \$160 \$80
(i)(5) Thrift Service Corporations	100% middle mgmt	0.15	0.15	\$40	\$6
(j) Branch Closings	60% clerical 40% middle mgmt	983	590 393	\$20 \$40	\$11,800 \$15,720
(k) Termination of National Bank or FSA Charter	30% clerical 40% middle mgmt 20% sr mgmt 10% counsel	1,265	379 506 253 127	\$20 \$40 \$80 \$100	\$7,580 \$20,240 \$20,240 \$12,700
(l) Capital & Dividends; Subordinated Debt	30% clerical 30% middle mgmt 20% sr mgmt 20% counsel	352	106 106 70 70	\$20 \$40 \$80 \$100	\$2,112 \$4,224 \$5,632 \$7,040
(m) Change in Control	30% clerical 50% sr mgmt 20% counsel	305	91 153 61	\$20 \$80 \$100	\$1,830 \$12,200 \$6,100
(n) Change in SEO or Director	20% clerical 80% sr mgmt	2	0.40 1.60	\$20 \$80	\$8 \$128
(o) Director Waivers	20% clerical 80% sr mgmt	50	10 40	\$20 \$80	\$200 \$3,200
(p) Change of Corporate Title & Address	80% clerical 20% middle mgmt	51	41 10	\$20 \$40	\$820 \$400
(q) Management Interlocks	50% clerical 50% counsel	14	7 7	\$20 \$100	\$140 \$700
(r) Customer Satisfaction Survey	80% clerical 20% middle mgmt	62	50 12	\$20 \$40	\$1,000 \$480
(s) Substantial Asset Change	40% clerical 10% middle mgmt 20% sr mgmt 30% counsel	117	47 12 23 35	\$20 \$40 \$80 \$100	\$940 \$480 \$1,840 \$3,500
<b>Total Cost of Hour</b>		<b>12,481.15</b>			<b>\$671,885</b>

<b>Burden to Respondents</b>					
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**13. Estimate of total annual costs to respondents:**

Not applicable.

**14. Estimate of annualized costs to the federal government:**

Not applicable.

**15. Changes in burden:**

There is no material change in burden. The removal of the streamlined application would not result in a substantive impact on the information collected as the streamlined application and the interagency BMA application requests the same categories of information and require applicants to evaluate the same elements of their application and business operations. Therefore, there is no material change in burden.

**16. Information regarding collections whose results are planned to be published for statistical use:**

The results of these collections will not be published for statistical use. However, data obtained from these submissions may be published in the OCC's Quarterly Journal; we present only the number of requests received.

**17. Display of expiration date:**

Not applicable.

**18. Exceptions to certification statement:**

Not applicable.

**B. Collections of Information Employing Statistical Methods:**

Not applicable.