

SUPPORTING STATEMENT  
FOR THE PAPERWORK REDUCTION ACT  
INFORMATION COLLECTION SUBMISSION FOR FORM T-4

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Section 304(c) of the Trust Indenture Act of 1939 (“Act”) permits the Securities and Exchange Commission (“Commission”) to exempt securities from requirements of the Act if such securities are issued under an indenture under which the securities were outstanding when the Act was adopted in 1939 and were still outstanding on January 1, 1959. It must be shown that compliance with a particular provision of the Act would require the consent of holders of securities outstanding under the indenture at the time of the application or would impose an undue burden on the issuer, having due regard to the public interest and the interest of investors. Under Rule 4c-1 (17 CFR 260.4c-1), issuers may file a Form T-4 (17 CFR 269.4) to apply for an exemption pursuant to Section 304(c) of the Act.

2. Purpose and Use of the Information Collection

As noted above, Form T-4 is used by issuers to apply for an exemption pursuant to Section 304(c) of the Act.

3. Consideration Given to Information Technology

Form T-4 is filed electronically with the Commission on the Electronic Data Gathering, Analysis, and Retrieval (“EDGAR”) system.

4. Duplication of Information

Form T-4 contains information regarding the status of an issuer and its securities under Section 304(c) of the Act. No similar information exists.

5. Reducing the Burden on Small Entities

Form T-4 is not filed by small entities.

6. Consequences of Not Conducting Collection

Form T-4 is filed only once and similar information is non-existent. Furthermore, fewer collections would eliminate a basis for an exemptive order under Section 304(c) of the Act.

7. Special Circumstances

There are no special circumstances.

8. Consultations with Persons Outside the Agency

No comments were received on this request during the 60-day comment period prior to OMB's review on this submission.

9. Payment or Gift to Respondents

No payment or gift has been provided to any respondents.

10. Confidentiality

Form T-4 is a public document.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this collection of information. The information collection collects basic Personally Identifiable Information (PII) that may include name, job title, and work address. However, the agency has determined that the information collection does not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier. In accordance with Section 208 of the E-Government Act of 2002, the agency has conducted a Privacy Impact Assessment (PIA) of the EDGAR system, in connection with this collection of information. The EDGAR PIA, published on February 18, 2025, is provided as a supplemental document and is also available at <https://www.sec.gov/privacy>.

12. Estimate of Respondent Reporting Burden

**Estimated Reporting Burden**

Information Collection Title	OMB Control Number	Number of Responses	Burden Hours
Form T-4	3235-0107	3	3

For purposes of the Paperwork Reduction Act ("PRA"), we estimate that Form T-4 takes approximately 5 hours per response to comply with the collection of information requirements and is filed by approximately 3 respondents annually. We further estimate that 20% of the collection of information burden is carried by the filer internally and that 80% of the burden of preparation is carried by outside professionals retained by the filer to assist in the preparation of the form. Based on our estimates, we estimate that 20% of the 5 hours per response (1 hour) is prepared by the filer for a total annual reporting burden of 3 hours (1 hour per response x 3 responses). For administrative convenience, the presentation of the total related to the paperwork burden hours has been rounded to the nearest whole number.

We derived our burden hour estimates by estimating the average number of hours it would take the filer to issue securities under an indenture to compile the necessary information and data, prepare and review disclosure, file documents and retain records. In connection with rule amendments to the form, we occasionally receive PRA estimates from public commenters about incremental burdens that are used in our burden estimates. We believe that the actual burdens will likely vary among individual companies based on the size and complexity of their organization and the nature of their operations. The burden hours estimate is made solely for the purpose of the PRA.

13. Estimate of Total Annualized Cost Burden

**Estimated Cost Burden**

Information Collection Title	OMB Control Number	Number of Responses	Cost Burden
Form T-4	3235-0107	3	\$7,200

We estimate that 80% of the 5 hours per response (4 hours) is prepared by the filer's outside professionals. We estimate an hourly cost of \$600 for outside professional services used in connection with public company reporting. This estimate is based on our consultations with registrants and professional firms who regularly assist registrants in preparing and filing disclosure documents with the Commission. Our estimates reflect average burdens, and therefore, some companies may experience costs in excess of our estimates and some companies may experience costs that are lower than our estimates. We estimate the total annual cost to be \$7,200 (\$600 x 4 hours x 3 responses annually). For administrative convenience, the presentation of the total related to the paperwork cost burden has been rounded to the nearest dollar. The cost estimate is made solely for the purpose of the PRA.

14. Costs to Federal Government

The annual cost of reviewing and processing disclosure documents, including registration statements, post-effective amendments, proxy statements, annual reports and other filings of operating companies amounted to approximately \$131,724,880 in fiscal year 2023, based on the Commission's computation of the value of staff time devoted to this activity and related overhead.

15. Reason for Change in Burden

**Summary of the Change in Burden Hours and Cost Burden**

IC Title	Annual No. of Responses			Annual Time Burden (Hours)			Annual Burden Cost Burden (\$)		
	Previously Approved	Requested	No change in No. of responses	Previously Approved	Requested	No change In Burden	Previously Approved	Request Cost burden	Increase In Cost Burden
Form T-4	3	3	0	0	0	0	\$4,800	\$7,200	\$2,400

The increase of \$2,400 in cost burden is due to an adjustment. The Commission increased the cost burden per hour estimate from \$400 per hour to \$600 per hour for outside professionals.

16. Information Collection Planned for Statistical Purposes

The information collection is not planned for statistical methods.

17. Approval to Omit Expiration Date

We request authorization to omit the expiration date on the electronic version of the form. Including the expiration date on the electronic version of the form will result in increased costs, because the need to make changes to the form may not follow the application's scheduled version release dates. The OMB control number will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for PRA submissions.

B. STATISTICAL METHODS

The information collection does not employ statistical methods.