SUPPORTING STATEMENT FOR NEW AND REVISED INFORMATION COLLECTIONS

OMB CONTROL NUMBER 3038-0091

Disclosure and Retention of Certain Information Relating to Cleared Swaps Customer Collateral

Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Section 724(a) of the Dodd-Frank Wall Street Reform and Consumer Protection Act, P.L. 111-023, 124 stat. 1376, amended the Commodity Exchange Act ("CEA"), 7 U.S.C. §§ 1 *et seq*., to add, as Section 4d(f) thereof, provisions concerning the protection of collateral provided by a Cleared Swaps Customer[1] to margin, guaranty, or secure a swap cleared by or through a derivatives clearing organization ("DCO"). For purposes of this supporting statement, the term "collateral" will be used to refer specifically to collateral subject to CEA Section 4d(f) and the term "customer" will be used to refer specifically to customers involved in cleared swaps transactions. Broadly speaking, in cleared swaps transactions customers provide collateral to futures commission merchants ("FCMs") through whom they clear their transactions. FCMs, in turn, may provide customer collateral to DCOs, through which FCMs clear transactions for their customers. In some circumstances one FCM ("Depositing FCM") may provide customer collateral to another FCM ("Collecting FCM") in connection with the process of clearing swaps transactions. If a customer defaults on an obligation arising out of a swap transaction the relevant FCM or DCO, in appropriate circumstances, may apply customer collateral to meet the defaulted obligation.

The requirements imposed by CEA Section 4d(f) include:

1. The FCM must treat and deal with all collateral (including accruals thereon) deposited by a customer to margin its cleared swaps as belonging to such customer;

2. The FCM may not commingle such collateral with its own property and may not, with certain exceptions, use such collateral to margin the cleared swaps of any person other than the customer depositing such collateral;

3. A DCO may not hold or dispose of the collateral that an FCM receives from a customer to margin cleared swaps in any manner that would indicate that such collateral belonged to the FCM or any person other than the customer; and

4. The FCM and the DCO may only invest such collateral in enumerated investments.

[1] For the definition of Cleared Swaps Customer, *see* Commission Regulation 22.1. 17 C.F.R. § 22.1.

17 C.F.R. Part 22 is intended to implement CEA Section 4d(f). Several of the sections of Part 22 require collections of information.

Commission Regulation 22.2(g) requires each FCM with Cleared Swaps Customer Accounts[2] to compute daily the amount of Cleared Swaps Customer Collateral[3] on deposit in Cleared Swaps Customer Accounts, the amount of such collateral required to be on deposit in such accounts and the amount of the FCM's residual financial interest in such accounts. The computations and supporting data must be kept in accordance with Commission Regulation 1.31, which establishes generally applicable rules for recordkeeping under the CEA. The purpose of this collection of information is to help ensure that FCMs' Cleared Swaps Customer Accounts are in compliance at all times with statutory and regulatory requirements for such accounts.

Commission Regulation 22.5(a) requires an FCM or DCO to obtain, from each depository with which it deposits Cleared Swaps Customer Collateral,[4] a letter acknowledging that such funds belong to the Cleared Swaps Customers of the FCM, and not the FCM itself or any other person. The purpose of this collection of information is to confirm that the depository understands its responsibilities with respect to protection of cleared swaps customer funds.

Commission Regulation 22.11 requires each FCM that intermediates cleared swaps for customers on or subject to the rules of a DCO, whether directly as a clearing member or indirectly through a Collecting FCM, to provide the DCO or the Collecting FCM, as appropriate, with information sufficient to identify each customer of the FCM whose swaps are cleared by the FCM. Commission Regulation 22.11 also requires the FCM, at least once daily, to provide the DCO or the Collecting FCM, as appropriate, with information sufficient to identify each customer's portfolio of rights and obligations arising out of cleared swaps intermediated by the FCM. The purpose of this collection of information is to facilitate risk management by DCOs and Collecting FCMs, and, in the event of default by the FCM, to enable DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis.

Commission Regulation 22.12 requires that each Collecting FCM and DCO, on a daily basis, calculate, based on information received pursuant to Commission Regulation 22.11 and on information generated and used in the ordinary course of business by the Collecting FCM or DCO, and record certain information about the amount of collateral required for each Cleared Swaps Customer and the sum of these amounts. As with Commission Regulation 22.11, the purpose of this collection of information is to facilitate risk management by DCOs and Collecting FCMs, and, in the event of default by the FCM, to enable DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis.

Commission Regulation 22.16 requires that each FCM who has Cleared Swaps Customers disclose to each of such customers the governing provisions, as established by DCO

[2] For the definition of Cleared Swaps Customer Account, *see* Commission Regulation 22.1. 17 C.F.R. § 22.1.
[3] For the definition of Cleared Swaps Customer Collateral, *see* Commission Regulation 22.1. 17 C.F.R. § 22.1.
[4] Commission Regulation 22.5(c) provides an exception for a DCO serving as a depository where such DCO has made effective rules that provide for the segregation of Cleared Swaps Customer Collateral in accordance with all relevant provisions of the CEA and the regulations thereunder. 17 C.F.R. § 22.5(c).

rules or customer agreements between collecting and depositing FCMs, relating to use of customer collateral, transfer, neutralization of the risks, or liquidation of cleared swaps in the event of a default by a Depositing FCM relating to a Cleared Swaps Customer Account. The purpose of this collection of information is to ensure that Cleared Swaps Customers are informed of the procedures to which accounts containing their swaps collateral may be subject in the event of a default by their FCM.

Commission Regulation 22.17 requires that each FCM produce a written notice of the reasons and the details concerning withdrawals from a Cleared Swaps Customers Account not for the benefit of Cleared Swap Customers if such withdrawal will exceed 25% of the FCMs residual interest in such account.

2. Indicate how, by whom, and for what purpose the data would be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The data required to be compiled and maintained pursuant to Commission Regulation 22.2(g) would be and is being used by FCMs (and, in some instances, the CFTC and self-regulatory organizations) to help ensure that FCMs' Cleared Swaps Customer Accounts are in compliance at all times with statutory and regulatory requirements for such accounts.

The data required to be obtained and maintained pursuant to Commission Regulation 22.5(a) would be and is being used by FCMs and DCOs (and, in some instances, the CFTC and self-regulatory organizations) to confirm that depositories of cleared swaps customer funds understand their responsibilities with respect to the protection of such funds.

The data required to be provided by FCMs to DCOs and Collecting FCMs pursuant to Commission Regulation 22.11 would be and is being used by DCOs and Collecting FCMs to facilitate risk management, and, in the event of default by an FCM, to enable DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis.

The data required to be calculated and maintained pursuant to Commission Regulation 22.12 would be and is being used by DCOs and Collecting FCMs to facilitate risk management, and, in the event of default by an FCM, to enable DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis.

The data required to be provided to customers pursuant to Commission Regulation 22.16 would be and is being used by such customers to inform themselves of the procedures to which accounts containing their swaps collateral may be subject in the event of a default by their FCM.

The data required to be provided by FCMs to DCOs and Collecting FCMs (and, in some instances, the CFTC and self-regulatory organizations) pursuant to Commission Regulation 22.17 would be and is being used by DCOs and Collecting FCMs to facilitate risk management, and, in the event of default by an FCM, to enable DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The collections of information required by Commission Regulations 22.2(g), 22.11, 22.12 and 22.17 may be conducted electronically. It is expected that this would be done using, with some modifications to software, information technology and systems already used by the relevant businesses.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The collections of information do not duplicate any existing collection of information. No laws or regulations requiring similar collections of information involving the relevant entities currently exist.

5. If the collection of information involves small business or other small entities, describe the methods used to minimize burden.

This collection of information will not have a significant impact on a substantial number of small entities.

6. Describe the consequence to the Federal Program or policy activities if the collection were conducted less frequently as well as any technical or legal obstacles to reducing burden.

If the collection of information required by Commission Regulation 22.2(g) were performed less frequently, it would not effectively serve the function of helping to ensure that FCMs' Cleared Swaps Customer Accounts are in compliance at all times with statutory and regulatory requirements for such accounts. If the collections of information required by Commission Regulations 22.11 and 22.12 were performed less frequently, they would not effectively serve the function of facilitating timely risk management by DCOs and Collecting FCMs and, in the event of default by an FCM, enabling DCOs and Collecting FCMs to perform their duty, pursuant to Commission Regulation 22.15, to treat the collateral attributed to each customer of the FCM on an individual basis quickly enough to minimize market disruption and losses due to market volatility. If the collection of information required by Commission Regulation 22.5(a) were conducted less frequently, it would be less effective in helping to ensure that funds belonging to the Cleared Swaps Customers of FCMs are at all times held by depositories that understand their legal responsibilities with regard to such funds. If the collections of information required by Commission Regulations 22.16 and 22.17 were conducted less frequently, they would be less effective in ensuring that Cleared Swaps Customers are informed of the procedures to which accounts containing their swaps collateral may be subject in the event of a default by their FCM.

7. Explain any special circumstances that require the collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**

Less frequent reporting and recordkeeping would not permit the Commission, or the self-regulatory organizations subject to its oversight, to adequately administer the CFTC's customer protection rules consistently with their purpose, which is supported fully by the CEA as amended, or monitor for compliance with the Part 22 regulations that have been implemented consistently with the CEA, as amended.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:**

Less frequent reporting and recordkeeping would not permit the Commission, or the self-regulatory organizations subject to its oversight, to adequately administer the CFTC's customer protection rules consistently with their purpose, which is supported fully by the CEA as amended, or monitor for compliance with the Part 22 regulations that have been implemented consistently with the CEA, as amended.

- **requiring respondents to submit more than an original and two copies of any document;**

Respondents are not required to submit more than an original and two copies of any documents to the Commission or third parties.

- **requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

Commission Regulation 1.31 expressly requires that:

> All books and records required to be kept by the [CEA] or by [Commission] regulations shall be kept for a period of five years from the date thereof and shall be readily accessible during the first 2 years of the five-year period. All such books and records shall be open to inspection by any representative of the Commission or the United States Department of Justice.

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

Not applicable.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Not applicable.

- **that includes a pledge of confidentiality that is not supported by authority established in statue or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

The collection does not involve any pledge of confidentiality.

- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The Commission has procedures to protect the confidentiality of an applicant's or registrant's data. These are set forth in the Commission's regulations at Parts 145 and 147 of title 17 of the Code of Federal Regulations.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any, and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Commission published a Federal Register notice on August 06, 2026, requesting comments on the information collection. *See* 91Fed. Reg. 50817(Aug. 06, 2026). The Notice provided a 60-day period during which the public was invited to comment on the information collection and the burdens imposed by it. The Commission received two relevant comments on the 60-Day Notice.[5] One commenter argued that the current reporting framework is outdated and structurally deficient, and suggested the Commission modernize its information collection requirements.[6] While revisions to the reporting framework for Part 22 would ultimately revise the burden estimates in this notice, revising the current reporting framework is beyond the scope of this renewal. Another commenter supported renewing this collection because daily collateral

[5] Comments are available for public review at https://www.regulations.gov.
[6] Comment Letter from Mak Conan, CFTC-2026-1684-0003, available at: https://www.regulations.gov/comment/CFTC-2026-1684-0003.

calculations, customer-level records, and depository acknowledgments are essential to safeguarding customer assets and to performing orderly default management.[7] The commenter urged the Commission to provide standardized, non-identifying public summaries of collateral sufficiency and compliance issues, strengthen disclosure and reporting practices, and ensure burden estimates are transparent and validated. The Commission acknowledges the commenter's recommendation for additional public disclosures. The Commission notes, however, that it publishes extensive information regarding firms' financial condition and the amount of customer funds held in segregation. In determining the scope of publicly available information, the Commission has balanced the benefits of disclosure with the potential risk that the publication may undermine market integrity and/or compromise customer confidentiality. Based on these considerations, the Commission has determined not to further expand the content of the publicly available information at this time.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

This question does not apply. The Commission has neither considered nor made any payment or gift to a respondent.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

The Commission does not provide respondents with an assurance of confidentiality beyond that provided by applicable law. The Commission fully complies with Section 8(a)(1) of the CEA, which strictly prohibits the Commission, unless specifically authorized by the CEA, from making public "data and information that would separately disclose the business transactions or market positions of any person and trade secrets or names of customers." The Commission has procedures to protect the confidentiality of a respondent's data set forth in Part 145 of the Code of Federal Regulations.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The regulations covered by this collection do not require the provision of sensitive information, as that term is used in Question 11.

12. Provide estimates of the hour burden of the collection of information. The Statement should:

[7] Comment Letter from Michelle Maher, CFTC-2026-1684-0004, available at: https://www.regulations.gov/comment/CFTC-2026-1684-0004.

- **Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than ten) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

- **If the request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

- **Provide estimates of annualized cost to respondents for the hours burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

See Attachment A.

In light of the current number of Commission-registered FCMs and DCOs, the total number of respondents is estimated to be 95 (71 FCMs and 24 DCOs) and the aggregate hour burdens set forth below are based upon that estimate. The burden hours are not anticipated to vary widely among respondents.

The annualized costs per affected registrant and in the aggregate were determined using an average salary of $135 per hour. The Commission believes that this is an appropriate salary estimate for purposes of this regulation.

In support of this determination, the Commission notes that the salary estimate is based upon May 2025 Bureau of Labor Statistics' findings of National Occupation Employment and Wage Estimates, United States,[8] including the mean hourly wage of an employee under occupation code 23-1011, "Lawyers," that is employed by the "Securities, Commodity Contracts, and Other Financial Investments and Related Activities Industry," which is $131.91; the mean hourly wage of an employee under occupation code 11-3031, "Financial Managers," in the same industry, which is $124.46; and the mean hourly wage of an employee under occupation code 13-1041, "Compliance Officers" in the same industry, which is $51.71. The Commission also notes that, the Commission took the foregoing data and then increased its hourly wage estimate in recognition of the fact that some respondents may be large financial institutions whose employees' salaries may exceed the mean wage. The Commission recognizes that some respondents may hire outside counsel with expertise in the various regulatory areas covered by the combined final regulations and that outside counsel may be able to leverage its expertise to substantially reduce the number of hours needed to fulfill a requested assignment. While the Commission is uncertain about the billing rates that these respondents may pay for outside counsel, the Commission believes that such counsel may bill at a rate of several hundred dollars per hour. Any determination to use outside counsel, however, is at

[8] *See http://www.bls.gov/oes/current/oes_nat.htm*.

the discretion of the respondent.

Recordkeeping

Based on the Commission's experience the recordkeeping and disclosure required by Commission Regulation 22.2(g) is expected to require about 100 hours annually per entity, for a total burden of approximately 7,100 hours. At an hourly rate of $135 per hour, the cost burden would be approximately $13,500 per entity per year for a total of $958,500. Also based on our experience the recordkeeping requirement of Commission Regulation 22.5 is expected to require about 5 hours per entity per year, for a total burden of approximately 475 hours per year. At an hourly rate of $135 per hour, the cost burden would be approximately $675 annually per entity, for a total of $64,125.

The recordkeeping required by Commission Regulation 22.11 involves information that FCMs that intermediate swaps generate and use in the usual and customary ordinary course of their business. It is expected that the required disclosure will be performed using automated data systems that FCMs maintain and use in the usual and customary ordinary course of their business but that certain additional functionality will need to be added to these systems to perform the required disclosure. Because of the novel character of Commission Regulation 22.11, it is not possible to make a precise estimate of the paperwork burden. We estimate that the necessary modifications to, and maintenance of, systems may require approximately 20 hours of work annually at a salary of approximately $135 per hour. It is expected that the required recordkeeping will be performed by approximately 71 FCM entities. The total annual burden for Commission Regulation 22.11 therefore is estimated at 1,420 hours and $191,700.

The recordkeeping required by Commission Regulation 22.12 involves information that Collecting FCMs and DCOs will receive pursuant to Commission Regulation 22.11 or that they generate and use in the usual and customary ordinary course of their business. It is expected that the required recordkeeping will be performed using automated data systems that Collecting FCMs and DCOs maintain and use in the usual and customary ordinary course of their business but that certain additional functionality will need to be added to these systems to perform the required disclosure. Because of the novel character of Commission Regulation 22.12, it is not possible to make a precise estimate of the paperwork burden. We estimate that the necessary modifications to, and maintenance of, systems may require approximately 25 hours of work annually at a salary of approximately $135 per hour. It is expected that the required recordkeeping will be performed by approximately 95 entities (71 FCMs and 24 DCOs). The total annual burden for Commission Regulation 22.12 therefore is estimated at 2,375 hours and $320,625.

Similarly, based on experience, the recordkeeping and disclosure required by Commission Regulation 22.17 is expected to require about 60 hours annually per entity, for a total burden of approximately 4,260 hours. At an hourly rate of $135 per hour, the cost burden would be approximately $8,100 per entity per year for a total of $575,100.

Third-Party Disclosure

The required disclosure in Commission Regulation 22.16 would have to be made once each time a swaps customer begins to be cleared through a particular DCO or collecting FCM and each time a DCO or collecting FCM through which a customer's swaps are cleared changes it polices on the matters covered by the disclosure. It is expected that each disclosure would require about 0.2 hours of staff time by staff with an estimated salary of $135 per hour. It is uncertain what average number of swaps customers FCMs will have, and what average number of disclosures will be required for each customer annually. Assuming an average of 500 customers per FCM and two disclosures per customer per year, the estimated total annual burden would be 200 hours and $27,000, per entity, for an overall burden of $1,917,000.

Based upon the above, the total annual responses are estimated to be 134,605 and the total annual burden hours is estimated to be 29,830 hours. The estimated average burden hours per respondent is 314 hours (29,830 hours / 95 respondents). The estimated total annual burden cost is $4,027,050.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components; (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major costs factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software, monitoring, sampling, drilling and testing equipment, and record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate, agencies may consult with a sample of respondents (fewer than ten), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The Commission has accounted for the information collection costs associated with this collection in its response to the Question above. There are no additional start-up or operations and maintenance costs associated with this collection.

14. Provide estimates of the annualized costs to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The collection of information is not expected to impose significant annual costs on the Federal Government because it principally involves a requirement for certain private parties to keep records and make disclosures to other private parties with whom they do business.

15. Explain the reasons for any program changes or adjustments.

There are no program changes. In connection with this renewal, the Commission has updated its estimates to reflect the current number of affected respondents. Specifically, the Commission's estimate of the total number of covered respondents has been increased from 75 to 95 (71 FCMs and 24 DCOs). As a result of this change, the overall burden estimate under this clearance has been increased from 25,050 to 29,830annual burden hours.

16. For collection of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This question does not apply. There are no plans to publish any information obtained through these information collections for statistical use.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

This question does not apply.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions."

This question does not apply.

Attachment A

OMB Collection File 3038-0091

ANNUAL ESTIMATED BURDENS

RECORDKEEPING BURDEN

1.	2.	3.	4.	5.	6.	7	8.	9.	10.
Regulations (17 CFR)	**Estimated number of respondents**	**Estimated annual responses per entity**	**Estimated number of hours per response**	**Estimated Burden Hours per Respondent (3×4)**	**Estimated Average Burden Hour Cost**	**Total Avg Burden Hour Cost per Respondent (5×6)**	**Total annual responses (2×3)**	**Total annual burden-hours (2×5)**	**Total annual burden-cost (2×7)**
22.2(g)	71 (FCMs)	250	0.4	100	$135	$13,500	17,750	7,100	$958,500
22.5(a)	95 (71 FCMs, 24 DCOs)	1	5	5	$135	$675	95	475	$64,125
22.11	71 (FCMs)	250	0.08	20	$135	$2,700	17,750	1,420	$191,700
22.12	95 (71 FCMs, 24 DCOs)	250	0.1	25	$135	$3,375	23,750	2,375	$320,625
22.17	71 (FCMs)	60	1	60	$135	$8,100	4,260	4,260	$575,100
Total Recordkeeping Burden	**95**						**63,605**	**15,630**	**$2,110,050**

THIRD-PARTY DISCLOSURE BURDEN

1.	2.	3.	4.	5.	6.	7	8.	9.	10.
Regulations (17 CFR)	**Estimated number of respondents**	**Estimated annual responses per entity**	**Estimated number of hours per response**	**Estimated Burden Hours per Respondent (3×4)**	**Estimated Average Burden Hour Cost**	**Total Avg Burden Hour Cost per Respondent (5×6)**	**Total annual responses (2×3)**	**Total annual burden-hours (2×5)**	**Total annual burden-cost (2×7)**
22.16	71 (FCMs)	1,000	0.2	200	$135	$27,000	71,000	14,200	$1,917,000

Total Estimated Burden for Information Collection 3038-0091

Estimated number of respondents: 95.

Estimated total annual number of responses: 134,605.

Estimated total annual burden hours: 29,830.

Estimated total annual burden cost: $4,027,050.