

SUPPORTING STATEMENT FOR NEW AND REVISED INFORMATION COLLECTIONS

OMB CONTROL NUMBER 3038-0005

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.

The Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) was signed into law on July 21, 2010. The legislation was enacted to reduce risk, increase transparency, and promote market integrity within the financial system by, inter alia, enhancing the Commission’s rulemaking and enforcement authorities with respect to all registered entities and intermediaries subject to the Commission’s oversight. The Dodd-Frank Act has expanded the scope of federal financial regulation to include instruments such as swaps, enhanced the rulemaking authorities of existing federal financial regulatory agencies including the Commission and the Securities and Exchange Commission (“SEC”), and created new financial regulatory entities.

The Commodity Exchange Act (“CEA”) empowers the Commission with the authority to require commodity pool operators (CPOs) and commodity trading advisors (CTAs) to maintain books and records and to file reports as required by the Commission. The Commission also has the power to promulgate such regulations as it deems necessary to implement the purposes of the CEA.

Following the recent economic turmoil, and consistent with the tenor of the provisions of the Dodd-Frank Act, the Commission reconsidered the level of regulation that it believes is appropriate with respect to entities participating in the commodity futures and derivatives markets. Specifically, among other things, the Commission re-evaluated its prior decision to exclude from the definition of CPO those Registered Investment Companies (RICs) that conduct more than a de minimis level of commodity interest trading. Pursuant to the Final Rule: Commodity Pool Operators and Commodity Trading Advisors: Amendments to Compliance Obligations, all such RICS were required to register with the Commission See, 77 Fed. Reg. 11252 (Feb. 24, 2012); corrected at 77 Fed. Reg. 17328 (March 26, 2012). However, compliance with Part 4 of the Commissions regulations was deferred for these CPOs of RICs until the effectiveness of a final rule that harmonized to the extent possible the compliance obligations of the Commission with those of the SEC for dually registered entities.

The proposed rule to harmonize such compliance obligations was published in the Federal Register on February 24, 2012. See 77 Fed. Reg. 11345 (Feb. 24, 2012). The proposed

rule solicited public comments for a period of 60 days following the date of publication in the Federal Register (April 24, 2012). This final release is amending Collection 3038-0005 to accommodate the modified compliance obligations under part 4 of the Commission's regulations. The information collections in this rule would allow the Commission to fulfill its regulatory mandate while, at the same time, avoiding unnecessary regulatory burdens on dually-regulated CPOs of RICs with respect to disclosure, annual and periodic reporting to participants, and Commission recordkeeping requirements.

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 disclosure, filing, and recordkeeping requirements within Part 4 of the Commission's regulations were established to assist customers, to facilitate the Commission and NFA in monitoring compliance with the Part 4 rules, and to enable the Commission to better monitor the markets risks posed by the Commission's registrants. Failure to require the information in this collection would severely hamper these efforts. These records also provide the Commission with its source of independent aggregated financial information concerning the commodity pool industry, which informs the Commission's policy decision making.

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 Commission and NFA permit electronic filings to minimize the burden on registrants and to streamline the process of sending, receiving, and reviewing the filings. The Commission's Form CPO-PQR as required by Commission Regulation 4.27 is filed electronically with NFA.

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 premise of the Harmonization Rule was to effectively allow substituted compliance with part 4 of the Commission's regulations through compliance with the regime imposed by the SEC. That is, to the extent that a RIC is required to register with the Commission, the Commission will accept compliance by such entities with the disclosure, reporting, and recordkeeping regime administered by the SEC as substituted compliance with part 4 of the

Commission's regulations. However, the reporting required by Commission Regulation 4.27 has no SEC analog, and as such, will be required to be filed by RICs.

5. If the collection of information involves small business or other small entities (Item 5 of OMB Form 83-1), describe the methods used to minimize burden.

The Commission has established certain definitions of "small entities" to be used by the Commission in evaluating the impact of its rules on such entities in accordance with the RFA. The Commission determined that registered CPOs are not small entities for the purpose of the RFA.

However, Form CPO-PQR is designed to minimize burdens on smaller entities. The Form is divided into three Schedules (A, B and C) with each schedule only being required of progressively larger entities. Schedule A must be filed by all CPOs, and contains only simple identifying information as well as basic computational measures regarding the pools managed by the CPO. However, Schedule B must only be filed by those CPOs with assets over \$150 million. Schedule C is only required of those CPOs with more than \$1.5 billion in assets under management.

The Commission has previously decided to evaluate, within the context of a particular rule proposal, whether all or some CTAs should be considered to be small entities, and if so, to analyze the economic impact on them of any such rule. The sole aspect of the final rule that affects CTAs that are registered with the Commission is the timeframe that permits Disclosure Documents to be used for 12 months rather than 9 months, thereby reducing the frequency with which updates must be prepared. The Commission considers the reduced frequency with which these CTAs must prepare updates to their Disclosure Documents as reducing the overall burden on affected entities. Over the course of three calendar years, the change from a 9 month update period to a 12 month update period eliminates 1 filing per CTA. This results in a change from 1.33 filings per year to 1 filing per year. However, because the eliminated filing would be an update of a document that was already prepared and reviewed by NFA, the Commission does not believe that the eliminated filing would result in a significant economic impact. The amended time period for updating Disclosure Documents for CTAs also aligns this requirement with other regulatory obligations that registered CTAs must comply with, including the filing of form CTA-PR pursuant to § 4.27 of the Commission's regulations. The Commission believes that this will enable registered CTAs to avail themselves of operational efficiencies in satisfying its regulatory obligations as the information required under form CTA-PR is relevant to the preparation or updating of Disclosure Documents. Therefore, the Commission has determined that the final rule will not create a significant economic 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.

Failure to require Part 4's disclosures, filings, and recordkeeping could expose the investing public to greater opportunities for fraud and mismanagement by CPOs and CTAs and would make monitoring of these entities by the Commission and NFA less effective.

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;

The rules in question do not require the respondent to report any information to the Commission more often than quarterly.

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

Respondents are not required to prepare any written responses because all responses will be submitted electronically.

- 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 document.

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

Respondents must maintain certain records in order to demonstrate compliance with the Part 4 regulations. For enforcement purposes, Commission Rule 1.31 requires that:

All books and records required to be kept by the [Commodity Exchange] Act or by these regulations shall be kept for a period of five years from the date thereof and shall be readily accessible during the first two years of the five year period. All such books and records shall be open to inspection by any representative of the Commission or the U.S. 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;

The rules do not involve a statistical survey.

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

The rules do not involve the use of statistical data.

- that includes a pledge of confidentiality that is not supported by authority established in statute 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 rules do not involve a pledge of confidentiality that is not supported by authority established in statute or regulation.

- 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 rules involve submission of proprietary trade secrets to the Commission with respect to the information requested on Form CPO-PQR regarding position information, trading strategy, and stress testing. The Commission recently amended its regulation governing nonpublic records under Part 145 of the Commission's regulations to include the proprietary information on Form CPO-PQR. See 77 Fed. Reg. 11252.

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 C.F.R. 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.

The proposed harmonization rule was published in the Federal Register on February 24, 2012 (77 FR 11345) and solicited comment on the information collection and estimated burden hours on page 11350 of the release. The Commission received 66 comment letters regarding the provisions of the Proposal. The commenters could be broadly categorized as: trade and public interest organizations; family offices; a registered futures association; individuals; CPOs; registered investment companies; and law firms. Of those 66 comments, 19 commenters specifically addressed the harmonization effort for CPOs of RICs, with the remainder commenting on the advisability of adopting an exemption for family offices.

Commenters on the harmonization effort provided comments on the following compliance requirements: disclosure, including, but not limited to, the "break-even" disclosure, required statements of risk, and the cycle for updating disclosure documents; financial reporting,

including periodic account statements; books and records; broader applicability; and considerations of costs and benefits. These commenters generally believed that the proposed harmonization rule did not provide adequate relief to CPOs of RICs that would be required to register with the Commission due to the level of derivatives trading that the RIC engaged in either directly or indirectly. In particular, one commenter provided additional detailed information regarding estimated hour burdens and costs associated with compliance with the Commission's disclosure regime as proposed.

In response to the comments received, the Commission revised the provisions of the proposed rule, and instead of a "hybrid"-style compliance regime, wherein CPOs of RICs would be required to comply with the SEC's compliance regime and the Commission's where the two were not in conflict, the Commission has adopted a disclosure regime for CPOs of RICs that is effectively a substituted compliance regime. As such, CPOs of RICs that comply with the SEC's disclosure obligations, with some minor additional disclosure required by the Commission that do not conflict with limitations imposed by the SEC, will be deemed compliant with the disclosure regulations adopted by the Commission. The Commission further agreed to accept the filing of financial statements that are prepared pursuant to the SEC's governing statutes and regulations as compliant with the Commission's regulations.

Commenters also requested the ability to use third-party service providers for the maintenance of books and records. The Commission agreed that the requirement that books and records be kept at the main business address of the CPO should be liberalized for all CPOs. The Commission also extended the time period for updating disclosure documents for CPOs and CTAs from 9 months to 1 year, which would enable the registrants to take advantage of certain operational efficiencies.

With respect to the comment that provided detailed hour and cost estimates regarding compliance with part 4 of the Commission's regulations, the Commission considered the information provided and incorporated the submitted data into the section of the release considering the costs and benefits of the final rule.

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.

The Commission has consulted with staff from the SEC regarding their body of recordkeeping, reporting and disclosure requirements. Additionally, the Commission received substantial comments from affected persons regarding the appropriate scope, frequency, and intensity of these recordkeeping, disclosure and reporting requirements.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three 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.

No such circumstances occur with respect to this collection.

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

This question does not apply.

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

The Commission has provided no assurance of confidentiality above that provided by the Commission's Freedom of Information Act regulations, 17 C.F.R. Part 145, and Section 8 of the Commodity Exchange Act, 7 U.S.C. §12. Outside of the Freedom of Information Act and the Commodity Exchange Act, there is no basis for confidential treatment of any of the information governed by these rules.

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 giving of sensitive information, as the term is used in Question 11.

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

- 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 in Item 13 of OMB Form 83-I.
- 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.

The Commission provides the burden hours costs below for the initial costs and ongoing costs. The total burden hours costs below were obtained by first calculating the per-hour cost and then using this total to determine the per-entity initial aggregate cost by summing the per-entity initial costs of the provisions described below. Specifically, this final rule affects §§ 4.7(b)(4), 4.12(c), 4.12(d), 4.22(c), 4.23, 4.26 and 4.36. The amendments to §§ 4.26 and 4.36 will result in a reduction of the burden to CPOs and CTAs. Attachment A includes global estimates for Collection 3038-0005, including estimates for sections not affected by this rule. Estimates may not sum to total due to rounding effects.¹

Per entity initial burden hour costs:

Notice of Substituted Compliance, § 4.12(d) = (3 pools per sponsor) x (2 hours per pool) x (\$76.93 per hour) = \$461.58.

Inclusion of Past Performance, § 4.12(c) = (1 pool per sponsor) x (15 hours per pool) x (\$265 per hour) = \$3,975.00.

Submission of Annual Report, § 4.22(c) = (3 pools per sponsor) x (2 hours per pool) x (\$76.93 per hour) = \$461.58.

¹ The Commission staff's estimates concerning the wage rates are based on 2011 salary information for the securities industry compiled by the Securities Industry and Financial Markets Association ("SIFMA"). The \$76.93 per hour is derived from figures from a weighted average of salaries across different professions from the SIFMA Report on Management & Professional Earnings in the Securities Industry 2011, modified to account for an 1800-hour work-year, adjusted to account for the average rate of inflation in 2012, and multiplied by 1.3 to account for overhead and other benefits. The Commission anticipates that compliance with the part 4 provisions would require the work of an information technology professional (to provide necessary information); a compliance manager (to determine whether or not an entity is eligible for an exemption in accordance with the Commission's regulations); and an associate general counsel (to prepare notices of exemption). Thus, the wage rate is a weighted national average of salary for professionals with the following titles (and their relative weight); "programmer (senior)" (30% weight), "compliance manager" (45%), and "assistant/associate general counsel" (25%). The Commission uses this wage estimate in estimating costs for provisions that were not included in commenters' assessments of costs and benefits; for provisions that were included in the commenters' assessments of costs and benefits, the Commission utilizes the estimates provided by the commenters. All estimates have been rounded to the nearest hundred dollars.

Notice of Third Party Record-keeper, §§ 4.23, 4.7(b)(4) = (2 hours per sponsor) x (\$76.93 per hour) = \$153.86.

Total per-entity initial cost = (\$461.58) + (\$3,975.00) + (\$461.58) + (\$153.86) = \$5,052.02.

Aggregate initial cost-- obtained by multiplying the per entity hour costs times the number of entities for the provisions described below.

Notice of Substituted Compliance, § 4.12(d) = (461.58 per sponsor) x (418 sponsors) = \$192,940.44.

Inclusion of Past Performance, 4.12(c) = (\$3,975.00 per sponsor) x (368 sponsors) = \$1,462,800.00.

Submission of Annual Report, § 4.22(c) = (\$461.58 per sponsor) x (418 sponsors) = \$192,940.44.

Notice of Third Party Record-keeper, §§ 4.23, 4.7(b)(4) = (\$153.86 per operator) x (4,080 operators) = \$627,748.80.

Total aggregate initial cost = (\$192,940.44) + (\$1,462,800.00) + (\$192,940.44) + (\$627,748.80) = \$2,476,429.68.

Per-entity ongoing burden hour costs:

Inclusion of Past Performance, § 4.12(c) = (1 pool per sponsor) x (15 hours per pool) x (\$233 per hour) = \$3,495.00.

Submission of Annual Report, § 4.22(c) = (3 pools per sponsor) x (2 hours per pool) x (\$76.93 per hour) = \$461.58.

Total per-entity ongoing cost = (\$3,495.00) + (\$461.58) = \$3,956.58.

Aggregate ongoing costs-- obtained by multiplying the per entity hour costs times the number of entities for the provisions described below.

Inclusion of Past Performance, § 4.12(c) = (\$3,495.00 per sponsor) x (368 sponsors) = \$1,286,160.00.

Submission of Annual Report, § 4.22(c) = (\$461.58 per sponsor) x (418 sponsors) = \$192,940.44.

Total aggregate ongoing cost = (\$1,286,160.00) + (\$192,940.44) = \$1,479,100.44.

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 does not anticipate any start-up or capital costs associated with this collection. Because the compliance regime adopted for CPOs of registered investment companies is premised largely upon substituted compliance through compliance with the regime implemented by the SEC, the Commission does not anticipate any additional costs beyond those calculated in Question 12.

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 primary costs for reviewing and analyzing documents under this collection are the salaries and benefits of existing staff, including auditors and attorneys.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Following the recent economic turmoil, and consistent with the tenor of the provisions of the Dodd-Frank Act, the Commission reconsidered the level of regulation that it believes is appropriate with respect to entities participating in the commodity futures and derivatives markets. Specifically, among other things, the Commission re-evaluated its prior decision to exclude from the definition of CPO those Registered Investment Companies (RICs) that conduct more than a de minimis level of commodity interest trading. Pursuant to the Final Rule: Commodity Pool Operators and Commodity Trading Advisors: Amendments to Compliance Obligations, all such RICS were required to register with the Commission See, 77 Fed. Reg. 11252 (Feb. 24, 2012); corrected at 77 Fed. Reg. 17328 (March 26, 2012). However, compliance with Part 4 of the Commissions regulations was deferred for these CPOs of RICs until the effectiveness of a final rule that harmonized to the extent possible the compliance obligations of the Commission with those of the SEC for dually registered entities. The collection has been amended to reflect the harmonization efforts that will enable CPOs of RICs to comply with the Commission's compliance obligations within this collection.

The Commission is amending Collection 3038-0005 to increase the estimated total number of respondents, total annual responses for all respondents, and annual reporting burden from the estimates that appeared in the Proposal. These amendments are in response to comments that the Commission received regarding the burdens imposed by the Proposal and also reflect the differences between the Proposal and the final rule. Thus, the new total burden in the 2012 Final Rule associated with Collection 3038-0005 has increased to account for the burdens associated with the various information collections in this final rule. However, in the Proposal, the Commission inadvertently reflected the additional number of entities that were already included in the Commission's final amendment to Collection 3038-0005 associated with the 2012 Final Rule, and therefore, the additional amendments to Collection 3038-0005 in the Proposal resulted in those entities being erroneously double counted.

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.

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 Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exceptions exist.

Attachment A²

3038-0005 - Rules Relating to the Operations and Activities of Commodity Pool Operators and Commodity Trading Advisors and to Monthly Reporting by Futures Commission Merchants

	ESTIMATED # OF RESPONDENT S OR RECORD KEEPERS PER YEAR	POOLS BY EACH RESPONDENT	REPORTS ANNUALLY BY EACH POOL OR RESPONDENT, AS APPLICABLE	TOTAL ANNUAL RESPONSES	ESTIMATED AVERAGE NUMBER OF HOURS PER RESPONSE	ESTIMATED TOTAL NUMBER OF HOURS OF ANNUAL BURDEN IN FISCAL YEAR
REPORTING 4.12(b) (Exemption from Certain CPO Requirements)	10		1	10	0.5	5.00
4.12(d) (Notice by CPOs of registered investment companies)	418	3	1	1,254.00	2	2,508.00
4.12(c) (past performance disclosure for CPO of registered investment companies with less than 3 years performance)	368		1	368	15	5,520.00
4.14(a)(8) (Notice of Exemption from CTA Registration)	300		1	300	0.5	150.00
4.5 (Notice of	7,890.00		1	7,890.00	0.5	3,945.00

² This collection contains the burden estimates for provisions applicable to CPOs and CTAs, but which were not amended by this final rule.

Exclusion from CPO Definition)						
4.7 (Notice of Claim for Exemption for Pool Offered to QEPs)	3,900.00	1	1	3,000.00	0.5	1,500.00
4.7(b)(2) (QEP Pool Periodic Reports)	3,900.00	3	4	15,600.00	2	31,200.00
4.7(b)(3) (QEP Pool Annual Report)	3,900.00	3	1	3,900.00	9.58	37,362.00
4.13(a)(5) (Disclosures-Exempt CPOs) ³	3,612.00	1	1	3,612.00	0.5	1,806.00
4.13(c)(3) (Reporting-Exempt CPOs) ⁴	3,612.00	1	1	3,612.00	0.1	361.20
4.26 (CPO Disclosure Documents)	180		1.8	324	2.88	936.00
4.22(a) (Pool Account Statements)	180	1.5	9	2,430.00	3.85	9,355.50
4.22(c) (Pool Annual Reports)	180	1.5	1	270.00	9.58	2,586.60
4.22(c) (Registered Investment Company Annual Financial Statements)	418	3	1	418.00	2	836.00
4.36 (CTA Disclosure Documents)	45		1	450	1.85	832.50
1.33(d) (FCM Reports)	100		12	1,200.00	6	7,200.00

³ Renumbered, Rule 4.13(b)(1) in previous collection.

⁴ Renumbered, Rule 4.13(b)(2) in previous collection.

4.27					
Schedule A-Form CPO-PQR	4,060.00	1	4,060.00	8	32,480.00
Schedule B-Form CPO-PQR (Non-Large CPOs)	3,800.00	1	3,800.00	4	15,200.00
Schedule B-Form CPO-PQR (Large CPOs)	260.00	4	1,040.00	4	4,160.00
Schedule C-Form CPO-PQR	260.00	4	1,040.00	18	18,720.00
Schedule A-Form CTA-PR	450.00	1	450.00	0.5	225.00
SUBTOTAL REPORTING	38,228.00		53,772.00		176,888.80
RECORDKEEPING					
4.7(b)(4) (CPOs notices)	3,900.00	1	3,900.00	2	7,800.00
4.7(c)(2) (CTAs)	1,278.00	4	5,112.00	8	40,896.00
4.13(c)(1)(ii) (Exempt CPOs)	3,612.00	1	3,612.00	11.4	41,218.50
4.23 (CPOs of registered investment companies)	418	1	418	2	836.00
4.23 (CPOs notices)	180	1	180	2	360.00
4.33 (CTAs)	450	1	450	18	8,100.00
SUBTOTAL RECORDKEEPING	9,818.00		14,648.00		99,170.50
GRAND TOTAL	48,046.00		68,420.00		276,059.3