

Reporting and Recordkeeping Burden Hours for Persader Reporting

Form	Number of Reports Filed	Recordkeeping Burden for all reports (in minutes)	Total Recordkeeping Hours for all reports	Total Reporting burden for all reports (in minutes)	Total Reporting Hours for all reports	Total Burden for all reports (in minutes)
Form LM-20 (Revised Forms Submitted)	4194.44	62916.6	1048.61	348138.52	5802.30866667	411055.12
Form LM-10 (Revised Form Filers/Forms Submitted)	2777.04	69426	1157.1	338798.88	5646.648	408224.88
Total of Form LM-20 Filers						
Sub-total for number of law firms/consultants:	11.70968761	175.645314193	2.92742190321	971.904071867	16.1984011978	1147.5493861
	358.20255319149					
NOTE: Also, there is currently an error in footnote 103 of page 190 of the preamble: the estimates there are based on trade associations filing, instead of the law/consultant firms filing all the reports, including the seminar reports.						

Reporting and Recordkeeping Burden Hours and Costs for Persader Reporting

Form		Number of Reports	Reporting Minutes Per Respondent	Recordkeeping Minutes Per Respondent	Total Burden Minutes Per Respondent
Form LM-20					
Cost Per Form		4194.44	83.00	15.00	98.00
Cost Per Filer		11.70968761			
Form LM-10		2777.04	122	25.00	147.00
Annual Cost per Non-Filing Entity:	\$92.53				
Total Annual Cost for Non-Filing Entities:	\$3,636,320.73				
<p>*Form LM-20 average hourly salary for lawyers, \$64.17, is derived from the Occupational Employment and Wages Survey for May 2014, Table 1 on page 12, from the Bureau of Labor Statistics (BLS) at http://www.bls.gov/news.release/pdf/ocwage.pdf. The Department increased these figures by approximately 44.2.0% to account for total compensation to reach the average hourly compensation for attorneys for the purposes of this analysis: \$92.53. See Employer Costs for Employee Compensation Summary (03-11-15), from the BLS, at http://www.bls.gov/news.release/ecec.nr0.htm. The Department increased the average hourly wage rate for employees (\$21.72 in 2012) by the percentage total of the average hourly compensation figure (\$9.60 in 2012) over the average hourly wage.</p>					

Average Cost Per Respondent*	Total Cost	Increase Over Recent ICR Submission	Total Increase Over Recent ICR Submission	Increase Over NPRM	Total Increase Over NPRM
\$151.14	\$633,932.16	\$3.36	\$576,743.16	\$63.55	\$406,110.57
	\$1,769.76				
\$226.70	\$629,567.34	\$4.59	\$417,003.34	\$51.52	\$31,502.82
Total Cost of Rule for Filers:	\$1,263,499.50		\$993,746.50		\$437,613.39
			\$269,753.00		\$825,886.11
Total Cost of Rule:	\$4,899,820.23				

Summary of Form Persuader Regulatory Flexibility Analysis							
For Consultants that Meet the SBA Small Entities Standard					Total Cost per Response		Total Cost Per LM-20 Respondent
Year Cost of Form LM-20 Report							
Payroll Cost For Avg Consultant Firm				\$1,444,486	\$151.14		\$1,769.76
Percent of Average Annual Payroll					0.01046%		0.1225182%
Payroll Cost For Consulting Firm with 0-4 Employees				\$92,126.18	\$151.14		\$1,769.76
Percent of Average Annual Payroll					0.16%		1.9210163%
Non-Filers*							
For Non-Filing Firms with Avg. Consultant Firm					\$92.53		
Percent of Average Annual Payroll					0.0064%		
For Non-Filing Firms with Avg. Consultant Firm w					\$92.53		
					0.10%		
Year Cost of Form LM-10							
Payroll Cost for All Employers				\$945,530	\$226.70		
Percent of Average Annual Payroll					0.0240%		0.000239764424
Payroll Cost for All Employers with 1-4 Employees				\$67,126.88	\$226.70		
Percent of Average Annual Payroll					0.34%		
For Non-Filing Employers (10 minutes per year)					15.4220718232		
Percent of Annual Payroll					0.00326%		
Percent of Payroll for Employers with 1-4 Employees					15.4220718232		
					0.02297%		
Number of Small Entities		Filing Entities	Non-Filing Entities*				
Form LM-20		354.620528	39297.79745				
Form LM-10		2768.70888					
Total		3123.32941					
* The total cost for these non-filing entities is:				3636320.73			

Davis, Andrew - OLMS:
The source for all the NAICS data is the U.S. Census Bureau, Statistics of U.S. Businesses: 2012: Number of Firms, Number of Establishments, Employment, and Annual Payroll by Enterprise Employment Size for the United States, All Industries: 2012, released on 1/23/15, located at <http://www.census.gov/econ/subs/>. Saved as a spreadsheet on the Y Drive.

