

February 6, 2017

Legislative and Regulatory Activities Division  
Office of the Comptroller of the Currency

**Attn: 1557-0319**

400 7th Street, S.W., Suite 3E-218

Mail Stop 9W-11

Washington DC 20219

**Subject:** Company-Run Annual Stress Test Reporting Template and Documentation for Covered Institutions with Total Consolidated Assets of \$50 Billion or More Under Dodd-Frank Wall Street Reform and Consumer Protection Act

This letter is in response to the Office of the Comptroller of the Currency's (OCC) 30-day notice of the agency's intent to revise information collection despite the lack of practical utility and facts presented in public comments. Comments on the 30-day notice must be received by March 6, 2017.

**The Office of Management and Budget (OMB), and the Office of Information and Regulatory Affairs (OIRA) should RESCIND or REFUSE to renew an OMB Control Number.**

The OCC continues its tradition of ignoring public comments.

1. The OCC did not consider the new facts presented by the public as written in my December 9, 2016 comment letter. The OCC did not address any of the salient facts or questions in that letter.
2. The OCC abandoned the tradition of disclosing in the 30-day notice the total number of comment letters it received on the 60-day Federal Register notice. How many public comments were received?
3. The OCC's responses to commenter's facts, concerns and questions are perfunctory and phony. The OCC does not address the new facts or questions presented by the public.

OMB and OIRA should read my **December 9, 2016** comment letter and then read the OCC's 30-day notice and decide whether the OCC made a *bona fide* effort to consider all *germane* public comments.

It is unfortunate that the OCC treats the Administrative Procedures Act perfunctorily. Over the past year, the OCC has made no attempt to reduce unnecessary, duplicative burdens imposed by the federal agency.

When the OCC does not address substantial public comments, the public record is incomplete and the OCC creates the perception that it makes final decisions without considering the data, views, and arguments of others.

Sincerely,

Sandra A. Holly  
Hyattsville, MD