

March 7, 2017

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

Attn: 1557-0248

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

Mail Stop 9W-11

Washington DC 20219

Subject: **Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery**
(OMB Control No.: 1557-0248)

This letter is in response to the Office of the Comptroller of the Currency's (OCC) 30-day notice and request for public comment on information collected of qualitative feedback on agency service delivery. Comments must be received by April 6, 2017.

The OCC invites comments on whether the collection of the information is necessary for the proper performance of the OCC and whether the information has practical utility

The Office of Management and Budget (OMB), and the **Office of Information and Regulatory Affairs (OIRA)** should REFUSE to assign or renew an OMB Control Number because the information collection is a duplicate of OMB #1557-0199.

This collection of qualitative feedback on agency service delivery is duplicative and unnecessary. This collection is duplicative of information collected under OMB Control # 1557-0199.

On occasion, the OCC collects qualitative feedback from customers and stakeholders in its "Examination Questionnaire" collection allowed under OMB #1557-0199. Collection of information in the Examination Questionnaire is sufficient to achieve insights into customer and stakeholder perceptions, experiences, and expectations on OCC services – which is the purpose of the information collection in OMB #1557-0248. The OCC ignored public comments when it renewed OMB #1557-0199 (by not responding to the specific questions and facts presented in the public comments to the 60-day notice). I am confident that the agency will ignore public comments on this information collection as well.

Additionally, this 30-day notice states that this collection of qualitative feedback on agency service delivery will "... *[not] be used for the purpose of substantially informing influential policy decisions.*" The agency also writes that the information collected will not yield statistically reliable results. So question: If the information collected is not statistically reliable and will not be used to substantially inform policy decisions, then why collect the information? The United States government should only collect information that it will use in meaningful ways.

I appreciate the opportunity to comment. I wish the agency the best of luck.

Sincerely,

Sandra A. Holly
Hyattsville, MD