



CUNA & Affiliates

December 19, 2006

Information Collection Comments

Chief Counsel's Office

Office of Thrift Supervision

1700 G Street, NW

Washington, DC 20552

Filed via infocollection.comments@ots.treas.gov

Re: Application for Conversion, Request for
Comments on Proposed Information Collection
Activities

To Whom It May Concern:

This letter is in response to the Office of Thrift Supervision's Notice and Request for Comments on the Proposed Agency Information Collection Activities on Charter Conversions. The notice and request for comments appeared in the Federal Register on October 20, 2006.

As required by the Paperwork Reduction Act, 44 U.S. C. 3507, in order to obtain approval from the Office of Management and Budget for the continued use of application form (OTS Form 1582) for conversion from a national bank, commercial bank, state savings bank or credit union to a federal savings association, OTS is seeking public comments on information collected in connection with the charter application form.

The request for comments raises concerns which OTS should address. OTS states it is making technical, non-substantive changes to Form 1582 but does not describe or indicate what those changes are. In order to obtain useful comments from the public, OTS should have provided a more thorough description of what it plans to change in the form.

Also, while the Paperwork Reduction Act directs agencies to minimize the compliance burden associated with their information collection efforts, it also seeks to obtain "the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government."

In that connection, we question whether Form 1582 provides sufficient information for OTS to properly assess the impact of the conversion process on public interests, including the interests of the members of credit unions that apply to convert. OTS should reissue the notice and request for comments, or hold a public hearing, to solicit input from interested parties on the extent to which the information obtained under Form 1582 allows OTS to balance these interests.

Thank you for the opportunity to express our views on the notice and request for comments.

Sincerely,

A handwritten signature in cursive script that reads "Mary Mitchell Dunn".

Mary Mitchell Dunn
SVP and Deputy General Counsel