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Supporting Statement

A. Justification

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting number of deaths, injuries and economic losses resulting from motor vehicle crashes on the Nation's highways. In support of this mission, NHTSA proposes to conduct information collections to assess the effectiveness of interventions designed to increase safety belt use and reduce impaired driving. Specifically, NHTSA proposes to conduct a series of telephone surveys that will examine the effectiveness of multiple National and State *Click It or Ticket* mobilizations and impaired driving crackdowns, as well as examine the effectiveness of more localized demonstration projects designed to curb impaired driving and/or raise belt use. The National and State telephone surveys would be conducted during the mid 2006 to mid 2009 time period. Since Congress has authorized NHTSA to spend millions of dollars annually to conduct National and State mobilizations and smaller demonstration projects, NHTSA must account for whether these initiatives were effective. An essential part of this evaluation effort is to compare baseline and post-intervention measures of attitudes, intervention awareness, and (relevant) self-reported behavior to determine if the interventions were associated with changes on those indices.

The following sections describe the justification for these proposed studies in more detail, along with the estimates of burden.

A.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.

a. Circumstances making the collection necessary

The National Highway Traffic Safety Administration (NHTSA) was established to reduce the mounting number of deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. As part of this statutory mandate, NHTSA is authorized to conduct research as a foundation for the development of motor vehicle standards and traffic safety programs.

The heavy toll that impaired driving exacts on the nation in fatalities, injuries, and economic costs is well documented. Strong documentation also exists to show that many people continue to ignore one of the most important actions a person can take to prevent injury or fatality in the event of a crash, wearing a safety belt. The persistence of these traffic safety problems points to a continuing need for effective interventions to address impaired driving and non-use of safety belts. This, in turn, calls for strong evaluation efforts to identify what interventions are effective.

Combating impaired driving and raising safety belt use are key components of the Department of Transportation's strategic goal of safety by eliminating transportation-related deaths and injuries. The DOT performance goal is to reduce highway-related fatalities to no more than 1.0 per 100 million vehicle miles traveled (VMT) by the end of 2008. To reach this goal, NHTSA has established intermediate outcome measures, which include (a) reducing the rate of alcohol-related (0.01+ BAC) highway fatalities per 100 million VMT to 0.49 by 2007 and (b) increasing safety belt use to 83 percent by 2007. These goals are outlined in Section 4 of the NHTSA budget.

Recent federal legislation continues a dramatic increase in funding to support these efforts. In August, 2005, President Bush signed into law the "Safe, Accountable, Flexible, Efficient Transportation Act: A Legacy for Users" (SAFETEA-LU), which provides almost \$700 million dollars in occupant protection (Section 405) and alcohol impaired driving countermeasure (Section 410) incentive grants. This is in addition to the nearly \$1 billion dollars for the State and Community Highway Safety Grants Program (Section 402). The legislation places particular emphasis on enforcement activities. Among the new assurances required under Section 402 are supporting national highway safety goals, including national mobilizations; and conducting sustained enforcement of impaired driving, occupant protection, and speed. In addition, SAFETEA-LU separately provides more than \$100 million dollars for media expenditures to be applied to high visibility enforcement, with two high visibility enforcement campaigns annually (one for impaired driving and one for safety belts).

Telephone surveys have been necessary components of the evaluation of previous National and State enforcement campaigns such as "*Click it or Ticket*" and "*You Drink and Drive, You Lose*TM." For "*Click It or Ticket*" in particular, they have shown the campaign message penetrating public awareness, increased public perceptions of enforcement associated with the campaigns, and substantial elevation of campaign awareness and enforcement perceptions when paid media was used. This evaluation activity will continue to be important not just to monitor whether or not previously achieved effects are maintained by future mobilizations, but also to assess the impact of recent changes in the safety environment. For example, SAFETEA-LU is less prescriptive about the characteristics of the safety belt mobilizations than was the case under the former Section 157 grant program. It will be important to evaluate how greater allowed flexibility in the model being used affects the mobilization results. In addition, NHTSA will be changing the "*You Drink and Drive, You Lose*TM" message. Again, what will be the impact?

As safety gains become increasingly difficult to achieve, implementation and evaluation of demonstration projects will become increasingly important. Such projects will be critical to identifying new interventions that will be effective in reaching those people not influenced by the enforcement and mobilization activity that has been responsible for many of the preceding gains in safety belt use and reduction of impaired driving. As with the mobilization surveys, telephone surveys will be essential to determining if the interventions are reaching their targeted audiences, and influencing how those audiences are processing the interventions.

As the highway safety arm of the Department of Transportation, NHTSA has a responsibility to collect these data. NHTSA proposes to conduct a series of National and State telephone surveys to help evaluate mobilizations to enforce the safety belt and impaired driving laws, and to evaluate selected safety belt and anti-impaired driving demonstration projects. The surveys will be designed to determine if the interventions are penetrating public awareness, if they are influencing public attitudes and perceptions, and if they are associated with changes in relevant (self-reported) behavior. Combined with other behavioral measures (e.g., belt use observation surveys), they will enable NHTSA to evaluate the effectiveness of strategic interventions to raise belt use and reduce impaired driving, and whether the increased spending provided by SAFETEA-LU is producing the desired results.

b. Statute authorizing the collection of information

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter. (See Attachment A for full text)

A.2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The purpose of this information collection is to provide critical information needed by NHTSA to demonstrate effective countermeasures that meet the Agency's mandate to improve highway traffic safety. The collected data will be used to assist NHTSA in its ongoing responsibilities for: (a) reporting the effectiveness of program activities to Congress; (b) providing information to NHTSA's partners involved in improving public safety; and (c) providing sound scientific reports on NHTSA's activities to other public safety researchers.

The proposed National and State telephone surveys will provide NHTSA with data necessary to track the success of safety belt and impaired driving enforcement mobilizations, as well as provide effectiveness information on other demonstration

projects that use innovative methods to reduce impaired driving and/ or increase safety belt use. For each intervention, data collected prior to intervention implementation (baseline survey) will be compared to data collected at the conclusion of the intervention in order to detect any changes in attitudes, awareness, or reported behavior associated with the intervention. Where appropriate, one or more interim survey waves may be added so that data for different phases of intervention implementation can be compared.

The results of the analyses described above will be used by NHTSA to assess the effectiveness of the mobilizations (or other campaigns) and determine where refinements or resource adjustments are needed. Demographic data collected by the surveys will be used to identify if the interventions are having a differential impact across major population groups, and the nature of those differences.

Besides reporting this information to Congress, and further developing its own program and technical assistance activities, NHTSA will:

- Disseminate the information to State and local highway safety authorities, who will use it to develop, improve and target their own safety belt enforcement and alcohol enforcement programs and activities.
- Disseminate the information to citizen action groups and other organizations concerned with traffic safety issues, who will use it to develop, improve and target their own programs and activities.

A.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 information technology. Also describe any consideration of using information technology to reduce burden.

One hundred percent of the data will be collected electronically through the use of Computer Assisted Telephone Interviewing (CATI). The CATI system allows a computer to perform a number of functions prone to error when done manually by interviewers, including:

- Providing correct question sequence;
- Automatically executing skip patterns based on prior answers to questions (which decreases overall interview time and consequently the burden on respondents);
- Recalling answers to prior questions and displaying the information in the text of later questions;
- Providing random rotation of specified questions or response categories (to avoid bias);
- Ensuring that questions cannot be skipped; and
- Rejecting invalid responses or data entries.

The CATI system lists questions and corresponding response categories automatically on the screen, eliminating the need for interviewers to track skip patterns and flip pages.

Moreover, the interviewers enter responses directly from their keyboards, and the information is automatically recorded in the computer's memory.

CATI systems typically include safeguards to reduce interviewer error in direct key entry of survey responses. CATI also allows the computer to perform a number of critical assurance routines that are monitored by survey supervisors, including tracking average interview length, refusal rate, and termination rate by interviewer; and performing consistency checks for inappropriate combination of answers.

A.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.

For each intervention, data collected prior to intervention implementation (baseline survey) will be compared to data collected at the conclusion of the intervention in order to detect any changes in attitudes, awareness, or reported behavior associated with the selected safety belt and impaired driving interventions as they occur. The necessary connection of the timing of the data collection to the timing of the intervention implementation precludes there being available data that could be used instead. Because no data on these programs exists until it is collected, no other data source can be substituted.

A.5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The collection of information involves randomly selected individuals in their residences, not small businesses.

A.6. Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently.

The information is essential to the effective and efficient use of budgeted funds for programmatic activities. Congress requires NHTSA to report on these national mobilizations and demonstration projects to show that the appropriated funds are being used efficiently. Without information on attitudes, knowledge and behavior of the general public before and after the intervention efforts, it will be impossible to adequately interpret the value of these programmatic efforts to increase seat belt use and reduce impaired driving. As a consequence, NHTSA would be seriously hampered in its ability to determine if modification or redirection of the safety belt and impaired driving programs is warranted. Public safety could suffer and enormous amounts of federal funds be wasted as a result.

The timing of the mobilizations will determine the timing of the National and State telephone surveys. The evaluation approach will follow a basic pre/post design where data are collected immediately preceding and at the conclusion of the interventions. In certain cases, there may also be interim survey waves. The purpose of the interim waves

would be to assess how different phases of an intervention affected the targeted audiences. For example, a mobilization may begin with one or more weeks strictly of media, with police enforcement initiated during a subsequent week. An interim survey wave might be introduced to examine the impact of the media on the public prior to introduction of the enforcement component. Alternatively, a demonstration project may involve a series of independent activities over time. Interim survey waves might be used to evaluate one or more discrete activities within the project. Whether interim waves are utilized will depend on the importance to safety goals and funding decisions of determining the impact of selected activities on their intended audiences during the course of an intervention.

A.7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

A.8. Provide a copy of the FEDERAL REGISTER document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice (Vol. 70, No. 232, Pages 72500-72501) which announced NHTSA's intention to collect data is provided in Appendix B. The following comment on the Federal Register Notice, which was received on December 5, 2005, was submitted by Barb Sachau, of Florham Park NJ.

“spending taxpayer dollars on what is already known makes no sense at all. it is clear that some people chose not to wear seat belts. their insurance companies should make known to all policyholders that you don't recover full amounts if you don't buckle up. i think this spending is to gather information that is already known. i also think the money available should be spent on writing tickets for those who chose NOT to wear their seat belts. it would be more effective. enforcement is needed here, not more surveys which gather information already well known.”

This data collection supports enforcement efforts to increase safety belt use. Data from these surveys is needed to identify (a) groups of individuals that do not wear safety belt for targeted enforcement campaigns, and (b) to assess the effectiveness of these mobilizations.

A copy of a second Federal Register Notice (Vol. 71, No. 38, pages 9858-9859), which announced that this information collection request has been forwarded to OMB, is also provided in Appendix B.

EXPERT CONSULTATION: NHTSA staff designed the mobilization survey instruments based on the key characteristics of the “Click It or Ticket” and “You Drink and Drive. You Lose” Mobilizations. This included consultation with the States concerning characteristics of their mobilization activities and how they would be assessed. A copy of the safety belt and impaired driving mobilization questionnaires, which closely follow previously approved mobilization questionnaires (OMB 2127-0615; OMB 2127-0627) is provided in Appendix C. For the demonstration projects, survey contractors will work with the designers of the demonstration project interventions to devise the data collection instruments. An example of a previously approved safety belt demonstration project questionnaire is provided in Appendix C.

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

No payment or gifts will be offered to respondents for their participation in the surveys.

A.10. Describe any assurance of confidentiality provided to respondents

In the surveys’ introduction, respondents are informed that participation is voluntary, and their answers are anonymous and will be used only for statistical purposes. The contractor also delivers a database stripped of respondents’ telephone numbers, so it is impossible to identify participants’ names, addresses, telephone numbers, or social security numbers.

A.11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

We acknowledge that collecting information on drinking and driving is a sensitive issue for the public. However, this information is important to collect in order for NHTSA to determine the success of our programs. Given the sensitive nature of this information, our questions are phrased in a neutral/ nonjudgmental fashion.

A.12. Provide estimates of the hour burden of the collection of information on the respondents.

NHTSA estimates that respondents will require an average of ten minutes to complete the telephone interviews. Over a three year period, the proposed information collection will survey 72,000 respondents for 10 minutes each, which is a total of 12,000 interview hours. The total estimated burden for the three-year period is:

Year 1: 24,000 respondents X 10 minutes =	4,000 hours
Year 2: 24,000 respondents X 10 minutes =	4,000 hours
Year 3: 24,000 respondents X 10 minutes =	4,000 hours
Total Burden:	12,000 hours

Since respondents will be contacted at home, the survey will not be an actual cost to the respondents (i.e., they will be participating during non-salaried hours). However, the time they spend on the survey can still be looked at in terms of what it would have cost if the respondents had spent that amount of time on a task while on the job. Based on median per capita income (Table P-1 from CPS Population and Per Capita Money Income, All Races: 1967 to 2004.” Source: U.S. Census Bureau, Housing and Household Economic Statistics Division Last Revised: January 13, 2006), the total respondent cost for the annual survey period would be:

$$\$11.92 \text{ per hour} \times 4,000 \text{ interviewing hours} = \$47,680$$

The total respondent cost for the full three-year survey period would be:

$$\$11.92 \text{ per hour} \times 12,000 \text{ interviewing hours} = \$143,040$$

The following components – national, state and demonstration project surveys - are included within these total estimates:

National Surveys

SEC. 2009 of Public Law 109-59 (SAFETEA-LU) directed NHTSA to evaluate two National high-visibility traffic safety law enforcement campaigns annually. These annual mobilizations are the “Click It or Ticket” (CIOT) safety belt enforcement mobilization in May and an alcohol mobilization (formerly known as “You Drink and Drive. You Lose”) in August and September. Telephone surveys are a critical part of assessing the impact of these interventions. In the past, OMB had approved the alcohol questions under OMB #2127-0627 and the same safety belt questions under OMB# 2127-0615. The proposed questionnaires are included as Attachments C1 and Attachment C2.

For each mobilization, there will be two waves, a pre- survey and a post survey, which combined will measure the effect of the mobilization. Each survey wave for the safety belt mobilization will consist of 1200 respondents from a representative sample of the general population age 18 and older. Each survey wave for the alcohol mobilization will consist of 1200 respondents from a representative sample of the general population of drivers age 18 or older who have drunk alcohol within the last year. Each year, NHTSA is planning three national mobilizations: one national safety belt mobilization and two national alcohol mobilizations.

National Surveys				
	Survey Waves	Participants	Burden Hours	Respondent Costs
Annual Safety Belt Survey	2	2400	400	\$4,768.00
Annual Alcohol Surveys	4	4,800	800	\$9,536.00
Total	6	7,200	1,200	\$14,304.00
Safety Belt Surveys 3 Year Total	6	7200	1,200	\$14,304.00
Alcohol Surveys 3 Year Total	12	14,400	2,400	\$28,608.00
Grand Total	18	21,600	3,600	\$42,912.00

State Surveys

In regards to administering surveys to specific States, NHTSA is presently working with 22 States in three regions to conduct special safety belt enforcement campaigns, which targets a specific high-risk group: such as young men driving pickup trucks in rural areas. For 2006, NHTSA will survey Florida, Texas, Arizona, Kentucky and Indiana. In 2007, NHTSA will survey Florida, Missouri, Mississippi, Wyoming and Louisiana. In 2008, NHTSA will survey Texas, Florida, Maryland, South Carolina and Kansas. In addition, NHTSA is also working with 15 States to provide strategic evaluation for their impaired driving mobilization. Each year, NHTSA proposes to conduct surveys on a select sub group of these States. For 2006, NHTSA will survey New Mexico, California, Alaska, Missouri and South Carolina. In 2007, NHTSA will survey Arizona, Mississippi, Florida, Texas and Georgia. In 2008, NHTSA will survey Pennsylvania, West Virginia, Ohio, Louisiana and Mississippi. The proposed questionnaires are included as Attachment C1 and Attachment C2. The only difference between the State and National questionnaires is that the slogan recognition questions may include some State specific slogans. For example, when NHTSA administers an impaired driving survey in Texas, question 20b.in attachment C2 could include the following slogans used in Texas: “Drink, Drive, Go to Jail” and “Operation Blue Talon”.

For each mobilization, there will be two waves, a pre- survey and a post survey, which combined will measure the effect of the mobilization. Each survey wave for the safety belt mobilization will consist of 500 respondents from a representative sample of the general population age 18 and older. Each survey wave for the alcohol mobilization will consist of 500 respondents from a representative sample of the general population of drivers age 18 or older who have drunk alcohol within the last year.

State Surveys	Survey Waves	Participants	Burden Hours	Respondent Costs
Annual Safety Belt Survey	10	5000	833.335	\$9,933.36
Annual Alcohol Surveys	10	5000	833.335	\$9,933.36
Total	20	10000	1666.67	\$19866.71
3 Year Safety Belt Survey	30	15000	2500	\$29,800.06
3 Years Alcohol Survey	30	15000	2500	\$29,800.06
Grand Total	60	30000	5000	\$59600.12

Regional Demos

Over the next three years, NHTSA is planning to evaluate five innovative high visibility enforcement programs. These demonstration projects range in scale from community based projects to statewide projects.

1) Nighttime Belt Enforcement Demo

This project will evaluate the effectiveness of nighttime belt enforcement interventions at three community sites. Two sites will be in Tennessee, a primary belt enforcement State, and one site will be Pennsylvania, a secondary belt enforcement State. One of the sites will include collection of alcohol information to see if there is any crossover impact on the alcohol program. There will also be comparison community sites, where no

intervention is occurring, in Tennessee and Pennsylvania. Therefore, pre/post surveys will be conducted at five community sites. Sites will be in communities ranging from 50,000 to 300,000-population size, and be in independent media markets. Sample size per site per survey wave will be 400 from a representative sample of the general population age 18 and older. The surveys will collect information on belt use, perceived enforcement of safety belt laws, and message recognition. The proposed questionnaires are included as Attachments C3, C5, & C6.

2) Combined Alcohol and Belt Nighttime Enforcement

This project will evaluate the effectiveness of combined nighttime alcohol and belt enforcement interventions. All sites will be in Illinois and Arizona, States that permit alcohol checkpoints. There will be three intervention sites and one comparison site. Therefore, pre/post surveys will be conducted at four community sites. Sites will be in independent media markets. Sample size per site per survey wave will be 400 from a representative sample of the general population age 18 and older. The surveys will collect information on belt use, alcohol use, reported drinking and driving behavior, perceived enforcement of safety belt and drinking and driving laws, and message recognition. The proposed questionnaire is included as Attachment C4.

3) Ohio DWI Media Project

This project will evaluate the influence of media on existing DWI enforcement activity in Ohio. Four community sites will be selected, each in independent media markets. Initially, two communities will be experimental sites and two will be comparison sites. At some later point during the field period, the media intervention will be introduced into the comparison communities. Sample size per site per survey will be 400 from a representative sample of the general population age 18 and older. The surveys will collect information on alcohol use, reported drinking and driving behavior, perceived enforcement of drinking and driving laws, and message recognition. The proposed questionnaire is included as Attachment C2.

4) Click It or Ticket: The Next Generation

This project will evaluate up to four yearly high visibility enforcement campaigns within Virginia, Pennsylvania and Iowa. This evaluation will help determine how increased waves of Safety Belt enforcement coupled with paid and earned media that reinforces the "Click It or Ticket" brand will affect belt use rates, Therefore, pre/post mobilizations surveys will be conducted in 2 communities within each state (one control site and experimental site) up to 4 times within one year. Sample sizes per site will be 400 from a representative sample of the general population age 18 and older. The surveys will collect information on belt use, perceived enforcement of safety belt laws and message recognition. The proposed questionnaires are included as Attachments C1.

5) Evaluation of Reaching the High Risk Driver Through Nighttime Safety Belt Enforcement

This project will evaluate the effectiveness of nighttime safety belt enforcement and impaired driving enforcement program in Seattle, Washington. The program, which is scheduled to last 24 months, will include nighttime safety belt checkpoints and a media

message. Pre and post mobilization surveys will be administered in Seattle and a comparison community with a separate media market in Washington State. Sample sizes per site will be 500 from a representative sample of the general population age 18 and older. The surveys will collect information on belt use, alcohol use, reported drinking and driving behavior, perceived enforcement of safety belt and drinking and driving laws, and message recognition. The proposed questionnaire is included as Attachment C4.

Demonstration Projects:				
	Survey Waves	Participants	Burden Hours	Respondent Costs
Nighttime Belt Enforcement Demo Combined	10	4,000	666.67	\$7,946.67
Alcohol and Belt Nighttime Enforcement	8	3,200	533.33	\$6,357.33
Ohio DWI Media Project	12	4,800	800	\$9,536
Click It or Ticket: The Next Generation	16	6,400	1,066.67	\$12,714.67
Evaluation of Reaching the High Risk Driver Through Nighttime Safety Belt Enforcement	4	2000	333.33	\$3973.29
Grand Total	50	20,400	3,400.00	\$40,527.96

A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.

There are no record keeping or reporting costs to respondents. Respondents will be contacted randomly, and asked for their attitudes, knowledge, and behavior related to a specific safety belt or impaired driving intervention. All responses are provided spontaneously. Each respondent only participates once in the data collection. Thus there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and start up costs, or (b) operation, maintenance, and purchase costs as a result of participating in the survey.

A.14. Provide estimates of the annualized cost to the Federal Government.

Based on the 2002-2004 Buckle-Up America Surveys, which cost \$22 per survey, the government estimates the cost of these proposed studies, with adjustment for inflation, to be \$24 per survey. An average of 24,000 persons will be interviewed during each of the survey years. Therefore, the estimated average annual cost to the government would be:

24,000 interviews X \$24 = \$576,000/Year

This cost includes the following components:

- National: 7,200 Interviews X \$24 = \$172,800.00
- State: 10,000 Interviews X \$24 = \$240,000.00
- Demo 6,800 Interviews X \$24 = \$163,200.00

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

The reason for the program change is a result of this new information collection conducting surveys for impaired driving and safety belt interventions.

A.16. For collection of information whose results will be published, outline plans for tabulation and publication.

Weighted frequencies will be computed for each of the questions in the surveys. Statistical tests, such as chi square, will be computed to compare pre-intervention and post-intervention measures to ascertain any statistically significant differences. Findings will be included in technical reports printed by NHTSA and distributed to traffic safety officials at the national, State and local levels, as well as other interested persons. In addition, findings will be disseminated through briefings and presentations to traffic safety officials and other interested parties.

A.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.

NHTSA will display the expiration date for OMB approval.

A.18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of the OMB Form 83-I.

No exceptions to the certification are made.

