

Supporting Statement
for
Information Collection Request

EPA's In-Use Vehicle and Engine Testing Programs

EPA ICR 0222.08

OMB Control No: 2060-0086

Compliance and Innovative Strategies Division
Office of Transportation and Air Quality
Office of Air and Radiation
U.S. Environmental Protection Agency

Part A SUBMISSION

Section 1: Identification of the Information Collection

1(a) Title and Number of the Information Collection

EPA's In-Use Vehicle and Engine Testing Programs, EPA ICR Number 0222.08, OMB Control Number 2060-0086. This collection was previously titled "Investigation into Possible Noncompliance of Motor Vehicles."

1(b) Short Characterization/Abstract

The Environmental Protection Agency (EPA), Office of Transportation and Air Quality, Compliance and Innovative Strategies Division, conducts an integrated motor vehicle and engine emission compliance program. Motor vehicles and engines are first evaluated as prototypes prior to production; those designs that meet applicable criteria are licensed for introduction into commerce. EPA also has discretion to conduct assembly line testing of new vehicles and engines as well as to test emissions of in-use vehicles and engines. This Information Collection Request covers inquiries directed at the owners/lessees of in-use motor vehicles and engines to see if their specific vehicles are suitable for an EPA in-use testing investigation and the paperwork burdens attendant upon election to participate. The program has a light-duty vehicle component and a heavy-duty and nonroad component.

The light-duty component can be broken down into three closely-related headings. The first is the surveillance testing program that has been discussed in detail in prior information collection requests, with the possibility of an add-on compliance testing phase. Only one compliance phase has been conducted in the last five years, but it remains an information collection in this request. The second is a small ongoing program testing the functioning of onboard diagnostics (OBD) systems on in-use vehicles, which is simply additional testing on a subset of vehicles already recruited for the surveillance program. Finally, budget permitting, there are other occasional one-time "special investigations" spot-check tests of vehicles to address specific issues. An example of a special investigation might be procurement of a class of vehicles to test compatibility with a particular portable emissions monitoring (PEM) unit. Special investigations are similar to testing of that portion of surveillance classes that have been selected to address a specific informational need. Because they use the same procurement system as the surveillance and OBD programs, these special investigations should be accounted for in this collection request, although the number of such tests will vary.

Light-duty testing typically includes standard emissions test cycles and standard OBD tests performed at EPA's facility in Ann Arbor. The primary purpose of these programs is informational: to give EPA and manufacturer engineers intelligence regarding emissions performance for in-use vehicles. Manufacturers are involved at every step of the ongoing light-duty programs: they are informed of the surveillance tests, can be present during vehicle preparation and testing, are given test results, and participate in post-failure investigations. The testing supplements information from the manufacturers' own in-use testing programs as well as the mandatory reporting under the manufacturers' In-Use Vehicle Program (IUV) under 40

CFR 1845–1847.

The light-duty programs entail two formalized information collections. Participation in the information collections, as well as the vehicle evaluation, is strictly voluntary. (The actual solicitation of information is conducted by EPA’s contractor, EG&G, at its Michigan Procurement Facility (MPF)). First, 25 to 50 owners/lessees are randomly selected from the owner list of vehicles obtained from the Michigan Secretary of State within about 60 miles of Ann Arbor and sent a letter with a card and return envelope to accept or decline the invitation to participate (Attachments II, III, and IV). After a suitable time for response, all positive respondents are considered for inclusion, and called in order from the list. If the owner/lessee is reached and willing, a telephone questionnaire is conducted that asks about a half dozen questions concerning vehicle condition and maintenance (see Attachment V). The first three who complete the telephone questionnaire provide the vehicles for the surveillance class. If there are any test failures in the first three, then two more are recruited in the same manner. Additional groups of potential participants will be contacted if necessary until the required three or five vehicles have been obtained.

Information collected is used to insure that vehicles procured meet relevant criteria. For example, the vehicle should not have been tampered with or have other overt problems. Other testing investigations and vehicle types may have different criteria.

Those who elect to participate are asked if they are willing to bring in their maintenance records for copying when they deliver their vehicles. Doing so is voluntary and has no effect on eligibility. At the time of delivery, participants go over the telephone questionnaire answers and sign a notarized statement that the answers are correct. They sign either EG&G’s cash incentive or a loaner car agreement, and an EG&G test agreement. Upon picking up their vehicle, they sign a vehicle release.

As part of the surveillance process, EPA attempts to determine the cause of any test failures. Post-test “special maintenance” involves close examination of the vehicle, nearly always with manufacturer participation. This will most often produce relevant information about the cause of the failure. Surveillance test data are also supplemented with information from manufacturer application test data, EPA confirmatory test results, defect reports, service bulletins, CARB (California Air Resources Board) warranty reports, state Inspection/Maintenance (I/M) information, manufacturer service technician bulletins, and the results of the manufacturers’ IUVP. Manufacturers/importers are involved in the process from the outset, and receive all test results, including test failures. The process of identifying problems is collaborative and cooperative in nearly all cases. If EPA believes that a recall is indicated, and the manufacturer/importer agrees that EPA’s conclusion is valid, it will agree to conduct a voluntary recall. However, if questions remain, EPA has procedures in place to run a compliance test phase with continued manufacturer involvement. Even at this stage the inferences are informational rather than statistical, to identify based on engineering judgment the appropriate population to which the problem applies, identify the cause of the problem, resolve issues regarding the testing protocols and results, etc. The process has not been adversarial in recent years. There has only been one compliance class in the last five years, and that was

amicably resolved without any recall (manufacturer and EPA in-use test results compared and found acceptable).

Based on information gathered from all sources, EPA can make an administrative finding mandating recall and repair of in-use vehicles if it determines that “a substantial number” of vehicles in a class or category do not comply with the emissions requirements as a result of its own in-use testing program. In reality, such a determination will be based on information from a variety of sources that may or may not include EPA in-use testing. Such findings are subject to the Administrative Procedures Act and are reviewable in court under the “substantial evidence” test (5 USC 706(2)(E)), which is restated in the “substantial evidence” standard in the Clean Air Act for ordering recalls.

Procurement of light duty vehicles for a compliance testing phase is similar, except that EPA may make several attempts to contact an owner/lessee by telephone or mail; participants in the surveillance phase are screened out.

The heavy-duty and nonroad in-use testing component is quite similar to the light-duty component. It likewise supplements the authority for confirmatory testing during the certification process and for production line audits as part of a comprehensive compliance strategy. In this case, the in-use testing authority has particular salience within the overall compliance strategy because little if any production-line or confirmatory testing currently occurs. The program also differs considerably in its procurement and testing procedures.

Heavy duty trucks, those commonly referred to as over 3/4 ton capacity, are usually parts of fleets leased to businesses, held by the leasing companies themselves, or government owned. Potential fleet owners/lessees can be found in registrations lists; engine manufacturers will also supply identities of their customers. In addition, EPA’s heavy-duty and nonroad staff in Washington, D.C., have a network of such entities who have shown a willingness to participate over the years. Once a potential source is identified, EPA will make a brief telephone call to the fleet manager to ascertain if they wish to participate. If the response is positive, EPA’s contractors at the U.S. Army Aberdeen Test Center in Maryland will frequently visit the fleet to install the testing instruments at the company’s service facility or government garage. (EPA also has the capability of conducting some in-use testing in Denver, Colorado.) Otherwise, the lessee will be within driving distance of the testing grounds and the devices will be installed there. A single fleet can supply multiple vehicles. All participation is voluntary. The procedure for procuring nonroad vehicles and engines (e.g., farm tractors, compressors) is similar; in some cases the vehicle or engine may be rented for the day. Therefore, EPA’s heavy duty and nonroad in-use testing program makes far fewer inquiries than with individual owners of light vehicles.

The heavy-duty and nonroad vehicle and engine in-use testing is done via the installation of “Rover” model portable emissions monitoring devices. If the devices are installed at the fleet location, typically the fleet’s drivers will operate the installed trucks; if the tests are conducted at Aberdeen, there are standard test routes. A typical data session will last an hour to an hour and a half. The driving conditions and information gathered may vary depending on the issues relevant to the in-use class selected.

In the last fiscal year an estimated 311 vehicles and engines were in-use tested by EPA. Adding an allowance for about 25 special investigation vehicles (the number is expected to vary from year to year) and the possibility of a compliance class, the estimate here is 336 procured vehicles and engines, corresponding to 4,375 contacts and 254 telephone interview and/or other followup participant contacts. Assuming that 4,375 respondents spend an average of 8.48 minutes, this collection imposes a burden of 619 hours annually. This collection has no recordkeeping requirements.

Section 2: Need for and Use of the Collection

2(a) Need/Authority for the Collection

Under Title II of the Clean Air Act, (42 U.S.C. 7521 et seq.), manufacturers of motor vehicles and engines are required to design and build vehicles which will comply with emission standards throughout their useful lives. (“Useful life” is defined by statute and regulation; it varies by type of vehicle or engine.) Pursuant to section Clean Air Act section 207(c) (42 USC 7541, see Attachment I), EPA is responsible for monitoring compliance and investigating possible noncompliance with emission standards.

In order to fulfill this function, it is necessary for EPA to test actual “in-use” vehicles; these vehicles must be obtained from their owners/lessees. As part of the procurement process, EPA must determine that the vehicle is within the useful life and that it has been “properly maintained and used”. In order to do this, EPA must make a limited inquiry of the owner/lessees who are willing to participate; see Attachment V for an example telephone questionnaire.

2(b) Practical Utility/Users of the Data

EPA needs the information from the vehicle owner/lessee to determine that the vehicle is within its “useful life” and that it has been “properly maintained and used.” EPA’s Compliance and Innovative Strategies Division, Office of Transportation and Air Quality, is the sole user of this information. Manufacturers are informed of pre-test maintenance and test dates and receive all test results from the light-duty programs. They also participate in post-test “special maintenance” to investigate failures.

Section 3: Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

The information obtained from the vehicle owner/lessee is unique to that specific vehicle or engine; it is not obtainable from any other source. There is no information available, in either public or private databases, that will adequately serve the program purposes. (Some vehicle maintenance information, such as warranty repairs and scheduled maintenance done at dealers’

outlets, is available from manufacturers and commercial automotive data services, and such information may be supplied by manufacturers in their own interests or as queried by EPA. However, it is not a substitute for owners'/lessees' own records.) Additionally, there are no other similar government programs which would allow sharing of data.

3(b) Public Notice Prior to ICR Submission to OMB

EPA solicited public comment by means of a Federal Register Notice published on April, 2007, 72 Federal Register 19925. No comments were received.

3(c) Consultations

In preparing this ICR, EPA consulted with Ms. Kim Cieslak, EG&G Michigan Procurement Facility, (734) 214-4568. (EG&G is EPA's contractor that procures and maintains in-use passenger cars and light duty trucks.) Ms. Cieslak mails out the procurement letters and conducts the telephone interviews; she was asked to monitor how much time the interviews required. She determined the average to be 20 minutes.

3(d) Effects of Less Frequent Collection

Information is collected only once per vehicle or engine evaluation; less frequent collection is not possible.

3 (e) General Guidelines

This information collection activity complies with the requirements of 5 CFR 1320.5(d) (2).

3 (f) Confidentiality

Information gathered from light-duty respondents is stored in contractor files. These paper records, including names and social security numbers needed for those who accept payment in lieu of loaner cars in the light-duty program, are completely segregated from test results, which are separately handled and stored by EPA. Respondent information is handled and stored exclusively by the contractors EG&G. It is not available to the public. Non-personal information (such as maintenance record data) may occasionally be queried by EPA staff, who convey the request to EG&G, who in turn retrieve the information from respondent files and answer the EPA query. Test results are tracked by VIN number and are shared with manufacturers by email automatically; they are available to the public. This information collection complies with the Privacy Act of 1974 and OMB Circular A-130.

3(g) Sensitive Questions

No sensitive questions are asked in this information collection.

Section 4. Respondents and Information Requested

4(a) Respondents/SIC & NAICS Codes

The respondents are individual vehicle owners/lessees of any regulated vehicle or engine regulated by EPA under the Clean Air Act (No NAICS code) as well as members of the trucking industry (NAICS 484110, 484121 & 484122.)

4(b) Information Requested

(i) Data items

Respondents who receive EPA's initial request (see Attachments II and III and IV) are asked to supply the following information on a card via a postage paid return envelope; participation is entirely voluntary:

- Do they own/lease the desired vehicle; verify the make and model
- Current odometer reading
- Are they the original owner/lessee
- Transmission type
- Are they interested in participating; how EPA should contact them.

Those who indicate they wish to be considered for participation are asked for additional information:

- Has the odometer malfunctioned and, if so, for how long was it inoperative
- Has the vehicle catalyst ever been replaced
- Do they have maintenance records; would they allow EPA to review and copy them

There are no recordkeeping requirements associated with this collection.

(ii) Respondent Activities

Responses to the request for participation and information collection are strictly voluntary.

Those wishing to participate are asked to fill out a postage-paid information card. They are then contacted by telephone to obtain the additional information listed above. Vehicles that will be evaluated are brought to EPA's facility for testing. For the light-duty programs, the owners/lessees receive either a cash incentive for each day EPA keeps the vehicle or a late model loaner car with a full tank of gas and unlimited mileage for the duration of the testing, which may take two to three weeks.

Most of the information requested is known by the owner/lessee; some information might

have to be obtained by simple vehicle or engine inspection or by reference to maintenance records (if available).

Section 5: The Information Collected--Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

Agency staff typically have no involvement in gathering the information, as that task is done by an EPA contractor. However, on occasion, staff are required to answer specific questions that arise during the information gathering process. Agency staff do review the final telephone questionnaire for completeness as well as potential issues relevant to the vehicle being evaluated. Agency staff select the vehicle class to be tested, view test results, and participate in discussions with manufacturers relating to the testing preparations and results.

5(b) Collection Methodology and Management

Information is obtained via mailed responses and telephone interviews; it is stored on paper in a vehicle file. The information is reviewed to see if the specific vehicle or engine meets the criteria for evaluation. The file is typically maintained for five years and then destroyed

Due to the limited amount of information collected and its very limited use, electronic storage and processing are not employed.

5(c) Small Entity Flexibility

The information requested is completely voluntary and imposes no mandatory burden on any respondent. The information collected is the minimum necessary to assure that vehicles meet the criteria for evaluation. Therefore, there can be no process which reduces the burden on small entities.

5(d) Collection Schedule

Information is collected on a continuous basis. The number of solicitations mailed out in a given time frame is a function of available test capacity and how difficult a particular vehicle type is to procure.

Section 6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

As explained above, EPA's contractor estimated that each telephone interview takes approximately 20 minutes on average. Subsequent information-related burdens for participants

(such as reviewing and attesting to the telephone questionnaire answers and supplying maintenance records voluntarily) upon delivery of light-duty vehicles, is estimated at 40 minutes. We estimate that the initial contact burden (by postcard and letter) to averages 5 minutes. We estimate paperwork burdens for heavy-duty and nonroad testing to be 60 minutes per contact.

6(b) Estimating Respondent Costs

(i) Estimating labor costs.

There is no typical individual owner/lessee; they represent the average person who acquires or owns a vehicle or engine. The average respondent from a firm using commercial vehicles would be classified as “manager” with a total cost of \$75.00/hour. (Estimated from the US Department of Labor, Bureau of Labor Statistics 2001 National Occupational Employment and Wage Estimates, 11-1021 General and Operations Manager at \$35.37 with 110% assumed for benefits and overhead.) Since EPA has no information on the population of individual owners/lessees (that information is not collected) the “manager” class will be used here as well. The labor total is thus \$49,320 a year.

(ii) Estimating Capital and Operations and Maintenance Costs

This collection has no capital, operations or maintenance costs.

(iii) Start-up Costs

This collection has no start-up costs.

6(c) Estimating Agency Burden

EPA uses contractor employees to collect essentially all the information covered by this information collection request. The most recent annual contractor costs for the light duty testing component was approximately \$697,000 plus \$70,000 for the OBD portion. For the heavy-duty and nonroad component, the most recent contract cost was \$661,000. An estimated 1.5 EPA employees oversee the programs at an annual cost of \$150,000. The total estimated Agency cost is \$1,578,000 per year.

6(d) Estimating the Respondent Universe and Total Burden and Costs

From the above discussion the following total burden and cost estimates can be calculated as presented below.

6(e) Bottom Line Burden Hours and Cost

(i) Respondent Tally

Program	Vehicles/ Engines	Initial Contacts	Burden @ 5 min ea. (min)	Participant Contacts	Burden @ 60 min ea (min)
LD Surveillance	150	3673	18365	150	9000
LD Confirmatory	0	0	0	0	0
OBD Surveillance	35	0	0	0	0
Special	25	612	3061	14	840
Heavy Duty	54	54	270	54	3240
Non-road	72	36	180	36	2160
Total	336	4375	21876	254	15240
Total burden (hrs)					619

There are no respondent operating, capital, or startup costs associated with this collection.

(ii) Agency tally

EMPLOYEES 1.5 (directly involved in information collection)
 COST \$ 150,000

6(f) Reasons for change in burden

The changes in burden are due to an updated and more particularized and accurate estimate of EPA's ongoing and anticipated in-use testing numbers and the numbers of solicitations mailed. Burdens have been re-estimated for, and allocated among, initial solicitations for participation and subsequent information burdens attendant upon participation for the light-duty program.

6(g) Burden Statement

The annual public reporting and recordkeeping burden for this collection of information is estimated to average .15 hours per response. This estimate includes the time to review the solicitation material, complete the reply correspondence, complete the telephone questionnaire, and complete paperwork for delivery and pickup of participating vehicles and engines. Participation is completely voluntary.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the

collection or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulation are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2007-0286, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2007-0286 and OMB control number 2060-0086 in any correspondence.

Attachment I

Legal Authority

42 USC 7541. - Compliance by vehicles and engines in actual use

* * * * *

(c) Nonconforming vehicles; plan for remedying nonconformity; instructions for maintenance and use; label or tag

Effective with respect to vehicles and engines manufactured during model years beginning more than 60 days after December 31, 1970 -

(1) If the Administrator determines that a substantial number of any class or category of vehicles or engines, although properly maintained and used, do not conform to the regulations prescribed under section 7521 of this title, when in actual use throughout their useful life (as determined under section 7521(d) of this title), he shall immediately notify the manufacturer thereof of such nonconformity, and he shall require the manufacturer to submit a plan for remedying the nonconformity of the vehicles or engines with respect to which such notification is given. The plan shall provide that the nonconformity of any such vehicles or engines which are properly used and maintained will be remedied at the expense of the manufacturer. If the manufacturer disagrees with such determination of nonconformity and so advises the Administrator, the Administrator shall afford the manufacturer and other interested persons an opportunity to present their views and evidence in support thereof at a public hearing. Unless, as a result of such hearing the Administrator withdraws such determination of nonconformity, he shall, within 60 days after the completion of such hearing, order the manufacturer to provide prompt notification of such nonconformity in accordance with paragraph (2).

* * * * *

Attachment II

Sample Solicitation Letter (EPA)

Dear Vehicle Owner:

The Environmental Protection Agency and EG&G Inc. (under contract to EPA) are conducting an important program to help control air pollution, which involves analyzing vehicle exhaust emissions. You may be able to contribute significantly toward this program and be rewarded for your cooperation. If your vehicle qualifies, we will offer you a number of incentives to participate:

- . The use of a late-model, fully insured loaner car with a full tank of fuel, and \$20.00 per day.
2. If you do not wish to use the loaner vehicle, you will receive \$50.00 per day.
3. Your vehicle will be returned with a full tank of fuel.

The testing will be conducted in EPA's National Vehicle and Fuel Emissions Laboratory (formerly known as the Motor Vehicle Emissions Laboratory) in Ann Arbor. Your vehicle will probably accumulate less than 300 miles under simulated driving conditions. No unusual operations will be performed on your vehicle and it will be fully insured for the entire test period, which will take approximately two to three weeks.

Please complete and return the enclosed reply card in the prepaid envelope to EG&G Inc. as soon as possible, even if you choose not to participate. If you are willing to participate, a representative of EG&G will be in touch with you to ask questions about your vehicle.

The enclosed information sheet answers some questions people often ask about this program. If you have any additional questions, please feel free to call EG&G Inc. at **(734) 665-1227** or me, Sue Cook, at **(734) 214-4200**. We will be happy to answer any questions you may have. We look forward to receiving your reply card or a telephone call very soon.

Sincerely,

Sue Cook

Attachment III

Sample Solicitation Letter (EPA' Contractor)

Dear Vehicle Owner:

EG&G Inc. is under contract with the United States Environmental Protection Agency to obtain privately owned vehicles for the test program explained in the enclosed message and to perform routine maintenance and inspection procedures on the selected candidate vehicles.

Additionally, it is our responsibility to provide you with the incentives which have been authorized by the Environmental Protection Agency.

We hope you will join us in this important project. Please complete and return the enclosed card in the prepaid envelope.

If you have any questions, an unlisted telephone number, or if it may be difficult to reach you by telephone, we would appreciate your calling us at **(734) 665-1227**.

Sincerely,

John H. White
Program Manager

Attachment IV

Example Return Card

1. Owner's Name _____ 2. Control No. _____

THIS INFORMATION REQUEST IS AUTHORIZED BY LAW. WHILE YOU ARE NOT REQUIRED TO RESPOND, YOUR COOPERATION IS NEEDED TO MAKE THE RESULTS OF THIS INVESTIGATION VALID.

3. Do you own/lease a _____ vehicle with the vehicle identification number (VIN) _____ ? yes no
4. If so, list the Make _____, Model _____
5. Current odometer reading _____ miles.
6. Are you the original owner/lessee? yes no
7. Is your vehicle automatic manual
8. Are you interested in participating in this program?
 yes no need more information.
9. May we contact you at your convenience:
- Home Phone: (_____) - _____ Best time to call: _____ a.m. _____ p.m.
- Work Phone: (_____) - _____ Best time to call: _____ a.m. _____ p.m.

IF YOU HAVE ANY QUESTIONS, PLEASE CALL US TOLL FREE AT (866)865-1228.

WHETHER OR NOT YOU PLAN TO PARTICIPATE, PLEASE RETURN THIS CARD IN THE POSTAGE PAID ENVELOPE.

OMB No. 2060-0086
Form Approved OMB No. 158-R0146

Attachment V

Example Telephone Questionnaire

TELEPHONE QUESTIONNAIRE

OMB No. 2060-0086

For Surveillance CLASS G138/139

(Expires (09/30/07))

2000 MITSUBISHI LDV

VEHICLE CONTROL NUMBER _____ DATE _____

ADMINISTERED BY _____

OWNER'S NAME _____

STREET ADDRESS _____

CITY _____

STATE _____ ZIP _____

(CALL NUMBER BELOW THAT IS MARKED WITH AN "X")

TELEPHONE (Home) /_____/_____ (Business) /_____/_____

BEST TIME TO CALL _____

"WE ARE AUTHORIZED BY FEDERAL LAW TO COLLECT THIS INFORMATION. WHILE YOU ARE NOT REQUIRED TO RESPOND, YOUR COOPERATION IS NEEDED TO MAKE THE RESULTS OF THIS INVESTIGATION VALID."

DATE OF CONTACT _____ TIME OF CONTACT _____

INDIVIDUAL CONTACTED _____

TO BE COMPLETED _____ DATE AND TIME OF COMPLETION _____

You have been selected from a list of vehicle owners living in the Detroit/Ann Arbor metropolitan area to participate in a study of vehicle emissions being conducted by the U.S. Environmental Protection Agency.

EPA is authorized by law to conduct this study and to offer incentives to you for your cooperation should you decide to participate. Your participation in this program is strictly voluntary.

The accuracy of the information that you provide is important. The information that you provide will be used by EPA along with emission results for your vehicle to determine whether the automobile manufacturer has complied with clean air standards established by Congress. The test results from your vehicle will not be used by EPA to take action against you. Your cooperation will help EPA's efforts to control air pollution due to motor vehicle emissions.

The public reporting and recordkeeping burden for this collection of information is estimated to average 20 minutes per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2007-0286, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2007-0286 and OMB control number 2060-0086 in any correspondence.

These are the conditions of the program:

- we ask that you bring your vehicle into our testing facility where you will receive either a cash incentive for each day we keep your vehicle or a late model loaner car which will have a full tank of gas and unlimited mileage. This vehicle is yours to use without charge for the duration of the testing, which may take approximately 2 to 3 weeks. During this time, we will be performing a series of tests on your vehicle to measure vehicle emissions.

At the time the vehicle is delivered to us for testing, you will be required to sign an affidavit stating that the answers to the questions you will be asked are true and accurate to the best of your knowledge.

We will provide you the following incentives for participating in our program:

- If your vehicle is accepted into the program, a full tank of gas and a cash incentive will be awarded. You will receive \$20 per day for each day your vehicle is at NVFEL, and the use of a fully-insured loan car; or \$50 per day for every day your vehicle is at NVFEL in lieu of a loan car.

However, if your vehicle is rejected after you bring it to the lab, but before you leave, you will receive a \$20 payment.

The compensation will be based upon whole days, beginning with the day your vehicle arrives. It will end one day after you are notified your vehicle is ready for return.

The maintenance performed on your vehicle will depend on program requirements.

You will be given a list of any parts that are replaced.

Are you willing to participate? YES / / NO / /

If you are not, may we ask why not? _____

IF RESPONSE IS POSITIVE:

For the purpose of this study, I am going to ask you some questions about your vehicle's maintenance and usage history. You should answer these questions to the best of your knowledge and indicate when you are not sure of something.

FOR AMPF PERSONNEL@ ONLY

SENTENCES IN CAPITAL LETTERS ARE INSTRUCTIONS TO THE CLERK AND ARE NOT INTENDED TO BE READ TO THE OWNER.

1. a. What are the model year, transmission type, vehicle identification number and engine family of your vehicle? The engine family can be found on a Vehicle Emission Control Information decal located underside of the hood.

The engine family should start with the letters Y D S

/ / Owner is unable to locate.

/ / Owner located. ENGINE FAMILY _____

/ / Engine family located when vehicle arrived at the Lab.

ENGINE FAMILY _____

Engine Family must be = YDSXV02.4GNG or GFG

b. MODEL _____ VEHICLE ID

NO. _____

MODEL YEAR _____

TRANSMISSION: AUTOMATIC / / AIR CONDITIONED: YES / /
NO / /

MANUAL / / ODOMETER MILEAGE: _____

FOR CLASS G138 PROCURE TWO VEHICLES WITH ODOMETER MILEAGE BETWEEN 0 AND 50,000 MILES. FOR CLASS G139, PLEASE PROCURE ONE VEHICLE WITH ODOMETER MILEAGE BETWEEN 50,001 AND 75,000 MILES, IF POSSIBLE.

- c. Has the odometer ever not functioned properly?

YES / / NO / /

If yes, approximately how long (months/miles) was it inoperable?

CONSULT EPA FOR ELIGIBILITY IF THE RESPONSE IS "YES"

- d. Has the oxygen-sensor ever been replaced ?

YES / / NO / /

CONSULT WITH EPA IF THE RESPONSE IS YES.

2. Has your vehicle's catalyst ever been replaced?

YES / / NO / /

If yes, eliminate.

3. Have you kept records of the maintenance and repairs performed on your vehicle?

YES / / NO / /

4. Would you allow them to be reviewed and duplicated?

YES / / NO / /

IF RECORDS ARE AVAILABLE, INFORM OWNER THAT: It is important that they are brought to the lab for review. DUPLICATE THE RECORDS.

INFORM THE OWNER THAT: All valuables should be removed from the vehicle (including those in the glove box) prior to bringing the vehicle to the lab.

ALSO INFORM THE OWNER THAT: Due to the location of some systems, the glove box and trunk may need to be opened during maintenance by MPF and EPA personnel. Any records pertaining to the vehicle's maintenance history found in the vehicle may need to be copied.