

CONFIDENTIAL CLOSE CALL REPORTING SYSTEM SUPPORTING JUSTIFICATION – Part 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.

The Federal Railroad Administration (FRA) has statutory responsibility to ensure the safety of railroad operations. See the Federal Rail Safety Act of 1970 (45 U.S.C. §§ 421 et seq.; now 49 U.S.C. 20103). Under this authority, the authority of the Accident Reports Act (originally codified at 45 U.S.C. 42 and then re-codified at 49 U.S.C. 20901) and its accident/incident reporting regulations (found at 49 CFR Part 225), FRA collects data on railroad accidents/incidents and worker casualties, and monitors industry trends.

In the U.S. railroad industry, injury rates have been declining over the last 25 years. Indeed, the industry incident rate fell from a high of 12.1 incidents per 100 workers per year in 1978 to 3.66 in 1996. As the number of incidents has decreased, the mix of causes has also changed toward a higher proportion of incidents that can be attributed to human and organizational factors. This combination of trends – decrease in overall rates but increasing proportion of human factors-related incidents – has left safety managers with a need to shift tactics in reducing injuries to even lower rates than they are now.

In recognition of the need for new approaches to improving safety, FRA has instituted the Confidential Close Call Reporting System (C³RS). The operating assumption behind C³RS is that by assuring confidentiality, employees will report events which, if dealt with, will decrease the likelihood of accidents. C³RS, therefore, has both a confidential reporting component and a problem analysis/solution component. C³RS is expected to affect safety in two ways: First, it will lead to problem solving concerning specific safety conditions. Second, it will engender an organizational culture and climate that supports greater awareness of safety and a greater cooperative willingness to improve safety.

If C³RS works as intended, it could have an important impact on improving safety and safety culture in the railroad industry. While C³RS has been developed and implemented with the participation of FRA, railroad labor, and railroad management, there are legitimate questions about whether it is being implemented in the most efficacious way and whether it will have its intended impact. Further, even if C³RS is successful, it will be necessary to know if it is successful enough to implement on a wide scale. To address these critical questions, FRA is implementing a formative evaluation to guide program development, a summative evaluation to assess impact, and a sustainability evaluation to determine how C³RS can continue after the test period is over. The evaluation is needed

to provide FRA with guidance as to how it can improve the program, and how it might be scaled up throughout the railroad industry.

Program evaluation is an inherently data driven activity. Its basic tenet is that, as change is implemented, data can be collected to track the course and consequences of the change. Because of the setting in which C³RS is being implemented, that data must come from the railroad employees (labor and management) who may be affected. Critical data include beliefs about safety and issues related to safety, and opinions/observations about the operation of C³RS.

This proposed collection of information addresses the conduct of interviews that constitute one part of an evaluation that will combine interview data, surveys of organizational safety culture, and analysis of corporate data on productivity. (The survey activity is being administered by the Bureau of Transportation Statistics, and has already received OMB approval). The interviews are needed to provide insight as to how the quantitative data should be interpreted, and insight as to how the workers perceive the program.

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 proposed study is a new collection of information, and is a five-year demonstration project to improve rail safety. It is designed to identify safety issues and propose corrective action based on voluntary reports of close calls submitted to the Bureau of Transportation Statistics (BTS).

The data will be used by FRA's contractors to evaluate the process by which the C³RS was implemented, its impact on the rail industry, and factors related to the sustainability of the program. Specifically, data will be collected by the evaluation's prime contractor (NewVectors Division of TechTeam Government Solutions) and by staff at the Volpe National Transportation Systems Center (Volpe) to determine whether the program is succeeding, how it can be improved and, if successful, what is needed to spread the program throughout the entire railroad industry.

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 FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.

FRA strongly endorses and highly encourages the use of advanced information

technology, where feasible, to reduce burden. In this proposed collection of information, however, computers are not the most appropriate tool for the needed data collection. Opinions about safety, C³RS, and related topics can be most comprehensively and clearly collected by means of phone interviews by trained staff. The questions are inherently long as people are being asked for opinions that cannot be reduced to fixed-choice formats. In order to avoid the burden of asking people to write long answers, interviews, in which the trained interviewers record responses, are necessary. Further, any given respondent may have a unique perspective or opinion that deserves clarification or follow-up elaboration to a specific question(s). This process cannot be predicted well enough in advance to allow the standardization that is conducive to computerized administration by FRA's contractors.

It should be noted that the total burden for the proposed collection of information is already minimal.

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.

The information collection requirements to our knowledge are not duplicated anywhere.

Similar data are not available from any other source at this time.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF OMB FORM 83-1), DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.

Small businesses and entities are not involved. Thus, there is no impact at all on small entities that will result from the proposed collection of information.

6. DESCRIBE THE CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

If the proposed collection of information is not conducted, FRA will lose a unique opportunity to study the Confidential Close Call Reporting System (C³RS) and the issue of railroad worker injuries. FRA's main mission is to promote and enhance rail safety. Over the last several years, FRA has made a major policy commitment to improving safety in the railroad industry through innovative, human factors based programs. The agency has backed up this commitment with major funding for the C³RS program. The operating assumption behind C³RS is that by assuring confidentiality, employees will report events which, if dealt with, will decrease the likelihood of accidents. The evaluation of this program is designed to provide FRA with the guidance it needs

regarding the expansion of this pilot program throughout the rail industry in order to reduce the number and severity of rail accidents/incidents that occur each year and the corresponding injuries and fatalities that rail workers experience. Without this needed guidance, the quality of the agency's C³RS decision will be severely degraded. Further, without this collection of information, FRA will be greatly hampered in meeting Departmental and agency goals to reduce rail worker injuries and fatalities caused by human factor errors.

The frequency of data collection is scheduled to conform to a methodology that will allow FRA's contractors to track change over time. Fewer data collection points than the ones proposed will make it difficult to discern patterns.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

-REQUIRING RESPONDENTS TO REPORT INFORMATION TO THE AGENCY MORE OFTEN THAN QUARTERLY;

-REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;

-REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;

-REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN THREE YEARS;

-IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;

-REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;

-THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUTE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR

-REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN

DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.

All information collection requirements are in compliance with this section.

8. **IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, REQUIRED BY 5 CFR 1320.8(d), SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.**

DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORDKEEPING, DISCLOSURE, OR REPORTING FORMAT (IF ANY), AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS--EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

As required by the Paperwork Reduction Act of 1995, FRA published a notice in the **Federal Register** on July 5, 2007, soliciting comment from the railroad community, the public, and other interested parties regarding the proposed collection of information. See 72 FR 36750. FRA received one comment in response to this notice.

The letter came from Mr. John P. Tolman, Vice President and National Legislative Director of the Brotherhood of Locomotive Engineers and Trainmen (BLET). BLET, a Division of the Rail Conference of the International Brotherhood of Teamsters, is the duly designated and recognized collective bargaining representative for the craft or class of Locomotive Engineer employed on all Class I railroads. BLET also represents operating and other employees on numerous Class II and Class III railroads. In his comments, Mr. Tolman noted the following:

. . . the proposed information collection activity would have a significant impact on our members. For the reasons set forth below, BLET strongly supports and urges OMB to approve the request.

Recognizing the potential safety benefit of C³RS – as evidenced by successes in similar programs in the aviation and health care industries – the BLET was a founding member of the C³RS National Planning Committee, and is a member of the successor C³RS National Steering Committee. We have participated in C³RS activities at all levels in the industry, and have supported implementation of C³RS in several areas. See, e.g., 71 FR 56217-56219.

The breath of voluntary acceptance of the C³RS process throughout the railroad industry will depend upon the extent of demonstrable evidence that the process improves railroad safety. Accordingly, a thorough and independent evaluation of C³RS is an essential element of the process. The evaluation, as proposed, is both necessary for FRA to properly execute its functions, and properly structured so as to achieve its stated purpose. We wholeheartedly urge OMB to approve the request, and look forward to participating in this element of the C³RS process.

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

There are no monetary payments provided or gifts made to respondents associated with this proposed collection of information.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

FRA fully complies with all laws pertaining to confidentiality, including the Privacy Act of 1974. Thus, information obtained or acquired by FRA's contractor, TechTeam Government Solutions, will be used exclusively for analysis of the implementation, impact, and sustainability of the C³RS program. None of the information obtained that might identify individuals will be disseminated or disclosed in any way. This fact will be explained to respondents prior to beginning any interview. No micro-level data will be released to the public. All reported data will be aggregated in a manner that prevents identification of a specific individual. Additionally, the interview protocol will not ask participants for their names, or the name of the company they work for.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

There are no questions or information of a sensitive nature, or data that would normally be considered private matters contained in this proposed collection of information.

12. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

-INDICATE THE NUMBER OF RESPONDENTS, FREQUENCY OF RESPONSE, ANNUAL HOUR BURDEN, AND AN EXPLANATION OF HOW THE BURDEN WAS ESTIMATED. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCES IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOUR FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

-IF THIS REQUEST FOR APPROVAL COVERS MORE THAN ONE FORM, PROVIDE SEPARATE HOUR BURDEN ESTIMATES FOR EACH FORM AND AGGREGATE THE HOUR BURDENS IN ITEMS 13 OF OMB FORM 83-I.

-PROVIDE ESTIMATES OF ANNUALIZED COST TO RESPONDENTS FOR THE HOUR BURDENS FOR COLLECTIONS OF INFORMATION, IDENTIFYING AND USING APPROPRIATE WAGE RATE CATEGORIES. THE COST OF CONTRACTING OUT OR PAYING OUTSIDE PARTIES FOR INFORMATION COLLECTION ACTIVITIES SHOULD NOT BE INCLUDED HERE. INSTEAD, THIS COST SHOULD BE INCLUDED IN ITEM 14.

Form	Number of Respondents	Number of Responses per Respondent	Time per Response	Total Burden in Hours	Cost*
FRA F 6180.126A Key Stakeholder Interviews for the Evaluation of C ³ RS	133.5	1	60 min	133.5	\$7,476
FRA F 6180.126B Railroad Employees Views of C ³ RS	133.5	1	60 min	133.5	\$4,447

*at \$56 and \$33.31 per hour, respectively (includes 40 percent overhead costs added to annual hourly salary). See explanation below.

Data collection plans estimate a maximum of 200 interviews in the first year, 200 interviews in the second year, and 400 interviews in the third and subsequent years. Each interview will last approximately one hour. Thus, FRA is requesting approval to conduct 800 hours of interviews over the first three years, which amounts to an average of 267 hours per year once the proposed collection begins.

Two interview protocols will be used, one for key stakeholders, and one for railroad workers. (Precise question wording will differ slightly depending on the key stakeholder’s position, but the intent of the protocol and the questions will remain the same.) Because the frequency of the key stakeholder interviews will depend on stability of local C³RS implementations, it is difficult to provide a specific number of interviews for each group. (In the early stages of C³RS, or if the program is not working smoothly, interviews will be more frequent.) It is also the case that the number of railroad workers who will be available for interviews will vary with circumstances (e.g., scheduling issues affecting the ability to interview people in groups). However, given what we know from experience about interviewing stakeholders and railroad workers, it is reasonable to assume that about half of the total number of respondents will be railroad workers, and half key stakeholders. This works out to 133.5 hours per respondent group.

Data for railroad workers comes from the 2006 Bureau of Labor Statistics Occupational Employment Survey.

Occupation Title	Mean Hourly
Locomotive Engineers	\$29.74
Locomotive Firers	\$21.96
Rail Yard Engineers, Dinkey Operators, and Hostlers	\$19.24
Railroad Brake, Signal, and Switch Operators	\$25.05
Railroad Conductors and Yardmasters	\$28.31
Rail Transportation Workers, All Other	\$18.43
Average	\$23.79

The total burden for rail workers for three years will be: \$13,341 or \$4,447 per year. This figure is based on the average rate of \$33.31/hour (\$23.79 per hour with a burden rate of 40%), and a burden total of 133.5 hours per year.

Key stakeholders who will be interviewed will include government personnel at FRA and the Volpe National Transportation Systems Center, managers at participating railroads, and union officials at participating railroads, in equal proportions. Using the BLS data for railroad workers, BLS data for managers, government figures for grades GS 13 – 15, and a 40% burden rate yields an hourly rate of \$56/hour. Total cost = \$56/hour x 133.5 hours per year x 3 years = \$22,428 or \$7,476 per year.

13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY

HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

-THE COST ESTIMATES SHOULD BE SPLIT INTO TWO COMPONENTS: (A) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (B) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COSTS FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.

-IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

-GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEP RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.

Except for the costs enumerated in the response to question number 12 above, there will be no additional costs to respondents who will be interviewed for the proposed collection of information.

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, WHICH SHOULD INCLUDE QUANTIFICATION OF**

HOURS, OPERATIONAL EXPENSES SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF, AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

Costs for the evaluation contractor are based on BLS rates for statisticians and analysts. Costs for government personnel are based on published data for GS 13 – GS 15.

Task	Cost for all years
Key stakeholder interviews (development, administration, analysis)	\$59,500
Railroad worker interviews (development, administration, analysis)	\$108,000
TOTAL COST	\$167,500.00

15. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

These are new information collection requirements for a one-time survey/study. Therefore, there are no program changes or adjustments at this time.

16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT, INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

Begin data collection	ASAP
Data analysis	Ongoing, as data come in
Interim report to UP	Q3 2007
Data analysis	Ongoing, as data come in
Interim reports – other participating railroads	Keyed to dates of entry into C ³ RS
Final reports and publications	Q2 2010

Interview data will be content analyzed.

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.

FRA is not seeking an exemption. Once OMB approval is received, the FRA will publish the approval number for these information collection requirements in the **Federal Register**.

18. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19, "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS," OF OMB FORM 83-I.

No exceptions are taken at this time.

Meeting Department of Transportation (DOT) Strategic Goals

This information collection supports the top DOT strategic goal, namely transportation safety. If the proposed collection of information is not conducted, FRA will lose a unique opportunity to study the Confidential Close Call Reporting System (C³RS) and the issue of railroad worker injuries. FRA's main mission is to promote and enhance rail safety. Over the last several years, FRA has made a major policy commitment to improving safety in the railroad industry through innovative, human factors based programs. The agency has backed up this commitment with major funding for the C³RS program. The operating assumption behind C³RS is that by assuring confidentiality, employees will report events which, if dealt with, will decrease the likelihood of accidents. The evaluation of this program is designed to provide FRA with the guidance it needs regarding the expansion of this pilot program throughout the rail industry in order to reduce the number and severity of rail accidents/incidents that occur each year and the corresponding injuries and fatalities that rail workers experience. Without this needed guidance, the quality of the agency's C³RS decision will be severely degraded. Further, without this collection of information, FRA will be greatly hampered in meeting Departmental and agency goals to reduce rail worker injuries and fatalities caused by human factor errors.

The frequency of data collection is scheduled to conform to a methodology that will allow FRA's contractors to track change over time. Fewer data collection points than the ones proposed will make it difficult to discern patterns.

In sum, this collection of information supports FRA's mission, which is to promote and enhance rail safety throughout the United States. As always, FRA seeks to do its utmost to fulfill DOT Strategic Goals and to be an integral part of One DOT.