

**SUPPORTING STATEMENT  
FOR  
CONSOLIDATED CHILD RESTRAINT SYSTEM REGISTRATION, LABELING  
AND DEFECT NOTIFICATIONS**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

This information collection will provide manufacturers with registration information on each child restraint system (CRS) that in the event of a safety recall, manufacturers can provide direct notification to owners. In addition, this collection supports the United States Department of Transportation's (DOT) strategic goal in safety, by working towards the elimination of transportation related deaths and injuries involving children.

The National Highway Traffic Safety Administration (NHTSA) is authorized by 49 U.S.C. Subchapter II Standards and Compliance, sections 30111 and 30117, to issue Federal motor vehicle safety standards (FMVSS). The Secretary is authorized to issue, amend, and revoke such rules and regulations as she/he deems necessary. The Secretary is also authorized to require manufacturers to provide information to first purchasers of motor vehicles or motor vehicle equipment when the vehicle or equipment is purchased, in a printed matter placed in the vehicle or attached to or accompanying the equipment.

Using this authority, the agency issued the initial FMVSS No. 213 in 1971. Child restraint systems are devices used for protecting infants and young children in motor vehicle or aircraft crashes. The standard requires child restraints to be labeled with safety information and requires the devices to be accompanied by printed instructions. Instructions for built-in systems are to be printed in the vehicle's owner's manual.

On September 10, 1992, the standard was amended to require manufacturers of child restraint systems to register the owners of child restraints so that they may be directly contacted in a recall campaign. The standard requires:

- (a) A two-part perforated registration card. The first part contains a message and suitable instructions to be retained by the purchaser. The second part is to be returned to the manufacturer by the purchaser. The second part includes prepaid return postage, the pre-printed name/address of the manufacturer, the pre-printed model and date of manufacture, and spaces for the purchaser to fill in his/her name and address;
- (b) A permanently attached label on the child restraint which includes a statement providing mailing and telephone instructions (or, at the option of the manufacturer, a toll-free hotline telephone number) for non-original

owner registration and for re-registration, and the US Department of Transportation's Auto Safety toll-free hotline number for reporting and receiving safety-related information about the seat; and

- (c) A filing system containing child safety seat owners' names and addresses maintained by the child restraint manufacturer suitable for easy access in the event of a recall campaign. The registration records are to be maintained by the manufacturer for 6 years.

Other labeling requirements in FMVSS No. 213 include: i) warning against using the restraint in any vehicle position equipped with an air bag and, ii) and installation instructions for each child restraint system having components for attaching to the lower anchorages of a vehicle's child restraint anchorage system.

Child restraint system registration is an important part to protecting young children and infants. By registering child restraint systems, product manufacturers will be able to directly contact owners in the event of any safety recalls. The labeling requirements also ensure that CRS are properly used so that children are provided the best possible protection in the event of a crash.

**2. Indicate how, by whom, and for what purpose the information will be used.**

This collection requires child seat manufacturers to provide registration cards and safety labeling information for child seats. The registration information is maintained to notify owners of any safety recalls and remedy the problem. The labeling requirement provides important information on the safe and proper use of the child restraint system.

**3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.**

Child restraint manufacturers are permitted to add to the registration form: i) specified statements informing CRS owners that they may register online; and ii) the Internet address for registering with the company. For those CRS owners with access to the Internet, online registration may be a preferred method of registering a CRS.

An electronic means is available for downloading a substitute CRS registration form from NHTSA's Internet Web site.

The CRS labeling requirements do not involve collections of information. Manufacturers are free to use any technologies which they determine are most appropriate for meeting the labeling requirements of the standard.

Computer-based filing systems are currently being used by most CRS manufacturers in keeping child restraint registration records. Manufacturers are

required to maintain a file system of this information of their choice, but the standard does not require the use of electronic records.

**4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.**

NHTSA is the only Federal agency regulating child restraint systems. Only this agency requires manufacturers of child restraints to label them or to collect registration information covering names and addresses of owners of child restraints. Therefore, there is no duplication or similar information collected.

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

This regulation applies to all manufacturers of child restraint systems. In total, there are currently 15 manufacturers producing child restraint systems and none of which are considered small business entities.<sup>1</sup>

**6. Describe the consequence to Federal program and policy activities if the information is not collected or collected less frequently.**

If the information is not collected or collected less frequently, there is no assurance that child restraint owners will be given important safety information. The information currently provided on or with the restraint includes instructions on how to correctly use the restraint, and recommendations on which children are suitable for the restraint. Without this information, the effectiveness of child restraints could be greatly diminished.

The child restraint registration information enables manufacturers to directly contact child restraint owners to notify them of safety recalls. This better ensures that owners will hear about a recall and will remedy the safety problem with their systems. Failure to have the CRS registration information would result in more children being placed in defective child seats that should have been recalled, exposing these children to an unsafe condition.

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

There are no special circumstances requiring the labeling or owner registration requirements to be reported in a manner inconsistent with those specified in 5 CFR 1320.6.

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<sup>1</sup> According to the Small Business Administration (SBA) database listed at [http://dsbs.sba.gov/dsbs/search/dsp\\_dsbs.cfm](http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm).

**8. Attach the Federal Register document soliciting comments on extending the collection of information, and a summary of all public comments responding to the notice. Describe efforts to consult with persons outside the agency to obtain their views.**

The Federal register notice (72 FR 17598) is included as Attachment 1. It was published on April 9, 2007, and received no comments.

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

No payment or gift will be provided to any respondent.

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

This item does not apply. No assurances of confidentiality are given by the agency, since labeling is a part of the manufacturing process. The labeling requirements provide installation and use information. No confidential information is collected.

Registration names and addresses are voluntarily provided by consumers and used to contact owners in the event of a recall or safety notification. The substitute registration form provided by NHTSA has a statement authorizing the agency to provide the child safety seat registration information to the manufacturer. If written authorization is not provided, the personal identification information is not provided to the manufacturer.

**11. Provide additional justification for any questions that are commonly considered private.**

No commonly considered private questions are asked.

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

The total burden hours for this collection consist of: (1) The administrative hours spent to produce registration cards and labels, (2) the hours spent collecting registration information, and (3) the hours spent by CRS manufacturers to create and keep records. This consists of reporting hours shown below:

### **Annual Burden for Reporting**

Number of CRS Manufacturers (Respondents)	15
Number of CRS Produced Each Year	4,500,000
Number of Returned CRS Registrations Each Year*	1,575,000
Hours to prepare for each CRS registration**	0.025
Total hours to prepare CRS registrations (4,500,000 x 0.025 hrs)	112,500 hours
Hours to collect each returned registration	0.04
Total hours to collect registrations (1,575,000 x 0.04hrs)	63,000 hours
Hours to create and keep a record on each returned registration	0.02
Total hours to create and keep records (4,500,000 x 0.02 hours)	90,000 hours
Total annual burden hours (112,500 + 63,000 + 90,000)	265,500 hours***

\* Either by registration card, NHTSA registration form or by the Internet

\*\* Hours to cut/print, label and attach a registration card on each CRS

\*\*\* Given these estimates, the estimated total annual burden hours for this collection of information are **265,500 hours**. This number reflects the combination of 112,500 hours to produce materials (0.025 hours per seat × 4,500,000 child restraints), 63,000 hours to collect registrations (0.04 hours per seat × 1,575,000 registrations) and 90,000 hours to create and keep records (0.02 hours per seat × 4,500,000 child restraints) each year.

The total estimated cost associated with the burden hours are as follows; produce materials, gather data, and keep records is 5,310,000 (\$20/hr x 265,500 hours).

### **13. Provide estimates of the total annual cost to the respondents or record keepers.**

There is no additional cost to the respondents or record keepers.

### **14. Provide estimates of the annualized cost to the Federal government.**

The estimated cost to the Federal government associated with generating the form, printing the form, and covering expenses associated with postage to and from the agency is approximately \$5,855.50 per year ((Printing 3,500 forms at \$0.08 per form = \$280.00) + (Mailing 3,500 forms x \$0.46 per form for postage and surcharge = \$1,610.00) + (an annual record keeping cost of \$3,965.50 ((\$20 per hours x 0.057 hours per form) x (3,500 forms)) = \$5,855.50).

**15. Explain reasons for any program changes or adjustments reported in Item 13 or 14 of the OMB Form 83-1.**

This action consolidates OMB control numbers 2127–0511, “49 CFR 571.213, Child Restraint Systems,” and 2127–0576, “Child Safety Seat Registration,” into a new one titled, “Consolidated Child Restraint System Registration, Labeling and Defect Notifications”, which resulted in an increase adjustment to the total burden hours.

**16. For collections of information whose results are planned to be published, outline plans for tabulation, and publication.**

The collected data on the label, card, postage, attachment, and record keeping requirements will not be published for statistical use.

**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.**

Approval is not sought to not display the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-1.**

No exception is made to any of the items in the certification statement.