

**SUPPORTING JUSTIFICATION**  
**Safety Appliance Concern Recommendation Report;**  
**Guidance Checklist Forms**  
**FRA Form 6180.4(a)-(q)**

**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.**

This collection of information is a request for an extension of a currently approved submission. The Federal Railroad Administration (FRA) has revised the information in this collection – where appropriate and necessary – to reflect the most current data, and FRA’s experience over the past three years in implementing the requirements of this rule.

Background

FRA Federal and State inspectors monitor the safety of railroads in the United States, including freight, passenger, and commuter rail operations. The American railroad industry is a large and complex one. To accommodate this magnitude and complexity, FRA employs inspectors in five separate disciplines of expertise (Hazardous Materials, Motive Power & Equipment, Operating Practices, Signal & Train Control, and Track) throughout its eight regions nationwide. These inspector resources are very limited, and are supplemented by inspectors employed by states that choose to participate in FRA’s inspection program. Currently, there are approximately 130 Federal and State inspectors who handle Motive, Power, and Equipment (MP&E) safety issues and who inspect newly built freight cars. FRA estimates that it is able to monitor less than two-tenths of one percent of the safety-sensitive activity that occurs in the railroad industry (even with the additional state inspector resources).

There are approximately 10 freight car manufacturers, plus another five railroads/one-time contractors/sub-contractors that engage in freight car construction. Each year, there are approximately 30 to 50 different types of freight cars built by these manufacturers. Each type of car must be inspected for compliance with Federal safety regulations (49 CFR Part 231). The larger freight car builders and railroads normally request sample car inspections by FRA to determine that these new cars are in compliance with Federal requirements. After carefully reviewing its field inspectors’ work, FRA recently has found that newly constructed freight cars are not meeting these safety appliance standards. FRA discovered that the various types of cars being built by rail equipment manufacturers, railroads, and other contractors/sub-contractors had defects and

deficiencies. Moreover, these defects and deficiencies were missed primarily due to inconsistent inspections and misinterpretation of Federal safety regulations by MP&E inspectors. FRA realized that, unless these defects and deficiencies could be eliminated in a systematic way, there would be great risk for increased accidents/incidents in the everyday rail environment, as well as a corresponding increase in casualties (severe injuries and perhaps fatalities) to railroad employees and property damage.

In an ongoing effort to conduct more thorough and more effective inspections of newly built railroad freight equipment (cars) and to further enhance safe rail operations, FRA has developed a safety concern recommendation report form, and a group of safety appliance standards guidance checklist forms that serve to facilitate railroad, rail car owner, and rail equipment manufacturer compliance with agency railroad safety appliance standards regulations. In one of its Sample Car Training Program classes, FRA provided drafts of these new forms to approximately 18 inspectors. FRA found these forms filled a great need, and served to cut down on the very common problem of misinterpretation of Part 231 regulations. The Association of American Railroads (AAR), the Railway Products Institute (RPI), and the American Railway Car Builders Institute (ARCI) have repeatedly encouraged FRA to enhance and accelerate the courtesy sample car inspections provided by the agency.

In sum, FRA has introduced and now utilized these new forms nationwide so that FRA and State Motive, Power, and Equipment (MP&E) inspectors have an immediate, visual method to ensure that different types of newly constructed freight cars conform/are compliant with all requirements of the relevant section of Part 231.

**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 information collected is used by FRA and State Motive, Power, and Equipment inspectors (MP&E) to conduct more thorough and more effective sample car inspections of the various types of new rail freight cars constructed at manufacturing facilities. Also, the new forms are used to transmit vital information to freight car builders, owners, and railroads when exceptions are taken or to provide clarity to these organizations that certain freight equipment meets or does not meet the requirements spelled out in Part 231.

In particular, Form FRA F 6180.4a is used by State inspectors to identify systemic railroad concerns regarding safety equipment and fleet design deficiencies. It allows FRA and State field inspectors to gain compliance with the safety requirements of Part 231 without taking equipment (freight cars) out of service and thereby disrupting rail operations. Forms FRA F 6180.4(b)-(m) are used in conjunction with Form FRA F 6180.4, Special Inspection of Safety Appliance Equipment. They are used as guidance

checklists to determine – in an efficient and thorough way – whether newly built sample cars meet the requirements of Part 231. These forms assist FRA and State MP& E field inspectors to ensure that each required part of the Safety Appliance Standards (contained in Part 231) is followed by identification, measurements, and photographs. Specifically, Form FRA F 6180.4(b) is used to ensure that box and other house cars, built or placed in service before October 1, 1966, conform to the requirements of § 231.1. Form FRA F 6180.4(c) is used to ensure that hopper cars and high-side gondola cars with fixed ends conform to the requirements of § 231.2. Form FRA F 6180.4(d) is used to ensure that drop-end high-side gondola cars conform to the requirements of § 231.3. Form FRA F 6180.4(e) is used to ensure that fixed-end low-side gondola cars and low-side hopper cars conform to the requirements of § 231.4. Form FRA F 6180.4(f) is used to ensure that drop-end low-side gondola cars conform to the requirements of § 231.5. FRA F 6180.4(g) is used to ensure that flat cars conform to the requirements of § 231.6. FRA F 6180.4(h) is used to ensure that tank cars with side platforms conform to the requirements of § 231.7. FRA F 6180.4(i) is used to ensure that tank cars without side sills and tank cars with short side sills and end platforms conform to the requirements of § 231.8. FRA F 6180.4(j) is used to ensure that tank cars without end sills conform to the requirements of § 231.9. FRA F 6180.4(k) is used to ensure that tank cars without under frames conform to the requirements of § 231.21. FRA F 6180.4(l) is used to ensure that box and other house cars without roof hatches, built or placed in service after October 1, 1966, conform to the requirements of § 231.27. FRA F 6180.4(m) is used to ensure that box cars and other house cars with roof hatches, built or placed in service after October 1, 1966, conform to the requirements of § 231.28.

New forms FRA F 6180.4(n)-(q) will also be used in conjunction with Form FRA F 6180.4, Special Inspection of Safety Appliance Equipment. Form FRA F 6180.4n will be used to ensure that passenger-train cars with open-end platforms conform to the requirements of § 231.13. Form FRA F 6180.4o will be used to ensure that passenger-train cars without open-end platforms conform to the requirements of § 231.14. Form FRA F 6180.4p will be used to ensure that road locomotives with corner stairways built after October 1, 1979, conform to the requirements of § 231.29. Form FRA F 6180.4q will be used to ensure that locomotives used in switching service built after March 31, 1977, conform to the requirements of § 231.30.

In sum, FRA believes the use of these carefully developed forms contributes to improved construction of newly designed freight cars and improved field inspections of all freight cars currently in use by reducing, if not eliminating, the common problem of inconsistent inspections due to the misinterpretation of the Part 213 regulations by FRA and State field MP& E safety inspectors.

**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 highly encourages and strongly endorses the use of advanced information technology, and electronic record keeping, wherever possible, to reduce burden on respondents. In keeping with the requirements of the Paperwork Reduction Act (PRA) and the Government Paperwork Elimination Act (GPEA), FRA has placed all the Safety Appliance Forms on its Website for the convenience of users. Additionally, FRA plans to provide an Adobe or .PDF version of the all the forms so that they can readily be filled-out and electronically transmitted to the agency, when necessary.

It should be noted that the burden for this collection of information is extremely 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-I), DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.**

The collection of information will have an extremely minimal or no effect on small businesses/other small entities. As mentioned earlier, there are approximately 10 freight car manufacturers and an additional five railroads/one-time contractors/sub-contractors that engage in freight car construction. The total number of entities involved in the manufacture or re-manufacture (of the approximately 30 to 50 different types of freight cars) is a small one (15). Most of this limited number of manufacturers and other entities (railroads) are large size business concerns. The Safety Appliance Recommendation Report and Guidance Checklist Forms are used by FRA and State MP&E safety inspectors to conduct more efficient, consistent, and effective sample car inspections, as well as more efficient, consistent, and effective inspections of freight cars currently in use. Also, these forms are used to transmit vital information to freight car builders, owners, and railroads when exceptions are taken or to provide clarity to these organizations that the equipment meets or does not meet the requirements spelled out in Part 231.

Again, it should be noted that the burden for this collection of information is extremely

minimal.

**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 this information were not conducted or conducted less frequently, FRA's national rail safety program would be adversely impacted. Specifically, without this collection of information, FRA would have no means to ensure that FRA and State MP&E safety inspectors thoroughly and consistently inspect various types of newly built and re-manufactured freight cars (sample cars) to determine that they fully conform to the specific requirements of the appropriate section of 49 CFR Part 231 (*Railroad Safety Appliance Standards*) before they are placed in service. Without these forms, it is highly probable that FRA and State MP&E inspectors would continue to miss defects and deficiencies in newly constructed and retrofit re-manufactured freight cars because there is no other systematic and methodical way to check that each item on that type of car fully conforms to the appropriate section of the Appliance Standards regulation. Without this collection of information then, there is likely to be a greater risk that freight cars with defects and deficiencies are put into service by the nation's railroads. This could lead to greater numbers of accidents/incidents (e.g., derailments, collisions, mechanical breakdowns) that could cause increased casualties (severe injuries and fatalities) to American railroad workers.

In sum, this collection of information supports FRA's primary mission to promote and enhance national rail safety. FRA believes that performing the required freight car inspections more effectively, more accurately, more consistently, and more efficiently contributes to achieving this goal.

**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.**

There are no known special circumstances as related to the seven of the bulleted items. Sample car inspection information is traditionally held at FRA for a period of five years before moving to a storage location. With the advent and increased usage of electronic record keeping, FRA is currently considering reducing this storage time to three years.

All other information collection requirements then 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 November 19, 2007, soliciting comment on this particular information collection. *72 FR 65128*. FRA received no comments in response to this notice.

#### Background

As previously stated, FRA met with agency and State inspectors to develop and test these new forms. In one of its Sample Car Training Program classes, FRA found that the new forms proved extremely helpful and filled an important need for the inspectors because it provided a visual, tangible means by which they could methodically do their jobs in an efficient, consistent, and effective way. Also, the Association of American Railroads (AAR), the Railway Products Institute (RPI), and the American Railway Car Builders Institute (ARCI) have repeatedly encouraged FRA to enhance and accelerate the courtesy sample car inspections provided by the agency.

It should be noted that the Association of American Railroads (AAR) was provided a draft of all the new forms through the Equipment Engineering Committee's Safety Appliance Task Force to review these documents for format, content, and error. FRA welcomed their comments and suggestion regarding these important forms, and made changes, where appropriate.

**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 the information collection requirements associated with these forms.

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

No assurances of confidentiality are necessary or are made by the Federal Railroad Administration (FRA).

The information collected is not of a private nature.

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 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.**

*Respondent universe is estimated at 130 Federal and State Rail Safety Equipment Inspectors. Form FRA F 6180.4a is used by both the Federal and State inspectors. For the present, Forms FRA F 6180.4(b)-(m) are used by Federal Inspectors; however, FRA expects that State inspectors will use these forms sometime in the future. New forms FRA F 6180.4(n)-(q) will be used by Federal Inspectors. Again, FRA expects that State inspectors will use these forms sometime in the future. The cost associated with these forms is primarily a function of labor hours. FRA estimates that the average hourly wage rate for Federal and State safety inspectors is approximately \$58. (Since there are inspectors both at the GS-12 and GS-13 level, hourly rates were determined by averaging Step 5 wages for the two.) Hourly rates used to estimate Federal and State Safety inspector costs are derived by burdening OPM 2008 Federal General Schedule compensation rates 40 percent (see OPM's Website @ [www.opm.gov](http://www.opm.gov) for 2008 Salary Tables and Related Information).*

The burden hours and burden costs for the Motive, Power, and Equipment (MP&E) Safety Appliance Concern Recommendation Report, and each of the Safety Appliance Standards Guidance Checklist Forms are calculated as follows:

Form FRA 6180.4a - MPE Safety Concern and Recommendation Report

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually

Annual number of Responses: 30 forms

Annual Burden: 30 hours

Annual Cost: \$1,740

**Calculation:** 30 forms x 60 min. = 30 hours  
30 hrs. x \$58 = \$1,740

Form FRA 6180.4b - Safety Appliance Guidance Checklist Forms (Section 231.1)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually

Annual number of Responses: 10 forms

Annual Burden:

10 hours

Annual Cost:

\$580

**Calculation:** 10 forms x 60 min. = 10 hours  
10 hrs. x \$58 = \$580

Form FRA 6180.4c - Safety Appliance Guidance Checklist Forms (Section 231.2)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response: Annually

Annual number of Responses: 30 forms  
Annual Burden: 30 hours  
Annual Cost: \$1,740

**Calculation:** 30 forms x 60 min. = 30 hours  
30 hrs. x \$58 = \$1,740

Form FRA 6180.4d - Safety Appliance Guidance Checklist Forms (Section 231.3)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response: 60  
minutes

Frequency of Response: Annually

Annual number of Responses: 3 forms  
Annual Burden: 3 hours  
Annual Cost: \$174

**Calculation:** 3 forms x 60 min. = 3 hours  
3 hrs. x \$58 = \$174

Form FRA 6180.4e - Safety Appliance Guidance Checklist Forms (Section 231.4)

Respondent Universe:

130

Federal  
and  
State  
Inspect  
ors

Burden time per response: 60  
minutes

Frequency of Response: Annually

Annual number of Responses: 15 forms  
Annual Burden: 15 hours  
Annual Cost: \$870

**Calculation:** 15 forms x 60 min. = 15 hours  
15 hrs. x \$58 = \$870

Form FRA 6180.4f - Safety Appliance Guidance Checklist Forms (Section 231.5)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response: 60  
minutes

Frequency of Response: Annually

Annual number of Responses: 5 forms  
Annual Burden: 5 hours  
Annual Cost: \$290

**Calculation:** 5 forms x 60 min. = 5 hours  
5 hrs. x \$58 = \$290

Form FRA 6180.4g - Safety Appliance Guidance Checklist Forms (Section 231.6)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually

Annual number of Responses: 30 forms

Annual Burden: 30 hours

Annual Cost: \$1,740

**Calculation:** 30 forms x 60 min. = 30 hours  
30 hrs. x \$58 = \$1,740

Form FRA 6180.4h - Safety Appliance Guidance Checklist Forms (Section 231.7)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response: Annually

Annual number of Responses: 3 forms

Annual Burden: 3 hours

Annual Cost: \$174

**Calculation:** 3 forms x 60 min. = 3 hours  
3 hrs. x \$58 = \$174

Form FRA 6180.4i - Safety Appliance Guidance Checklist Forms (Section 231.8)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response: 60  
minutes

Frequency of Response: Annually

Annual number of Responses: 5 forms

Annual Burden: 5 hours

Annual Cost: \$290

**Calculation:** 5 forms x 60 min. = 5 hours  
5 hrs. x \$58 = \$290

Form FRA 6180.4j - Safety Appliance Guidance Checklist Forms (Section 231.9)

Respondent Universe:

130  
Federal  
and  
State

|   |         |         |                |
|---|---------|---------|----------------|
|   |         |         | Inspect<br>ors |
| Burden time per response:                       |         |         | 60<br>minutes  |
| Frequency of Response:                          |         |         | Annually       |
| Annual number of Responses:                     | 5 forms |         |                |
| Annual Burden:                                  |         | 5 hours |                |
| Annual Cost:                                    |         |         | \$290          |
| <br>  |         |         |                |
| <b>Calculation:</b> 5 forms x 60 min. = 5 hours |         |         |                |
| 5 hrs. x \$58 = \$290                           |         |         |                |

Form FRA 6180.4k - Safety Appliance Guidance Checklist Forms (Section 231.21)

Respondent Universe:

|   |          |          |  |
|---|----------|----------|--|
|   |          |          | 130<br>Federal<br>and<br>State<br>Inspect<br>ors |
| Burden time per response:                         |          |          | 60<br>minutes                                    |
| Frequency of Response:                            |          |          | Annually   |
| Annual number of Responses:                       | 10 forms |          |  |
| Annual Burden:                                    |          | 10 hours |  |
| Annual Cost:                                      |          |          | \$580  |
| <br>  |          |          |  |
| <b>Calculation:</b> 10 forms x 60 min. = 10 hours |          |          |  |
| 10 hrs. x \$58 = \$580                            |          |          |  |

Form FRA 6180.4l - Safety Appliance Guidance Checklist Forms (Section 231.27)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually

Annual number of Responses: 10 forms

Annual Burden:

10 hours

Annual Cost:

\$580

**Calculation:** 10 forms x 60 min. = 10 hours  
10 hrs. x \$58 = \$580

Form FRA 6180.4m - Safety Appliance Guidance Checklist Forms (Section 231.28)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually



Annual number of Responses: 10 forms  
 Annual Burden: 10 hours  
 Annual Cost: \$580

**Calculation:** 10 forms x 60 min. = 10 hours  
 10 hrs. x \$58 = \$580

**New Forms**

Form FRA 6180.4n - Safety Appliance Guidance Checklist Forms (Section 231.13)

Respondent Universe:

130  
 Federal  
 and  
 State  
 Inspect  
 ors

Burden time per response: 30  
 minutes

Frequency of Response: Annually

Annual number of Responses: 5 forms  
 Annual Burden: 3 hours  
 Annual Cost: \$174

**Calculation:** 5 forms x 30 min. = 3 hours  
 3 hrs. x \$58 = \$174

Form FRA 6180.4o - Safety Appliance Guidance Checklist Forms (Section 231.14)

Respondent Universe:

130  
 Federal  
 and

Burden time per response: State Inspect ors  
30 minutes

Frequency of Response: Annually

Annual number of Responses: 5 forms  
Annual Burden: 3 hours  
Annual Cost: \$174

**Calculation:** 5 forms x 30 min. = 3 hours  
3 hrs. x \$58 = \$174

Form FRA 6180.4p - Safety Appliance Guidance Checklist Forms (Section 231.29)

Respondent Universe:

130 Federal and State Inspect ors  
Burden time per response: 60 minutes

Frequency of Response: Annually

Annual number of Responses: 5 forms  
Annual Burden: 5 hours  
Annual Cost: \$290

**Calculation:** 5 forms x 60 min. = 5 hours  
5 hrs. x \$58 = \$290

Form FRA 6180.4q - Safety Appliance Guidance Checklist Forms (Section 231.29)

Respondent Universe:

130  
Federal  
and  
State  
Inspect  
ors

Burden time per response:

60  
minutes

Frequency of Response:

Annually

Annual number of Responses: 5 forms

Annual Burden:

5 hours

Annual Cost:

\$290

**Calculation:** 5 forms x 60 min. = 5 hours  
5 hrs. x \$58 = \$290

The total burden for this entire information collection is 182 hours.

- 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 IT 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.**

There are no additional costs to respondents other than those identified in Item 12 above.

- 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.**

There is no additional cost to the Federal government since its safety personnel conduct the required inspections as part of their normal duties, and this expense is covered under normal FRA's operating budget.

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

The total burden for this renewal information collection has decreased by *58 hours*. The decrease is due to both program changes and adjustments. The **program changes** include the addition of the following four new forms:

(1.) FRA F 6180.4n, *Safety Appliance Guidance Checklist Forms (Section 231.13)*. FRA estimates that there will be five (5) of these forms used annually, and that it will take approximately 30 minutes to complete the review associated with this form. This change *increased* the burden by *three (3) hours*.

(2.) FRA F 6180.4o, *Safety Appliance Guidance Checklist Forms (Section 231.14)*. FRA estimates that there will be five (5) of these forms used annually, and that it will take approximately 30 minutes to complete the review associated with this form. This change *increased* the burden by *three (3) hours*.

(3.) FRA F 6180.4p, *Safety Appliance Guidance Checklist Forms (Section 231.29)*. FRA estimates that there will be five (5) of these forms used annually, and that it will take approximately 60 minutes to complete the review associated with this form. This change *increased* the burden by *five (5) hours*.

(4.) FRA F 6180.4q, *Safety Appliance Guidance Checklist Forms (Section 231.30)*. FRA estimates that there will be five (5) of these forms used annually, and that it will take approximately 60 minutes to complete the review associated with this form. This change *increased* the burden by *five (5) hours*.

Overall, **program changes** *increased* the burden by *16 hours*.

As mentioned above, there were also **adjustments**. Specifically, FRA revised its estimates for the following forms:

(1.) FRA revised its annual estimate for Form FRA F 6180.4(a) from 50 forms to 30 forms. This change in estimate *decreased* the burden by *20 hours* (from *50 hours* to *30 hours*).

(2.) FRA revised its annual estimate for Form FRA F 6180.4(b) from 20 forms to 10 forms. This change in estimate *decreased* the burden by *10 hours* (from *20 hours* to *10 hours*).

(3.) FRA revised its annual estimate for Form FRA F 6180.4(c) from 20 forms to 30 forms. This change in estimate *increased* the burden by *10 hours* (from *20 hours* to *30 hours*).

(4.) FRA revised its annual estimate for Form FRA F 6180.4(d) from 10 forms to three (3) forms. This change in estimate *decreased* the burden by *seven (7) hours* (from *10 hours* to *three (3) hours*).

(5.) FRA revised its annual estimate for Form FRA F 6180.4(e) from five (5) forms to 15 forms. This change in estimate *increased* the burden by *10 hours* (from *five (5) hours* to *15 hours*).

(6.) FRA revised its annual estimate for Form FRA F 6180.4(h) from five (5) forms to three (3) forms. This change in estimate *decreased* the burden by *two (2) hours* (from *five (5) hours* to *three (3) hours*).

(7.) FRA revised its annual estimate for Form FRA F 6180.4(k) from 50 forms to 10 forms. This change in estimate *decreased* the burden by *40 hours* (from *50 hours* to *10 hours*).

(8.) FRA revised its annual estimate for Form FRA F 6180.4(l) from 25 forms to 10 forms. This change in estimate *decreased* the burden by *15 hours* (from *25 hours* to *10 hours*).

Overall, **adjustments** *decreased* the burden by *74 hours*.

The current burden for this information collection shows *240 hours*, while the total burden for this renewal submission amounts to *182 hours*. Hence, there is a decrease of *58 hours*.

There is no change in burden cost to respondents from the last submission.

**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.**

There are no plans for publication of this submission. The data will be used to conduct more thorough, more consistent, more efficient, and more effective inspections of rail freight equipment by FRA and State Safety inspectors.

**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.**

Once OMB approval is received, 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.

Department of Transportation (DOT) Strategic Goals

This information collection supports the main DOT strategic goal, namely transportation safety. Specifically, without this collection of information, FRA would have no means to ensure that FRA and State MP&E safety inspectors thoroughly and consistently inspect various types of newly built and retrofit re-manufactured freight cars (sample cars) to determine that they fully conform to the specific requirements of the appropriate section of 49 CFR Part 231 (*Railroad Safety Appliance Standards*) before they are placed in service. Without these new and previously approved forms, it is highly probable that FRA and State MP&E inspectors will continue to miss defects and deficiencies in newly constructed and retrofit re-manufactured freight cars because they do not have a systematic and methodical way to check that each item on that type of car fully conformed to the appropriate section of the Safety Appliance Standards regulation. Without this collection of information then, there is likely to be a greater risk that freight cars with defects and deficiencies are put into service by the nation's railroads. This could lead to greater numbers of accidents/incidents (e.g., derailments, collisions, mechanical breakdowns) that could cause increased casualties (severe injuries and fatalities) to American railroad personnel and the traveling public.

In sum, the collection of information supports both DOT's and FRA's main mission, which is to promote and enhance safe transportation throughout the United States, by serving to support more thorough, more accurate, more consistent, and more efficient rail freight safety car inspections.

In this information collection, as in all its information collection activities, FRA seeks to do its utmost to fulfill DOT Strategic Goals and to be an integral part of One DOT.