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## Supporting Statement

### **A. Justification**

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting number of deaths, injuries and economic losses resulting from motor vehicle crashes on the Nation's highways. In support of this mission, NHTSA is seeking a revision of a currently approved collection (OMB 2127-0646), which is due to expire on June 30, 2008, to assess the effectiveness of interventions designed to increase safety belt use and reduce impaired driving. Specifically, NHTSA proposes to conduct a series of telephone surveys that will examine the effectiveness of multiple National *Click It or Ticket* mobilizations and impaired driving crackdowns, as well as examine the effectiveness of State demonstration projects designed to curb impaired driving and/or raise belt use. The telephone surveys would be conducted during the mid 2008 to mid 2011 time period. Since Congress has authorized NHTSA to spend millions of dollars annually to conduct National mobilizations and smaller demonstration projects, which could be at the regional, State, county or local levels, NHTSA must account for whether these initiatives were effective. An essential part of this evaluation effort is to compare baseline and post-intervention measures of attitudes, intervention awareness, and (relevant) self-reported behavior to determine if the interventions were associated with changes on those indices.

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

#### **A.1. Explain the circumstances that make the collection of information necessary. Identify any Legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

##### ***a. Circumstances making the collection necessary***

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

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

Combating impaired driving and raising safety belt use are key components of the Department of Transportation's strategic goal of safety by eliminating transportation-related deaths and injuries. The DOT performance goal is to reduce highway-related fatalities to no more than 1.0 per 100 million vehicle miles traveled (VMT) by the end of 2008. To reach this goal, NHTSA has established GPRA goals that incorporate intermediate outcome measures, which include (a) reducing the rate of alcohol-related (0.01+ BAC) highway fatalities per 100 million VMT to 0.47 by 2009 and (b) increasing safety belt use to 85 percent by 2009.

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

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

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

As the highway safety arm of the Department of Transportation, NHTSA has a responsibility to collect these data. NHTSA proposes to conduct a series of National and

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

***b. Statute authorizing the collection of information***

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

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

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

The telephone surveys will provide NHTSA with data necessary to track the success of safety belt and impaired driving enforcement mobilizations, as well as provide effectiveness information on other demonstration projects that use innovative methods to reduce impaired driving and/ or increase safety belt use. For each intervention, data collected prior to intervention implementation (baseline survey) will be compared to data collected at the conclusion of the intervention in order to detect any changes in attitudes, awareness, or reported behavior associated with the intervention. Where appropriate, one or more interim survey waves may be added so that data for different phases of intervention implementation can be compared.

The results of the analyses described above will be used by NHTSA to assess the effectiveness of the mobilizations (or other campaigns) and determine where refinements or resource adjustments are needed. Demographic data collected by the surveys will be

used to identify if the interventions are having a differential impact across major population groups, and the nature of those differences.

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

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

NHTSA reports are available to the general public on our web site. Many of NHTSA's reports are accompanied by a press release. In these cases, the press reports our results to the general public.

**A.3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or other information technology. Also describe any consideration of using information technology to reduce burden.**

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

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

The CATI system lists questions and corresponding response categories automatically on the screen, eliminating the need for interviewers to track skip patterns and flip pages. Moreover, the interviewers enter responses directly from their keyboards, and the information is automatically recorded in the computer's memory.

CATI systems typically include safeguards to reduce interviewer error in direct key entry of survey responses. CATI also allows the computer to perform a number of critical assurance routines that are monitored by survey supervisors, including tracking average

interview length, refusal rate, and termination rate by interviewer; and performing consistency checks for inappropriate combination of answers.

**A.4. Describe efforts to identify duplication. Show specifically why any similar information, already available cannot be used or modified for use for the purposes described in Item 2 above.**

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

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

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

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

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

The timing of the mobilizations will determine the timing of the National and State telephone surveys. The evaluation approach will follow a basic pre/post design where data are collected immediately preceding and at the conclusion of the interventions. In certain cases, there may also be interim survey waves. The purpose of the interim waves would be to assess how different phases of an intervention affected the targeted audiences. For example, a mobilization may begin with one or more weeks strictly of media, with police enforcement initiated during a subsequent week. An interim survey wave might be introduced to examine the impact of the media on the public prior to introduction of the enforcement component. Alternatively, a demonstration project may involve a series of independent activities over time. Interim survey waves might be used

to evaluate one or more discrete activities within the project. Whether interim waves are utilized will depend on the importance to safety goals and funding decisions of determining the impact of selected activities on their intended audiences during the course of an intervention.

A central component of NHTSA's high visibility enforcement campaigns is paid media. A media buy for a single State includes buying within several markets. In order to determine the best media buy value for a State, the states are NHTSA is buying media at different levels in each market in order to help States identify the optimum point of return on their media dollars. Surveying public awareness by media markets is necessary for this analysis.

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

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

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

FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice (Vol. 72, No. 226, Pages 66026-66028) which announced NHTSA's intention to revise the previously approved collection of information (OMB2127-0646) is provided in Appendix B. The following comment on the Federal Register Notice, which was received on November 26, 2007:

*“this form and report is not necessary. shut down this bureau and save taxpayer dollars. the states do this. that is enough. taxpayers should not be paying on two levels for agencies to do the same thing. taxpayers simply do not need this information. this dept has grown too big and is far too ineffective in enforcing safety anyway.”*

NHTSA's position is that this data collection supports enforcement efforts to increase safety belt use and reduce impaired driving. Data from these surveys is needed to identify (a) groups of individuals for targeted enforcement campaigns, and (b) to assess the effectiveness of these mobilizations.

A copy of a second Federal Register Notice (Vol. 73 No. 21 Page 5905), which announced that this information collection request has been forwarded to OMB, is also provided in Appendix B.



EXPERT CONSULTATION: NHTSA staff designed the mobilization survey instruments based on the key characteristics of the “Click It or Ticket” and the National alcohol crackdown mobilizations. This included consultation with the States concerning characteristics of their mobilization activities and how they would be assessed.

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

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

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

In the surveys’ introduction, respondents are informed that participation is voluntary, and their answers are anonymous and will be used only for statistical purposes. These surveys do not collect identifying information such as names, addresses, telephone numbers, or social security numbers. Upon completion of these surveys, it would be impossible for anyone to be identified based on his or her responses to our questions. Furthermore, our contractor does not tie the responses to these surveys with the telephone numbers called.

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

We acknowledge that collecting information on drinking and driving is a sensitive issue for the public. However, this information is important to collect in order for NHTSA to determine the success of our programs. In addition, driving on roads and drinking in bars and restaurants are often seen as public activities. The questions are not probing. Instead, they request basic information on behavior and are geared more towards attitudes, perceptions and awareness of our mobilizations. Given the perceived sensitive nature of this information, our questions are phrased in a neutral/ nonjudgmental fashion.

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

NHTSA estimates that respondents will require an average of ten minutes to complete the telephone interviews. Over a three year period, the proposed information collection will survey 494,400 respondents for 10 minutes each, which is a total of 82,400 interview hours. The total estimated burden for all anticipated occupant protection and impaired driving projects for the three-year period from July 1, 2008 to June 30, 2011 is shown in a table below.

TABLE 1

Survey Name	Pre N	Post N	Survey Waves per year (Pre and Post = 2 Waves)	Sites	Total Respondents	Burden Hours*
National Alcohol Crackdown	1600	1600	4	1	6,400	1,067
National Seat Belt Mobilization	1600	1600	4	1	6,400	1,067
Click It or Ticket: The Next Generation	500	500	8	4	16,000	2,667
Teen Seat Belt Demonstration Project	500	500	8	10	40,000	6,667
Seat Belt Demonstration Project in Rural Areas	500	500	8	6	24,000	4000
Combined Alcohol and Seat Belt Enforcement Demonstration Projects	500	500	8	6	24,000	4000
High Visibility Alcohol Enforcement Demonstration Projects	500	500	8	6	24,000	4000
High Risk Population Alcohol Demonstration Projects	500	500	8	6	24,000	4000
<b>Annual Burden</b>					<b>164,800</b>	<b>27,468</b>
<b>3-Year Burden</b>					<b>494,400</b>	<b>82,404</b>

\* Numbers are rounded

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

Economic Statistics Division Last Revised: January 13, 2006), the total respondent cost for the annual survey period would be:

$$\text{\$11.92 per hour} \times 27,468 \text{ interviewing hours} = \text{\$327,418.56}$$

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

$$\text{\$11.92 per hour} \times 82,404 \text{ interviewing hours} = \text{\$982,255.68}$$

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

**National Surveys**

SEC. 2009 of Public Law 109-59 (SAFETEA-LU) directed NHTSA to evaluate two National high-visibility traffic safety law enforcement campaigns annually. Each of these mobilizations are twice a year. These annual mobilizations are the “Click It or Ticket” (CIOT) safety belt enforcement mobilization in May and November, and an alcohol mobilization in August and December. Telephone surveys are a critical part of assessing the impact of these interventions. The questionnaires are included as Attachments C1 and Attachment C2.

For each national mobilization, there will be two waves, a pre- survey and a post survey, which combined will measure the effect of the mobilization. Each survey wave for the safety belt mobilization will consist of 1600 respondents (1200 respondents from a representative sample of the general population age 18 and older with an additional over-sampling of 400 from media target group of males ages 18 to 34). Each survey wave for the alcohol mobilization will consist of 1600 respondents (1200 respondents from a representative sample of the general population age 18 and older who have drunk alcohol within the last year with an additional over-sampling of 400 from media target group of males ages 18 to 34 who have drunk alcohol within the last year). Each year, NHTSA is planning four surveys for its national mobilizations: two national safety belt mobilization and two national alcohol mobilizations.

**TABLE 2**  
**Participants    Burden Hours    Respondent Costs**

<b>Annual Safety Belt Survey</b>	<b>6,400</b>	<b>1,067</b>	<b>\\$12,714.67</b>
<b>Annual Alcohol Surveys</b>	<b>6,400</b>	<b>1,067</b>	<b>\\$12,714.67</b>
<b>Total</b>	<b>12,800</b>	<b>2,134</b>	<b>\\$25,429.33</b>
<b>Safety Belt Surveys 3 Year Total</b>	<b>19,200</b>	<b>3,200</b>	<b>\\$38,144.00</b>
<b>Alcohol Surveys 3 Year Total</b>	<b>19,200</b>	<b>3,200</b>	<b>\\$38,144.00</b>
<b>Total</b>	<b>38,400</b>	<b>6,400</b>	<b>\\$76,288.00</b>

## **Demonstration Projects using the Occupant Protection Survey: Agency Form Number NHTSA1010**

### *Click It or Ticket: The Next Generation*

This demonstration project will evaluate the effectiveness of four quarterly high-visibility seat-belt enforcement campaigns, which use paid and earned media to reinforce the "Click It or Ticket" brand. Virginia, Iowa, and Pennsylvania participated in this project in 2006 and 2007. During the next three years, NHTSA anticipates no more than one State will participate in this project in any year. Pre and post mobilization surveys will be conducted in up to 4 media markets within the State (1 control site and 3 experimental sites) 4 times within one year (a maximum of 8 survey waves). Sample sizes per media market site will be up to 500 from a representative sample of the general population age 18 and older. The surveys will collect information on belt use, perceived enforcement of safety belt laws and message recognition.

### *Teen Seat Belt Demonstration Project*

These demonstration projects will evaluate the effectiveness seat belt enforcement strategies aimed at teenage drivers and passengers. These projects will be conducted at sites composed of a community, a county, or a media market depending on the specific characteristics of the intervention decided upon by the participating States; New Mexico, Oklahoma, Texas, Louisiana and Mississippi. The interventions will vary according to the approach towards combining enforcement of seat belt, the nature and level of media attached to the intervention, and the intervention schedule. Pre/post surveys will be conducted in the demonstration and control sites within each state a maximum of 4 times per year (a maximum of 8 survey waves in a maximum of 10 sites). Sample size per site per survey wave will be up to 500 from a representative sample of the general population 18 and older. The surveys will collect information on seat belt use, driving behavior, perceived enforcement of seat belt and message recognition.

### *Seat Belt Demonstration Project in Rural Areas*

These demonstration projects will evaluate the effectiveness of conducting high visibility seat belt enforcement campaigns in rural areas of States with high unbelted fatality rates. These projects will be conducted at rural sites composed of a community, a county, or a media market depending on the specific characteristics of the intervention decided upon by the participating States; Florida, Georgia and Tennessee. The interventions will vary according to the approach towards combining enforcement of seat belt, the nature and level of media attached to the intervention, and the intervention schedule. Pre/post surveys will be conducted in the demonstration and control sites within each state a maximum of 4 times per year (a maximum of 8 survey waves, in a maximum of 6 sites). Sample size per site per survey wave will be up to 500 from a representative sample of the general population 18 and older. The surveys will collect information on seat belt use, driving behavior, perceived enforcement of seat belt and message recognition.

## **Projects using the Impaired Driving Survey: Agency Form Number NHTSA1011**

### *Combined Alcohol and Seat Belt Enforcement Demonstration Projects*

These demonstration projects will evaluate the effectiveness of combined alcohol and seat belt enforcement strategies. They will be conducted at sites composed of a community, a county, or a media market depending on the specific characteristics of the intervention and who will implement the intervention. There will be a maximum of 6 sites selected per year. The interventions will vary according to the approach towards combining enforcement of seat belt and drinking and driving laws, the nature and level of media attached to the intervention, and the intervention schedule. Pre/post surveys will be conducted at each site a maximum of 4 times per year (a maximum of 8 survey waves). Sample size per site per survey wave will be 500 from a representative sample of the general population 18 and older. The surveys will collect information on seat belt use, alcohol use, reported drinking and driving behavior, perceived enforcement of seat belt and drinking and driving laws, and message recognition.

### *High Visibility Alcohol Enforcement Demonstration Projects*

These demonstration projects will evaluate the effectiveness of specific approaches to conducting high visibility enforcement of drinking and driving laws. This will include assessment of approaches to conducting sobriety checkpoints, such as approaches to increasing the visibility of sobriety checkpoints or examining reinforcement schedules when using sobriety checkpoints. The interventions will be conducted at sites composed of a community, a county, or a media market depending on the specific characteristics of the intervention and who will implement the intervention. There will be a maximum of 6 sites selected per year. Pre/post surveys will be conducted at each site a maximum of 4 times per year (a maximum of 8 survey waves). Sample size per site per survey wave will be 500 from a representative sample of the general population 18 and older. The surveys will collect information on alcohol use, reported drinking and driving behavior, perceived enforcement of drinking and driving laws, and message recognition.

### *High Risk Population Alcohol Demonstration Projects*

These demonstration projects will evaluate the effectiveness of specific approaches to increasing the adherence of high risk populations to the drinking and driving laws. High risk populations will be defined by age, sex, or some other high risk demographic associated with drinking and driving behavior; or may alternatively be defined by a non-demographic factor (such as geography) associated with drinking and driving behavior. The interventions will be conducted at sites composed of a community, a county, or a media market depending on the targeted population and who must implement the intervention. There will be a maximum of 6 sites selected per year. Pre/post surveys will be conducted at each site a maximum of 4 times per year (a maximum of 8 survey waves). Sample size per site per survey wave will be 500 from a representative sample of the targeted population. The surveys will collect information on alcohol use, reported drinking and driving behavior, intervention awareness, and message recognition.

Table 3

	Demonstration Projects Requiring Surveys	Participants	Burden Hours	Respondent Costs
<b>Annual Totals</b>	Click It or Ticket: The Next Generation	16,000	2,666.67	\$31,786.67
	Teen Seat Belt Demonstration Project	40,000	6,666.67	\$79,466.67
	Seat Belt Demonstration Project in Rural Areas	24,000	4,000.00	\$47,680.00
	Combined Alcohol and Seat Belt Enforcement Demonstration Projects	24,000	4,000.00	\$47,680.00
	High Visibility Alcohol Enforcement Demonstration Projects	24,000	4,000.00	\$47,680.00
	High Risk Population Alcohol Demonstration Projects	24,000	4,000.00	\$47,680.00
	Annual Total	152,000	25,333.34	\$301,973.41
<b>3 Year Total</b>	Click It or Ticket: The Next Generation	48,000	8,000	\$95,360.00
	Teen Seat Belt Demonstration Project	120,000	20,000	\$238,400.00
	Seat Belt Demonstration Project in Rural Areas	72,000	12,000	\$143,040.00
	Combined Alcohol and Seat Belt Enforcement Demonstration Projects	72,000	12,000	\$143,040.00
	High Visibility Alcohol Enforcement Demonstration Projects	72,000	12,000	\$143,040.00
	High Risk Population Alcohol Demonstration Projects	72,000	12,000	\$143,040.00
	3 Year Total	456,000	76,000	\$905,920.00

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

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

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

Based on the 2005-2008 Buckle-Up America Surveys, which cost \$22 per survey, the government estimates the cost of these proposed studies, with adjustment for inflation, to be \$24 per survey. A maximum, of 164,800 persons will be interviewed during each of the survey years. Therefore, the estimated average annual cost to the government would be:

- 164,800 interviews X \$24 = \$3,955,200 /Year

This cost includes the following components:

- National: 12,800 Interviews X \$24 = \$307,200
- Demonstration 152,000 Interviews X \$24 = \$3,648,000

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

Because NHTSA has been directed by Congress to conduct high visibility enforcement programs, the occupant protection and impaired driving programs increasingly rely on paid media. NHTSA needs to conduct surveys to evaluate the public awareness of our programs and reach of our messages. This increase in burden hours reflects the need to evaluate the increasing number of programs that are using paid media to target specific groups of people and geographic areas. For Example, NHTSA is refining the Click It or Ticket high visibility seat belt enforcement model by implementing quarterly, rather than annual mobilizations. The intensive media efforts need to be evaluated so the best value for the media purchases can be obtained. Otherwise we risk over buying or under buying media.

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

Weighted frequencies will be computed for each of the questions in the surveys. Statistical tests, such as chi square, will be computed to compare pre-intervention and

post-intervention measures to ascertain any statistically significant differences. Findings will be included in technical reports printed by NHTSA and distributed to traffic safety officials at the national, State and local levels, as well as other interested persons. In addition, findings will be disseminated through briefings and presentations to traffic safety officials and other interested parties.

**A.17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

NHTSA will display the expiration date for OMB approval.

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

No exceptions to the certification are made.



**B. Collections of Information Employing Statistical Methods**

The proposed information collection will employ statistical methods to analyze the data collected from respondents. The following sections describe the procedures for respondent sampling and data tabulation.

**B.1. Describe the potential respondent universe and any sampling or other respondent selection to be used.**

The potential universe for these surveys includes all non-institutionalized adults in telephone households within the United States. With the exception of the Teen seat Belt demonstration project where NHTSA will survey teens (subject to institutional review board approval), adults are defined as persons aged 18 or older. The target population is 18 years and older because of the expense and limitations of getting institutional review board approval for administering surveys to drivers age 16 and 17 years olds. In addition because of the modest size of the national and State samples, the number of 16 and 17 year old that we would survey would be too small to be of any analytic value and justify the added expense of getting IRB approval.

This information collection will encompass multiple National samples and State samples. The sample will be distributed according to Table 4 followed by a more detailed description of each sample.

TABLE 4

<b>Participants</b>			
	National Surveys	Demonstration Surveys	Total Participants
Annual	12,800	152,000	164,800
3 Year Total	38,400	456,000	494,400
<b>Interview Hours</b>			
	National Surveys	Demonstration Surveys	Total Hours
Annual	2,133	25,333	27,467
3 Year Total	6,400	76,000	82,400

**National Surveys**

National samples will be required for both safety belt and impaired driving mobilization interventions. Two national safety belt mobilization and two national impaired driving mobilizations will be evaluated each year. For each mobilization, a pre-test (baseline) national sample and a post-test national sample of 1600 respondents will be surveyed (1200 respondents from a representative sample of the general population age 18 and older with an additional over-sampling (N=400) from media target group of males ages 18 to 34). Thus, the national sample for the proposed information collection would be:

$$(1600 \text{ respondents pre-mobilization} + 1600 \text{ respondents post-mobilization}) \times 4 \text{ mobilizations (2 Alcohol Mobilizations} + 2 \text{ safety Belt mobilization)} \times 3 \text{ Years} = 38,400 \text{ respondents}$$

Respondents for each national survey wave will be drawn from a national probability sample of households selected through a random digit dialing (RDD) sampling process<sup>1</sup>. This number is sufficiently large to permit pre/post comparisons within reasonable bounds of sampling error as well as permit sub-sample analyses of some major demographic characteristics (e.g., age and sex). Screening criteria for age eligibility would be age 18 and older. Additional criteria will be used for the alcohol mobilization to restrict sampling to drivers, age 18 years old and older, who have consumed alcohol within the last year. The sample will be stratified according to four Census Regions: Northeast, Midwest, South, and West (see Table 6 for expected sample distribution and sampling error). Residents from all 50 States and the District of Columbia would be eligible for the sample. In total, 38,400 respondents will be used for the National Surveys over a three year period.

**Table 6**  
**2006 Projected Regional Census Population Age 18+**  
**By U.S. Census Region, Completed Sample Size and Sample Error**

Regions	States	Population	Proportion	Completed Sample N	*Sampling Error
US	50 States and DC	224,365,151	100.00%	1200	2.8%
Northeast	CT, MA, ME, NH, NJ, NY, PA, RI, VT	42,181,438	18.80%	225	6.5%
Midwest	IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, WI	49,887,732	22.24%	267	6.0%
South	AL, AR, DE, DC, FL, GA, KY, LA, MD, MS, NC, OK, SC, TN, TX, VA, WV	81,267,256	36.22%	435	4.7%
West	AK, AZ, CA, CO, HI, ID, MT, NV, NM, OR, UT, WA, WY	51,028,725	22.74%	273	5.9%

\* Computed from the equation  $1.96 \times \sqrt{p(q)/(n-1)}$  where 1.96 is the z score at the 95% confidence level, p is the proportion of the sample displaying a particular characteristic (using the maximum value of the simple random sampling variance, or 50%), q equals (1-p), and n is the sample size.

Source: File 2. Interim State Projections of Population for Five-Year Age Groups and Selected Age Groups by Sex: July, 1 2004 to 2030. U.S. Census Bureau, Population Division, Interim State Population Projections, 2005.

<sup>1</sup> In 2007, our office conducted an experimental cell phone only study at the behest of OMB that compared a RDD sample with a cell phone only sample. The results of this study led to a decision not introduce cell phone sample into the MVOSS because of the design effects. We are continuing to study the cell phone issue, but believe the decision made with respect to MVOSS is still applicable for the next few years.

**Demonstration Project Surveys**

For each Demonstration project, a pre-test (baseline) sample and a post-test sample of up to 500 respondents per designated site sample will be surveyed. Sampling sizes will be sufficiently large so that sampling error is no greater than + 5 percentage points on questions administered to all respondents. Respondents will be selected from residential telephone exchanges covering the geographic area receiving the demonstration project intervention, using systematic procedures for sampling from exchanges and a random digit dialing (RDD) process for selecting numbers to call from sampled blocks of phone numbers. Age eligibility will depend on the nature of the intervention being evaluated. If the intervention is being directed at a youth population (i.e., under age 18), then the survey contractor shall first be required to undergo formal review and approval of methods by an Institutional Review Board certified by the Department of Health and Human Services.

Under this category, NHTSA is planning surveys for the following projects (described in detail in Section A.12.):

	Table 7 Annual	3 Year Total
• Click It or Ticket: The Next Generation	16,000	48,000
• Teen Seat Belt Demonstration Project	40,000	120,000
• Seat Belt Demonstration Project in Rural Areas	24,000	72,000
• Combined Alcohol and Seat Belt Enforcement Demonstration Projects	24,000	72,000
• High Visibility Alcohol Enforcement Demonstration Projects	24,000	72,000
• High Risk Population Alcohol Demonstration Projects	24,000	72,000

A total of 456,000 respondents will be used for the demonstration project surveys over a three-year period.

**Total Sampling Needs**

Overall, the total sample needs are 164,800 respondents annually, which would be 494,400 respondents over a three-year period. Since all the surveys are estimated to be 10 minutes in length, the estimated annual time is 27,467 hours interviewing, which would be or 82,400 hours over a three-year period.

**Sampling Error**

The confidence interval for sample estimates of population proportions, using simple random sampling without replacement, is calculated by the following formula:

Where:

$$z * \left[ se(x) = \sqrt{\frac{(p * q)}{(n - 1)}} \right]$$

se (x) = the standard error of the sample estimate for a proportion

p = some proportion of the sample displaying a certain characteristic or attribute

q = (1 - p)

n = the size of the sample

z = the standardized normal variable, given a specified confidence level (1.96 for samples of this size)

To test whether or not a difference between two sample proportions is statistically significant, a rather simple calculation can be made. The maximum expected sampling error (i.e., confidence interval in the previous formula) of the first sample is designated **s1** and the maximum expected sampling error of the second sample is **s2**. The sampling error of the difference between these estimates is **sd** and is calculated as:

$$sd = \sqrt{(s1^2 + s2^2)}$$

- For comparison of two samples of 500 each, a difference would have to exceed 6.2 percentage points to be statistically significant (with the conservative estimate of p=q).
- For comparison of two samples of 1200 each, a difference would have to exceed 4.0 percentage points to be statistically significant (with the conservative estimate of p=q).
- For comparison of two samples of 1600 each, a difference would have to exceed 3.5 percentage points (with the conservative estimate of p=q).

We believe that this is sufficient for our purpose to assess the impact of the mobilizations

**B.2. Describe the procedures for the collection of information.**

The proposed surveys will be administered using a pre-/post-test design to examine the changes that occur as a result of specific safety belt and impaired driving interventions. The National and State mobilization surveys will be conducted on a schedule corresponding with the fixed annual dates for the national mobilizations. The demonstration project surveys will be conducted on a more variable schedule that will depend on the timing and sequencing of the components of each demonstration project.

*National Mobilization Surveys*

At the national level, data collected from random samples of 1600 people before and after the mobilizations will be compared to examine changes in awareness, attitudes and self-reported behavior.

The proposed national survey samples are based on a modified stratified random digit dialing method, using a geographically stratified RDD sample rather than a single-stage/RDD sample. There are several important advantages to using a geographically stratified base for the RDD sample: (1) it draws the sample proportionate to the geographic distribution of the target population rather than the geographic distribution of telephone households, which is vital to constructing unbiased population estimates from telephone surveys; (2) it allows greater geographic stratification of the sample to control for known geographic differences in non-response rates; and (3) it facilitates the use of Census estimates of population characteristics to weight the computed sample to correct for other forms of sampling bias

The initial stage of the sample construction process requires the development of a national area probability sample based upon the distribution of the target population for this study, i.e. the non-institutionalized population age 18 and older in the United States. The estimated distribution of the population age 18 and older was calculated on the basis of projected 2006 data from the U.S. Census Bureau, (Table 6 shows the distribution of the population age 18 and older according to the census regions, the proportionate sample size for each region, and the sampling error).

Once the sample has been geographically stratified with sample allocation proportionate to population distribution, a sample of assigned telephone banks will be randomly selected from an enumeration of the Working Residential Hundreds Blocks of the active telephone exchanges within the region. The Working Hundreds Blocks are defined as each block of 100 potential telephone numbers within an exchange that includes 3 or more residential listings. (Exchanges with one or two listings are excluded because in most cases such listings represent errors in the published listings.)

In the third stage sample, a two-digit number is randomly generated by computer for each Working Residential Hundreds Block selected in the second stage sample. This third stage sampling technique is known as random digit dialing (RDD). Every telephone number within the Hundreds Block has an equal probability of selection, regardless of whether it is listed or unlisted. The use of RDD sampling eliminates the otherwise serious problem of unlisted telephone numbers.

The sample construction described above yields a population-based, random digit dialing sample of telephone numbers. The systematic dialing of those numbers to obtain a residential contact should yield a random sample of telephone households. During the fourth stage of sampling, a random selection procedure will be used to select one designated respondent for each household sampled. The “most recent/next birthday method” will be used for within household selection among multiple eligible respondents. Salmon and Nichols (1983<sup>2</sup>) proposed the birthday selection method as a less obtrusive method of selection than the traditional grid selections of Kish, et al. In theory, birthday selection methods represent true random selection (Lavrakas, 1987<sup>3</sup>). Empirical studies

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<sup>2</sup> Salmon, C. and Nichols, J. *The Next-Birthday Method of Respondent Selection*. Public Opinion Quarterly, 1983, Vol. 47, pp. 270-276.

<sup>3</sup> Lavrakas, P. *Telephone Survey Methods: Sampling, Selection and Supervision*. Beverly Hills: Sage Publications, 1987.

indicate that the birthday method produces shorter interviews with higher response rates than grid selection (Tarnai, Rosa and Scott, 1987<sup>4</sup>).

Upon contacting the household, interviewers will briefly state the purpose of their call (including noting the anonymity of the interview), and then request to speak to the person in the household within the eligible age range who has had the most recent birthday, or will have the next birthday. The CATI system will randomly rotate whether the interviewer asks for the most recent or next birthday. If the person who answered the phone is the selected respondent, then the interviewer will proceed with the interview. If the selected respondent is someone else who then comes to the phone, then the interviewer will again introduce the survey (with anonymity statement) and proceed with the interview. If the selected respondent is not available, then the interviewer will arrange a callback.

#### *Demonstration Surveys*

The major differences between national and State Click It or Ticket Next Generation sample selection procedures will be sample size and the absence in most cases of Stage 1 distribution of sample by geographic stratification. Otherwise, sampling procedures will mirror the same procedures described above for selecting the national samples (i.e., Stages 2-4). The national and State samples will be selected independently. As indicated in Section B1, NHTSA may determine that some level of stratification is desirable for analytic purposes. Therefore, sample generation for one or more States could include some form of Stage 1 distribution of sample by geographic stratification.

Other demonstration projects will typically be directed towards a community, a county or a media market composed of multiple counties. The residential telephone exchanges covering the geographic area undergoing the intervention will be determined, and a systematic procedure for randomly selecting telephone numbers to call will be implemented. Demonstration project surveys may require more screening criteria than age as interventions may be directed at very specific subgroups within the community. In-house selection methods will be conducted that obtain scientifically valid random samples.

#### *Data Collection Procedures across Samples*

Data collection will be conducted by trained interviewers working in telephone research centers that utilize a computer-assisted telephone interviewing (CATI) network. The CATI network will have capability for silently monitoring the performance of interviewers. Monitoring will be conducted by supervisory staff during all interview shifts to determine the quality of interviewer's performance in terms of:

1. Initial contact and recruitment procedures;
2. Reading the questions, fully and completely as written;

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<sup>4</sup> Tarnai, J., Rosa, E. and Scott, L. *An Empirical Comparison of the Kish and the Most Recent Birthday Method for Selecting a Random Household Respondent in Telephone Surveys*. Presented at the Annual Meeting of the American Association for Public Opinion Research. Hershey, PA, 1987.

3. Reading response categories, fully and completely, (or not reading them) according to the study specifications;
4. Whether or not open-ended questions are properly probed;
5. Whether or not the interviewer enters the correct code, number, or verbatim response to the question;
6. Whether or not ambiguous or confused responses are clarified
7. How well questions from the respondent are handled without alienating the respondent or biasing his/her response;
8. Avoiding bias by either comments or vocal inflection;
9. Ability to persuade wavering, disinterested or hostile respondents to continue the interview; and
10. General professional conduct throughout the interview.

Initial telephone contact will be attempted during the hours of the day and days of the week that have the greatest probability of respondent contact. This means that the primary interviewing period will be conducted between 5:30 p.m. and 10:00 p.m. on weekdays; between 9:00 a.m. and 10:00 p.m. on Saturdays; and between 10:00 a.m. and 10:00 p.m. on Sundays. If the interview cannot be conducted at the time of initial contact, the interviewer will reschedule the interview at a time convenient to the respondent. Although interviews will be conducted on evenings and weekends whenever possible, daytime interviews will be scheduled whenever necessary.

#### *Statistical Analysis*

Sample selection for all surveys will follow as closely as possible simple random sampling, with some stratification occurring for the national sample. NHTSA will weight the national and demonstration samples by the likelihood of selection (sex, number of telephone lines and number of eligible adults in the household) and then by age and sex to most recent Census estimates for the specified geographic area. However, NHTSA will not weight the national and demonstration samples for the Alcohol mobilizations because the sample is restricted to drivers age 18 and older who have consumed alcohol within the last year, and there are no census parameters on drivers that drink to which we could weight by age and sex. In cases where over-sampling occurs, the weighting system will compensate for the over-sampling.

Chi square statistics will be applied to final data to compare results from survey waves. . Specifically, statistical tests will be used to determine if there are statistically significant differences between pre and post waves. Additional statistics may be calculated if NHTSA sees a need for more refined analyses and special statistical

software (i.e. SPSS, SAS) will be used if any data are collected using a complex sample design.

### **B.3. Describe methods to maximize response rates.**

One of the steps that NHTSA has considered in order to try to increase response rates for the national mobilization is extending the standard two-week field period. However, a two-week field period is used for these mobilizations because of the constraints involved in coordinating data collection with several States. Specifically, in order to avoid contamination from State highway safety activities, NHTSA confines data collection to a two-week period prior to the mobilization and a two-week period after the mobilization.

The national mobilizations and demonstration projects will include five call attempts and seven callbacks during the field periods. However, the limited field periods will require that the surveys place particular emphasis on contact scripts and the training/monitoring of interviewers. The initial contact script has been carefully developed and refined to be persuasive and appealing to the respondents. The interviewing will be conducted only by thoroughly trained and experienced interviewers who are highly motivated and carefully monitored. All interviewers will have had training on how to overcome initial reluctance, disinterest or hostility during the contact phase of the interview. There will be maintenance and regular review of field outcome data in the sample reporting file, derived from both the sample control and CATI files, so that patterns and problems in both response rate and production rates can be detected and analyzed. Periodic meetings will be held with the interviewing and field supervisory staff and the study management staff to discuss problems with contact and interviewing procedures and to share methods of successful persuasion and conversion. Within the field period of the surveys, five call attempts and seven call backs will be used to maximize response rates.

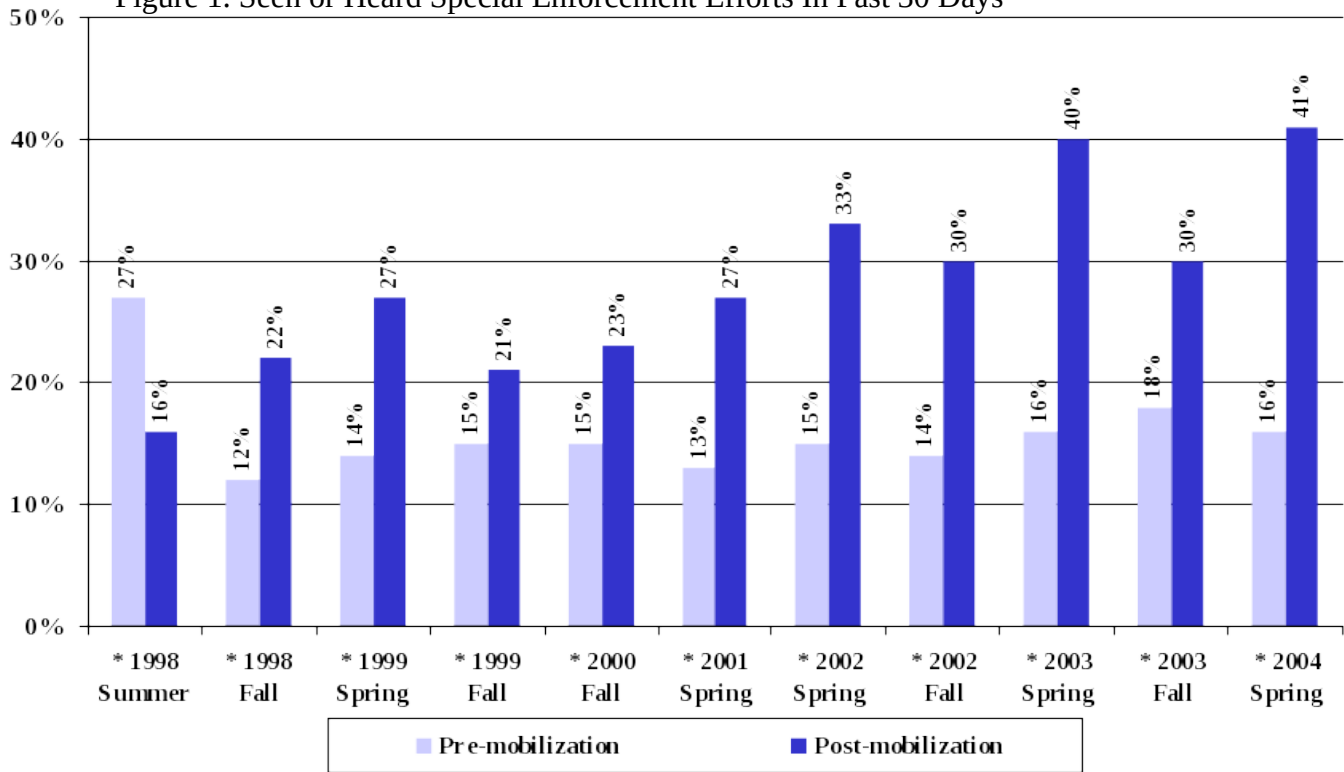
The methods NHTSA uses to increase response rates, which we are now seeking to renew, achieved American Association for Public Opinion Research (AAPOR) response rates ranging from 40% to 45%. This is above the industry standards, which are estimated to be closer to 30%. We will attempt to determine how representative our samples are with respect to the target population by comparing demographic breakout of our samples with demographic profiles from census data. Furthermore, NHTSA has observed strong consistency between the results of its telephone surveys and both known activity in the field as well as concurrent research utilizing self-report or other data collection techniques. The following section is included to provide further evidence of the validity of these surveys.

The “Click It or Ticket” (formerly “Buckle Up America”) surveys have been conducted by NHTSA since 1998. Pre/post survey waves have shown questions in the data collection instrument to be sensitive to the national enforcement mobilizations, as illustrated in Figures 1 and 2. Moreover, the Air Bag and Seat Belt Safety Campaign (AB&SBSC) also conducted telephone surveys during the early years of the safety belt mobilizations. Their results were consistent with the NHTSA results for similar questions (e.g., perceived risk of being ticketed).



The core self-report behavioral and demographic questions on the Click It or Ticket (CIOT) Surveys are also on NHTSA’s Motor Vehicle Occupant Safety Survey (MVOSS), which has used the same basic methodology as the CIOT surveys except for the addition of over-sampling younger persons. The MVOSS formerly was administered approximately the same time of year as NHTSA’s national probability observation survey of safety belt use (the schedule of the observation survey was drastically changed a few years ago). As shown in Table 8, there has been a strong correspondence between the telephone and observational data. The self-report surveys, through the most recent versions, have continually shown the same patterns detected in the national observation surveys (lower belt usage among males, younger persons, pickup truck drivers, etc.).

Figure 1. Seen or Heard Special Enforcement Efforts In Past 30 Days



Q14. In the past 30 days, have you seen or heard of any special effort by police to ticket drivers in your community for seat belt violations?

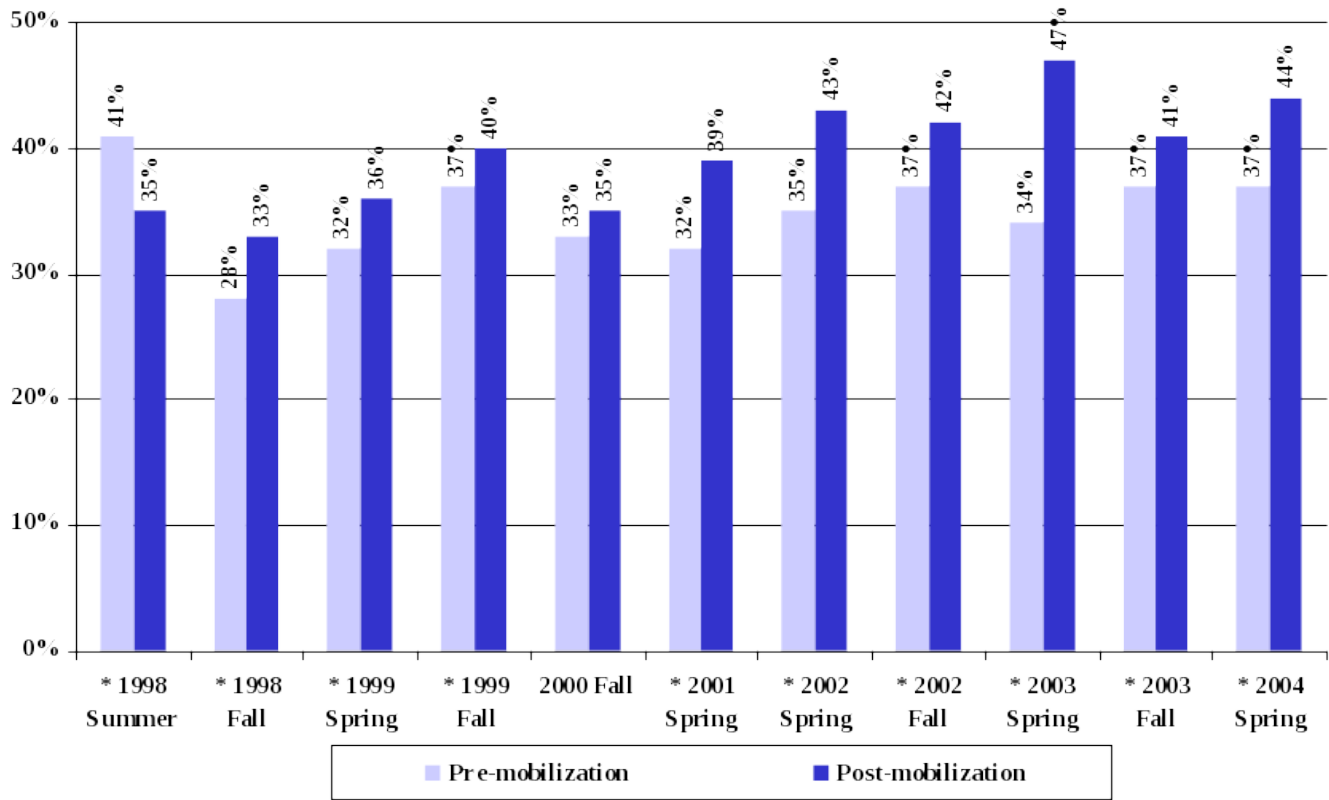
Base: Total adults (Unweighted N’s range from 1,000 to 1,212)

\*Differences between Pre and Post measurement are significant at the .05 level

The sequencing of the Summer 1998 surveys did not follow a pre/post design. Rather, the first survey wave occurred during the period of the intervention, whereas the second survey wave occurred a couple of months after the intervention period.

The larger increases in the more recent years reflect the introduction of paid media.

Figure 2. Police are Writing More Tickets for Seat Belt Violations Now: Strongly/Somewhat Agree



Q13f. Police in my community are writing more seat belt tickets now than they were a few months ago.

Base: Total adults (Unweighted N's range from 1,000 to 1,212)

\*Differences between Pre and Post measurement are significant at the .05 level

The larger increases in the more recent years reflect the introduction of paid media.

<b>TABLE 8</b>			
<b>Revised Reported Seat Belt Use</b>			
<b>Compared To Observed Use By Drivers</b>			
	1998 MVOSS (Telephone Survey) "All Of The Time"	Revised 1998 MVOSS (Telephone Survey) "All Of The Time" (Excludes past day or week non-users)	1998 NOPUS (Observation Survey) Drivers
Total Drivers	79.2%	71.4%	69.6%
Males	74.1%	65.4%	64.3%
Females	84.2%	77.2%	77.7%
Blacks	75.2%	69.5%	67.5%
Whites	78.9%	70.9%	70.3%
Age 16-24	76.0%	63.9%	58.4%
Age 25-69	79.1%	72.2%	70.5%
Age 70+	85.0%	76.7%	76.4%
Passenger Cars	82.3%	74.3%	73.8%
Pickup Trucks	64.7%	57.6%	52.8%
Urban	79.7%	71.8%	74.5%
Suburban	79.7%	72.2%	67.6%
Rural	77.4%	68.9%	67.0%

Source: NHTSA Motor Vehicle Occupant Safety Survey: Volume 2 Seat Belt Report, March, 2000

**B.4. Describe any tests of procedures or methods to be undertaken.**

The proposed mobilization surveys are a continuation of safety belt and impaired driving mobilization surveys conducted in previous years. As such, they will utilize questionnaires nearly identical to those utilized previously, and follow methods that have been previously implemented and found successful.

**B.5. Provide the name and telephone number of individuals consulted on statistical aspects of the design**

The following individuals consulted on statistical aspects of the study design:

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