

SUPPORTING STATEMENT

Introduction

This is a tracking study that NHTSA has conducted periodically since 1991. The last OMB approval was given in 2004 and the OMB approval number for that study was **2127-0634**. One change to the methodology has occurred: Previously the methodology for the survey included a minimum of 100 respondents per State. The new methodology will drop that State requirement and instead collect data to mirror the geographic distribution of those 16 years of age and older.

Part A. Justification

1. Circumstances that make collection of information necessary:

1. *NHTSA mission*

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101). Its Congressional mandate is to reduce the number of deaths, injuries, and economic losses resulting from motor vehicle crashes on our nation's highways. To accomplish this mission, NHTSA sets and enforces safety performance standards for motor vehicle equipment and provides funding to State and local governments for their use in supporting highway safety activities, including demonstration and evaluation programs. NHTSA also conducts research on driver behavior and traffic safety to develop efficient and effective means of bringing about safety improvements.

2. *The severity of the alcohol crash problem*

This collection supports the Department of Transportation's strategic goal in safety by working towards the elimination of transportation-related deaths and injuries. NHTSA Administrator Nicole Nason in a July 2007 press release noted no improvement in last year's alcohol-related fatalities — in 2006, 15,121 fatalities involved a driver or motorcycle operator, pedestrian, or cyclist who had .08 or above blood alcohol level (compared to 15,102 in 2005). In that same press release, U.S. Secretary Mary Peters declared, "Tough safety requirements and new technologies are helping make our vehicles safer and our roads less deadly ... but we all must do more when so many are killed or seriously hurt on our roads every day."

3. *Data needed to address the problem and the reduction goal*

To properly plan and evaluate programs intended to reduce alcohol-impaired driving, NHTSA needs to periodically update its knowledge and understanding of the public's attitudes and behaviors with respect to drinking and driving. This type of information is especially important in view of the lack of change in alcohol-related traffic fatalities from 2005 to 2006 and NHTSA's focus on reducing the magnitude of this problem.

Effective enforcement and education countermeasures are based, in part, on an

understanding of the characteristics and attitudes of drinking drivers, and of those who accompany drinking drivers as passengers. A better understanding of the perceived effectiveness and acceptability of potential deterrents (enforcement actions, physical risk from crashes, social disapproval, etc.) to drinking and driving and to riding with an impaired driver will better equip NHTSA to devise programs to counteract these problem behaviors. Acquiring trended data (this survey has been administered on a periodic basis since 1991) allows NHTSA to measure the effectiveness of current programs and helps identify new areas in need of attention.

4. Legal basis for collecting data

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 recodified 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 (see Attachment E for full text).

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate actual use of information received from the current collection.

The data from this study will be used to address the problem of alcohol-impaired driving and to aid in making recommendations to Congress. NHTSA will use the findings to identify areas of the population on whom to target current programs to achieve the greatest reductions in drinking and driving. NHTSA will examine trends in these data to determine the effectiveness of its programs, and will make adjustments to programs when appropriate.

Much of the study focuses on respondents' perceptions of current and potential programs for reducing alcohol-impaired driving. While enforcement will always be critical to gain compliance with drinking and driving laws for a certain proportion of the population, large and sustainable gains are often the result of voluntary compliance. NHTSA will use this study to gauge the nature and extent of public support of various measures to control drinking and driving. The most recent administration of the survey — in 2004 — found 51% of the driving age population is supportive of a “zero tolerance” policy for drinking and driving, 78% view drinking and driving as a major threat to their personal safety, and 70% believe penalties should be more severe for drivers who violate the drinking and driving laws.

This kind of information allows NHTSA, the States, and other agencies and advocates for highway safety to gain a better understanding of the measures that will be supported by the public, and ultimately those which will be most likely to succeed in reducing alcohol-impaired driving.

Over time, the data from these surveys have shown a small but gradual decline in the number of drinking drivers, i.e., those who drive within two hours after drinking. Continued measurement will allow NHTSA and other interested agencies to further refine their programs to continue the reduction of drinking and driving through public information and education, legislation, law enforcement, and other approaches.

The data collected in this effort is used by NHTSA for planning and policy-related issues as they arise. Because it is a repeat survey, trends are monitored over time, especially in regards to

attitudes, knowledge, perceived risk, and self-reported behavior. The data are also carefully added to NHTSA Fact Sheets and other documents that are provided to the States and others who support anti-DWI programs.

Survey items will obtain data on respondents' behaviors and attitudes on various topics related to drinking and driving including reported frequency of drinking and driving, prevention and intervention, riding with impaired drivers, designated drivers, perceptions of penalties, and knowledge of Blood Alcohol Concentration limits.

In brief, the data from this research study will be used to:

- Define appropriate target groups for countermeasures
- Provide support for related departmental initiatives
- Provide guidance to law enforcement
- Support agency recommendations to the Congress
- Provide guidance to drivers as they make decisions about driving after drinking alcohol
- Assist federal, State, and local highway safety agencies; law enforcement agencies; and citizen activist groups to reach decisions that will most effectively allocate resources
- Contribute to development of effective policies and programs related to alcohol-impaired driving

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

All interviews will be conducted using a state-of-the-art Computer Assisted Telephone Interviewing (CATI) system. This system allows interviewers to enter responses directly into a computer, which instantaneously feeds the information from each station to a mainframe computer. The CATI system is programmed to automatically control branching and skipping within the interview (where a respondent receives certain questions based on responses to earlier questions). Both of these techniques reduce respondent burden from a paper survey because it allows the interviewers to move through the survey questions in the most expedited manner possible.

A Random Digit Dial (RDD) telephone sample will be contacted using an advanced proprietary sample management system that automatically keeps track of the frequency and timing of calls to allow for the most efficient sample management possible. Auto-dialers will be utilized to speed dial telephone numbers. This system does not wait for a "live" voice on the line that can leave a blank time before an interviewer addresses the potential respondent, as can some such systems. Rather, in this system, an interviewer is on the line as soon as a "ring" is detected, thus making dialing of telephone numbers more efficient, and improving the likelihood that the respondent will accept the call.

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

The data to be collected are not collected by any existing system, including those maintained by NHTSA, such as the Fatal Analysis Reporting System (FARS), or the National Automotive Sampling System (NASS).

One national survey of note, The Behavioral Risk Factor Surveillance System (BRFSS), in 2006 contained only one question regarding driving and drinking and an additional five questions on

just drinking. Another notable survey would be the Youth Risk Behavior Survey (YRBS) conducted in 2007. That survey had only two drinking and driving questions and an additional six drinking questions.

Mothers Against Drunk Driving (MADD) (1991, 1993, 2005) has conducted several national studies on drinking and driving. These studies were designed to track the public's attitudes toward drinking and driving and their experience with drunk drivers. The studies did provide some useful information on the drinking and driving problem; however, they did not acquire significant data on personal drinking and driving behaviors, knowledge and understanding of blood alcohol concentration (BAC) levels, personal responsibility, or designated drivers. In short, while the MADD studies offer a quick view of the public's general attitudes, they are not detailed enough to direct program initiatives or to make substantial recommendations to Congress on issues such as BAC levels and zero tolerance. In addition, these studies have not happened on a frequent enough basis to be useful to track program initiatives.

Finally, NHTSA has been conducting pre-/post-national surveys around alcohol crackdown mobilizations, including one currently being conducted under OMB clearance 2127-0646. However, those surveys primarily ask about awareness of the enforcement community's crackdown activity and add some questions about perceived level of enforcement. All of the above surveys are very limited in scope and nature, and are not sufficient for NHTSA's ongoing requirements.

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

No small businesses will be involved in this survey. The collection of information will involve individuals aged 16 and older on a single occasion each.

6. Describe the consequence for federal program or policy activities if the collection is not collected or is collected less frequently.

There are no legal obstacles to reducing the burden. In fact, in reviewing the previous survey administrations, it became clear that a less arduous data collection schedule could provide all the benefits of the survey yet reduce public burden. Therefore, the survey administration schedule was rebalanced downward (from every other year to periodically). However, if this study is not conducted, NHTSA will lack accurate data on trends in the nature and severity of drinking and driving, and the public's views on what should be done to address the problem. As a result, program and policy decisions that must be made will be subject to error. Furthermore, in direct consequence of the lack of information, the Agency's ability to respond to inquiries from Congress about the potential efficacy of alcohol and highway safety countermeasures will be limited.

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.

The question is not applicable as the procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

8. Provide a copy of the FEDERAL REGISTER document soliciting comments on 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.

a. Federal Register Notice

A 60-day Federal Register Notice was published in the *Federal Register* on April 27, 2007, vol. 72, No. 81; pp. 21068-69 (see Attachment A).

b. Responses to the Federal Register Notice

NHTSA received one outside comment to the *Federal Register Notice*. The respondent believed that federal money should not be used for a survey of this nature. NHTSA's response to the comment is that this survey provides a status report to policy makers on current attitudes, knowledge, and self-reported behaviors related to drinking and driving so that they can determine if government crash reduction goals require adjustments to current programs. The complete comment is in Attachment B.

c. Consultation with outside experts

This study was originally designed in 1991, the first year of administration. At that time, consultation about questionnaire content, interview procedures, and the sampling plan occurred during planning meetings with various experts in the area of traffic safety and questionnaire design. More recently, for the 2001 survey, design experts at Gallup, Inc., and alcohol research experts at the National Public Service Research Institute of the Pacific Institute for Research and Evaluation, and the Prevention Research Center in Berkeley, further reviewed the questionnaire. In addition, the Prevention Research Branch of the National Institute on Alcohol Abuse and Alcoholism (NIAAA) and the Center for Disease Control (CDC) reviewed the 2001 questionnaire for content. Only a few minor edits were suggested for the 2004 survey. These included edits based on comments by Gallup and NHTSA staff. In 2007, consultation was undertaken with members of NHTSA's Impaired Driving Division to assess current program information needs in preparation for the 2008 survey. Additional changes to the questionnaire were made as a result of those discussions. Gallup collaborated with NHTSA in making the final revisions to the proposed 2008 survey instrument, which is contained in Appendix C.

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

An incentive of \$10 for selected respondents will be included in the component of the survey involving the interviewing of cell phone only individuals. We will incorporate an experiment into the survey design to assess whether a small incentive appreciably helps increase the response rate. Persons identified as cell phone only will be randomly assigned to one of two groups. One group will be offered a \$10 incentive to participate in the full survey; the other group will not be offered the incentive.

10. Describe any assurance of confidentiality provided to respondents.

Gallup will collect all of the data. Respondents will be told at the onset of the interview that "This survey is completely anonymous. Responses will never be linked to individual respondents." This notice will be repeated to the respondent prior to asking respondents for any demographic information. All interviewers will sign statements of confidentiality in which they promise not to

reveal the results of any interview.

An additional safeguard is the fact that the name of the respondent is not collected during the course of the interview, and the telephone number is separated from the survey data before analysis. All questionnaires, other records, and database entries will be identified by case identification numbers only. These procedures ensure that data on individual respondents cannot be traced to the sources.

It is noteworthy that in nearly 70 years of existence, Gallup has never been involved in an instance of breach of trust or anonymity of respondent data.

11. Provide additional justification for any questions of a sensitive nature.

Because the questionnaire asks respondents about their drinking and driving habits, the entire questionnaire could be construed as sensitive in nature. Therefore, the justification for all questionnaire items is listed in Attachment D. It should be noted that respondents are made aware that participation is completely voluntary, and that they may refuse to answer any questions with which they feel uncomfortable. Even though respondents have had an opportunity to refuse to answer questions, past administrations indicate fewer than about 8% of all respondents refuse to answer even the most sensitive questions. The highest item refusal rate has been for income, at about 12%.

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

NHTSA estimates that the pretest interviews will require an average of 20 minutes apiece, or a total of 6 hours for the 18 respondents to complete the interviews. Each respondent in the final survey sample will require an average of 20 minutes to complete the telephone interview or a total of 2,000 hours for the 6,000 respondents. Total respondent burden is therefore 2,006 hours.

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. U.S. Census Bureau data show mean income in 2003 for males was \$41,483 and for females was \$24,630 (from Current Population Survey). This translates into approximately 33.2 cents a minute for males and 19.7 cents a minute for females (assuming 52 40-hour workweeks). Below are cost calculations for the pretest and survey using the average interview lengths of 20 minutes.

<i>Pretest</i>	Sample Size	Cost/Minute	Average Length	Cost/Interview	Total
Males	9	\$0.332	20 minutes	\$6.64	\$59.76
Females	9	\$0.197	20 minutes	\$3.94	\$35.46
<i>Actual Survey</i>	Sample Size	Cost/Minute	Average Length	Cost/Interview	Total

Males	3000	\$0.332	20 minutes	\$6.64	\$19,920.00
Females	3000	\$0.197	20 minutes	\$3.94	\$11,820.00
					<u>0</u>
					\$31,835.22

The figures above indicate an annualized cost of less than \$10 per person. It bears repeating that these cost figures are purely hypothetical. There is no actual cost to respondents since they will be interviewed during non-salaried hours. Participation will be voluntary.

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

There are no costs to respondents or record keepers.

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

The annualized cost to the government for this project is \$236,811. This estimate includes all associated costs (e.g. costs for personnel, data collection, data storage, analysis, final report preparation, etc).

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

This is a new information collection. As such, it requires a program change to add the estimated 2,006 hours for the new information collection to existing burden.

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

This study will be published as a NHTSA Technical Report. It is anticipated that multiple highly significant findings will emerge from the study, and that they will be of interest not only to traffic safety agencies, law enforcement, and legislators, but also to the general driving public. For that reason, the findings will be widely disseminated in both scientific and lay formats. NHTSA plans to do a press release of the data to highlight the main findings, and to ensure availability for continued analysis and study. The data (absent all identifying information) will be placed in the public domain.

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.

No such approval is being sought. The OMB survey number and expiration date are displayed on the interviewers' computer screens. They serve as a reference if needed.

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

No exceptions to the certification statement are made.

