

**INFORMATION COLLECTION
SUPPORTING JUSTIFICATION**

**FACTORS FOR SELECTION OF RAILROADS FOR EVALUATION
OF BRIDGE MANAGEMENT PRACTICES
FRA Form Numbers F 6180.129**

- 1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.**

The Federal Railroad Administration (FRA) has statutory responsibility to ensure the safety of railroad operations. See the Federal Rail Safety Act of 1970 (45 U.S.C. §§ 421 et seq.; now 49 U.S.C. 20103 et seq.). FRA has conducted a Railroad Bridge Safety Program at various levels of effort ever since the enactment of the Railroad Safety Act of 1970. FRA is authorized under that act to issue regulations addressing a wide variety of subjects regarding railroad safety, but FRA has found that bridge safety has been well served by a non-regulatory policy.

The resulting Statement of Agency Policy on the Safety of Railroad Bridges, published in the Federal Register in 2000, is based on the findings of a survey conducted by FRA in 1992 and 1993. That survey showed that a large majority of railroads were managing their bridges in a manner which promoted the immediate safety of those bridges. FRA, therefore, adopted that Bridge Safety Policy, which incorporates non-regulatory guidelines. The non-regulatory guidelines of the Bridge Safety Policy are promulgated as Appendix C of the Federal Track Safety Standards, Title 49 Code of Federal Regulations, Part 213.

Since the initial bridge management survey was completed, FRA has continued to conduct evaluations of the bridge management practices of the Nation's railroads. Regular, continuing contact has been in place between FRA and the larger railroads (Class I and major passenger carriers). However, the selection of smaller railroads (Class III short lines and smaller Class II regional railroads) has been on an ad hoc basis. FRA has based decisions to evaluate individual smaller railroads on recommendations from FRA regional staff, complaints from the public, and the small number of bridge-related train accidents.

The Government Accountability Office (GAO) in 2006 and 2007 conducted a study to evaluate the safety and serviceability of our Nation's railroad bridges and tunnels. GAO reported to Congress on that study in August 2007. That report, "RAILROAD BRIDGES AND TUNNELS - Federal Role in Providing Safety Oversight and Freight Infrastructure Investment Could Be Better Targeted", includes the following recommendation:

“To enhance the effectiveness of its bridge and tunnel safety oversight function, we recommend that the Secretary of Transportation direct the Administrator of the Federal Railroad Administration to devise a systematic, consistent, risk-based methodology for selecting railroads for its bridge safety surveys to ensure that it includes railroads that are at higher risk of not following the FRA’s bridge safety guidelines and of having bridge and tunnel safety issues.” FRA agrees with that recommendation, and is implementing it.

A vital part of that methodology is the development of information on which to base the factors by which railroads will be selected for surveys and evaluations. The factors developed by FRA, in conjunction with the railroads themselves, include such statistics as the length of a railroad in miles, the number, types and total length of its bridges, its level of traffic, the presence of hazardous material traffic, the operation of passenger trains, and the railroad’s record of train accidents. Several of those factors, particularly regarding the railroad’s bridge population, are not found in data already held or collected by FRA.

An attempt to characterize the selection factors without incorporating that data on a railroad’s bridge population would seriously compromise the accuracy and usefulness of the information. FRA has, therefore, determined that the effectiveness of its bridge safety program depends on this data. FRA has identified two options for collecting the required data. In the first case, FRA inspectors could visit each railroad in turn, interview the managers of the railroad, and record the information presented. In the second case, FRA could request that each railroad provide its data to FRA in a convenient format.

FRA believes that the second option, self-reporting by the railroads, is more convenient for the responding universe, and that it represents the most efficient use of agency resources. Railroad managers will be able to gather the data on their own time schedules, within reason, and FRA would not have to devote employee time and travel expenses to visit the responding railroads.

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.

This is a new collection of information. FRA will use the data received in this project to rank individual railroads for scheduling bridge program evaluations by FRA’s Bridge Safety Staff. The data will be analyzed against weighting factors, and railroads will be prioritized according to the resulting scores. The weighting factors are presently being reviewed by a committee of the American Short Line and Regional Railroad Association (ASLRRA). FRA will consider the recommendation of ASLRRA in this regard, and will make the weighting factors available to the respondent universe and the public as part of this project.

It should be noted that a high selection ranking of any railroad by FRA will not necessarily indicate that the railroad has a bridge safety problem. That determination,

one way or the other, will only be made by FRA during its evaluation of that railroad's bridge management practices.

If they are not already doing so or have not done so in a while, the collection of information will be used by railroads to carefully examine their inventory of bridges as well as their inspection and ratings programs for these bridges. In particular, the collection of information will provide the impetus for railroads to determine whether or not they currently have an accurate inventory of their bridges or if they need to create or update such an inventory to perform proper oversight and maintenance of their bridges. Additionally, the collection of information will facilitate railroads' review of their bridge inspection programs, notably the basis and frequency of their bridge inspections, and may serve as a catalyst for them to reassess/reassign personnel used for supervision of bridge inspections as well as to more carefully scrutinize their bridge capacity ratings system. Finally, the collection of information will serve to highlight the importance to railroads of conducting safe rail operations over bridges they control and ensure that traffic density, train speed, maximum loads, movement of hazardous materials, and passenger train traffic are suitable for these bridges.

3. **DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G. PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN.**

FRA strongly endorses and highly encourages the use of advanced information technology and electronic record keeping, wherever possible, to reduce burden. In keeping with the requirements of the Paperwork Reduction Act (PRA) and the Government Paperwork Elimination Act (GPEA), once approved by OMB, FRA plans to provide Form FRA F 6180.129 as both an Adobe PDF fill-form and as an Excel spreadsheet, either of which can be readily filled out and electronically transmitted to the agency. FRA will also place the form on the agency Website for the convenience of respondents.

It should be noted that the total estimated burden for the proposed collection of information is very 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.**

There are no existing sources of information that contain railroad-specific bridge population data, bridge management practices, or railroad operating practices relating to maximum loads, train speed, traffic density, passenger operations or control of

exceptional loads. The railroad's record of train accidents can be extracted from the existing train accident database should the respondent railroad choose not to provide said information.

Similar data is not available from any other source.

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 U.S. Small Business Administration (SBA) stipulates in its "Size Standards" that the largest a railroad business firm that is "for profit" may be, and still be classified as a "small entity" is 1,500 employees for "Line-Haul Operating Railroads," and 500 employees for "Switching and Terminal Establishments." "Small entity" is defined in the Act as a small business that is independently owned and operated, and is not dominant in its field of operation. SBA's "size standard" may be altered by federal agencies after consultation with SBA and in conjunction with public comment. Pursuant to that authority, FRA has published a final policy that formally establishes "small entities" as railroads which meet the line haulage revenue requirements of a Class III railroad. The revenue requirements are currently \$40 million or less in annual operating revenue. The \$40 million limit (which is adjusted by applying the railroad revenue deflator adjustment) is based on the Surface Transportation Board's (STB) threshold for a Class III carrier. FRA uses the same revenue dollar limit to determine whether a railroad is a small entity.

There are approximately 718 railroads currently operating in the United States. According to Association of American Railroads (AAR) data, as of 2007, there were eight (8) Class I railroads (including Amtrak) and 33 Class II railroads; therefore, as many as 677 railroads would be characterized as small entities. While all small railroads will be asked to respond, it should be noted that, in some cases, the railroad's response will be reduced to advising that they own no bridges. For the remainder of the small railroads, the burden should be directly proportional to the size of the operation. The level of detail being requested, especially as pertaining to railroad bridge population, has been reduced to the minimum necessary to support the intended use. This reduction took place after discussions with various size railroads during the course of ASLRRRA Bridge Committee deliberations.

Again, it should be noted that the total estimated burden for the proposed collection of information is very 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 the proposed information collection activities are not conducted, rail safety throughout

the United States might be considerably adversely impacted. Specifically, without the proposed collection of information, FRA would have no means or method to evaluate the bridge management practices of the nation's railroads to gauge whether they are following effective and safe practices and procedures in maintaining the bridges under their control and conducting safe rail operations over these bridges. Without the proposed collection of information, FRA would be denied an extremely valuable resource to most efficaciously direct its very limited bridge inspection personnel to carry out their critical duties. It is vitally important to ensure safe train operations and to prevent a catastrophic failure or other bridge failures that could result in scores of injuries and fatalities.

Additionally, without the proposed collection of information, FRA would be unable to implement the GAO recommendation to "devise a systematic, consistent, risk-based methodology for selecting railroads for its bridge safety surveys" and would be forced to have FRA inspectors visit each railroad in turn, interview the managers of the railroad, and record the information presented. FRA has neither the manpower nor the luxury of many years over which to complete this extremely important task. Continuing to select railroads for evaluation of their bridge management practices on an ad hoc basis would result in reactive rather than proactive enforcement activities. Further, without this collection of information, FRA would have no reasonable means to ensure that those railroads presenting the highest risk of experiencing a bridge related accident or catastrophic bridge failure are evaluated first.

In sum, the proposed collection of information contributes to FRA's paramount mission, which is to promote and enhance rail safety throughout the United States and to reduce, to the greatest extent possible, the number of rail accidents/incidents that occur each year and the corresponding number of injuries, fatalities, and property damage that result from such events. The proposed collection of information will provide necessary data that will enable FRA to closely look at railroads' bridge management practices and, where needed, recommend/compel changes to ensure that bridges are properly inspected, repaired, and maintained so that vital rail transportation arteries, which bridges are such an integral part of, function smoothly and efficiently.

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.**

No known special circumstances exist relating to this section.

All information collection requirements are in compliance with this section.

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

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

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM

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

As required by the Paperwork Reduction Act of 1995, FRA published a notice in the **Federal Register** on October 2, 2008, soliciting comment on the proposed information collection activities. *See* 73 FR 57404. In response to this Notice, FRA received no comments. However, FRA did receive one letter in response to a previous **Federal Register** Notice published on June 18, 2008. *See* 73 FR 34829.

This letter came from Mr. Freddie Simpson, President of the Brotherhood of Maintenance of Way Employees Division (BMWED). The BMWED is a labor organization representing approximately 35,000 railroad workers who build, maintain, inspect, and repair railroad tracks, bridges, and related railroad infrastructure throughout the United States. In his comments, Mr. Simpson noted the following:

BMWED is a charter member of the Rail Safety Advisory Committee (RSAC) and a voting member of the RSAC Railroad Bridge Working Group (RBWG). The RBWG is tasked by FRA to “report to the Federal Railroad Administration on the current state of Railroad bridge safety management, updating the findings and conclusion of the 1993 Summary Report of the FRA Railroad Bridge Safety Survey, including recommendations for further action.”

BMWED believes the information collection activities outlined in *OMB Control Number: 2130-New* are necessary for FRA and RBWG to properly execute its functions. BMWED also believes the information collection activities will have practical utility in assessing the current state of railroad bridge safety management and that the anticipated surveys and evaluations of selected railroad bridge management programs is vital to such assessment. Finally, BMWED believes that FRA’s estimates of the burden of such information collection activities are reasonable, sound, and minimally burdensome.

The information to be collected and the weighting factors to be applied thereupon are presently being reviewed by the ASLRRRA Bridge Committee. This committee is composed of the chief bridge engineers from the seven Class I railroads as well as Amtrak, representatives of Class II regional and Class III short line railroads, consulting engineers, and industry suppliers. FRA will consider the recommendations of the ASLRRRA Bridge Committee in this regard.

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

No payments or gifts will be provided to respondents.

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 will be made by the FRA.

The information to be collected is not of a private or sensitive 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.**

No information of a sensitive nature will be requested or collected.

- 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 WHY 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 of railroads (Class I, II, & III freight, passenger, historical and tourist) is estimated to be 718. Of this total population, it is not expected that all railroads will respond to the FRA request for information. Assuming a 70% response rate, approximately 500 responses are expected.

Form	Number of Respondents	Total annual responses	Time per Response	Total Burden in Hours
FRA F 6180.129 Factors for Selection of Railroads for Evaluation of Bridge Management Practices	718	500	3 hours	1,500

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.**

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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.**

An agency Bridge Safety Specialist (GS-13, Step 5)* will spend approximately 15 minutes per response reviewing the data and inputting the information into a spreadsheet. With 500 expected responses, a total of 100 hours will be incurred on this project. Thus, the Federal Government will incur an estimated cost of \$7,885.

* (Comes to an hourly rate of \$63.07 based on 2008 OPM Salary table for the Locality Pay Area of Washington – Baltimore – Northern Virginia; 40 percent overhead costs are included).

- 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 collection of information. Hence, there are no program changes or adjustments at this time.

- 16. FOR COLLECTIONS OF INFORMATION WHOSE RESULTS WILL BE PUBLISHED, OUTLINE PLANS FOR TABULATION, AND PUBLICATION. ADDRESS ANY COMPLEX ANALYTICAL TECHNIQUES THAT WILL BE USED. PROVIDE THE TIME SCHEDULE FOR THE ENTIRE PROJECT,**

INCLUDING BEGINNING AND ENDING DATES OF THE COLLECTION OF INFORMATION, COMPLETION OF REPORT, PUBLICATION DATES, AND OTHER ACTIONS.

There are no plans to publish the data collected in this project. The information will be used by the FRA internally to prioritize bridge safety staff assignments relating to conducting bridge program evaluations. Railroads will be selected using a risk-based methodology driven by the data supplied by the individual respondent railroads.

The planned project schedule, shown below, assumes that FRA will receive OMB approval for the information collection by the end of February 2009.

Activity	Date
Preparation / Distribution	March – April 2009
Information Collection	May – July 2009
Data Input & Analysis	August – September 2009

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**. In keeping with the requirements of the Paperwork Reduction Act and 5 CFR 1320 and upon OMB approval, FRA plans to display the OMB control number and expiration date on Form FRA F 6180.129.

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

No exceptions are taken at this time.

Meeting Department of Transportation (DOT) Strategic Goals

This information collection supports the top DOT strategic goal, namely transportation safety. FRA will use the information collected to allocate agency resources to improving the safety of railroad bridges and related infrastructure in an effort to prevent accidents, incidents, injuries, and fatalities caused by catastrophic failure or other bridge failures. Use of the information collected will allow FRA to implement the GAO's recommendation to "devise a systematic, consistent, risk-based methodology for selecting railroads for its bridge safety surveys to ensure that it includes railroads that are at higher risk of not following the FRA's bridge safety guidelines and of having bridge and tunnel safety issues." Without this collection of information, FRA will have no reasonable means to ensure that those railroads presenting the highest risk of experiencing a bridge related accident or catastrophic bridge failure are evaluated first.

The proposed collection of information contributes to FRA's paramount mission, which is to promote and enhance safe rail operations throughout the United States and to reduce, to the greatest extent possible, the number of rail accidents/incidents that occur each year and the corresponding number of injuries, fatalities, and property damage that result from such events. The proposed collection of information will provide necessary data that will enable FRA to closely look at railroads bridge management practices and, where needed, recommend/compel changes to ensure that bridges are properly inspected, repaired, and maintained so that vital rail transportation arteries, which bridges are such an integral part of, function smoothly and efficiently.

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