

**Supporting Statement
For
Renewal of OMB Control Number 2127-0621
49 CFR Part 571.403 Platform lift systems for motor vehicles
49 CFR Part 571.404 Platform lift installations in motor vehicles**

**1. Explain the circumstances that make the collection of information necessary.
Attach a copy of the appropriate statute or regulation mandating or authorizing the
collection of information.**

The National Highway Traffic Safety Administration (NHTSA), under the U.S. Department of Transportation, was established by the Highway Safety Act of 1970 to carry out safety programs under the National Traffic and Motor Vehicle Safety Act of 1966. The Safety Act has subsequently been recodified under Title 49 of the United States Code in Chapter 301, Motor Vehicle Safety. Under Purpose and policy (49 U.S.C. Section 30101) it is stated that the purpose of this chapter [49 USCS §§ 30101] is to reduce traffic accidents and deaths and injuries resulting from traffic accidents. Therefore, it is necessary (1) to prescribe motor vehicle safety standards for motor vehicles and motor vehicle equipment in interstate commerce. Under Providing information to, and maintaining records on, purchasers (49 U.S.C. Section 30117) (a) The Secretary of Transportation may require that each manufacturer of a motor vehicle or motor vehicle equipment provide technical information related to performance and safety required to carry out this chapter [49 USCS §§ 30101 *et seq.*]. The Secretary may require the manufacturer to give the following notice of that information when the Secretary decides it is necessary: (1) to each prospective purchaser of a vehicle or equipment before the first sale other than for resale at each location at which the vehicle or equipment is offered for sale by a person having a legal relationship with the manufacturer, in a way the Secretary decides is appropriate. (2) to the first purchaser of a vehicle or equipment other than for resale when the vehicle or equipment is bought, the printed matter placed in the vehicle or attached to or accompanying the equipment.

In December 2002, NHTSA established two new safety standards: an equipment standard specifying requirements for platform lifts; and a vehicle standard for all vehicles

equipped with such lifts. The new equipment standard requires platform lift manufacturers to ensure that their lifts meet minimum platform dimensions and maximum size limits on platform protrusions and gaps between the platform and either the vehicle floor or the ground. The standard also requires handrails, a threshold warning signal, and retaining barriers for lifts. Performance tests are specified for wheelchair retention on the platform, lift strength, and platform slip resistance. A set of interlocks is prescribed to prevent accidental movement of a lift and the vehicle on which the lift is installed. The vehicle standard requires vehicle manufacturers who install lifts to use lifts meeting the equipment standard, to install them in accordance with the lift manufacturer's instructions, and to ensure that specific information is made available to lift users. The purpose of the two standards is to prevent injuries and fatalities during lift operation and to promote the uniformity of Federal standards and guidelines for platform lifts.

This action addresses the Department's Strategic Goal #6, "Safety Strategic Goal," specifically strategy 6.2.3, "Standards regulations and enforcement" by making vehicles and vehicle equipment safer for persons with disabilities.

This submittal is a renewal of a previously approved OMB approved information collection.

2. Indicate how, by whom, and for what purpose the information is to be used.

Indicate actual use of the information received from the current collection.

49 CFR Part 571.403 Platform lift systems for motor vehicles requires that lift manufacturers provide operating instructions by the controls on their lifts. The operating instruction information or label must include normal operating instructions, emergency backup operating instructions and the statement "DOT - Public Use Lift" or "DOT - Private Use Lift". In addition, if the lift is a private use lift, the operating instruction information or label must include the load rating of the lift and any special boarding instructions such as wheelchair occupants must back onto the lift when loading from the ground level. The burden of this information is on the lift manufacturer, and the end-user

of the equipment is a direct beneficiary of the information. This information contributes greatly to the safe operation of the equipment during normal conditions and aids in providing safe egress of disabled persons from vehicles in cases of lift failure. The lift manufacturer is also responsible for providing the same information stated above in an insert, which will be placed in the vehicle owner's manual. In addition to this information, the vehicle owner's manual insert must contain a maintenance schedule and the definition of "DOT-Public Use Lift" or "DOT-Private Use Lift" whichever applies. The only exception is that the vehicle owner's manual insert for private use lifts must include the dimensions of the unobstructed operating volume. The lift manufacturer must also provide an insert to the installation instructions that goes to the vehicle manufacturer which includes a list of vehicles on which the lift is intended to be installed, operational checks that must be completed by the vehicle manufacturer to insure the lift is installed properly and is fully operational, and the statement "DOT - Public Use Lift" or "DOT - Private Use Lift." The burden of this information is also on the lift manufacturer and the beneficiaries of the information are both the vehicle manufacturer and the end-user. The information assures the vehicle manufacturer and the end-user that the lift selected is correct for the specific application and is installed and working properly. There is no burden in determining any of this information as all of this information is known or acquired routinely during the design, manufacturing, and testing processes. This information would be known even in the absence of this collection requirement. In many cases, this information is already collected and disseminated. 49 CFR Part 571.404 Platform lift installations in motor vehicles only requires that vehicle manufacturers pass information on to the end-user by placing the vehicle owner's manual insert provided by the lift manufacturer in the vehicle owner's manual.

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

This question is not applicable to this submission. The regulation simply requires an operating instruction label on platform lifts, and printed informational inserts to be placed in both owner's manuals and installation instructions. No reports to NHTSA are required.

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

The information collection requirement under this regulation is unique and is not available through other required sources.

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

The required information is presently known or collected by all manufacturers, as it is routinely acquired during the design, manufacturing and testing processes. In most cases, the required information is already disseminated in some form or another. It is anticipated that there are few, if any, small business, lift manufacturers in operation at the present time. Any small business lift manufacturers that are presently in business would incur minimal burden for the reasons stated above.

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

The required information will be unique to a particular model lift or possibly to a particular model lift/vehicle combination. Once the information (which is already known) is formatted, it is simply repeated for each lift. The results of the absence of this required information may include premature lift failures, vehicle damage, and user/bystander injuries and fatalities.

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

The procedure 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 action in response to the comments.

Describe efforts to consult with persons outside the agency to obtain their views.

The information collection details were published in Federal Register notice (73 FR 65920), which was the sixty-day notice for solicitation of comments on the subject collection of information. No comments were received by the docket.

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

No payment or gift will be or was provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

No assurances of confidentiality are given by the agency. There is no requirement that information be sent to the agency. All required information is intended for public dissemination or for use by vehicle manufacturers. Information intended for use by vehicle manufacturers is not of a confidential or sensitive nature.

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

There are no private questions or matters involved in this information-collection activity. The required information is exclusively business-oriented, with no personal data submitted or requested.

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

Our estimated hour burden to lift and vehicle manufacturers are as follows:

- Estimated hour burden to lift manufacturers to produce an insert for the vehicle owner's manual stating the lift's platform operating volume, maintenance schedule, and instructions regarding the lift operating procedures:
10 manufacturers x 24 hrs amortized over 5 yrs = 48 hrs per year

- Estimated hour burden to lift manufacturers to produce an insert for the lift installation instructions identifying the vehicles on which the lift is designed to be installed:

10 manufacturers x 24 hrs amortized over 5 yrs = 48 hrs per year

- Estimated hour burden to lift manufacturers to produce two labels for operating and backup lift operation:

10 manufacturers x 24 hrs amortized over 5 yrs = 48 hrs per year

Total estimated hour burden = 144 hrs per year

The estimated costs associated with the total estimated burden hours are as follows:

- Clerical staff - 24 hours per year at \$10.00 per hour equals \$240.00 per year
- Label/informational insert designer - 30 hours per year at \$25.00 per hour equals \$750.00 per year
- Printer - 70 hours per year at \$20.00 per hour equals \$1400.00 per year
- Label/informational insert applicator - 20 hours per year at \$15.00 per hour equals \$300.00 per year.

Total estimated annual cost to respondents for the hour burdens for collection of information (labor costs) = \$2690.00

Note: This cost associated with hour burden as determined above is not included in the "Annual reporting and record keeping cost burden" figure in Question 14 of form OMB 83-I

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

Material cost to lift manufacturers to produce:

- Label for operating instructions - 27,398 lifts x \$0.13 per label = \$3,561.74
- Label for backup operations - 27,398 lifts x \$0.13 per label = \$3,561.74
- Owner's manual insert - 27,398 lifts x \$0.04 per page x 1 page = \$1,095.92
- Installation instruction insert - 27,398 lifts x \$0.04 per page x 1 page = \$1,095.92

Total annual material cost = \$9,315.32

The estimated material cost burden per lift/vehicle manufacturer is as follows:

Total annual burden: \$9315.32

Respondents: 10.0

Cost per respondent: \$931.53

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

There is no cost incurred by the Federal Government as a result of this regulation.

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

There are no changes or adjustments to be reported in this submission.

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

This collection of information will not be published.

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

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

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

No exceptions to the certification statement are made.