

**Support Statement
for
49 CFR Part 575, Consumer Information Regulations (Sections 103 and 105)
OMB Control Number: 2127-0049**

The supporting statement addresses only the annual reporting hours and cost burdens associated with Section 103-Truck-camper loading and Section 105-Utility vehicles.

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

49 USC § 30117 (a) specifies that 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 (See Attachment 1). This section further authorizes the Secretary to require manufacturers to notify first purchasers and prospective purchasers of these data.

To carry out this statutory directive, the agency promulgated 49 CFR Part 575, Consumer Information Regulations. The regulation requires manufacturers to provide performance and safety information to their dealers who will distribute this information to potential first purchasers of new vehicles. These manufacturers also furnish the agency with copies. Every manufacturer of motor vehicles and motor vehicle equipment must provide NHTSA with performance and safety information and technical data to comply with the following:

- Truck-camper loading (information about trucks that can accommodate slide-in campers) (Section 575.103).
- Utility vehicles (information about handling and maneuvering characteristics of utility vehicles) (Section 575.105).

This collection supports the DOT Performance Goal of safety.

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

Vehicle manufacturers provide truck-camper loading and utility vehicles information to three recipients: first purchasers of new vehicles, dealers selling the manufacturers vehicles and NHTSA.

- A. First Purchasers of New Vehicles. Section 575.6(a) requires vehicle manufacturers to furnish the relevant consumer information to every first purchaser of a new vehicle. The information is either included in the owner's manual or printed on a separate document included with the owner's manual.

The information gives the first purchaser a permanent record of the vehicle's performance capabilities in different areas, therefore, a purchaser will know the safety performance and maneuvering limits of the vehicle. This information supplements the vehicle manufacturers' design efforts.

- B. Dealers Selling the Manufacturer's Vehicles. Section 575.6 (c) requires vehicle manufacturers to freely provide sufficient quantities of this consumer information to dealers selling their vehicles. Dealers distribute the information to any prospective purchaser. This information allows any prospective purchaser to compare vehicles' safety performances and uses.
- C. NHTSA. Section 575.6(d) requires vehicle manufacturers to first furnish copies of its consumer information to the agency then to the public.
- 3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.

NHTSA does not currently receive any of the information using technological collection techniques. However, Part 575 does not impose any obstacles to using improved information technology to disseminate this information.

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

NHTSA is the only agency that requires manufacturers to provide this consumer information to first purchasers of automobiles. This information becomes a permanent record of important safety performance and help consumers to make purchasing decisions.

Truck-camper loading information. Neither NHTSA nor consumers would have access to any information similar to the truck-camper loading information without this regulation.

Utility vehicles information. Consumers are unaware of utility vehicles' handling and maneuvering limitations without this requirement.

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

These consumer information requirements apply only to vehicle manufacturers, and NHTSA believes that few, if any, qualify as small entities. Each manufacturer provides the information once and updates it as necessary.

6. Describe the consequences to the Federal program or policy activities if the information collection were conducted less frequently.

If this consumer information was not available to vehicle purchasers, consumers would not know the safety performance and maneuvering limits of utility vehicles nor the slide-in camper capability of some light trucks.

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

The procedures specifying this consumer information are fully consistent with the guidelines set forth in 5 CFR 1320.6.

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 action in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

See the attached Federal Register document (74 FR 3134; January 16, 2009) that solicited comments on extending the collection of information. NHTSA received no comments.

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

No payment or gift is provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

The agency provides no assurances of confidentiality to respondents for this requirement because it is public information.

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

The requested information is not of a private nature.

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

The agency estimates 15 responses annually. Currently, 12 light truck manufacturers comply with 49 CFR Part 575. These manufacturers file one response annually and submit an additional response when they introduce a new model. They rarely file changes with the agency, but we estimate three manufacturers will alter their information because of model changes.

The light truck manufacturers gather only pre-existing data for the purposes of this regulation. The agency estimates light truck manufacturers use about 9.00 hours to gather and to arrange data in proper format.

Light truck manufacturers' significant burden is printing and distributing copies of this consumer information to their dealers and attaching the labels to light trucks that are capable of accommodating slide-in campers. The agency estimates about 800,000 copies of this information will be printed. Although most high-speed printing methods are fast, we assume a total burden of 60 hours (4.0 hours per manufacturer) to print this information.

The final step is to estimate the burden to print the truck-camper labels and utility vehicle information in the owner's manual or on a separate document included with the owner's manual. Since this information is listed in the owner's manual, NHTSA estimates 105 hours (seven hours per manufacturer) are spent printing the consumer information in the owner's manual. OMB approved the owner's manual information collection under a separate request (approval OMB Control Number 2127-0541).

The estimated annual burden hours are 300. This number is derived from multiplying total responses (15) by total hours (20).

Gathering data -	9.00
Distributing data -	4.00
Printing -	<u>7.00</u>
Total hours	20.00

Assuming an average of \$35.00 per hour for professional/clerical personnel to gather data, distribute and print material, NHTSA estimates the cost is \$10,500 (\$35.00 per hour X 300 burden hours).

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

The annual cost is based on light truck production. In model year 2008, light truck manufacturers produced about 6,464,659 units. By assuming that all light truck manufacturers (both large and small volume manufacturers) incur the same cost, the total annual cost to comply with statutory requirements, \$575.103 and \$575.105= \$2,262,631 (or \$0.35 each unit).

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

NHTSA records and maintains information on 49 CFR Part 575. The estimated annual cost of reviewing and storing the information submission is 200 hours at \$10 per hour, for a cost of \$2,000.

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

The annual reporting and recordkeeping cost burden decreased because manufacturers produced less light trucks in MY 2008 than in MY 2005. The total cost decreased from \$2,883,685 to \$2,262,631. This represents an adjustment of \$621,054.

16. For collection of information whose results are planned to be published for statistical use.

This collection of information will not have the results published for statistical use.

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 to the certification statement identified in Item 19. "Certification for Paperwork Reduction Act Submission," of OMB Form 8301.

Exceptions to the certification statement are not required.

- B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.

Attachments