

**INFORMATION COLLECTION
SUPPORTING STATEMENT
WORK SCHEDULES AND SLEEP PATTERNS OF
TRAIN CREWS IN PASSENGER SERVICE
FRA Form Numbers F 6180.130; F 6180.131**

Part A - Justification

- 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 Railroad Safety Improvement Act of 2008 (RSIA), Public Law 110-432, grants the Federal Railroad Administration (FRA) the authority to prescribe regulations “. . . governing the Hours of Service of Train Employees of Commuter and Intercity Passenger Railroad Carriers.” (§ 21109).” This section of the law provides that:

Such regulations and orders may address railroad operating and scheduling practices, including unscheduled duty calls, communications during time off duty, and time spent waiting for deadhead transportation or in deadhead transportation from a duty assignment to the place of final release, that could affect employee fatigue and railroad safety.

Furthermore, the regulations shall consider

. . . scientific and medical research related to fatigue and fatigue abatement, railroad scheduling and operating practices that improve safety or reduce employee fatigue, a railroad’s use of new or novel technology intended to reduce or eliminate human error, the variations in freight and passenger railroad scheduling practices and operating conditions, the variations in duties and operating conditions for employees subject to this chapter, a railroad’s required or voluntary use of fatigue management plans covering employees subject to this chapter, and any other relevant factors.

The proposed study of train crews in passenger service is similar in scope and methodology to that of the recently completed study of all train and engine service (T&E) employees. The prior study, conducted in 2008, used a random sample of actively working T&E employees in the United States. There was an inadequate number of T&E workers in passenger operations in that random sample to make meaningful conclusions about this subgroup of T&E workers. As a result, the proposed study is necessary.

Obtaining insight into the schedule-related fatigue issues of any population of workers requires data on both their work and their sleep patterns. As was the case for the larger group of T&E employees, there is no readily available data for both work schedules and sleep patterns for a given period. FRA, in conjunction with its contractor (QinetiQ North

America, Technology Solutions Group), proposes to undertake the study described below in order to develop an understanding of the work schedule-related fatigue issues for train crews in commuter and passenger service.

The railroad industry, the public transit industry, the Brotherhood of Locomotive Engineers and Trainmen (BLET), and the United Transportation Union (UTU) all agree that the unique aspects of T&E workers' schedules in commuter/passenger operations needs to be studied before making any changes to regulations governing hours of service for this group. The BLET and the UTU strongly support this project on the study of fatigue as well as any recommendations that might result from it that would enhance the safety of its members and the public.

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, through its contractor (QinetiQ North America), seeks to document and characterize the work and rest schedules, as well as the sleep patterns, of train and engine service employees in passenger service by the use of a background survey and a daily log. Over a period of two weeks, T&E respondents will complete the background survey and daily log in order to convey as much detail as possible regarding their work, health, and rest activities. FRA will use the data obtained through this survey to identify whether or not this segment of the railroad workforce has a work and sleep schedule pattern that may compromise their ability to carry out their safety-critical role in railroad operations in a suitable manner. Of particular concern are those who work a split shift schedule. (A split shift work schedule involves a work period followed by an extended break and then a second work period later the same day.) The data for this worker population will be compared with similar data for other groups of railroad workers and documented adult norms. The work/sleep characteristics of this population will also be compared against work and sleep patterns that the sleep research literature has identified as being potentially problematic with respect to compromising cognitive or physical performance. This information will be used to inform both railroad/transit industry management and rail labor concerning the potential, or the lack thereof, for fatigue associated with various aspects of the work schedules of commuter and passenger train and engine service employees. The Federal Railroad Administration, through its Railroad Safety Advisory Committee (RSAC), will use this information to determine whether or not a change in hours of service limitations is necessary for T&E employees in passenger service.

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.

For many years, FRA has strongly endorsed and highly encouraged the use of advanced information technology, wherever possible, to reduce burden. The proposed data collection process does not lend itself to and, therefore, will not employ any automated, electronic, mechanical or other technological collection techniques. The nature of this data collection effort precludes the use of these types of methods because respondents must have the ability to record data when at work as well as when at home. For this reason, recording cannot be done from a central or common location with automated technology. Since this study will be conducted over a very limited time period (two weeks), providing each respondent with a handheld data collection device would not be feasible both in terms of the amount of information to be collected and in terms of cost.

It should be noted that the burden for this information collection is 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 work schedules, self-assessments of alertness, and data regarding sleep patterns of train and engine passenger service employees, such as the time of day sleep occurred, the duration of sleep, and other pertinent rest information that is relevant to this study. Analysis of work schedule-related fatigue requires work schedule and sleep information for the same time period. Train and engine service employees are subject to Hours of Service regulations; however, the Hours of Service records do not include data that are critical to the proposed study. Hours of Service records indicate *only* the hours that employees worked.

Similar data are 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.

This proposed collection of information does not impact small businesses because all of the data will be collected from T&E employees who are employed by three different commuter railroads that are operated by public transit agencies. One of these three agencies contracts the operation of a portion of its service to two Class 1 railroads. Study participants will record the data on their own time, not during working hours. Also, there is no cost for materials, since participating T&E employees will receive a background survey questionnaire and a daily log book from FRA's contractor (QinetiQ North America).

The proposed study will be undertaken for a very limited period of time -- two weeks. Consequently, the burden associated with this collection of information is 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, FRA would be unable to make an informed decision regarding hours of service limitations for train crews in commuter service because the agency would not have adequate information about current practices and their impact on employee alertness. By undertaking this study, FRA will also have an opportunity to examine the level of alertness reported by T&E employees in commuter and passenger service over various work schedules and to see how these work schedules relate to the reported levels of alertness.

Without this collection of information, the annual number of rail accidents/incidents and the number and severity of casualties both to railroad workers and others (passengers, train crews, motor vehicle operators, and pedestrians) might be greater than they need to be because no one looked at the role of fatigue and work/sleep activities, and whether rail worker fatigue either caused or contributed to collisions, derailments, malfunctioning equipment, and other untoward events that could have been prevented if ameliorating steps had been taken to reduce job-related fatigue.

In recent years worker fatigue, particularly among train and engine service employees, has received necessary and deserved attention; however, a scientifically determined characterization of the work/rest patterns of this subset of T&E workers is lacking. With the information that the proposed survey will provide, FRA can determine the extent to which the work/sleep patterns of this group of railroad employees are compromising their ability to work safely and, if so, through the RSAC process make necessary changes in the limits on the number of hours that train crews in passenger service may work.

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.**

This will be a one-time data collection effort. Participating T&E passenger service employees will complete a background survey, and will keep a log of their work and sleep times for 14 consecutive days. Studies of work and sleep patterns require data from at least a one week period. Data for two weeks are preferable so that the employee's ability to recover during rest days can be observed.

The survey instructions will specify that data collection should begin following a rest day. Because railroading is a seven-days-a-week job, not everyone works a Monday to Friday work schedule. The start of a railroader's work cycle can be any day of the week. To facilitate collection and analysis of the data, it is desirable that this limited flexibility in start date be allowed. (The prior study of all T&E employees, as well as similar studies of signalmen, maintenance-of-way employees, and dispatchers used this procedure.) Also, because this study is concerned with work schedules and sleep patterns, collection of data during a vacation period will not serve the purposes of the study. During the signalmen survey, several signalmen called QinetiQ North America for clarification as to whether or not they should record the data during a vacation period. In addition, several survey respondents did record data for a vacation period. For this reason, this point was included in the instructions for the three subsequent studies, and survey participants complied by recording data only during non-vacation periods. Similar wording is part of the instructions for the proposed passenger service survey. Respondents will return only the original survey and daily log in a postage paid envelope. There is no requirement to make or return multiple copies.

FRA and its contractor, QinetiQ North America (QNA), will treat the source of the data

as confidential. A unique ID number will be assigned to each participant. Only QNA will know the names of the participants and their corresponding ID numbers. The ID number will allow each diary to be paired with its corresponding background survey for purposes of data analysis. Once the participants have been compensated for their participation and the data is coded, the list of participant names and their corresponding ID numbers will be destroyed. At the same time, the page of each diary containing the individual's survey compensation selection and name will be destroyed. Only aggregate results will be reported. No data will be reported by individual or by railroad.

All other 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 May 21, 2009, soliciting comment on this particular information collection. See 74 FR 23927. FRA received one comment – a letter – in response to this notice.

The joint letter came from Mr. James Stem, National Legislative Director, United Transportation Union (UTU), and John Tolman, President, Brotherhood of Locomotive Engineers and Trainmen (BLET). The UTU represents 125,000 active and retired railroad, bus, and mass transit workers in the United States and Canada. The BLET is a rail labor organization that was founded as part of the Teamsters Union and represents

railroad engineers and railroad operating employees in the United States and Canada. In their extensive letter of support, Mr. Stem and Mr. Tolman stated the following:

Congress assigned FRA to prescribe regulations and issue orders to establish hours of service requirements for train employees engaged in commuter rail and passenger services. Those regulations may differ from the requirements of the Rail Safety Improvement Act (RSIA) requirements for Hours of Service (HOS) applicable to train employees engaged in freight service. In establishing this exception, Congress required FRA to consider scientific and medical research related to fatigue and fatigue abatement, scheduling practices and operating practices that improve safety or reduce employee fatigue. A significant body of scientific and medical research already exists. Also, the commuter and passenger services current scheduling and operating practices in use today mitigate fatigue substantially; so much so that only minor changes to the existing HOS regulations are necessary.

The “Fatigue Avoidance Scheduling Tool” (FAST) is a comprehensive and detailed analysis of how wakefulness affects fatigue and an individual’s effectiveness. The FAST model is based upon the SAFTE fatigue assessment tool which was developed for the U.S. Air Force and the U.S. Army. For a fatigue assessment tool to be useful, it must establish how fatigue impacts effectiveness and at which point reduced effectiveness might compromise safety. The FAST model has been validated for use in predicting effectiveness in freight railroad service, and we believe it can function as an appropriate tool to compare work schedules against a baseline representing the maximum schedule that can be worked under the statute. The current model is programmed to reflect sleep patterns in a workforce that reports for duty on call, and will need to be adjusted to reflect the different sleep patterns of workers with a known reporting time. We believe such an adjustment would permit the use of the FAST model to predict effectiveness among commuter and passenger train employees . . .

The medical research supports the conclusion that predictable sleep patterns can significantly diminish the fatiguing effect long hours have on employees. While not a panacea, predictability in work schedules certainly provides the employees with the opportunity to plan their rest. Individuals without regular work hours may find themselves un-rested if they have been at a doctor’s appointment or attending to an elderly parent or child when a call for duty comes. Since the commuter/passenger services serve the public their operations must be advertised to the general public. Train departures, and therefore work schedules, are highly predictable.

Obviously adequate levels of manpower are essential for the railroads to properly execute the operation of the scheduled service. Recently, the country has seen a significant increase in ridership in the commuter/passenger operations. With the current administration’s High Speed Rail initiative there is every reason to believe that this trend will continue for the foreseeable future. Coupled with the natural attrition of an aging workforce, manpower will be stressed for years to come.

Railroads must develop some objective means of determining an appropriate and safe level of manpower staffing. One commuter operation has chronic manpower shortages. So much so that the overwhelming majority of its regular assignments and all of its extra list assignments are required to work 6 days. It utilizes a supplementary volunteer extra list of regularly assigned employees (working their only day off) 7 days per week sometimes for weeks in a row simply to address its regular operation.

A fair assessment of operating and scheduling practices will minimize the impact of fatigue

on railroad operations, the employees and the general public that use the systems. Through the RSIA Congress instructed the secretary to implement regulations to reduce employee fatigue and improve safety. Fatigue can be effectively mitigated by addressing it before it occurs. Proper manpower staffing and construction of assignments are essential to ensure that outcome. By addressing fatigue at its base level (daily) through the use [of] quality restorative sleep from napping in conducive sleep environments and predictable, regular home sleep patterns the industry will have effectively reduced acute, cumulative and chronic fatigue from wakefulness to a safe level.

It should also be noted that the FRA and its contractor, QNA, have been in contact with representatives of the Brotherhood of Locomotive Engineers and Trainmen (BLET), the United Transportation Union (UTU), and the American Public Transportation Association (APTA) from the inception concerning the need for this survey and the proposed procedures. Both labor (BLET and UTU) and the transit industry (APTA) have made several useful suggestions, which have been incorporated into the design of this study. All three of these organizations are active participants in the study, but are not receiving any funding from either FRA or QNA for their contributions.

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

As with the earlier approved Railroad Signalmen Study (*OMB No. 2130-0558*), Maintenance of Way Employee Study (*OMB No. 2130-0561*), Dispatcher Study (*OMB No. 2130-0570*), and T&E Study (*OMB No. 2130-0577*), survey participants who voluntarily take part in the pilot T&E Passenger Service study will receive a \$75 gift certificate from QNA to a retail establishment. Survey participants who voluntarily take part in the larger (14-day) study will receive the same compensation from QNA. To be eligible for the gift certificate, participants must return a completed background survey and daily log with 14 consecutive days of data. Both groups of respondents will record data on their own time. In consideration of the effort involved, participants are being awarded the aforementioned gift certificate to motivate consistent and complete data recording and to have an adequate response rate. In addition, to encourage participation in the survey, the survey package that goes to each potential participant in the full survey will include a \$5 bill.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

FRA fully complies with all laws pertaining to confidentiality, including the Privacy Act of 1974. Thus, information obtained or acquired by FRA's contractor, QNA, from T&E passenger service employees will be used exclusively for statistical purposes, or in this case, to study the issue of work schedules, sleep patterns, and their relationship to fatigue. None of the information obtained that might be identifying will be disseminated or disclosed in any way. Moreover, the survey cover letter from the participant's labor

organization, the Brotherhood of Locomotive Engineers and Trainmen (BLET) or the United Transportation Union (UTU), will assure participants that their personal information will be kept private and that the data will be used to compile information for the group. This letter will also explain that the list of participants and any identifying information will be destroyed once all of the surveys and daily logs have been coded and accounted for. No micro-level data will be released to the public; only tabular data will be publicly available. Any tabular data will be aggregated in a manner that prevents identification of a specific individual. The survey will not ask participants for the name of the railroad that they work for, so reporting of the data by railroad will not be possible. The disclosure statement that will be a part of the background survey and the daily log is included on the two survey instruments that accompany this submittal.

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.

Participation in this study by T&E passenger service employees is completely voluntary. Thus, only those individuals consenting to participate in the survey will do so. The background survey will ask participants questions relating to demographics and work history. The list of survey questions includes items such as age, sex, general health, marital status, and number of dependents. There are also questions relating to life events, such as personal or family illness, marital difficulties, death of a family member, and financial difficulties, and questions relating to stress at work. These questions call upon respondents to indicate if any major stressful events occurred in their life in the past six months, and are necessary - and will be used - to qualify the data in the corresponding daily log. If a participant has experienced one of these events *and* his/her sleep data indicate difficulty sleeping, the researchers may decide to disqualify the data from the analysis. The purpose of this study is to assess work schedule-related fatigue. The presence of other factors that interfere with sleep would confound the analysis. FRA will not use the life event data for any other purpose. The technical report describing the survey procedures and results will explain the reasons for any data that were disqualified.

As mentioned earlier in response to question 10, the cover letter accompanying the survey will assure the confidentiality of the data that they provide. This letter will also explain that the list of participants and any identifying information will be destroyed once all of the surveys and daily logs have been coded and accounted for. In addition, both the background survey and the daily log will contain a statement regarding assurance of privacy.

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 W 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.**

Form	Number of Respondents	Number of Responses per Respondent	Time per Response	Total Burden in Hours
FRA F 6180.130 Passenger Service Employee Background Survey	410	1	15 min	103

FRA F 6180.131 Passenger Service Employee Daily Log	410	14	10 min	957
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Data will be collected only once for a 14-day period. There will be no data collection in subsequent years. Participants will fill out a brief background data form. This should take no more than 15 minutes, probably less. Each day, participants will make entries in a daily log. Daily entries in the log will be done several times over the course of a day, and should require no more than 10 minutes in total.

Total estimated burden for this entire information collection then is 1,060 hours.

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.**

There will be no additional cost burden to survey respondents. They will be provided with a postage paid envelope for returning the data collection instruments.

- 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.**

The total cost to the Federal Government totals \$242,850, which breaks down as follows:

Contractor Expenses

Preparation (including pilot survey)	\$ 52,500
Field Data Collection	\$ 84,850
Data Coding and Analysis	\$ 64,400
Reporting	\$ 41,100
<u>Total Contractor Cost</u>	\$ 242,850

Note: The above estimate includes the following items:

Printing and postage	\$ 20,040
Compensation for participants	\$ 33,125
Travel	\$ 2,900

Additional Cost to the Federal Government

An agency Psychologist (GS-15, Step 6)* will spend approximately one hour per month

for a period of 30 months, or a total of 30 hours, reviewing the study results for statistical accuracy and completeness. Thus, the Federal Government will incur an additional cost of \$3,570 (based on 2009 OPM Salary Table, 75 percent overhead cost included).

15. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

These are new information collection requirements for a one-time survey. Therefore, 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.

Analysis of the survey data will include descriptive statistics as well as simple bi- and multi-variate analysis of variance (ANOVA). The results of this survey will be presented in a FRA technical report. A summary of the results may also be presented at technical meetings, such as the annual meeting of the Transportation Research Board, and the annual meeting of the International Association of Railroad Operating Officers. The Brotherhood of Locomotive Engineers and Trainmen (BLET) will also publish a summary of the study results in its monthly publication, *Locomotive Engineers and Trainmen News*. Similarly, the United Transportation Union (UTU) will publish a summary in *UTU News*, its bimonthly publication.

The planned project schedule, shown below, assumes that FRA will receive OMB approval for the survey by the end of October 2009 and that the pilot study will be completed by that time.

Activity	Date
Preparation	July 2009 – October 2009
Pilot Study	September 2009
Field Data Collection	November 2009 – December 2009
Data Analysis	January 2010 – April 2010
Preliminary Result Briefing	April 2010
Final Briefing	June 2010
Draft Final Report	August 2010
Publication of Final Report	September 2010

Note: Respondents will be asked to begin data collection following a rest day. This will give reasonable assurance that the T&E employee is rested at the start of the data collection. Because passenger service operates 7-days per week, not all T&E passenger service employees have weekend rest days. Assuming that they have at least one rest day every seven days, in a worst case scenario, the individual would not begin data collection until seven days after receipt of the survey materials, and the materials would be returned to QNA approximately three weeks after receipt by the study participant. Participants will be instructed to return their survey materials promptly upon completion of the 14-day data collection period and a final due date will be included in the letter accompanying the survey materials.

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, the FRA will publish the approval number for these information collection requirements in the *Federal Register*.

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. Without this collection of information, FRA would lose a unique opportunity to help reduce the number and severity of railroad accident/incidents, and the number and severity of railroad worker casualties that occur each year because of fatigue or fatigue-related factors. By closely examining the work and sleep patterns of train and engine service employees that contribute to or cause levels of fatigue that either result in greater numbers of rail accidents/incidents or more numerous and/or more severe work-related injuries/fatalities, this collection of information provides the means for gaining a better understanding of fatigue that can be used by the various parties concerned with rail safety to implement corrective measures. Specifically, the insight gained from this study will enable FRA to offer concrete recommendations that can be used by both rail management and rail labor to alter those policies or those practices that detrimentally affect the conditions or circumstances under which train and engine service employees work every day. Although the number of rail accidents/incident and rail-related casualties has been declining over the last several years, FRA believes these numbers can be further improved. This collection of information offers another tool that FRA and the rail industry can use to improve the day-to-day rail environment and to further reduce -- to the lowest possible number -- accidents/incidents and rail-related deaths and injuries.

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