

**INFORMATION COLLECTION  
SUPPORTING STATEMENT  
TRACK INSPECTION TIME STUDY**

**FRA Form Numbers F 6180.136; F 6180.137; F6180.140; F6180.141; F6180.142; F6180.143**

**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 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.). According to the Federal Railroad Administration's (FRA's) Railroads Accident/Incident Reporting System (RAIRS) database, there were 146,247 incidents reported out of which 54,369 (37%) were track-related incidents during the years 1975-2008. For the year with the highest incidents, 1978, track-related accidents were 4,780 (43%) out of 11,233 total incidents, while for 2008 -- the last year with full records -- the number of track-related accidents dropped to 832 (32%) out of a total of 2,561 reportable incidents. These facts indicate that credible efforts were made by FRA and the railway industry to reduce the total number of incidents per year from 11,233 at the highest value to 2,561 in 2008, a reduction factor of 4.4. Track-related incidents were reduced by a factor of 5.7 over the same time frame, despite the reduction in track miles and almost double the freight-miles. Primary factors for this reduction were increased inspections, improved inspection techniques, and new inspection vehicles. In order to improve and/or maintain the current level of safety, an evaluation is required as to the quality and type of inspection performed. Information and technologies are readily available and are applied when it comes to quality control of mechanical inspection systems. However, little information is available to FRA as to the performance and quality of track inspectors using subjective judgment to inspect the track. To fill this knowledge gap and to address the concerns of The Rail Safety Improvement Act of 2008 (HR-2095; Public Law 110-432—Oct. 16, 2008) (RSIA 08), FRA proposes to conduct a study to gather information about railroad industry practices and experiences with track inspection methods, both visual and automated.

Obtaining insight into the effectiveness of track inspection methods requires data from track inspectors as well as railroad management. There is no readily available data for the evaluation of the track inspectors' job performance. FRA, in conjunction with its contractor -- QinetiQ North America Technology Solutions Group -- proposes to undertake the study described below in order to characterize how track inspections are conducted and to determine how they might be improved. The RSIA calls for this project on the study of track inspection and any recommendations that might result from it that would enhance rail safety.

The RSIA requires FRA to conduct a Track Inspection Time Study. Section 403 of RSIA mandates a report, no later than two years after enactment of RSIA, “. . . to determine whether -- (1) the required intervals of track inspections for each class of track should be amended; (2) track remedial action requirements should be amended; (3) different track inspection and repair priorities or methods should be required; and (4) the speed at which railroad track inspection vehicles operate and the scope of the territory they generally cover allow for proper inspection of the track and whether such speed and appropriate scope should be regulated by the Secretary.”

**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 Technology Solutions Group), seeks to document and characterize various aspects of track inspection through a series of two information gathering activities, one for track inspectors and another for their supervisors, railroad officials, and labor union officials. A mail survey will gather information from track inspectors. Structured telephone interviews will be conducted with track supervisors, railroad division engineers, railroad system level officers, and Brotherhood of Maintenance of Way Employes Division (BMWED) officials.

The goal is to develop information concerning:

- how track inspections are performed,
- how defects discovered during these inspections are remediated,
- the role of automated test equipment as it relates to track inspection,
- the role of track inspections in maintaining railroad safety,
- possible improvements to track inspections,
- if the speed of railroad track inspection vehicles is appropriate,
- impact of territory size and traffic density on track inspections.

FRA will use the data obtained through this study to determine whether or not this segment of the railroad workforce can properly find, report, and fix track defects in their safety-critical role in railroad operations. This information will be used to inform both railroad management and rail labor concerning the potential, or the lack thereof, for inspection errors. Further, this data will be used to evaluate the need for changes in the regulations that govern track safety. Railroad management can use this information to adjust/improve their inspection strategies in order to minimize track-related derailments. The results, which will be conveyed in FRA’s Report to Congress, could lead to adjustments of current regulations or the development of new track inspection regulations to reduce the number of track-related accidents.

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 on respondents. The proposed data collection process does not lend itself to and, therefore, will not employ any automated, electronic, mechanical, or other technological collection techniques. Some of the data collection will be in structured interviews, for which automated technology is inappropriate. In addition, the lack of readily available internet access among some individuals in the track inspector population precludes use of an internet-based survey instrument for track inspectors.

It should be noted that the burden for this information collection is already extremely 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.**

Presently, there is no information available regarding the various aspects of track inspection that this proposed study seeks to explore. To FRA's knowledge, data do not exist anywhere dealing with the performance and optimal number of track inspectors required for the maintenance of safe track. Under the current practice, track inspectors are assigned a specific territory to inspect and are asked look for a distinct list of items during their scheduled inspections.

Several years ago, the FRA Office of Safety worked with one Class I railroad to establish the appropriate number of track inspectors for their system. These data are not current and represent only one railroad. As such, they are not useful for the current purpose.

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 83-1), DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.**

In an effort to minimize burden, the proposed study aims to survey a small number of the approximately 2,500 train track inspectors who work throughout the United States. As a result, this proposed collection of information will have a very minimal impact on small businesses because most of the data will be collected from a random sample of

approximately 200 railroad track inspectors who are employed by the larger classes of American railroads. Respondents will record the data on their own time, not during working hours. The productivity of these workers will not be affected in any way. There will be a total of 47 phone interviews with track supervisors, railroad officials, and labor union officials. While these interviews will be conducted during working hours, FRA believes that the work time required is minimal. Only four (4) of the 47 interviews will be with employees of the short line/regional railroads, some of whom are small businesses.

Additionally, there is no cost for materials, since participating track inspectors will be mailed a survey questionnaire by FRA's contractor (QinetiQ North American Technology Solutions Group). The remaining information will be collected by structured interviews. These track supervisors and railroad officials who will be interviewed will come from Class I railroads, Amtrak, short line or regional railroads, an inspection contractor, a national labor organization. With the exception of some short line/regional railroads, these organizations are not small businesses. The proposed study will involve a one-time written survey requiring approximately 30 minutes to complete and phone interviews lasting approximately one hour each.

Again, it should be noted that the burden associated with this collection of information is already extremely 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 will not be able to meet the mandate of Section 403 of Rail Safety Improvement Act of 2008 (RSIA 08) to conduct the study and report to Congress. Without this proposed collection of information, FRA will be unable to determine if track inspection practices are adequate or whether new regulations are needed to ensure the safety of the nation's rail system.

If FRA is unable to conduct this collection of information, it will be hindered in making recommendations or suggestions to both rail management and rail labor groups that might improve rail safety by improving track inspection practices, procedures, and policies.

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 closely looked at the role of track inspection practices and procedures, and whether these rail track inspection practices and procedures either caused or contributed to collisions, derailments, malfunctioning equipment, and other untoward events that could have been prevented if mitigating measures had been taken to improve such practices.

In sum, the collection of information helps FRA to promote and enhance safe rail transportation throughout the United States. In this, it furthers both DOT strategic goals and objectives, and also the agency's core mission.

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 track inspectors will complete a written survey. Respondents will return only the original track inspector

survey in a postage paid envelope. There is no requirement to make or return multiple copies.

FRA and its contractor, QinetiQ North America Technology Solutions Group (TSG), will treat the source of the data as private and will protect the information to the extent provided by law. A unique ID number will be assigned to each survey participant. Only FRA's contractor TSG will know the names of the participants and their corresponding ID numbers. The ID number will allow TSG to follow up with track inspector survey recipients who have not responded. Once the closing date for return of the surveys has passed, the list of participant names and their corresponding ID numbers will be destroyed. Only aggregate results will be reported. Only QinetiQ will know the identity of the interviewees. No data, from either the survey or the phone interviews, 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 July 6, 2009, soliciting comment on the proposed data collection. See 74 FR 32029. FRA received one comment or letter in response to this *Federal Register* notice.

The letter came from Mr. Freddie Simpson, President of the Brotherhood of Maintenance of Way Employees Division of the International Brotherhood of Teamsters (BMWED). BMWED is a rail labor organization representing approximately 36,000 railroad workers who build, maintain, repair and inspect tracks, bridges, and related railroad infrastructure throughout North America. In his remarks, Mr. Simpson stated the following:

In response to the Proposed Agency Information Collection Activities; Comment Request published in the Federal Register on July 6, 2009, (Volume 74, Number 127, pages 32029-32030) BMWED supports the proposed study and related information collection activities. As such, BMWED respectfully requests OMB approval.

BMWED offers the following comments in support:

- The proposed collection of information is necessary for the Department to fulfill its Congressional mandate under the RSIA to conduct a track inspection time study. This Information is necessary to evaluate the conditions under which visual track inspections are conducted and to develop a report to the Congress responsive to Section 403 of the RSIA.
- The collected information will have practical utility to the Secretary of Transportation and the Federal Railroad Administration (FRA) in their analysis of track inspection issues within the industry.
- The Department's estimates of burden hours and costs are reasonable.
- The methodology proposed for this information collection activity is suitable and appropriate for the study and the respondent population and will facilitate the collection of data with high utility.
- The proposed information collection activity has been designed to be minimally burdensome on respondents and the proposed information collection activity is of limited duration.

Visual track inspections conducted under 49 CFR Parts 213.233, 213.235 and 213.365 play a vital and integral role in maintaining track structural integrity and the safety of railroad operations. BMWED believes that the "Track Transportation [track inspection] Time Study, OMB Control Number: 2130- NEW, Docket No. FRA-2009-0001-N-16" is necessary to allow the Secretary to fulfilling the Congressional mandate of Section 403 of the RSIA to: (1) determine whether the required intervals of track inspections for each class of track should be amended; (2) determine whether track remedial action requirements should be amended; (3) determine whether different track inspection and repair priorities or methods should be required; and (4) determine whether the speed at which railroad track inspection vehicles operate and the scope of the territory they generally cover allow for proper inspection of the track and whether such speed and appropriate scope should be regulated by the Secretary.

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

Survey and phone interview participants will not receive any payment or gift for their participation in the study.

**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 from track inspectors and others will be used for statistical purposes and to characterize issues related to safe and effective track inspections.

None of the information obtained that might be identifying will be disseminated or disclosed in any way. Moreover, a survey cover letter from the FRA Administrator will encourage participation, and will assure respondents of the privacy of the data that they provide and that the data will be protected to the full extent provided by law. This letter will also explain that the list of participants and any identifying information will be destroyed once all of the surveys have been coded and accounted for. At the start of each interview, the interviewer will make a statement regarding how the information will be kept private and how it will be used. The source of any information obtained from individuals via phone interview will not be identified. Only a summary of the responses will be reported.

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 employs them, so reporting of the data by railroad will not be possible.

**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 railroad personnel and labor organization officials is completely voluntary. Thus, only those consenting to participate in the survey or phone interview will do so. The survey will ask participants questions relating to their work history and training. No other personal or sensitive information will be a part of the



study. The purpose of this study is to characterize and assess track inspection procedures.

As mentioned earlier in response to question 10, the cover letter accompanying the survey will assure the privacy of the data that respondents provide. This letter will also explain that the list of participants and any identifying information will be destroyed once all of the surveys have been coded and accounted for. In addition, the track inspector survey will contain a statement regarding assurance of privacy. A similar verbal assurance of privacy will be part of the phone interview protocol for other individuals.

**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.**

<b>Form</b>	<b>Number of Responses</b>	<b>Time per Response</b>	<b>Total Burden in Hours</b>
FRA F 6180.136 Track Inspector Survey	217	30 min	108 hr
FRA F 6180.137 Track Supervisor Interview	25	1 hr	25 hr
FRA F 6180.140 Division Engineer Interview	8	1 hr	8 hr
FRA F 6180.141 System Level Officer Interview	8	1 hr	8 hr
FRA F 6180.142 BMWED General Chairman Interview	5	1 hr	5 hr
FRA F 6180.143 BMWED Dir. Education and Safety Interview	1	1 hr	1 hr
<b>TOTAL</b>	<b>264</b>		<b>155 hr</b>

**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 track inspector 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.**

Contractor Expenses

Development of Survey Methodology (including focus group)	\$79,100
Conduct Track Inspector Survey	\$35,900
Conduct Interviews	\$31,200
Documentation and Presentation of Findings	\$26,800
<u>Total Contractor Cost</u>	<b>\$173,000</b>

Additional Cost to the Federal Government

<b>Government Personnel</b>	<b>Hours</b>	<b>\$ Fully Loaded per Hour</b>	<b>Total</b>
Management	20	\$158.00	\$3,160
Researcher 1	150	\$138.00	\$20,700
Researcher 2	150	\$92.00	\$13,800
			<b>\$37,660</b>

**COST GRAND TOTAL** **\$210,600**

**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 for a one-time study. By definition, it is a **program change**. The total estimated burden for this proposed collection of information is 155 hours.

There is no cost to respondents, since the track inspector respondents will be provided with a postage paid envelope for returning the data collection instruments.

**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 involve primarily descriptive statistics. *t* tests and  $\chi^2$  tests will be used to examine selected issues. Specifically, FRA will compare the average daily time spent performing inspections on foot versus via hi-rail using a *t* test. A similar analysis will compare responses for individuals who work alone with those who work with another inspector. A  $\chi^2$  test will examine the frequency of different types of repairs performed by single inspectors versus two inspectors working together. Information gathered through the various phone interviews will be summarized and reported qualitatively. Since the questions are primarily open-ended, this is the appropriate method of analysis. Textual analysis will be employed to identify common themes in the comments. One exception will be a summary of the interviewees' responses to the table of common track condition detection methods. These will be tabulated.

The results of this study will be presented in FRA's Report to Congress as required by the RSIA. A separate summary of the results may also be presented in an FRA technical report.

The planned project schedule, shown below, assumes that the FRA will receive OMB approval for the study by January 1, 2010.

<b>Activity</b>	<b>Date</b>
Survey and Interview Preparation	July 2009-October 2009
Inspector Focus Group	August 18, 2009
Conduct Interviews	January 2010-February 2010
Inspector Survey Data Collection	January 2010
Survey Data Analysis	February-March 2010
Draft final report and briefing	April 15, 2010
Final report and briefing	May 15, 2010

**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 proposed 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 each year because of inspection-related factors. The proposed collection of information provides the means for gaining a better understanding of track inspection practices and procedures 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 and procedures that detrimentally affect the conditions or circumstances under which railroad inspectors' work every day. Although the number of rail accidents/incidents and rail-related casualties has been declining over the last several years, FRA believes these numbers can be further improved.

This proposed 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 extent -- the number of rail accidents/incidents and corresponding deaths and injuries that occur every year.

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

