

**Department of Transportation
Office of the Chief Information Officer**

**SUPPORTING STATEMENT
Annual Commercial Motor Vehicle Driver Survey:
Work and Compensation**

This Supporting Statement is developed to request the Office of Management and Budget's (OMB) review and approval of a new information collection (IC) entitled, "*Annual Commercial Motor Vehicle Driver Survey: Work and Compensation.*"

Section A. Justification:

1. Circumstances that make collection of information necessary.

The Federal Motor Carriers Safety Administration (FMCSA) needs a better understanding of the commercial motor vehicle (CMV) driving population. Driver-related factors are an important consideration in CMV crashes, but there is no central nationwide source of information describing the population of drivers holding a Commercial Driver's License (CDL) issued in the United States (U.S.). The FMCSA is interested in developing a survey process by which the Agency can collect this information on a regular basis from CMV drivers. However, identifying and recruiting current commercial motor vehicle drivers for participation in a survey can be difficult due to the nature of the occupation: the job is characterized by its transient nature, long stretches of time away from home, limited amounts of time in any given location, and high driver turnover rates. The method of implementation is often jointly determined by the availability of driver information (e.g., mailing lists) and resource constraints. Therefore, the purpose of this information collection is to conduct a pilot study of such a process by evaluating the effectiveness of two different survey methodologies: in-person interviews and mail surveys.

This information collection is intended as a purely methodological study. The FMCSA does not intend to conduct any rigorous analysis of this data to assess the impacts of proposed rules and potential improvements in its safety programs. Rather the information gathered on the effectiveness of the survey methodologies in this pilot study will be used by the FMCSA to design a separate, more substantive information collection.

The survey instrument designed for this pilot study allows the FMCSA plans to begin acquiring a better understanding of the commercial motor vehicle driving population by collecting demographic information and specific information on driver work history, work schedule, and compensation. *Driver work history* addresses how long a CMV driver has been working in the industry, his/her level of experience, and his/her type of experience. These items include questions regarding driver tenure with his/her current employer and the number of past employers to provide information regarding the driver turnover rate. Under these items, the agency would also collect information about driver training to understand how drivers learned to operate their CMVs and the amount of training that is ongoing in the industry. The *driver work schedule* item examines how much drivers work and the activities in which they are engaged when they work (e.g., driving time, loading time, waiting time). The FMCSA is interested in understanding whether drivers' work schedules are tracked and how they are tracked (e.g., with

paper log books or Electronic On-Board Recorders (EOBRs)). Finally, under the *driver compensation* item, the agency would collect information on how much drivers earn and how they are paid (e.g., salary, by hour, or by mile).

The authority to require carriers to maintain driver qualification files is 49 U.S.C. §§ 504 (Attachment A), 31133 (Attachment B), 31136 (Attachment C), and 31502 (Attachment D), and 49 CFR § 1.73 (Attachment E).

Statutory authority for regulating the hours-of-service of drivers operating CMVs is derived from 49 U.S.C. §§ 31136 (Attachment C) and 31502 (Attachment D). Title 49 CFR part 395 (Attachment F) of the Federal Motor Carrier Safety Regulations (FMCSRs) contains the driver Hours-of-Service regulations.

Data for this project would be collected via mail and via interviews. This information collection supports the DOT's Strategic Goal of Safety because the information would contribute towards helping the agency improve the safety of drivers who operate CMVs on our nation's highways.

2. How, by whom, how frequently, and for what purpose the information used.

The focus of this information collection is to develop a methodology for future information collections of the CMV driver population so that FMCSA can obtain a better understanding of the CMV population and its operating environment. The drivers' perspective is important for assisting the FMCSA identify the impacts of, and drivers' perceptions to, certain rulemakings requirements. Driver-level information regarding work history and compensation are commonly required for Regulatory Impact Analyses (RIAs) and other analyses, but these data are currently incomplete or absent in driver and carrier-level data sources. Demographic data, which is not generally available in other data sets, would also provide input to the FMCSA in determining what medium is effective for reaching drivers (e.g., do drivers have Internet access?).

The FMCSA would like to develop an annual survey process, by which CMV drivers are surveyed regularly. The results of this effort would allow FMCSA to track trends in driver demographics and industry work and compensation practices. There is currently no established methodology for the Agency to obtain input from a representative sample of CMV drivers. Therefore, this current information collection is intended to only be a pilot study of the survey process, and the results are intended to provide input into the design of a more comprehensive study to obtain estimates of the number of commercial motor vehicle driving population.

The results of the information collection would be summarized in a report for the Agency. The data would be aggregated into tables to show results across all respondents to provide a general understanding of the CMV driving population. This information would be used to provide a picture of the CMV population for use in future research and to inform the Agency on future initiatives as appropriate.

3. Extent of automated information collection.

Data for this project would be collected via mail and by driver interviews. Zero percent (0%) of the responses would be submitted electronically (e.g., via the Internet), since it is not yet known to what extent CMV drivers have Internet access. Determining drivers' access to and use of the web is one of the goals of this survey. The interviewers may use laptops or computers to enter the answers provided by drivers.

4. Efforts to identify duplication.

There has not been a recent survey of commercial motor vehicle drivers to identify their demographic characteristics, work experience, work schedule, or compensation. An earlier survey conducted in 1997 by the University of Michigan collected some similar information, but it is believed that the driving population has changed significantly over the past decade that its use is questionable. Although several surveys have since provided information on these topics, no one survey addressed all the items of interest to the FMCSA, and the responses across surveys showed a great deal of variability due to differences in the participant population and survey methodology. Thus, it is difficult to build a clear picture of the CMV population from the existing information set forth in the outdated surveys.

5. Efforts to minimize burden on small businesses.

The intended response population for this information collection is commercial motor vehicle drivers. While some CMV drivers may work for a small business or be an owner-operator, the information collection is voluntary, so only willing drivers or owner-operators will participate in this information collection activity. Additionally, because the response time for the survey instrument is estimated at approximately 15 minutes, this one-time data collection is not considered to be burdensome on small businesses. Every effort has been made in the design of the survey instruments to limit questions to those absolutely necessary.

6. Impact of less frequent collection of information.

Without this survey, the FMCSA would not be able to identify or characterize the CMV driver population nor understand drivers' perceptions regarding the impact of current regulations on driver safety. It is also intended that some of the items on the survey be collected on a regular basis in order to develop trend or time series data to describe the CMV population.

7. Special circumstances.

There are no special circumstances related to this information collection.

8. Compliance with 5 CFR 1320.8.

On December 12, 2008 (73 FR 75793), (see Attachment G), FMCSA published a notice in the **Federal Register** requesting public comments on the proposal and this new information

collection. One comment from the Owner-Operator Independent Drivers Association, INC (OOIDA) was received from the public in response to this notice (Attachment H). OOIDA expressed support for the survey and provided several suggestions on how the survey questions and methodology for collecting the data could be improved. FMCSA will consider these suggestions during the implementation of the survey (Attachment I). In addition, FMCSA published a second notice (see Attachment J) on June 02, 2009 (74 FR 26458) with a 30 day comment period that announced this new information collection would be submitted to OMB for approval.

9. Payment or gifts to respondents.

Half of the respondents would be compensated with a \$10 gift card for participating in the survey. The gift card would be handed to the driver by the interviewer after the interview. For the mail-in survey, the gift card will be mailed to the driver with the survey, but it will not be activated until the survey is returned.

Commercial vehicle drivers are typically paid by the mile and therefore any time spent not driving is money lost. In addition, commercial vehicle drivers are a hard-to-reach population. Thus, the use of incentives is expected to increase drivers' interest in, and response to, the survey.

10. Assurances of Confidentiality.

This collection will be kept private to the extent possible under law.

11. Justification for collection of sensitive information.

This information collection involves some data of a sensitive nature. The agency has taken all reasonable steps to limit access to this data (see # 10). The survey instrument contains questions regarding CMV driver compliance to the FMCSA's Hours-of-Service (HOS) regulations. The FMCSA is interested in gathering this information only to understand CMV drivers' perceptions of the impact of the HOS regulations on their personal lives; the questions are not intended to result in any enforcement action. Additionally, CMV drivers will be informed that they do not need to answer any questions they consider to be of a sensitive nature.

12. Estimates of burden hours for information requested.

The information collection focuses on commercial motor vehicle drivers. The information collection burden is estimated to be 15 minutes per respondent, as determined through pre-testing of an initial survey on 9 CMV drivers. The information collection seeks responses from 500 drivers via a mail survey and 600 drivers via in-person interviews. The hourly burden for this information collection activity is estimated as follows:

Mail-in: Response burden is estimated at 15 minutes per respondent to answer survey questions. The estimated annual burden for this information collection activity is **125 hours** [500 drivers x 15 minutes = 125 hours].

Driver Interviews: Response burden is estimated at 15 minutes per respondent to answer survey questions. The estimated annual burden for this information collection activity is **150 hours** [600 drivers x 15 minutes = 150 hours].

Estimated Total Annual Hours: 275 hours [125 hours for mail-in + 150 hours through driver interviews = 275 hours]

Estimated Annual Number of Respondents: 1100 drivers [500 mail-in + 600 interviews = 1100].

Estimated Annual Number of Responses: 1100 responses [1100 respondents x 1 response each = 1100].

The U.S. Department of Labor, Bureau of Labor Statistics provides the following mean hourly wages for three different classes of commercial motor vehicle drivers (see <http://www.bls.gov/oes/current/oes533099.htm>):

<u>Occupation Title</u>	<u>Mean Hourly Wage</u>
<i>Truck Drivers, Heavy and Tractor-Trailer</i>	\$17.46
Drive a tractor-trailer combination or a truck with a capacity of at least 26,000 gross vehicle weight (GVW), to transport and deliver goods, livestock, or materials in liquid, loose, or packaged form. May be required to unload truck. May require use of automated routing equipment. Requires a commercial drivers' license.	
<i>Truck Drivers, Light or Delivery Services</i>	\$13.23
Drive a truck or van with a capacity of under 26,000 GVW, primarily to deliver or pick up merchandise or to deliver packages within a specified area. May require use of automatic routing or location software. May load and unload truck. Exclude "Couriers and Messengers".	
<i>Motor Vehicle Operators, All Other</i>	\$12.76
All motor vehicle operators not listed separately.	
AVERAGE	\$14.48

The average hourly rate a commercial motor vehicle driver earns is \$14.48/hr. Using this rate, the estimated total annual cost to respondents for completing the surveys is \$3,982 [275 annual burden hours x \$14.48 respondents cost per hour = \$3,982.00]

13. Estimates of total annual costs to respondents.

None except reported in Item 12 above.

14. Estimate of cost to the Federal government.

The total Federal government budget for this information collection is \$285K (K = thousands), itemized as follows:

COST TO FEDERAL GOVERNMENT	
Tasks	Total costs, by task
Project Management costs	\$10,000
Development of survey design and protocol	\$8,000
Development and pre-testing of survey instrument	\$11,000
Server preparation (survey security, backup, software updates)	\$4,000
Preparation of OMB package	\$12,000
Acquisition and conduct of survey via driver interviews	\$99,000
Acquisition and conduct of survey via mail-in	\$101,000
Statistical analysis	\$18,000
Preparation of reports	\$22,000
Total costs, all tasks	\$285,000

15. Explanation of program changes or adjustments.

This program change increase of 275 annual burden hours is due to a new information collection.

16. Publication of results of data collection.

The results of the surveys would be analyzed and provided to the FMCSA. Quantitative estimates appearing in the report would be calculated using standard statistical methods that flow from the straightforward sample design of the survey. The results would be aggregated by the particular subset of commercial motor vehicle drivers (i.e., short-haul, regional, and long-haul). Survey results would be available to the public on the FMCSA Web site at www.fmcsa.dot.gov. The Volpe National Transportation Systems Center would also publish a final report that describes the survey goals, methodology, and results. This report would be available to the public at the FMCSA web site at www.fmcsa.dot.gov.

17. Approval for not displaying the expiration date of OMB Approval.

The FMCSA is not seeking an exemption from displaying the expiration date on the information collection questionnaires.

18. Exceptions to certification statement.

None

Attachments:

- A. Title 49 U.S.C. § 504 titled, "Reports and records."
- B. Title 49 U.S.C. § 31133 titled, "General powers of the Secretary of Transportation."
- C. Title 49 U.S.C. § 31136 titled, "United States Government regulations."
- D. Title 49 U.S.C. § 31502 titled, "Requirements for qualification, hours-of-service, safety, and equipment standards."
- E. Title 49 CFR § 1.73 titled, "Delegation to the Administrator of the Federal Motor Carrier Safety Administration."
- F. Title 49 CFR part 395 titled, "Hours-of-Service of Drivers."
- G. 60-day Comments Request Federal Register Notice (73 FR 75793), December 12, 2008.
- H. Public Comment to 60-day notice.
- I. FMCSA reply to respondent.
- J. 30-day Comments Request Federal Register Notice (74 FR 26458), June 2, 2009.