

SUPPORTING STATEMENT
FOR
CONSOLIDATED LABELING REQUIREMENTS FOR
MOTOR VEHICLES (EXCEPT THE VIN)
(FMVSS Nos. 105, 135, 205, 209 and Part 567)

OMB Clearance Number 2127-0512

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A JUSTIFICATION

This document renews the previous version of the Supporting Statement for Consolidated Labeling Requirements for Motor Vehicles (Except the VIN) (OMB Control Number 2127-0512).

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

49 U.S.C. 30111 authorizes the issuance of Federal Motor Vehicle Safety Standards (FMVSS) and regulations. The agency, in prescribing a FMVSS or regulation is to consider available relevant motor vehicle safety data, and consult with other agencies as it deems appropriate. Further, the statute mandates that in issuing any FMVSS or regulation, the agency considers whether the standard or regulation is "reasonable, practicable and appropriate for the particular type of motor vehicle or item of motor vehicle equipment for which it is prescribed," and whether such a standard will contribute to carrying out the purpose of the Act.

The Secretary is authorized to issue, amend, and revoke such rules and regulations, as he/she deems necessary. The Secretary is also authorized to require manufacturers to provide information to first purchasers of motor vehicles or motor vehicle equipment when the vehicle or equipment is purchased, in a printed matter placed in the vehicle or attached to or accompanying the equipment. In addition, this collection supports the Department of Transportation's strategic goal in safety, by working towards the elimination of transportation related deaths and injuries.

Using this authority, the agency issued the following FMVSS and regulations, specifying labeling requirements to aid the agency in achieving many of its safety goals (Attachment 2):

FMVSS	Date of Issue	Effective Date	Federal Reg. Cite	Section
105	7/19/76	7/19/76	41 FR 29696	S5.4
135	2/2/95	2/2/95	60 FR 6434	S5.4
205	1/2/68	9/9/68	32 FR 2414	S6.0
209	1/4/69	7/1/71	34 FR 15421	S4.1(j) and (k)
567	4/14/71	6/1/71	36 FR 7056	S567.4

FMVSS No. 105, “Hydraulic and electric brake systems” and FMVSS No. 135, “Light vehicle brake systems”

FMVSS Nos. 105 and 135 require, under Section 5.4, that each vehicle shall have a brake fluid warning label including a statement about brake fluid requirements in letters at least one-eighth of an inch high on or near the master cylinder reservoirs and located so as to be visible by direct view.

FMVSS No. 205, “Glazing materials”

FMVSS No. 205 specifies requirements for glazing materials for use in passenger cars, multipurpose passenger vehicles, trucks, buses, motorcycles, slide-in campers and pickup covers designed to carry persons while in motion. The standard establishes a glazing manufacturer’s identification system and specifies certification and marking for each piece of glazing material. Certification for the items listed comes in the form of a label, tag or marking on the outside of the motor vehicle equipment and is permanently affixed and visible for the life of the motor vehicle equipment.

The purpose of this standard is to aid in reducing injuries resulting from impact to glazing surfaces, and to ensure a necessary degree of transparency for driver visibility. Both glass and plastics are considered to be glazing materials, which provide safety and minimize the possibility of occupants being thrown through the vehicle window in the event of a crash.

[NOTE: FMVSS No. 205 requires cleaning instructions for glazing materials in every Owner's Manual. These provisions are contained under the OMB Clearance Number 2127-0541. This justification for Assigning DOT Code Numbers to glazing manufacturers is solely for certification of compliance with this standard.]

The detailed requirements for labeling are included verbatim as Attachment 2 (from the technical references included in FMVSS No. 205).

In general, the following information is required:

- Manufacturer's distinctive trademark

- Manufacturer's "DOT" code number
- Model of glazing (alpha-numerical designation)
- Type of glazing (there are currently 13 items of glazing ranging from plastic windows to bullet resistant windshields).

In addition to these requirements that apply to all glazing, certain specialty items such as standee windows in buses, roof openings and interior partitions made of plastic require that the manufacturer affix a removable label to each item. The label specifies cleaning instructions that will minimize the loss of transparency. Other information may be provided by the manufacturer but is not required.

FMVSS No. 209, "Seat belt assemblies"

S4.1(j) of FMVSS No. 209 requires safety belts to be labeled with the year of manufacture, the model, and the name or trademark of the manufacturer. Additionally, replacement safety belts that for specific models of motor vehicles must have labels or accompanying instruction sheets to specify the applicable vehicle models and seating positions (S4.1(k)). All other replacement belts are required to be accompanied by an installation instruction sheet.

Seat belt assemblies installed as original equipment in new motor vehicles are not required to be labeled with position/model information. This information would be useful only if a new assembly already installed in a vehicle is removed with the intention of using the assembly as a replacement in another vehicle; this is not a common practice. Therefore, labeling of original equipment seat belt assemblies is not required.

Part 567, "Motor Vehicle Certification Regulations"

49 U.S.C. 30111 requires each manufacturer or distributor of motor vehicles to furnish to the dealer or distributor of the vehicle a certification that the vehicle meets all applicable FMVSS. This certification is required by that provision to be in the form of a label permanently affixed to the vehicle. Under 49 U.S.C. 32504, vehicle manufacturers are directed to make a similar certification with regard to bumper standards. To implement this requirement, NHTSA issued 49 CFR Part 567. The agency's regulations establish requirements for form and content of the certification labels.

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

- FMVSS No. 105, "Hydraulic and electric brake systems" and FMVSS No. 135, "Light vehicle brake systems"

These standards establish requirements for labeling to be placed on or near the master cylinder reservoir in such a manner that the label conforms to this standard and is permanently affixed, engraved, or embossed. The statement must read as follows: "WARNING, clean filler cap before removing, use only ___ fluid from a sealed container." This information is used by

owners or operators and service people to select the proper brake fluids and to take the necessary caution needed in handling the caps of fluid reservoirs.

The purpose of these standards is to insure safe braking performance under normal and emergency conditions. This applies to passenger cars, multipurpose vehicles, trucks and buses with hydraulic service brake systems. Each manufacturer must identify the recommended fluids to be used in each vehicle it manufactures. If the labeling requirements are not mandatory, the likelihood of the addition of improper fluids into a brake system would increase as well as the possibility of dirt contamination.

- FMVSS No. 205, "Glazing materials"

In accordance with FMVSS No. 205, before a manufacturer can produce glazing materials for automobiles, a letter must be written to the NHTSA showing an interest in marketing their materials in the United States. Each piece of glass, plastic or combined glass-plastic glazing material installed in a motor vehicle or equipment must be identified by a series of markings. This mark is referred to as the "DOT Code Number." This code number identifies the original glass or plastic manufacturer. Each manufacturer has only one code number for each specific glazing material, which is assigned by NHTSA and is reported once and becomes valid indefinitely as long as the requesting manufacturer remains in business. The Office of Vehicle Safety Compliance will receive, review and assign DOT Code Numbers. The information collection process is to identify the manufacturer's materials and to identify their product in crashes involving defects. The technical field of automotive glazing has become increasingly specialized over the years and many manufacturers produce more than one or two varieties. If this reporting requirement were discontinued, the ability to determine identification of glazing manufacturer would be placed in jeopardy.

After obtaining an identification number, a manufacturer must mark each piece of automotive glazing using a fixed format for labeling specified in FMVSS No. 205. Glazing not marked properly would not conform to FMVSS No. 205 and therefore could not be offered for sale in motor vehicles in the United States. Each prime glazing material manufacturer must use the guidelines established in FMVSS No. 205 to label each piece of manufactured glazing.

Permanent labeling is usually accomplished during the manufacturing process through the application of a stencil to each piece of glazing. A different stencil is required for each distinct model number. Several techniques are available for actual use of the stencil such as heat transfer, sand blasting or linking, but the most popular method for glass materials is the use of a ceramic frit (or "ink") which is applied over the stencil and then heated to a relatively high temperature to "fix" the process.

There are two separate requirements for labeling glazing materials. The first requirement is that the manufacturer's assigned code number is affixed to the glazing. This requirement is termed "DOT Code Number Assignment" and is reported to OMB separately in OMB Clearance Number 2127-0038. The second requirement is for the model number of the glazing. This OMB justification deals only with the model number assignment and labeling process, as described below.

Each manufacturer must determine that the model of glazing which is being labeled is actually in compliance with the applicable safety requirement, that suitable documentation exists in establishment of technical audit trails, and that the required sampling, testing, and procedures for implementation are suitable for production use.

The purpose of the labeling is to provide public documentation that each piece of automotive glazing material is certified by the manufacturer as being in compliance with the applicable safety requirements. If this labeling were omitted, the lack of safety labeling would cause confusion in the automotive environment: owners would be unsure that their glazing was adequate, State inspection agencies would find inspection chaotic, and glass dealers would find the replacement process incumbered by unnecessary paper work in order to determine suitable replacement material. In addition, it would be virtually impossible, in case of a serious accident or other glazing problems, to establish the origin of the glazing.

- FMVSS No. 209, “Seat belt assemblies”

FMVSS No. 209 currently prescribes specific information that each manufacturer must place on each seat belt assembly whether it is for installation in a new vehicle or for after market sales. If the seat belt assembly does not conform with the requirements of the standards, it cannot be offered for sale in the United States. Although the manufacturers may permanently and legibly mark the seat belt webbing with the required information, typically they use a sewn-on cloth label stamped with indelible ink. Cloth strips are fed through a printing machine, then cut into the individual labels, which are then sewn onto the webbing during the stitching operation that secures the webbing to the metal components of the seat belt assembly.

- Part 567, “Certification”

Part 567 provides tangible evidence of the identity of the company which is responsible for a vehicle's compliance with safety and bumper standards. In the case of vehicles manufactured by more than one company, the label identifies which company is responsible for which portion of the overall compliance. In the event of any safety-related problem with the vehicle, this information could be of use to the vehicle owner or an accident investigator. The label also provides other information of use to the consumer, including the date of manufacture of the vehicle, the gross vehicle weight rating, and its gross axle weight rating.

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.**

The brake fluid reservoir labeling requirements in FMVSS Nos. 105 and 135 are met by vehicle manufacturers primarily by automatically embossing or engraving the required information onto the reservoir during the reservoir manufacturing process. This process does not involve the generation or storage of information by the government or the vehicle manufacturers. Information technology is used to design the process in which the required information is affixed to the brake fluid reservoir.

As for the other standards covered by this collection, NHTSA has not considered other methods of information collection or other forms of permanent notification of the identification information for the subject motor vehicle equipment. This safety information is needed throughout the useful life of the equipment and the manufacturers apparently have developed efficient, practical and inexpensive solutions to the labeling requirements. For example, the current labeling requirements are etched on glass or other glazing, appear on metal tags affixed to the vehicle body, or are affixed to vehicle equipment, such as the brake fluid reservoir. As an alternative, a paper label affixed to the motor vehicle equipment could be used as point-of-sale information, but obviously would not be useful throughout the life of the equipment, and could be subject to accidental or inadvertent removal at any time after its initial application.

At best, to reduce the burden for glazing manufacturers in requesting an identification number, the agency is encouraging electronic submission of their information. However, the respondents may choose to submit the requested information by mail in a prescribed electronic format, such as Word and Excel. Currently, 75% of the respondents are using electronic submissions with 100% of the requested information and 25% of the respondents are submitting by mail.

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

- FMVSS No. 105, “Hydraulic and electric brake systems” and FMVSS No. 135, “Light vehicle brake systems”

NHTSA is the only Federal agency that mandates labeling requirements for brake fluid reservoirs. Therefore, there is no duplication of effort. Also, there is no similar information that can be used to serve the same purpose as the reservoir label requirement.

- FMVSS No. 205, “Glazing materials”

Prior to the enactment of the National Traffic and Motor Vehicle Safety Act of 1966, manufacturers were not required to label their glazing. Those that did so were voluntarily following guidelines for marking safety glazing materials as set forth in American National Standard Z-26 -- a set of industrial guidelines established by a private organization (the

American National Standards Institute). These guidelines suggested that each piece of glazing be legibly and permanently marked with the words or equivalent abbreviation) "American National Standard," and the type and designation of the glass. Thus, although there was no legal requirement for labeling, a suggested format had already been established and to a large extent, was being complied with voluntarily by industry. Subsequent to the enactment of the Act of 1966, all of the above information was incorporated virtually intact by reference in FMVSS No. 205, the glazing materials standard. Thus, the previous voluntarily provided label has been made legally necessary to certify compliance to Federal safety requirements. The only additional piece of information which was added to the label was the requirement to include the manufacturer's Department of Transportation (DOT) code number assignment.

This number is assigned by special request of the prospective manufacturer in accordance with FMVSS No. 205. NHTSA is the only Federal government agency with legal authority to regulate automotive glazing. No duplication of the reporting system exists.

- FMVSS No. 209, "Seat belt assemblies"

Prior to the enactment of the National Traffic and Motor Vehicle Safety Act of 1966 (U.S.C. 1392), manufacturers were not required to label or mark their seat belt assemblies. The marking or labeling of seat belt assemblies was incorporated into FMVSS No. 209 as a legal requirement as a result of the Act of 1966.

Thus, similar information already available was used to the maximum extent possible, and no further modification is necessary, except as stated herein to provide for vehicle make and model designation in the label. No other Government agency has authority to require seat belt assembly labels, so there is no duplication.

- Part 567, "Certification"

No other Government agency requires safety certification labels to be placed on a motor vehicle and consequently no similar information was available.

In summary, NHTSA is the only Federal agency requiring manufacturers to label motor vehicles and motor vehicle equipment with the information required by Part 567.

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

Small businesses are not involved since most labels and requests for identification numbers would be made by the manufacturer. The physical processes involved in labeling as required by the various safety standards cited in this submission are longstanding industrial practices and have reached a level where it is difficult to improve efficiency. No burden reduction is possible since the burden is already at a minimum.

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

All labeling included in this collection is placed on motor vehicle equipment at the time it is manufactured. All safety labeling requirements are necessary for vehicle use on the nation's highways. The lack of labeling could allow improper items of motor vehicle equipment to be installed on motor vehicles and could be the subject of failures causing vehicle crashes, injuries and deaths.

As for the identification of glazing manufacturers, the collection of information is only required one time. Absence of this DOT code mark would mean the glazing material would be available to the public without manufacturer's proof that the material passed minimum safety standards. Additionally, if the information were not collected, the ability to determine the identification of the glazing manufacturer in crashes involving defects would be placed in jeopardy.

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

There are no special circumstances requiring labeling requirements or assigning manufacturer glazing identification numbers to be reported in a manner inconsistent with these guidelines.

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

On January 3, 2011, a request for public comment was published in the Federal Register (76 FR 210) soliciting comments regarding the existing OMB control number 2127-0512, "Consolidated Labeling Requirements for Motor Vehicles (except the VIN)." A copy of the Federal Register Notice is included as Attachment III. (No comments were received on this notice.)

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

No payment or gift will be provided to any respondent.

10. **Describe any assurance of confidentiality provided to respondents.**

Assurance of confidentiality is neither desired nor necessary in this situation because all of the required information is intended to be accessible to any interested party.

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

The information provided is not of a sensitive nature or commonly considered private. Therefore no additional justification is necessary. In the assigning of glazing identification numbers, the identity of the company and information on how to get in contact with the company (such as the address) is the only information being collected.

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

- FMVSS No. 105, “Hydraulic and electric brake systems” and FMVSS No. 135, “Light vehicle brake systems”

Number of labels	15,500,000
Frequency (performed during manufacturing processing)	1
Technical burden (time required for affixing labels)	0.0002 hrs
Total annual burden	3,100 hrs

- FMVSS No. 205, “Glazing materials”

The burden hours are assessed as follows:

(1) Request for Identification Number

The information collection is routinely handled as part of the daily workload of the preparing office. Estimates are based on an expected one hour to prepare the request. There is no record keeping burden attached to the respondent. New manufacturers write one letter each, identifying their company as a potential manufacturer of glazing material. Therefore, based on an average of about 25 new respondents per year (based upon averages from 2007 to 2010) who request DOT code numbers, the estimated burden to each respondent is 1 hour, which produces a total cost of approximately \$500.00 each year for all respondents (assuming a \$20 per hour charge).

(2) Labeling for Glazing Materials

First, each new manufacturer must provide facilities for record keeping associated with the various paperwork involved in designing and developing a stencil suitable for marking the glazing. The manufacturer must also allow for time to suitably plan and develop an appropriate stencil, and to create quality control procedures to assure that the format of the stencil actually complies with the requirements stated in FMVSS No. 205.

For the purpose of this justification, it is estimated that for each of the 25 new manufacturers a total of 40 man hours of effort will be expended to complete the aforementioned administrative detailed planning for each of the glazing models which are being manufactured.

Second, it will be necessary for the manufacturer to physically prepare a stencil suitable for use of the production line. In addition to an initial period of preparation, the manufacturer would probably conduct a brief but realistic pilot trial to assess the adequacy of the stencil for production work, and to correct any deficiencies noted at the last minute. For the purpose of this justification, it is estimated that a total of 0.23 man hours of effort will be expended by each manufacturer to complete the necessary technical evaluations of the stencil for each of the designated model numbers and to affix the label to the material (a process requiring time because it is done in conjunction with other manufacturing processes.)

For the purposes of this analysis, it will be necessary to estimate the total number of new model numbers which are introduced worldwide on an annual basis by glazing manufacturers. The most realistic estimates for this figure range from 150 to 200 new models per year, depending on the perceived need by manufacturers for new models of glazing such as blue tinted side windows or clear bullet resistant windshields. For the purpose of this evaluation, a point estimate of 175 new model numbers per year is made in order to estimate annualized costs.

Number of new glazing manufacturers per year	25
Number of new glazing models per year	175
Frequency of response	1
Technical annual burden for each new manufacturer (man hours)	40 hrs
Technical burden per new glazing model (man hours)	0.23 hrs
Total burden hours ((25 x 40) + (175 x 0.23))	1,040.25 hrs

- FMVSS No. 209, “Seat belt assemblies”

Burden hours associated with this standard are assessed as follows:

First, the manufacturer must develop the necessary paperwork for making the stamp for production line usage. The basic format of the label does not change, and a onetime design of the stamp was accomplished many years ago, therefore, there is no annualized burden associated with the design. Since the stamp can readily be changed by removal of a number or letter and insertion of a new one into the stamp, the annual administrative burden to plan and develop a stamp that complies with the requirements contained in FMVSS No. 209 is estimated to be on the order of 0.5 man-hours per manufacturer for each seat belt assembly model.

Second, it will be necessary for the manufacturer to conduct a short pilot run to assure that the printing machine produces correct labels. This brief technical evaluation is estimated to be in order of 0.25 man-hours per manufacturer for each seat belt assembly model. The above estimates may be pooled as follows to arrive at the total annualized cost to the manufacturer. For the purposes of this analysis it will be necessary to estimate the total number of new models which are introduced worldwide on annual basis by each seat belt assembly manufacturer. Each new passenger car model could require the seat belt manufacturer to create up to 25 or 30 new seat belt assemblies depending on occupancy and color coding of belt webbing, and each new truck, multipurpose vehicle, or bus model could require up to 15 or 20 new seat belt assemblies. However, many new vehicles can and do use the same model seat belt. For the purpose of this evaluation, a point estimate of 10,605 new seat belt assembly models per year is made in order to estimate annualized costs.

The new proposal would remove a labeling requirement for belts installed in new vehicles and provide manufacturers with additional flexibility in providing position/model information for replacement belts, thereby reducing burden as presented in the following calculations.

The previous estimate for the total annualized costs to respondents was derived as follows:

NEW SEAT BELT LABELS

Manufacturing of the Label Stamps

- (1) Number of new seat belt assembly model numbers per year -----10,605
- (2) About half require new label stamps -----5,302
- (3) Number of hours to support each stamp (man hours) -----0.6
- (4) Technical burden to support each stamp (man hours) -----0.25
- (5) Total burden per stamp (man hours) -----0.85
- (6) Estimated annualized burden total (man hours) -----4,507

Production Labels for all Safety Belts

- (7) Approximately 8.08 million passenger cars are produced annually with an average of 5 seat belt assemblies per vehicle.
- (8) Approximately 7.45 million trucks, multipurpose vehicles, and buses and produced with an average 3.5 seat belt assemblies per vehicle.
- (9) Total seat belt assemblies to be labeled ----- 66.5 million
- (10) Total number of seat belt manufacturers ----- 15
- (11) Total each manufacturer produces each year ----- 4.43 million
- (12) High speed printing machine time to ink labels at the rate of 8 per second or -----0.0000347 hrs.
- (13) Total technical annual burden (man hours) ----- 2,307
- (14) Total burden per year (4,507 hrs. + 2,307 hrs.).....6,814

- Part 567, “Certification”

Approximately 1,000 motor vehicle manufacturers are affected by the regulation. One label must be affixed to each vehicle produced, except for vehicles manufactured in more than one stage; for the latter vehicles, a label must be affixed by each partial manufacturer. For General Motors, 3 million or more labels would be affixed annually. For a small trailer manufacturer, fewer than 100 could be involved annually. The total number of labels affixed should be approximately 12,000,000. The man hour burden per label will also vary greatly perhaps involving one second per label for a large company and an average man hour burden of .005 hour per label. The total burden for the industry would therefore be 60,000 hours. The requirement, which prescribes the importers to respond to the amended Part 567 for the 500 respondents, at 6.01 hours per response, is estimated at 3,005 burden hours.

Additionally, on February 4, 2005, NHTSA published a final rule (see 70 FR 7422) that adopts new information labels for approximately 40 incomplete motor vehicle manufacturers. NHTSA estimated that the labels will be placed on approximately 556,000 vehicles per year. The label will be placed on each vehicle once. Since, in this final rule, NHTSA specifies the exact content of the labels, the manufacturers will spend 0 hours developing the labels. NHTSA estimated the technical burden time (time required for affixing labels) to be .0002 hours per label. NHTSA estimated that the total annual burden imposed on the public as a result of the incomplete vehicle manufacturer labels will be 112 hours (556,600 vehicles multiplied by .0002 hours per label). Canada already requires this on incomplete vehicles and many manufacturers already install this label on a voluntary basis for vehicles sold in the United States. Therefore, in total, the annual burden hours for Part 567 is 63,117 (60,000 + 3,005 + 112) hours.

In summary:

Regulation or Standard	Number of Respondents	Rate of Burden/equip(hours)	Total Yearly Burden (hours)
FMVSS 105/135	24	0.0002	3,100
	25	1	25
	25	40	1,000
FMVSS 205	175	0.23	40
FMVSS 209	15	0.0000347	6,814
Part 567	1000	0.005	63,117
Total	1266		74,096

Therefore, the yearly burden rate for manufacturers to label the items of motor vehicle equipment is 74,096 hours.

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

- FMVSS No. 105, “Hydraulic and electric brake systems” and FMVSS No. 135, “Light vehicle brake systems”

The cost to the respondents is approximately \$62,000 per year. This estimate is based on a \$20 per hour cost times 3,100 annual burden hours.

- FMVSS No. 205, “Glazing materials”

The cost to the respondents is approximately \$21,300 per year. This estimate is based on a \$20 per hour cost times 1,065 annual burden hours. It is not possible to estimate the annualized costs for the removable labels for certain specialty items of plastic glazing because these are manufactured only on an “ad hoc” basis for such items as interior partitions or standee windows in buses. There is no record keeping burden to the respondent in the assigning of glazing identification numbers.

FMVSS No. 209, “Seat belt assemblies”

The cost to the respondents is approximately \$136,280 per year. This estimate is based on a \$20 per hour cost times 6,814 annual burden hours

- Part 567, “Certification”

The cost to the respondents is approximately \$1,262,340 per year. This estimate is based on a \$20 per hour cost times 63,117 annual burden hours

Summary estimate of total annualized cost to respondents or recordkeepers

Regulation or Standard	Total Yearly Cost
FMVSS 105/135	62,000
FMVSS 205	21,300
FMVSS 209	136,280
Part 567	1,262,340
Total	1,481,920

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

- FMVSS No. 105, “Hydraulic and electric brake systems” and FMVSS No. 135, “Light vehicle brake systems”

There is no annualized cost to the Federal government as the manufacturers certify that the labels meet the requirements for this regulation. There is no exchange of correspondence, tabulation of data or response necessary.

- FMVSS No. 205, “Glazing materials”

1. Request for Identification Number

The cost to the Federal Government associated with generating the letters, and assigning the DOT code numbers is absorbed by the Office of Vehicle Safety Compliance staff members along with their other duties. Collecting, telephoning, processing, and analyzing the letters is not a significant burden for the staff. We estimate an annual cost of \$4,000.00, to the Federal Government. This includes record keeping, maintenance of log books, mail services, and maintenance of a computerized data base of all glazing manufacturers.

2. Labeling for Glazing Materials

For the Federal government, there are virtually no annual costs discernible in support of the labeling requirements, other than the maintenance of contact with persons outside the agency to obtain views on the labeling requirements. This ad hoc consultation is more completely described in item 9 above, and corresponding annualized cost estimated are developed below.

- (a) Pro rata share of HOTLINE discussion dealing with requirements for automotive glazing labeling:

(1)	Estimated annual number of HOTLINE calls dealing with labeling -----	12
(2)	Approximate estimated duration of call (hours) -----	0.1
(3)	Approximate additional administrative or technical time per call (hours) -----	0.5
(4)	Total estimated man hours to complete each call (Sum of 2 and 3) -----	0.6
(5)	Estimated man hours, HOTLINE support (man hours) -----	7.2
(6)	Estimated man hours cost, based on \$20.00 per man hour -----	\$144.00

- (b) Pro rata share of attendance at SAE Z-26 technical committee meetings:

- (7) Estimated number of annual meetings -----4
- (8) Estimated average cost of meeting attendance, in general, (includes salary of attendee, per diem and travel costs, and costs or preparation for attendance) -----\$201.00
- (9) Estimated costs associated with committee attendance, in general (7 x 8)-----\$804.00
- (10) Estimated percentage of costs associated with the specific topic of glazing labeling -----10%
- (11) Estimated annualized costs to the Federal Government for committee attendance for purpose of labeling discussions (9 x 10)---- \$80.40

(c) Estimated total annualized costs to Federal Government (glazing labeling) (Note: Costs of preparation of material and publishing lists of current DOT code number assignments in Federal Register not included because these costs are accrued in accordance with OMB 2127-0038) (Sum of 6 and 11) -----
 \$224.40

- FMVSS No. 209, “Seat belt assemblies”

For the Federal Government, there are virtually no annual costs discernible in direct support of the labeling requirements. Negligible discussion of labeling has occurred during the SAE subcommittee meetings. HOTLINE inquiries and written correspondence from the general public regarding labeling requirements have been virtually nonexistent.

- Part 567, “Certification”

Since this regulation involves a labeling requirement, there are no costs for the Federal government. The only possible Federal costs would involve incorporation with our overall enforcement program, and these costs have been estimated as negligible because they occur as part of a labeling requirement that the manufacturer, not the federal government, must meet.

Summary estimate of annualized cost to federal government

FMVSS No. 105 and 135 -----none

FMVSS No. 205-----\$4224.40

FMVSS No. 209-----none

Part 567 -----none

Total-----\$4224.40

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

The burden reduction is due to the reduced number of glazing respondents. In the previous submission, NHTSA estimated that there would be 26 new glazing manufacturers per year requiring 1,066 yearly burden hours to comply with the requirements of the information collection. This resulted in a total yearly burden of 74,137 hours and a total annual cost of \$1,482,740 for the whole information collection. In this information collection, we estimate there will be 25 new glazing manufacturers per year requiring 1,025 yearly burden hours to comply with the requirements of the information collection. This results in a total yearly burden of 74,096 hours and a total annual cost of \$1,481,920 .

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

The agency has no plans for the publication of the labeling requirements on FMVSS Nos. 105, 135, 205 and 209, and Part 567 other than already existent in the applicable FMVSSs or Regulations.

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 Submissions." of OMB Form 83-I.

No exception to the certification statement are made.

B. COLLECTION OF LABELING FOR STATISTICAL METHODS

The labeling requirements for the motor vehicle equipment to the requirements of FMVSS Nos. 105, 135, 205 and 209 and Part 567, do not employ any statistical methods, and therefore, are exempt from applying the criteria of Section B within this Supporting Statement.