Supporting Statement for Consumer Education Program for Fuel Economy; GHG, Other Emissions, and Alternative Fuels
Qualitative Research Plan

Submitted: March 3, 2011

Contents

Justification

The Energy Independence and Security Act of 2007 (EISA) was amended to include Consumer Information and Consumer Education programs to the Corporate Average Fuel Economy (CAFE) standards (49 USC § 32908[1]). Under EISA, National Highway Traffic Safety Administration (NHTSA), in consultation with Department of Energy (DOE) and Environmental Protection Agency (EPA), is required to develop and implement a program to require manufacturers to label new automobiles sold in the United States with information on vehicle performance on the basis of fuel economy, greenhouse gas (GHG) emissions and other emissions over the useful life of a vehicle and to create a rating system for consumers to easily compare fuel economy, GHG and emissions at the point-of-sale. In addition, NHTSA, by rule, must provide direction to manufacturers regarding a permanent and prominent display labeled on automobiles capable of operating on alternative fuels and to ensure that the owner's manuals of vehicles capable of operating on these fuels, including the renewable nature and environmental benefits of using alternative fuels, include information describing capability and benefits of using alternative fuels. The rulemaking deadline is 42 months after the enactment of EISA, which is June 2011.

Concurrently, the EPA, exercising authority under 49 USC § 32908 (b), is revising the current Fuel Economy label in an effort to accommodate Electric Vehicles (EV), Extended Range Electric Vehicles (EREV) and Plug-in Hybrid Electric Vehicles (PHEV) entering the market in early 2011 as 2012 model year vehicles. NHTSA and EPA have, therefore, come to the agreement that the EPA will conduct all research in collaboration with NHTSA to implement the fuel economy labeling requirements set forth by EISA. As such, EPA is taking the lead conducting the necessary market research portion related to fuel economy label content and, in particular, content related to EV, EREV and PHEV, that will gather data upon which the labels will be created and the consumer education program will be developed. NHTSA will take the lead developing the necessary steps to meet the consumer education campaign requirements as defined in EISA regarding Fuel Economy, GHG and other emissions labeling leveraging the EPA lead research. However, NHTSA will also be independently leading the obligations associated with developing rules for a permanent and prominent display on automobiles capable of operating on alternative fuels, ensuring that owner manuals of vehicles capable of operating on alternative fuels include information describing capability and benefits of using alternative fuels and educating consumers about the benefits of thermal management technologies including energy efficient air conditioning systems and glass.

After the market research process, NHTSA will then take charge of creating the consumer education campaign with relevant content, consumer-facing messages and communication materials. The education program will be targeted for implementation by June 2011.

NHTSA is submitting this information collection request to conduct qualitative research in support of the consumer education program.
This research will be guided by two broad objectives:

[1] A full text copy of this code is included with this package as Appendix A. Also, included as a separate appendix is a copy of the relevant section of 49 U.S.C. § 32908 as Appendix B for easy reference.

1) Test consumer comprehension of existing fuel economy-related content[2]. The research will explore:
    a. Among consumers, what is the existing level of knowledge regarding fuel economy and where did consumers obtain the information they already have?
    b. What knowledge gaps are important to address through NHTSA's consumer education program?
    c. In terms of fuel economy, GHG and other emissions, alternative fuels and thermal management technologies, what issues do consumers care most about?
    d. Does the existing fuel economy-related content already collected by NHTSA (Appendix C) add to their current levels of knowledge?
    e. Is the fuel economy-related content written in a way that is clear and comprehendible?

2) Test consumer-facing messages related to NHTSA's consumer education campaign. The research will explore:
    a. Do these marketing messages effectively encourage consumers to seek fuel-economy related content from NHTSA?
    b. What are the best methods (*i.e.*, channels of communication) for reaching consumers with these messages?

Having completed a review of the existing research that EPA has conducted with regard to fuel economy labeling, NHTSA recommends conducting qualitative research that will provide meaningful insights to help inform the development of the consumer education campaign. These focus groups will allow us to explore consumers' current understanding of automobile performance with regard to fuel economy, GHG emissions and other pollutant emissions and the availability and benefits of alternative fuels and thermal management technologies. Additionally, this focus group research will provide an opportunity to evaluate and refine consumer-facing messages using direct consumer input.

NHTSA plans to conduct eight (8) focus groups in four (4) cities across the U.S. The recommended cities will account for geographic diversity and a variety of perceptions of fuel economy, GHG and other emissions, alternative fuels and thermal management technologies. Some cities are more eco-conscious, some are more congested, while others have more accessibility to alternative fuels or tax breaks and special permissions (*i.e.*, HOV lane use) for hybrid vehicle purchasers. By speaking with consumers in diverse cities, we will have a broad representation of motivations for considering fuel economy, GHG and other emissions, alternative fuels, and thermal management technologies when purchasing a vehicle.

[2] Note that for the purposes of this information collection request the term "fuel economy-related content" encompasses information on the impact of driver behaviors and vehicle maintenance on fuel economy as well as the relationships between a vehicle's fuel economy and GHG and other emissions, alternative fuels and thermal management technologies. This content is included in the Messaging Audit document which can be found in Appendix C of this package.

We recommend holding focus groups in the following cities:

- Northern New Jersey (New York City metro area)
  - Rationale: High-congestion market in the northeast
- Minneapolis, Minnesota
  - Rationale: Highest concentration of alternative fuel stations in the U.S.
- Atlanta, Georgia
  - Rationale: High-congestion market in the southeast
- Phoenix, Arizona
  - Rationale: Hot climate market where thermal management technologies may provide significant benefit

For the purposes of this study, the recommended screening criteria are broad enough to include a cross-section of all vehicle drivers and purchasers throughout the U.S. Potential subjects will be asked several questions to determine their eligibility to participate in the focus groups. Respondents will be screened based on the following criteria:

- Participants must be 18 years or older.
- Participants must currently possess a valid driver's license.
- Participants must currently own or lease a vehicle.
- Participants must be the primary or a shared decision maker for vehicle purchases in their household.

A draft qualitative screener is included in this package as Appendix D.

Respondents in each city will be split into one of two groups: (1) Females; and (2) Males. It is our experience that in mixed-gender focus groups that cover technical or vehicle information, males will dominate the conversation and the females in the room will defer to their opinions. Splitting the groups in each city based on gender will allow us to collect information and feedback from both genders to inform the communications campaign.

Each focus group will last approximately two hours, and will include eight to 10 participants. Trends heard throughout various conversations will inform the consumer education plan and will be tested quantitatively through additional research. Throughout these groups, there will be opportunities to include quantitative aspects; however, strategic recommendations will be based on an analysis of conversations that explore whether or not consumers understand the fuel economy-related content being communicated and whether or not the messages provide consumers with the information they require and encourage them to seek out additional relevant information. A copy of the discussion guide is included in this ICR package as Appendix E and the corresponding workbook that includes print-outs to be used throughout the discussion is attached as Appendix F.

The following sections describe the justification for this proposed consumer research plan in detail.

A1. 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.

As required by 49 U.S.C. § 32908 (g), NHTSA, in consultation with EPA and DOE, must develop a consumer information and education program to improve consumer understanding of automobile fuel economy, GHG emissions and other pollutant emissions; of automobile use of alternative fuels; and of thermal management technologies used on automobiles to save fuel and reduce GHG emissions.

Consumer Information, Consumer Education, 49 U.S.C. § 32908 (g)(2):
EISA requires NHTSA to develop and implement through rulemaking a consumer education program to provide information about fuel economy, GHG emissions, other emissions, alternative fuels and thermal management technologies.

The specific objectives of the education program, as stated in EISA, are to:

- Improve understanding of automobile performance on the basis of fuel economy and greenhouse gas emissions and other pollutant emissions over the useful life of the vehicle;
- Inform consumers of the benefit of using alternative fuel in automobiles;
- Inform consumers about locations of stations with alternative fuel capacity; and,
- Educate consumers about fuel savings that would be recognized by purchasing a vehicle equipped with thermal management technologies (*e.g*., energy-efficient air conditioning systems and glass).

In order to effectively achieve the objectives of the consumer education program and fulfill its statutory obligations, NHTSA is requesting to conduct qualitative research with consumers to assess current levels of knowledge surrounding these issues, explore currently available fuel economy-related content for clarity and understanding, evaluate potential consumer-facing messages and their potential to encourage consumers to seek more fuel economy-related information from NHTSA, and explore the communications channels in which these messages should be present. The research will allow NHTSA to refine messaging to enhance comprehension and usefulness of relevant content and will guide the development of an effective communications plan.

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections for this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter. The full text is included in this package as Appendix G.

A2. 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.

The purpose of this consumer research is to gather critical information that will allow NHTSA to fulfill its role in educating consumers about fuel economy, GHG emissions, other emissions, alternative fuels, and thermal management technologies pursuant to EISA. The findings from this proposed research will assist NHTSA in ensuring that the relevant content is comprehended by consumers and can help them in improving their vehicles' fuel economy and lowering emissions by making them aware of the behaviors that affect a vehicle's fuel economy and the available fuels and technologies.

The research will be used to inform the development of a campaign that aims to increase awareness and improve comprehension about vehicle fuel economy, GHG emissions and other vehicle emissions, as well as alternative fuels and thermal management technologies. This research plan leverages the findings from the recent EPA research about fuel economy labeling. NHTSA will take the necessary steps to avoid unnecessary duplication. The research may be used to guide and refine the fuel economy-related content and consumer-facing messaging that will be used throughout the consumer education campaign by identifying what relevant issues consumers care most about and what information they still need to make more informed purchases and driver behavior decisions.

A3. 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 the electronic submission of responses, and the basis for the decisions for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Qualitative data collection will be completed face-to-face, in a group discussion setting. A face-to-face setting is the best approach for this exploratory phase of research as the groups will provide a deep conversation about fuel economy, GHG emissions, other emissions, alternative fuels and thermal management technologies. The discussion will be helpful in gaining an understanding of consumers' perceptions, opinions, and beliefs regarding relevant issues. Video and audio recordings of these discussions will be available to assist in transcription and report writing, but no other automated technologies will be used. Participants will be informed of all technologies in use prior to the discussion.

A4. 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.

NHTSA researchers have extensively reviewed recent studies pertaining to the Fuel Economy program. EPA, in collaboration with NHTSA, has recently conducted a multi-phased consumer research project in support of the agencies' joint rulemaking on fuel economy, as part of which NHTSA is implementing its

§ 32908(g)(1) responsibilities. EPA's research focused on the labeling piece of the rule. NHTSA will now look to build upon this research, utilizing key findings and conducting further consumer research that will be instrumental in guiding NHTSA's consumer education program. This new collection will provide insights into the current levels of awareness and comprehension of fuel economy issues, GHG and other emissions issues, alternative fuel benefits and capabilities, and thermal management technology benefits. For this campaign, NHTSA is already committed to leveraging content that currently exists; however, gaining an understanding of consumer engagement with and comprehension of this content will be essential to the success of the program.

The research will also help to identify the needs and motivations of the target audience, allowing NHTSA to understand what issues consumers care most about and what messages may affect behaviors and will identify the most effective and relied-upon communications channels through which to reach consumers. This exploration will include both the current sources of information that consumers use for fuel economy-related issues, as well as new sources that could be created for consumers to access this information. NHTSA will look to build upon the research conducted by EPA and identify what sources may currently be underused and where consumers can benefit from seeing this information. Prior research shows that the majority of consumers research their vehicle purchase prior to visiting a dealership, so many sources considered will reflect this.

NHTSA is mindful of the information that has already been collected from consumers through EPA's efforts and has worked with parties within NHTSA and other agencies and third-party partners to ensure all questioning is relevant, useful and puts no undue burden on respondents.

A5. 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 focus group research involves randomly selected individuals who will be contacted at their homes and asked to participate in a discussion group at a local facility. The collection of information will not impact small businesses.

A6. 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.

NHTSA has conducted a messaging audit (Appendix C), which identified existing content related to fuel economy, GHG and other emissions, alternative fuel and thermal management technology information. NHTSA must explore consumer comprehension of and engagement with this content in order to assess what consumers already know, what they need to know, and what issues they care most about. This exploration will help dictate what content should be included in the program (*i.e.,* what content can be leveraged, what content must first be refined and what new information consumers need) and where this information is best placed.

Without exploring these themes with consumers, NHTSA risks developing a consumer education program that is neither relevant nor effective.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that is not consistent with the guidelines in 5 CFR 1320.6.

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

A8. 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 these comments.

A notice for public comment for this proposed research plan was published in the Federal Register (75 FR 54218-54219) on September 3, 2010. The initial 60-day public comment period ended on November 2, 2010 and the research received two comments.

Robert Johansson of the USDA requested edits to the language used in the Greenhouse Gases and other emissions content. These changes have been implemented. Mr. Johansson also requested additional questions for the discussion; however, this line of questioning has been evaluated and ultimately deemed to be out of the scope of this research.

Additional comments received requested revisions to the content within the messaging audit. These revisions have been reviewed and incorporated.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Focus group participants are provided a cash honorarium as compensation for their time. This honorarium is provided as an incentive for participants to take the time to travel to the focus group facility and participate in the discussion (therefore minimizing participant out-of-pocket expenses), as well as a sign of appreciation for their thoughts and opinions. The amount necessary for a focus group honorarium generally varies by market, level of screening criteria and difficulty of obtaining participation from certain target participants. Given the general consumer nature of these groups and required participants, we estimate the honorarium to be $75 per participant. Within each market, compensation will be equal for all participants.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

For this focus group research, any personal information, such as a respondent's name and telephone number, will only be used for the purposes of recruitment or conducting the discussions. Respondents will be face-to-face with the moderator and NHTSA team members will observe the groups, but privacy will be protected to the extent permitted by law. Prior to the start of the discussion, the moderator will assure participants that they will not be identified in reporting or documentation resulting from the research. Throughout the group discussion, participants will only be identified by first name and any video or audio recordings of the focus groups will be in the sole possession of NHTSA.

A11. 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 research will not include any questions of a sensitive or private nature.

A12. Provide estimates of the hour burden of the collection of information.

The focus group research will require approximately two (2) hours per group. NHTSA recommends conducting two (2) focus groups each in four (4) cities.

Qualitative Phase	Participants Per Group	Total Groups	Hours per Group	Total Group Hours	Total Participant Hours
Focus Groups in 4 Cities	8	8	2	16	128

In sum, NHTSA anticipates interviewing a total of 64 respondents and estimates a total burden of 128 hours.

\$15.95 per hour[3]	x 128	\$2,041.60

[3] From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2009 National Occupational Employment and Wage Estimates.

A13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

The only cost burden any respondents throughout this research plan will experience are the costs related to travel to and from focus group facilities. These costs are minimal and will ultimately be offset as focus group participants will be provided a cash honorarium (detailed in items A9 and A14).

Assuming respondents travel a maximum of 60 miles round-trip to and from the facility, the estimated maximum travel costs for all participants will be:

City	Maximum Recruited Participants Per Group	Maximum Total Recruited Participants	Maximum Miles Traveled	IRS Standard Mileage Rate[4]	Total Mileage Costs
Focus Groups in 4 Cities	12	96	60	$0.50/mile	$2,880

Focus group participants generally travel far less than 30 miles one-way to participate and ultimately travel costs vary per person. This is meant to be an estimate of the maximum costs that respondents could be expected to incur.

There will be no record keeping or reporting costs to respondents.

A14. Provide estimates of annualized costs to the Federal government.

The costs associated with the qualitative phase of this research include direct costs such as facility rental, technology use (i.e. audio and video recordings), participant incentives, and staff travel.

Estimated Direct Costs:
- Facility Rental & Technology Use - $16,000
- Recruitment and Incentives - $15,000
- Staff Travel - $5,000 per person (includes all four cities)

Final costs will depend on services and technologies used, number of staff in attendance, number of respondents that arrive, and other needs. Travel cost estimates include airfare, hotel room, ground transportation, and other incidental expenses.

All staff travel will be billed to this project at cost and using government rates and rules. Actual costs may vary and are dependent on dates of travel and focus group schedule.

[4] From Internal Revenue Services' 2010 Standard Mileage Rate for business miles driven.

Partner Hours

Staff time for our research partners is calculated using negotiated per hour billing rates. The hours estimated here are based on hours needed for past qualitative projects of a similar scope. These hours include time needed for focus group preparation, group moderating, data analysis and reporting, as well as meetings and conference calls with the NHTSA team.

Level	Labor Hour Rate	Estimated Hours	Estimated Total Costs
Vice President (a.k.a. Research Director)	$210	95	$19,950
Senior Account Executive (a.k.a. Project Manager)	$125	150	$18,750
Assistant Account Executive (a.k.a. Research Assistant)	$100	175	$17,500
Total Partner Staff Time			**$56,200**

The total estimated cost for this qualitative research program is **$87,200**, without travel. The final cost will be dependent on the number of NHTSA and partner staff that will be required to travel to each focus group location and actual staff hours required.

A15. 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 information collection as a result there is a program change of an additional 128 burden hours added to NHTSA's overall total.

A16. For collections of information whose results will be published, outline plans for tabulation and publication.

NHTSA expects to receive interim reports from our research partners following the first focus group city, with a follow-up report delivered one week after focus group completion. A final focus group report will be delivered two weeks after all focus groups are completed. Additionally, NHTSA will plan to meet with research partners between focus groups to discuss key findings, evaluate the success of the groups, and make any necessary adjustments to the discussion guide.

Below is the anticipated timeline for data collection. Final dates of deliverables will be dependent on the date of OMB approval.

Date	Research Activity
Week 1	• Plan approval received • Focus group facilities contracted
Week 2	• Recruiting conducted
Week 3	• Recruiting completed for first 2 cities • Focus groups held in 2 cities • Recruiting continues for final 2 cities
Week 4	• Recruiting completed for final 2 cities • Focus groups held in final 2 cities
Week 5	• Results analyzed • Top-line findings memo submitted to NHTSA
Week 6	• Analysis continues
Week 7	• Final qualitative report delivered, including transcripts, video files and any other materials collected or created

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We do not seek approval to not display the expiration date for OMB approval for this research plan.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exceptions to the certification are required for this research plan.