

Supporting Statement for Tire Fuel Efficiency Consumer Information Program Focus Group Research

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Section A

A. Justification

The Energy Independence and Security Act of 2007 (EISA)¹, enacted in December 2007, included a requirement that the National Highway Traffic Safety Administration (NHTSA) develop a national tire fuel efficiency program to educate consumers about the effect of tires on automobile fuel efficiency, safety and durability. The goal of this program is to provide consumers with a convenient way of determining the effect of tire choices and the potential tradeoffs between tire fuel efficiency and tire safety and durability.

Under the EISA, NHTSA is required to establish a replacement tire fuel efficiency rating system, determine methods for providing tire rating information to consumers and develop a national tire maintenance consumer education program. The enactment of the new rating system will require tire manufacturers to rate their replacement tires across three aspects of tire performance: rolling resistance (one measurement of fuel efficiency), wet traction (one measurement of safety) and tread wear life (one measurement of durability). Comparing the three different ratings for replacement tires will enable consumers to see how different tires can affect the fuel economy performance of their vehicles.

At the time of the final rule (Appendix A), which was signed by Administrator Strickland on March 23, 2010, NHTSA did not specify the content or requirements of the consumer information and education portions. Several comments on the notice of proposed rulemaking (NPRM) suggested the agency consider additional consumer research to decide on the best methods for communicating tire ratings to consumers. These comments, which are summarized in section A8 of this document, have led NHTSA to recognize that a revised consumer research methodology could provide advanced understanding of how the presentation of rating information affects both consumers' perceptions and behaviors in the replacement tire purchase process. This new collection will focus more on consumer *understanding* of proposed rating systems, rather than just preference.

The full research program comprises three phrases: 1) consumer focus groups; 2) interviews with tire retailers; and, 3) quantitative survey research with consumers. This information collection request package pertains only to the consumer focus groups.

NHTSA is submitting this request to conduct qualitative research to ultimately assess consumer understanding of the tire ratings and guide the development of the consumer information program. To do this, NHTSA must first explore consumers' current tire knowledge and the tire purchase process. Then, NHTSA will be able to test ratings and potential communication channels.

Specifically, this research will be guided by the following objectives:

¹ Pub. L. 110-140, 121 Stat. 1492 (Dec. 18, 2007)

1) *Understand the tire purchase process from the consumer's perspective.*

Past research for this initiative demonstrated that 81% of consumers have purchased tires in the past because they were worn, while only 36% said it was because of an emergency (margin of error +/- 2.2%)². A number of groups that submitted comments to the NPRM believe most tire replacement purchases come at a time of emergency and that consumers do not research these purchases. Further research is needed to develop a more comprehensive understanding of the process. This will allow NHTSA to explore potential communications channels (including whether or not a paper label is a viable communication tool) and determine the ultimate needs of the consumer information program.

2) *Evaluate comprehension of various ratings, exploring the clarity, meaningfulness and the likely resulting behaviors.*

At this point, there is dispute over whether or not consumers see tires before they are installed. Therefore, we cannot assume that the final creative will be a paper label affixed to a tire. However, before determining what channels to use, NHTSA must first explore how well consumers *understand* the ratings systems. This includes testing ratings based on Rolling Resistance Coefficient (RRC) and Rolling Resistance Force (RRF) to evaluate basic conceptual understanding and to establish which rating system is better understood by consumers based on the need or desire to compare tire ratings across sizes³.

We will also determine which rating system is clearest to consumers, or if there is even enough comprehension of the various systems to recommend one as superior. To do so, NHTSA will explore what various ratings (*i.e.* 1-star vs. 2-star, 50 vs. 60, etc.) mean to consumers and determine whether or not these interpretations are valid. Various graphical treatments including categorical, numerical and endorsement-type rating systems will be tested to determine which consumers understand best.

3) *Explore potential channels for communication.*

Once NHTSA establishes which rating system consumers understand best, the agency can then evaluate how best to communicate the information. Various communication channels, such as web-based formats, in-store kiosks, booklets, brochures and paper labels, will be explored, as will the language that will be used to convey the information. This portion of the discussion will focus on the potential channels and will probe for information needs by channel, channel availability, potential for use and consumer preference.

4) *Understand consumers' knowledge of tire maintenance and performance.*

An important piece of the consumer information program will include educating consumers about tire maintenance to help improve the performance of those tires already on the road and build better habits for the future. By developing an understanding of consumers' current knowledge and behaviors, NHTSA can begin to craft educational messages about tire fuel efficiency, safety and durability that are clear and useful. Additionally, NHTSA will be able to assess how well consumers currently understand the connection between rolling resistance, tread wear, and wet traction with fuel efficiency, durability and safety, so the agency can establish communications that can truly help consumers in their replacement tire purchase decisions.

² NHTSA Rolling Resistance Survey. Online survey conducted by Strat@comm, August 2009.

³ RRC is equal to RRF divided by the tire size's prescribed load.

NHTSA has consulted with research contractors, StrategyOne, as well as contacts at Volpe National Transportation Systems Center (Volpe Center), Food and Drug Administration (FDA), Environmental Protection Agency (EPA) and Federal Trade Commission (FTC) in developing this research approach. The agency is requesting approval to conduct consumer focus groups to help satisfy NHTSA's statutory requirements to effectively provide the ratings and other information necessary to assist consumers in their replacement tire purchase decisions.

This research approach, as detailed in the following sections, will include six (6) consumer focus groups in three (3) cities with vehicle owners, ages 18 or older, who have either purchased replacement tires in the last six months or plan to purchase replacement tires in the next six months. Respondents who work in the automotive or tire industries will be screened out. A copy of the proposed screening criteria is included in this package as Appendix B.

Consumer focus groups will be conducted in Boston, Mass., St. Louis, Mo., and San Francisco, Calif. to achieve geographic diversity. We have sought comments on the inclusion of California in this research program. In 2003, the California legislature adopted Assembly Bill No. 844 (AB 844)⁴, which required the California Energy Commission to develop a comprehensive fuel efficient tire program.⁵ In 2009, a draft regulation was made public which specified testing and reporting requirements for manufacturers, described the database of fuel efficiency of replacement tires sold in California, and defined a "fuel efficient tire."⁶ As a result of these regulations, we will look to San Francisco consumers as a group that is more exposed to the issues of fuel efficiency and tires.

In each city, we will conduct two, 2-hour long focus groups, with one group comprising males and one group comprising females. We recommend dividing groups by gender because based on experience, in mixed groups that discuss issues related to vehicles, women generally defer to male opinions rather than providing their own, well-thought-out opinions and perspectives.

The purpose of the focus groups is to allow NHTSA to view members of the target audience discussing and considering relevant tire issues in a relaxed setting. The discussions will provide us with background information on the tire purchase process and provide an opportunity for consumers to evaluate the proposed ratings systems in detail. This will also allow us to go beyond ratings preference, and afford us the opportunity to discuss the tire purchase process in more detail so we may begin to assess how well consumers understand what the ratings mean and how these ratings may impact purchase behaviors. This is an area of exploration that, based on public comments, was not covered in enough detail in the previous research effort. The discussion guide for the focus group research is included as Appendix C.

⁴ See Cal. Pub Res. Code § § 25770-25773; 2003 Cal. Legis. Serv. Ch. 645 (A.B. 844) (West)

⁵ Specifically, AB 844 required the State Energy Resources Conservation Board "to adopt, on or before July 1, 2007, and implement, no later than July 1, 2008, a replacement tire fuel efficiency program of statewide applicability for replacement tires for passenger cars and light-duty trucks, that is designed to ensure that replacement tires sold in the state are at least as energy efficient, on average, as the tires sold in the state as original equipment on those vehicles." Cal. Pub. Res. Code § 25772.

⁶ Publication # CEC-600-2009-010-SD (posted May 29, 2009), *available at* <http://www.energy.ca.gov/2009publications/CEC-600-2009-010/CEC-600-2009-010-SD.PDF> (last accessed July 8, 2010).

NHTSA will come out of the consumer testing with guidance as to how well consumers understand each proposed rating system, as well as hypotheses regarding the best method for communicating ratings to consumers. It is important to note that NHTSA is approaching this research without the assumption that the final deliverable for communicating ratings will be a paper label affixed to a tire. Public comments raised concerns that consumers will not see paper labels affixed to tires and through this research NHTSA will look to explore the proper channels through which consumers can compare tire ratings.

Insights gained from these consumer groups will also help to guide a follow-up quantitative study. The ratings and language that will be tested using a large-scale survey will be revised based on the findings from the qualitative research.

The following sections describe the justification for this proposed consumer focus group 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.

Under the EISA⁷, NHTSA must develop a national tire fuel efficiency program to educate consumers about the effect of tires on automobile fuel efficiency, safety and durability. To effectively develop this education program and fulfill its statutory requirements, NHTSA must first understand what consumers know about replacement tires, what motivates their purchase, what communication channels will be most effective, and how well they understand the new tire ratings.

Consumers in the U.S. spend about \$20 billion annually replacing the tires on their passenger vehicles.⁸ According to Transportation Energy Data Book, there are about 237.4 million registered passenger vehicles and light trucks in the U.S. consuming about 135 billion gallons of motor fuel annually.⁹ If adequately informed and interested, consumers can make more intelligent purchase decisions and their tire choices could significantly reduce the amount of fuel consumed annually if they look to reduce average rolling resistance when buying replacement tires.

On March 17, 2010, the Office of Management and Budget (OMB) concluded a review of NHTSA's Tire Fuel Efficiency Consumer Information Program final rule under Executive Order 12866. From this review and the public comments received in response to the final rule, it was concluded that NHTSA should conduct further consumer testing to assist in revising the label design with the goal of measuring consumers' understanding of the label and their likely behavior given the labels, rather than label preference. The research will also help NHTSA determine the proper scale that is clear and intelligible, and explore consumers' real-world interpretations of ratings.

Additionally, in a post review letter from Administrator of the Office of Information and Regulatory Affairs (OIRA) Cass R. Sunstein (Appendix D), it was suggested that NHTSA give greater weight to

⁷ Pub. L. 110-140, 121 Stat. 1492 (Dec. 18, 2007)

⁸ National Research Council Transportation Research Board, Special Report 286: Tires and Passenger Vehicle Fuel Economy, *available at* http://www.nap.edu/openbook.php?record_id=11620&page=1

⁹ Transportation Energy Data Book, Edition 28, Chapter 4, Tables 4-1 and 4-2, *available at* www-cta.ornl.gov/data (last accessed June 18, 2010).

scientifically valid experiments, rather than focus group testing. This proposal, in conjunction with NHTSA's proposed retailer interviews, is meant as a first step in the research process for this program. We believe qualitative testing will provide the depth necessary to guide future quantitative tests and together, these data collections will fulfill NHTSA's statutory requirements. Without qualitative testing, we will be unable to explore ratings in depth and any quantitative tests will be based on hypotheses developed from research that has been questioned by our constituents.

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 E.

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 provide critical information that will allow NHTSA to fulfill its role in developing a new replacement tire rating system and educating consumers about tire maintenance and replacement tires, as mandated by the EISA. Specifically, the data from this collection will be used to: 1) inform the rating system chosen to communicate a tire's fuel efficiency (rolling resistance), safety (wet traction), and durability (tread wear), and 2) guide the development of a consumer education program related to these issues.

The findings from this proposed research will assist NHTSA in ensuring that the ratings are comprehended by consumers and can help them in choosing more fuel-efficient tires. NHTSA will use the findings to help develop relevant and effective consumer education efforts to increase awareness and comprehension of tire issues.

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.

This 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 it will facilitate a deep conversation about replacement tires. The discussion will be helpful in gaining an understanding of consumer comprehension of ratings and their 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 in this phase. Group 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 all recent studies pertaining to the Tire Fuel Efficiency program. This new research plan has been developed to address concerns that arose during the public comment period in response to the final rule (49 CFR Part 575). Research has previously been conducted to help determine which ratings system consumers prefer and how consumers will learn more about replacement tires and tire maintenance, but the public comments indicated dissatisfaction with the methodology and the lack of focus on tire ratings comprehension. This new plan will explore consumer understanding and the potential impact ratings have on consumer purchase behavior.

Since the reason for this ICR submission is to address these concerns and conduct research that our constituents have faith in, NHTSA will have to repeat some lines of questioning. However, the research proposed in this plan will be conducted in a way that satisfies the methodological concerns and addresses any gaps that were present in previous studies.

NHTSA is mindful of the information that has already been collected from consumers 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 item does not apply to the consumer focus group plan.

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.

Without this research, NHTSA will be forced to select a ratings system and develop communications without properly assessing how well consumers understand the information being presented.

Without timely, accurate data, NHTSA risks releasing information and ratings that do not effectively drive consumers to consider more fuel-efficient tires. If NHTSA fails to clearly communicate the fuel efficiency, durability and safety of tires to help consumers make an informed decision, the agency would ultimately not fulfill its statutory obligations pursuant to the EISA.

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.

The below summary of comments received on this information collection request pertains to the entire qualitative research plan, including consumer focus groups and retailer interviews. This summary also includes comments received on a previous collection, the findings from which are included in the Final Rule (Appendix A).

September 2010 – January 2011

NHTSA has issued three requests for public comments related to this new collection of information on September 3, 2010¹⁰, September 27, 2010¹¹ and November 24, 2010. The final request for public comment in November was an extension of the previous notices.

NHTSA has received six responses: one unsigned, one each from LANXESS Corporation, Tire Industry Association (TIA), and Michelin North America and two from Rubber Manufacturers Association (RMA). LANXESS Corporation (a specialty chemicals company) and TIA indicated their support of this information collection request, noting the importance of providing consumers with related information, while the unsigned comment was opposed to this spending, but did not provide a reason why.

¹⁰ 75 Fed. Reg. 54217

¹¹ 75 Fed. Reg. 59319

RMA reiterated its position on several issues that it had raised in earlier comments. These comments, and the agency’s responses, are discussed in detail in the next section. RMA also commented on the content of the discussion guides included in this information collection request package. In response, we have revised the discussion guides to incorporate some of RMA’s suggestions regarding the content, format and order of the questions asked to participants.

RMA also recommended expanding the scope of the focus group testing. NHTSA is not expanding the number of focus groups, as recommended by RMA. RMA erroneously believed that the planned focus groups would have 12 participants and expressed concern about this size. NHTSA will be recruiting 12 participants, but only to ensure that each focus group contains the planned eight participants. Excess participants will be excused. NHTSA believes the current plan will achieve the objectives and will equip the agency with the necessary insights to guide quantitative testing.

March 2010

A copy of the Federal Register Notice (Vol. 75, No. 60. Pgs. 15894-15947), which includes the Final Rule for the Tire Fuel Efficiency Consumer Information Program, is provided as Appendix A. The notice was published on March 30, 2010. On March 19, 2010, NHTSA received a letter from Cass R. Sunstein, Administrator for the Office of Information and Regulatory Affairs, asking NHTSA to conduct further consumer testing after submitting the final rule to the Federal Register (Appendix D).

During the NPRM public comment period, NHTSA received a number of comments from constituents in the tire industry. These comments are included as Appendix F. Additionally, NHTSA held a public meeting on March 26, 2010 to provide a forum for these comments to be heard. The following tables outline the presenters and panel members present at this meeting.

Presenter	Organization	Role/Business Area
Roy Littlefield, Ph.D.	Tire Industry Association	Executive Vice President
Dan Zielinski	Rubber Manufacturers Association	Senior Vice President, Public Affairs
Walter H. Waddell, Ph.D.	ExxonMobil Chemical	Senior Research Associate
Ray Tuvell	California Energy Commission	Manager, Fuel-Efficient Tire Program
Fazilet Cinaraiip	European Tyre & Rubber Manufacturer’s Association	Secretary General

Panel Member	Agency	Role/Expertise
Mary Versailles	NHTSA	Project Lead/Rulemaking
Kil-Jae Hong	NHTSA OCCI	Marketing Specialist
Lisandra Garay-Vega, Ph.D.	USDOT/Volpe Center	Industrial Engineer
Kristin Kenausis	EPA	SmartWay Program, Office of Transportation and Air Quality
Chung-Tung Jordan Lin, Ph.D.	FDA	Team Leader, Consumer Studies

A summary of public comments was provided in the Final Rule (Appendix A). Below is a summary of public comments that impact the research we will be performing:

Consumer testing approach: The Tire Industry Association proposed a point-of-purchase survey to obtain immediate feedback on tire purchasing decisions. The Rubber Manufacturers Association presented a detailed perspective on quantitative methodology, which would include monadic cell testing for rating systems and ideas for testing ratings beyond ‘comprehension’. Both the RMA and the California Energy Commission (CEC) suggested including the current UTQG system in the consumer evaluation as a baseline measure.

These testing approaches have been considered and will be addressed in the ICR package for quantitative research for the tires fuel efficiency program that will follow this qualitative research. While we will not measure the current UTQG system as a means of gaining baseline metrics, this system will be discussed as it is the basis for wet traction ratings.

Consumer education program: Numerous commenters suggested various messages that NHTSA should be communicating to promote the success of the consumer education program. The CEC suggested analyzing successful consumer information programs, as well as analyzing the language used in current tire ads, to help craft messaging. Many commenters stated that much of the effectiveness of this rating system will depend on the success and reach of the consumer education program, which will educate consumers on the meaning of the new rating system and the importance of proper tire inflation and maintenance.

NHTSA will use this consumer research to explore messaging and potential communication channels for the consumer education program.

Rolling resistance rating metric: Tire Rack (an online tire retailer), Consumers Union (non-profit publisher of Consumer Reports magazine), and ExxonMobil expressed support for using RRF as the metric on which the agency should base the fuel efficiency rating. The tire manufacturers, a tire test equipment manufacturer, the European Commission, Japan Automobile Tyre Manufacturers Association (JATMA), the Natural Resources Defense Council (NRDC, an environmental group), and General Motors (GM) commented that RRC would be a better metric for a fuel efficiency rating than RRF. These commenters argued that basing a fuel efficiency rating on RRC would spread out ratings for tires available to a single consumer so that the consumer would be able to get a top rated tire.

In response to these comments, NHTSA will use the consumer research to explore perceptions of benefits for each system. While NHTSA expects that consumer comprehension of RRC and RRF will not be high enough to recommend one as superior, consumers will be afforded the chance to comment on whether or not they would like to compare tires across different sizes, which can help the agency in determining the best metric.

Safety: Advocates for Highway and Auto Safety (Advocates) supported the inclusion of tire safety information in the tire fuel efficiency consumer information program, and stated that the program should not promote cost savings at the expense of safety. JATMA supported the use of the current UTQGS wet traction grading test method as the basis for a safety rating for purposes of the tire fuel efficiency consumer information program. Tire Rack stated that NHTSA should base the safety rating on an average of the slide and peak coefficients of friction, the measurements of wet traction obtained via the traction test procedure. Consumers Union stated that the safety (wet traction) rating scale should be revised to

define a span that is most appropriate to the level of performance commonly found in current replacement tires while still leaving room for future improvement. RMA argued that EISA did not give NHTSA the authority to establish a new rating system for consumer information on tire safety. RMA contended that the derivation of the safety rating formula from the wet traction test measurements was not explained well in the NPRM and that they were unable to comment on it.

NHTSA will explore consumer comprehension of tire safety in terms of wet traction through this research. The agency will also use the research to determine the proper consumer-facing language (*i.e.*, safety vs. wet traction) and whether consumers are able to see the connection between the two. Wet traction ratings for this new system will still be based on UTQG traction scores and this research will explore whether consumers best understand the difference between two replacement tires if wet traction is rated using one to five stars, numerical scores ranging from zero to 100, grades A through E, or numerical scores ranging from one to 800.

Durability: Michelin North America commented that NHTSA should specify changes to the UTQGS tread wear procedure to yield more truly representative wear results. Michelin also commented that the durability (tread wear) rating scale should be adjusted because the ratings of some current replacement tires would far exceed the top rating on the scale. RMA argued that EISA did not give NHTSA the authority to establish a new rating system for consumer information on tire durability.

As with safety, NHTSA will use the research to explore consumer understanding of tread wear and its impact on tire performance, and determine the proper language to communicate this metric.

Overall rating: The tire manufacturers, MTS, Tire Rack, Advocates, and NRDC did not support an overall rating. Consumers Union, as well as other consumer and safety groups (Public Citizen et al.)¹² did support some form of an overall rating.

The consumer research will provide NHTSA the opportunity to explore consumer comprehension and desire for an overall rating. We will also explore the potential impact an overall rating may have on purchase behavior. NHTSA will discuss with consumers the idea of an overall rating that is computed based on an average score for rolling resistance, wet traction and tread wear. We will also explore the possibility of providing more weight to certain measures over others to arrive at this overall score.

Additionally, NHTSA will explore the potential use of a system much like EnergyStar or SmartWay that will brand the highest rated tires across manufacturers.

Label: NRDC, a private citizen, and Public Citizen et al. suggested the inclusion of a best-in-class (EnergyStar-type) endorsement for the most fuel efficient tires. To facilitate comparisons, Consumers Union and Tire Rack suggested the ratings show high and low demarcations reflecting the range of ratings for tires of the same size. Public Citizen et al. supported providing all the ratings on the same scale. Ford Motor Company (Ford) and Advocates suggested using the UTQGS scales for the wet traction

¹² Public Citizen, Center for Auto Safety, Consumer Federation of America, and Safe Climate Campaign submitted joint comments to the NPRM. See Docket No. NHTSA-2008-0121-0043.1. Throughout this summary of public comments, we will refer to these as Public Citizen et al. comments.

and tread wear ratings, as opposed to the proposed 0-100 scale. Advocates expressed support for the green-red color coding, while Michelin stated that the transfer of information to consumers cannot be wholly dependent upon color. Tire manufacturers supported a five category tire efficiency rating system, as opposed to the proposed 0-100 rating scale. RMA argued that EISA does not give NHTSA authority to provide consumer information on a tire's greenhouse gas (GHG) emissions. Numerous commenters submitted suggestions about terminology on the label, the ordering of the rating scales, the required size of the tire label, additional disclaimers to place on the label, and alternate graphic icons for the rating scales. RMA and the European Commission opposed the inclusion of tire manufacture date on the tire label, an issue on which NHTSA sought comment in the NPRM, but did not propose regulatory language. Public Citizen et al. suggested that the tire identification number (TIN), which NHTSA's safety standards require be molded onto the tire, be included on the paper label. Public Citizen et al., as well as the Tire Industry Association (TIA), expressed concern that a paper label may not provide consumers with information that would influence purchase decisions as consumers often do not see the tires until they are mounted.

Through the consumer research, NHTSA will test graphical treatment and channels for communicating. We cannot go into this research assuming that the outcome will be a paper label placed on the tire as many commenters have suggested most consumers never see the tires, or do not see enough tires to be able to compare ratings. The research will yield recommendations for these communications and address concerns with the proposed labels. NHTSA will also explore the potential of using a system much like EnergyStar or SmartWay that will brand the highest rated tires across manufacturers.

Information dissemination and reporting requirements

- **Tire manufacturer requirements:** Tire manufacturers expressed support of the interpolation of test values for purposes of data reporting. Other commenters generally opposed the interpolation of test values. RMA opposed the proposed data reporting requirements. NRDC supported requiring manufacturers to report rolling resistance data. The International Council on Clean Transportation (ICCT) agreed with the proposal that manufacturers should be required to report which tires are exempted, and the basis for the exemption. Similarly, Michelin expressed support for requiring tire manufacturers to report which tires qualify for the low volume exemption and are not labeled.
- **Tire retailer requirements:** Consumers Union suggested that NHTSA provide further guidance on how best to ensure that consumers can see the educational poster at the point of sale. RMA suggested that instead of requiring the proposed ratings graphic appear on a tire label, NHTSA should require that the rating information be made available to consumers at the point of sale. TIA commented that NHTSA underestimates the importance of dialogue between sales associates and consumers at the point of sale, and suggested that sales associates should be trained to communicate the information provided in the new rating system. Similarly, Public Citizen et al., Ford, the National Automobile Dealers Association (NADA) and ICCT encouraged the adoption of additional requirements beyond requiring the retailer keep the label on the tire until it is sold, reasoning that relatively few consumers see tires before they buy them as there are a limited number of tires on display in tire retailers. To address these comments, NHTSA is concurrently submitting an information collection request package to conduct exploratory interviews with tire retailers.

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 the 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 expect the honorarium to be a maximum of \$75 per participant for their time. 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 the focus group research, any personal information, such as name and telephone number will strictly be used for the purposes of recruitment or conducting interviews. Participants will be face-to-face with the moderator, and NHTSA team members will observe the groups, but privacy will be protected to the extent of the law. Prior to the start of the discussion, the moderator will assure participants that their responses are kept private to the fullest extent of the law and that they will not be personally 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.

For the focus group phase of this collection, NHTSA plans to conduct a total of 6 focus groups, each lasting approximately two hours. In each group, 8 participants will be seated. Therefore, a total of 48 people will participate in the group sessions. For recruiting of these participants, however, a total of 72 potential participants (12 per group) will be recruited via dialed telephone screening calls, which are estimated to take 10 minutes per response. (Based on experience, it is prudent to recruit up to 12 people per group in order to help ensure at least 8 will actually appear at the focus group facility at the appointed time). Thus, the total burden per person actually participating in the group discussions is estimated to be 130 minutes (10 minutes for the screening/recruiting telephone call plus 120 minutes in the focus group discussion session). Additionally, the total burden per person recruited (but not participating in the discussions) is 10 minutes.

Therefore, the total annual estimated burden imposed by this collection of information is approximately 108 hours.

Qualitative Phase	No. of Participants	Hours per Person	Total Participant Hours
Focus Group Recruiting	72	1/6 Hour (10 minutes)	12
Focus Groups in 3 Cities	48	2	96

The maximum total input cost, if all respondents were interviewed on the job, is estimated as follows:

$$\$15.95 \text{ per hour}^{13} \quad \times 108 \quad = \quad \$1,722.60$$

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 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 item A14).

Assuming respondents travel a maximum of 60 miles round-trip to and from the facility, the total maximum travel costs would be:

City	Maximum Participants Per Group	Maximum Total Participants	Maximum Miles Traveled	IRS Standard Mileage Rate¹⁴	Total Mileage Costs
Focus Groups in 3 Cities	12	72	60	\$0.51/mile	\$2,203.20

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.

¹³ From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2009 National Occupational Employment and Wage Estimates.

¹⁴ From Internal Revenue Services' 2011 Standard Mileage Rate for business miles driven.

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

The estimated 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.

Focus Groups - Facility Rental & Technology

Expense	Estimated Unit Cost	Total Units	Total Cost
Facility Rental	\$500 (per group)	6	\$3,000
Video Recordings	\$100 (per group)	6	\$600
Transcription	\$300 (per group)	6	\$1,800
Additional Facility Expenses (For incidentals like food, copies, shipping costs, etc.)	\$350 (per group)	6	\$2,100
Total Estimated Focus Group Facility Costs			\$7,500

Focus Groups - Recruitment and Incentives

City	Estimated Unit Cost	Participants Per Group	Total Groups	Total Participants	Total Costs
Recruitment	\$110	12	6	72	\$7,920
Incentives	\$75	12	6	72	\$5,400
Total Estimated Focus Group Recruitment and Incentive Costs					\$13,320

Staff Travel

For a 3-city focus group plan, we estimate the costs of staff travel to be approximately \$3,500 per person. This figure includes airfare, hotel room, ground transportation, and other incidental expenses.

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

Partner Hours

Staff time for our research partners is calculated using 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 finalization of research logistics, group moderating, data analysis and reporting, as well as meetings and conference calls with the NHTSA team.

Level	Labor Hour Rate	Estimated Hours	Total Costs
Vice President (a.k.a. Research Director)	210	80	\$16,800
Senior Account Executive (a.k.a. Project Manager)	125	110	\$13,750
Assistant Account Executive (a.k.a. Research Assistant)	100	125	\$12,500
Total Estimated Partner Staff Costs			\$43,050

The total estimated cost for this consumer focus group research program is **\$63,870**, 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 item is not applicable. This is a new information collection request that has been submitted to address public concerns with previous research completed for this initiative.

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

NHTSA expects to receive an interim report from our research partners within one week of 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 our research partners between focus groups to discuss key findings, evaluate the success of the groups and make any necessary adjustments to the discussion guide for clarity and understanding.

Below is the anticipated timeline for data collection. Though this schedule shows 5 weeks to finalize logistics, conduct the groups and report findings, we expect actual implementation and reporting for these focus groups to take approximately 4 weeks. Final dates of deliverables will ultimately be dependent on the date of OMB approval.

Date	Research Activity
Week 1	<ul style="list-style-type: none"> • Research program formally approved. • Focus group facilities contracted and recruitment begins.
Week 2	<ul style="list-style-type: none"> • Focus group recruitment continues.
Week 3	<ul style="list-style-type: none"> • Focus groups conducted • Retailer interview scheduling continues.
Week 4	<ul style="list-style-type: none"> • Initial focus group memo delivered.
Week 5	<ul style="list-style-type: none"> • Final qualitative report delivered.

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.

Section B

Recruitment Procedures

Focus Group Recruitment

Focus groups for the Tire Fuel Efficiency research program will be held utilizing the Fieldwork Network of focus group facilities. This company has 25 years experience in qualitative research and currently runs 17 focus group facilities in various cities. Fieldwork also has partners in other locations around the country that can be utilized depending on the location of these focus groups.

For focus group research, recruitment can be executed using one or a mix of the following methods:

- 1) A list of potential respondents is provided to the focus group facility. This method is generally used when participants must meet specific and unique criteria or when the group is to be made up of a specific population for which a list of members exists.
- 2) A database of potential local respondents is compiled by facilities over time. These are people who have agreed in advance to participate in focus groups, if they qualify. The focus group facility maintains this database and adheres to the Marketing Research Association's code of ethics on data collection in keeping personal information private.
- 3) An advertisement looking for participants can be included in the local newspaper, on a local website, or through some other channel to attract potential participants.

Since the first methodology does not apply to this program, focus group respondents for the Tire Fuel Efficiency research will be recruited using the latter methods.

Potential participants will be screened for various criteria and the sample for these discussion groups will be built in the following way:

- 1) First, participants must qualify as an adult over the age of 18.
- 2) Next, participants will be identified for inclusion in either the male or female focus group.
- 3) Next, participants will be asked if they or any of their family members work or have worked in the automotive, tire or marketing and market research industries. Those answering 'yes' will not qualify.
- 4) Next, participants must qualify as an owner or lessee of a vehicle.
- 5) Next, participants must qualify as having purchased a replacement tire in the last 6 months or as planning to purchase a replacement tire in the next 6 months.
- 6) Finally, participants must qualify as the primary or shared decision maker for tire purchases.

The screening criteria used for the focus groups are included as Appendix B of this package.

Focus groups will be homogenous by gender as past experience has demonstrated that in mixed groups that discuss vehicle-related purchases, women generally defer to male opinions rather than providing their own, well-thought-out perspectives. Therefore, we will seek out an even number of males and females in each city in order to hold one female group and one male group.

We will also look to have a generally even mix of recent tire purchasers and planned purchasers within each group. This will help us to receive perspective from a variety of tire-purchase mindsets; however, we do not intend to impose hard quotas for this.