

Supporting Statement for Tire Fuel Efficiency Consumer Information Program Retailer Interview Research

Submitted: May 16, 2011

Contents

| | |
|--|----|
| Section A..... | 3 |
| A. Justification..... | 3 |
| 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..... | 5 |
| 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..... | 6 |
| 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..... | 7 |
| 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..... | 7 |
| 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..... | 7 |
| 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..... | 8 |
| 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..... | 8 |
| 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..... | 8 |
| A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees..... | 13 |
| A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy..... | 13 |

| | |
|---|----|
| 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.. | 13 |
| A12. Provide estimates of the hour burden of the collection of information..... | 13 |
| A13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information..... | 14 |
| A14. Provide estimates of annualized costs to the Federal government..... | 14 |
| A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I..... | 15 |
| A16. For collections of information whose results will be published, outline plans for tabulation and publication..... | 15 |
| 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..... | 16 |
| A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I..... | 16 |
| Section B..... | 17 |
| Recruitment Procedures..... | 17 |

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 retailer interviews.

NHTSA is submitting this request to conduct interviews with tire retailers to help NHTSA develop a more comprehensive understanding of the tire purchase process and consumer needs throughout that process.

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

1) *Understand the tire purchase process from the retailer'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

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

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

purchases come at a time of emergency and that consumers do not research these purchases. Further research is needed, both with consumers and with retailers, to develop a 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.

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 interviews with tire retailers to help satisfy NHTSA's

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

statutory requirements to effectively provide the ratings and other information necessary to assist consumers in their replacement tire purchase decisions.

Conducting interviews with tire retailers will provide NHTSA with a more complete understanding of the tire purchase process and allow us to review potential ratings systems with the industry professionals who will be a key source of information for consumers. Retailers also have inside knowledge of communicating tire information to consumers and can provide a unique perspective on the language and channels we use in the consumer information program. NHTSA understands that to effectively reach consumers with tire information, tire retailers will be relied upon to accurately communicate the information to their customers. Therefore, part of these discussions will focus on retailer understanding of the potential ratings. Retailers are essentially partners in this education effort and will be vital in establishing the most effective methods of communication. The discussion guide for these interviews is included as Appendix B.

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.

NHTSA will come out of these interviews with hypotheses regarding the best method for communicating ratings to consumers. NHTSA will also use the results of this research to help refine a quantitative research approach and to begin developing a consumer information program that will help educate consumers about the new tire ratings and the impact of rolling resistance, wet traction, tread wear, and tire maintenance on fuel efficiency.

The following sections describe the justification for this proposed 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 EISA⁴, 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 develop a comprehensive understanding of 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. Coupling retailer research with consumer research will help the agency achieve this.

Consumers in the U.S. spend about \$20 billion annually replacing the tires on their passenger vehicles.⁵ 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.⁶ If

⁴ Pub. L. 110-140, 121 Stat. 1492 (Dec. 18, 2007)

⁵ 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

⁶ 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).

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 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 for both consumers and tire retailers, 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, it was suggested that NHTSA give greater weight to scientifically valid experiments, rather than focus group testing. A copy of the post-review letter is attached as Appendix C.

This proposal, in conjunction with NHTSA's proposed consumer focus groups, 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 D.

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 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, at retail locations. 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 and provide an opportunity to show retailers the proposed ratings. 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. 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). Consumer 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 phase of research is a new collection, as tire retailers were not included in previous programs. Still, 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.

NHTSA is proposing short interviews (25-30 minutes) with tire retailers. We believe this research will provide: 1) a complete understanding of the replacement tire purchase process; 2) a unique perspective on communicating tire issues to consumers; and, 3) a method of exploring the meaning of the new ratings with those who will be responsible for discussing the ratings with customers. Insights gained from these interviews will allow us to refine consumer-facing language and help us determine the feasibility of various communication channels (e.g., on-tire labels).

To reduce burden, these interviews will be conducted in-store at the convenience of the retailer. We will not engage retailers at any time that may interrupt their business.

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 comprehension of 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, 2010⁷, September 27, 2010⁸ 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.

⁷ 75 Fed. Reg. 54217

⁸ 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 C).

During the NPRM public comment period, NHTSA received a number of comments from constituents in the tire industry. These comments are included as Appendix E. 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 Cinaraiç | 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 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, scores ranging from zero to 100, grades A through E, or 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.)⁹ 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

⁹ 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.

scale. Ford Motor Company (Ford) and Advocates suggested using the UTQGS scales for the wet traction 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.

Additional notes from this public meeting can be found in this package as Appendix F.

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

Retailers will receive a \$75 honorarium each for their time. Each interview will last approximately 25-30 minutes total and this level of compensation is consistent with past one-on-one interviewing programs with field experts.

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

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, 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. Retailers will only be identified as tire retailers and their personal information will not be connected in any way to their responses through reporting. Any 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 retailer interviews, we plan on conducting 25-30 minute interviews. While the ultimate number of interviews conducted depends on the contacts NHTSA and its partners have that agree to participate, we anticipate conducting 25 interviews. For recruiting, we anticipate a short 5-minute call with potential participants in order to schedule the interview.

Therefore, the total annual estimated burden imposed by this collection of information is approximately 15 hours.

| Qualitative Phase | No. of Participants | Hours per Person | Total Participant Hours |
|--------------------------|----------------------------|-------------------------|--------------------------------|
| Retailer Recruiting | 30 | 1/12 Hour (5 minutes) | 2.5 |
| Retailer Interviews | 25 | ½ Hour (30 minutes) | 12.5 |

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

$$\text{\$15.95 per hour}^{10} \quad \times 15 \quad \text{\$239.25}$$

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

Interviews will be conducted at tire retail locations so there will be no travel costs for respondents. There will also be no record keeping or reporting costs to respondents.

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 participant incentives and staff travel.

Retailer Interview Recruitment & Incentives

| City | Estimated Unit Cost | Total Participants | Total Costs |
|---|---------------------|--------------------|----------------|
| Recruitment | \$125 | 30 | \$3,750 |
| Incentives | \$75 | 30 | \$2,250 |
| Incidentals | \$500 | 1 | \$500 |
| Total Estimated Retailer Recruitment and Incentive Costs | | | \$6,500 |

Staff Travel

All staff travel will be billed to this project at cost and utilize government travel guidelines. Actual costs may vary and are dependent on distance to retail locations.

NHTSA intends to use our research partner's extensive network of offices to accommodate retailer schedules and to reduce costs by eliminating any travel needs. Incidentals have been budgeted to account for any additional costs incurred (e.g., staff travel to local retailers), but will be billed at cost.

¹⁰ From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2009 National Occupational Employment and Wage Estimates.

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 screener and discussion guide finalization, group moderating, data analysis and reporting, as well as meetings and conference calls with the NHTSA team.

Note that the final report will include findings from retailer interviews as well as the focus group research, so reporting hours have been divided between the two proposed collections.

| Level | Labor Hour Rate | Estimated Hours | Total Costs |
|---|------------------------|------------------------|--------------------|
| Vice President (a.k.a. Research Director) | 210 | 15 | \$3,150 |
| Senior Account Executive (a.k.a. Project Manager) | 125 | 15 | \$1,875 |
| Assistant Account Executive (a.k.a. Research Assistant) | 100 | 20 | \$2,000 |
| Total Estimated Partner Staff Costs | | | \$7,025 |

The total estimated cost for this qualitative research is **\$13,525**, without travel. Final costs will be dependent on travel costs incurred 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.

The program change is a result of this new information collection request that has been submitted to address public concerns with previous research completed for this initiative. This collection will increase NHTSA's overall burden hour total by 15 hours.

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

NHTSA expects to receive a final qualitative report approximately two weeks after all focus groups and retailer interviews are completed. Additionally, NHTSA will plan to meet with our research partners during research fieldwork to discuss key findings, evaluate the success, 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. • Retailer interview scheduling begins. |
| Week 2 | <ul style="list-style-type: none"> • Retailer interview scheduling continues. • Retailer interviews conducted |
| Week 3 | <ul style="list-style-type: none"> • Retailer interview scheduling continues. • Retailer interviews conducted |
| Week 4 | <ul style="list-style-type: none"> • Reporting and analysis in progress. |
| 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.