

Supporting Statement for Information Collection Request
Part A

NHTSA Tire Fuel Efficiency
Consumer Information Program Survey Research Plan

Submitted: October 26, 2011

Contents

Part 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.....	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.....	8
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.....	8
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.....	9
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.....	9
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.....	9
A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.....	14
A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.....	14
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.....	14
A12. Provide estimates of the hour burden of the collection of information.....	15
A13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.....	15
A14. Provide estimates of annualized costs to the Federal government.....	16
A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.....	17
A16. For collections of information whose results will be published, outline plans for tabulation and publication.....	17
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.....	18
A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.....	18

Part 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 plan comprises three phases: 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 quantitative survey as the focus groups and retailer interviews are complete.

NHTSA is submitting this request to conduct quantitative research that will evaluate consumer understanding of the tire ratings and help guide the development of the consumer information program. This survey will explore consumers' current tire knowledge and the tire purchase process, as well as comprehension of tire ratings and the potential impact these ratings have on purchase behaviors.

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

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

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 getting old, while only 36% said it was because of an emergency (margin of error +/- 2.2%)². A number of groups who submitted comments to the NPRM believe that 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*

Before determining communication channels, NHTSA must first determine how well consumers understand the ratings. This includes evaluating the impact, if any, that rating designs (i.e., stars, grades, numbers, etc.) have on comprehension. Various graphical treatments will be tested in order to determine which, if any, stands out as superior.

3) *Evaluate channels for communication*

From our discussions with consumers and retailers in the qualitative portion of this research, we found that customers tend not to see the actual tire that is installed on their vehicle prior to installation. NHTSA is approaching this research with the assumption that a paper label affixed to a tire may not be the only communication channel for this effort.

Once NHTSA establishes which rating system is most comprehensible, the agency must 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 evaluated.

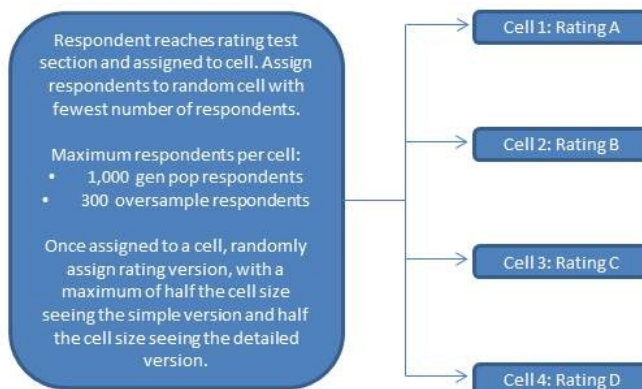
4) *Understand consumers' knowledge of tire performance*

This survey can be used to determine whether or not the target consumer understands the relationship between tires and a vehicle's fuel efficiency and safety. Results from this line of questioning can help guide relevant messaging for the consumer information program.

We recommend conducting a large scale online survey with 4,000 respondents. For the purposes of this study, it is sufficient that the sample be a convenience sample as long as it is diverse in terms of drivers' gender, age and state. Currently, NHTSA has four potential ratings systems, and will look to evaluate each rating in randomly assigned monadic cells among 1,000 respondents each, for a total sample of 4,000.

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

Monadic Design



Respondents will be screened based on the following criteria:

- Respondents must be 18 years or older.
- Respondents must currently possess a valid driver's license.
- Respondents must currently own or lease a vehicle.
- Respondents must be the primary or a shared decision maker for replacement tire purchases in their household.
- Respondents must NOT work in the automotive, tire or marketing/market research industries.

Once the general population portion of the survey is complete, we recommend conducting an oversample of up to 1,200 recent or intended tire purchasers. This will provide NHTSA with the ability to evaluate the ratings among consumers who are in the purchase mindset. This oversample will also follow a monadic design to ensure that 300 recent or planned tire purchasers have evaluated a particular rating between the general population survey fielding and the oversample responses. In order to qualify for this oversample, respondents must meet the following criteria:

- Respondents must be 18 years or older.
- Respondents must currently possess a valid driver's license.
- Respondents must currently own or lease a vehicle.
- Respondents must be the primary or a shared decision maker for replacement tire purchases in their household.
- Respondents must NOT work in the automotive, tire or marketing/market research industries.
- Respondents must either have purchased replacement tires in the last six months or plan to purchase replacement tires in the next six months.

This study plans to use two convenience samples: self-selected US drivers who have some responsibility for replacement tire purchase decisions and people who have either purchased replacement tires in the last six months or plan to purchase replacement tires in the next six months. The survey will be conducted online using survey panel members. Although this is a convenience sample, NHTSA is confident this study design will provide the quantitative estimates necessary to inform decisions about the tire fuel efficiency ratings and development of the consumer education program. Information regarding the sample is detailed in Part B of this supporting statement.

We recommend providing the survey in English only as the graphical treatments that will be evaluated are only available in one language. By providing the survey in additional languages, we risk having label information evaluated by consumers who do not understand the text being presented. A draft of this survey instrument is provided in this package as Appendix B.

It is important to note that NHTSA is approaching this research without the assumption that the only 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 determine the proper channels through which consumers can compare tire ratings.

NHTSA will come out of the consumer testing with data on how well consumers understand the new tire ratings and guidance as to which rating system the agency will choose as the best method for communicating ratings to consumers. NHTSA will also use the results of the research to begin developing a consumer information program that will help educate consumers about the impact of rolling resistance, traction, tread wear, and tire maintenance on fuel efficiency.

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.

Under the EISA³, 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.

³ Pub. L. 110-140, 121 Stat. 1492 (Dec. 18, 2007)

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 consumer's 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 C), it was suggested that NHTSA give greater weight to quantitative testing, rather than focus group testing.

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 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. 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 data collection will be completed using an online survey in order to facilitate the evaluation of graphical content in the rating evaluation section. By conducting this survey online, we will be able to implement technology through which respondents can interact directly with the on-screen content. When shown a tire rating, a respondent will be able to click directly on the image to indicate what information draws their attention and what causes confusion. As a result of this need to use an online survey methodology, this data collection will use two convenience samples: self-selected US drivers who have some responsibility for replacement tire purchase decisions and people who have either purchased replacement tires in the last six months or plan to purchase replacement tires in the next six months. Because the study is not a probability-based sample, there is no statistical basis to derive unbiased estimates representative of the target population, U.S. passenger vehicle drivers, or to estimate sampling error. However, NHTSA believes the benefits offered by an online survey, including the ability to measure differences between the evaluations of graphical treatments of the ratings, outweigh the disadvantage of potential respondent bias that rises from using a convenience sample. The purpose of the study is to examine differences between conditions, not to estimate population parameters; therefore, NHTSA believes that the study design will provide useful quantitative estimates of differences in consumer responses between various test conditions because the design randomly assigns respondents to conditions.

Details on the recruitment of respondents for this online survey are available in Section B of this information collection request.

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 survey research 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 inform consumers for their tire purchase decision. 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 issued three requests for public comments related to this new collection of information's qualitative phase on September 3, 2010⁴, September 27, 2010⁵ and November 24, 2010. The final request for public comment in November was an extension of the previous notices.

NHTSA 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.

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, the discussion guide was revised 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 did not expand 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 executed these groups by recruiting 12 participants, but only to ensure that each focus group contained the planned eight participants. Excess participants were excused.

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).

⁴ 75 Fed. Reg. 54217

⁵ 75 Fed. Reg. 59319

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 Cinaraip	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.

During the consumer focus groups, we found that familiarity with the UTQG system was low. We do not plan to measure the current UTQG system as a means of gaining baseline metrics; however, the system will be included in questions regarding sources of tire information.

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.

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 focus group discussions, there was little to no comprehension of RRC and RRF and little agreement as to whether or not it is useful to compare across tire sizes. In addition, there was no consensus among tire retailers on which to use.

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 UTQGS traction scores and this research will explore if the design of the scale impacts consumer understanding.

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.)⁶ did support some form of an overall rating.

In focus groups, consumers talked about the overall score as a ‘nice-to-have’ but were not satisfied with only an overall score. They were still interested in the individual ratings as a means of informing their decision. The overall score, if computed based on an average score for rolling resistance, wet traction and tread wear, provides consumers with additional assurance that a tire they are selecting is a ‘good’ tire.

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 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.

NHTSA will test graphical treatment and channels for communicating. We are not assuming that the outcome will be only 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.

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

⁶ 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.

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 an educational poster (if one is created) 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.

Respondents for this study will not be offered incentives provided directly by NHTSA. Research panel members are provided with non-monetary benefits, such as points to be used within the panel, access to forums and other panel-sponsored discussion opportunities, as a thank you for participating in various studies. This incentive management is included as one part of the cost per response figure noted in item A14. We would estimate the monetary equivalent of the points received for this particular study would be about 10-15% of the cost per response, or approximately \$.60 per response.

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

The introductory text for this study will read as follows:

Thank you for agreeing to participate in this online study. The survey will take about 15 minutes to complete. All responses are anonymous and will only be viewed in aggregate.

This study is being conducted on behalf of the National Highway Traffic Safety Administration (NHTSA). Please note that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a current valid OMB control number. The OMB control number for this study is TBD. This survey is voluntary. We will not collect any personal information that would allow anyone to identify you. Any information you do provide will be kept private to the fullest extent of the law.

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 online survey will take approximately 15 minutes for respondents to complete and will require 4,000 general population participants and up to an additional 1,200 respondents for the tire purchaser oversample. NHTSA plans to administer this study one time.

Table 1. Hour Burden Summary

	<u>Participants</u>	<u>Minutes</u>	<u>Hours</u>
Online Survey Completes	5,200	x 15	= 1,300

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

$$\text{\$16.27 per hour}^7 \quad \times \quad 1,300 \text{ interviewing hours} \quad = \quad \text{\$21,151}$$

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

There are no record keeping or reporting costs to respondents. Respondents who are members of an online panel of U.S. consumers will be contacted and asked to participate in the study. All responses are provided spontaneously. Each respondent only participates once in the data collection. Thus there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and startup costs, or (b) operation, maintenance, and purchase costs as a result of participating in the survey.

⁷ From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2010 National Occupational Employment and Wage Estimates, Last Modified April 2011

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

Direct Survey Costs

The following costs are associated with conducting an online survey as described in this justification document:

Table 2. Direct Costs

Item	Unit Rate	Units	Total
Cost per Response (General Population)	\$4	4,000	\$16,000
Cost per Response (Tire Purchaser Oversample)	\$10	1,200	\$12,000
Programming & Hosting (Including interactive graphic evaluations)	\$10,000	1	\$10,000
Data Processing (Including heat maps for each rating)	\$10,000	1	\$10,000
Total			\$48,000

Research 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 quantitative projects of a similar scope. These hours include time needed for survey preparation and execution, data analysis and reporting, as well as meetings and conference calls with the NHTSA team upon approval of this ICR package.

Table 3. Partner Hours

Level	Labor Hour Rate	Estimated Hours	Estimated Total Costs
Vice President	\$210	65	\$13,650
Senior Account Supervisor	\$150	10	\$1,500
Account Supervisor (Senior Project Manager)	\$155	105	\$16,275
Assistant Account Executive (Research Assistant)	\$100	150	\$15,000
Total Partner Staff Time			\$46,425

The total estimated cost for this quantitative research program is **\$94,425**. Final costs will be dependent on the actual number of respondents needed to reach oversample quotas and actual staff hours.

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.

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

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

Table 4. Research Timeline

ACTION	TARGET COMPLETION DATE	NOTES
OMB Review and Approve Quantitative ICR package	October 31, 2011	NHTSA has requested an emergency clearance from OMB. This target date assumes approval will be given shortly after the close of the 30-day public comment period.
Program online survey	November 7, 2011	Includes online survey programming, internal testing and survey pre-testing the survey.
Conduct online surveys	November 7 – December 2, 2011	Target 5,200 responses. Survey to be soft launched on November 7 to attain 5% of sample. Sample is reviewed prior to full survey launch. Note that additional time has been allotted for fielding due to the Thanksgiving holiday
Data processing & top-line analysis	December 2 – December 8, 2011	Data processing, including tabulation and open ended coding.
Interim Top-Line Report	December 9, 2011	Summary report based on initial analysis of top-line data.
Final Report	December 19, 2011	Final report on survey results, including recommendations for consumer education program.

Through data processing, we will use cross tabulations to analyze summary statistics and coded open-ended responses across cells. This will also provide the ability to analyze the data across demographic groups and compare recent or planned tire purchasers from both the initial sample and the oversample with those not currently in the tire purchase mindset.

As indicated above, a final report containing analysis of all the questions included in this survey as well as recommendations for the final rule will be available December of 2011 depending on the date of OMB clearance.

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.