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Supporting Statement

A. Justification

The National Highway Traffic Safety Administration (NHTSA) of the U.S. Department of Transportation (USDOT) is seeking approval from the Office of Management and Budget (OMB) to conduct a national telephone survey of pedestrian and bicyclist attitudes, knowledge, and behavior. This information collection supports the USDOT strategic goal of reducing non-occupant fatalities¹ by collecting information to identify any deficiencies in the public's knowledge of safe walking and bicycling practices, as well as by collecting data to identify other problems associated with these transportation modes that threaten the public welfare. It also supports goals within USDOT to promote pedestrian and bicycle transportation use and accessibility² by collecting data to compute measures of walking and bicycling, and data to identify factors encouraging or discouraging this behavior.

The proposed national telephone survey will be Random Digit Dial (RDD) and administered to 9,000 respondents age 16 and older, with an over-sample age 16 through 39. A dual frame sample will be used, with interviews conducted with respondents on both landline phones and cell phones. Interviewees will be randomly selected from all 50 States and the District of Columbia.

A.1. 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.

a. Circumstances making the collection necessary

NHTSA was established to reduce the number of deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. As part of this statutory mandate, NHTSA is authorized to conduct research as a foundation for the development of motor vehicle standards and traffic safety programs.

While not as much in the public eye as other traffic safety problems, motor vehicle crashes involving pedestrians and bicyclists exact a heavy toll. Pedestrians and bicyclists accounted for 14 percent of all traffic fatalities in 2009 and approximately 100,000 injuries. There are, however, simple things that people can do to reduce these risks, provided they are sufficiently aware and willing to take appropriate steps. For example, consider bicycle helmet use. A helmet is the single most effective way to prevent head injury resulting from a bicycle crash. Yet a 2008 NHTSA Fact Sheet notes that, despite the fact that nearly 70 percent of all fatal bicycle crashes involve head injuries, only about 20 to 25 percent of all bicyclists wear bicycle helmets.³ To

¹ See National Highway Traffic Safety Administration Fiscal Year 2012 Budget Overview, page 22, Rate of non-occupant fatalities per 100 M VMT.

² See, for example, FHWA Programs That Support Livability, www.fhwa.dot.gov/livability/programs/

³

effectively address the non-use problem, a clear picture is needed of bicyclists' knowledge of the use and effectiveness of helmets and the attitudes that prevent helmet use.

Another example is conspicuity. NHTSA figures indicate that almost 70 percent of pedestrian fatalities in 2009 occurred at night.⁴ This underscores the importance of the public being aware of simple methods to increase conspicuity, and NHTSA's need to know if people are actively applying these methods.

Efforts to enhance pedestrian and bicycling safety have included training, public information and education, legislation, enforcement, and engineering. However, there is an absence of national data to tell us whether these efforts need to be modified or whether new types of interventions are needed. More specifically, there is a lack of data concerning the public's exposure to risk as pedestrians and bicyclists, their awareness of correct pedestrian and bicyclist safety practices, their perceptions of the responsibilities of other roadway users, and their perceptions of risk. Without this information, safety professionals are left with inadequate tools for determining if there are critical deficits in knowledge or skills that should be addressed, or whether interventions are efficiently targeted to where they are most needed. This in turn poses severe constraints on the ability to meet the USDOT goals of reducing the number of injuries and fatalities occurring to bicyclists and pedestrians. NHTSA previously collected this data nationally in 2002. Up-to-date information is needed to provide guidance for current programs.

Besides reducing pedestrian/bicyclist injuries and fatalities, USDOT encourages increased use of walking and bicycling as modes of transportation. Yet there are limited data to measure progress. The currently proposed survey will utilize many of the questions administered in the 2002 NHTSA national pedestrian and bicyclist survey, allowing comparison of (self-reported) exposure measures separated by a 10 year interval. Factors affecting decisions to walk or bike will also be compared to identify any changes over time.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 403 (attached as Appendix A) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research on all phases of highway safety and traffic conditions; and to conduct training or education programs in cooperation with other Federal departments and agencies, States, private sector persons, highway safety personnel, and law enforcement personnel (See 23 U.S.C. 403(a)(1), 23 U.S.C. 403 (a)(5)).

³ NHTSA Traffic Safety Facts: Bicycle Helmet Use Laws. DOT HS 810 886W.
<http://www.nhtsa.gov/DOT/NHTSA/Communication%20&%20Consumer%20Information/Articles/Associated%20Files/810886.pdf>

⁴ NHTSA Traffic Safety Facts: Pedestrians. DOT HS 811 394
<http://www-nrd.nhtsa.dot.gov/Pubs/811394.pdf>

A.2. 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 data collected in the survey will be used to assist NHTSA in its ongoing responsibilities to: a) identify problems in pedestrian and bicyclist safety; b) assess current programmatic efforts in pedestrian and bicyclist safety; c) determine if changes are needed in intervention approaches; and d) improve programs to enhance pedestrian and bicyclist safety. The survey data will also be used to help guide policies encouraging these modes of transportation. Detailed information provided by the survey will direct the agency to information deficits to address within the population concerning key safety issues.

Besides using the information for its own program development and technical assistance activities, NHTSA will:

- Disseminate the information to State and local highway safety authorities, and to groups and other organizations concerned with bicyclist and pedestrian safety issues, who will use the information to develop, improve, and target their own programs and activities.
- Disseminate the information to the public health community, with whom NHTSA actively works to build communications and collaborative relationships. Certain segments of the survey instrument will be of particular interest to professionals in public health, such as items on bicycle helmet use.

The information will also be available to anyone in the public and private sectors through the NHTSA web site.

A.3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques or other information technology. Also describe any consideration of using information technology to reduce burden.

The data will be collected electronically through the use of Computer Assisted Telephone Interviewing (CATI). The CATI system allows a computer to perform a number of functions prone to error when done manually by interviewers, including:

- Providing correct question sequence;
- Automatically executing skip patterns based on prior answers to questions (which decreases overall interview time and consequently the burden on respondents);
- Recalling answers to prior questions and displaying the information in the text of later questions;
- Providing random rotation of specified questions or response categories (to avoid bias);
- Ensuring that questions cannot be skipped; and
- Rejecting invalid responses or data entries.

The CATI system lists questions and corresponding response categories automatically on the screen, eliminating the need for interviewers to track skip patterns and flip pages. Moreover, the interviewers enter responses directly from their keyboards, and the information is automatically recorded in the computer's memory.

CATI systems typically include safeguards to reduce interviewer error in direct key entry of survey responses. CATI also allows the computer to perform a number of critical assurance routines that are monitored by survey supervisors, including tracking average interview length, refusal rate, and termination rate by interviewer; and performing consistency checks for inappropriate combination of answers.

A.4. 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 has diverse information needs regarding public knowledge, attitudes, and behavior regarding walking and bicycling. No other survey collects national data covering the scope and detail contained in the proposed survey instrument. The Federal Highway Administration (FHWA) does collect detailed trip information through its National Household Travel Survey (NHTS). However, that survey does not focus on walking and bicycling behavior but rather covers all modes of transportation. Moreover, representatives from FHWA were heavily involved in the design of the 2002 NHTSA pedestrian and bicyclist survey instrument, indicating a need for additional information related to exposure. To the extent that questions on the proposed 2012 national pedestrian and bicyclist survey duplicate items on the NHTS, it is intentional. The items will not only allow comparisons from surveys involving different methodologies, but will provide a bridge between the two surveys allowing expanded exploration of context factors.

A few other organizations have conducted national surveys on a particular issue included in the proposed NHTSA pedestrian and bicyclist survey, such as the U.S. Consumer Product Safety Commission conducting a national study of bicycle helmet use. But these are a small number of isolated pieces of information, and do not offer the ability to assess their relationship to other attitudes, knowledge, and behavior important to NHTSA. Moreover, the studies that were found were quite dated, as is the previous NHTSA survey.

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

The collection of information involves randomly selected individuals, not small businesses.

A.6. 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.

If the survey were not implemented, NHTSA would lack current data on pedestrian and bicyclist behaviors, attitudes, and safety knowledge to inform pedestrian/bicyclist program development and support. NHTSA would also lack trend information to assess whether there have been significant changes over time. The end result would be that the agency would not have adequate information to determine how best to apply its resources within the current environment. There are no legal or technical obstacles to reducing burden. However, the 10-year interval between the NHTSA surveys has minimized the burden to the public from NHTSA collecting information critical to the pedestrian and bicyclist program areas.

A.7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth 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.

A.8. Provide a copy of the FEDERAL REGISTER document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

FEDERAL REGISTER NOTICE: A copy of the Federal Register Notice which notified the public of NHTSA's intent to conduct this information collection, and provided a 60-day comment period was published on June 13, 2011 (Vol. 76, No. 113, Pages 34290-34291). It is attached as Appendix B.

A copy of a second Federal Register Notice (Vol. 76, No. 250 Pages 82038-82039), which announced that this information collection request will be forwarded to OMB, was published December 29, 2011. It is attached as Appendix C.

No comments were entered into the NHTSA docket in response to the 60-day Federal Register Notice. However, the following comment was emailed to the listed NHTSA contact for information, Alan Block, following publication of the 30-day Notice in December.

Comment: I out of 2 americans is in poverty. and this agency wants to spend bludgeoned tax dollars on this worthless, unnecessary survey at this time of economic peril. it is time to shut down this agency, which seems to have no understanding of the awful conditions under which american citizens are living right now. more and more people are out of a job every week. and they are to be bludgeoned paying taxes to the feds so the feds can waste their tax dollars on this unnecessary survey.

there are endless surveys already done on this subject. there is

no need for spending this valuable tax dollars on this nonsense at this time. shut down this budget project to zero. americans want smaller govt. americans want cheaper, more productive govt. nhtsa shows no capability of understanding the american people. they live in a fat cat insulated bureaucratic world that doesn't understand what is going on in america. they have no clue.

Response: As noted earlier, it has been 10 years since NHTSA last conducted this survey, and comparable national data are not available elsewhere. NHTSA needs the information in order to track trends; identify if there are new problems that have arisen over the past decade; and determine if current programs need updating based on changes in behavior, attitudes, and awareness detected by the survey.

EXPERT CONSULTATION: This study was originally designed and administered in 2002. At that time, consultation about questionnaire content, interview procedures, and the sampling plan occurred during planning meetings with experts at NHTSA, the Research and Innovative Technology Administration (RITA), the Federal Highway Administration (FHWA), and the contracted survey firm. In updating the questionnaire for the 2012 administration of the survey, input was obtained from an Inter-Departmental Working Group in the Pedestrian/Bicyclist areas. Experts from FHWA then met with experts at NHTSA for further discussion of changes to the questionnaire.

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

Because of the cost structure of cell phone billing currently in the United States, there often may be a financial burden upon the respondent for an incoming research call – something that does not occur with a landline phone. The American Association For Public Opinion Research (AAPOR) Cell Phone Task Force Report recommends that, when appropriate, interviewers offer a form of remuneration to offset this cost to the respondent. This study will follow that recommendation by offering \$10 compensation to respondents reached on their cell phones to account for limited calling plans.

This study will also offer \$20 to 200 people to participate in a non-response follow-up survey (see Section B.3-e). These will be people who were selected to participate in the main survey, but never responded. They are needed in order to conduct a non-response bias analysis, and an incentive is necessary to encourage their participation because of the difficulty in obtaining information from them. The Contractor has found this amount to be effective in past non-response follow-up studies they have conducted.

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

In the survey's introduction, respondents are informed that participation is voluntary, and their answers will be kept private and will be used only for statistical purposes. These surveys do not collect identifying information such as names, addresses,

telephone numbers, or social security numbers. Upon completion of these surveys, it would be impossible for anyone to be identified based on his or her responses to the survey questions. Furthermore, the NHTSA contractor will separate the responses from the telephone numbers called.

As specified in Section A-9, the Contractor will be offering compensation to respondents in the cell phone sample and to the respondents participating in the non-response bias analysis. In those cases, the Contractor will need to collect name and address information in order to send the respondent the money. The information will only be used for that purpose, and will be separated from the survey responses.

A.11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The survey does not contain any questions related to matters that are commonly considered sensitive or private. The survey questions are directed at outside walking and biking activity.

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

Data collection will involve a pretest with 15 respondents and interviews with 9,000 randomly selected respondents during the main data collection effort. Each respondent will be administered the survey once.

NHTSA estimates that the pretest interviews will require an average of 20 minutes per interview or a total of 5 hours for the 15 respondents. Each respondent in the final survey sample would require an average of 20 minutes to complete the telephone interview or a total of 3,000 hours for the 9,000 respondents. The total estimated burden is shown in Table 1.

TABLE 1
ESTIMATED BURDEN HOURS

	Pretest	Main Data Collection	TOTAL
Respondents	15	9,000	9,015
Minutes	20	20	20
Burden Hours	5	3,000	3,005

Since respondents will be contacted at home, the survey will not be an actual cost to the respondents (i.e., they will be participating during non-salaried hours). However, the time they spend on the survey can still be looked at in terms of what it would have cost if the respondents had spent that amount of time on a task while on the job. Based on per capita income for the overall population in 2009 (Source: *Income, Poverty, and Health Insurance Coverage in the United States: 2009*, U.S. Census

Bureau, U.S. Department of Commerce, Current population reports P60-238, September 2010, page 13), the total respondent cost would be:

$$\text{\$12.75 per hour} \times 3,005 \text{ interviewing hours} = \text{\$38,314}$$

A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.

There are no record keeping or reporting costs to respondents. Respondents will be contacted randomly, and asked for their attitudes, knowledge, and behavior related to walking and bicycling. 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 start up costs, or (b) operation, maintenance, and purchase costs as a result of participating in the survey.

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

Total estimated cost to the government for conducting the survey is as follows:

Number of completed interviews	9,015
Total estimated cost of conducting survey	\\$884,677
Cost per completed interview	\\$ 98.13

This estimate is based on the total cost of the awarded survey contract divided by the specified number of completed pretest/survey interviews. Costs of the project will be concentrated within a one year period, making the annual cost to the government the full \\$884,677.

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

This is a new information collection. As such, it requires a program change to add the estimated 3,005 hours for the new information collection to existing burden.

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

Weighted frequencies will be computed for each of the questions in the survey. Cross-tabular analyses of the survey data by population subgroups and key analytical variables will also be conducted. To further explore and analyze the relationships in the data, factor analysis techniques will be employed to identify latent constructs in the data. That is, those characteristics that cannot be observed or measured directly, but can be measured by groups of questions. These are often concepts that are overarching or defined at a level that cannot be measured by individual questions. For instance, categories of pedestrians based on reported behaviors and attitudes can be developed. These factors add strength to the entire analysis since concepts that would otherwise be unidentified contribute to the predictive model. Identifying categories of bicyclists/pedestrians would assist NHTSA in interpreting the data. NHTSA did not

ask for factor analysis to be conducted for the 2002 NHTSA national pedestrian and bicyclist survey. However, for the reasons just given, NHTSA believes it would be valuable to include as exploratory post hoc analysis of the 2012 data.

Findings will be disseminated through internal briefings to NHTSA managers who must make strategic planning decisions regarding program activities and resources, as well as through printed technical reports distributed to traffic safety officials and other interested persons at the national, State and local levels. Those reports will be available to the general public on the NHTSA web site. The data will also be placed in the public domain, available through the NHTSA web site.

A.17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

NHTSA will display the expiration date for OMB approval.

A.18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of the OMB Form 83-I.

No exceptions to the certification are made.