

**Department of Transportation
Office of the Chief Information Officer**

**Justification for Nonmaterial/Nonsubstantive Change
for
OMB Control Number 2126-0011 ICR**

This is to request that the new annual costs in the currently approved Nonmaterial/Nonsubstantive change request (05/01/2012) be changed from \$1,122,520 to \$20,479,302 [\$7,425,333 previously approved costs + \$13,053,969 for year 4 and subsequent years annual costs = \$20,479,302]. The annual cost estimated for the “Commercial Driver’s License Testing and Commercial Learner’s Permit Standards final rule’s 4th and subsequent years which was accounted for in the Information Collection Supporting Statement that was approved on May 13, 2009 was an annual cost of \$13,053,969. Provided below is the justification and calculations for this cost. Since the initial 3-year implementation of the Commercial Driver’s License Testing and Commercial Learner’s Permit Standards final rule approved on August 3, 2011 is in the same time period, its initial cost of \$7,425,333 should be added to the Med Cert out years cost of \$13,053,969 for a total of \$20,479,302.

13. Estimates of Total Annual Costs to Respondents:

Proposed Annual Cost for Year 4 and Subsequent Years

FMCSA estimates the **total annual cost** to CDL holders and SDLAs to maintain their systems and to record information from the driver’s medical examiner’s certificate and provide training at **\$13,053,969** (\$2,419,200 + 2,622,600 + \$8,012,169= \$13,053,969). This is based on the following calculations:

1. Annual Cost of All CDL Holders Providing State With Initial Driver Qualification Certification

Assumptions:

- During the 4th and 5th year, all 11.52 million CDL holders must provide the State with one of four driver qualification certifications: non-excepted interstate, excepted interstate, non-excepted intrastate or excepted intrastate. The CDL holders will mail the certifications to the State.
- FMCSA estimates that it would cost \$.42 for a CDL holder to mail the driver qualification certification to the State...
- FMCSA estimates that the certifications will be mailed to the State over the full two years.

- The Agency estimates that it would cost \$.42 for the CDL holder to mail a driver qualification certification to the State.

Therefore

- FMCSA estimates the total annual cost to the CDL holder to provide the SDLA with the driver qualification certification as follows:

\$2,419,200 [11.52 million drivers/2 years x \$.42) = \$2,419,200].

2. Annual Cost of Interstate CDL Holder Providing the SDLA with an Original or Copy of the Medical Examiner's Certificate

Assumptions:

- FMCSA estimates that it would cost the interstate CDL holder \$.05 to make a copy of the medical examiner's certificate.
- The Agency estimates that it would cost \$.42 for the interstate CDL holder to mail a copy of the medical examiner's certificate to the State.
- FMCSA estimates that approximately 69% of the interstate CDL holders would renew their medical certification every 2 years.
- FMCSA estimates that approximately 31% of the interstate CDL holders would renew their medical certification every year as a condition of a medical variance (i.e., an exemption, Skill Performance Evaluation (SPE) certificate or pilot program) or their employer requires another examination.

Therefore,

The total number of renewal submittals would be 11.16 million (8.52 million x 1.31 = 11.16 million).

FMCSA estimates the total annual cost to the active interstate CDL holder to provide the SDLA with an original or a copy of the medical examiner's certificate as follows:

\$2,622,600 [11.16 million drivers/2 years x \$.47 (\$.05 + \$.42) = \$2,622,600].

3. Annual Cost of SDLA's Maintenance of Computer Hardware, Software, Databases and Training

FMCSA believes that additional costs to the SDLAs of \$157,101 (rounded) per jurisdiction per year would be associated with this information collection for an

estimated total **annual cost of \$8,012,169** (51 responses x \$157,101.35/jurisdiction = \$8,012,169) to maintain computer hardware, software, databases and training associated with this information collection as follows:

<i>Operational</i>	Total State Costs¹
Medical Examiner's Certificates Storage Equipment Maintenance	\$1,425,739
Office Space and Equipment Maintenance	\$350,619
Training	\$1,164,836
Letter Preparation and Mailing	\$3,959,555
<i>Information Technology</i>	
Data Storage and Computer Process	\$1,111,420
Total Annual Costs	\$8,012,169

Estimated Annual Cost to Respondents: \$20,479,302 [\$7,425,333 previously approved costs + \$13,053,969 for year 4 and subsequent years annual costs = \$20,479,302.

¹ These costs are based on a sample of nine States conducted by an FMCSA contractor, representing three tiers of size and different regions of the country.