Supporting Statement

49 CFR Parts 531 and 533 Passenger Car Average Fuel Economy Standards -- Model Years 2016-2025; Light Truck Average Fuel Economy Standards – Model Years 2016-2025; Production Plan Data OMB Control Number: 2127-0655

1. Explain the circumstances that make the collection of information necessary. Attach a copy of the appropriate statute or regulation mandating or authorizing collection of information.

In this collection of information, NHTSA is requesting updated future product plans from vehicle manufacturers, as well as production data through the recent past, including data about engines and transmissions for model year MY 2012 through MY 2025 passenger cars and light trucks and the assumptions underlying those plans.

NHTSA requests information for MYs 2012-2025 to aid NHTSA in developing a realistic forecast of the MY 2016-2025 vehicle market. Information regarding earlier model years may help the agency to better account for cumulative effects such as volume-and time-based reductions in costs, and also may help to reveal product mix and technology application trends during model years for which the agency is currently receiving actual corporate average fuel economy (CAFE) compliance data. Information regarding later model years helps the agency gain a better understanding of how manufacturers' plans through MY 2025 relate to their longerterm expectations regarding Energy Independence and Security Act requirements, market trends, and prospects for more advanced technologies.

NHTSA will also consider information from model years before and after MYs 2016-2025 when reviewing manufacturers' planned schedules for redesigning and freshening their products, in order to examine how manufacturers anticipate tying technology introduction to product design schedules. In addition, the agency is requesting information regarding manufacturers' estimates of the future vehicle population, and fuel economy improvements and incremental costs attributed to this notice.

2. <u>Indicate how, by whom, and for what purpose the information is used</u>. <u>Indicate actual</u> use of information received from the current collection.

The information is used for four major purposes:

- to provide the National Highway Traffic Safety Administration (NHTSA) with advance indication whether automotive manufacturers are complying with the applicable average fuel economy standards;
- to furnish NHTSA with the necessary information to prepare its annual update on the Automotive Fuel Economy Program;
- to aid NHTSA in responding to general requests concerning automotive fuel economy, which we routinely receive from Congress, other executive branches, federal agencies, and the public; and

- to supply NHTSA with detailed and current technical and economic information that will be used to evaluate possible future average fuel economy standards.
- 3. <u>Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.</u>

49 CFR Parts 531 and 533 do not impose any obstacles for automotive manufacturers to use improved information technology to forward this information to NHTSA. NHTSA encourages automotive manufacturers to submit these reports in tabular formats on computer disks using any NHTSA approved database structure. The automotive manufacturers largely use automation to calculate and compile the product plan data.

The agency does not receive 100 percent of this information electronically. Primarily, automotive manufacturers send the agency the information in written format (hard copy). Most manufacturers also supply the product plan information on CDs. We will call automotive manufacturers requesting the information be forwarded to the agency via e-mail or disk to encourage 100 percent automotive manufacturers' use of information technology applications for submitting fuel economy information.

4. <u>Describe efforts to identify duplication.</u> Show specifically why similar information cannot be used.

Some data required in these reports are also required by the Environmental Protection Agency (EPA), but the use of the information by NHTSA differs from EPA. NHTSA's rule permits automotive manufacturers to submit portions of their EPA submissions to this agency in which the same information submitted is listed in the semi-annual fuel economy reports.

5. <u>If the collection of information involves small business or other small entities, describe</u> the methods used to minimize burden.

None of the automotive manufacturers involved in this reporting requirement is a small business.

6. <u>Describe the consequences to the Federal program or policy activities if the information</u> collection were conducted less frequently.

Manufacturer product plans are requested each time that NHTSA initiates a rulemaking for light-duty fuel economy standards. These standards may be issued for a one to five year time frame, thus manufacturers would be expected to provide these reports every one to five years. Recent NHTSA rulemakings have typically ranged between three and five years. NHTSA generally requests products plans prior to issuing a notice of proposed rulemaking and prior to the issuance of a final rule. Since the gap between the notices is generally less than a year, manufacturers would be expected to provide two reports for each rulemaking cycle.

If the reports were required less frequently, NHTSA would not have current information to

evaluate whether automotive manufacturers comply with the applicable fuel economy standards. NHTSA would not have the necessary information to prepare its annual update on the automotive fuel economy program. NHTSA could not effectively response to inquiries received from Congress, other executive branches, federal agencies, and the public. NHTSA would not have sufficient information to evaluate possible future average fuel economy standards for passenger automobiles, especially light trucks, or to initiate other rulemaking activities, if applicable.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

The procedures specifying the automotive fuel economy report information are fully consistent with the guidelines set forth in 5 CFR 1320.6.

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, a description of a description of the agency's action in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

NHTSA published a notice and request for comments on the agency's intention to request OMB approval for a renewal of an information collection for Automotive Fuel Economy Reports (77 FR 35110; June 12, 2012). NHTSA received no comments relevant to the Paperwork Reduction Act Analysis.

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

No payment or gift will be provided to any respondent.

10. <u>Provide any assurance of confidentiality provided to respondents.</u>

49 CFR 537.12 <u>Confidential information</u> of the agency's regulation establishes the procedures by which NHTSA will consider claims that information submitted to the agency is confidential information. The regulation provides that if a respondent claim its reports contain confidential information the agency will consider that claim under this section.

11. <u>Provide additional justification for any question matters that are commonly considered private.</u>

There are no questions of a sensitive nature.

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

Reports are requested from each of the thirty automotive manufacturers. For each manufacturer who supplies product plan reports, NHTSA has made available a product plan template, which can be found at:

http://www.nhtsa.gov/Laws+&+Regulations/CAFE+-+Fuel+Economy/Current+and+past+product+plan+requests. The use of this template, although preferred by NHTSA, is optional and manufacturers have the option to provide this information to NHTSA in a format of their choice.

NHTSA currently has a clearance for 16,000 hours, based on reports being received from 22 manufacturers. NHTSA derived the burden hours from the estimated time it will take manufacturers to complete the template. Manufacturers have the option not to use this template, however, to develop an estimate of the time required to complete a product plan submission, NHTSA analyzed the data requested in the template and calculated the estimated time and effort to complete it.

Since the time of this clearance, an additional eight manufacturers are now filing separate compliance and CAFE reports for vehicles that are produced for sale in the U.S. Of these eight manufacturers, four are new to the U.S. market and four are manufacturers whose vehicle production was previously reported by another company because they were previously owned by another company. Because the latter four manufacturers are no longer included in the previous owners' reports, these companies are now reporting on their own under their new ownership structure.

Previously, one major manufacturer (General Motors) estimated their burden to be approximately 4,300 hours. The burden to other manufacturers was estimated using sales weights relative to General Motor's total sales (e.g., if a manufacturer produces 50% as many vehicles as General Motors, their burden is estimated to be 4,300*0.5 = 2150 hours). Therefore the burden to each manufacturer depends on the number of vehicles that manufacturer produces. The total estimated burden was 16,000 hours annually. Including reports from the eight additional manufacturers, most of which produce approximately 500 vehicles per year, results in an additional reporting burden of 500 hours. Adding that burden to the existing burden of 16,000, results in a total reporting burden of 16,500 hours.

Number of Affected Vehicle Manufacturers	30 Manufacturers
Annual Labor Hours for Each Manufacturer to Prepare	Variable
and Submit Required Information, whether in template	
format or not	
Total Annual Information Collection Burden	16,500 Hours

The information requested in the templates may change from request to request as new fuel economy technologies are implemented, which may increase the amount of information requested, and as older technologies are phased out, which may decrease the amount of information requested. Therefore, the time needed to complete the templates may vary for each product plan request. Although the reporting burden may not be precisely 16,500 hours for each

specific product plan request, NHTSA believes that, based on prior experience, that this burden is representative and accurate for the purposes of this clearance.

The monetized cost associated with this information collection is determined by multiplying the total labor hours by an appropriate labor rate. For this information collection, we believe vehicle manufacturers will use mechanical engineers to prepare and submit the data. Therefore, we are applying a labor rate of \$38.09 per hour which is the median national wage for mechanical engineers $^{[1]}$. Thus, the estimated monetized annual cost is 16,500 hours x \$38.09 per hour = \$628,485.

13. <u>Provide estimates of the total annual cost to the respondents or record keepers.</u>

There are no costs to the respondents or recordkeepers.

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

The annual cost to the Government to review the reports, analyze the data, and control and store the confidential information is \$30,000 (\$23,000 for labor cost and \$7,000 for administrative cost) per year for a nominal effort of about 583 professional and 362 administrative annual hours.

15. Explain the reason for any program changes or adjustments reported in Item 13 or 14 of the OMB Form 83-I.

Item 13 of the OMB Form 83-1, annual reporting and recordkeeping hour burden, is modified. The previous annual hours did not include eight new vehicle manufacturers that have either entered the market or were created due to mergers and acquisitions. The annual reporting burden increased from 16,000 to 16,500.

16. For collection of information whose results are planned to be published for statistical use.

This collection of information will not have the results published for statistical use.

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

Approval is not sought to display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19. "Certification for Paperwork Reduction Act Submissions," of OMB Form 8301.

No

exceptions to the certification statement are made.

19. <u>Collections of information employing statistical methods</u>.

This collection of information does not employ statistical methods.