

**SUPPORTING STATEMENT  
FOR  
OBTAINING VEHICLE INFORMATION  
FOR THE GENERAL PUBLIC**

**A. JUSTIFICATION**

In the “Request for public comment on proposed collection and consolidation of existing collection of information” notice published in the Federal Register (77 FR 11621) on February 27, 2012, the National Highway Traffic Safety Administration (NHTSA) proposed to include a new collection of information for which the agency is seeking OMB approval concerning the collection of recommendations from vehicle manufacturers regarding child restraint systems (CRSs) that fit in their individual vehicles. In that notice, NHTSA proposed combining the new provisions and existing collection for obtaining vehicle information for the general public (OMB Control Number 2127-0629). The proposed consolidation would minimize the burden on vehicle manufacturers by reducing the frequency of submission per year. The agency received comments from the public not only on the new provisions but also on the existing collection. Currently, the agency has not published its final decision on the new consumer information program, which relies on collecting information from vehicle manufacturers as to which CRSs fit in their individual vehicles. As a result, NHTSA is not able at this time to address comments from the public regarding the new provisions for the collection of information. Therefore, this document revises the previous version of the “Supporting Statement for Obtaining Vehicle Information for the General Public (OMB Control Number 2127-0629),” more specifically the responses to Statements 8 and 12, to address only comments received from the existing collection for obtaining vehicle safety information for the general public. When the agency announces its final decision on the new consumer information Vehicle-CRS Fit program, the agency plans to address comments from the public concerning the new provisions in a new submission.

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

NHTSA’s mission is to save lives, prevent injuries, and reduce motor vehicle crashes. Consumer information programs, such as the New Car Assessment Program (NCAP), are an important tool for improving vehicle safety through market forces.

Under the existing information collection for the NCAP program, NHTSA has been collecting vehicle and safety feature information from vehicle manufacturers and providing consumers with vehicle safety information such as frontal and side crash test results, rollover propensity, and the availability of a wide array of safety features provided on each vehicle model. Furthermore, the agency has been using this safety feature information when responding to consumer inquiries and analyzing rulemaking petitions that requested the agency to mandate certain safety features.

**2. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made of the information received from the current collection.**

This information is collected by the agency's New Car Assessment Program (NCAP) via electronic files that are sent to vehicle manufacturers for response. The information collected includes the following:

- Vehicle make, model, body style, certification type, projected sales volume, availability date, etc.,
- Crashworthiness features (i.e., adjustable upper belt anchorages, seat belt pretensioners, load limiters, etc.),
- Crash avoidance features (i.e., lane departure warning, forward collision warning, blind spot detection, crash imminent braking, dynamic brake support systems, etc.),
- Automatic crash notification systems,
- Event data recorders,
- Automatic door locks (ADL),
- Anti-theft devices,
- Static Stability Factor (SSF) rating information,
- Lower Anchors and Tethers for Children (LATCH) restraint system, and
- Side air bag information that would include whether the side air bags meet the requirements from the Technical Working Group (TWG) on Out-of-Position occupants.

**3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.**

The data is collected at the manufacturing sites where the vehicles are produced and electronically sent to NHTSA.

**4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.**

NHTSA is the only Federal agency responsible for ensuring motor vehicle safety and providing consumers with vehicle safety rating information. Two offices, the Office of Crashworthiness Standards (OCS) and the Office of Vehicle Safety Compliance (OVSC), coordinate their information collection efforts. The OVSC information collection is specific for compliance purposes. The OCS NCAP information is different from and supplements the OVSC data, and is necessary to provide consumers with vehicle safety rating information. The OCS and OVSC efforts are coordinated to ensure there is no duplication.

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

This collection of information does not include small businesses or other small entities. Vehicle information and CRS recommendations are provided by the vehicle manufacturers.

**6. Describe the consequences to the Federal program or policy activities if the collection is not collected or collected less frequently.**

The information is collected once a year for the “Purchasing With Safety In Mind: What to look for when buying a vehicle” and “Buying a Safer Car for Child Passengers – A Guide for Parents” brochures, other consumer publications, and to address consumer inquiries. The complete information is also available on the agency’s website, [www.safercar.gov](http://www.safercar.gov).

If this information is not collected annually, consumers will not have vehicle safety information they need to make educated vehicle purchases.

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

The procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

**8. Provide a copy of the Federal Register document soliciting comments on the collection of information, a summary of all public comments responding to the notice, and a description of the agency’s action in response to the comments. Describe the efforts to consult with persons outside the agency to obtain their views.**

On February 27, 2012, a request for public comment was published in the Federal Register (77 FR 11621) regarding the new collection of information for the new Vehicle-CRS Fit program and the consolidation of the new provisions with the existing OMB control number 2127-0629, “Vehicle Information for the General Public.” The agency received many comments on the Vehicle-CRS Fit collection of information but only one comment from the Alliance of Automobile Manufacturers concerning the existing vehicle safety information collection. The organization indicated that the vehicle information collection would involve resources not only from data entry staff but also from product managers for vehicle content validation, product engineers for technical information validation, and senior managers for review and final approval. After further consideration of the organization’s comment, the agency decided to revise its existing estimates to account for the additional resources. The labor rates for data entry clerks level III, product engineers level III, and program managers, which are now included in the agency’s estimates of the total annual burden cost, are based on median labor rates from [www.salary.com](http://www.salary.com). Detailed calculations of the estimates are provided in Statement 12.

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

NHTSA does not provide any payment or gift to respondents.

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

If a vehicle manufacturer claims that their report contains confidential business information, NHTSA considers that claim under 49 CFR Part 512, Confidential Business Information.

**11. Provide additional justification for any questions on matters that are commonly considered private.**

NHTSA and vehicle manufacturers consider reporting of the vehicle projected sales volume and availability dates as confidential information due to the competitive nature of the information. Other information provided is not of a sensitive nature or commonly considered private. Therefore, no additional justification is necessary.

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

There are approximately 21 vehicle manufacturers that sell motor vehicles in the United States with a Gross Vehicle Weight Rating of 10,000 pounds or less, that NHTSA request annually to respond to this information request. These 21 vehicle manufacturers produce approximately 400 vehicle models each year. Estimates are based on an expected 2 hours to prepare the request for each vehicle model.

A list of the estimated burden hours and cost is given below:

Number of respondents	21
Number of vehicle models	400
Number of hours per vehicle model	2
Total annual burden hours	800 = (2 hours/model x 400 models)

The revised cost associated with total annual burden hours is as follows:

Burden hours for data entry = 800 hours x 50 percent = 400 hours  
Burden hours for technical information validation = 800 hours x 40 percent = 320 hours  
Burden hours for technical content approval = 800 hours x 10 percent = 80 hours

Cost associated with data entry = 400 hours x \$20 per hour = \$8,000  
Cost associated with vehicle information validation = 320 hours x \$45 per hour = \$14,400  
Cost associated with vehicle information approval = 80 hours x \$60 per hour = \$4,800

Cost associated with total annual burden hours is \$27,200 = \$8,000 + \$14,400 + \$4,800

The Alliance of Automobile Manufacturers provided extensive comments on the agency's estimated total annual burden hours and the associated cost. As previously discussed, the agency plans to address comments regarding its estimates on the vehicle-CRS fit collection of information at a later time in a new submission when the agency announces its final decision on the new consumer information Vehicle-CRS Fit program.

**13. Provide estimates of the annual cost to the respondents or record keepers. (Do not include the cost of any hour burden shown in Question 12 or 14)**

There are no additional costs to respondents or record keepers concerning the vehicle safety information collection.

**14. Provide estimates of annual cost to the Federal Government.**

There are no additional costs incurred by the Federal Government as a result of this request for information.

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

The total annual burden cost projections associated with the burden hours are \$27,200. NHTSA estimated that there were approximately 445 vehicle models available for sale in the United States with a Gross Vehicle Weight Ratings (GVWR) of 10,000 pounds or less. Since then, the average number of vehicle models has decreased to 400.

Therefore, the total annual burden hours and cost for the collection of vehicle safety information have changed from 924 to 800 hours.

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

NHTSA will use this information on the agency's website ([www.safercar.gov](http://www.safercar.gov)), in the "Purchasing with Safety In Mind: What to look for when buying a new vehicle" and "Buying a Safer Car for Child Passengers" brochures and other consumer publications.

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

NHTSA is not seeking such approval.

**18. Explain each exception of the certification statements identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

No exceptions to the certification statement are made.