

Information Collection Request (ICR)  
Recall Product Registration Card Effectiveness Data Collection  
Supporting Statement

**A. Justification**

**1. *Information to be collected and circumstances that make the collection of information necessary***

Section 104(d) of Consumer Product Safety Improvement Act of 2008 (CPSIA) requires durable infant or toddler product manufacturers to provide product registration cards with each product sold. Section 104(d)(4) requires the Consumer Product Safety Commission (hereafter CPSC or “the commission”) to prepare a report of the effectiveness of product registration cards in regards to facilitating product recalls to be presented to the appropriate Congressional committees. Collected information will be used to explore issues surrounding the use of product registration cards in promoting product recalls.

**2. *Use and sharing of collected information***

The information requested in the data collection will be aggregated across manufacturers for the purpose of exploring current use of product registration cards. This data collection is not designed to permit industry-wide projections or extrapolations, but it will provide some general themes for future exploration. This information will be presented by CPSC to the appropriate Congressional committees as specified by section 104(d)(4) of the CPSIA.

**3. *Use of information technology (IT) in information collection***

This request for information will be distributed and collected through electronic as well as traditional mail.

**4. *Efforts to identify duplication***

Information being disclosed is manufacturer and product specific. The information provided by this collection is not available through any other agency, organization, or individual.

**5. *Impact on small businesses***

The data collection will be sent out to those infant or toddler product manufacturers who conducted recalls after the final rule concerning product registration cards was published in the Federal Register. There is no exception for small businesses, but the burden of the collection is minimal, and should have a negligible effect on small businesses.

**6. *Consequences to federal program or policy activities if collection is not conducted or is conducted less frequently***

Section 104(d) of the CPSIA requires the CPSC to prepare a report on the effectiveness of product registration cards in facilitating product recalls. This information collection is necessary to collect data to prepare that report.

**7. *Special circumstances requiring respondents to report information more often than quarterly or to prepare responses in fewer than 30 days***

There are no special circumstances that will require respondents to report more often than quarterly or in fewer than 30 days.

**8. *Consultation outside the agency***

A notice of the proposed collection published in the Federal Register on February 4, 2013 (78 FR 7761) discusses the information collection burden and invites public comment on the CPSC's estimates. The public comment period closed on April 5, 2013. CPSC received no comments.

A second notice was published in the Federal Register on May 13, 2013 (78 FR 27958).

**9. *Decision to provide payment or gift***

There is no payment or gift provided to respondents.

**10. *Assurance of confidentiality***

Manufacturers are assured that the CPSC will not share the respondent-specific information collected with the public, to the extent provided by law. The information collected will be aggregated to prepare a report on product registration cards.

**11. *Questions of a sensitive nature***

There are no questions of a sensitive nature.

**12. *Estimate of hour burden to respondents***

The average estimated time required for each manufacturer to complete the data collection is one hour. The data collection will be distributed to a maximum of 50 manufacturers, creating a maximum estimated burden across manufacturers of 50 hours.

We estimate that hourly compensation for the time required to complete the data collection is \$27.12 (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," December 2012, Table 9, total compensation for all sales and office workers in goods-producing private industries: <http://www.bls.gov/ncs/>). Therefore, the estimated annual cost associated with the proposed requirements is \$1,356 (\$27.12 per hour x 50 hours = \$1,356).

**13. *Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers***

There are no costs to respondents beyond those presented in Section A.12. There are no operating, maintenance, or capital costs associated with the collection.

**14. *Estimate of annualized costs to the federal government***

The estimated cost of the information collection to the federal government is approximately \$1,465.50, which includes 25 staff hours to examine and evaluate the information as needed for Compliance activities. This is based on a GS-12 level salaried employee. The average hourly wage rate for a mid-level salaried GS-12 employee in the Washington, DC metropolitan area (effective as of December 2012) is \$40.80 (GS-12, step 5). This represents 69.5 percent of total compensation (U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation," December 2012, Table 1, percentage of wages and salaries for all civilian management, professional, and related employees: <http://www.bls.gov/ncs/>). Adding an additional 30.5 percent for benefits brings average hourly compensation for a mid-level salaried GS-12 employee to \$58.70. Assuming that approximately 25 hours will be required, this results in an annual cost of \$1,465.50.

**15. *Program changes or adjustments***

This is a new information collection request.

**16. *Plans for tabulation and publication***

Results of the data collection will be synthesized and presented to the appropriate Congressional committees as specified in CPSIA Section 104(d). Once the survey is distributed, firms will have one month to respond. CPSC will spend approximately 2-3 months preparing the report and obtaining internal clearance for publication in the Congressional report.

**17. *Rationale for not displaying the expiration date for OMB approval***

Not applicable.

**18. *Exemption to Certification Statement***

Not applicable.

**B. *Collection of Information Employing Statistical Methods***

Not applicable.