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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 Principal Drivers of Vehicles with a Rear Seat Belt Reminder System (SBRS).

NHTSA proposes to collect information from this population to determine drivers' and car passengers' seat belt usage habits as well as the perceived effectiveness and consumer acceptance of rear SBRSs in order to support an analysis of the potential benefits of requiring a rear SBRS. The survey will collect basic demographic information, seat belt usage habits, acceptability of rear SBRSs, perceived effectiveness of rear SBRSs and perception of current SBRSs.

In June 2010, NHTSA published a Request for Comments on rear SBRSs in response to a petition we received from Public Citizen and Advocates for Highway and Auto Safety to amend FMVSS No. 208 to require automobile manufacturers to install a rear SBRS in their vehicles. We received several comments, but we did not receive enough information that would assist the agency in determining whether or not to grant the petition. This can be attributed to its limited availability and its recent introduction in U.S. vehicle models.

Currently the vehicles with rear SBRS conform to the EuroNCAP requirements which are minimal and these are the types of rear SBRSs we are considering requiring. They do not require occupant detection so the reminder consists of a visual display that indicates what rear seat belts are fastened. There is a short-term audible signal that is activated as well mainly to alert the driver of the display. The system also incorporates a change of status audible and visual signal when a passenger has unfastened their seat belt during a trip.

On July 6, 2012, President Obama signed into law P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21), a transportation reauthorization bill. The bill requires the agency to initiate a rulemaking for rear SBRSs within two years from the Act's date of enactment, and to issue a final rule, or if it cannot meet § 30111 then submit a report, within three years from the Act's date of enactment (§ 31503).

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.

Increasing seat belt use is one of the agency's highest priorities for carrying out our mission. Research has found that lap/shoulder seat belts, when used, reduce the risk of fatal injury to front-seat passenger car occupants by 45 percent and the risk of moderate to critical injury by 50 percent. For light-truck occupants, seat belts reduce the risk of fatal injury by 60 percent and moderate-to-critical injury by 65 percent. Seat belts are also effective in preventing total ejections; only 1 percent of the occupants reported to have been using restraints were totally ejected, compared with 32 percent of the unrestrained occupants.¹

Seat belt use in 2012 reached 86 percent.² However, a NHTSA survey released in 2010 found passengers in the rear seat of a vehicle buckle up 74 percent of the time.³ Getting every vehicle occupant to buckle up is critical to reducing the number of crash injuries and their severity. An unbelted rear seat passenger risks serious injury or death to him/herself and poses a potentially fatal threat to others in the event of a crash.

SBRs have been shown to increase the use of seat belts in the front seats of vehicles.⁴ However, there is an absence of national data about attitudes toward reminders for passengers and what kinds of passenger reminders are acceptable to drivers. Rear SBRs use audio and/or visual signals to inform drivers about the status of the rear seat belts and remind occupants to refasten their seat belt if the seat belt is unbuckled when the vehicle is in motion. Rear SBRs can potentially increase passenger belt use by informing drivers of nonuse, and encouraging passengers to buckle their seat belts and keep them on during a trip. Unlike enforcement, these in-vehicle reminders can provide continuous and immediate reaction to seat belt nonuse. Information is needed to assess the effectiveness of Rear SBRs and the alert characteristics of the system that encourage rear passengers to fasten their seat belts and keep them on during a trip.

The currently proposed survey will collect information on drivers' and car passengers' seat belt usage habits as well as the perceived effectiveness and consumer acceptance of rear SBRs in order to support an analysis of the potential benefits of requiring a rear SBR. The findings from this research would assist NHTSA in fulfilling the rulemaking requirements set forth in MAP-21 for rear SBRs.

An alternative survey method cannot be employed due to the limited number of vehicles in the U.S. fleet that have these systems and the findings we are seeking. For instance an observational survey would not be effective due to the limited number of vehicles and the inability to assess the rear passenger belt usage.

b. Statute authorizing the collection of information

49 U.S.C. 30111, 30112 and 30117 of the National Traffic and Motor Vehicle Safety Act of 1966 (Appendix A) specify that the Secretary of Transportation shall

¹ Traffic Safety Facts 2010 Data – Occupant Protection. DOT HS 811 619. May 2012.

² Seat Belt Use in 2012 – Overall Results. DOT HS 811 691. November 2012

³ Occupant Restraint Use in 2010. DOT HS 811 527. November 2011

⁴ Freedman, M., Levi, S., Zador, P., Lopdell, J., and Bergeron, E., “The effectiveness of enhanced seat belt reminder systems – Observational field data collection methodology and findings,” Report #: DOT HS 810 844, December 2007.

prescribe Federal Motor Vehicle Safety Standards (FMVSSs), and that each safety standard shall be practicable, meet the safety need for motor vehicle safety, and be stated in objective terms. The Secretary is authorized to issue, amend and revoke such rules and regulations as she/he deems necessary to carry out these sub-chapters.

NHTSA, in prescribing a FMVSS, is to consider available relevant motor vehicle safety data, consult with appropriate agencies, and obtain safety comments from the responsible agencies, States, safety commissions, public and other related parties. Further, the Act mandates that in issuing any FMVSS, the agency considers whether the standard is "reasonable, practicable and appropriate for the particular type of motor vehicle or item of motor vehicle equipment for which it is prescribed," and whether such standards will contribute to carrying out the purpose of the Act.

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 findings from this research would assist NHTSA in fulfilling the rulemaking requirements set forth in MAP-21 for rear SBRSs by allowing NHTSA to estimate the potential benefits of requiring a rear SBRS and by gaining a better understanding of consumer acceptance towards these systems as well as their preferences on the different types of warnings, features, etc. The agency will compare the reported belt usage of the group with a rear SBRS to the control group to assess the effect of rear SBRSs on rear passenger belt usage. The agency will use the findings on the acceptance towards these systems and signal preferences to help identify the optimal type of system and to assist in the development of performance requirements.

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.

The CATI system includes 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 conducted searches for studies on rear SBRSS in the U.S. to no avail. As mentioned NHTSA has published a request for comments on rear SBRSS and received a single source of data on the effectiveness of rear SBRSS (which was not conducted in the U.S.). This is the first time that NHTSA is collecting consumer information on rear SBRSS. The data we have on front SBRSS does not apply to rear SBRSS given the lack of occupant detection in rear seats and the reliance on the driver to encourage rear seat passengers to buckle up. Given that this is a relatively new vehicle technology here in the U.S. and is only available in a limited number of vehicle models, this would not be a redundant effort.

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 individuals selected from state vehicle registration lists and sales lists, 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 data on the perceived effectiveness of Rear SBRSS and would therefore be unable to determine whether a rule making requiring a Rear SBRSS in new vehicles sold in the United States is warranted. NHTSA would also lack information to measure drivers' preferences for the alert characteristics. The end result would be that the agency would not have adequate information to determine whether rear seat belt reminder system should be integrated in all new vehicles.

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 January 28, 2013 (Vol. 78, No. 18, Pages 5865-5866). It is attached as Appendix B. No comments were entered into the NHTSA docket in response to the 60-day Federal Register Notice.

A copy of a second Federal Register Notice (Vol. 78, No. 130 Page 40823), which announced that this information collection request will be forwarded to OMB, was published on July 8, 2013. It is attached as Appendix C. -

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

No payments or gifts will be given to respondents for this data collection effort.

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

In the survey's introduction respondents are informed that participation is voluntary and that the survey contractor will protect all personally identifiable information collected as part of the survey to the extent provided by law. The main sample will be drivers of vehicles equipped with a rear SBRS; a comparison group will be drivers who own similar vehicles as those in the main sample which do not have a rear SBRS. Those samples will be drawn from vehicle registration lists and sales lists. The lists will contain the respondent's name, address, and phone number. In order to maintain privacy, this information will be kept internally by the survey contractor solely for the purpose of conducting the survey. Upon completion of the survey, the contact information (name, address and phone number) will be stripped from the data file and it would be impossible for anyone to be identified based on his or her responses to the survey questions alone. NHTSA will not receive any of the contact information from the contractor upon receipt of the data.

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 towards seat belt use in

the vehicle as well as effectiveness, preference and acceptability questions regarding rear SBRs.

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

Data collection will involve interviews with 2,500 selected respondents from the state vehicle registration lists and sales lists during the field period. Each respondent will be administered the survey once.

NHTSA estimates that each respondent in the final survey sample would require an average of 16 minutes to complete the telephone interview or a total of 667 hours for the 2,500 respondents. The total estimated burden is shown in Table 1.

**TABLE 1
ESTIMATED BURDEN HOURS**

	Main Data Collection
Respondents	2,500
Minutes	16
Burden Hours	667

Since respondents will be contacted at home, they will not incur any costs as a result of their participation (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:

$$\text{\$16.57 per hour} \times 667 \text{ interviewing hours} = \text{\$11,052.19}$$

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 selected from the vehicle registration and sales lists, and asked questions regarding seat belt use and the effectiveness, preference and acceptability regarding rear SBRs. 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 startup 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	2,500
Total estimated cost of conducting survey	\$579,783.00
Cost per completed interview	\$231.91

This estimate is based on the total cost of the awarded survey contract divided by the specified number of completed survey interviews. Costs of the project will be concentrated within a one year period, making the annual cost to the government the full \$579,783.

A.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 667 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. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Frequencies will be computed for each of the questions in the survey. Cross-tabular analyses of the survey data by population subgroups, such as age and gender, 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 drivers based on reported preferences and acceptability 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 drivers would assist NHTSA in interpreting the 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. The findings would also be docketed in any rulemakings it is referenced in.

The schedule for data collection and publication is shown in Table 2. This schedule assumes OMB approval will be received no later than December 20, 2013.

Table 2. Data Collection Timeline

Task	Time Relative to OMB	Date
<i>OMB Approval</i>	--	12/20/2013
Perform Survey, Analyze data	2 months after OMB approval	2/20/2014
Draft Final Report	4 months after OMB approval	4/18/2014
Comments due from COTR to Contractor on Draft Final Report	2 weeks after receipt	5/2/2014
Final Report	6 months after OMB approval	6/20/2014

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.