

DISTRACTED DRIVING INTERCEPT SURVEY

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SECTION A

A) Justification

The National Highway Traffic Safety Administration (NHTSA) was established by the Highway Safety Act of 1970 (23 U.S.C. 101) to carry out a Congressional mandate to reduce the mounting number of deaths, injuries and economic losses resulting from motor vehicle crashes on our 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.

NHTSA must account for whether its initiatives are effective. NHTSA proposes to conduct information collections to evaluate the effectiveness of a distracted driving high-visibility enforcement (HVE) demonstration program. An essential part of this is comparing a baseline survey with a post-program survey to measure change in public awareness and attitudes associated with the traffic safety program activity. HVE uses media to increase public awareness of enforcement initiatives to crack down on particular unsafe driving behaviors, which in this case is text-messaging on an electronic device while driving.

NHTSA is requesting approval to conduct intercept surveys at driver licensing offices in Massachusetts and Connecticut before and after Distracted Driving Demonstration programs for the purpose of evaluating the demonstration programs. NHTSA is requesting approval for intercept surveys beginning winter of 2014 and concluding in the fall of 2014. NHTSA will administer the Distracted Driving Intercept Survey (DDIS), a one-page survey that drivers can complete while waiting at selected driver licensing offices.

This will be a community-level program and the HVE program will be conducted in one community per State. There will also be a control community in each State and the evaluation will be conducted in both the program and control communities. In Massachusetts, the program will be conducted in the Essex and Middlesex County area and the control will be in the Hampden County area. In Connecticut, the program will be conducted in the Fairfield County area and the control will be in the New London County area (please see Section B of this application for more detail on the participating communities).

The following sections describe the justification for these proposed data collections in more detail, along with the estimates of cost and burden.

A.1. Explain the circumstances that make the collection of information necessary. Identify any Legal or administrative requirements that necessitate the collection.

A.1.a) a. Circumstances making the collection necessary

Distracted driving is a transportation safety problem. According to NHTSA's National Center for Statistics and Analysis, 9% of fatal crashes were "distraction-affected" in 2010.¹ NHTSA's driver distraction research suggests that additional workload demands occur when texting while

¹ U.S. Department of Transportation, National Highway Traffic Safety Administration, National Center for Statistics and Analysis. (2012, September). *Distracted Driving 2010*. (DOT Publication No. DOT HS 811 650). Retrieved from <http://www-nrd.nhtsa.dot.gov/Pubs/811650.pdf>

driving, which may degrade driver performance.² In particular, driving distracted may lead to reduced eye scanning behavior, slower reaction time, degraded vehicle control, and lower detection of objects in peripheral vision, any of which may increase the likelihood of a crash (see distraction.gov).

Almost all Americans have cell phones and the use of electronic device-based technology is increasing in our culture. By 2010, CTIA, the Wireless Association®, estimated that the number of cellular phone subscribers had tripled over the past 10 years to 302 million – 96% of the U.S. population, continuing to increase to 331.6 million by 2011. According to CTIA, the number of active smartphones and PDAs increased 43% from 2010 (78.2 million) to 2011 (111.5 million). Half of American adults own a smartphone as of February 2012.³ Many users have more than one wireless device – one for work, another for personal use, or a variety of smartphones, tablets, and e-readers. The way Americans use their cell phones is rapidly changing. According to CTIA, from 2009 to 2011, the largest increase was in multiple media services that handle photos and other applications (up 51%), followed by text messages (up 47%).⁴

Many States have laws banning behaviors that are distracting for drivers. Traffic safety stakeholders pushed for laws to prevent distracted driving crashes. In response, States enacted legislation with various laws that ban drivers from using cellular phones while driving: 32 States and D.C. ban all cell phone use by novice drivers; 10 States, D.C., Guam, and the Virgin Islands prohibit all drivers from using handheld cell phones while driving; 39 States, D.C., Guam, and the Virgin Islands ban text messaging for all drivers; and an additional 5 states prohibit text messaging by novice drivers.⁵

This project is the next building block in our effort to help States enforce their driver distraction laws through HVE programs. Under the original data collection for OMB clearance 2127-0665, NHTSA evaluated a distracted driving HVE demonstration program in Hartford, Connecticut and Syracuse, New York in 2010 and 2011. While the primary focus of the program was enforcing and reducing hand-held cell phone use among drivers, the program scope also included texting or electronic device manipulation. Among many findings, the Connecticut and New York program revealed challenges with enforcing texting laws, such as difficulties observing the offence.⁶ This finding sparked a need to expand upon the Connecticut and New York program with a texting-focused distracted driving HVE program to troubleshoot the discovered challenges. For this texting-focused project, law enforcement experts from Connecticut and Massachusetts brainstormed innovative enforcement strategies to implement in the program,

² U.S. Department of Transportation, National Highway Traffic Safety Administration. (2010, April). *Overview of the national highway traffic safety administration's driver distraction plan*. (DOT Publication No. DOT HS 811 299). Retrieved from <http://images.thetruthaboutcars.com/2011/06/NHTSAdistracteddrivingplan.pdf>

³ Nielsen Wire, Smartphones Account for Half of all Mobile Phones, Dominate New Phone Purchases in the US, 2012, Retrieved from <http://www.nielsen.com/us/en/newswire/2012/smartphones-account-for-half-of-all-mobile-phones-dominate-new-phone-purchases-in-the-us.html>

⁴ CTIA, the Wireless Association. (2012), *CTIA-The Wireless Association Semi-Annual Survey Shows Significant Demand by Americans for Wireless Broadband*. Retrieved from http://www.ctia.org/media/press/body.cfm/prid/2171__

⁵ Governor's Highway Safety Association. (2012), *Cell Phones and Texting Laws, August 2012* Retrieved from http://www.ghsa.org/html/stateinfo/laws/cellphone_laws.html

⁶ Cosgrove, L., Chaudhary, N., Reagan, I. *Four High-Visibility Enforcement Demonstration Waves in Connecticut and New York Reduce Hand-Held Phone Use* (2011), National Highway Traffic Safety Administration. Retrieved from <http://ntl.bts.gov/lib/45000/45700/45729/811845.pdf>

such as utilizing a spotter to detect the violation, in either plainclothes or uniformed, and using roving patrol with marked and unmarked enforcement vehicles.

The reason NHTSA is asking to revise OMB clearance 2127-0665 with an additional data collection is because the texting-focused program will need to be evaluated to fully learn about the effectiveness of the innovative texting enforcement strategies. The program evaluation includes looking at both the program process and outcome, including analyzing the program enforcement and media activity, and measuring changes in driver awareness and behavior. A NHTSA contractor is under contract to conduct this evaluation, which includes measuring changes in observed electronic device use through roadside observations and measuring changes in public awareness through intercept awareness surveys conducted at local Department of Motor Vehicle (DMV) offices in the participating communities. Revision of OMB clearance 2127-0665 is required to conduct the public awareness survey.

The information obtained through the awareness survey would help NHTSA better understand if the employed HVE program was effective. This is because public awareness is a key component of the HVE model. When we measure change in awareness from before to after the program, it informs us of whether people were aware of the program and if they perceived an increased risk of getting a ticket for texting and driving. These are indicators of program success.

Statute authorizing the collection of information

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter. (See Appendix A)

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 purpose of this information collection is to provide critical information needed by NHTSA to demonstrate effective countermeasures that meet the Agency's mandate to improve highway traffic safety. The collected data will assist NHTSA in its ongoing responsibilities for: (a) reporting the effectiveness of program activities; (b) providing information to NHTSA's partners involved in improving public safety; and (c) providing sound scientific reports on NHTSA's activities to other public safety researchers.

The results will also be used by NHTSA to (a) assess the effectiveness of the mobilizations and determine where refinements or resource adjustments are needed; (b) aid in the development of strategic initiatives and future programs aimed at reducing traffic injuries and fatalities; (c) help address the problem of distracted driving and in formulate programs and recommendations; (d) to develop new programs and decrease the likelihood of distracted driving; and (e) to provide informational support to States, localities, and law enforcement agencies that will aid them in their efforts to reduce distracted driving-related crashes.

To help achieve all of these goals, NHTSA has awarded a contract to an evaluation firm with extensive experience in conducting intercept surveys and program evaluations. Data from the intercept surveys would be used to evaluate driver awareness, attitudes, and self-reported behaviors related to the texting-focused HVE program.

If approved, data from the intercept survey would be collected immediately before and after the demonstration program waves, in both the program and control communities. This would permit NHTSA to compare responses of those exposed to the program with the responses of those who were not exposed, to help assess whether the HVE program waves were successful at penetrating public awareness. In the future, the results from these surveys can be compared to findings in States that use alternative enforcement and media models (where applicable).

Results from the intercept survey analyses would add value to the overall program evaluation. NHTSA plans to employ a complementary, multi-pronged evaluation approach, consisting of intercept surveys (as described in detail in this justification), observational roadside surveys, earned media analysis, and an enforcement activity analysis. Measuring changes among all of these variables will offer a comprehensive assessment of HVE program effectiveness.

Here is a brief description of the other evaluation elements:

Before and after each program wave, motorists' electronic device use (i.e., texting) behavior will be observed among traffic in the program and control areas. Observations will be conducted at 15 sites per area (i.e., 15 in program area and 15 in control). The observation protocol will be based on NHTSA's National Occupant Protection Use Survey (NOPUS) protocol, adapted to increase sample size. Data elements from the observational surveys will include vehicle type, sex, estimated age (16-24, 25-59, 60+), whether the driver was holding a hand-held phone to her or his ear, manipulating a cell phone (other than by holding to one's ear), and if the driver had a hands-free headset (e.g., Bluetooth) in the visible ear.

NHTSA will also examine dedicated law enforcement hours and the number of citations issued per offense, per enforcement wave. Each State will submit baseline enforcement data for a period of time before the first wave of enforcement begins. This will provide a measure to determine relative enforcement activity for each wave.

In addition, NHTSA will analyze the earned media activity, such as (a) pre and post program press releases; (b) distribution of talking points to media outlets; (c) use of variable message boards; and (d) use of social media. This information will be collected through a dual effort between the States and NHTSA's Office of Communications and Consumer Information (OCCI).

The intercept surveys are an integral part of this evaluation as they provide information on change in public awareness from before to after the program. As such, the intercept surveys provide additional understanding of the program. All dependent measures work together and complement each other to provide an overall evaluation of the program.

Besides developing its own program and technical assistance activities, NHTSA will:

- Disseminate the information to State and local highway safety authorities, who will use it to develop, improve and target their own distracted driving enforcement programs and activities.
- Disseminate the information to citizen action groups and other organizations concerned with traffic safety issues, who will use it to develop, improve and target their own programs and activities.
- Make reports available to the public on the Department of Transportation's distraction website (www.distraction.gov), on NHTSA's driving safely website (www.nhtsa.dot.gov), and in NHTSA's behavioral research electronic library (<http://ntlsearch.bts.gov/repository/ntlc/nhtsa/index.shtm>). The Secretary of Transportation often issues press releases to accompany distracted driving reports.

The data collected under this project will help determine the effectiveness of distracted driving demonstration programs focused on texting. They will determine appropriate procedures for future countermeasure activity. The results will be disseminated to others for research and program development activities. If the surveys were not conducted, NHTSA program efforts would lack direction due to inadequate information upon which to base program decisions, severely limiting the Agency's effectiveness in reducing injuries and fatalities.

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.

This collection of information does not involve the use of technological collection techniques. NHTSA believes that simple pen and paper forms for data collectors are cost effective (because of not having to purchase the equipment to collect the data electronically), and provide a less formal and more comfortable environment for the participants. While the interviewers will not use electronic devices such as Personal Data Assistants, they will enter the collected data into an electronic database and NHTSA will receive 100 percent of the results of the data collection in electronic files.

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.

This proposed collection will build upon NHTSA's effort to reduce distracted driving by helping generate innovative and effective strategies to enforce texting laws. NHTSA conducted a distracted driving HVE program in 2010 and 2011 in Hartford, Connecticut and Syracuse, New York. The program mainly focused on enforcing and reducing hand-held phone use among drivers, but also included some efforts to enforce and reduce texting among drivers. The Connecticut and New York program revealed challenges with enforcing texting laws, which sparked a need to troubleshoot these challenges and test new methods for enforcing texting laws. While the current program is similar to the Connecticut and New York program because it is a distracted driving-related HVE program, it is unique because it solely focuses on texting and includes a greater magnitude and variety of strategies to enforce texting laws.

Because no data on the effectiveness of the innovative texting enforcement strategies exist, no other data source can be substituted. There is no possibility of duplicating information that is currently available.

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 (drivers) at DMV offices, not small businesses. Potential survey sites (DMVs) will be contacted in advance to secure permission to conduct the survey on their premises. Small business is not the target of the survey.

A.6) Describe the consequences to Federal Program or policy activities if the collection is not collected or collected less frequently.

As the national leader in traffic safety research, Congress has tasked NHTSA with providing evidence-based guidance to the States and stakeholders. Without evaluation efforts to measure how traffic safety programs work, it will be impossible to develop effective intervention strategies and adequately interpret the value of these programmatic efforts.

In evaluating demonstration project activities, the collection of information occurs at two points: before implementation of an HVE wave and after the conclusion of the wave. Researchers conduct the collections as an independent cross-section of the target communities. Each respondent participates in only one administration. Conducting the baseline and post-mobilization surveys in both the program and control areas is necessary to determine whether observed changes in driver attitudes and behaviors can be attributed to the program activities (as opposed to extraneous events or random chance). Without the administration of the pre- and post- surveys in both the program and control areas it would be impossible to provide evidence-based recommendations for future State and national interventions.

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 5CFR 1320.6.

A.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 actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

A.8.a) Federal Register Notice

NHTSA published a notice in the *Federal Register* with a 60-day public comment period to announce this proposed information collection on June 13, 2012, Volume 77, Number 114, pages 35473-35475 (See Appendix B-1). There were no comments on the Notice.

NHTSA published a notice in the *Federal Register* with a 30-day public comment period to announce forwarding of the information collection request to OMB for approval on June 18, 2013, Volume 78, Number 117, page 36632 (See Appendix B-2). There were no comments on the Notice.

A.8.b) Responses to the Federal Register Notice

No comments were submitted to Docket Number NHTSA-2012-0066 in response to the 60 Day Federal Register Notice. No comments were submitted to Docket Number NHTSA-2013-2009 in response to the 30 Day Federal Register Notice.

A.8.c) Expert Consultation

NHTSA staff adapted the survey instrument from the Distracted Driving Intercept Survey (DDIS) used to evaluate the 2010 and 2011 Hartford, Connecticut and Syracuse, New York distracted driving programs. The DDIS, in turn, was designed using key characteristics of NHTSA's 2009 *Click It or Ticket* survey, the 2002 *National Survey of Distracted and Drowsy Driving Attitudes and Behaviors*, and the 2007 *Motor Vehicle Occupant Safety Survey* (MVOSS). Prior to the survey development work, NHTSA's program, research, communications, and regional offices provided significant input on the topics and questions.

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

No payment or gifts will be offered to participants in the proposed survey. In addition, there are no direct out-of-pocket expenses associated with participation.

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

In the survey introduction, interviewers inform respondents that participation is voluntary and that their answers are anonymous. These surveys do not collect identifying information such as names, addresses, telephone numbers, or social security numbers. Upon completion of these surveys, it would be impossible to identify anyone based on his or her responses to the questions.

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 of a sensitive nature or related to matters that are commonly considered private.

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

The distracted driving intercept survey (DDIS) will require a total of 12,000 participants over 2 waves of data collection. NHTSA plans to conduct pre- and post-wave administrations for both the program and control areas in Connecticut and Massachusetts. NHTSA plans to administer a greater number of surveys for the very first and last measurements to increase statistical power (i.e., 1,000 surveys for pre wave 1 and post wave 2; 500 surveys for post wave 1 and pre wave 2). NHTSA plans to administer the same number of surveys in the program and control areas for each measurement period (please see Section B, Table 2 of this application for comprehensive sample size information).

	<u>Interviews</u>	<u>Minutes</u>	<u>Calculation</u>	<u>Hours</u>
DDIS	12,000	x 5	= 60,000 /60 minutes	= 1,000

In sum, NHTSA proposes to interview up to 12,000 participants over 2 program waves (6,000 participants per State) and estimates a burden of 1,000 total hours over a 10 month period.

The total number of estimated reporting burden hours on the general public would be 1,000 for the proposed survey. At \$22.01⁷ per hour, the total estimated cost associated with the burden hours is: \$22.01 x 1,000 hours for a total of \$22,010. Respondents would not incur any other reporting cost from the information collection.

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 asked for their attitudes, knowledge, and behavior regarding specific traffic safety topics pertaining to texting and driving. 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.

Based on the Distracted Driving Intercept Survey administered in Hartford, Connecticut and Syracuse, New York in 2010 and 2011, the estimated cost of data collection per participant is \$8.00. This includes the costs of collecting the data, as well as travel to the sites, data entry and data analysis. Total costs for the intercept surveys are \$96,000 (12,000 completed surveys x \$8.00 per survey).

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

This is a renewal of OMB Control Number 2127-0665. In this Information Collection Request (ICR) we are requesting clearance for the Distracted Driving Intercept Survey (DDIS), as it applies to the texting-focused HVE demonstration programs in Connecticut and Massachusetts. There are no program changes or adjustments to Item 13. There are adjustments to Item 14 for two reasons:

- The sample of respondents has increased by 12,000 participants from 22,200 to a total of 34,200 participants.
- The burden hours has increased by 1,000 hours from 1,850 to a total of 2,850 hours.
- We have experience from the Hartford and Syracuse community demonstration programs and estimate the cost of a completed survey at \$8.00 per survey (vs. \$6.00).

Given these adjustments the total cost of the intercept surveys conducted under OMB clearance 2127-0665 is estimated at \$273,600, a change from the previous request for clearance.

⁷ US Department of Labor, Bureau of Labor Statistics (2013). May 2012 National Occupational Employment and Wage Estimates. http://www.bls.gov/oes/current/oes_nat.htm

A.16) For collection of information whose results will be published, outline plans for tabulation and publication.

NHTSA expects to receive preliminary tabulations at the conclusion of each wave, an interim report half way through, and a final report at the end of the evaluation. The final report will cover all evaluation results and will be published upon receipt and completion of agency review, likely in spring of 2015.

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.