

**Department of Transportation
Office of the Chief Information Officer**

**SUPPORTING STATEMENT
Motorcoach Passenger Survey: Motorcoach Safety and Pre-Trip Safety Awareness and
Emergency Preparedness Information**

This is to request the Office of Management and Budget's (OMB) review and approval for a new information collection titled, "Motorcoach Passenger Survey: Motorcoach Safety and Pre-Trip Safety Awareness and Emergency Preparedness Information." Due to several recent fatal motorcoach crashes the Federal Motor Carrier Safety Administration (FMCSA) is currently working on several initiatives to improve motorcoach safety in the United States, including implementation of recommendations received from the National Transportation Safety Board (NTSB). All initiatives feed into the Department of Transportation's (DOT) update of its Motorcoach Safety Action Plan, released in December 2012. The goals and objectives of this survey are to assess the current levels of voluntary compliance by motorcoach operators and to obtain passenger opinions of the implementation of pre-trip safety awareness and emergency preparedness information. This information, along with its conclusions, will not serve as a national estimate, but will provide the Agency a general sense of voluntary compliance and suggestions for improvement. FMCSA will use the information to determine whether further evaluation is needed to support future program, policy, and regulatory initiatives. As appropriate, the information will be presented to NTSB and Congress, while also contributing to the general literature regarding practices for improving motorcoach safety in the United States.

Part A. Justification:

1. Circumstances that make collection of information necessary.

Of continuing concern for the FMCSA is whether or not passengers are receiving pre-trip safety-awareness and emergency preparedness information. This concern was elevated after several fatal motorcoach crashes, including a crash in New York City in March 2011 that claimed 15 lives and resulted in 18 injuries. The FMCSA needs to better understand the current level of motorcoach passenger safety awareness and emergency preparedness among motorcoach passengers and the motorcoach industry's level of voluntary adoption in providing this information.

In the late 1990s, the NTSB investigated several motorcoach crashes which revealed that passengers felt a general sense of panic, not knowing what to do or how to get out of a motorcoach in the case of an emergency. On February 26, 1999, NTSB issued recommendations to the Secretary of Transportation directed specifically at FMCSA concerning safety briefing materials for motorcoach operators and pre-trip safety information for passengers. The specific recommendations are provided below.

- H-99-007 – Provide guidance on the minimum information to be included in safety briefing materials for motorcoach operators.

- H-99-008 - Require motorcoach operators to provide passengers with pre-trip safety information.

To address the recommendations issued by NTSB, the FMCSA formed a work group that included representatives from the motorcoach industry, motorcoach manufacturers, insurance industry, safety consulting, industry, trade associations, State agencies, and other Federal regulatory agencies. Due to the large operational variances within the motorcoach industry, industry officials asserted that it would be impossible to develop a uniform safety awareness regulation flexible enough for industry-wide application. Therefore, the FMCSA and work group concluded it would be best to initially encourage the motorcoach industry to take voluntary action to improve pre-trip safety awareness and emergency preparedness for passengers. The group found that the development and promotion of best practices is an effective and realistic alternative to regulation to ensure motorcoach passengers receive such safety information. The group also concluded that if the initial approach was found to be ineffective and an unacceptable portion of the motorcoach industry did not voluntarily implement a safety-awareness program for passengers, FMCSA would consider whether regulatory action was needed to correct the problem.

On September 13, 2007, FMCSA issued a Federal Register Notice (72 FR 52424) detailing how it arrived at its conclusions and issuing a Basic Plan for Motorcoach Passenger Safety Awareness (<http://www.gpo.gov/fdsys/pkg/FR-2007-09-13/pdf/E7-18088.pdf>) that includes such topics as emergency exits, fire extinguishers, and slips and falls. It also detailed various methods that motorcoach companies could use to present the safety-awareness and emergency preparedness information.

The FMCSA and its safety partners have been monitoring crashes and complaints to ensure that motorcoach companies are presenting pre-trip safety-awareness and emergency preparedness information to their passengers. Currently, voluntary adoption levels are measured during FMCSA's National Passenger Carrier Strike Forces. Although the Strike Force data has shown increased levels, this data was solely based on input from the motorcoach companies and not actual passengers. FMCSA would like to verify that voluntary adoption continues to increase by surveying passengers and provide this data to Congress and NTSB to support this conclusion. This will help eliminate any self-reporting biases by the motorcoach companies; and determine if the pre-trip safety information is being provided and if it is effective.

Thus, the goals and objectives of this survey are to assess current levels of voluntary compliance and obtain motorcoach passenger opinions on the Basic Plan issued by FMCSA. Data for this project will be collected from a single incident survey of events in five distinct locations across the United States. Passengers will provide information regarding the receipt of information from trip-to-trip, its usefulness in addressing any concerns of motorcoach passengers, and recommendations for improvement in either the information itself and/or its method of delivery.

Statutory authority for regulating motorcoach passenger safety is derived from 49 U.S.C. Chapter 311, Subchapter III: Safety Regulation, codified at 49 U.S.C. 31131; and Chapter 313: Commercial Motor Vehicle Operators, codified at 49 U.S.C. 31136. 49 CFR Part 374 of the Federal Motor Carrier Safety Regulations (FMCSRs) contains the passenger carrier regulations.

In addition, this information collection request supports the DOT's Strategic Goal of Safety because the information helps the Agency improve the operations of companies and drivers transporting passengers on our Nation's roadways to further the Department's large truck and bus fatality rate reduction goal.

2. How, by whom, how frequently, and for what purpose is the information used.

This single incident survey is intended to help obtain a better understanding of motorcoach carriers' voluntary adoption and compliance levels with the FMCSA's Basic Plan for motorcoach passenger safety awareness and emergency preparedness, as well as the effectiveness of the means by which the information is being provided to passengers.

The information gathered will be used with other initiatives and efforts sponsored by the agency to develop recommendations for improving motorcoach safety in the United States. The results of the information collection will be summarized, through an aggregation of all responses from the population being surveyed – 1,600 motorcoach trips. These results will be made available to the public. This information, along with its conclusions, will be used to determine whether further evaluation is needed to support future program, policy, and regulatory initiatives; will be presented to NTSB and Congress; and will contribute to the general literature regarding practices for improving motorcoach safety in the United States.

This ICR contains the following information collection (IC) form:

- a. Form MCSA-5868, Motorcoach Passenger Survey: Pre-Trip Safety Awareness and Emergency Preparedness Information – To collect motorcoach passengers' responses during a total of five in-person survey events.

3. Extent of automated information collection.

This information collection will offer participating motorcoach passengers the option to respond during a total of five in-person surveys conducted at diverse locations. FMCSA selected the locations based on the United States three main motorcoach travel corridors on the East Coast, West Coast, and Central United States. Motorcoaches for the proposed survey will be identified by visiting locations in these corridors where motorcoach operators regularly conduct drop-offs. The passengers identified to participate in the survey will be selected by approaching them as they disembark the motorcoach, via in-person surveys by FMCSA-designated personnel trained for this work.

4. Efforts to identify duplication.

Beginning in 2008, the FMCSA began measuring compliance during its National Passenger Carrier Strike Forces, which have shown increased adoption levels each year. The 2010 adoption level was 76 percent, a significant rise from the 2008 baseline collection year level of 23 percent. Although the data has shown increased adoption levels, it is based solely on input from the motorcoach companies and not actual passengers. The FMCSA wants to verify that voluntary compliance continues to increase, and that the information provided is effective, through the collection and analysis of passenger survey data.

5. Efforts to minimize burden on small businesses.

The intended response population for this information collection is motorcoach passenger trips. Participation in the information collection is voluntary, only willing passengers will participate in this activity. Additionally, because the response time for the survey instrument is estimated at approximately 10 minutes maximum, with an average of 5 minutes for most respondents, this one-time data collection is not considered to be burdensome on small businesses. Every effort has been made in the design of the survey instrument to limit questions to those that are absolutely necessary.

6. Impact of less frequent collection of information.

Without the survey, FMCSA will be limited in its ability to assess the voluntary compliance levels with the FMCSA's 2007 Basic Plan (included in 72 FR 52424) for motorcoach companies to implement a safety-awareness and emergency preparedness program for passengers. FMCSA does not have any other way to measure the effectiveness of the means by which the information is being provided.

7. Special circumstances.

The information collection is essential to FMCSA's safety mission: to reduce crashes, injuries, and fatalities involving large trucks and buses. The agency plans to use the results to further inform Departmental and Agency efforts currently underway to improve passenger carrier safety.

8. Compliance with 5 CFR 1320.8.

The FMCSA consulted with passenger carrier companies and other stakeholders through a notice in the Federal Register (71 FR 50971) dated August 28, 2006, requesting comments on the Agency's proposed plan to implement NTSB recommendations H-99-007 and H-99-008. The comments received were addressed and published in the Federal Register notice (72 FR 52424) of September 13, 2007.

On October 18, 2011, FMCSA published an initial emergency request and 30-day notice to announce this new information collection would be submitted to OMB for approval (76 FR 64423). The agency received no comments in response to this initial notice.

On May 15, 2013, FMCSA published an updated notice with a 60-day comment period in the Federal Register requesting public comments on this information collection (78 FR 28699). The agency received no comments in response to this notice.

On April 18, 2014, FMCSA published a third and final notice with a 30-day comment period that announced this information collection was being submitted to OMB for approval (79 FR 21994).

9. Payment or gifts to respondents.

None.

10. Assurances of Confidentiality.

This collection will be kept private to the extent protected by law.

11. Justification for collection of sensitive information.

The survey instrument contains questions regarding motorcoach company and driver compliance with voluntary adoption guidelines in providing passengers pre-trip safety awareness and emergency preparedness information and passengers' receipt of such information. The FMCSA is interested in gathering this information only to assess the levels of voluntary compliance and obtain recommendations for improvement in the information itself and how to increase adoption levels; the questions are not intended to result in any enforcement action for noncompliance. No personally identifying information from motorcoach passengers will be collected. The survey does request specific information regarding the date of the trip, the name of the motorcoach company traveled on, and the fleet vehicle number.

12. Estimates of burden hours for information requested.

The information collection burden was estimated through a pilot test of the survey process and the survey instrument on June 26, 2013, at Union Station in Washington, DC. The test team attempted to collect information from 9 respondents over the course of the day, with 3 in the morning, 3 at midday, and 3 in the afternoon. Non-response was about 20 percent (2 out of the 9 passengers approached to take part in the pilot survey declined to participate). About 20 percent who provided a response failed to complete all of the survey questions, but all of them responded to the key question about receiving pre-trip safety information. On average, the respondents completed the survey in 5 minutes. The respondents arrived on trips from 6 different points of origin, and were transported by 6 different motorcoach companies. The survey team tracked overall arrival of motorcoaches at this location and, on average, there were 6 arrivals per hour throughout the day.

Based on the results of this limited test, the team was able to effectively execute the process, achieve an acceptable response rate, and recommend some minor changes to the survey instrument to improve the ease and accuracy of information collection. These changes have been

incorporated. The team also determined that respondents could easily complete the survey within the expected 10 minutes, with most completing the questions in half that time.

FMCSA expects that, given the nature of this survey, its brevity and the pilot test results, the motorcoach participation rate in the proposed survey will be at least 80 percent. Therefore, the survey team will contact passengers from 1,600 motorcoach trips as survey respondents in order to obtain at least 1,280 completed questionnaires/surveys.

The response burden is estimated at 10 minutes maximum per respondent to answer the survey questions, with an average of 5 minutes for most respondents. Because of the possibility that the passenger questioned may have been distracted or otherwise did not note the safety briefing being given, if the response is in the negative, one additional passenger will be interviewed very briefly to confirm that a pre-trip briefing did not occur for the trip. Accordingly, the maximum estimate of 10 minutes per interview is used in the calculation of the burden hours.

Table-1: MOTORCOACH PASSENGER SURVEY ANNUAL BURDEN HOUR CALCULATIONS

IC Number	Title	Form Number	Number of Respondents	Number of Responses	Burden Hours
1	Motorcoach Passenger Survey: Pre-Trip Safety Awareness and Emergency Preparedness Information	MCSA-5868	1,600	1,280	533
Total			1,600	1,280	214

Estimated Total Hours: 214 hours [(1,280 Motorcoach Passenger Trips x 10 minutes)/60 minutes to complete survey = 214 hours]

Estimated Number of Respondents: 1,600 respondents [1,600 Motorcoach Passenger Trips]

Estimated Number of Responses: 1,280 responses [(1,600 Motorcoach Passenger Trips x 1 single incident survey x 80% response rate) = 1,280].

13. Estimates of total annual costs to respondents.

None except reported in Item 12 above.

14. Estimate of cost to the Federal government.

The FMCSA survey team consists of 3 teams of 2 Federal employees each for a total of 6 Federal employees. The surveys will be conducted at 5 locations. Four locations require travel and 1 location does not. The total Federal government budget for this information collection is estimated at \$110,473 and is itemized as follows:

Table -2: COST TO FEDERAL GOVERNMENT

Tasks	Total costs, by task
Federal Travel to Survey Event Sites	\$42,191
Federal Salaries for Conduction of Survey Events	\$68,282
Total costs, all tasks	\$110,473

The costs for each task are broken out in tables 2a and 2b.

Table-2a: Federal Travel to Survey Event Sites: \$42,191

The total cost for each category is for 6 employees collectively. All costs have been calculated using the GSA per diem rates for the specified locations found at <http://www.gsa.gov/portal/category/100120>. The number of days listed includes 2 travel days. MI&E is calculated at 75% on travel days and only 1 extra day of lodging is added. Flight/mileage costs were determined using GovTrip. Train, subway and taxi costs were obtained from the location’s public transit website. Costs are rounded to the nearest dollar.

Location (5)	# Of Teams/ Days	Lodging	MI&E	Airfare/ Train /Mileage	Car Rental/ Subway/ Taxi	Tax (10%)	Total Costs Per Location
Atlantic City, NJ	3/3	\$1,128	\$990	\$607	\$120	10% of \$2,845= \$285	\$3,130
NYC, NY	3/8	\$12,768	\$3,195	\$2,028	\$174	10% of \$18,165= \$1,817	\$19,982
San Diego, CA	3/3	\$1,704	\$1,065	\$5,208	\$200	10% of \$8,177= \$818	\$8,995
Chicago, IL	3/5	\$4,608	\$1,917	\$2,500	\$120	10% of \$9,145= \$915	\$10,060
Washington, D.C.	3/2	\$0	\$0	\$0	\$24	10% of \$0= \$0	\$24
Total, Per Category	3/21	\$20,208	\$7,167	\$10,343	\$638	\$3,835	\$42,191

Table-2b: Federal Salaries for Conduction of Survey Events: \$68,282

The total cost for each grade is calculated using OPM’s 2015 General Schedule Locality Pay Tables (See <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/DCB.pdf>). All employees participating in the survey receive Washington, D.C. locality pay. Salary estimates are set at the Step 5 level for each grade. Estimates are rounded to the nearest dollar.

GS-Scale	Employees	Days	Hours per Day	Cost per Grade, per Location	Total Salary Costs per Grade
GS-15, Step 5 (\$143,079,\$68.56 hour)	2	21	9	\$12,958	\$25,916
GS-14, Step 5 (\$121,635,\$58.28 hour)	3	21	9	\$11,015	\$33,045
GS-13, Step 5 (\$102,932,\$49.32 hour)	1	21	9	\$9,321	\$9,321
Overall Salary Cost					\$68,282

15. Explanation of program changes or adjustments.

The program change increase of 214 burden hours is due to a new information collection.

16. Publication of results of data collection.

Survey data will be quantified using standard statistical methods that flow from the straightforward design of the survey. The results will be aggregated. Survey results will be available to the public at both the DOT’s and the FMCSA’s web sites respectively at www.dot.gov and www.fmcsa.dot.gov.

17. Approval for not displaying the expiration date of OMB Approval.

FMCSA is not seeking an exemption from displaying the expiration date on the information collection questionnaires.

18. Exceptions to certification statement.

None