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NHTSA 2009 Distracted Driving Survey Project 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 distracted driving attitudes, knowledge, and behavior. This information collection supports the U.S. DOT strategic goal of reducing fatalities¹ by collecting information to identify any deficiencies in the public's knowledge of safe driving practices, as well as by collecting data to identify other problems associated with distracted driving that threaten the public welfare. The National Survey on Distracted Driving Attitudes and Behavior (NSDDAB) has been conducted twice previously in 2010 and 2012. This ICR requests a revision to allow for a change in sample methodology and several question additions/revisions to reflect newer technology trends. The original OMB submission - NHTSA 2009 Distracted Driving Survey Project (ICR Reference No: 200911-2127-001 – Conclusion Date 2/2/2010) included both telephone survey and intercept survey components. The intercept survey was granted a revision under ICR Reference No: 201303-2127-006 (Conclusion Date 7/12/2013). An additional intercept survey was granted revision under ICR Reference No: 201308-2127-006 (Conclusion Date 3/12/2014). This ICR seeks approval for the original national telephone survey.

The proposed national telephone survey will be Random Digit Dial (RDD) and administered to 6,000 respondents age 16 and older, with an over-sample of age 16 through 34. A dual frame sample will be used, with interviews conducted with respondents on both landline phones and cell phones. Interviewees will be randomly selected from all 50 States and the District of Columbia. The survey will be conducted in 2014 and, given funding availability, again in 2016.

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.

¹ See National Highway Traffic Safety Administration Fiscal Year 2014 Budget Overview, page 25, Rate of non-occupant fatalities per 100 M VMT. Retrieved from <http://www.nhtsa.gov/Laws+&+Regulations/NHTSA+Budget+Information>

Driving while distracted increases the likelihood of a crash, and recent well publicized events have brought this unsafe driving behavior to the forefront of the public eye. Cell phone subscriptions have grown exponentially from 1988 through 2012. The most recent data suggest that about 89 percent of all American households have a cell phone.² For many, it is the only kind of telephone they possess. Cellular phone use is ubiquitous, and in the most recent NSDDAB (2012) 2 in 5 drivers (39.6%) reported that they make or accept phone calls while driving at least some of the time.³ The popularity of text messaging is increasing, and videotaped footage of crashes in which drivers were texting immediately prior to the crash have circulated widely on television. The emergence of other portable technologies such as MP3 players and GPS systems introduce more opportunity for drivers to attend to something other than the roadway environment.

Quantifying the effects of distracted driving on traffic crashes is problematic. Many police accident reports do not have a section for the responding officer to document whether or not distraction was a crash factor. Drivers who used a mobile device just before a crash may be reluctant to admit to device use for fear of penalties. Finally, the reports are post-hoc because officers arrive at the crash scene after the crash has occurred. These conditions lead to underreporting of distracted driving crashes.

Despite the difficulties of measuring the absolute effect of distraction on traffic crashes, there is much research about the nature of distracted driving. One research approach uses test tracks or simulators to compare driving while engaged in various distracting tasks to driving without a secondary task. These controlled studies frequently used cellular phone conversations as the distracting task. Horrey and Wickens (2006)⁴ completed a meta-analysis of studies that measured the effects of cell phone use on driving performance. Twenty three experiments were included in the analysis, and the authors found that, across all studies, reactions times were consistently slower when using a cell phone relative to normal driving. The authors report that hands-free phones did not reduce this decrement. This finding underscores the risks associated from cognitive distraction.

A second approach to studying distracted driving uses sophisticated instrumentation to observe everyday driving in naturalistic settings. The 100 car study recorded data for a 1 year period during which drivers of the vehicles had a number of crashes and near-crashes. Klauer et al. (2006)⁵ computed the odds-ratio for various types of driver distraction and reported that moderately complex secondary tasks, defined as requiring at most two glances away from the road or two button presses, and complex secondary tasks, defined as requiring three or more glances or button presses,

² Blumberg, S.J. & Luke, J.V. *Wireless substitution: Early release of estimates from the National Health Interview Survey, July – December 2012*. Retrieved from Centers for Disease Control and Prevention, National Center for Health Statistics website: <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201306.pdf>

³ Schroeder, P., Meyers, M., & Kostyniuk, L. (2013, April). National survey on distracted driving attitudes and behaviors – 2012 (Report No. DOT HS 811 729). Washington, DC: National Highway Traffic Safety Administration.

⁴ Horrey, W.J., & Wickens, C.D. (2006). Examining the impact of cell phone conversations on driving using meta-analytic techniques. *Human Factors*, 48, 196-205.

⁵ Klauer, S.G., Dingus, T.A., Neale, V.L., Sudweeks, J.D., & Ramsey, D.J. (2006). The impact of driver inattention on near-crash/crash risk: An analysis using the 100-car naturalistic driving study data (Report No. DOT HS 810 594). Washington, DC: National Highway Traffic Safety Administration.

significantly increased the probability of being involved in a crash or near crash. These results indicate that activities with relatively high visual/manual attentional demands increase risk. Taken together, the controlled laboratory and naturalistic driving studies indicate that cognitive and visual/manual distraction lead to degraded driving performance and increase crash or near crash risk.

Traffic safety stakeholders have pushed for laws to prevent distracted driving crashes. In response, States have enacted legislation with various laws that ban drivers from using cellular phones while driving. Most existing laws that apply to drivers of all ages ban the use of handheld cellular phones but allow hands-free cellular phones. The effect of the laws is mixed. In New York, the first state to enact a law banning cellular phone use, observed use of handheld cellular phones was 2.3% pre-legislation, dropping to 1.1 percent immediately after legislation took effect, and rising to 2.1% one year after legislation.⁶ The difference from pre-legislation to one year post legislation was not statistically significant. McCartt et al. reported that in New York there was no targeted enforcement and little public information and education (PI&E) after the law took effect. This gradual extinction of the effect is not surprising; the high visibility enforcement (HVE) Click It or Ticket model to change attitudes and increase use of seatbelts finds repeated success when paid media stressing active enforcement is coupled with targeted enforcement.

Yet there are limited data to measure progress. The currently proposed survey will utilize many of the questions administered in the 2010 and 2012 administrations of the NSDDAB, allowing comparison of (self-reported) exposure measures separated by a two year interval. Factors affecting the prevalence of distracted driving will also be compared to identify any changes over time.

b. Statute authorizing the collection of information

Title 23, United States Code, Chapter 4, Section 403 (Attached as Appendix A) gives the Secretary authorization to use funds appropriated to carry out this section to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to all aspects of highway and traffic safety systems and conditions relating to - vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; and human behavioral factors and their effect on highway and traffic safety, including distracted driving. [See 23 U.S.C. 403(b)(1)(A)(i), 23 U.S.C. 403(b)(1)(A)(ii), 23 U.S.C. 403(b)(1)(B)(iii)].

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 the NSDDAB is to provide critical information needed by NHTSA to develop and demonstrate effective countermeasures that meet the Agency's

⁶ McCartt, A.T., & Geary, L.L. (2004). Longer term effects of New York State's law on drivers' handheld cell phone use. *Injury Prevention*, 10, 11-15.

mandate to improve highway traffic safety. The data collected previously is used, and the new data collected will be used, to assist NHTSA in its ongoing responsibilities for: (a) developing an accurate assessment of the problem on a national scale; (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.

Specifically, the in-depth findings of the 2010 and 2012 surveys are available to the public, providing breakdowns and analyses of many of the phone questions by gender, age, and other demographics. Distraction trends from the 2010 and 2012 surveys are presented in the 2012 report. The data was also used to develop Traffic Safety Fact sheets and the first of NHTSA's new Safety in Numbers newsletters in 2013. Results of the 2010 and 2012 administrations were used to shape new demonstration projects and to target distraction related media buys.

The findings from this proposed collection of information will again assist NHTSA in addressing the problem of distracted driving and in formulating programs and recommendations. NHTSA will use the findings to help focus current programs and activities to achieve the greatest benefit, to develop new programs to decrease the likelihood of distracted driving, and to provide informational support to States, localities, and law enforcement agencies that will aid them in their efforts to reduce distracted driving crashes.

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.

In sum, the NSDDAB will provide a status report on public attitudes, knowledge, and behavior related to distracted driving issues. The data will be studied to determine appropriate emphases for future countermeasure activity. The results will also be disseminated to others for use in their research and program development activities. If these 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.

The information will also be available to anyone in the public and private sectors through the NHTSA website.

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.

CATI systems typically include 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 researchers have reviewed recent studies on distracted and unsafe driving. While a few surveys have been conducted measuring some aspects of cell phone use, none provide a comprehensive data set covering such a broad range of attitude, perception, and behavioral indices from a nationally representative sample. Without administering the NSDDAB on a periodic basis, NHTSA will not be able to accurately monitor trends in the attitudes, perceptions, and behaviors related to distracted driving. Moreover, upon approval of this information collection, NHTSA will coordinate with both the States and NHTSA's safety coalition partners to assure that the proposed information collection does not duplicate data collection planned by others.

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 randomly selected individuals, 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 current data on distracted driving behaviors, attitudes, and safety knowledge to inform driver program development and support. NHTSA would also lack trend information to assess whether there have been significant changes over time. The end result would be that the agency would not have adequate information to determine how best to apply its resources within the current environment. Adoption of devices which contribute to distracted driving changes rapidly and data need to be collected every two years in order to keep pace with this trend. There are no legal or technical obstacles to reducing burden.

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 September 5, 2013 (Vol. 78, No. 172, Pages 54729-54730). It is attached as Appendix B-1.

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. 248, Pages 78503-78504), which announced that this information collection request will be forwarded to OMB, was published December 26, 2013, providing 30 days for public comment. It is attached as Appendix B-2.

EXPERT CONSULTATION:

This study was originally designed and administered in 2010. NHTSA staff designed the survey instrument based on the key characteristics of the 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 to be included.

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

Because of the cost structure of cell phone billing currently in the United States, there often may be a financial burden upon the respondent for an incoming research call – something that does not occur with a landline phone. The American Association for Public Opinion Research (AAPOR) Cell Phone Task Force Report (2010)⁷ recommends that, when appropriate, interviewers offer a form of remuneration to offset this cost to the respondent. This study will follow that recommendation by offering \$10 compensation to respondents reached on their cell phones to account for limited calling plans.

This study will also offer \$20 to 200 people to participate in a non-response follow-up survey (see Section B.3-e). These will be people who were selected to participate in the main survey, but never responded. They are needed in order to conduct a non-response bias analysis, and an incentive is necessary to encourage their participation because of the difficulty in obtaining information from them. The Contractor has found this amount to be effective in past non-response follow-up studies they have conducted.

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

In the survey's introduction, respondents are informed that participation is voluntary, and their answers will be kept private and will be used only for statistical purposes. 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 for anyone to be identified based on his or her responses to the survey questions. Furthermore, the NHTSA Contractor will separate the responses from the telephone numbers called.

As specified in Section A-9, the Contractor will be offering compensation to respondents in the cell phone sample and to the respondents participating in the non-response bias analysis. In those cases, the Contractor will need to collect name and address information in order to send the respondent the money. The information will only be used for that purpose, and will be separated from the survey responses before the data is delivered to NHTSA by the Contractor.

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.

⁷ American Association for Public Opinion Research, Cell Phone Task Force. (2010). New considerations for survey researchers when planning and conducting RDD telephone surveys in the U.S. with respondents reached via cell phone numbers, 2010. Retrieved from http://www.aapor.org/Cell_Phone_Task_Force_Report.htm#UmmKsHDEOM8

The survey does not contain any questions related to matters that are commonly considered sensitive or private. The survey questions are directed at common driving activity.

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

Data collection will involve a pretest with 30 respondents and interviews with 6,000 randomly selected respondents during the main data collection effort. Each respondent will be administered the survey once. The survey will be conducted in 2014 and again in 2016, given appropriate funding.

NHTSA estimates that the pretest interviews will require an average of 20 minutes per interview or a total of 10 hours for the 30 respondents. Each respondent in the final survey sample would require an average of 20 minutes to complete the telephone interview or a total of 2,000 hours for the 6,000 respondents. Also, a non-response bias survey will be conducted. Each respondent would require at most 10 minutes to complete the non-response survey or a total of 33 hours for the 200 respondents. The total estimated burden is shown in Table 1.

**TABLE 1
ESTIMATED BURDEN HOURS**

	2014 Survey				2016 Survey				GRAND TOTAL
	Pretest	Main Data Collection	Non-Response Bias	TOTAL	Pretest	Main Data Collection	Non-Response Bias	TOTAL	
Respondents	30	6,000	200	6,230	30	6,000	200	6,230	12,460
Minutes	20	20	10	19.7	20	20	10	19.7	
Burden Hours	10	2,000	33	2,043	10	2,000	33	2,043	4,086

In sum, NHTSA proposes to survey up to 12,460 (6,230 each for 2014 and 2016) respondents over the life of the project and estimates a burden of 4,086 total hours (2,043 hours per administration).

Since respondents will be contacted at home, the survey will not be an actual cost to the respondents (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. At \$22.01⁸ per hour, the total annual estimated cost associated with the burden hours is: \$22.01 x 4,086 hours for a total of \$89,932.86 (if all possible respondents in Error: Reference source not found are surveyed). Respondents would not incur any other reporting cost from the information collection.

⁸ US Department of Labor, Bureau of Labor Statistics (2013). May 2012 National Occupational Employment and Wage Estimates – Mean Hourly Wage (All Occupations). http://www.bls.gov/oes/current/oes_nat.htm

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 contacted randomly, and asked for their attitudes, knowledge, and behavior related to distracted driving. 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 start up 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	12,460
Total estimated cost of conducting two surveys	\$1,441,962
Cost per completed interview	\$115.73

This estimate is based on the total cost of the awarded survey contract plus the cost of an option year divided by the specified number of completed pretest/survey interviews. The total contract cost includes briefings, trainings, survey development, limited cell phone use compensation, analyses, report writing, and other project planning and administrative costs.

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

This is a revision of OMB Control Number 2127-0665 (ICR Reference No: 200911-2127-001). In this ICR, we are requesting clearance for the National Distracted Driving Telephone Survey (not the intercept survey associated with two State demonstration programs or the intercept survey for the texting demonstration programs). The first intercept survey was renewed under the OMB Control Number, 2127-0665 (ICR Reference No: 201303-2127-006) for 22,200 responses and time burden of 1,850 hours. The second intercept survey was renewed under OMB Control Number 2127-0665 (ICR Reference No: 201303-2027-006) for 12,000 responses and time burden of 1,000 hours. There are no program changes or adjustments to Item 13. There are adjustments to Item 14 for the telephone survey for two reasons:

- The sample of respondents is slightly larger (6,230 vs. 6,000 per administration) to allow for 30 pretest interviews to verify CATI programming and to check question wording and flow and to allow for 200 non-response bias interviews;
- The previous estimate for survey cost was based on information from a much different survey - the 2009 *Click It or Ticket* phone survey, and did not include the associated survey costs resulting in a lower estimated cost than resulted. The total contract cost ceiling is \$1,441,962, or \$115.73 per completed survey (cell

and landline). The previous ICR indicated that landline surveys were \$25 per respondent and cell phone surveys were \$30 per respondent.

Given these adjustments the total cost to conduct the survey in 2014 and 2016 is estimated at \$1,441,962, a change from the previous request for clearance.

This is a new information collection. As such, it requires a program change to add the estimated 4,086 hours for the new information collection to existing burden.

ICR Reference No.	Request Type	Purpose	Approved	Responses	Time Burden (Hours)
200911-2127-001	New	Telephone and intercept surveys	2/2/2010	10,267	2,711
201303-2127-006	Revision	Intercept surveys	7/12/2013	22,200	1,850
201303-2127-006	Revision	Intercept surveys (texting)	3/12/2014	12,000	1,000
Current	Revision	Telephone surveys	Current	12,460	4,086
Total requests				56,927	9,647

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

Weighted frequencies will be computed for each of the questions in the survey. Cross-tabular analyses of the survey data by population subgroups 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 behaviors and attitudes 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 distributed to traffic safety officials and other interested persons at the national, State and local levels. Those reports will be available

to the general public on the NHTSA web site. The data will also be placed in the public domain, available through the NHTSA web site.

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.