

U.S. Department of Labor  
Occupational Safety and Health Administration  
Final Supporting Statement

**SUPPORTING STATEMENT FOR THE  
INFORMATION COLLECTION REQUIREMENTS OF THE  
STANDARD ON POWERED INDUSTRIAL TRUCKS (29 CFR 1910.178)<sup>1</sup>  
OFFICE OF MANAGEMENT AND BUDGET (OMB)  
CONTROL NO. 1218-0242 (July 2014)**

**A. JUSTIFICATION**

**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.**

The main purpose of the Occupational Safety and Health Act (“OSH Act” or “Act”) is to “assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” (29 U.S.C. 651). To achieve this objective, the OSH Act specifically authorizes “the development and promulgation of occupational safety and health standards” (29 U.S.C. 651). In addition, the OSH Act specifies that “[e]ach employer shall make, keep and preserve, and make available to the Secretary . . . such records regarding . . . activities relating to this Act as the Secretary . . . may prescribe by regulation as necessary or appropriate for the enforcement of this Act . . .” (29 U.S.C. 657).

The Act specifically authorizes the Occupational Safety and Health Administration (“OSHA” or “Agency”) to issue standards that “prescribe the use of labels or other appropriate forms of warning as are necessary to insure that workers are apprized of all hazards to which they are exposed, relevant symptoms and appropriate emergency treatment, and proper conditions and precautions of safe use or exposure” (29 U.S.C. 655). In addition, the OSH Act mandates that “[e]ach employer shall make, keep and preserve, and make available to the Secretary...such records...as the Secretary...may prescribe by regulation as necessary or appropriate for the enforcement of the Act...”(29 U.S.C. 657).

Under the authority granted by the OSH Act, OSHA published the Powered Industrial Trucks (the “Standard;” 29 CFR 1910.178). The Standard contains several information collection requirements addressing truck design, construction, and modification, as well as certification of training and evaluation for truck operators. Items 2 and 12 below describe in detail the specific information collection requirements of the Standard.

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<sup>1</sup>The purpose of this Supporting Statement is to analyze and describe the burden hours and costs associated with provisions of this standard that contain paperwork requirements; this Supporting Statement does not provide information or guidance on how to comply with, or how to enforce, the standards.

**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.**

Paragraph (a)(4) of the Standard requires that employers obtain the manufacturer's written approval before modifying a truck in a manner that affects its capacity and safe operation; if the manufacturer grants such approval, the employer must revise capacity, operation, and maintenance instruction plates, tags, and decals accordingly. For front-end attachments not installed by the manufacturer, paragraph (a)(5) mandates that employers provide a marker on the trucks that identifies the attachment, as well as the weight of both the truck and the attachment when the attachment is at maximum elevation with a laterally centered load. Paragraph (a)(6) specifies that employers must ensure that the markers required by paragraphs (a)(3) through (a)(5) remain affixed to trucks and are legible.

Paragraph (1)(4) through (1)(6) of the Standard contain the paperwork requirements necessary to certify the evaluation and training provided to powered industrial truck operators. Accordingly, these paragraphs specify the following requirements for employers.

- Paragraph (1)(4)(iii)—evaluate each operator's performance at least once every three years.
- Paragraph (1)(6)--Certify that each operator meets the training and evaluation requirements specified by paragraph (1). This certification must include the operator's name, the training date, the evaluation date, and the identity of the individual(s) who performed the training and evaluation.

Requiring labels (markings) of modified equipment notifies workers of the conditions under which they can safely operate powered industrial trucks; thereby, preventing such hazards as fires and explosions caused by poorly designed electrical systems, rollovers/tipovers that result from exceeding a truck's stability characteristics, and falling loads that occur when loads exceed the lifting capacities of attachments. Certification of training and evaluation provides a means of informing employers that their workers received the training, and demonstrated the performance necessary to operate a truck within its capacity and control limitations. Therefore, by ensuring that workers operate only trucks that are in proper working order, and do so safely, employers prevent possible severe injury or death of truck operators and other workers who are in the vicinity of the trucks. Finally, these paperwork requirements are the most efficient means for an OSHA compliance officer to determine that an employer properly notified workers regarding the design and construction of, and modifications made to, the trucks they are operating, and that an employer provided them with the required training.

**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 forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burdens.**

Employers may use improved information technology, including electronic recording, when establishing or maintaining records.

**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 A.2 above.**

The information collection requirements in the Standard are specific to each employer and worker involved, and no other source or agency duplicates the requirements or can make the required information available to OSHA (i.e., the required information is available only from, or applies only to, the employers covered by the Standard).

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collection requirements specified by the Standard do not have a significant impact on a substantial number of small entities.

**6. Describe the consequence to federal program or policy activities if the collection is not conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The Agency believes that the information collection frequencies required by the Standard are the minimum frequencies necessary to fulfill its mandate “to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources” as specified by the OSH Act at 29 U.S.C. 651. Accordingly, if employers do not perform the required information collections, or delay in providing this information, workers may be at risk of serious injuries or death while operating powered industrial trucks.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the Agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in aid, or tax records for more than three years;**
- **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

**requiring respondents to submit proprietary trade secret, or other confidential information unless the Agency can prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that require employers to collect information using the procedures specified by this item. The requirements of the Standard are within the guidelines set forth in 5 CFR 1320.5.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection before submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the Agency in response to those comments specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on May 9, 2014 (79 FR 26776) soliciting comments on its proposal to extend the Office of Management and Budget's approval of the information collection requirements specified by the Standard on Powered Industrial Trucks (29 CFR 1910.178). This notice was part of a preclearance consultation program that provided the general public and government agencies with an opportunity to comment on OSHA's request for an extension by OMB of a previous approval of information collection requirements found in the Standard. The public was directed to submit their comments to docket number OSHA-2011-0062. In response to its notice, the Agency received one comment from a private citizen, Mr. Aaron Adamczyk docket exhibit number (ID: OSHA-2011-0062-0006).

OSHA recognizes that the Standard does not reflect the latest editions of consensus standards and has undertaken a multi-year project to update these standards. A notice describing the project was published in November 2004 (69 FR 68283). Additional information about this project may be found in the spring 2014 Regulatory Agenda (Regulatory Action Titled: Updating OSHA Standards Based on National Consensus Standards Eye and Face Protection, RIN: 1218-AC87).

The outdated consensus standards do not impact the collection of information requirements contained in the Standard; therefore, the Agency will retain its estimated burden hours and cost estimates.

**9. Explain any decision to provide any payments or gift to respondents, other than reenumeration of contractors or grantees.**

The Agency will not provide payments or gifts to the respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

No such assurance is necessary because the paperwork requirements specified by the Standard do not involve confidential information.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

None of the information collection provisions of the Standard ask for sensitive information.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage-rate categories.**

## **Burden Hour and Cost Determinations**

In 1998, OSHA published a final rule in which it revised the operator training requirements specified by paragraph (l) of the Standard (see 63 FR 66238). As part of this rulemaking, the Agency performed a Final Economic Analysis (FEA) (see 63 FR 66262). Using data from the FEA for the burden hour and cost estimates described below, OSHA finds that the Standard applies to employers using an estimated 1,106,552 powered industrial trucks operated by about 1,659,828 workers.<sup>2</sup> There are approximately 4.71 million establishments in NAICS codes where such trucks are used; however, the actual number of establishments using such trucks is

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<sup>2</sup>Source: County Business Patterns, U.S. Census Bureau, 2011. This value reflects the overall 6.18% decrease in employment across all industries from 2008 to 2011 (1,769,162 x 0.9382). Additionally, the FEA estimated that each powered industrial truck was used by an average 1.5 operators; to determine the current number of powered industrial trucks in use, OSHA divided the estimated number of workers covered by the Standard by 1.5 (i.e., 1,659,828 ÷ 1.5).

substantially smaller.<sup>3</sup> In addition, the Agency uses the following wage rates in determining the cost of the information collection requirements specified by the Standard.

Supervisory Manufacturing Worker:	\$35.14 <sup>4</sup>
Manufacturing Worker:	\$25.94 <sup>5</sup>
Clerical/Secretary:	\$23.51 <sup>6</sup>

**(A) Notification of Truck Modifications (§ 1910.178(a)(4))**

Based on a public comment received on a previous ICR,<sup>7</sup> most of the truck modifications involve attachments covered by paragraph (a)(5) of the Standard. OSHA assumes that each year, employers obtain manufacturers' written approval to modify 0.2 percent of the powered industrial trucks in a manner that affects their capacity and safe operation. For the purpose of estimating the paperwork burden for this provision, OSHA estimates that the time involved in seeking approval is the only collection of information (paperwork) burden involved with this provision since the burden to affix new data plates or markings would be a usual and customary practice by the firm that undertakes the modification or addition. OSHA estimates the approval process takes approximately one hour. Accordingly, the annual burden hours and cost of this paperwork requirement are:

Burden hours: 1,106,552 trucks x .002 x 1 hour = 2,213 hours  
Cost: 2,213 hours x \$25.94 = \$57,405

**(B) Notification of Front-End Attachments (§ 1910.178(a)(5))**

OSHA has no information regarding the number of powered industrial trucks that have front-end attachments installed by employers. Based on the previous public comment received, OSHA believes that few; if any, employers have trucks that require modification to the nameplates and

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<sup>3</sup>The previous ICR estimated that there were approximately 4.86 million establishments in NAICS codes where such trucks are used. The ratio of total establishments in 2008 (7,601,169) to total establishments in 2011 (7,354,043) according to County Business Patterns was used to estimate the number of establishments where such trucks are used.

<sup>4</sup>Source: *Employer Costs for Employee Compensation, News Release, December 2013, Table 10*. U.S. Department of Labor, Bureau of Labor Statistics. Class – All workers, goods producing industries: Manufacturing. Total compensation rate includes benefits of 34.7 percent.

<sup>5</sup>Source: *Employer Costs for Employee Compensation, News Release, December 2013, Table 9*. U.S. Department of Labor, Bureau of Labor Statistics. Class – Production, transportation, and material moving – Production. Wage rate includes benefits of 34.1 percent.

<sup>6</sup>Source: *Employer Costs for Employee Compensation, News Release, December 2013, Table 9*. U.S. Department of Labor, Bureau of Labor Statistics. Class – Office and administrative support. Wage rate includes benefits of 30.8 percent.

<sup>7</sup>See ICR-1218-0242(2001), Ex. 2-1.

markings provided by the manufacturer with the original truck. OSHA estimates that 0.1 percent of all trucks in use are subject to the provision in (a)(5) of the Standard, and that a manufacturing worker takes 30 minutes (.50 hour) to obtain the new information, prepare, and attach the data plate. Accordingly, the annual burden hours and cost of this paperwork requirement are:

Burden hours: 1,106,552 trucks x .001 x .50 hour = 553 hours

Cost: 553 hours x \$25.94 = \$14,345

**(C) Inspection of Markers (§ 1910.178(a)(6))**

Employers incur a burden to obtain the information to replace data plates or approval markings required by paragraphs (a)(3) through (a)(5) of the Standard, if, for example, the original labels/markings are destroyed or otherwise become illegible. Based on a public comment received on a previous ICR, OSHA estimates that about 20 percent (221,310) of all trucks fall into the category of an “approved” truck and of those trucks, perhaps 1 percent require a new data plate or marking for the reasons described above. OSHA estimates that a manufacturing worker takes 5 minutes (.08 hour) to affix the new plates/markings. Accordingly, the annual burden hours and cost of this paperwork requirement are:

Burden hours: 221,310 trucks x .01 x .08 hour = 177 hours

Cost: 177 hours x \$25.94 = \$4,591

**(D) Operator Evaluation (§ 1910.178(l)(4)(iii) and (l)(5))**

Triennial Evaluation (§ 1910.178(l)(4)(iii))

Based on data from the FEA, OSHA determined that supervisors evaluate one-third (553,276) of the operators each year, and that a supervisor, takes 30 minutes (.50 hour) to perform the evaluation. Therefore, the yearly burden hour and cost estimates for conducting these evaluations are:

Burden hours: 553,276 operators x .50 hour to perform evaluation = 276,638 hours

Cost: 276,638 hours x \$35.14 = \$9,721,059

Evaluating Rehires (§ 1910.178(l)(5))

OSHA estimates that a supervisor requires 10 minutes (.17 hour) each to evaluate the 248,974 rehires.<sup>8</sup> Accordingly, the annual estimated burden hours and cost for this requirement are:

$$\begin{aligned} \text{Burden hours: } & 248,974 \text{ rehires} \times .17 \text{ hour} = 42,326 \text{ hours} \\ \text{Cost: } & 42,326 \text{ hours} \times \$35.14 = \$1,487,336 \end{aligned}$$

Certification Records of Evaluations and Training (§ 1910.178(l)(6))

(a) Initial Training (§ 1910.178(l)(1) through (l)(3))

OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain each initial training certification record. The annual estimated burden hours and cost for this requirement are:

$$\begin{aligned} \text{Burden hours: } & 248,974 \text{ workers} \times .05 \text{ hour} = 12,449 \text{ hours} \\ \text{Cost: } & 12,449 \times \$23.51 = \$292,676 \end{aligned}$$

(b) Refresher Training (§ 1910.178(l)(4)(i) and (l)(4)(ii))

OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain each refresher training certification record. The annual estimated burden hours and cost for this requirement are:

$$\begin{aligned} \text{Burden hours: } & 82,991 \text{ workers} \times .05 \text{ hour} = 4,150 \text{ hours} \\ \text{Cost: } & 4,150 \times \$23.51 = \$97,567 \end{aligned}$$

(c) Rehires (§ 1910.178(l)(5))

OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain each certification record for rehires after training. The annual estimated burden hours and cost for this requirement are:

$$\begin{aligned} \text{Burden hours: } & 248,974 \text{ workers} \times .05 \text{ hour} = 12,449 \text{ hours} \\ \text{Cost: } & 12,449 \times \$23.51 = \$292,676 \end{aligned}$$

(d) Triennial Evaluation (§ 1910.178(l)(4)(iii))

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<sup>8</sup>Several factors expedite this evaluation compared to a triennial evaluation; first, the rehires may have recent training certification records available for review and, second, a short interview is often sufficient to determine which topics require additional training.



OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain a certification record for each worker's triennial evaluation. The annual estimated burden hours and cost for this requirement are:

Burden hours: 553,276 workers x .05 hour = 27,664 hours  
Cost: 27,664 hours x \$23.51 = \$650,381

(e) Evaluating Rehires (§ 1910.178(l)(5))

OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain a certification record for each rehired worker's evaluation. The annual estimated burden hours and cost for this requirement are:

Burden hours: 248,974 rehires x .05 hour = 12,449 hours  
Cost: 12,449 hours x \$23.51 = \$292,676

**(E) Disclosure of Evaluation and Training Certification Records**

OSHA estimates that it may conduct approximately 15,492 inspections during the time period covered by this ICR.<sup>9</sup> OSHA estimates that it will take a supervisor 10 minutes (.17 hour) to disclose evaluation and training certification records (because of the number of certifications records involved).

Burden hours: 15,492 inspections x .17 hour = 2,634 hours  
Cost: 2,634 hours x \$35.14 = \$92,559

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out**

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<sup>9</sup>The Agency estimated the number of inspections by determining the inspection rate (1.4 percent) for all establishments under the jurisdiction of the OSH Act (including both Federal OSHA and approved state-plan agencies) and then multiplying the total number of trucks covered by the Standard by this percentage (i.e., 1,106,552 trucks x 1.4 percent = 15,492 inspections).

**information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondent (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact**

**analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or Portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Employers incur costs to obtain the new data plates and “approval” markings from the manufacturer and testing laboratory. Based on previous comments, the cost figures ranged from free to \$150 for the data plate, and \$30 for markings from the testing lab. The Agency does not believe these costs have increased dramatically, and is retaining them in this ICR. OSHA is using an average cost of \$75 for the data plates and \$30 for the approval markings, or \$105 for both. As noted in item 12 (A), OSHA estimates that approximately 2,213 trucks may require a new plate or marking.

Cost: 2,213 trucks x \$105 = \$232,365

**14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.**

OSHA estimates that a compliance officer (GS-12, step 5), at an hourly wage rate of \$37.74<sup>10</sup> spends about five minutes (.08 hour) during an inspection reviewing training certificates and other paperwork requirements specified by the Standard. The Agency determines that its compliance officers will conduct 15,492 inspections during each year covered by this ICR (see footnote <sup>10</sup>). OSHA considers other expenses, such as equipment, overhead, and support staff salaries, as normal operating expenses that would occur without the collection of information requirements specified by the Standard. Therefore, the annual total cost of these paperwork requirements to the Federal government is:

**Cost:** 15,492 inspections x .08 hour x \$37.74 = \$46,773

**15. Explain the reasons for any program changes or adjustments.**

OSHA is proposing an adjustment decrease to the existing burden hour estimate of the collection of information requirements specified by the Standard. In this regard, the Agency is proposing to decrease the current burden hour estimate from 888,244 hours to 393,702 hours, a total decrease of 494,542 hours. The reasons for this reduction is a decrease in the number of trucks and the removal of burden hours associated with the time that employers provide training to workers. In addition, there is a decrease in costs under Item 13 from \$247,640 to \$232,365; a

<sup>10</sup> SOURCE: U.S. Office of Personnel Management, *General Schedule and Locality Tables, Salary Table 2014-RUS*, <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/salhr1.pdf>.

total decrease of \$15,275. This decrease is also the result in a decline in the number of trucks covered under the Standard.

Upon a thorough review of the collection of information requirements contained in this standard, OSHA has determined that the following training provisions are not collections of information, and; therefore, have been removed from this supporting statement:

(§ 1910.178(l)(1) through (l)(3)); (§ 1910.178(l)(4)(i) and (l)(4)(ii)), and (§ 1910.178(l)(5)). In addition, the Agency was able to gather data updating the number of trucks and operators. Table 1 below describes each of the proposed burden hour adjustments.

**16. For collections 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 information, completion of report, publication dates, and other actions.**

OSHA will not publish the information collected under the Standard.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.**

OSHA lists current valid control numbers in §§1910.8, 1915.8, 1917.4, 1918.4, and 1926.5 and publishes the expiration date in the Federal Register notice announcing OMB approval of the information collection requirement. (See 5 CFR 1320.3(f)(3)). OSHA believes that this is the most appropriate and accurate mechanism to inform interested parties of these expiration dates.

**18. Explain each exception to the certification statement.**

OSHA is not requesting an exception to the certification statement.

## **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This request does not contain any collection of information requirements that employ statistical methods.

**Table 1**

**Proposed Burden Hour Adjustments**

<b>Information Collection Requirement</b>	<b>Current Burden Hours</b>	<b>Proposed Burden Hours</b>	<b>Adjustment (Hours)</b>	<b>Cost Under Item 12</b>	<b>Responses</b>	<b>Explanation of Adjustment</b>
<b>(A) Notification of Truck Modifications (§ 1910.178(a)(4))</b>	2,359	2,213	-146	\$57,405	2,213	The adjustment decrease is due to updated data indicating a decrease in the number of powered industrial trucks from 1,179,441 to 1,106,552.
<b>(B) Notification of Front-End Attachments (§ 1910.178(a)(5))</b>	590	553	-37	\$14,345	1,107	The adjustment decrease is due to updated data indicating a decrease in the number of powered industrial trucks.
<b>(C) Inspection of Data Plates or Markers (§ 1910.178(a)(6))</b>	189	177	-12	\$4,591	2,213	The adjustment decrease is due to updated data indicating a decrease in the number of powered industrial trucks.
Operator Training (§ 1910.178(l)(1) through (l)(3), (l)(4)(i), (l)(4)(ii), and (l)(5))						Upon further analysis, the requirements that employers provide training to workers under paragraphs (1)(1) through (1)(3), (1)(4) and (1)(4)(ii), and (1)(5) are not considered to be collections of information. OSHA is not taking burden for these activities under Item 12 of this Supporting Statement
<i>Initial Training</i> (§ 1910.178(l)(1) through (l)(3))	204,671	0	-204,671	\$0	0	
<i>Refresher Training</i> (§ 1910.178 (1)(4)(i) and (l)(4)(ii))	191,954	0	-191,954	\$0	0	
<i>Training New Hires Who Have Had Previous Training (Rehires)</i> (§ 1910.178(1)(5))	71,983	0	-71,983	\$0	553,276	
<b>(D) Operator Evaluation (§ 1910.178(l)(4)(iii), (l)(5), and (l)(6))</b>						The adjustment decreases are due to updated data indicating a decrease in the number of powered industrial truck operators.
<i>Triennial Evaluation</i> (§ 1910.178(1)(4)(iii))	294,861	276,638	-18,223	\$9,721,059	553,276	

<b>Information Collection Requirement</b>	<b>Current Burden Hours</b>	<b>Proposed Burden Hours</b>	<b>Adjustment (Hours)</b>	<b>Cost Under Item 12</b>	<b>Responses</b>	<b>Explanation of Adjustment</b>
<i>Evaluating Rehires (§ 1910.178(1)(5))</i>	45,114	42,326	-2,788	\$1,487,336	248,974	
<b>Certification Records of Evaluations and Training (§ 1910.178(1)(6))</b>						
(a) Initial Training (§§ 1910.178(1)(1)-(1)(3))	13,269	12,449	-820	\$292,676	248,974	The adjustment decreases are due to updated data indicating a decrease in the number of powered industrial truck operators.
(b) Refresher Training (§§ (1)(4)(i) & (1)(4)(ii))	4,423	4,150	-273	\$97,567	82,991	
(c) Rehires (§ 1910.178(1)(5))	13,269	12,449	-820	\$292,676	248,974	
(d) Triennial Evaluation (§ 1910.178(1)(4)(iii))	29,486	27,664	-1,822	\$650,381	553,276	
(e) Evaluating Rehires (§ 1910.178(1)(5))	13,269	12,449	-820	\$292,676	248,974	
<b>(F) Disclosure of Evaluation and Training Certification Records</b>	2,807	2,634	-173	\$92,559	15,492	The adjustment decrease is due to updated data indicating a decrease in the number of establishments.
<b>TOTALS</b>	<b>888,244</b>	<b>393,702</b>	<b>-494,542</b>	<b>\$13,003,271</b>	<b>2,206,464</b>	