

**SUPPORTING STATEMENT  
FOR  
CONSOLIDATED CHILD RESTRAINT SYSTEM REGISTRATION, LABELING AND  
DEFECT NOTIFICATION**

**A. JUSTIFICATION**

1. Explain the circumstances that make the collection of information necessary.

This information collection is a modification to the existing information collection “Consolidated Child Restraint System Registration, Labeling and Defect Notification” (OMB Control Number: 2127-0576). The modification consists of requiring all child restraint manufacturers to provide a new statement on the existing label with a clear and consistent message to consumers regarding the use of the lower anchorages of child restraint anchorage systems for installing certain child restraint systems (CRSs) (those that have internal harnesses, and that are recommended for older children). In addition, this collection modification supports the United States Department of Transportation’s (DOT) strategic goal in safety, by working towards the elimination of transportation related deaths and injuries involving children.

The National Highway Traffic Safety Administration (NHTSA) statute at 49 U.S.C. Subchapter II Standards and Compliance, sections 30111 and 30117, authorizes the issuance of Federal motor vehicle safety standards (FMVSS). The Secretary is authorized to issue, amend, and revoke such rules and regulations as she/he deems necessary. The Secretary is also authorized to require manufacturers to provide information to first purchasers of motor vehicles or motor vehicle equipment when the vehicle or equipment is purchased, in a printed matter placed in the vehicle or attached to or accompanying the equipment.

Using this authority, the agency issued a FMVSS No. 213, “Child restraint systems,” supplemental notice of proposed rulemaking (SNPRM) in 2010, (75 FR 71648) where the agency proposed a new label for all harness-equipped CRSs recommended for older children indicating that the lower anchorages may only be used to attach the CRS to the vehicle seat when with children weighing up to 65 pounds (lb).

In a February 27, 2012 FMVSS No. 213 final rule (77 FR 11626), the agency modified the proposed label and the requirements for printed instructions. In accordance with the final rule, the label and printed instructions will be unique to each CRS model equipped with an internal harness. Such CRSs will have to be labeled with information instructing the consumer that the lower anchorages may be used to attach the CRS to the vehicle seat when restraining a child weighing “x” lb or less using the CRS's internal harness where the “x” value depends on the weight of the CRS. The clear and direct information will reduce the risk that the consumer will keep the child attached to the vehicle via the lower anchorages beyond the design parameters of the child restraint anchorage system.

On February 25, 2014 the agency published a final rule responding to petitions for reconsideration (79 FR 10396) of the February 2012 final rule. The petitions stated,

among other things, that the label that was required by the 2012 rule was unclear and could be misunderstood. In response, NHTSA made minor adjustments to the labeling requirement to make it clearer and more reader friendly.

The existing information collection “Consolidated Child Restraint System Registration, Labeling and Defect Notification” (OMB Control Number: 2127-0576) ensures that child restraint manufacturers: (1) produce registration cards, labels and brochures, (2) collect CRS owner registration information and (3) create and keep registration records. In the existing information collection, each manufacturer of CRSs must label each system and provide brochures with safety information and instructions on using the CRS to inform the consumer on how to properly use the restraints. Each manufacturer must also collect owner registrations from a required registration card provided with the CRS, from the internet (for those manufacturers that allow electronic registration) or from a substitute form sent to the owner by NHTSA, and develop and maintain a filing system that contains the owner’s name and address to inform consumers of safety recalls of their CRS.

The modification to the existing information collection will add information to the consumer on how to properly use the lower anchors of the child restraint anchorage system to attach the child restraint to the vehicle through labels and printed instructions. The purpose of this label is to reduce consumer confusion about using the child restraint anchorage system and to assure that the lower anchors will be able to withstand the forces generated by the child and CRS in virtually all crashes.

2. Indicate how, by whom, and for what purpose the information will be used.

The additional requirements of this collection apply to child restraint manufacturers. The provisions of the collection require child restraint manufacturers to add a sentence to the existing instructions and label of CRSs that will inform the consumer that the lower anchors of a child restraint anchorage system may be used to install a CRS until the weight of the child is equal to or less than the specified weight.

The purpose of this label is to reduce consumer confusion about using child restraint anchorage systems, and to assure that the lower anchors will be able to withstand the forces generated by the child and CRS in virtually all crashes. Each manufacturer of CRSs must label each system and provide instructions on lower anchor use. If such information is not provided, the consumer will not know how to properly use the CRS. Without proper use, the effectiveness of these systems is greatly diminished. A permanently attached label gives quick-look information on recommended installation and use of the lower anchors of the CRS.

3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.

The additional requirements for this collection involve minimal use of technological techniques. The necessary information can be gathered by the manufacturer through the use of a weighing scale.

4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.

NHTSA is the only Federal agency regulating CRSs. Only this agency requires manufacturers of CRSs to label them or to collect registration information covering names and addresses of CRS owners.

No other similar information is available. Each CRS model is different and requires its own deployment and use instructions. Each user of a CRS needs such information.

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

This regulation applies to all manufacturers of CRSs. In total, there are currently 15 manufacturers producing CRSs and none of which are considered small business entities.<sup>1</sup> The additional information that must be provided in order to comply with this standard amendment is minimal and takes an estimated 2 seconds to determine.

6. Describe the consequences to Federal program and policy activities if the information is not collected or collected less frequently.

If the information is not collected, there is no assurance that CRS owners will be given proper use information. The information currently provided on or with the CRS includes instructions on how to correctly use the CRS, and recommendations on which children are suitable for the CRS. Without this information, the effectiveness of the CRS could be greatly diminished.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

There are no special circumstances requiring the labeling to be reported in a manner inconsistent with those specified in 5 CFR 1320.6.

8. Attach the Federal Register document soliciting comments on extending the collection of information, and a summary of all public comments responding to the notice. Describe efforts to consult with persons outside the agency to obtain their views.

The document was published 60-day FRN on February 27, 2012 (77 FR 11626). NHTSA did not receive any comments related to this matter.

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<sup>1</sup> According to the Small Business Administration (SBA) database listed at [http://dsbs.sba.gov/dsbs/search/dsp\\_dsbs.cfm](http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm).

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

No payment or gift will be provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

This item does not apply. No assurances of confidentiality are given by the agency, since labeling is a part of the manufacturing process. The required installation and use information is about the use of CRSs by consumers and confidentiality is neither desired nor necessary.

11. Provide additional justification for any questions that are commonly considered private.

The required labeling is on the use of CRSs and does not include information that might be considered sensitive or private.

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

*Estimated Additional Annual Burden: 1,250 hours*

*Number of Respondents: 15*

The estimate of the total additional burden of the collection of information for FMVSS No. 213 is 1,250 hours. The total additional burden hours for this collection consist of the hours spent determining the maximum allowable child weight for lower anchor use and adding the information to the existing label and instruction manual.

This consists of reporting hours shown below:

Annual Burden for Reporting

Number of CRS Manufacturers (Respondents).....	15
Number of CRS Produced Each Year.....	4,500,000
Label Required (%).....	50
Number of CRS Requiring Label.....	2,250,000
Hours to Determine Information on the Label for Each CRS Design .....	2 seconds (5.56 x 10 <sup>-4</sup> hr)

Approximately 10,600,000 child restraints (including booster seats) are sold each year, where 4,500,00 of them are child restraints equipped with an internal harness. About half (50%) of the child restraints equipped with an internal harness would require the proposed label information (2,250,000). Manufacturers must spend 2 seconds (5.56 x 10<sup>-4</sup> hours) to determine the maximum allowable child weight for lower anchor use and to add the information to the existing label and instruction manual. Given these estimates, the estimated total additional annual burden hours for this proposed addition label information is 1,250 hours (4,500,000 child restraints X 50% X 5.56 x 10<sup>-4</sup> hours).

Assuming an average cost of \$20.00 per hour for professional/clerical personnel to calculate the weight value that should be displayed on the label, the total additional cost is estimated by multiplying 1,250 hours by \$20.00 an hour which equals \$25,000.

The estimated total annual burden hours for this collection of information are 40,497 hours (39,247 hours + 1,250 hours) and the total cost is \$809,940 (\$784,940 + \$25,000).

13. Provide estimates of the total annual cost to the respondents or record keepers.

There is no additional estimated cost to the respondents or record keepers.

14. Provide estimates of the annualized cost to the Federal government.

There is no additional estimated cost to the Federal government associated with the required label information.

15. Explain reasons for any program changes or adjustments.

This action modifies OMB control number 2127-0576, "49 CFR 571.213, Consolidated Child Restraint System Registration, Labeling and Defect Notification" by adding a statement on the existing label and instruction manual according to the final rule published on February 27, 2012 (77 FR 11626). The annual cost to CRS manufacturers listed in item 13 results from the additional hours needed to determine the maximum allowable child weight for using the lower anchors of the child restraint anchorage system as a means of installation and to add this information on an existing label and instruction manual. There will be an adjustment of adding in an additional 1,250 burden hours. The purpose of this label is to reduce consumer confusion about using child restraint anchorage systems and to assure that the lower anchors will be able to withstand the forces generated by the child and CRS in virtually all crashes.

16. For collections of information whose results are planned to be published, outline plans for tabulation, and publication.

The collected data on the label will not be published for statistical use.

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.

Approval is not sought to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement.

No exception is made to any of the items in the certification statement.