

SUPPORTING STATEMENT
National Transit Asset Management
OMB CONTROL NO. 2132-0579

A. JUSTIFICATION

The purpose of this request is to seek the Office of Management and Budget's (OMB) approval for a new information collection that is associated with a Final Rulemaking. This final rule requires FTA grantees to develop management plans for their public transportation assets, including vehicles, facilities, equipment, and other infrastructure. The Transit Asset Management (TAM) final rule asks transit agencies to develop a strategic approach to maintain and improve capital assets. Every FTA-supported transit provider will be required to inventory and assess the conditions of their assets, develop priorities for investment based on the inventory, and establish performance targets. The rule, established under MAP-21 legislation, is intended to close the gap on aging and poorly maintained transit assets.

The supporting statement below includes the requirements pertaining to the transit asset management requirements of the Final Rule. It does not cover amendments to regulations for FTA's National Transit Database (NTD) at 49 CFR part 630, to conform with the proposed reporting requirements for transit asset management. Although the rule requires that a TAM Plan include an asset inventory, this PRA only includes the cost and burden of the new data collection requirements under the TAM final rule. FTA funding recipients currently report asset inventory data to NTD, including data on the number of vehicles and the date of purchase. Accordingly, the burden for collecting transit asset management data will be covered by an existing information collection (National Transit Database OMB# 2132-0008). That information collection request is being submitted concurrently with the TAM final rule.

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

Critical to the safety and performance of a public transportation system is the condition of its capital assets—most notably, a system's equipment, rolling stock, infrastructure, and facilities. When transit systems are not in a state of good repair, the consequences include increased safety risks, decreased system reliability, higher maintenance costs, and overall lower system performance. Insufficient funding combined with inadequate asset management practices have contributed to an estimated \$86.9 billion transit state of good repair (SGR) backlog—a value derived from FTA's Transit

Economic Requirements Model (TERM) Scale and representative of the reinvestment cost to improve transit asset conditions to the midpoint of its 1 (poor) to 5 (excellent) scale. Furthermore, FTA estimates that an additional \$2.5 billion per year above current funding levels from all levels of government is needed just to prevent the SGR backlog from growing; a figure that poses a significant challenge during these fiscally constrained times.

Calendar year 2013 marked the highest ridership level for transit since 1957—with the number of trips exceeding 10 billion for the 7th year in a row. Moreover, factors such as the migration of people to urban areas, an aging population that will rely heavily on public transportation and a retiring transit maintenance workforce will further increase demands on existing public transportation systems. Given existing fiscal constraints, it is unlikely that the Nation's state of good repair (SGR) backlog can be addressed through increased spending alone. Rather, a systematic approach is needed to ensure that existing funding resources are strategically managed to target the SGR backlog.

This final rule establishes a National Transit Asset Management (TAM) System in accordance with section 20019 of the Moving Ahead for Progress in the 21st Century Act (MAP-21; Pub. L. 112-141 (2012), codified at 49 U.S.C. 5326 (section 5326). A transit asset management system is defined as “a strategic and systematic process of operating, maintaining, and improving public transportation capital assets effectively through the life cycle of such assets.” 49 U.S.C. 5326(a)(3). The National TAM System must include the following: a definition of the term “state of good repair”; a requirement that all recipients and sub-recipients under Chapter 53 develop a TAM Plan, which would include an asset inventory, an assessment of the condition of those assets, decision support tools, and investment prioritization; annual reporting requirements; and technical assistance provided by FTA to recipients, including an analytical process or decision support tool that allows for the estimation of capital asset needs and assists with investment prioritization. 49 U.S.C. 5326(b). In addition, section 5326 requires the Secretary to establish SGR performance measures, and recipients are required to set performance targets based on the measures. 49 U.S.C. 5326(c)(1) and (2). Furthermore, each designated recipient is required to submit an annual report to the Secretary on both the condition of their recipients' public transportation systems and include a description of any change in condition since the last report (49 U.S.C. 5326 (b)(3), and its recipients' progress towards meeting performance targets established during that fiscal year and

a description of the recipients' performance targets for the subsequent fiscal year. (49 U.S.C. 5326(c)(3)).¹

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The primary users of the information will be FTA and the transit providers (FTA grant recipients and sub-recipients). There are two groups of transit providers that will be providing information; Tier I provider means a recipient that owns, operates, or manages either (1) one hundred and one (101) or more vehicles in revenue service during peak regular service across all fixed route modes or in any one non-fixed route mode, or (2) rail transit, and Tier II provider means a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. . The information developed will be used in decision support tools that will assist transit providers to evaluate the current condition of their assets, project future asset condition, and prioritize investment in order to meet targets and improve the state of good repair of their capital assets.

Once developed, the TAM Plan, which must be updated at least every four years, will help agencies to identify and prioritize investments to efficiently manage their assets, as well as assess risks that may impact safety and operational performance. The annual data progress report will help each transit provider assess the progress made towards achieving the target set previously, and identify factors which may have contributed towards their failure to achieve the target. This also will help them to identify factors that contribute to achieving the performance targets, resulting in an improved understanding of the actions and outcomes. In addition, the TAM Plan and the narrative reports can be used by transit providers to inform the public and State legislators of the providers' plans and progress towards the

¹ The term "designated recipient" is defined in statute as "(A) an entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of \$200,000 or more in population; or (B) a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation." 49 U.S.C. 5302(4).

performance targets. This will increase transparency and accountability of the use of public funds. The annual narrative report will inform FTA and contribute to the five year report to Congress on the outcomes of implementing a TAM System and provide insights into what issues still need to be addressed to achieve a state of good repair for the Nation's transit assets.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The final rule does not require that a TAM be electronic, however a transit provider may choose to develop its TAM Plan with computing software, such as Microsoft word or excel, and graphical software. FTA will verify compliance with the TAM Plan requirements during the Triennial or State Management review process, which are FTA's existing audit processes. The annual narrative report, performance targets, and the asset condition report will be submitted electronically to the National Transit Database (NTD) every year. The performance targets will be included in the narrative report. The cost to FTA of collecting this information will be included in another PRA submission for NTD (National Transit Database Asset Inventory Module 49 U.S.C. Section 5335(c)).

TAM must include analytical tools to analyze the data to develop project priority lists, and performance measures and targets. Analytical tools can be developed with readily available off-the shelf software such as Microsoft Excel. Transit providers also may choose to purchase software depending on the provider's needs. In addition, transit providers may use FTA's TERM-Lite model free of charge.

4. Describe efforts to identify duplication.

FTA has taken several steps to gather information from the transit industry to develop the final TAM rule. In December 2012, FTA hosted an on-line dialogue. In October 2013, FTA published an Advance Notice of Proposed Rulemaking (ANPRM). The ANPRM posed 123 questions regarding the current processes and procedures for conducting asset management and safety analysis at transit agencies; in addition the ANPRM sought recommendations from the industry on their preferences on implementing the new safety and

TAM requirements. Finally, on September 30, 2015 FTA published a Notice of Proposed Rulemaking (NPRM) 80 FR 58911.

Each occasion provided an opportunity to highlight any potential duplication in the requirements and what may be required elsewhere. However, in general, the final rule does not prescribe how a transit provide must comply with the rule's requirements. For example, the final rule does not require that transit providers use a particular data source, what decisions support tools to use, or how to format the narrative report. FTA does not expect transit providers to duplicate existing process they may have in order to satisfy the requirements in the final rule.

Also, during the development of the final rule, FTA reviewed existing research and practitioner resources that reviewed existing state-of-the-practice for transit agencies with regard to TAM approaches and data collection methodologies. Some of these resources included, pilot project reports, National and international assessments, and responses to an FTA's online dialogues. The data identified by the industry align with the data that the final rule requires to be collected.

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

To minimize burden on small transit service providers, recipients are categorized into two tiers, with fewer requirements for the smaller transit service providers. The smaller entities are classified as Tier II providers meaning a recipient that owns, operates, or manages (1) one hundred (100) or fewer vehicles in revenue service during peak regular service across all non-rail fixed route modes or in any one non-fixed route mode, (2) a subrecipient under the 5311 Rural Area Formula Program, (3) or any American Indian tribe. . These recipients have the option of participating in a Group TAM Plan that is developed by a direct recipient such as a State or other designated recipient. Tier II providers are only required to develop a less burdensome TAM Plan by excluding the requirements for identifying policies and strategies to achieve transit asset management; strategies for implementation of the TAM Plan; a list of key activities to achieve asset goals; identification of financial resources to meet the asset management goals; and a plan for continuous improvement.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

A less than annual reporting of this information would not be sufficient to know the condition of transit revenue vehicle fleet. This information is used for estimating the future transit investment needs reported in the congressionally mandated biennial Condition and Performance Report produced by U.S.DOT. For some assets, such as stations and facilities, the condition data will be collected every three years. In addition FTA is not collecting condition data for any assets that transit providers do not have direct capital responsibility for. If asset condition reporting occurred less frequently, the value derived from a better understanding of changes in asset condition would be compromised by limiting the ability to understand trends overtime. FTA would use annual reporting of SGR performance targets to identify what each transit provider is planning to achieve each year and measure an individual transit provider's progress towards meeting SGR.

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

The information collection fully applies with 5 CFR 1320.6

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

FTA issued an NPRM to solicit comment from the public on the proposed TAM rulemaking to implement MAP-21 legislation for the Public Transportation Asset Management System codified at 49 U.S.C. 5326.

FTA received a total of 119 public comments on the NPRM. The comments and FTA responses are summarized in the final rule under each of the relevant sections to which the comment pertained. The comments on the PRA and the burden estimates presented in the NPRM are under section III: Regulatory Analyses and Notices. Transit Asset Management; National Transit Database (Docket No. FTA-2014-0020). Those comments have been included under the supplementary section of this information collection

request.

FTA made revisions to the burden estimates for the Paperwork Reduction Act analysis of the final rule in response to these comments. The revisions include: increasing the labor rate for the analytical processes and project prioritization task for tier II providers from \$23.04 to \$40.25, increasing the number of hours for asset inventory task by 96 hours for the first 2 years and 36 hours thereafter. FTA also added costs for information technology support of TAM plan development in the amount of \$5,000 per plan. The number of 5310 providers was reduced due to policy changes (requiring TAM plans only from those agencies providing open door public transit service) and availability of new data. FTA updated the wage rates based on May 2015 Bureau of Labor Statistics (BLS) data for urban transit systems and interurban and rural bus transportation.² Finally, FTA developed a higher-cost case that assumes contractor support at costs that were roughly two times the fully loaded in-house costs.³

During the NPRM comment period, FTA engaged in stakeholder outreach including, a webinar series with approximately 700 total attendees to inform and educate transit providers of the TAM provisions proposed. Specifically, the webinar series sought to engage small system providers, including Native American tribes, in an exclusive webinar for small systems. In addition, FTA provided three in-person presentations at industry conferences with approximately 100 total attendees. FTA also conducted informal presentations at workgroup and association meetings. FTA will continue to provide outreach to stakeholders after the final rule has been published with multi-part webinar series that will provide technical assistance to the transit industry on how to implement the rule.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift is made to respondents.

² Bureau of Labor Statistics. May 2015. http://www.bls.gov/oes/current/naics3_485000.htm.
http://www.bls.gov/oes/current/naics3_485000.htm

³ This cost factor was based on two sources of information. Federal Highway Administration collected data on the cost of developing highway asset management plans from 9 States, with preliminary findings showing the contractor support to cost in the range of 1.5 to 1.6 times as much as in-house efforts. A 2013 research report from the Project on Government Oversight study, while focused on the Federal government rather than state and local agencies, found that contractors were paid 1.8 times more than federal employees for similar work.
[www.pogo.org/our-work/reports/2011/co-gp-20110913.html#Executive Summary](http://www.pogo.org/our-work/reports/2011/co-gp-20110913.html#Executive%20Summary)

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

Respondents are not provided any assurance of confidentiality. The data is used for determining eligibility for receipt of grant funds and compliance with statutory requirements.

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.

The documents do not require any information of a sensitive nature such as sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. None of the information required is of a personal nature.

12. Provide an estimate in hours of the burden of the collection of information.

Low Cost/Base Case:

Total Annual Respondents: 2,998 (284 Tier I + 2,714 Tier II)

Total Annual Responses: 1,038 (284 Tier I + 754 Tier II)

Total Annual Burden Hours: 518,037 (210,480 Tier I + 307,557 Tier II)

Total Annual Burden Cost: \$26,173,415 (\$11,439,750 Tier I + \$14,733,665 Tier II)

High Cost Case:

Total Annual Respondents, Responses, and Burden Hours are unchanged.

Total Annual Burden Cost: \$50,617,455 (\$22,406,792 Tier I + 28,210,663 Tier II)

The initial costs for establishing new processes for collecting asset condition data, developing analytical processes, performance measures and targets, and reporting will be higher than the subsequent annual, triennial and quadrennial updates and will be incurred over a period of two years.

Estimated Total Annual Number of Respondents and Responses:

Tier I:

There are 284 Tier I providers. These are direct/individual transit providers that submit one Transit Asset Management Plan for a total of 284 plans/responses on an annual basis.

Tier II:

There are 2,714 Tier II providers. Of the 2,714 transit providers, only 754 TAM Plans/responses are actually developed on an annual basis [490 (Individual Plans) + 264 (Group Plans)] because FTA anticipates that many designated recipients will develop Group TAM Plans for their subrecipients which includes data for all of its subrecipients. Accordingly, a Group TAM Plan Sponsor (designated recipient) would submit one data report and one narrative report on behalf of all of the Group TAM Plan participants (subrecipients).

Estimated Total Annual Burden Hours and Cost:

Tier I:

FTA estimates that the initial hours of burden for Tier I providers during the first two years is 431,424 hours. Once a TAM Plan has been developed and implemented, the hours of burden in Year 3 and all subsequent years would decline to approximately 200,015 annual hours. Therefore, the total annual burden hours associated with this information collection for Tier I providers is 210,480 hours [431,424 (Year 1&2) + 200,015 (Year 3+) = 631,439/3].

For the low cost case, FTA estimates that the initial cost of this information collection during the first two years is \$24,449,578. Once a TAM Plan has been developed and implemented, the cost of this information collection in Year 3 and all subsequent years would decline to approximately \$9,869,673. Therefore, the total annual burden cost associated with this information collection for Tier I providers is \$11,439,750 [\$24,449,578 (Year 1&2) + \$9,869,673 (Year 3) = \$34,319,251/3]. For the high case, FTA estimates that the initial cost will be approximately \$47,481,030 and the subsequent costs will be approximately \$19,739,346. This leads to a total annual burden cost of approximately \$22,406,792.

Tier II:

FTA estimates that the initial hours of burden for Tier II providers during the first two years is 679,166 hours. Once a Tam Plan has been developed and implemented, the hours of burden in Year 3 and all subsequent years would decline to approximately 243,504 hours. Therefore, the total annual burden hours associated with this information collection for Tier II providers is 307,557 hours [679,166 (Year 1&2) + 243,504 (Year 3+) = 922,670/3].

For the low cost case, FTA estimates that the initial cost of this information collection during the first two years is \$33,623,673. Once a TAM Plan has

been developed and implemented, the cost of this information collection in Year 3 and all subsequent years would decline to approximately \$10,577,321. Therefore, the total annual burden cost associated with this information collection for Tier II providers is \$14,733,665 [$\$33,623,673$ (Year 1&2) + $\$10,577,321$ (Year 3+) = $\$44,200,994/3$]. For the high cost case, FTA estimates that the initial cost will be approximately \$63,477,346 and the subsequent costs will be approximately \$21,154,643. This leads to a total annual burden cost of approximately \$28,210,663.

Tables 1 and 2 below show the hours of burden and the dollar cost to the Tier I and Tier II incurred by transit providers in the first three years of implementing the TAM Rule. For the low cost case. For The tables show the assumptions made for the level of effort and the loaded wage rates (wage rate adjusted to account for employer cost of fringe benefits)⁴ used for estimating the hours of burden and the cost of implementing the Rule. For the high cost case, labor rates are two times higher as described under question 8 above. The costs are calculated in the same manner and total costs are presented immediately above in this section.

As the tables below indicates, agencies have a two year period in which to develop their TAM plan, which includes the initial asset inventory, condition assessment, and other activities as listed in the table. The burden hours and costs for the initial plan development are presented for the two year period as a whole.

Then, starting in year three, agencies must maintain and update their TAM plans. Some of the associated activities must be repeated every year (e.g. vehicle condition assessment, way miles condition assessment, etc.). Thus, for these items, the cost for year three may be the same as for the initial two-year period, because the same activity that was performed over two years as part of the initial plan development must be done on an annual basis with the same level of effort. In other cases, such as the asset inventory, it was assumed that the initial activity would require more labor hours during year one and two. However, the level of effort decreases in subsequent years as the grantee has becomes familiar with performing this activity. The details of these assumptions are laid out in the Regulatory Impact Analysis document on the docket.

⁴ BLS data show wages as 64.1% of total compensation, with benefits at 35.9%. Therefore, employees' wages are factored by 1.56 (100 / 64.1) to account for employer provided benefits.

The proposed rule also calls for some other activities to be repeated less than annually, such as every three years (e.g., condition assessment for stations and facilities) or every four years. In those cases, the reported burden hours and costs for “Year 3” in the table actually represent an annualized average – i.e., the total estimated cost of the activity divided by the number of years in the cycle.

A few activities, such as Recordkeeping and Group Plan coordination, are listed as “not applicable” for the initial two-year period because they are designed to capture the additional ongoing costs associated with maintaining and updating the TAM plan once it is already in place beginning in year three. Costs for developing the initial plan are covered by the other items as listed.

Table 1: Tier I Operators (More Than 100 Vehicles and Rail Fixed Guideway)

Item	Labor Rate (\$/hr) Urban	Initial (First Two years) Costs	Year 3 Cost	Initial Hours of Burden (Two years)	Third Year Hours of Burden
	(May 2015 BLS Statistic)				
Vehicle Condition Assessment	\$45.15	\$2,629,146	\$2,629,146	58,236	58,236
Station Condition Assessment	\$37.66	\$1,263,816	\$421,272	33,560	11,187
Maintenance Facilities Condition Assessment	\$37.66	\$643,446	\$214,482	17,086	5,695
Way Miles (open) Condition Assessment	\$69.64	\$443,792	\$443,792	6,373	6,373
Tunnel, Bridge and Transitions Condition Assessment	\$69.64	\$178,511	\$178,511	2,563	2,563
Asset Inventory	\$45.15	\$1,229,246	\$460,967	27,228	10,211
Analytical Processes	\$45.15	\$6,658,417	\$2,663,367	147,485	58,994
Prioritized Project List	\$45.15	\$1,229,246	\$460,967	27,228	10,211

Plan Strategy	\$87.14	\$2,372,691	\$494,311	27,228	5,673
Performance Measures and Targets	\$87.14	\$5,140,832	\$889,759	58,994	10,211
NTD Reporting	\$47.95	\$893,655	\$446,828	18,636	9,318
Narrative Report Writing	\$47.95	\$299,223	\$244,819	6,240	5,105
Narrative Report Review	\$87.14	\$49,431	\$49,431	567	567
Recordkeeping	\$47.95	N/A	\$272,021	N/A	5,673
IT Costs	N/A	\$1,418,125	\$0	N/A	N/A
Total Annual Dollar Cost and Hours of Burden		\$24,449,578	\$9,869,673	431,424	200,015

Table 2: Tier II Operators (100 Vehicles or Less and No Rail Fixed Guideway)

Item	Labor Rate (\$/hr) Urban	Initial Costs (Two years)	Third Year Cost	Initial Hours of Burden (Two years)	Third Year Hours of Burden
	(May 2015 BLS Statistic)				
Vehicle Condition Assessment	\$21.61	\$679,055	\$679,055	31,429	31,429
Station Condition Assessment	\$35.52	\$234,100	\$78,033	6,576	2,192
Maintenance Facilities Condition Assessment	\$35.52	\$778,626	\$259,542	21,872	7,291
Asset Inventory	\$41.98	\$3,038,651	\$1,139,494	72,384	27,144
Analytical Processes	\$41.98	\$16,459,362	\$3,291,872	392,080	78,416
Prioritized Project List	\$41.98	\$3,038,651	\$759,663	72,384	18,096

Performance Measures and Targets	\$76.99	\$4,643,796	\$1,393,139	60,320	18,096
NTD Reporting	\$41.98	\$422,201	\$211,100	10,057	5,029
Narrative Report writing	\$41.98	\$443,137	\$189,916	10,556	4,524
Narrative Report Review	\$76.99	\$116,095	\$116,095	1,508	1,508
Group Plan Coordination (Bus.Op. Specialist)	\$41.98	N/A	\$1,329,914	N/A	31,680
Group Plan Coordination (General Manager)	\$76.99	N/A	\$812,972	N/A	10,560
Record keeping	\$41.98	N/A	\$316,526.18	N/A	7,540
IT Costs	N/A	\$3,770,000	\$0	N/A	N/A
Total Initial and Recurring Average Annual Dollar Cost and Hours of Burden		\$33,623,673	\$10,577,321	679,166	243,504

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

FTA estimates no other costs to respondents other than the costs associated with the paperwork burden hours shown in item #12 above (which are not to be included in item #13). There are no capital/start-up costs or operation/maintenance costs associated with the information collection burden.

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

To support the final rule, FTA will provide technical assistance to the transit industry to implement the new requirements, and training for FTA employees to implement the new TAM system. FTA estimates that it will incur an annual cost of \$2 million to cover the cost to implement the TAM Rule. This will cover the costs to develop guidance and training materials; provide training and to pay for FTA program management staff. This is based on current FTA cost for research, stakeholder outreach and staffing costs since the MAP-21 Reauthorization Act. It is likely that the FTA costs will decline over time as the program matures and asset management becomes an integral part of

transit agencies' project prioritization practice. FTA has assumed that after the first five years, the costs will fall to \$1.5 million, then \$1 million after 10 years and to \$0.5 million after fifteen years.

There will be additional costs to the Federal government to collect, analyze and publish the new data requested under this Rule. These costs will be covered by another PRA request for National Transit Database (OMB #2132-0008) under development.

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

FTA made revisions to the burden estimates for the Paperwork Reduction Act analysis of the final rule in response to comments received during the NPRM process. The revisions include: increasing the labor rate for the analytical processes and project prioritization task for tier II providers from \$23.04 to \$41.98 (also reflecting the update to May 2015 BLS data), increasing the number of hours for asset inventory task by 96 hours for the first 2 years and 36 hours thereafter. FTA also added costs for information technology support of TAM plan development in the amount of \$5,000 per plan. In addition, the total annual number of respondents was reduced from 3,998 to 2,998 due to policy changes and availability of new data. Finally, FTA incorporated a high cost case estimate to account for the potentially higher labor rates if contractors conduct the work required to meet the requirements of the rule. The total annual burden costs for the high case, and the underlying rationale, are explained under questions 8 and 12 above.

16. For collections whose results will be published, outline the plans for tabulation and publication.

FTA will tabulate the data and make it available to the public through the National Transit Database website. FTA has not identified the exact details of this effort. Tabulation and publication will be covered in the PRA for NTD (National Transit Database Asset Inventory Module 49 U.S.C. Section 5335(c)).

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

FTA is not seeking approval to the exception.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.