Supporting Statement for Information Collection Request
Revision to OMB Control No. 2127-0626 (Current Expiration Date: 8/31/18)

Tire Pressure Monitoring System – Outage Rates and Repair Costs (TPMS-ORRC)
Revised Field Survey

Part A

National Highway Traffic Safety Administration

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SUPPORTING STATEMENT A

Tire Pressure Monitoring System – Outage Rates and Repair Costs (TPMS-ORRC)
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A. Justification

Summary: Responding to this collection is voluntary. The collection is reporting and is a survey. The collection will be done as a one-time only survey. The information that would be reported, maintained in records, and disclosed is information collected about status of passenger vehicle tire pressure monitoring systems malfunction, in some cases tire pressure and calibration, and answers to questions on consumer experience, knowledge, and value of tire pressure monitoring systems. Information collected would be received by the National Highway Traffic Safety Administration with eventual public reporting of survey results, and data release of non-identifiable data. The purpose of the survey is to inform an evaluation of tire pressure monitoring systems, which were mandated by Federal Motor Vehicle Safety Standard 138, and to provide information as background to additional rulemaking mandated in the Fixing America's Surface Transportation (FAST) Act. The survey was previously approved as a component of OMB Control No. 2127-0626 (current expiration Date: 8/31/18), but this component has not yet been conducted. The study design is being revised to redesign the sample as a national probability sample (replacing the former planned convenience sample), and add a survey module for vehicles with indirect tire pressure monitoring systems, which are a certain type of tire pressure monitoring systems that work differently than direct systems. These changes are requested to improve the survey's ability to help inform the rulemaking mandated in the FAST Act.

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 necessitating the data collection.

This request is a revision to a previously approved ICR, OMB Control No. 2127-0626 (current expiration date 8/31/17). Improperly inflated tires pose a safety risk, increasing the chance of skidding, hydroplaning, longer stopping distances, and crashes due to flat tires and blowouts. Section 13 of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act (Attachment A1), which Congress passed on November 1, 2000, directed NHTSA to conduct rulemaking actions to revise and update the Federal motor vehicle safety standards for tires, to improve labeling on tires, and to require a system in new motor vehicles that warns the operator when a tire is significantly underinflated. Tire Pressure Monitoring Systems (TPMS) were mandated in Federal Motor Vehicle Safety Standard (FMVSS) No. 138 (Attachment A2), so that drivers are warned when the pressure in one or more of the vehicle's tires has fallen to 25 percent or more below the placard pressure, or a minimum level of pressure specified in the standard, whichever pressure is higher, and may be informed about which of the four tires is underinflated. As of September 1, 2007, after a phase-in period beginning on October 5, 2005, TPMS was required on all new light vehicles (i.e., passenger cars, trucks, multipurpose

passenger vehicles, and buses with a gross vehicle weight rating of 10,000 pounds or less, except those vehicles with dual wheels on an axle).

Executive Order 13563 (Attachment A3) requires Federal agencies to evaluate their existing regulations and programs and measure their effectiveness in achieving their objectives. Since the phase-in of TPMS, there has been only one evaluation of TPMS. The TPMS-SS (OMB #2127-0626) was conducted in 2011, as a special study through the infrastructure of the National Automotive Sampling System (NASS), to collect nationally representative data on how effective TPMS was in reducing underinflation in the on-road fleet of passenger vehicles. Analysis of the survey results indicated that direct TPMS is 55.6-percent effective at preventing severe underinflation as defined in FMVSS No. 138. However, effectiveness was substantially lower in vehicles that were 6-7 years old at the time of the survey. One explanation as to why this is true was the possibility that the drivers of these older vehicles were not taking all the maintenance actions (e.g., adding TPMS sensors to new vehicle tires, replacing non-functioning sensors on current tires, having the system properly re-set when needed) that were needed in order to insure that they had functioning TPMS. Relevant data are needed to examine why the effectiveness of TPMS in older vehicles is reduced and what can be done to increase it.

Additionally, on December 4, 2015, the Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94) was signed into law. An amendment (Section 24115) directs the Secretary of Transportation to update FMVSS No. 138 to ensure that TPMS cannot be overridden, reset or recalibrated in a way that will prevent the system from identifying a tire that is significantly underinflated. The Act also states that the revised requirements shall not contain any provision that has the effect of prohibiting the availability of direct or indirect tire pressure monitoring systems. Data from the TPMS-ORRC will provide information about TPMS recalibrations gathered from responsible drivers and their vehicles, to help inform the rulemaking requirement.

b. Statute authorizing the collection of information.

The National Traffic and Motor Vehicle Safety Act of 1966, re-codified under Title 49 of the United States Code, Chapter 301, Subchapter V, Section 30181, gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections of this title. (See Attachment A1 for full text.)

The Highway Safety Act of 1966 (P.L. 89-564), re-codified under Title 23 of the United States Code, Chapter 4, Section 403, gives the Secretary authorization to use funds appropriated to carry out this section to conduct research and development activities on all aspects of highway and traffic safety systems and conditions relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics. Section 403 further gives the Secretary authorization to conduct research and development activities with respect to human behavioral factors and their effect on highway traffic safety. Section 403 also authorizes the Secretary to conduct an evaluation of the effectiveness of countermeasures to increase highway and traffic safety. (See Attachment A2 for full text.)

Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Section 13, directs NHTSA to conduct rulemaking actions to revise and update the Federal motor vehicle safety standards to require a system in new motor vehicles that warns the operator when a tire is significantly underinflated. (See Attachment A3 for full text.)

Federal Motor Vehicle Safety Standard (FMVSS) No. 138 mandates Tire Pressure Monitoring Systems (TPMS). (See Attachment A4 for full text.)

Executive Order 13563 requires Federal agencies to periodically review their existing significant regulations to determine whether any such regulations should be modified, streamlined, expanded, or repealed so as to make the agency's regulatory program more effective or less burdensome in achieving the regulatory objectives. (See Attachment A5 for full text.)

The Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94) (Section 24115) directs the Secretary of Transportation to update the standard on tire pressure monitoring systems, FMVSS No. 138, to ensure that they cannot be overridden, reset or recalibrated in a way that will prevent the system from identifying a tire that is significantly underinflated. The Act also states that the revised requirements shall not contain any provision that has the effect of prohibiting the availability of direct or indirect tire pressure monitoring systems. (See Attachment A6 for full text.)

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 agency used information obtained from the 2001 Tire Pressure Special Study (TPSS) and the 2003 Tire Pressure Monitoring System Study (TPMSS) in developing Federal Motor Vehicle Safety Standard (FMVSS) No. 138, which mandates Tire Pressure Monitoring Systems (TPMS) in all new light vehicles. NHTSA staff analyzed the nationally representative 2011 TPMS-SS survey data (i.e., data on tire inflation for vehicles with and without TPMS) to evaluate the effectiveness of TPMS in preventing under-inflated tires. TPMS effectiveness was seen to decrease in older vehicles, but the reason for this decrease could not be determined from the data collected. Information from this survey will be used to understand TPMS malfunction as it relates to vehicle age, understand the reasons drivers do or do not keep their TPMS in good functioning order, understand calibration issues with TPMS, and assess the usefulness of providing consumers with additional information on TPMS.

In the previously approved and conducted TPMS-ORRC Suppliers Survey, twelve major suppliers of TPMS sensors and systems provided responses by email with focus on TPMS repair and maintenance issues, as well as cost factors. In the previously approved and conducted TPMS-ORRC Repair Facilities Survey, 100 repair/maintenance facilities (e.g., automobile dealerships, tire chain stores, small service stations with attached repair shops) were administered a Computer-Assisted Telephone Interview (CATI) or mail interview with focus on the lifespan of TPMS, common sources of TPMS malfunction, typical costs to repair/replace malfunctioning systems, and the factors considered by customers when deciding whether to repair or replace TPMS that are not working. Results of these two surveys will be summarized as part of the overall TPMS-ORRC study report.

The current request revises the previously approved TPMS-ORRC Field Survey, which has not been conducted. The Field Survey had originally been designed as a purposively selected convenience sample survey. The revision changes to a probability sample to allow nationally representative estimation. It also adds a special module for indirect TPMS (about five to six

percent of the relevant fleet) that will include tire pressure reading and brief questions about calibration. The model year range will start at 2006, which is the year the FMVSS 138 phase-in began, and only drivers in vehicles that are compliant to FMVSS 138 will be asked to participate; conducting the survey in 2018 allows us the ability to have a long enough range of vehicle model years in the updated scope.

Survey Forms for the revised Field Survey of Drivers and Vehicles. The forms are similar to the previously approved study. Two forms will be used to obtain information regarding vehicle characteristics, and driver knowledge:

> *Vehicle Inspection form* will be completed via observation by one data collector while another data collector conducts an in-person interview with the driver. The Vehicle Inspection form will be used to record information about the vehicle make, model, odometer reading, tire valves condition, and TPMS status, and in the case of indirect TPMS, will involve taking the tire pressure.
>
> *Driver Interview form* will be completed by the interviewing team member. The first part is a screener for the drivers of all vehicles that are approached, to determine eligibility to join the survey. Eligible drivers' interview will depend on which group they fall into: Subgroup 1 - eligible drivers of population vehicles with direct TPMS where the TPMS is currently malfunctioning. These drivers will be administered a brief set of qualitative questions about the malfunction status. Subgroup 2 - eligible drivers of population vehicles with direct TPMS where the TPMS is currently functioning (as evidenced by the malfunction light or the combined low inflation pressure/malfunction light not being illuminated or not signaling a malfunction). They will be asked a few core questions. A subset of these drivers will be administered a brief extended interview with added qualitative questions about TPMS knowledge and behavior. Subgroup 3 - eligible drivers of population vehicles that have indirect TPMS. Drivers in this group will be administered a brief interview pertaining to knowledge about calibration and the result of their tire pressure check.

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 forms of information technology. Also describe any consideration of using information technology to reduce burden.

The Field Survey will use electronic methods of collecting data from on-site, in-person interviews and vehicle inspections. Data will be collected through the use of hand-held electronic tablet devices. There are a number of benefits to using hand-held electronic devices. Certain type of errors that are more likely to happen when data collection is done manually by interviewers (e.g., not following the correct sequencing or skip pattern of questions, accepting invalid responses or data entries) are eliminated or greatly reduced, at the same time that interview time/ burden for the respondents is reduced. Also, data is entered directly into the computer's memory, eliminating the need for a later labor intensive data entry process that can introduce additional errors. Finally, survey supervisors have complete and immediate data with

which to track the progress of the data collection process and the quality of the data being collected.

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 has conducted three studies about TPMS. The first of these was conducted in 2001, but the study sample included too few vehicles equipped with tire pressure monitoring systems to perform a thorough analysis. A second study was begun in 2003 but was truncated. The third study (i.e., TPMS-SS) was conducted in 2011 to collect data on tire pressure and TPMSs. It also obtained data on consumers' knowledge and habits (e.g., how properly functioning TPMSs worked, how and when to add air to vehicle tires); however, almost all of this data was collected about the drivers' actions toward working TPMS systems and not about their actions toward non-functioning systems. In addition, data on the cost and difficulty in replacing/repairing non-functioning systems was not collected.

NHTSA has also completed Internet searches for studies on consumers' reactions to the non-functioning of their TPMSs, but has not found any studies that address this topic. J.D. Power and Associates, through its independently funded surveys, has been providing information on dealer attitudes and customer satisfaction since the 1970s. In 2010, they conducted a survey about tires and TPMS, but the released survey data did not include information about consumers' reactions to non-functioning TPMS. Overseas, TNS Sifo, a Swedish company that conducts opinion polls and other social research, conducted a survey of Swedish drivers for NIRA Dynamics, a Swedish manufacturer of indirect TPMSs. The results of the survey were presented in a PowerPoint presentation entitled, "Tire Pressure and TMPS Consumer Practice," which was given at the Vehicle Dynamics Expo 2012 on June 13. While the survey did not explicitly cover the non-functioning of TPMS, it did cover related topics (i.e., drivers' knowledge about TPMS and willingness to spend funds on buying and maintaining them); however, since only Swedish drivers were interviewed, one cannot be certain that American drivers would have the same knowledge and opinions.

The completed TPMS-ORRC Suppliers Survey and Repair Facilities Survey engaged suppliers and professional establishments involved in TPMS repair. This component collection will supplement those with a more comprehensive investigation of TPMS systems by engaging the general public, to answer key questions about the operational status of TPMS systems, consumers' attendant knowledge, attitudes, and awareness of TPMS systems.

FMVSS 138 only became fully required in model year 2008, and compliant indirect systems only started to appear in model year 2009. At the time of the expected revised Field Survey in 2017, enough compliant vehicles will be on the road to allow a survey of TPMS malfunction over time, and to allow a small survey of vehicles with indirect systems. The earlier years' data do not have these features. Neither the evaluation of malfunction over time, nor information to inform a possible rulemaking, could be serviced by the earlier data.

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

Revised Field Survey of Drivers and Vehicles. The collection of information for the revised field survey of drivers and vehicles involves drivers of selected vehicle types, not small businesses. Potential survey sites, which will be fueling stations, will be contacted in advance for voluntary permission to conduct the survey at their establishment. These businesses will be fully informed as to the nature of the survey operations, as well as the amount of time required for the data collection activities. The burden will be spread across a group of fueling stations over a short period of time so that the burden on any single station is minimized.

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.

FMVSS 138 mandated that all light vehicles have TPMS (and a malfunction indicator) by November 2007 (model year 2008), with a phase in in model years 2006 and 2007; therefore, the initial vehicles required to have TPMS will be twelve years old in 2018. The Agency does not have any hard data as to the exact life of the batteries that are used in the TPMS, but it has been estimated that batteries will begin to fail in about eight years. The agency requires data about what to expect in the next few years as more and more of the TPMS batteries fail (e.g., the extent of the problem, how consumers will react to this problem, possible Agency actions that could be taken to diminish any problems that develop). NHTSA knows of no previous study that evaluates the effects of non-functioning TPMSs upon consumers' ability to track tire inflation with their TPMSs. Consequently, if this study is not conducted, real-world data to evaluate the effect of non-functioning TPMSs on Federal Motor Vehicle Safety Standard (FMVSS) 138 would not be available. In addition, if NHTSA does not collect this information, it will not have scientifically-based information from actual motorists on the use of TPMS with which to better target Agency outreach efforts. Lastly, the FAST Act has provisions for an updated rulemaking on TPMS, and without the revised Field Survey, nationally representative data would not be available to help provide information to the potential rulemaking process.

A.7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines set forth in 5 CFR 1320.6.

There are no circumstances requiring information to be collected in a manner inconsistent with the guidelines in 5 CFR 1320.6.

A.8. 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 prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the agency to obtain their views.

FEDERAL REGISTER NOTICES: The 60-day public notice was published in the Federal Register, Vol. 81, No. 245, December 21, 2016, pp. 93728-93730, and is provided in Attachment B1. No comments were received. The 30-day public notice was published in the Federal Register, Vol. 82, No. 78, April 25, 2016, pp. 19138-19139, and is provided in Attachment B1.

A.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 made to respondents in the survey. We plan to offer all participating drivers a check on open recalls for their vehicle via NHTSA's SaferCar.gov web site, and if there is no internet connection, we will distribute wallet cards with instructions on how to access the information, but there is no monetary value to these incentives.

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

In a letter handed to on-site respondents in the Field Survey, we will promise that the data will be kept private, used only for statistical purposes, and protected to the full extent of the law. We do not have a statute that expressly guarantees confidentiality for most of the data that we are collecting in the TPMS-ORRC.

A.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 survey does not contain any questions related to matters that are commonly considered sensitive or private. We will conduct a scan or manual entry of the Vehicle Identification Number to determine vehicle characteristics for eligibility, but we will only retain into the database the characters that are general vehicle descriptors (the first eleven characters), not the characters that identify the individual vehicles (the last six characters).

A.12. Provide estimates of the hour burden of the collection of information on the respondents. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Field Survey of Drivers and Vehicles. Of the two forms used, only the Driver Interview Form will place burden on the respondents (the vehicles' drivers). The Vehicle Inspection Form does not place burden on the respondents, as it is completed via observation. One data collector will conduct an in-person interview with the drivers to collect information on the Drivers Interview Form, while the other data collector will complete the Vehicle Inspection Form via observation.

A pilot study for the previously approved version of the survey was conducted in Suffolk County, New York before the revision was planned. There, 112 drivers were approached, of whom 95 agreed to interviews, for a cooperation rate of 85 percent. Results found 80 vehicles with TPMS functioning and the low pressure light not on (84%), 5 vehicles with TPMS

functioning and the low pressure light on (5%), 9 vehicles with TPMS malfunctioning (9.5%), and 1 vehicle with no evidence of TPMS in the vehicle (1%). For the pilot, most interviews were administered as extended interviews, each lasting about 10-15 minutes.

For our Field Survey burden estimate, we assume a full sample size of 6,300 completed interviews distributed as 4,365 base interviews and 1,935 extended interviews. For an interview to be considered complete, a participant must be screened in (i.e., the vehicle is in scope and the driver is the responsible party) and not drop out before completing the interview. To estimate the screen-in rate we note that our universe size (in 2016) of 136,000,000 passenger vehicles eligible for our study (details in Part B) represents 51 percent of the fleet of all passenger vehicles in 2016 (266,900,000)[1]. We will not approach vehicles obviously older than MY 2006; however, if we estimate approaching vehicles of MY 2000 and later, our fleet of passenger vehicles approached is 220,800,000. After allowing for drivers of vehicles not responsible for upkeep, the estimated eligibility rate is 60 percent. Based on our pilot we estimate a 15 percent dropout rate. In the pilot, the observed malfunction rate (subgroup 1, extended interviews) was 9.5 percent, but since we want to administer an extended interview to as many malfunctions as we encounter, we use an estimate of 15 percent malfunction (945 cases) to allow enough burden hours. For indirect TPMS (subgroup 3, extended interviews) we estimate about 5 percent of in-scope vehicles based on registration information but due to their increased importance to the study, we will seek them out at stations with higher priority. We estimate 10 percent of vehicles (630 cases) entering the study will be in subgroup 3. We plan 350 extended interviews for subgroup 2, but for burden estimation we are assuming 360 to allow for minor overages across the 24 PSUs. Thus our burden estimate for completed extended interviews is 945+360+630 = 1,935 and for completed base interviews is 6300-1,935 = 4,365. Since we have revised forms and a new module for indirect TPMS, we request a new pilot to conducted to test and revise data collection procedures and instruments. In it, we will test 100 cases in any of the three subgroups, and to be conservative in burden we plan them all as extended interviews. Based on our pilot, we estimate an average extended interview length of 12.5 minutes and an average base interview length of eight minutes. Overall, we estimate screening 12,353 drivers for a burden of 1176 hours as follows:

ESTIMATE OF REPORTING BURDEN
Revised Field Survey

1 Registered passenger vehicles includes content furnished under license to the U.S. Department of Transportation, and subject to restrictions on disclosure, by R.L. Polk & Co. Polk data are a foundation of IHS Markit automotive solutions;

	Estimated Number of Approaches (A)	Minutes per Contact (B)	Total Minutes (A)*(B)=(C)	Burden Hours (C)/60=(D)
Screened	12353 (a)			
Screen out (ineligible veh. or driver) (a)*(.40)	4941 (b)	1.5	7412	124
Screen in but drop out (a-b)*(.15)	1112 (c)	2.5	2779	46
Complete interviews (a-b-c)	6300 (d)			
Extended interviews (945 subgrp 1, 360 subgrp 2, 630 subgrp 3)	1935 (e)	12.5	24188	403
Basic interviews (d-e)	4365	8	34920	582
Pilot and Test	100	12.5	1250	21

ESTIMATE OF REPORTING BURDEN	
TOTAL BURDEN HOURS (L)	1,176
AVERAGE COST PER HOUR (M)	$23.23
COST ASSOCIATED WITH BURDEN HOURS (L)*(M)	$27,314

Cost. The overall burden hours for the revised Field Survey are estimated to be 1,176 hours as shown above. If the cost to the respondents of their voluntary hours is looked at in terms of an hourly wage based upon the average income level in the United States, the Mean Hourly Wage Estimate of $23.23 per hour (U.S. Dept. of Labor, Bureau of Labor Statistics, 2015, from http://www.bls.gov/oes/current/oes_nat.htmmate for May 2015) can be used to estimate costs to respondents at $27,314.

A.13. Provide an estimate of the total annual [non-hour] cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no costs to respondents or record keepers associated with participating in this survey. For the driver interview, respondents will be asked questions regarding their TPMS, and all responses will be provided spontaneously. For the vehicle inspection, data will be obtained via observation.

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

The total estimated cost to the government for conducting the TPMS-ORRC Field Survey is as follows:

Number of completed interviews	6300
Total estimated cost of conducting Field Survey	$1,291,947
Cost per completed interview	$205.07

The total estimated cost is the contracted amount budgeted by the contractor to the revised Field Survey. Costs of the survey are over a five-year period from award to completion, reflecting extension of work due to the revision, so annualized costs are $258,389 over five years.

A.15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The previous TPMS-ORRC ICR was a reinstatement with change. This ICR is a revision to the Field Survey only. The changes are due to agency discretion. The first change is that where the previous design was a convenience sample in eight geographic areas, the new design is a probability sample in 24 geographic areas. The probability sample is conducted in the 24 counties or groups of counties that form a nationally representative sample designed for NHTSA's Crash Investigation Sampling System. This change was instituted to allow nationally representative estimates in the results. Also, a survey module on indirect TPMS has been added, for the estimated 5 to 10 percent of survey vehicles expected to have this type of system. This change was incorporated to help provide information to NHTSA rulemaking in support of the rulemaking mandate of the FAST Act.

The burden estimate for the revised Field Survey and pilot is 1176 hours. The previous estimate for the Field Survey was 1124 hours, so the change is an increase of 1176-1124 = 52 hours. The previous estimate of burden for the overall TPMS-ORRC included the Field Survey, Suppliers Survey, and Repair Facilities Survey. The Suppliers Survey and Repair Facilities Survey have been completed, so their burden hours and costs are not included in this ICR.

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

NHTSA plans to publish a final report including the findings and the methodology used. Weighted percentages providing nationally representative estimates will be reported for key questions in the survey and for TPMS malfunction rates by vehicle age and type, and TPMS miscalibration rates. Responses to qualitative questions will be reported as tabulated in the data. The final report will be available on NHTSA's web site. Internal briefings and external conference presentations are also likely information dissemination opportunities.

Findings related to any rulemaking involving TPMS and FMVSS 138 will be published in a docket related to the rulemaking or referenced in the rulemaking.

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.

All forms will display the expiration date.

A.18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions are requested.

LIST OF ATTACHMENTS

A. Statutory Authority
    1. National Traffic and Motor Vehicle Safety Act of 1966
    2. Highway Safety Act of 1966

3. TREAD Act
4. FMVSS 138
5. Executive Order 13563
6. FAST Act

B. Federal Register Notices
    1. 60-Day Federal Register Notice
    2. 30-Day Federal Register Notice

C. Data Collection Forms
    1. Vehicle Inspection Form
    2. Drivers Interview Form
    3. Research Questions Mapping