

**SUPPORTING STATEMENT FOR
49 CFR 566, MANUFACTURER IDENTIFICATION**

OMB CONTROL NO. 2127-0043

A. JUSTIFICATION:

This information collection requires manufacturers of motor vehicle and motor vehicle equipment subject to the Federal motor vehicle safety standards to submit to NHTSA, on a one-time basis, their name and address, and a description of the products they manufacture to the standards, so that NHTSA can contact the manufacturer in the event that a safety-related defect or noncompliance with a safety standard should be found to exist in the product.

1. Explain the circumstances that make the collection of information necessary. Attach a copy of the appropriate statute or regulation mandating or authorizing the collection of information.

If a motor vehicle or item of replacement motor vehicle equipment contains a defect related to motor vehicle safety or fails to comply with an applicable Federal motor vehicle safety standard, the manufacturer is required under 49 U.S.C. § 30118 to furnish notification of the defect or noncompliance to the Secretary of Transportation, as well as to owners, purchasers, and dealers of the motor vehicle or replacement equipment, and to remedy the defect or noncompliance without charge to the owner. To ensure that manufacturers are meeting these and other responsibilities under the statutes and regulations administered by NHTSA, the agency issued 49 CFR Part 566, *Manufacturer Identification*. The regulations in Part 566 require manufacturers of motor vehicles or motor vehicle equipment, other than tires, to which a Federal motor vehicle safety standard (FMVSS) applies, to submit to NHTSA, on a one-time basis, identifying information on themselves and on the products that they manufacture to those standards. The information must be submitted no later than 30 days after the manufacturer begins to manufacture motor vehicles or motor vehicle equipment subject to the FMVSS. No specific form need be used for the submission of this information. NHTSA provides an online portal with a fillable web-based format for use in submitting the required information. This is described in a handbook entitled *Requirements for Manufacturers of Motor Vehicles and Motor Vehicle Equipment* that can be accessed on the agency's website at <https://vpic.nhtsa.dot.gov>. A description of the reporting requirement is included on pages 8 and 9 of the handbook. With changes implemented in 2015, manufacturers have been able to make these submissions using an online portal on the above agency website. Manufacturers who have previously submitted identifying information must ensure that the information on file is accurate and complete by submitting revised information no later than 30 days

after a change in the business that affects the validity of that information has occurred.

2. Indicate how, by whom, and for what purpose the information is used. Indicate actual use of information received from the current collection.

Manufacturers are required to submit to NHTSA the following information:

- (1) Full individual, partnership or corporate name.
- (2) The business name of the manufacturer commonly known to the public.
- (3) Residence address of the manufacturer and State of incorporation, if applicable.
- (4) Description of each type of motor vehicle or covered equipment item manufactured by the manufacturer, including, for motor vehicles, the approximate ranges of gross vehicle weight ratings (GVWR) for each type.

The manufacturer must keep entries current, accurate and complete by submitting revised information, not later than 30 days after any change affecting the validity of the information on file has taken place.

The above-identified information is used by NHTSA to locate the manufacturer if a safety-related defect or noncompliance is suspected or found to exist in a motor vehicle or motor vehicle equipment item. The manufacturer forwards the information to NHTSA by entering the information directly into the agency's online portal or by sending the information to the agency by mail, e-mail, or by fax transmission.

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

As previously noted, the required information can be submitted electronically using the online portal on the agency's website at <https://vpic.nhtsa.dot.gov>. Virtually all submissions are now being made in that manner.

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

Manufacturers are required to submit identifying information to NHTSA no later than 30 days after they begin to manufacture motor vehicles or motor vehicle equipment subject to the FMVSS. After that initial submission, manufacturers are not required to submit any additional identifying information unless a change occurs in the information already on file with the agency. It is necessary that this information be furnished by the manufacturer so that NHTSA has accurate identifying information to use in the event that a safety-related defect or noncompliance should be suspected or found to exist in one of the manufacturer's

products. Any uncertainty as to the proper identification of the manufacturer could introduce unnecessary delays into the process of conducting any recall campaign that may be needed to address the defect or noncompliance. Manufacturers are not required to submit identifying information under any other regulation administered by NHTSA. As a consequence, there is no risk for duplication of effort on the manufacturer's part.

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

Most manufacturers of motor vehicles and regulated items of motor vehicle equipment qualify as small businesses. The regulations in Part 566 require each such manufacturer to register with NHTSA. The information each manufacturer needs to provide is, however, very minimal, consisting of no more than the manufacturer's name, address, State of incorporation if applicable, and a description of each type of motor vehicle or item of regulated equipment that it manufactures, including, for vehicles, the gross vehicle weight rating. Owing to the limited nature of this information, there is no need for any special procedure to be in place to minimize the reporting burden on small entities.

6. Describe the consequence to Federal Program or policy activities if the information is not collected or collected less frequently.

If NHTSA were not to collect identifying information on manufacturers of the vehicles and equipment that it regulates, that would impair the agency's ability to notify the responsible manufacturer if the agency should suspect or find that a motor vehicle or equipment item contains a safety-related defect

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

The information collection is fully consistent with the guidelines set forth in 5 CFR 1320.6

8. Provide a copy of the FEDERAL REGISTER document soliciting comments on the conduct of the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

NHTSA solicited public comments on the extension of this information collection by notice published on January 4, 2017 at 82 FR 908. No comments were received in response to the notice and no additional efforts were made to consult with persons outside the agency to obtain their views.

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.

No assurance of confidentiality is given for the information collected under Part 566. All information provided to NHTSA for Part 566 purposes, consisting of the names and address of commercial entities and a description of the products they manufacture to the Federal motor vehicle safety standards, is considered public information. This precludes the need for any assurance of confidentiality to be given.

11. Provide additional justification for any questions on matters that are commonly considered sensitive.

The information which is requested of the manufacturer is not of a sensitive nature.

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

Based on the recent volume of submissions of manufacturer identifying information under 49 CFR Part 566, the agency projects that it will receive submissions from approximately 523 manufacturers in each of the next three years. Assuming that it will take a manufacturer 15 minutes to prepare a letter containing the requested information or to complete the suggested form, the agency estimates that 131 hours will be expended on an annual basis by all manufacturers required to submit Part 566 identifying information. The information is submitted only once unless there is a name change, or the business has relocated and/or has changed the type of vehicles or equipment it manufactures.

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

Assuming that it costs \$30 per hour to prepare the information, the estimated costs associated with the burden hours required to prepare the Part 566 submissions on the part of all affected entities is approximately \$3,930.

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

As the information submitted under 49 CFR Part 566 is an integrated component of several data systems, NHTSA maintains a team of personnel who manage the program associated with the processing of manufacturer identifying information to meet timeliness, accuracy and quality requirements for public, industry and

government needs. The team of federal personnel includes a senior program analyst GS-14 and two full time GS-4 office automation employees along with assigned contract personnel. The GS-4 office automation personnel receive a maximum annual salary of \$38,359 each for processing these requests and contribute 100% and 50% of their time, respectively, in support of the program. The annual costs for these personnel is estimated at \$ 57,539. The senior program analyst assigned to the program is a GS-14 who serves as the oversight authority on the processing and acceptance of submissions; a contact point when routing unique cases to the compliance division; an industry expert for specific advanced questions; and the primary contracting officer representative (COR) for contract resources associated with the team, both for IT and process support. The senior staffer assigned to this program spends an estimated 7.5% of his time supporting and managing the 49 CFR Part 566 process, which based on a GS-14 salary of \$132,514, equates to \$13,251 annually.

In addition, supporting contract resources are used in the program to facilitate system management, workflow, helpdesk and data processing. It is important to note that NHTSA has employed contract resources to facilitate a full Tier 1 helpdesk for the program to ensure that manufacturers, data users and the general public have a proper contact point during normal business hours to support a quality customer service experience through the submission process when the limited federal staff are not available. This ensures the federal staff resource load is focused on the authoritative requirements inherent in the process versus general support needs that can be outsourced. Contract support resources for the 49 CFR Part 566 program are estimated to cost \$110,000 annually to facilitate expedited processing to meet the needs of both industry and the government. Additional system operation and maintenance (O&M) costs are required to support the electronic system required to maintain the program, which includes server, application and data management costs.

Lastly, this program is supported by a shared service information technology (IT) application that is an integrated system and data component for several other processes throughout the agency. The investment that makes up the IT solution is a component based platform of which the support piece that meets the 49 CFR Part 566 process is only a part. As a result, an estimated cost for O&M for this subcomponent for the required level of effort to maintain the IT system would be \$95,000 annually, which is a percentage of the overall IT investment and cannot be separated from the overall system maintenance requirement. This derives from the fact that the IT component for supporting 49 CFR Part 566 is not a standalone platform, but an integrated module in a larger system known as the Crash Data Acquisition Network (CDAN).

As a general rule, costs for contract resources and platform support vary as resource load to support submission review and acceptance is dependent upon volume of receipts, which increases and decreases as industry changes and expands. In addition, there are routine technology changes based on needs and enhancements required for processes to ensure the data use and experiences of all

users are improved and/or optimized to meet the current needs. With all these factors in mind, total annual costs for supporting the 49 CFR Part 566 program are estimated at \$ 275,790 based on current salary, technology and resource costs.

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

The differences in this information collection request from the previous submission is the means the agency is now providing to manufacturer to submit the required information electronically. When it last sought approval for this information collection, the agency projected that it would receive Part 566 submissions from approximately 533 manufacturers each year and that it would take each manufacturer 10 minutes to prepare each submission. Based on the actual number of submission it received over the past three years (523 in 2013, 507 in 2014, and 540 in 2015), the agency reduced the projected number of applications it expects to receive in each of the next three years to 523. The agency has made a corresponding reduction in the projected annual cost to industry for preparing the submissions, from \$3,990 to \$3,930. This is based on a projected expenditure of 15 minutes to make each submission, at a cost of \$30 per hour.

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

The information submitted under Part 566 is posted to the agency's website at <https://vpic.nhtsa.dot.gov> . It is not published in any other form.

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

NHTSA does not seek such approval.

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

No exceptions to the certification statement are made.