

**SUPPORTING STATEMENT FOR THE
INFORMATION COLLECTION REQUIREMENTS OF THE
STANDARD ON POWERED INDUSTRIAL TRUCKS (29 CFR 1910.178)¹
OFFICE OF MANAGEMENT AND BUDGET (OMB)
CONTROL NO. 1218-0242 (December 2018)**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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

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

Under the authority granted by the OSH Act, the Occupational Safety and Health Administration (“OSHA” or “the Agency”) published the Powered Industrial Trucks (the “Standard;” 29 CFR 1910.178). The Standard contains several information collection requirements addressing truck design, construction, and modification, as well as certification of training and evaluation for truck operators.

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

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

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

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

- Paragraph (l)(1)--Ensure that trainees successfully complete the training and evaluation requirements of paragraph (l) prior to operating a truck without direct supervision.
- Paragraph (l)(2)--Allow trainees to operate a truck only under the direct supervision of an individual with the knowledge, training, and experience to train operators and to evaluate their performance, and under conditions that do not endanger other workers. The training program must consist of formal instruction, practical training, and evaluation of the trainee's performance in the workplace.
- Paragraph (l)(3)--Provide the trainees with initial training on each of 22 specified topics, except on topics that the employer demonstrates do not apply to the safe operation of the truck(s) in the employer's workplace.
- Paragraphs (l)(4)(i) and (l)(4)(ii)--Administer refresher training and evaluation on relevant topics to operators found by observation or formal evaluation to have operated a truck unsafely, been involved in an accident or near-miss incident, or been assigned to operate another type of truck, or if the employer identifies a workplace condition that could affect safe truck operation.
- Paragraph (l)(4)(iii)--Evaluate each operator's performance at least once every three years.
- Paragraph (l)(5)--Train rehires only in specific topics that they performed unsuccessfully

during an evaluation and that are appropriate to the employer's truck(s) and workplace conditions.

- Paragraph (l)(6)--Certify that each operator meets the training and evaluation requirements specified by paragraph (l). This certification must include the operator's name, the training date, the evaluation date, and the identity of the individual(s) who performed the training and evaluation.

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

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burdens.

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

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in A.2 above.

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

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

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

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

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

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

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

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

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

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

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

As required by the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3506(c)(2)(A)), OSHA published a notice in the Federal Register on September 28, 2017 (82 FR 45317) soliciting comments on its proposal to extend the Office of Management and Budget's approval of the information collection requirements specified by the Standard on Powered Industrial Trucks (29 CFR 1910.178). The Agency received one comment from an anonymous public citizen (see Docket Number OSHA-2011-0062). The commenter addressed safety issues associated with the electric automobiles, not the information collection requirements contained in the Standard. Therefore, the Agency retains its existing burden hours and cost estimates.

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

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

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

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the Agency considers the

questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

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

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

Respondent Burden Hour and Cost Burden Determinations

In 1998, OSHA published a final rule in which it revised the operator training requirements specified by paragraph (l) of the Standard (see 63 FR 66238). As part of this rulemaking, the Agency performed a Final Economic Analysis (FEA) (see 63 FR 66262). Using data from the FEA for the burden hour and cost estimates described below, OSHA finds that the Standard applies to employers using an estimated 1,210,679 powered industrial trucks operated by about 1,816,018 workers.² There are approximately 4.91 million establishments in NAICS codes where such trucks are used; however, the actual number of establishments using such trucks is

²Source: *County Business Patterns*, U.S. Census Bureau, 2015. This value reflects the overall 9.41% increase in employment across all industries (where powered industrial trucks (PITs) are used i.e., all industries except for NAICS 11 Agriculture, Forestry, Fishing and Hunting) from 2011 to 2015. Additionally, the FEA estimated that each powered industrial truck was used by an average 1.5 operators; to determine the current number of powered industrial trucks in use, OSHA divided the estimated number of workers covered by the Standard by 1.5 (i.e., 1,816,018 ÷ 1.5).

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

Wage Rate Determinations

The Agency determined the wage rate from mean hourly wage earnings to represent the cost of employee time. For the relevant standard occupational classification category, OSHA used the wage rates reported in the Bureau of Labor Statistics, U.S. Department of Labor, Occupational Employment Statistics (OES), May 2016 [date accessed: July 21, 2017]. (OES data is available at: <https://www.bls.gov/oes/tables.htm>. To access a wage rate, select the year, “Occupation Profiles,” and the Standard Occupational Classification (SOC) code.)

To account for fringe benefits, the Agency used the Bureau of Labor Statistics’ (BLS) *Occupational Employment Statistics (OES) (2017)*. Fringe markup is from the following BLS release: *Employer Costs for Employee Compensation* news release text; For release 10:00 AM (EDT), June 9, 2017 (<https://www.bls.gov/news.release/pdf/ecec.pdf>). BLS reported that for civilian workers, fringe benefits accounted for 31.7 percent of total compensation and wages accounted for the remaining 68.3 percent. To calculate the loaded hourly wage for each occupation, the Agency divided the mean hourly wage by 68.3 percent.

WAGE HOUR ESTIMATES⁴				
Occupational Title	Standard Occupational Code	Mean Hour Wage Range	Wage Percent	Loaded Hourly Wage Rate
Supervisory Manufacturing Worker	51-1011	\$29.54	.683	\$43.25
Manufacturing Worker	51-0000	\$17.88	.683	\$26.18
Clerical/Secretary	43-9000	\$16.31	.683	\$23.88

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

³The previous ICR estimated that there were approximately 4.86 million establishments in NAICS codes where such trucks are used. The ratio of total establishments (where PITs are used) in 2011 (7,332,703) to total establishments (where PITs are used) in 2015 (7,641,570) according to *County Business Patterns* was used to estimate the number of establishments where such trucks are used.

⁴Source: *Employer Costs for Employee Compensation, Supplementary Table 2*. Bureau of Labor Statistics, U.S. Department of Labor, May 2016.

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

$$\begin{aligned}\text{Burden hours: } & 1,210,679 \text{ trucks} \times .002 \times 1 \text{ hour} = 2,421 \text{ hours} \\ \text{Cost: } & 2,421 \text{ hours} \times \$26.18 = \$63,382\end{aligned}$$

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

OSHA has no information regarding the number of powered industrial trucks that have front-end attachments installed by employers. Based on the previous public comment received, OSHA believes that few; if any, employers have trucks that require modification to the nameplates and markings provided by the manufacturer with the original truck. OSHA estimates that 0.1 percent of all trucks in use are subject to the provision in (a)(5) of the Standard, and that a manufacturing worker takes 30 minutes (30/60 = .50 hour) to obtain the new information, prepare, and attach the data plate. Accordingly, the annual burden hours and cost of this paperwork requirement are:

$$\begin{aligned}\text{Burden hours: } & 1,210,679 \text{ trucks} \times .001 \times .50 \text{ hour} = 605 \text{ hours} \\ \text{Cost: } & 605 \text{ hours} \times \$26.18 = \$15,839\end{aligned}$$

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

Employers incur a burden to obtain the information to replace data plates or approval markings required by paragraphs (a)(3) through (a)(5) of the Standard, if, for example, the original labels/markings are destroyed or otherwise become illegible. Based on a public comment received on a previous ICR, OSHA estimates that about 20 percent (242,136) of all trucks fall into the category of an "approved" truck and of those trucks, perhaps 1 percent require a new data plate or marking for the reasons described above. OSHA estimates that a manufacturing worker takes 5 minutes (5/60 = .08 hour) to affix the new plates/markings. Accordingly, the annual burden hours and cost of this paperwork requirement are:

$$\begin{aligned}\text{Burden hours: } & 242,136 \text{ trucks} \times .01 \times .08 \text{ hour} = 194 \text{ hours} \\ \text{Cost: } & 194 \text{ hours} \times \$26.18 = \$5,079\end{aligned}$$

⁵See ICR-1218-0242(2001), Ex. 2-1.

(D) Operator Training (§ 1910.178(l)(1) through (l)(3), (l)(4)(i), (l)(4)(ii), and (l)(5))

The Agency concludes that operators who require training consist of new hires, rehires (i.e., received previous operator training from the same or a different employer), and other operators who need refresher training. The following sections describe each type of training.

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

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

Training New Hires Who Have Had Previous Training (Rehires) (§ 1910.178(l)(5))

Upon further consideration, the Agency has determined that requirements that require that employers provide training to workers under paragraphs (l)(1) through (l)(3), (l)(4)(ii), and (l)(5) are not considered to be information collection requirements. OSHA is not taking burden for this activity under Item 12 of this Supporting Statement.

(E) Operator Evaluation (§ 1910.178(l)(4)(iii) and (l)(5))

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

Based on data from the FEA, OSHA determined that supervisors evaluate one-third (605,339) of the operators each year, and that each evaluation takes 30 minutes (30/60 = .50 hour) to perform. Therefore, the yearly burden hour and cost estimates for conducting these evaluations are:

Burden hours: 605,339 operators x .50 hour to perform evaluation = 302,670
hours
Cost: 302,670 hours x \$43.25 = \$13,090,478

Evaluating Rehires (§ 1910.178(l)(5))

The FEA has determined that 15 percent (1,816,018 x .15 = 272,403) of the truck operators are rehires who must receive an evaluation, followed by training on topics they performed unsuccessfully. OSHA estimates that a supervisor requires 10 minutes (.17 hour) each to evaluate the 272,403 rehires.⁶ Accordingly, the annual estimated burden hours and cost for this requirement are:

Burden hours: 272,403 rehires x .17 hour = 46,309 hours
Cost: 46,309 hours x \$43.25 = \$2,002,864

⁶Several factors expedite this evaluation compared to a triennial evaluation; first, the rehires may have recent training certification records available for review and, second, a short interview is often sufficient to determine which topics require additional training.

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

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

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

$$\begin{aligned} \text{Burden hours: } & 272,403 \text{ workers} \times .05 \text{ hour} = 13,620 \text{ hours} \\ \text{Cost: } & 13,620 \times \$23.88 = \$325,246 \end{aligned}$$

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

According to the FEA, about 5 percent ($1,816,018 \times .05 = 90,801$) of truck operators require refresher training because they operated a truck unsafely, had an accident or near-miss incident, or must operate another type of truck, or the employer identified a workplace condition that could affect safe truck operations. OSHA estimates that a secretary takes three minutes (.05 hour) to develop and maintain each refresher training certification record. The annual estimated burden hours and cost for this requirement are:

$$\begin{aligned} \text{Burden hours: } & 90,801 \text{ workers} \times .05 \text{ hour} = 4,540 \text{ hours} \\ \text{Cost: } & 4,540 \times \$23.88 = \$108,415 \end{aligned}$$

(c) Rehires (§ 1910.178(l)(5))

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

$$\begin{aligned} \text{Burden hours: } & 272,403 \text{ workers} \times .05 \text{ hour} = 13,620 \text{ hours} \\ \text{Cost: } & 13,620 \times \$23.88 = \$325,246 \end{aligned}$$

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

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

$$\begin{aligned} \text{Burden hours: } & 605,339 \text{ workers} \times .05 \text{ hour} = 30,267 \text{ hours} \\ \text{Cost: } & 30,267 \text{ hours} \times \$23.88 = \$722,776 \end{aligned}$$

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

Powered Industrial Trucks (29 CFR 1910.178)
1218-0242
January 2018

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

Burden hours: 272,403 rehires x .05 hour = 13,620 hours
Cost: 13,620 hours x \$23.88 = \$325,246

(F) Disclosure of Evaluation and Training Certification Records

The Agency has determined that information collected by the Agency during an investigation is not subject to the PRA under 5 CFR 1320.4(a)(2). Therefore, OSHA takes no burden or cost for disclosure of records.

Estimated Annualized Respondent Hour and Cost Burden Table								
Information Collection Requirement (Across Top of Rows)	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Total Number of Responses	Average Burden per Response (In Hrs.)	Total Burden Hours	Avg. Hourly Wage Rate*	Total Burden Costs
(A) Notification of Truck Modifications (§1910.178(a)(4))	Manufacturing Worker	1,210,679	.002	2,421	1	2,421	\$26.18	\$63,382
(B) Notification of Front-End Attachments (§1910.178(a)(5))	Manufacturing Worker	1,210,679	.001	1,211	.50	605	\$26.18	\$15,839
(C) Inspection of Data Plates or Markers (§1910.178(a)(6))	Manufacturing Worker	242,136	.01	2,421	.08	194	\$26.18	\$5,079
(D) Operator Training (§1910.178(l)(1) through (l)(3), (l)(4)(i), (l)(4)(ii), and (l)(5))								
<i>Initial Training</i> (§1910.178(l)(1) through (l)(3))		0	0	0	0	0	\$0	\$0
<i>Refresher Training</i> (§1910.178(l)(4)(i))		0	0	0	0	0	\$0	\$0

and (l)(4)(ii)								
<i>Training New Hires Who Have Had Previous Training (Rehires)</i> (§1910.178(l)(5))		0	0	0	0	0	\$0	\$0
(E) Operator Evaluations (§1910.178(l)(4)(iii), (l)(5), and (l)(6))								
<i>Triennial Evaluation</i> (§1910.178(l)(4)(iii))	Supervisory Manufacturing Worker	605,339	1	605,339	.50	302,670	\$43.25	\$13,090,478
<i>Evaluating Rehires</i> (§1910.178(l)(5))	Supervisory Manufacturing Worker	272,403	1	272,403	.17	46,309	\$43.25	\$2,002,864
<i>Certification Records of Evaluations and Training</i> (§1910.178(l)(6))								
(a) initial Training (§§1910.178(l)(1)-(l)(3))	Clerical/Secretary	272,403	1	272,403	.05	13,620	\$23.88	\$325,246
(b) Refresher Training (§§1910.178(l)(94)(i) and (l)(4)(ii))	Clerical/Secretary	90,801	1	90,801	.05	4,540	\$23.88	\$108,415
(c) Rehires (§1910.178(l)(5))	Clerical/Secretary	272,403	1	272,403	.05	13,620	\$23.88	\$325,246
(d) Triennial	Clerical/	605,339	1	605,339	.05	30,267	\$23.88	\$722,776

Powered Industrial Trucks (29 CFR 1910.178)
 1218-0242
 January 2018

Evaluation (§1910.178(1)(4)(iii))	Secretary							
(e) Evaluating Rehires (§1910.178(l) (5))	Clerical/ Secretary	272,403	1	272,403	.05	13,620	\$23.88	\$325,246
(F) Disclosure of Evaluating and Training Certification Records		0	0	0	0	0	\$0	\$0
TOTALS		5,054,585		2,397,144		427,866		\$16,984,571

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

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondent (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or Portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

Employers incur costs to obtain the new data plates and “approval” markings from the manufacturer and testing laboratory. Based on previous comments, the cost figures ranged from free to \$150 for the data plate, and \$30 for markings from the testing lab. The Agency does not believe these costs have increased dramatically, and is retaining them in this ICR. OSHA is using an average cost of \$76 for the data plates and \$30 for the approval markings, or \$106 for both⁷. As noted in item 12 (A), OSHA estimates that approximately 2,421 trucks may require a new plate or marking.

Cost: 2,421 trucks x \$106 = \$256,626

⁷ Previous estimates of \$75 for data plates and \$30 for approval markings were updated using the change in Consumer Price Index (CPI) for all items (i.e., 1/38 percent) from 2017 (year for last ICR update) to 2016.

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

There is no cost to the Federal Government.

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

OSHA is proposing to increase the existing burden hour estimate of the collection of information requirements specified by the Standard. In this regard, the Agency is proposing to increase the current burden hour estimate from 888,244 to 911,764 hours, a total increase of 23,520 hours. The adjustment increase is due to updated data indicating a growth in the number of powered industrial trucks from 1,179,441 to 1,210,679 and the number of operators from 1,769,162 to 1,816,018. There is also an increase in the cost burden under Item 13 from \$232,365 to 256,626 (a total increase of \$24,261). This cost increase is also due to an increase in the number of powered industrial trucks. Table 1 below describes each of the proposed burden hour adjustments.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection information, completion of report, publication dates, and other actions.

OSHA will not publish the information collected under the Standard.

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

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

18. Explain each exception to the certification statement.

OSHA is not seeking an exception to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Department of Labor
Occupational Safety and Health Administration
Preclearance Supporting Statement

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

Table 1

Proposed Burden Hour Adjustments

Information Collection Requirement	Current Burden Hours	Proposed Burden Hours	Adjustment (Hours)	Cost Under Item 12	Responses	Explanation of Adjustment
(A) Notification of Truck Modifications (§ 1910.178(a)(4))	2,213	2,421	208	\$63,382	2,421	The adjustment increase is due to updated data indicating a rise in the number of powered industrial trucks from 1,179,441 to 1,210,679 .
(B) Notification of Front-End Attachments (§ 1910.178(a)(5))	553	605	52	\$15,839	1,211	The adjustment increase is due to updated data indicating a rise in the number of powered industrial trucks.
(C) Inspection of Data Plates or Markers (§ 1910.178(a)(6))	177	194	17	\$5,079	2,421	The adjustment increase is due to updated data indicating a rise in the number of powered industrial trucks.
(D) Operator Training (§ 1910.178(l)(1) through (l)(3), (l)(4)(i), (l)(4)(ii), and (l)(5))						
<i>Initial Training</i> (§ 1910.178 (l)(1) through (l)(3))	0	0	0	\$0	0	Upon further analysis, the requirements that employers provide training to workers under paragraphs (1)(1) through (1)(3), (1)(4) and (1)(4)(ii), and (1)(5) are not considered to be collections of
<i>Refresher Training</i> (§ 1910.178 (1)(4)(i) and (l)(4)(ii))	0	0	0	\$0	0	
<i>Training New Hires Who Have Had Previous Training</i>	0	0	0	\$0	0	

Department of Labor
Occupational Safety and Health Administration
Preclearance Supporting Statement

Information Collection Requirement	Current Burden Hours	Proposed Burden Hours	Adjustment (Hours)	Cost Under Item 12	Responses	Explanation of Adjustment
<i>(Rehires)</i> (§ 1910.178(1)(5))						information. OSHA is not taking burden for these activities under Item 12 of this Supporting Statement.
(E) Operator Evaluation (§ 1910.178(l)(4)(iii), (l)(5), and (l)(6))						The adjustment increases are due to updated data indicating a rise in the number of powered industrial truck operators.
<i>Triennial Evaluation</i> (§ 1910.178(1)(4)(iii))	276,638	302,670	26,032	\$13,090,478	605,339	
<i>Evaluating Rehires</i> (§ 1910.178(1)(5))	42,326	46,309	3,983	\$2,002,864	272,403	
Certification Records of Evaluations and Training (§ 1910.178(1)(6))						
(a) Initial Training (§§ 1910.178(l)(1)-(l)(3))	12,449	13,620	1,171	\$325,246	272,403	The adjustment increases are due to updated data indicating a rise in the number of powered industrial truck operators.
(b) Refresher Training (§§ 1910.178(l)(4)(i) & 1910.178(l)(4)(ii))	4,150	4,540	390	\$108,415	90,801	
(c) Rehires (§ 1910.178(l)(5))	12,449	13,620	1,171	\$325,246	272,403	
(d) Triennial Evaluation (§ 1910.178(l)(4)(iii))	27,664	30,267	2,603	\$722,776	605,339	
(e) Evaluating Rehires (§ 1910.178(l)(5))	12,449	13,620	1,171	\$325,246	272,403	
(F) Disclosure of Evaluation and Training	2,634	0	-2,634	\$0	0	The Agency has determined that information collected by

Department of Labor
Occupational Safety and Health Administration
Preclearance Supporting Statement

Information Collection Requirement	Current Burden Hours	Proposed Burden Hours	Adjustment (Hours)	Cost Under Item 12	Responses	Explanation of Adjustment
Certification Records						the Agency during an investigation is not subject to the PRA under 5 CFR 1320.4(a)(2). Therefore, OSHA takes no burden or cost for disclosure of records.
TOTALS	393,702	427,866	34,164	\$16,984,571	2,397,144	