

**Department of Transportation
Office of the Chief Information Officer**

**SUPPORTING STATEMENT
Motor Carrier Records Change Form**

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) approval of a renewal information collection request (ICR) titled, "Motor Carrier Records Change Form." This form collects information the Federal Motor Carrier Safety Administration (FMCSA) requires to process name and address changes and reinstatements of operating authority.

Part A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The FMCSA registers for-hire motor carriers under 49 U.S.C. 13902 (see Attachment A), surface freight forwarders under 49 U.S.C. 13903 (see Attachment B), and property brokers under 49 U.S.C. 13904 (Attachment C). Each registration is effective from the date specified under 49 U.S.C. 13905(c) (See Attachment D).

This information collection supports the DOT's Strategic Goal of Safety by providing motor carriers a means to more efficiently provide the necessary information required to process their name and address changes and reinstatements of operating authority requests.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE IS THE INFORMATION USED

Under 49 CFR part 365.413, for-hire motor carriers, brokers and freight forwarders are required to notify the Office of Registration and Safety Information when they change the name or address of the company. The name change request can be filed online through the Licensing and Insurance (L&I) web site, or companies can fax or mail the form requesting either name or address changes. Carriers can also request reinstatement of a revoked operating authority either online or via fax. This enables FMCSA to maintain up-to-date records so that the agency can recognize the entity in question in case of enforcement actions or other procedures required to ensure that the carrier is fit, willing and able to provide for-hire transportation services, and so that entities whose authority has been revoked can resume operation if they are not otherwise blocked from doing so. This multi-purpose form simplifies the process of gathering the information needed to process the entities' requests in a timely manner, with the least amount of effort for all parties involved.

This ICR has one information collection (IC) described as follow:

IC-1, Form MCSA-5889, Motor Carrier Records Change Form. This form is used by motor carriers to request name and address changes and reinstatements of operating.

3. EXTENT OF AUTOMATED INFORMATION COLLECTION

This multi-purpose form is filed by registrants on a voluntary, as-needed basis. Carriers may file the name change and reinstatement requests online via the L&I web site, but many choose not to do so. About 39% of name change, address change, and reinstatement requests are received by mail; 38% are filed online; and 23% are filed by faxing a request letter to MC-RS. The information collected is then entered in the L&I database by FMCSA staff. This multi-purpose form is on the FMCSA web site so entities can access and print/fax/e-mail the form to MC-RS.

4. EFFORTS TO IDENTIFY DUPLICATION

There are no similar filings made with any other Federal agency or within the Department of Transportation which would result in duplication of this information.

5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES

Paperwork burdens have been minimized for small businesses. This form is completed by filling in blank spaces with limited information to identify the registrant and its operations, and in the case of the name changes and reinstatements, provide credit card information for payment of the required fees. The information collected is the minimum necessary to accomplish the purpose of the filing, and simplifies the process and reduce the labor required of the small business.

6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION

The Form MCSA-5889 is submitted to FMCSA on an “as-needed” basis. Based on the registration requirements described Part A, Question 1, above, it cannot be done less frequently.

7. SPECIAL CIRCUMSTANCES

There are no special circumstances related to this information collection.

8. COMPLIANCE WITH 5 CFR 1320.8:

FMCSA published a notice in the Federal Register with a 60-day public comment period to announce this ICR on October 31, 2017 (see Attachment E). The Agency received three comments on the 60-day notice (82 FR 50481). The comments were not directly related to the information collection. Therefore, no changes to the information collection were made. FMCSA plans to publish a notice in the Federal Register on [MONTH DAY, 2018] with a 30-day public comment period that announces this information will be sent to OMB for approval.

9. PAYMENTS OR GIFTS TO RESPONDENTS

Respondents are not provided with any payments or gifts for this information collection.

10. ASSURANCE OF CONFIDENTIALITY

This collection of information will be kept confidential to the extent allowed by law.

11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

The information requested and collected is not of a sensitive nature.

12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED

FMCSA estimates that approximately 44,900 name changes, address changes, and reinstatements could be filed each year using this form. This estimate is based on the numbers of registrants filing by mail, Website, or fax during the 2016 calendar year (14,000 name changes + 15,400 address changes + 15,500 reinstatements = 44,900 filings). This form will be needed until the motor carriers will be required to make these updates using the Form MCSA-1 in the OMB Control Number 2126-0051, “FMCSA Registration/Update(s),” ICR associated with the Unified Registration System; Final Rule (78 FR 526078), August 28, 2013.

The form asks very limited information which is readily available to the filer. FMCSA assumes it would take a General Operations Managers an estimated 15 minutes to complete the Form MCSA-5889. The mean hourly wage of General and Operations Managers of the Truck Transportation industry (North American Industry Classification System [NAICS] code 484000) is \$41.12.¹

To arrive at a loaded wage, FMCSA first estimated a load factor of 1.421 by dividing the total cost of compensation for private industry workers of the trade, transportation, and utilities industry (\$27.44) by the average cost of hourly wages and salaries (\$19.31) as reported by the Bureau of Labor Statistics in its Employer Costs for Employee Compensation for March 2017.² Multiplying mean hourly wages by the load factor results in a loaded hourly wage of \$58.34 ($\$41.12 \times 1.421 = \58.34).

As shown in Table 1, the total annual labor cost for this ICR is approximately \$654,867. The estimated labor cost per respondent is \$14.59 (15 minutes \times \$58.34 per hour = \$14.59).

Table 1. Respondents and burden hour estimates

Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Total Burden Hours	Hourly Loaded Wage	Total Labor Cost
44,900	1	15 minutes	11,225	\$58.34	\$654,867

Estimated Annual Number of Responses: 44,900 [14,000 name changes + 15,400 address changes + 15,500 reinstatements = 44,900].

Estimated Annual Number of Respondents: 44,900.

Estimated Total Annual Burden: 11,225 hours [44,900 responses \times 15 minutes/60 minutes = 11,225].

13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS

FMCSA estimates respondents will file approximately 17,500 forms annually by mail. This estimate is based on the number of name change, address change, and reinstatement requests

¹ Bureau of Labor Statistics. Occupational Employment Statistics, May 2016 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484000 - Truck Transportation, https://www.bls.gov/oes/current/naics3_484000.htm#11-0000. Accessed September 7, 2017.

² Bureau of Labor Statistics. “Employer Costs for Employee Compensation – March 2017, <https://www.bls.gov/news.release/ecec.nr0.htm>. Accessed September 7, 2017.

received by mail during calendar year 2016. FMCSA estimates a flat cost of \$1.00 for an envelope and postage. The total annual cost of envelopes and postage for respondents mailing the Motor Carrier Records Change Form to the FMCSA is approximately \$17,500 ($\$1.00 \times 17,500$ forms = \$17,500).

Estimated Annual Cost to Respondents: \$17,500

14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

The Motor Carrier Records Change Form will be processed by a Grade 7 Transportation Assistant or a data entry contractor. The labor cost of this activity is estimated to be \$29.71 per hour, comprising wages of \$19.47 per hour,³ employee benefits equal to 36.25 percent of wages, and overhead expenses equal to 12 percent of wages and benefits ($\$19.47 \times 1.3625 \times 1.12$).⁴ FMCSA estimates that processing each Motor Carrier Records Change Form takes approximately 15 minutes, or 0.25 hours. The estimated total annual cost to Federal Government is \$333,495 ($\$29.71 \text{ per hour} \times 44,900 \text{ forms} \times 0.25 \text{ hours per form}$).

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

This program change increase of 5,650 estimated annual burden hours (11,225 proposed hours – 5,575 currently approved hours) is due to an increase in number of respondents. The additional \$17,500 estimated annual cost to respondents accounts for the cost of filing by mail.

16. PUBLICATION OF RESULTS OF DATA COLLECTION

The information collected is not intended for publication for statistical purposes.

17. APPROVAL FOR NOT DISPLAYING THE EXPIRATION DATE OF OMB APPROVAL

FMCSA is not seeking approval to not display the expiration date of OMB's approval of the information.

18. EXCEPTIONS TO CERTIFICATION STATEMENT

No exceptions to the certification statement are requested.

³ Office of Personnel Management. Salary Table 2018-GS, www.opm.gov/policy-data-oversight/pay-leave/salaries-wages. Accessed March 28, 2018.

⁴ Office of Management and Budget. Circular No. A-76 (revised), www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A76/a76_incl_tech_correction.pdf. Accessed March 28, 2018.