

Table 5 - Annual Respondent Burden and Cost

CI Exhaust Emissions Certification & AB&T Programs - All Industries Except Alternative Fuels & HD GHG

Information Collection Activity	Burden and Cost per Application											Total Burden and Cost			
	Engineer	Manager	Legal	Mechanical Engineering Technician	Truck Driver	Assembler	Clerical	Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Frequency or Applications/Respondent ²	Number of Respondents	Total hr/yr	Total Cost/yr
	Rate/hour	Rate/hour	Rate/hour	Rate/hour	Rate/hour	Rate/hour	Rate/hour								
Certification															
Review of regulations and guidance documents	16	9	10	4	0	0	1	40	\$4,570	\$0	\$5	2.0	103	8,240	\$942,394
Developing engine family groups	5	1	0	0	0	0	1	7	\$613	\$0	\$0	1.0	103	721	\$63,174
Developing deterioration factors	30	5	0	38	2	0	3	78	\$5,791	\$0	\$5	2.1	103	17,018	\$1,264,616
In-house Testing³															
Testing/Gathering emission data	10	7	0	60	4	1	14	95	\$6,144	\$0	\$5	2.5	56	13,395	\$867,075
Laboratory maintenance											\$81,237	1.0	56	0	\$4,533,013
Outsourced Testing Costs, Annualized⁴															
HD and NR											\$15,982	3.5	8	0	\$447,487
Marine CI											\$17,970	3.0	10	0	\$539,110
HD Evaporative											\$2,689	0.6	9	0	\$14,520
Analyze data to determine compliance	5	6	1	0	0	0	1	13	\$1,446	\$0	\$0	2.1	93	2,561	\$284,931
Preparing and submitting certification application and fee filing form	5	1	0	0	0	0	4	10	\$668	\$0	\$4	10.4	93	9,206	\$651,192
*Preparing and submitting "carry over" applications	1	0	0	0	0	0	2	3	\$169	\$0	\$5	8.3	93	2,316	\$134,150
Application Fee⁵															
HD Federal											\$55,892	3.1	8	0	\$1,397,300
HD California only											\$563	0.8	8	0	\$3,378
HD Evaporative											\$563	0.8	6	0	\$2,815
NR CI											\$2,940	9.3	40	0	\$1,087,800
Marine CI (All Categories)											\$563	10.7	29	0	\$174,530
Locomotives											\$563	4.1	15		\$34,343
Preparing and supporting running changes	4	1	1	2	0	0	1	9	\$784	\$0	\$6	11.6	103	10,167	\$944,870
Answer questions related to EPA's confirmatory testing	5	3	2	0	0	0	0	10	\$1,176	\$0	\$10	2.0	10	200	\$23,714
Compliance Programs															
Preparing and Submitting Annual Production Report	12	2	1	0	0	0	2	17	\$1,571	\$0	\$3	1.0	103	1,751	\$162,138
Preparing and Submitting AB&T Reports	90	8	6	0	0	0	50	154	\$12,014	\$0	\$50	1.0	33	5,082	\$398,110
SEAs	95	5	2	79	2	2	8	191	\$14,515	\$0	\$16,970	1.0	2	382	\$62,969
Recordkeeping															
Store, file and maintain records	15	10	4	2	2	2	51	84	\$5,584	\$0	\$1,000	1.0	103	8,652	\$678,153
Total per respondent	293	58	27	185	10	5	138	710	\$55,045	\$0	varies	varies	N/A	N/A	N/A
Total for the industry	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$6,320,651	\$0	\$8,391,133	varies	103	79,691	\$14,711,784

¹Includes phone calls, lab maintenance and testing limited to GHG certification. Other lab-related costs have already been accounted for in the general certification collection, ICR 1684. See section 6(b)(ii) for details.

²See section 6(d) for details. Frequency refers to the number of times a respondent performs each task per year. In most instances, this is tied to the number of certification applications in each category, except when in one-time tasks or tasks that apply all applications, such as reviewing regulations.

³Some manufacturers, usually large companies with many engine families, invest in in-house testing laboratories for compliance testing as well as research & development.

⁴ Some manufacturers, usually smaller companies, hire outside laboratories for testing.

⁵Carry over applications are generally a copy of the previous year application except for the first letter of the engine family name. The submittal of certification applications is already accounted for in the certification ICR.

**Table 6 - Annual Resp
HD Engines Certifi**

Information Collection Activity ¹	Burden and Cost per Applic				
	Engineer	Manager	Legal	Mechanical Engineering Technician	Clerical
	Rate/hour	Rate/hour	Rate/hour	Rate/hour	Rate/hour
	\$88.01	\$132.91	\$168.46	\$60.10	\$40.38
Review of regs and guidance document	8.0	3.0	1.0	1.0	0.0
Testing/Gathering emission data on test engines	8.0	1.0	0.0	8.0	1.0
Analyze data to determine compliance	1.0	0.5	0.0	0.0	0.0
Adding GHG data to new, non carry-over certification applications	0.5	0.0	0.0	0.0	0.0
Carry over applications ⁴	0.0	0.0	0.0	0.0	0.0
Prepare & Review GHG Compliance Plan	1.0	1.0	0.0	0.0	0.0
Preparing and supporting running changes/corrections	7.0	5.0	1.0	3.0	8.0
Submitting AB&T and Production Reports	4.0	1.0	0.0	0.0	0.0
Store, file and maintain records	0.0	0.0	0.0	0.0	2.0
Total per manufacturer	30	12	2	12	11
Total for the industry	N/A	N/A	N/A	N/A	N/A

¹This table accounts for the incremental cost of adding GHG data to the HD certification application. Other certification burden ar

²Includes phone calls, lab maintenance and testing limited to GHG certification. Other lab-related costs have already been accou

³See section 6(d) for details. Frequency refers to the number of times a respondent performs each task per year. In most instanc

⁴Carry over applications are generally a copy of the previous year application except for the first letter of the engine family name.

Respondent Burden and Cost

Certification & Compliance

Certification				Total Burden and Cost			
Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O & M Cost ²	Frequency or Applications/ Respondent ³	Number of Respondents	Total hr/yr	Total Cost/yr
13.0	\$1,331	\$0	\$20	1.0	7	91	\$9,460
18.0	\$1,358	\$0	\$1,000	0.3	7	33	\$4,363
1.5	\$154	\$0	\$0	0.3	7	3	\$286
0.5	\$44	\$0	\$2	0.3	7	1	\$85
0.0	\$0	\$0	\$0	5.3	7	0	\$0
2.0	\$221	\$0	\$5	1.0	7	14	\$1,581
24.0	\$1,952	\$0	\$2	1.0	5	120	\$9,772
5.0	\$485	\$0	\$5	1.0	7	35	\$3,430
2.0	\$81	\$0	\$10	1.0	7	14	\$635
66	5,627	0	\$307	varies	N/A	N/A	N/A
N/A	\$27,468	\$0	\$2,144	1.9	7	311	29,612

¹ and costs are accounted for on Table 5, Certification.

² intended for in Table 5, Certification.

³ Yes, this is tied to the number of certification applications in each category, except when in one-time tasks or tasks that apply all applicable. The submittal of certification applications is already accounted for in the certification ICR.

actions, such as reviewing regulations.

**Table 7 - Annual Respondent B
Pickups & Vans Certification**

Information Collection Activity	Burden and Cost per Application					
	Engineer	Manager	Legal	Mechanical Engineering Technician	Clerical	Respondent hr/yr
	Rate/hour	Rate/hour	Rate/hour	Rate/hour	Rate/hour	
	\$88.01	\$132.91	\$168.46	\$60.10	\$40.38	
Review of regulations and guidance	8.0	3.0	1.0	1.0	0.0	13
Test/Gather emission data on test vehicles						
Pickups/Vans						
Dyno Testing	12.0	4.0	0.0	8.0	0.0	24
Coast Down Testing	2.0	2.0	0.0	10.0	0.0	14
Vocational Vehicles						
Tire Testing (ISO28580)	2.0	1.0	0.0	8.0		11
Collect, Input GEM Data & Run Model	20.0	4.0	0.0	0.0	0.0	24
Combination Tractors						
Coefficient of Drag Tests:						
- Coast Down Testing	0.0	0.0	0.0	0.0	0.0	0
- Wind Tunnel Testing	8.0	2.0	0.0	0.0	0.0	10
- Cfd (initial drawing)	8.0	4.0	0.0	0.0	0.0	12
- Cfd (layers)	2.0	1.0	0.0	0.0	0.0	3
Tire Testing ISO 28580	6.0	2.0	0.0	0.0	0.0	8
Collect Data & Run GEM	20.0	4.0	0.0	0.0	0.0	24
Prepare & submit certification applications						
Analyze data to determine compliance	16.0	4.0	2.0	2.0	0.0	24
Prepare and submit new, non-carryover certification applications	1.0	0.3	0.3	0.3	0.5	2
Prepare and submit "carryover" application ⁽³⁾	0.0	0.0	0.0	0.0	0.0	0
Labeling Requirements	0.0	0.0	0.0	0.0	0.0	0
Prepare & Review GHG Compliance Plan (pick up mfrs only)	9.0	8.0	1.0	0.0	1.0	19
Preparing and supporting running changes/corrections	7.0	5.0	1.0	3.0	8.0	24
Store, file and maintain records	3.0	0.5	0.5	0.5	7.0	12
Total per manufacturer	124	45	6	33	17	224
Total for the industry	N/A	N/A	N/A		N/A	N/A

¹Includes expenses such phone calls, printing costs and testing limited to GHG certification, annualized. See section 6(d) for details.

²See section 6(d) for details. Frequency refers to the number of times a respondent performs each task per year, us

³Carry over applications are generally a copy of the previous year application except for the first letter of the engine

Burden and Cost

& Compliance

			Total Burden and Cost			
Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Frequency or Applications/ Respondent ²	Number of Respondents	Total hr/yr	Total Cost/yr
\$ 1,331	\$0.00	\$10	2.6	42	1,420	\$146,478
\$ 2,069	\$0.00	\$100	2.6	7	432	\$39,034
\$ 1,043	\$0.00	\$500	2.6	7	255	\$28,080
\$ 309	\$0.00	\$321	0.1	31	47	\$2,709
\$ 2,292	\$0.00	\$0	0.1	31	103	\$9,855
\$ -	\$0.00	\$1,658	0.4	4	0	\$2,918
\$ 970	\$0.00	\$21,411	0.4	4	18	\$39,390
\$ 1,236	\$0.00	\$5,352	0.4	4	21	\$11,594
\$ 309	\$0.00	\$535	0.4	4	5	\$1,486
\$ 794	\$0.00	\$321	0.4	4	14	\$1,962
\$ 2,292	\$0.00	\$2	0.4	4	42	\$4,037
\$ 2,397	\$0.00	\$0	1.0	6	144	\$14,382
\$ 199	\$0.00	\$2	1.0	6	14	\$1,203
\$ -	\$0.00	\$0	3.2	42	0	\$0
\$ -	\$0.00	\$10	3.3	42	0	\$1,386
\$ 2,064	\$0.00	\$5	1.0	7	133	\$14,484
\$ 1,952	\$0.00	\$2	3.0	20	1,440	\$117,265
\$ 727	\$0.00	\$10	1.0	42	483	\$30,972
\$19,983	\$0	\$14,541	varies	N/A	N/A	N/A
\$400,359	\$0	\$66,877	3.3	42	4,571	\$467,236

on 6(b)(ii) for details.

usually equal to the number of applications or reports per respondent per year.

family name. The submittal of certification applications is already accounted for in the certification ICR.

Table 8 - Annual Respondent Burden and Cost
Marine CI & Locomotive Production Line Testing Program

Information Collection Activity	Burden and Cost per Application										Total Burden and Cost				
	Engineer	Manager	Legal	Mechanical Engineering Technician	Truck Driver	Assembler	Clerical	Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Frequency or Applications/Respondent ²	Number of Respondents	Total hr/yr	Total Cost/yr
	Rate/hour \$88.01	Rate/hour \$132.91	Rate/hour \$168.46	Rate/hour \$60.10	Rate/hour \$40.67	Rate/hour \$39.35	Rate/hour \$40.38								
Review of instructions and regulations	20	4	6	0	0	0	0	30	\$3,303	\$0	\$0	1	25	750	\$82,565
Training	8	0	0	0	1	0	0	9	\$745	\$0	\$30	1	25	225	\$19,369
Projecting testing needs and planning test schedules	11	5	0	1	0	0	0	17	\$1,693	\$0	\$5	3.5	25	1487.5	\$148,554
Engine selection and transport	4	0	0	0	1	1	1	7	\$472	\$0	\$1	3.5	25	612.5	\$41,426
Engine inspection	1	0	0	0	6	0	0	7	\$332	\$0	\$0	3.5	25	612.5	\$29,053
Testing															
Testing (In-house) ³	8	0	0	0	12	2	0	22	\$1,271	\$0	\$100	4	15	1320	\$82,249
Data entry and analysis	8	0	0	1	0	0	0	9	\$764	\$0	\$5	4	15	540	\$46,151
Other tasks (test equipment calibration, engine repair, etc.)	1	0	0	0	93	0	0	94	\$3,870	\$0	\$5	1	15	1410	\$58,130
Testing (Contract out) ⁴	8	1	0	5	0	0	0	14	\$1,137	\$0	\$17,970	2.8	10	392	\$535,019
Preparing and submitting report	8	1	1	2	0	0	0	12	\$1,126	\$0	\$5	3.5	25	1050	\$98,932
Recordkeeping															
Store, file and maintain records	4	2	0	3	0	1	10	20	\$1,241	\$0	\$2	1	25	500	\$31,083
Total per manufacturer	108	7	9	7	113	4	1	249	\$15,954	\$0	varies	varies	N/A	N/A	N/A
Total for the industry	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$661,223	\$0	\$511,307	N/A	25	8899.5	\$1,172,530

¹Includes photocopying, postage expenses, phone calls, testing costs and some lab costs, annualized. Most lab costs for in-house testing are accounted for in Table 5, Certification. See section 6(b)(iii) for details.

²Frequency: 1 = one time tasks; 4 = tasks carried out quarterly; other # = based on actual number of tests. Refer to Section 6(d) for further detail.

³Some manufacturers, usually large companies with many engine families, invest in in-house testing laboratories for compliance testing as well as research & development.

⁴ Some manufacturers, usually smaller companies, hire outside laboratories for testing.

Table 9 - Annual Respondent Burden and Cost

Manufacturer-run In-use Testing Program for HD Engines/Vehicles

Information Collection		Hour and Cost per Response		
Activity	Description	Burden Hours per Vehicle Tested	Cost per vehicle	Cost for 5 vehicles (minimum for in-use each test)
Vendor Cost	Vendor supplies PEMS equipment, all expendables; Installs, operate, removes equipment. Maintains and calibrates equipment, analyzes data, supplies draft EPA submittal files, a test summary, and all backup QA/QC documentation. Travel time and travel costs included.		\$ 48,000	\$240,000
Vehicle manufacturer staff travel	Inspection and testing - varies by location, this is an estimate of an average		\$ 1,150	\$5,750
Customer incentive	Voluntary payment to customers lending their vehicles for testing.		\$ 1,000	\$5,000
Replacement vehicle rental	For customer to use during equipment installation		\$ 250	\$1,250
Vehicle manufacturer hours	60 hours per vehicle for recruiting, inspection, testing, data review and submission, test follow up, etc		58	\$ 10,500
Recordkeeping		2	\$ 362	\$1,810
Total per respondent	N/A	60	\$ 61,262	\$306,310
Total for the industry	N/A	N/A	N/A	N/A

Total Labor Cost: \$ 65,172

Total O&M Costs: \$ 1,772,690

Total Hours and Cost		
Number of Respondents (3)	Total hr/yr	Total Cost/yr
6		\$1,440,000
6		\$34,500
6		\$30,000
6		\$7,500
6	348	\$315,000
6	12	\$10,862.07
N/A	N/A	N/A
6	360	\$1,837,862

Burden and Cost

		Total Burden and Cost			
Capital Startup Cost	O & M Cost ¹	Frequency or Reports per Respondent ²	Number of Respondents	Total hr/yr	Total Cost/yr
\$0	\$0	1.0	35	735	\$85,707
\$0	\$43	1.9	35	3,724	\$366,407
\$0	\$11	1.9	35	1,530	\$142,124
\$0	\$0	1.9	35	446	\$45,874
\$0	\$2	1.0	35	105	\$5,986
\$0	\$0	1.0	6	132	\$14,199
\$0	\$43	4.1	6	713	\$69,355
\$0	\$11	4.1	6	443	\$45,198
\$0	\$11	6.0	6	936	\$96,438
\$0	\$2	4.1	6	1,082	\$50,659
\$0	\$2	1.0	6	18	\$1,026
0	\$123.68	varies	N/A	N/A	N/A
\$0	\$5,372	varies	\$29	9,864	\$922,973

0.275

Table 11- Respondent Burden and Cost

Alternative Fuel Conversions - Beginning-of-Useful-Life Conversions

Information Collection Activity	Burden and Cost per Application			Total Burden and Cost			
	Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Frequency or Applications/Respondent ²	Number of Respondents	Total hr/yr	Total Cost/yr
General Tasks							
Review of regulations and guidance documents	\$3,027	\$0	\$0	1.0	8	188	\$24,217
Developing engine family groups	\$309	\$0	\$0	1.4	8	34	\$3,460
Analyze data to determine compliance	\$1,534	\$0	\$0	1.4	8	157	\$17,185
Preparing and submitting certification application and fee filing form	\$404	\$0	\$4	1.4	8	73	\$4,570
Preparing and submitting "carry over" applications	\$44	\$0	\$4	0.4	8	2	\$154
Preparing and supporting running changes	\$389	\$0	\$6	1.0	4	22	\$1,579
Beginning of Useful Life Conversions - New Applications Only							
Test Cost (annualized) ³	\$0	\$0	\$10,900	2.5	4	0	\$109,000
OBD Compliance Demo	\$176	\$0	\$200	2.5	4	20	\$3,760
Engine Shipping Costs	\$0	\$0	\$833	2.5	4	0	\$8,333
Lodging for employees to oversee testing	\$0	\$0	\$83	2.5	4	0	\$833
Fee	\$0	\$0	\$47,664	2.5	4	0	\$476,640
Intermediate Age Conversions - New applications Only							
Cost of OBD Scan Tool software updates (annualized)	\$128	\$0	\$183	1.0	1	2	\$ 311
Scan OBD and print results	\$176	\$0	\$0	1.0	1	2	\$ 176
Recordkeeping							
Store, file and maintain records	\$1,447	\$0	\$5	1.0	8	152	\$11,613
Total per response (eng family)	\$7,634	\$0	\$59,883	varies	N/A	N/A	N/A
Total for the industry	\$64,720	\$0	\$597,111	varies	8	651	\$661,831

¹Includes phone calls, lab maintenance and testing limited to GHG certification. Other lab-related costs have already been accounted for in the general certification collection, ICR 1684. See section 6(b)(ii) for details.

²See section 6(d) for details. Frequency refers to the number of times a respondent performs each task per year. In most instances, this is tied to the number of certification applications in each category, except when in one-time tasks or tasks that apply all applications, such as reviewing regulations.

³Exhaust Testing only. Evap Certification is accounted for in Table 5 Certification.

Table 11 - Annual Respondent Burden and Cost

Transition Program for Equipment Manufacturers - Equipment Manufacturers

Information Collection Activity	Burden and Cost per Application								Total Burden and Cost		
	Engineer	Manager	Legal	Clerical	Respondent hr/yr	Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Number of Respondents	Total hr/yr	Total Cost/yr
	Rate/hour	Rate/hour	Rate/hour	Rate/hour							
Equipment Manufacturers											
Review of regulations, contact EPA for guidance	12	5	5	1	23	\$2,603	0	\$ 17	107	2,461	\$ 280,377
Select an allowance	3	5	3	0	11	\$1,434	0	\$ -	20	220	\$ 28,679
Notify EPA of participation	1	1	1	1	4	\$430	0	\$ 5	20	80	\$ 8,695
Prepare and send letter to engine manufacturer	5	1	0	1	7	\$613	0	\$ 3	107	749	\$ 65,948
Post Bonds (foreign OEMs only)	1	3	5	10	19	\$1,733	0	\$ 5,000	50	950	\$ 336,642
Apply for Bond Waivers	0.5	0	0	1	1.5	\$84	0	\$ 2	10	15	\$ 864
Keep track of exempt equipment/gather information	10	5	2	25	42	\$2,891	0	\$ 5	107	4,494	\$ 309,879
Develop and submit final calculations (Annual Report)	5	1	0	3	9	\$694	0	\$ 3	107	963	\$ 74,590
Prepare Hardship Relief Requests (annualized)	25	10	25	20	80	\$8,548	0	\$ 15	2	160	\$ 17,127
Meet with EPA staff to answer questions (annualized)	3	1	0	1	5	\$437	0	\$ 1,200	6	30	\$ 9,824
Gather additional Data (annualized)	1.5	0.5	0	1	3	\$239	0	\$ 3	6	18	\$ 1,451
Engine Manufacturers											
Review of regulations, contact EPA for guidance	40	5	5	0	50	\$ 4,724.95	0	\$ 17	25	1250	\$ 118,549
Keep track of engines to be used in exempt equipment/gather information	20	7	0	35	62	\$ 3,880.46	0	\$ 5	25	1550	\$ 97,137
Develop and submit reports	5	3	0	3	11	\$ 899.87	0	\$ 3	25	275	\$ 22,572
Recordkeeping											
Recordkeeping	8	3	2	20	33	\$ 2,247	0	\$ 5	107	1,432	\$ 240,999
Total per respondent	140	51	48	122	361	\$ 31,460	0	\$ 6,283	N/A	N/A	N/A
Total for the industry	N/A	N/A	N/A	N/A	N/A	\$ 1,351,810	0	\$ 261,524	107	14,647	\$ 1,613,334

¹Includes costs such as phone calls and photocopying. See section 6(b)(ii) for details.

Table 13 - Annual Respondent B

Special Compliance Pro

Information Collection Activity	Burden and Cost per Application				
	Engineer	Manager	Legal	Clerical	Respondent hr/yr
	Rate/hour \$88.01	Rate/hour \$132.91	Rate/hour \$168.46	Rate/hour \$40.38	
Review of regulations, contact EPA for guidance	1.5	1	0	0	2.5
Prepare and submit National Security Exemptions (NSEs), annualized	5	3	2	4	14
Amend NSEs	1	0.5	0.5	1	3
Prepare and submit general exemptions (e.g. testing, display, not including imports/exports)	3	0	0	0	3
Keep track of exempt engines	10	0	0	10	20
Develop and submit reports, if applicable	5	3	0	3	11
Prepare and submit exemptions-related FOIA requests	1	0	0	0	1
Recordkeeping					
Recordkeeping	1.5	0	0	3	4.5
Total per respondent	28	7.5	2.5	21	59
Total for the industry	N/A	N/A	N/A	N/A	N/A

¹Includes costs such as phone calls and photocopying. See section 6(b)(ii) for details.

Burden and Cost

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			Total Burden and Cost		
Labor Cost/yr	Capital Startup Cost	O & M Cost ¹	Number of Respondents	Total hr/yr	Total Cost/yr
\$265	0	\$ 17	220	550	\$ 62,024
\$1,337	0	\$ 20	20	280	\$ 27,144
\$279	0	\$ 5	16	48	\$ 4,545
\$264	0	\$ 2	205	615	\$ 54,536
\$1,284	0	\$ 20	205	4100	\$ 267,300
\$960	0	\$ 3	205	2255	\$ 197,399
\$88	0	\$ 10	68	68	\$ 6,665
\$253	0	\$ 13	220	990	\$ 58,554
\$ 4,730	0	\$ 90	N/A	N/A	N/A
\$665,281	0	\$12,885	225	8,906	\$678,166

Table 17 - Annual Agency Burden and Cost

Employee	Level	Hours and Labor Cost				
		Total Annual Labor Cost	Rate Increase by 1.6	Number of Employees	Full time hours per employee	% of Time
CD Full-time Career Employees	GS 12 through 15	\$1,746,822	\$2,794,915	20	2080	80%
SEE Support	N/A	\$55,000	N/A	3	2080	90%
IT/Contract Support	GS 13/5	\$109,900	\$175,840	5	2080	30%
OGC & OECA (lawyers)	GS 13/10	\$126,062	\$201,699	4	2080	20%
Division Director	SES-1	\$201,700	\$322,720	1	2080	25%
Office Director	SES-2	\$181,500	\$290,400	1	2080	15%
Other Staff	GS-11/5	\$71,504	\$114,406	4	2080	10%
NHTSA Full-time Career Employees	GS 12 through 15	\$873,411	\$1,397,458	10	2080	70%
Burden & Labor Total:		\$ 3,365,899	\$ 5,297,438	48	N/A	N/A
O&M Costs						
In-use Testing						
Travel						
Confirmatory & Other Testing						
SEAs						
Contract Support - Compliance						
Contract Support -Certification						
O&M Total:						

13-5 \$ 109,900 \$ 439,600
 13-10 \$ 126,060 \$ 756,360
 14-5 129869 519476

Total hr/yr	Total Labor cost/yr
33,280	\$2,235,932
5,616	\$49,500
3,120	\$52,752
1,664	\$40,340
520	\$80,680
312	\$43,560
832	\$11,441
14,560	\$978,220
59,904	\$ 3,492,425
	\$150,000
	\$12,000
	\$230,000
	\$12,000
	\$30,000
	\$500,000
	\$ 934,000
TOTAL:	\$ 4,426,425

\$2,514,205

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Employee	Level	Rate	Hour
			Rate Increase by 1.6
Engineer	GS-14/1	\$53.08	\$53.08
Engineer	GS-13/1	\$44.91	\$44.91
Contracts/Compliance	GS-13/1	\$44.91	\$44.91
Attorney	GS-13/1	\$44.91	\$44.91
Managers	GS-15/1	\$62.43	\$62.43
SES-1	SES - 1		
IT Support	GS-12/1	\$37.77	\$37.77
IT Support (EPA)			
Subtotal			

O&M Costs	
Other	
Contract Support - Compliance	
Contract Support - Certification	

Hours and Labor Cost

Number of Employees	Full time hours	% of Time	Total hr/yr	Total Labor cost/yr
2	2080	90%	3,744	\$198,732
13	2080	90%	24,336	\$1,092,930
1	2080	25%	520	\$23,353
1	2080	25%	520	\$23,353
2	2080	50%	2,080	\$129,854
2		15%	-	\$0
4		25%	-	\$0

15	N/A	N/A	1,726	\$ 1,468,222
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	\$4,000
	\$100
	\$2,000

TOTAL: \$ 183,395

Table 18 - Certification Response Levels Per Respondent¹

Industry	# of Manufacturers (Cert IC only)	# Engine Families	New Engine Families	Carry-Over Applications	% Carry-Over	ABT
NRCI	40	370	53	317	86%	~33 manufacturers submit AB&T reports
HD Engines Gas & Diesel (Exhaust Emissions)	12	70	28	42	60%	
HD Evaporative	9	15	4	11	73%	
HD GHG Engines	7	37	2	35	95%	
HD GHG Vehicles	42	139	6	133	96%	
Alt Fuel	8	16	10	6	38%	
MCI Categories 1-3	29	310	100	210	68%	
IMO Only	2	2	0	2	100%	
Locomotives	15	61	18	43	70%	
Totals¹:	103	1020	221	799	78%	

¹Many companies certify engines/vehicles in more than one industry. Therefore, the real total of certification respondents is less than the sum of manufacturers in each industry.

Type

PLT
N/A
N/A
N/A
N/A
N/A
N/A
10 manufacturers 71 reports
N/A
14 manufacturers 17 reports

(# of manufacturers) is lower

Table 19 - Number of Reports

Program	Number of Respondents ¹	Initial Response (Application/ Notification/ Report)	Annual Reports + Running Changes + Amendments	Total number of Reports Per Program	Number of Reports per Respondent
Certification (IC #1)					
Certification + Annual Production Reports	103	1,008	1,058	2,066	20.1
Evaporative Cert	9	15	29	44	4.9
AB&T (end-of-year + final reports)	33	25	33	58	1.8
PLT	25	88	0	88	3.5
Defects	35	67	61	128	3.7
In-use	6	6	0	6	1.0
SEAs	2	2	0	2	1.0
Total for Cert:	103	1,211	1,181	2,392	36
Other Programs (ICs #2-4)					
HD Alternative Fuel Conversions	8	17	17	34	4.3
TPEM	132	10	132	142	1.1
Special Compliance Provisions	225	225	120	345	1.5
Total:	468	1,463	1,450	2,913	N/A
Overall number of reports per respondent:					6.2

¹ Of the records in Table 19, the total number of respondents in certification (not including HD Alternative Fuel Conversions) to meet the total shown here comes from 103 respondents in Certification + 8 in HD Alternative Fuel Conversions + 132 in TPEM and 225 in Special Compliance = 468.

Table 20 - Summary by IC and Respondent Tally

Program	Table Number [Section 6(a)]	Number of Respondents	Total Hours Per Year	Total Labor Cost Per Year	Total Annual Capital Costs	Total Annual O&M Costs	Total Costs
Certification IC							
Certification	5	103	79,691	\$ 6,320,651	0	\$ 8,391,133	\$ 14,711,784
HD GHG Engines	6		311	\$ 27,468	0	\$ 2,144	\$ 29,612
HD GHG Vehicles	7		4,571	\$ 400,359	0	\$ 66,877	\$ 467,236
PLT	8		8,900	\$ 661,223	0	\$ 511,307	\$ 1,172,530
In-use	9		360	\$ 65,172	0	\$ 1,772,690	\$ 1,837,862
Defects	10		9,864	\$ 400,359	0	\$ 66,877	\$ 467,236
Total for Cert IC:		103	103,696	7,875,231	0	10,811,028	18,686,259
Alternative Fuels IC							
HD Alternative Fuel Conversions	11	8	651	\$ 64,720	0	\$ 597,111	\$ 661,831
TPEM IC							
TPEM	12	132	14,647	\$ 1,351,810	0	\$ 261,524	\$ 1,613,334
Special Compliance Provisions IC							
Special Compliance Provisions	13	225	8,906	\$ 665,281	0	\$ 12,885	\$ 678,166
Respondent Tally:		468	127,900	9,957,042	0	\$ 11,682,548	\$ 21,639,590
Average Burden Per Respondent			273				

Table 21 - Change in Burden per IC

Information Collection (IC)	Responses			Hours			Non-labor Costs	
	Previously Approved	Change (+/-)	Total Requested	Previously Approved	Change (+/-)	Total Requested	Previously Approved	Change (+/-)
IC #1 – Certification	1,144	1,248	2,392	89,209	14,487	103,696	\$ 16,423,301	\$ (5,612,273)
IC #2 – Alternative Fuel Conversions	4	30	34	293	358	651	\$ 132,820	\$ 464,291
IC #3 – Transition Program for Equipment Manufacturers	2329	-2,187	142	101,066	-86,419	14,647	\$ 792,543	\$ (531,019)
IC #4 – Special Compliance Provisions	403	-58	345	10,469	-1,563	8,906	\$ 23,329	\$ (10,444)
Total:	3,880	-967	2,913	201,037	-73,137	127,900	\$ 17,371,993	\$ (5,689,445)

Total Requested	Reason
\$ 10,811,028	Consolidation of 4 ICRs into ICR 1684.20, as discussed in Section 1(b). The reduction in cost is likely due to the higher use of carry-over applications (from an average of 56% to 78%).
\$ 597,111	Increase in the number of respondents (2 to 8) and responses (4 to 16).
\$ 261,524	Far fewer respondents as program is no longer available for most former respondents
\$ 12,885	Adjustment in estimates. Previous ICR mistakenly included respondents not covered in this ICR.
\$ 11,682,548	