

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

**SUPPORTING STATEMENT
Motor Carrier Identification Report**

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) approval for the renewal of the information collection request (ICR) titled "Motor Carrier Identification Report," OMB Control Number 2126-0013, which is due to expire on April 30, 2019. As part of the renewal, the MCS-150 form is being revised to remove the hazardous material declarations, Class 3A, Class 3B, and Div. 2.2 (Ammonia), because they are obsolete and do not require new or existing applicants to identify those declarations when applying for a USDOT number as a hazardous materials motor carrier.

Part A. Justification.

1. Circumstances that make collection of information necessary.

The Secretary of Transportation (Secretary) is authorized to require carriers, lessors, associations, or classes of them to file annual, periodic, and special reports containing answers to questions asked by the Secretary; and to prescribe the form of records for the Federal Motor Carrier Safety Administration (FMCSA) to administer its safety programs (49 U.S.C. § 504). The Secretary may also prescribe the form of records required to be prepared or compiled and the time period during which records must be preserved (See §504(b)(1) and (d)). FMCSA will use this data to administer its safety programs using a database of entities that are subject to its regulations. This database necessitates that these entities notify FMCSA of their existence. For example, under 49 CFR 390.19(a), FMCSA requires all motor carriers beginning operations to file a Form MCS-150 titled, "Motor Carrier Identification Report," or MCS-150B titled, "Combined Motor Carrier Identification Report and HM Permit Applications." This report is filed by all motor carriers conducting operations in interstate, intrastate transporting hazardous materials or international commerce before beginning operations. It asks the respondent to provide the name of the business entity that owns and controls the motor carrier operation; address and telephone of principal place of business; assigned identification number(s), type of operation, types of cargo usually transported; number of vehicles owned, term leased and trip leased; driver information; and certification statement signed by an individual authorized to sign documents on behalf of the business entity.

This ICR is being renewed as it is currently set to expire on April 30, 2019

This information collection supports the Agency's strategic goal of safety by establishing and monitoring safe operating requirements for motor carriers, commercial motor vehicle drivers, vehicles, and vehicle equipment.

2. How, by whom, and for what purpose is the information used.

The information on the Motor Carrier Identification Report (Form MCS-150) is used by FMCSA to identify its regulated entities, to help prioritize the Agency's enforcement activities, to aid in assessing the safety outcomes of those activities, and for statistical purposes.

FMCSA implemented the "Federal Motor Carrier Safety Regulations: Hazardous Materials Safety Permits" final rule to require all HM-permitted carriers to complete Form MCS-150B, titled "Consolidated Motor Carrier Identification Report and HM Permit Application," to provide the limited additional information required for issuance of a safety permit to transport hazardous materials. The safety program now requires all HM permitted carriers to complete Form MCS-150B in place of the current Form MCS-150. In addition, HM-permitted carriers must complete the MCS-150B in place of the MCS-150 to "renew" both their permit and their USDOT numbers according to the USDOT number renewal schedule in 49 CFR § 390.19 (see Attachment G).

FMCSA implemented the "Requirements for Intermodal Equipment Providers and for Motor Carriers and Drivers Operating Intermodal Equipment" final rule (see Attachment F) to require all IEPs to complete Form MCS-150C, entitled "Intermodal Equipment Provider Identification Report," in order to register with the Agency and receive a USDOT number. FMCSA now regulates intermodal equipment providers and requires them to complete Form MCS-150C, instead of Form MCS-150. In addition, intermodal equipment providers must complete Form MCS-150C to update their USDOT number record according to the USDOT number update schedule in 49 CFR 390.19.

This ICR has been disaggregated into three information collections (ICs) as follow:

- a. IC-1, Form MCS-150, Motor Carrier Identification Report. The Form MCS-150 is filed by all motor carriers conducting operations in interstate or international commerce before beginning operations. It is also used by motor carriers needing to update previously submitted information, and on a biennial update basis.
- b. IC-2, Form MCS-150B, Combined Motor Carrier Identification and HM Permit Application. The Form MCS-150B is filed by interstate motor carriers that transport the permitted hazardous materials. It is also used by motor carriers needing to update previously submitted information, and on a biennial update basis.
- c. IC-3, Form MCS-150C, Intermodal Equipment Provider Identification Report. The Form MCS-150C is filed by IEPs that interchange intermodal equipment with a motor carrier or have contractual responsibility for the maintenance of the intermodal equipment.

3. Extent of automated information collection.

In response to the Government Paperwork Elimination Act, Pub. L. 105-277, 112 Stat. 2681, (October 21, 1988) (See Attachment H), FMCSA allows all respondents to complete Forms MCS-150, MCS-150B, and MCS-150C online at the FMCSA Web site, www.fmcsa.dot.gov (Keyword "MCS-150," or "MCS-150B," or "MCS-150C"). The estimated percentage of forms submitted annually to the Agency online is presented in Table 1.

Table 1. Estimated Annual Percentage of MCS-150 Forms Submitted Online

Form	New	Changes
MCS-150	19%	84%
MCS-150B	41%	89%
MCS-150C	< 1%	49%

4. Efforts to identify duplication.

FMCSA was unable to find any other collections of information that requests this information.

5. Efforts to minimize the burden on small businesses.

The Small Business Administration (SBA) defines small trucking businesses as those with annual revenues or receipts up to \$27.5 million. Based on SBA size standards, FMCSA estimates that 99.1 percent of regulated motor carriers are small businesses.¹ The requirement to submit this information applies to all motor carriers conducting operations in interstate commerce regardless of size.

6. Impact of less frequent collection of information.

FMCSA believes that a longer update cycle will not provide the Agency with the basic data it needs to perform its safety mission efficiently or effectively.

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 (84 FR 2317) on February 6, 2019 (Attachment I), with a 60-day comment period announcing its intention to seek OMB review and approval to revise this ICR. No comments were received on that notice.

9. Payment or gifts to respondents.

Respondents are not provided with any payment or gift for this information collection.

10. Assurance of confidentiality.

¹ See Table 7 – “Estimates of Numbers of Small Entities” in the final rule “Electronic Logging Devices and Hours of Service Supporting Documents” (80 FR 78292; December 16, 2015).

The confidentiality of the information collected from the ICR respondents will be protected to the extent allowed by the Freedom of Information Act (FOIA), 5 U.S.C. § 552 as amended, (Attachment J).

11. Justification for collection of sensitive information.

There are no questions of a sensitive nature.

12. Estimates of burden hours for information requested.

The Agency based its annual burden hour estimates on a three-year average, from 2015 to 2017, of motor carrier application data derived from FMCSA’s Motor Carrier Management Information System (MCMIS).

IC-1: Form MCS-150, Motor Carrier Identification Report

The Form MCS-150 is filed by all motor carriers conducting operations in interstate, as intrastate HM or international commerce before beginning operations. FMCSA estimates that the respondents will require 20 minutes to complete a new filing, 10 minutes to complete a biennial update, and 5 minutes to complete a change (assuming a change is required). MCMIS is, however, unable to differentiate between the changes made to MCS-150 information due to biennial updates and other changes, including the reason for the change. FMCSA in the past has tried to estimate which changes were due to biennial updates and which were other changes, but it is questionable whether this improved the accuracy of the burden estimates. Consequently, FMCSA has decided to use an estimate of 7.5 minutes for any change to MCS-150 data logged in MCMIS. The estimated annual burden for IC-1 is detailed in Table 2.

Table 2. Estimated Annual Burden for IC-1: Form MCS-150, Motor Carrier Identification Report

	New Filings	Biennial Updates and Changes	Total	Total Respondents
Interstate Carriers	58,937	395,440	454,377	594,900
Intrastate Hazmat Carriers	1,734	6,692	8,426	28,237
Intrastate Non-Hazmat Carriers	105,013	94,398	199,411	926,733
Other (Shipper)	1,054	11,406	12,460	46,251
Total	166,738	507,936	674,674	1,596,121
Minutes per Response	20	7.5	-	-
Annual Burden Hours	55,579	63,492	119,071	-

Estimated Average Annual Total IC-1 Annual Burden: 119,071 hours [(166,738 new filings × 20 minutes ÷ 60 minutes) + (507,936 biennial updates and changes × 7.5 minutes ÷ 60 minutes)].

Estimated Average IC-1 Annual Number of Respondents: 1,596,121 respondents [594,900 Interstate Carriers + 28,237 Intrastate Hazmat Carriers + 926,733 Intrastate Non-Hazmat Carriers

+ 46,251 Other (Shipper)].

Estimated Average IC-1 Annual Number of Responses: 674,674 responses [166,738 new filings + 507,936 biennial updates and changes].

IC-2: Form MCS-150B, Combined Motor Carrier Identification Report and HM Permit Application

Interstate motor carriers already must complete the MCS-150 and will only incur an additional 6-minute burden to check off a few additional boxes on the MCS-150B form. It is estimated that the respondents will take 5 minutes on average to complete a change request. The estimated annual burden for IC-2 is detailed in Table 3.

Table 3. Estimated Annual Burden for IC-2: Form MCS-150B, Combined Motor Carrier Identification Report and HM Permit Application

	New Filings	Biennial Updates and Changes	Total	Total Respondents
Interstate Carriers	113	2,173	2,286	2,450
Intrastate Hazmat Carriers	45	380	425	688
Other (Shipper)	18	570	588	673
Total	176	3,123	3,299	3,811
Minutes per Response	6	5	-	-
Annual Burden Hours	18	260	278	-

Estimated Average Total IC-2 Annual Burden: 278 hours [(176 new filings × 6 minutes ÷ 60 minutes) + (3,123 biennial updates and changes × 5 minutes ÷ 60 minutes)].

Estimated Average IC-2 Annual Number of Respondents: 3,811 respondents [2,450 Interstate Carriers + 688 Intrastate Hazmat Carriers + 673 Other (Shipper)].

Estimated Average IC-2 Annual Number of Responses: 3,299 responses [176 new filings + 3,123 biennial updates and changes].

IC-3: Form MCS-150C, Intermodal Equipment Provider Identification Report

Intermodal equipment providers file Form MCS-150C. FMCSA estimates the Form MCS-150C would take 20 minutes the first time that IEPs file this report, and that biennial updates or changes to this information would take 7.5 minutes. The estimated annual burden for IC-3 is presented in Table 4.

Table 4. Estimated Annual Burden for IC-3: Form MCS-150C, Intermodal Equipment Provider Identification Report

	New Filings	Biennial Updates and Changes	Total	Total Respondents
Interstate Carriers	383	55	438	713
Intrastate Hazmat Carriers	19	1	20	33
Intrastate Non-Hazmat Carriers	368	17	385	587
Other (Shipper)	760	75	835	1,246
Total	1,530	148	1,678	2,579
Minutes per Response	20	7.5	-	-
Annual Burden Hours	510	19	529	-

Estimated Average Total IC-3 Annual Burden: 529 hours [(1,530 new filings × 20 minutes ÷ 60 minutes) + (148 biennial updates and changes × 7.5 minutes ÷ 60 minutes)].

Estimated Average IC-3 Annual Number of Respondents: 2,579 respondents [713 Interstate Carriers + 33 Intrastate Hazmat Carriers + 587 Intrastate Non-Hazmat Carriers + 1,246 Other (Shipper)].

Estimated Average IC-3 Annual Number of Responses: 1,678 responses [1,530 new filings + 148 biennial updates and changes].

Total for IC-1, IC-2, and IC-3

Table 5 details the combined total estimated annual burden, number of responses, number of respondents, and burden hour costs of this ICR.

To estimate the total burden hour cost to respondents, FMCSA assumes that a Business Operations Specialist (Standard Occupation Code 13-0000) in the truck transportation industry (North American Industry Classification System [NAICS] code 484000) will undertake these tasks. The median wage for these workers is \$26.84.⁽²⁾ To arrive at a loaded wage, the Agency first estimated a load factor of 1.432 by dividing the total cost of compensation for private industry workers of the trade, transportation, and utilities industry (\$27.68) by the average cost of hourly wages and salaries (\$19.46) as reported by the Bureau of Labor Statistics in its Employer Costs for Employee Compensation for June 2017.⁽³⁾ Multiplying the median hourly wage by the load factor results in a loaded hourly wage of \$38.43. Multiplying the loaded hourly wage by the total number of burden hours for this ICR results in a total estimated burden hour cost of \$4,607,257 (119,887 hours × \$38.43 per hour).

Table 5. Total Estimated Annual Burden for the ICR

	Burden Hours	Responses	Respondents	Burden Hour Cost
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²⁰ Bureau of Labor Statistics. Occupational Employment and Wages, May 2017, NAICS 484000 – Truck Transportation. Available at www.bls.gov/oes/current/naics3_484000.htm. (accessed October 9, 2018).

³⁰ Bureau of Labor Statistics. “Table 10. Employer costs per hour worked for employee compensation and costs as a percentage of total compensation: private industry workers, by industry group, June 2017.” Available at www.bls.gov/news.release/archives/ecec_09082017.pdf. (accessed October 9, 2018).

IC-1	119,071	674,674	1,596,121	\$4,575,899
IC-2	278	3,299	3,811	\$10,684
IC-3	529	1,678	2,579	\$20,329
Total	119,878	679,651	1,602,511	\$4,606,912

Estimated Total Annual Burden for ICR: 119,878 hours [119,071 hours for IC-1 + 278 hours for IC-2 + 529 hours for IC-3].

Estimated Total Number of Annual Responses for ICR: 679,651 responses [674,674 responses for IC-1 + 3,299 responses for IC-2 + 1,678 responses for IC-3].

Estimated Total Number of Annual Respondents for ICR: 1,602,511 respondents [1,596,121 respondents for IC-1 + 3,811 respondents for IC-2 + 2,579 respondents for IC-3].

Estimated Total Burden Hour Cost for ICR: \$4,606,912 [\$4,575,899 for IC-1 + \$10,684 for IC-2 + \$20,329 for IC-3].

13. Estimate of total annual cost to respondents.

Respondents may either complete the MCS-150, MCS-150B, and MCS-150C forms at no cost online or complete a printed copy and mail it to FMCSA. The Agency estimates that a stamp and envelop cost approximately \$1.00. Based on the average number of forms filed by mail between 2015 and 2017, FMCSA approximates respondents will incur an annual cost of \$224,682, as shown in Table 6.

Table 6. Estimated Annual Cost to Respondents to File by Mail

	Total Responses	Percent Filed by Mail	Responses Filed by Mail	Cost to Respondents
IC-1	674,674	33%	222,642	\$222,642
IC-2	3,299	13%	429	\$429
IC-3	1,678	96%	1,611	\$1,611
Total				\$224,682

14. Estimate of cost to the Federal Government.

The information from forms submitted by mail must be manually processed by a data entry contractor. FMCSA estimates that it takes the contractor 2 to 9 minutes per form, or 5.5 minutes on average, to process a form at an hourly rate of \$26.31, which results in a total annual cost of \$541,908, as shown in Table 7.

Table 7. Estimated Annual Cost to Respondents to File by Mail

	Responses Filed by Mail	Cost to the Federal Government
IC-1	222,642	\$536,957
IC-2	442	\$1,066
IC-3	1,611	\$3,885
Total	224,695	\$541,908

Estimate of Average Annual Cost to Federal Government: \$541,908 [\$26.31 per hour × 224,695 forms × 5.5 minutes per form ÷ 60 minutes per hour].

15. Explanation of program changes or adjustments.

The approved ICR for “Unified Registration System, FMCSA Registration/Updates” (OMB Control Number 2126-0051) shows a decrease in annual responses 627,624 (205,412) annual burden hours) from the previous approved “Unified Registration System, FMCSA Registration/Updates” ICR. For this ICR, Motor Carrier Identification Report (OMB Control Number 2126-0013), the program adjustment increased from the previously approved ICR for the Motor Carrier Identification Report. The estimated annual burden hours is 88,607 [119,878 proposed annual hours – 31,271 approved annual hours] due primarily to the Final Rule titled “Unified Registration System,” dated January 17, 2017, which suspended the effective and compliance dates for the online URS and as a result, FMCSA is seeking approval to continue using the Forms MCS-150, MCS-150B, and MCS-150C.

The currently approved ICR assumed that Form MCS-150 would be used only by Mexican domiciled carriers during the second and third year covered by the ICR. In addition, it assumed Form MCS-150B and Form MCS-150C would no longer be used by respondents during the second and third years.

Table 8. Estimated program change

	Approved	Proposed	Change
Burden Hours	31,271	119,878	+ 88,607
Responses	195,055	679,651	+ 484,596

16. Publication of results of data collection.

Registration data for this information collection is publicly available.

17. Approval for not displaying the expiration date for OMB approval.

The FMCSA is not seeking an exemption from displaying the expiration date on the Forms MCS-150, MCS-150B, or MCS-150C.

18. Exception to certification statement.

There are no exceptions to the certification statement.

Attachments

Attachment A – Final Rule titled “Unified Registration System,” dated January 17, 2017

Attachment B - The Department of Transportation and Related Agencies Appropriations Act for fiscal year 2002, Public Law 107-87, 115 Stat. 833, dated December 18, 2001

Attachment C - IFR entitled “New Entrant Safety Assurance Process” (67 FR 31978)

Attachment D - Final rule entitled “Federal Motor Carrier Safety Regulations: Hazardous Materials Safety Permits” (69 FR 39350)

Attachment E - New Entrant Safety Assurance Process” (73 FR 76472)

Attachment F- Final rule entitled “Requirements for Intermodal Equipment Providers and for Motor Carriers and Drivers Operating Intermodal Equipment” (73 FR 76794)

Attachment G - 49 CFR § 390.19

Attachment H - Government Paperwork Elimination Act, Pub. L. 105-277, 112 Stat. 2681, (October 21, 1988)

Attachment I – 60-day Federal Register (84 FR 2317) February 6, 2019

Attachment J - Freedom of Information Act (FOIA), 5 U.S.C. § 552 as amended