# Supporting Statement for New Car Assessment Program (NCAP) Communications Research
# Quantitative ICR Package

## OMB Control Number 2127-new

## Section A

**Draft: May 20, 2019**

**(Revised August 8, 2019)**

**Contents**

A. Justification....4

A1. 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....4

A2. 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....7

A3. 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 the electronic submission of responses, and the basis for the decisions for adopting this means of collection. Also describe any consideration of using information technology to reduce burden....7

A4. 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 Item 2 above....8

A5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden....9

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden....9

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that is not consistent with the guidelines in 5 CFR 1320.6....9

A8. 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 prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments....9

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees....9

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy....10

A11. 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....10

A12. Provide estimates of the hour burden of the collection of information....11

A13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information....12

A14. Provide estimates of annualized costs to the Federal government....13

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I....14
A16. For collections of information whose results will be published, outline plans for tabulation and publication....14
A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate....15
A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I....15

## Summary

The purpose of this research is to obtain critical information that will allow NHTSA and NCAP to fulfill a congressional mandate to improve highway traffic safety. Specifically, the data from this collection will be used to enhance consumer comprehension of safety rating information, enhance the usefulness of safety rating information found on the Monroney label ("window sticker"), and guide the development of communications related to safety ratings and vehicle safety technologies.

While initially focused solely on Monroney label ("window sticker") communications, our qualitative research efforts and research for other NHTSA programs have shown that the consumer purchase process today largely lives online. In fact, according to IHS Automotive 2016 Car Buyer Journey Study, 88% of new-vehicle buyers use the Internet to research their new vehicle purchase.

As a result, the findings from this quantitative research will be used by the Office of Communications and Consumer Information (OCCI) in coordination with the NCAP program office to inform safety rating communications as well as content decisions for relevant web-based communications. As NCAP is responsible for providing consumers with important safety information that will assist them in their vehicle purchase decisions, this research will be used to gather data to substantiate the priorities new-vehicle buyers place on safety ratings and the effectiveness of safety communications approaches. The data collected will also provide meaningful insights into the consumers' vehicle purchase process. The data collected is voluntary. The total burden hours collected for this research is 989 hours.

| | Total Respondents | Minutes Per Person | Total Hours |
|---|---|---|---|
| **Qualitative Cognitive Test of Survey Questions** (Pre-screen Completes) | 600 | x 1.5 | = 15 |
| **Qualitative Cognitive Test of Survey Questions** (Screening Telephone Call & In-person Cognitive Test) | 12 | 55 | = 11 |
| **Online Survey** (Pre-screen Completes) | 18,520 | x 1.5 | = 463 |
| **Online Survey (**NCAP Online Survey Completes) | 1,500 | x 20 | = 500 |

| | |
|---|---|
| **GRAND TOTAL BURDEN HOURS** | = 989 |

## A. Justification

**A1. 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.**

Under its 5-Star Safety Rating Program, the National Highway Traffic Safety Administration (NHTSA) subjects vehicles to frontal crash, side crash, and rollover resistance tests and, based on the results, assigns safety ratings to the tested vehicles. The ratings are expressed in terms of a 5-star rating system, with 5 stars being the highest rating and 1 star, the lowest. The ratings enable consumers to consider and assess the relative safety of vehicles before deciding which new vehicle they want to purchase.

The Automobile Information Disclosure Act (15 U.S.C. 1231-1233), or the "Monroney Act," was enacted into law in 1958 and requires all new light vehicles to have a window sticker affixed that shows:

- Vehicle model;
- Vehicle identification number;
- The final assembly point;
- The name and location of the dealer to whom the vehicle is to be delivered;
- The manufacturer's suggested retail price (MSRP) of the base vehicle;
- The transportation charges for delivery of the vehicle from the manufacturer to the dealer; and
- The total MSRP of all of the above.

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), P.L. 109-59 (August 10, 2005; 119 Stat. 1144) requires new passenger vehicles to also include safety rating information published by NHTSA under its 5-Star Safety Rating Program as part of the Monroney label. Pursuant to the SAFETEA-LU, NHTSA published a final rule (71 FR 53572) on September 12, 2006 requiring manufacturers to include safety rating information by September 1, 2007.

On July 11, 2008, NHTSA published a final decision notice announcing enhancements to the NCAP programs. These enhancements include:

- For the frontal crash program – modifying the frontal NCAP rating system to reflect updated test dummies, expanded injury criteria, and the inclusion of all body regions that are covered by Federal Motor Vehicle Safety Standard (FMVSS) No. 208;
- For the side crash program – modifying the side NCAP rating system to reflect new side impact test dummies, new injury criteria, the inclusion of nearly all of the body regions that are covered by FMVSS No. 214, as well as a new pole test using a small female crash test dummy;
- A new overall vehicle score that will be based on frontal crash, side crash, and rollover resistance test results; and
- A new program that will recommend to consumers advanced crash avoidance technologies that have been shown to reduce crashes and that meet NHTSA's performance criteria.

The enhancements to NCAP took effect in the 2011 model year.

On July 29, 2011, NHTSA published in the Federal Register (76 FR 45453) (Docket No. NHTSA–2010–0025) a final rule to revise the agency's regulation on vehicle labeling of safety rating information to reflect the enhancements to the NCAP program, particularly the addition of the overall vehicle score. The final rule is included in this package as Appendix A.

The final rule included:

- Beginning with model year 2012, safety rating labels on new passenger vehicles that are manufactured on or after January 31, 2012 would be required to include, as the first item of safety information in the safety rating label, an overall vehicle score based on a vehicle's frontal crash, side crash, and rollover resistance ratings. The agency will allow early compliance for model year 2012 vehicles that are manufactured before January 31, 2012 provided that the ratings placed on the safety ratings label are derived from vehicle testing conducted by NHTSA under the enhanced NCAP testing and rating program.

- Language describing the nature and meaning of the NCAP test data used to generate vehicle safety ratings and a referral to http://www.safercar.gov for additional vehicle safety information in the safety rating label would be revised slightly and, in some cases, relocated in the safety rating label.

- The following text, "Safety concern: Visit www.safercar.gov or call 1-888-327-4236 for more details." is only required in the overall vehicle score area of the label. This mitigates space concerns in cases where a vehicle receives a safety concern in more than one crash test area.

- The adopted language states that frontal crash ratings and the overall vehicle score should only be compared to other vehicles of "similar size and weight," rather than of "similar weight class."

- The agency has slightly modified explanatory language that will be required in the side crash area of the safety rating label to make clear that the ratings reflect risks involved in a real-world side impact crash, rather than risks associated with the two crash tests that are used to determine the side crash ratings.

The final rule also discussed NHTSA's plans to conduct comprehensive consumer research on the entire Monroney label to better understand possible tradeoffs consumers make during their purchase decisions and whether the content, amount of space, font sizes, color and/or other variables have an impact on consumer attention and comprehension. This research program was also meant to explore consumer knowledge and interest in advanced crash avoidance technologies in order to guide communications around those that NHTSA endorses.

As a first step in this consumer research, NHTSA conducted qualitative research in 2012 with consumers and new vehicle dealers to achieve the aforementioned objectives related to the Monroney label.

Through this research, NHTSA explored the following: 1) how safety information impacts vehicle purchase decisions, 2) where consumers look for safety information, and, 3) how consumers and dealers use safety and other information located on the Monroney label to aid purchase decisions.

Additional qualitative research, which also comprised consumer focus groups and dealer interviews, was conducted in June 2014 to more specifically explore advanced crash avoidance technologies with the goal of guiding the development of communications on this topic that are useful to consumers.

Results from this study will be used for internal purposes only to help guide the development of effective communications and ongoing customer outreach. This research will help with the following objectives:

1. Validate qualitative findings and prioritize factors/considerations that influence the purchase decision.
2. Measure likelihood to seek out safety information to better understand consumer interest in communications around safety ratings.
3. Evaluate the window sticker in terms of how clear and easy to understand it is overall and prioritize the importance of specific types of information displayed on the sticker.
4. Gauge familiarity and interest with driver assistance technologies.

To achieve these objectives, NHTSA is seeking approval for an online survey with 1,500 consumer respondents. The survey will begin with an exploration of vehicle-purchase decision criteria and then assess consumer engagement with the window sticker. The survey will conclude with a series of questions relating to advanced safety technologies focusing on familiarity, and desire/interest.

Results from this study will be used for internal purposes only in helping to guide the development of communications and ongoing consumer outreach.  As a result, this research in not intended to be generalizable to the driving public.  However, given the strict quota parameters that have been established for drivers across age, gender and region based on U.S. Census data, the study will serve as a reliable approximation of attitudes across the target driving public.

An online survey methodology is essential for this investigation due to the need to test graphical content (e.g. the window sticker and safety information on NHTSA's website), the low incidence of the target population (specifically drivers who have purchased a new vehicle in the past six months or plan to purchase a vehicle within the next 12 months, and the use of a max-diff questionnaire design which would make a mail or telephone approach overly burdensome on respondents and analytically unmanageable. As a result, the survey would utilize an online survey panel for sampling. For the purposes of this study, it is sufficient that the sample be a convenience sample given the strict quotas established based on Census data.

To ensure we are collecting data from a relevant audience, survey respondents will be screened based on the following criteria:

- Respondents must be 18 years or older.
- Respondents must currently possess a valid driver's license.
- Respondents must be in the *new vehicle purchase* mindset. That is, they have either purchased a new vehicle in the past six months, or plan to do so within the next 12 months.
- Respondents must be the primary or a shared decision maker for vehicle purchases in their household. It is anticipated that 18,520 respondents will need to answer the survey screening questions to yield 1,500 completed interviews.

We recommend providing the survey in English only as the graphical treatments that will be evaluated are only available in one language. By providing the survey in additional languages, we risk having content evaluated by consumers who do not understand the language presented. A draft of this survey instrument is provided in this package as Appendix C.

The following sections describe the justification for this proposed consumer research plan in detail.

The National Traffic and Motor Vehicle Safety Act of 1966, Title 15 United States Code 1395, Section 106 (b), gives the Secretary authorization to conduct research, testing, development, and training as authorized to be carried out by subsections for this title. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Section 30168 of Title 49, Chapter 301, gives the Secretary authorization to conduct research, testing, development, and training to carry out this chapter. The full text is included in this package as Appendix D.

**A2. 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.**

The purpose of this research is to obtain critical information that will allow NHTSA and NCAP to fulfill a congressional mandate to improve highway traffic safety. Specifically, the data from this collection will be used to enhance consumer comprehension of safety rating information, enhance the usefulness of safety rating information found on the Monroney label (“window sticker”), and guide the development of communications related to safety ratings and vehicle safety technologies.

While initially focused solely on Monroney label (“window sticker”) communications, our qualitative research efforts and research for other NHTSA programs have shown that the consumer purchase process today largely lives online. In fact, according to IHS Automotive 2016 Car Buyer Journey Study, 88% of new-vehicle buyers use the Internet to research their new vehicle purchase.

As a result, the findings from this quantitative research will be used by the Office of Communications and Consumer Information (OCCI) in coordination with the NCAP program office to inform safety rating communications as well as content decisions for relevant web-based communications. As NCAP is responsible for providing consumers with important safety information that will assist them in their vehicle purchase decisions, this research will be used to gather data to substantiate the priorities new-vehicle buyers place on safety ratings and the effectiveness of safety communications approaches. The data collected will also provide meaningful insights into the consumers’ vehicle purchase process.

**A3. 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 the electronic submission of responses, and the basis for the decisions for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

This data collection will be completed using an online survey in order to facilitate the evaluation of graphical content related to the presentation of the safety ratings in the NCAP section of the Monroney label (“window sticker”) and web-based communications. As this study will be used for internal purposes only and not released to the public, data collection will use a convenience sample: self-selected U.S. licensed drivers who are in the vehicle-purchase mindset and have some responsibility for vehicle purchase decisions in their household. A convenience sample for this study is most appropriate due to the fact the population of interest is small and hard to find, and a random sample design would require a significantly larger sample and incur a significantly larger cost burden.

Because the study is not a probability-based sample, there is no statistical basis to derive unbiased estimates representative of the target population, U.S. passenger vehicle purchasers, or to estimate sampling error. However, NHTSA believes that the benefits offered by an online survey, including the ability to present respondents with mock Monroney labels (“window stickers”) and web-based content, outweigh the disadvantage of potential respondent bias that arises from using a convenience sample.

An electronic data collection design employing modern information technology was chosen to reduce the overall burden on respondents in three ways. First, the survey instrument includes several questions with long batteries of attributes. An online electronic format allows respondents to easily review and respond to these batteries of items, as opposed to a telephone approach which would be particularly cumbersome to convey to the survey participant as well as have them accurately recall the lists for ratings and responses. Second, the survey instrument uses visual aids in multiple areas to prime respondents for accurate assessment of treatments and questions that would be both inaccurate and laborious to try to convey to participants on the telephone. Third, the information technology platform used is mobile-compatible, reducing respondent burden by allowing them more freedom in where and when they are able to respond to the survey instrument.

Given the low incidence population for the study, a mail study approach is not a viable option due to the significant number of mailings that would be required to yield a sufficient number of eligible completed surveys.  Additionally, completion rates for mail studies continue to decline and are now attain the lowest level of completion among any of the standard survey methodology approaches.

Details on the recruitment of respondents for this online survey are available in Section B of this information collection request.

**A4. 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 Item 2 above.**

The primary need to collect new data is the fact that prior data on this subject is a decade old at this point. Significant changes in car buying and information gather have developed over the past decade that necessitate the collection of more recent data. As a result of this, as well as the length of time passed since these studies, we don’t believe information gathered previously can be modified for use for the purposes of this new collection.

NHTSA is mindful of the information that has already been collected from previous research related to vehicle safety and has worked with parties within NHTSA as well as third-party partners to ensure all questioning is relevant, useful, and puts no undue burden on respondents.

**A5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The collection of information will not impact small businesses.

**A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

As an agency responsible for updating the standards upon which vehicle safety is communicated, NHTSA relies on consumer research to develop educational and informative messages that are comprehended by consumers, useful to their purchase decisions, and help make the highways safer by encouraging consumers to purchase safer vehicles. Without timely, accurate information on consumer perceptions of vehicle safety, trusted sources of information, and consumer comprehension and use of safety information, NHTSA will be ill-equipped to identify the most effective methods for communicating this information to vehicle-buying consumers.

**A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that is not consistent with the guidelines in 5 CFR 1320.6.**

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**A8. 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 prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

NHTSA published a notice for public comment for this information collection to the Federal Register on January 3, 2017. The 60-day notice closed March 6, 2017 and there were no comments therein. The docket number in the Federal Register is: Docket No. NHTSA-2016-0119.

**A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Respondents for this study will not be offered cash incentives provided directly by NHTSA. Online research panel members are provided with non-monetary benefits, such as points to be used within the panel, access to forums, and other panel-sponsored discussion opportunities as a thank you for participating in various studies. This incentive management is included as one part of the cost per response figure noted in item A14. We would estimate the monetary equivalent of the points received for this particular study would be about 10-15% of the cost per response, or approximately $2.05 per response.

Prior to survey launch, NHTSA plans to conduct cognitive testing of the survey instrument in the Richmond metro area to ensure questioning is clear and understandable for respondents (See Part B, Section B4 for additional details). A draft of this moderator's guide is provided in this package as Appendix J. Those who participate in these 55-minute cognitive interviews of the survey instrument will be provided a cash honorarium as compensation for their time. This honorarium is provided as an incentive to encourage participants to take the time to travel to a central location, take the survey, and participate in the discussion (therefore minimizing participant out-of-pocket expenses), as well as a sign of appreciation for their thoughts and opinions on the survey language and content.

We will proceed with recruiting 12 participants, with a goal of interviewing at least eight, offering a $75 incentive. All respondents who show up to the facility and participate in the research will receive the same incentive.

## A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

No personally identifiable information (such as Social Security Number, Date of Birth, or home address) is requested within the survey. However, the survey does specify anonymity and aggregate review of data as a set, ensuring that no single respondent will be identified nor associated with specific data responses. The introductory text for this study will include the OMB control number and read as follows:

Thank you for agreeing to participate in this online study. The survey will take about 20 minutes to complete. All responses are anonymous and will only be viewed in aggregate.

Please note that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a current valid OMB control number. The OMB control number for this study is 2127-new. This survey is voluntary. We will not collect any personal information that would allow anyone to identify you. Any information you do provide will be kept private to the fullest extent of the law.

## A11. 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 research will not include any questions of a sensitive or private nature.

**A12. Provide estimates of the hour burden of the collection of information.**

The online survey will take approximately 20 minutes for respondents to complete and will require 1,500 participants. A complete is defined as a respondent who has answered all questions asked of them in the survey through the demographics section at the end. Any data from a respondent that does not complete all questions in the survey will be discarded and the survey counted as an incomplete. NHTSA plans to administer this study one time. In order to identify 1,500 qualified respondents, approximately 18,520 respondents will be needed to complete a 1.5-minute screener. Typical response rates for a short screener of this length with a 20-minute survey is approximately 7-10%. We expect a low eligibility rate due primarily to the recruitment criteria requiring respondents to be in a new vehicle purchase mindset (either having purchased a vehicle within the past six month or planning to within the next 12 months). In addition, projections are based on past performance among panel sourced online surveys of approximately 20 minutes in length.

The subtotal estimated burden imposed by the online survey on participants is approximately 963 hours (This reflects 463 hours plus 500 hours, including: 18,520 respondents x 1.5 minutes = 463 hours plus 1,500 completes x 20 minutes = 500 hours).

For the cognitive test of the survey instrument, NHTSA anticipates needing 55 minutes to allow respondents to navigate the survey while also discussing their feedback on survey questions. Interviews will be conducted with one respondent at a time. For recruiting purposes, a total of eight to 12 potential participants will be recruited via dialed telephone screening calls, which are estimated to take 5 minutes per response for participation. Approximately 600 potential participants will complete a 1.5-minute online pre-screen in order to identify a pool of potentially qualified cognitive testing participants. From that pool, prospective participants will be contacted via dialed telephone screening calls, which are estimated to take 5 minutes per response to confirm eligibility and availability to participate in the cognitive testing. The recruitment calls will utilize the screening section of the survey document to determine qualified respondents.

Based on experience, it is prudent to recruit up to 12 people in order to help achieve at least eight participants showing up for the cognitive tests. Thus, the total burden per participant is estimated to be 60 minutes (5 minutes for the screening/recruiting telephone call, plus 55 minutes for the interview).

The subtotal estimated burden imposed by the cognitive test on participants is approximately 26 hours. (This reflects 15 hours plus 11 hours, including: 600 respondents x 1.5 minutes = 15 hours plus as many as 12 completes x 55 minutes = 11 hours).

Therefore, the total annual estimated burden imposed by this collection of information is approximately 989 interviewing hours, including 26 hours for the cognitive test and 963 hours for the online survey.

***Table 1. Hour Burden Summary***

| | Total Respondents | Minutes Per Person | Total Hours |
|---|---|---|---|
| **Qualitative Cognitive Test of Survey Questions** (Pre-screen Completes) | 600 | x 1.5 | = 15 |
| **Qualitative Cognitive Test of Survey** | 12 | 55 | 11 |

| | | | |
|---|---|---|---|
| **Questions** (Screening Telephone Call & In-person Cognitive Test) | | | |
| **Online Survey** (Pre-screen Completes) | 18,520 | x 1.5 | = 463 |
| **Online Survey (**NCAP Online Survey Completes) | 1,500 | x 20 | = 500 |
| **GRAND TOTAL BURDEN HOURS** | | | 989 |

**TOTAL COST BREAK OUT:**

The maximum total input cost, if all respondents were interviewed on the job, is estimated as follows:

$18.58 per hour[1] x 989 interviewing hours = $18,375.62

**A13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no record keeping or reporting costs to respondents. Respondents who are members of an online panel of U.S. consumers will be contacted and asked to participate in the study. All responses are provided spontaneously. Each respondent only participates once in the data collection. Thus there is no preparation of data required or expected of respondents. Respondents do not incur: (a) capital and startup costs, or (b) operation, maintenance, and purchase costs as a result of participating in the survey.

The only cost burden any respondents will experience are the costs related to travel to and from a central location for participation in the cognitive testing. These costs are minimal and are often offset by the honorarium provided (detailed in A9).

Assuming cognitive testing participants travel a maximum of 60 miles round-trip to and from the facility, the total maximum travel costs would be as follows:

| City | Maximum Participants | Maximum Miles Traveled | IRS Standard Mileage Rate[2] | Total Mileage Costs |
|---|---|---|---|---|
| Cognitive Testing Interviews | 12 | 60 | $0.58/mile | $417.60 |

Participants generally travel less than 30 miles one-way to the central location and ultimately travel costs vary per person. This is meant to be an estimate of the maximum costs that respondents could be expected to incur.

[1] From Bureau of Labor and Statistics' median hourly wage (all occupations) in the May 2018 National Occupational Employment and Wage Estimates, last modified April 2019.

[2] From Internal Revenue Services' 2019 Standard Mileage Rate for business miles driven.

**A14. Provide estimates of annualized costs to the Federal government.**

*Direct Costs*

The following costs are associated with conducting an online survey as described in this justification document:

***Table 2. Direct Costs***

| Item | Unit Rate | Units | Total |
|---|---|---|---|
| Cognitive Test Recruitment | $125 | 12 | $1,500 |
| Cognitive Test Incentives | $75 | 12 | $900 |
| Cognitive Test Facility Costs (Room rental, Computer use, etc.) | $4,000 | 1 | $4,000 |
| | | | |
| Online Survey Cost per Interview | $16.50 | 1,500 | $24,750 |
| Programming & Hosting | $5,000 | 1 | $5,000 |
| Data Processing | $5,000 | 1 | $5,000 |
| **Total** | | | **$41,150** |

*Research Partner Hours*

Research Partners for this engagement will be Team Stratacomm, including Stratacomm and Heart+Mind Strategies. Team Stratacomm will work to develop all ICR package documents, and Heart+Mind Strategies will handle the full execution of all research elements. Staff time for our research partners is calculated using negotiated per hour billing rates. The hours estimated here are based on hours needed for past quantitative projects of a similar scope. These hours include time needed for survey preparation and execution, data analysis, and reporting.

***Table 3. Partner Hours***

| Level | Labor Hour Rate | Estimated Hours | Estimated Total Costs |
|---|---|---|---|
| Executive Vice President | $268.28 | 4 | $1,073.12 |

| | | | |
|---|---|---|---|
| Senior Vice President | $244.49 | 64 | $15,647.36 |
| Vice President | $225.66 | 20 | $4,513.20 |
| Account Director | $205.34 | 115 | $23,614.10 |
| Senior Account Executive | $145.74 | 60 | $8,744.40 |
| Assistant Account Executive | $103.44 | 112 | $11,585.28 |
| **Total Partner Staff Time** | | | **$65,177.46** |

Travel costs incurred as a result of conducting cognitive testing at a central location will be billed to this project at cost and utilize government travel guidelines.

The total estimated cost for this quantitative research program, including in-person cognitive testing, is **$106,327.46**

**A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

The reason for the program change is the introduction of a new information collection request on NCAP communications research.

**A16. For collections of information whose results will be published, outline plans for tabulation and publication.**

Through data processing, we will analyze the total data gathered from the sample of respondents. We will also use cross tabulations to analyze summary statistics and coded open-ended responses across demographic groups to explore any apparent differences; however, the intention of this survey is not to guide decisions on communications targeting by demographics. This analysis will provide NHTSA with the ability to make informed decisions about communications relevant to this initiative.

In addition to cross-tabulations, data processing will include maximum difference scaling for exploration of tradeoffs consumers make with regard to information included on the Monroney label (“window sticker”).

NHTSA expects to receive an interim report from the research contractor within one week of the completion of survey fielding. This will provide top line results of the survey along with findings gathered from an initial look at the data. After a more detailed analysis, a final report will be delivered two weeks after the survey has completed fielding.

The results of this research study are to be used for internal planning purposes. At this time, there are no plans for further publication of the research results.

**A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We do not seek approval to not display the expiration date for OMB approval for this research plan.

**A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

No exceptions to the certification are required for this research plan.