

**SUPPORTING STATEMENT
FOR
CONSOLIDATED CHILD RESTRAINT SYSTEM REGISTRATION, LABELING AND
DEFECT NOTIFICATION**

The provisions of the collection ensure that manufacturers of child restraint systems (CRSs): (1) produce registration cards, informational labels and brochures, (2) collect CRS owner registration information and (3) create and keep registration records. The requirements of this collection apply to CRS manufacturers. This required collection supports the United States Department of Transportation's (DOT) strategic goal in safety, by working towards the elimination of transportation related deaths and injuries involving children.

CRS manufacturers are required to provide owner registration cards and to label their CRSs with a message informing the consumer/CRS owner of the importance of registering the CRS as well as with information necessary to allow subsequent owners to register the restraint. The CRS manufacturer is required to keep records of the registration information received from the consumer by developing and maintaining a filing system that contains the owner's name and address. The owner information is important to increase the likelihood that owners will learn of safety recalls of their CRSs, and remedy the safety problems with their CRSs.

CRS manufacturers are also required to disclose in all CRSs: (1) a printed instructions brochure with step-by-step information on how the restraint is to be used and (2) permanent labeling that gives "quick-look" information on whether the restraint meets the safety requirements, recommended installation and use, the child weight limit for using the lower anchors to attach the child restraint to the vehicle and warnings against misuse. The provided instructions and labeling are to guide the consumer on how to properly activate and use CRSs. Without proper use, the effectiveness of CRSs is greatly diminished.

The increase in burden is primarily due to updated CRS sales estimates. The agency previously estimated that approximately 10,600,000 CRSs were sold each year. In 2018, the agency estimates that 14,500,000 CRSs will be sold each year.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The National Highway Traffic Safety Administration (NHTSA) statute at 49 U.S.C. Subchapter II Standards and Compliance, sections 30111 and 30117, authorizes the issuance of Federal motor vehicle safety standards (FMVSS). The Secretary is authorized to issue, amend, and revoke such rules and regulations as she/he deems necessary. The Secretary is also authorized to require manufacturers to provide information to first purchasers of motor vehicles or motor vehicle equipment when the

vehicle or equipment is purchased, in a printed matter placed in the vehicle or attached to or accompanying the equipment.

Using this authority, the agency issued the initial FMVSS No. 213 in 1971. Child restraint systems (CRSs) are devices used for protecting infants and young children in motor vehicle or aircraft crashes. The standard requires CRSs to be labeled with safety information and requires the devices to be accompanied by printed instructions. Instructions for built-in systems are to be printed in the vehicle's owner's manual, OMB Clearance Number 2127-0541, on the deployment and use of the CRSs.

This information collection "Consolidated Child Restraint System Registration, Labeling and Defect Notifications" (OMB Control Number: 2127-0576) ensures that CRS manufacturers: (1) produce registration cards, labels and brochures, (2) collect CRS owner registration information, and (3) create and keep registration records so that in the event of a safety recall, manufacturers can provide direct notification to owners. CRS manufacturers are also required to label each CRS and provide brochures with safety information and instructions on the proper use of the restraint. Such information would mitigate the risk of misuse and consequently reduce injuries and fatalities of children in crashes. This collection supports the United States Department of Transportation's (DOT) strategic goal in safety, by working towards the elimination of transportation related deaths and injuries involving children.

The standard requires manufacturers of CRSs to register the owners of CRSs so that they may be directly contacted in a recall campaign. The standard requires:

- (a) A two-part perforated registration card. The first part contains a message and suitable instructions to be retained by the purchaser. The second part is to be returned to the manufacturer by the purchaser. The second part includes prepaid return postage, the pre-printed name/address of the manufacturer, the pre-printed model and date of manufacture, and spaces for the purchaser to fill in his/her name and address;
- (b) A permanently attached label on the CRS which includes a statement providing mailing and telephone instructions (or, at the option of the manufacturer, a toll-free hotline telephone number) for non-original owner registration and for re-registration, and the U.S. Department of Transportation's Auto Safety toll-free hotline number for reporting and receiving safety-related information about the CRS; and
- (c) A filing system containing CRS owners' names and addresses maintained by the CRS manufacturer suitable for easy access in the event of a recall campaign. The registration records are to be maintained by the manufacturer for 6 years.

FMVSS No. 213 permits information regarding online product registration to be included on the owner registration form required under the standard. This enhances the opportunity of restraint owners to register their CRSs online, which may increase

registration rates and the effectiveness of recall campaigns. Manufacturers are also permitted to supplement (but not replace) recall notification via first-class mail with e-mail notification, which increases the likelihood that owners learn of a recall. Manufacturers are required to include a U.S. telephone number on a CRS label for the purpose of enabling consumers to register their products by telephone.

Increasing CRS registrations is an important part to protecting young children and infants. By registering CRSs, product manufacturers will be able to directly contact owners in the event of any safety recalls. Chapter 301 of Title 49 of the U.S. Code of Federal Regulations (CFR) provides that if either the NHTSA or a manufacturer determines that a motor vehicle or item of motor vehicle equipment contains a defect that relates to motor vehicle safety or fails to comply with an applicable FMVSS, the manufacturer must notify owners and purchasers of the defect or noncompliance and must provide a remedy without charge. Pursuant to 49 CFR Part 577, "Defect and noncompliance notification," for equipment items, including CRSs, must be sent "by first class mail to the most recent purchaser known to the manufacturer."

FMVSS No. 213 requires each CRS be permanently labeled with the following information:

1. Manufacturer's name, model, manufacture date, and a statement that the CRSs conforms to all applicable FMVSSs.
 2. A warning label with the following:
 - a. A statement that infants be restrained in rear-facing CRSs
 - b. A statement with weight and height ranges of children who can safely occupy the CRS.
 - c. For CRSs that are equipped with belts to restrain children, a statement to snugly adjust belts to restrain the child.
 - d. For CRSs equipped with a tether strap, the statement to secure the tether strap.
 - e. For booster seats, a statement on using the vehicle's lap or lap/shoulder belt restraint, as appropriate, for securing the child.
 - f. A maximum allowable child weight for which the lower anchorages may be used to install the CRS to the vehicle seat.
 - g. A statement to follow all instructions on the CRS and the written instructions provided in the user's manual.
 - h. A statement to register the CRS with the manufacturer.
 3. A warning label on rear facing CRSs to warn parents against using the restraint in any vehicle position equipped with an air bag.
 4. An installation diagram showing the CRSs installed using a vehicle's 1) lap/shoulder belt, 2) lap belt, and 3) child restraint anchorage system.
 5. FMVSS No. 213 requires printed installation instruction that provide a step-by-step procedure including diagrams, for installing the CRS in motor vehicles, securing the system in the vehicle, positioning the child in the system, and adjusting the system to fit the child. The installation instructions should include installation using the vehicle's seat belts and child restraint anchorage systems.
2. Indicate how, by whom, and for what purpose the information will be used.

The requirements of this collection apply to CRS manufacturers. The provisions of the collection ensure that CRS manufacturers: (1) produce registration cards, labels and brochures, (2) collect CRS owner registration information and (3) create and keep registration records.

Each manufacturer of CRSs must label each system and provide brochures with safety information and instructions on using the restraint. If such information is not provided, the consumer will not know how to properly activate and use the CRSs – such as not to use it in front of an air bag or that lower anchors of a child restraint anchorage system may be used to install a CRS until the weight of the child is equal to or less than the specified weight– which could result in increased injuries and fatalities of young children and infants in automobiles and aircraft crashes. Without proper use, the effectiveness of these systems is greatly diminished. The manufacturer is also required to provide a printed instructions brochure with step-by-step information on how the restraint is to be activated and used. Therefore, there is a need to have instructions with each add-on and built-in CRS to explain how the CRS should be used. A permanently attached label gives quick-look information on whether the restraint meets the safety requirements, recommended installation and use and warnings against misuse.

In collecting owner registrations, a CRS manufacturer receives registration information direct from the card attached to each CRS device, from the internet (for those manufacturers that allow electronic registration) or from a substitute form sent to the owner by NHTSA. The standard requires the manufacturers to provide owner registration cards and to label their CRSs with a message informing users of the importance of registering the restraint, as well as with information necessary to allow subsequent owners to register the restraint. It also requires manufacturers to develop and maintain a filing system that contains the owner's name and address that shall be in a form suitable for inspection such as computer information storage devices or card files. The owner information is important to increase the likelihood that owners will learn of safety recalls of their CRSs, and remedy the safety problems with their CRSs.

3. Describe whether the collection of information involves the use of technological collection techniques or other forms of information technology.

Optionally, CRS manufacturers are permitted to add to the registration form: (a) Specified statements informing CRS owners that they may register online; (b) the Internet address for registering with the company; (c) revisions to statements reflecting use of the Internet to register; and (d) a space for the consumer's email address. For those CRS owners with access to the Internet, online registration may be a preferred method of registering a CRS.

For those owners who obtain a substitute CRS registration form, an electronic means is available for downloading the form from NHTSA's Internet Web site or consumers can request the form by calling the DOT's Auto Safety Hotline.

There is no technological collection techniques used in the production of CRS labels. A paper label affixed to the restraint system is generally sufficient under the standard.

Computer-based filing systems are currently being used by most CRS manufacturers in keeping CRS registration records. Maintaining owner's registration information via an electronic database system seems to be the lowest cost viable method to have information available to be used in contacting CRS owners in case of a need to impart safety information to CRS owners or to contact them in case of a recall. Manufacturers are required to maintain a file system of this information of their choice, but the standard does not require the use of electronic records.

The additional requirements for this collection involve minimal use of technological techniques. The necessary information can be gathered by the manufacturer using a scale for measuring weight.

4. Describe efforts to identify duplication. Show specifically why similar information cannot be used.

NHTSA is the only Federal agency regulating CRSs. Only this agency requires manufacturers of CRSs to label them or to collect registration information covering names and addresses of CRS owners. Note that CRSs that also function as hand-held infant carriers are required by the Consumer Product Safety Commission to have markings, labeling, and instructions on the proper use of the infant carrier and warnings intended to alert the caregiver of strangulation, fall, and suffocation hazards. No other similar information is available. Each CRS model is different and requires its own deployment and use instructions. Each user of a CRS needs such information. No other similar information is available. Each CRS model is different and requires its own deployment and use instructions. Each user of a CRS needs such information.

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

This regulation applies to all manufacturers of CRSs. In total, there are currently 29 manufacturers producing CRSs and none of which are considered small business entities.¹ Information that must be provided in labeling in order to comply with the standard is minimal and takes an estimated 2 seconds to determine. NHTSA has also minimized the burden on these manufacturers by allowing them to place information on the registration card for purchasers to complete their product registrations via the internet. By registering over the internet, an electronic record is created without the manufacturer having to manually compile a record for each CRS. Similarly, if a defect or compliance problem exists with a CRS, the manufacturer is able to better search its records to locate and contact consumers owning the same model of the defective seating system. No other effective easy means has been found to minimize the burden in any other area.

¹ According to the Small Business Administration (SBA) database listed at http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm.

6. Describe the consequences to Federal program and policy activities if the information is not collected or collected less frequently.

If the information is not collected, there is no assurance that CRS owners will be given proper use information. The information currently provided on or with the CRS includes instructions on how to correctly use the CRS, and recommendations on which children are suitable for the CRS. Without this information, the effectiveness of the CRS could be greatly diminished.

The CRS registration information enables manufacturers to directly contact CRS owners to notify them of safety recalls. This better ensures that owners will hear about a recall and will remedy the safety problem with their systems. Manufacturers must retain the owner registration records for 6 years because NHTSA's records indicate that if a CRS is recalled, it is generally recalled within a 6-year period from the production date of the CRS.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

There are no special circumstances requiring the labeling to be reported in a manner inconsistent with those specified in 5 CFR 1320.6.

8. Attach the Federal Register document soliciting comments on extending the collection of information, and a summary of all public comments responding to the notice. Describe efforts to consult with persons outside the agency to obtain their views.

The document was published on May 16, 2018 (83 FR 22744). NHTSA did not receive any comments.

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

No payment or gift will be provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

This item does not apply. No assurances of confidentiality are given by the agency, since labeling is a part of the manufacturing process. The required installation and use information is about the use of CRSs by consumers and confidentiality is neither desired nor necessary.

11. Provide additional justification for any questions that are commonly considered private.

Registration names and addresses are voluntarily provided by consumers to the CRS manufacturer and are used to contact owners in the event of a recall or safety notification.

The required labeling is on the use of CRSs and does not include information that might be considered sensitive or private.

The substitute registration form provided by NHTSA has a statement authorizing the agency to provide the CRS registration information to the manufacturer. If written authorization is not provided, the personal identification information is not provided to the manufacturer. This substitute registration form requests personally identifiable information and includes a form that requires a Privacy Act Statement.

12. Provide estimates of the hour burden of the collection of information on the respondents.

The total estimated hour burden increased from the 40,497 hours to 99,330 burden hours (58,833 burden hours increase). The increase in burden is due to the inclusion of the burden hours to consumers for filling the registration form and due to an increase in CRS sales. The agency previously estimated that approximately 10,600,000 CRSs (including booster seats) are sold each year and 4,500,00 of them are CRSs equipped with an internal harness. In 2018, the agency estimates that 14,500,000 CRSs (including booster seats) are sold each year and 10,150,000 of them are CRSs equipped with an internal harness. The total cost increased from \$809,940 to \$2,351,374 (\$1,541,434 cost increase). The number of respondents has also been updated from 15 to 29.

Estimated Annual Burden: 99,330 hours

Number of Respondents: 29

The estimate of the total burden of the collection of information for FMVSS No. 213 is 99,330 hours. The total additional burden hours for this collection consist of (1) the hours spent by consumers filling out the registration form, (2) the hours spent collecting registration information and (3) the hours spent determining the maximum allowable child weight for lower anchor use and adding the information to the existing label and instruction manual.

This consists of reporting hours shown below:

(1) Annual Burden for filling out registration card

Number of CRS Manufacturers (Respondents).....	29
Number of CRS Produced Each Year.....	14,500,000
Number of Returned CRS Registrations Each Year.....	2,569,400
Time to fill out registration card.....	1 min (60 sec)

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Approximately 14,500,000 CRSs are sold each year with an estimated registration rate of 17.72% (2,569,400). Consumers must spend 60 seconds filling out each registration form. The estimated annual number of burden hours for consumers to fill out the registration form is 42,823 hours (2,569,400 Registration Cards x (60 seconds / 3,600 seconds/hour)).

Using the average hourly wage for all employees in private non-farm industries of \$26.75² to fill in the registration form, the total cost is estimated by multiplying 42,823 hours by \$26.75 an hour which equals \$1,145,515.

(2) Annual Burden for Reporting (collecting registration information)

Number of CRS Manufacturers (Respondents).....	29
Number of CRS Produced Each Year.....	14,500,000
Number of Returned CRS Registrations Each Year*.....	2,569,400
Time to collect each returned registration	1.5 min (90 sec)

* By registration card. Internet registrations are considered to have no burden.

Approximately 14,500,000 CRSs are sold each year with an estimated registration rate of 17.72% (2,569,400). Of the total registrations received, 83.58% (2,147,504) are from registration cards and 16.42% (421,895) are from online registrations. Manufacturers must spend 90 seconds to enter the information from each returned registration card; while, online registrations are considered to have no burden for the manufacturer, as the information is entered by the purchaser. Given these estimates, the estimated total annual number of burden hours for this collection of information is 53,688 hours (14,500,000 CRSs X 17.72% X 83.58% X (90 seconds per registration card / 3,600 seconds/hour)).

Using an average hourly wage for production and non-supervisory employees in the manufacturing industry³ of \$21.34⁴ to prepare, collect and keep record of each CRS registration, the total cost is estimated by multiplying 53,688 hours by \$21.34 an hour which equals \$1,145,702.

(3) Annual Burden for Reporting (determining maximum allowable child weight)

Number of CRS Manufacturers (Respondents).....	29
Number of CRS Produced Each Year.....	14,500,000
Number of CRS equipped with harness.....	10,150,000
Label Required (%).....	50
Number of CRS Requiring Label.....	5,075,000
Time to Determine Information on the Label for Each CRS Design	2 seconds

Approximately 14,500,000 CRSs (including booster seats) are sold each year, where 10,150,000 of them are CRSs equipped with an internal harness. About half (50%) of the CRSs equipped with an internal harness would require the label with the maximum

² According to the Bureau of Labor Statistics as of February 2018 (preliminary). <https://www.bls.gov/news.release/empsit.t19.htm>

³ According to the Bureau of Labor Statistics as of February 2018 (preliminary). <https://www.bls.gov/news.release/empsit.t24.htm>

⁴ Previous supporting statements for this collection assumed an average cost of \$20.00 per hour for professional/clerical personnel. This cost has been updated with the national average hourly wage of production and non-supervisory employees in the manufacturing industry as of February 2018.

allowable child weight for using the lower anchors information (5,075,000). Manufacturers must spend 2 seconds to determine the maximum allowable child weight for lower anchor use and to add the information to the existing label and instruction manual. Given these estimates, the estimated total additional annual burden hours for this proposed addition label information is 2,819 hours (10,150,000 CRSs X 50% X (2 seconds / 3,600 seconds/hour)).

Using an average hourly wage for production and non-supervisory employees in the manufacturing industry of \$21.34 to calculate the weight value that should be displayed on the label, the total additional cost is estimated by multiplying 2,819 hours by \$21.34 an hour which equals \$60,157.

The estimated total annual burden hours for this collection of information are 99,330 hours (42,823 hours + 53,688 hours + 2,819 hours) and the total cost is \$2,351,374 (\$1,145,515 + \$1,145,702 + \$60,157).

13. Provide estimates of the total annual cost to the respondents or record keepers.

There is no additional estimated cost to the respondents or record keepers associated with the required label information.

14. Provide estimates of the annualized cost to the Federal government.

The estimated cost to the Federal government associated with processing the form, and emailing the form to the appropriate manufacturer is approximately \$1,108.00 per year ((Processing 1,500 forms, 2 minutes per form at a cost of \$22.40⁵ per hour = \$1,108.00).⁶

There is no additional estimated cost to the Federal government associated with the required label information.

15. Explain reasons for any program changes or adjustments.

This is a reinstatement without a change of a previously approved collection. The increase in burden is due to the inclusion of the burden hours to consumers for filling the registration form and due to an increase in CRS sales. The agency previously estimated that approximately 10,600,000 CRSs were sold each year by 15 manufacturers. In 2018, the agency estimates that 14,500,000 CRSs will be sold each year by 29 manufacturers. The total estimated hour burden and cost is dependent on the number of CRSs sold and the estimated registration rate of registration cards. Due to the increase in CRS sales, the total estimated hour burden increased from 40,497 hours to 99,330 burden hours (a

⁵ Previous supporting statements for this collection assumed an average cost of \$20.00 per hour for professional/clerical personnel. This cost has been updated with the average wage estimate by the Bureau of Labor Statistics as of February 2018 (preliminary) for production and non-supervisory employees in private non-farm industries. <https://www.bls.gov/news.release/empsit.t24.htm>

⁶ Previous supporting statements estimated postage costs. NHTSA now e-mails the information to the corresponding manufacturers at no additional cost.

58,833 burden hour increase) and the total cost increased from \$809,940 to \$2,351,374 (a \$1,541,434 cost increase).

16. For collections of information whose results are planned to be published, outline plans for tabulation, and publication.

The collected data on the labels, card, postage, attachment, and record keeping requirements will not be published for statistical use.

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

Approval is not sought to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement.

No exception is made to any of the items in the certification statement.