

**Department of Transportation
Federal Motor Carrier Safety Administration**

SUPPORTING STATEMENT

Unified Registration System, FMCSA Registration/Updates

INTRODUCTION

The Federal Motor Carrier Safety Administration (FMCSA) submits to the Office of Management and Budget (OMB) its request to renew a currently-approved information collection request (ICR) titled “*Unified Registration System, FMCSA Registration/Updates*” (OMB Control No. 2126-0051). The currently approved ICR, which is due to expire on January 31, 2020, applies to new registrants that are subject to FMCSA’s licensing, registration, and certification regulations.

New registrants seeking operating authority must use online Form MCSA-1, accessible via the Unified Registration System (URS). Existing registrants⁽¹⁾ seeking additional authorities must use forms from the OP-1 series, including OP-1, OP-1(P), OP-1(FF), and OP-1(NNA). New and existing Mexico-domiciled carriers must apply for authority using Form OP-1(MX). Information collection activities associated with the OP-1 series of forms are covered under a different ICR, titled “Licensing Applications for Motor Carrier Operating Authority,” OMB Control No. 2126-0016.

FMCSA is requesting that information collection approval for online Form MCSA-1 continue to be effective for the 3-year period covered by this ICR.

Part A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

FMCSA registers:

- For-hire motor carriers of regulated commodities and of passengers, under 49 U.S.C. § 13902(a) (Attachment A);
- Surface freight forwarders, under 49 U.S.C. § 13903 (Attachment B);
- Property brokers, under 49 U.S.C. § 13904 (Attachment C); and
- Certain Mexico-domiciled motor carriers, under 49 U.S.C. § 13902(c) (Attachment A).

¹ Existing registrants are entities that already have a USDOT number and/or operating authority.

These motor carriers may conduct transportation services in the United States only if they are registered with FMCSA. Each registration is effective from the date specified and remains in effect for such period as the Secretary of Transportation (Secretary) determines by regulations.

The Final Rule titled “Unified Registration System,” (78 FR 52608) dated August 23, 2013, implemented statutory provisions for an online registration system for entities that are subject to FMCSA’s licensing, registration, and certification regulations (Attachment D). URS streamlines the registration process and serves as a clearinghouse and repository of information on motor carriers, brokers, freight forwarders, intermodal equipment providers (IEPs), hazardous materials safety permit (HMSP) applicants, and cargo tank facilities required to register with FMCSA. When developing URS, FMCSA planned that the OP-1 series of forms (except for OP-1(MX)) would ultimately be folded into one overarching form (MCSA-1), which would be used by all motor carriers seeking authority.

FMCSA began a phased rollout of URS in 2015. The first phase, which became effective on December 12, 2015, impacts only first-time applicants seeking an FMCSA-issued registration. FMCSA had planned subsequent rollout phases for existing registrants; however, there have been substantial delays, and subsequent phases have not been rolled out to date.

On January 17, 2017, FMCSA issued a Final Rule titled “Unified Registration System; Suspension of Effectiveness,” which indefinitely suspended URS effectiveness dates for existing registrants only (82 FR 5292) (Attachment E). Pursuant to this Final Rule, FMCSA is still accepting forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) for existing registrants wishing to apply for additional authorities. Separately, FMCSA requires Form OP-1(MX) for Mexico-domiciled carriers that wish to operate beyond the U.S. municipalities on the U.S.-Mexico border and their commercial zones.

As described above, only first-time applicants seeking an FMCSA-issued registration must apply via URS. Under URS, all forms described in the current ICR, except OP-1(MX), are folded into Form MCSA-1. Information collection activities associated with the OP-1 series of forms are covered under a different ICR, titled “Licensing Applications for Motor Carrier Operating Authority,” OMB Control No. 2126-0016.

The current information collection supports the DOT Strategic Goal of Safety. It streamlines registration processes and ensures that FMCSA can more efficiently track motor carriers, freight forwarders, brokers, and other entities regulated by the Agency.

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

Form MCSA-1 is an interactive, online form that allows users to see and complete only sections that are applicable to their specific operation(s). There is no paper version of Form MCSA-1; users must complete the form online.

As described in Item 1 above, new registrants seeking initial operating authority with FMCSA must fill out Form MCSA-1. Every interstate and intrastate hazardous material motor carrier operating commercial motor vehicles (CMVs) is required to register with

FMCSA to obtain a USDOT Number. Most for-hire carriers are also required to file a separate application for operating authority under 49 U.S.C. 13901 (Attachment F).

Form MCSA-1 requests information to identify the applicant, the nature and scope of its proposed operations, safety-related details, and information regarding the drivers and vehicles it plans to use in U.S. operations.

FMCSA and the States use registration information collected via Form MCSA-1 to track motor carriers, freight forwarders, brokers, and other entities they regulate. Registering motor carriers is essential to being able to identify carriers so that their safety performance can be tracked and evaluated. The data make it possible to link individual trucks to the responsible motor carrier, thus implementing the mandate under 49 U.S.C. 31136(a)(1); that is, ensuring that CMVs are maintained and operated safely (see Attachment G). In general, registration information collected via Form MCSA-1 informs prioritization of the Agency's activities and aids in assessing and statistically analyzing the safety outcomes of those activities.

3. EXTENT OF AUTOMATED INFORMATION COLLECTION

Form MCSA-1 is exclusively available online; thus, 100 percent of the information collection activities associated with Form MCSA-1 are automated.

4. EFFORTS TO IDENTIFY DUPLICATION

Federal rules promulgated by the Pipeline and Hazardous Materials Safety Administration (PHMSA) may duplicate the URS provisions to some extent, as they relate to hazardous materials (HM) motor carriers required to register under PHMSA's Hazardous Material Registration System. However, other than the basic identification information—i.e., company name, address, and DOT number(s)—the information filed for PHMSA and FMCSA does not overlap. PHMSA's Hazardous Material Registration System cannot be combined with URS. Further, PHMSA's Hazardous Material Registration System contains data for many entities that are not regulated by FMCSA (e.g., airlines, ship lines, and railroads), while URS contains data for entities that are not regulated by PHMSA (e.g., non-HM carriers, brokers, etc.). Further, the HM-related information collected is different, as the PHMSA system aggregates data at a higher level than FMCSA. The two information collections also serve different purposes. PHMSA's information collection is meant to determine whether the carriers are small entities (and therefore subject to lower fees). FMCSA's information collection serves multiple purposes, discussed in Item 2 (above), that require more detailed data. There are no other similar filings made with any other Federal agency that would result in duplication of this information.

5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES

Form MCSA-1 reduces the burden on first-time small businesses applicants that are subject to both FMCSA commercial and safety jurisdiction by eliminating the filing of multiple forms (i.e., the OP-1 series of forms) that request some of the same information. Online

filing also limits the cost of submission and speeds the process of obtaining USDOT numbers needed to begin operating.

6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION

The information on Form MCSA-1 is collected only at initial registration (i.e., it is a one-time collection of information). However, motor carriers are required to update their registration information biennially. This is done using Form MCS-150. Information collection activities associated with Form MCS-150 are covered under a different ICR, titled “Motor Carrier Identification Report,” OMB Control No. 2126-0013. FMCSA believes that a longer update cycle simply will not provide the Agency with the basic data it needs to perform its safety mission efficiently or effectively.

7. SPECIAL CIRCUMSTANCES

No special circumstances apply to this information collection.

8. COMPLIANCE WITH 5 CFR 1320.8:

On September 11, 2019, FMCSA published a Federal Register notice (84 FR 48000) and received one comment (Mr. Gary Porter). Mr. Porter states that he was charged with an accident in Shasta County California on 08/14/2017 for a crash he had nothing to do with and would like to have it removed from his record. This information is not applicable to this ICR, and FMCSA attempted to contact the commenter on November 25, 2019 to help resolve this issue but the contact number was disconnected. As a result, there were no relevant comments filed on the 60-day notice.

9. PAYMENTS OR GIFTS TO RESPONDENTS

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

10. ASSURANCE OF CONFIDENTIALITY

There is no assurance of confidentiality. All registration applications filed with FMCSA become part of a public docket and are open to the public for inspection and review.

The personally identifiable information (PII) collected on Form MCSA-1 includes information from persons required to register with FMCSA as a sole proprietor/driver or owner of a motor carrier, intermodal equipment provider, freight forwarder, broker, or cargo tank facility. Although a business name qualifies as PII under OMB Circular M-07-16, it is not PII in the sense that Privacy Act protections apply to its public disclosure. The PII collected will include the name, address, email address, taxpayer employer identification number (EIN) or social security number (SSN), credit card number, and checking account number of these persons. Confidentiality of the PII will be protected by reasonable security safeguards against loss or unauthorized access, destruction, usage, modification, or disclosure. These safeguards incorporate standards and practices required for Federal

information systems under the Federal Information Security Management Act (FISMA) of 2002 (44 U.S.C. 3542) and are detailed in Federal Information Processing Standards (FIPS) Publication 200 entitled, “Minimum Security Requirements for Federal Information and Information Systems,” dated March 2006 and NIST Special Publication (SP) 800-53 Rev. 3 entitled, “Recommended Security Controls for Federal Information Systems and Organizations,” dated August 2009 as amended.

FMCSA has a comprehensive information security and privacy program that contains management, operational, and technical safeguards appropriate for the protection of PII. These safeguards are designed to achieve the following objectives:

- Ensure the security and confidentiality of PII.
- Protect against any reasonably anticipated threats or hazards to the security or integrity of PII.
- Protect against unauthorized access to or use of PII.

The collected PII will be protected to the extent allowed by the Freedom of Information Act (FOIA), 5 U.S.C. 552, as amended (see Attachment H) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896, enacted Dec. 31, 1974, 5 U.S.C. § 552a). The assurance of confidentiality is addressed in detail in the Privacy Impact Assessment (see Attachment I) prepared for the initial URS rulemaking action.

11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

The purpose(s) for collecting PII from a sole proprietor/driver or owner of a motor carrier, intermodal equipment provider, freight forwarder, broker, or cargo tank facility is to track safety-related data in order to recognize trends and use this information for making policy and program changes. The collection of PII is necessary to implement URS because it allows both Federal and State law enforcement agencies to positively identify specific records in FMCSA information systems. The justification for collection of sensitive information is addressed in detail in the Privacy Impact Assessment (see Attachment I), prepared for the initial URS rulemaking action.

12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED

ASSUMPTIONS FOR BURDEN ESTIMATES

The MCSA-1 form will be filed when a carrier or other entity regulated by FMCSA first applies for a USDOT number. Table 1 presents the number of new entrants who applied for operating authority using Form MCSA-1 during calendar years 2016, 2017, and 2018. It should be noted that the reported number of new entrants filing for operating authority via MCSA-1 in calendar year 2016 is based on a partial year of data, from February 19 through December 31, 2016, which amounts to 316 days. By dividing the number of responses reported for 2016 by 316 days, we find that an average of 118 respondents filed Form MCSA-1 per day in calendar year 2016. To produce an estimate of how many responses would have been submitted during the 49 days between January 1 and February 18, 2016, we multiply the average of 118 respondents per day by 49 days, which yields 5,782. Thus, to

produce a full-year estimate of MCSA-1 responses for calendar year 2016, we add 37,428 and 5,782, to arrive at an estimated 43,210 responses in 2016.

Table 1. Number of new entrant applicants, by year, for calendar years 2016–18.

Calendar Year	New Entrants Submitting Form MCSA-1
2016*	37,428 (reported for Feb. 19-Dec. 31, 2016) + 5,782 (estimated for Jan. 1-Feb. 18, 2016) 43,210 (total estimated responses for 2016)
2017	49,009
2018	63,406
Total	155,625
<i>Annual Average</i>	<i>51,875</i>

* Data reported for 2016 are partial year data, from February 19 through December 31, 2016. See the narrative for additional details on the methodology used to estimate a full year of responses for 2016. Data reported for 2017 and 2018 are full-year data, from January 1 to December 31 of each calendar year.

Source: FMCSA, Office of Registration and Safety Information, Vetting Tracker (n.d.); accessed May 2019.

The total estimated number of respondents is 155,625 [43,210 respondents in 2016 + 49,009 respondents in 2017 + 63,406 respondents in 2018 = 155,625].

The annual estimated number of respondents is 51,875 [43,210 respondents in 2016 + 49,009 respondents in 2017 + 63,406 respondents in 2018 = 155,625 / 3 years = 51,875].

Table 2 presents the estimated annual responses for Form MCSA-1 (one response per respondent). The time required to read the instructions, collect the information, and complete the form, which incorporates information from the MCS-150 and the OP-1 series of forms is estimated to average 1.34 hours, based on an FMCSA analysis of user completion times.

Table 2. Estimated respondents and burden hours for initial filings, by year, for calendar years 2020-22.

Calendar Year	Respondents/ Responses	Hours per Response	Total Burden Hours
2020	51,875	1.34	69,512.5
2021	51,875	1.34	69,512.5
2022	51,875	1.34	69,512.5
Total	155,625	–	208,537.5
<i>Annual Average</i>	<i>51,875</i>	–	<i>69,512.5</i>

The total estimated number of burden hours is 208,537.5 (155,625 responses * 1.34 hours per response = 208,375.5 hours).

The annual estimated number of burden hours is 69,512.5 (208,537.5 hours / 3 years = 69,512.5 hours).

ESTIMATED LABOR COSTS FOR INDUSTRY

FMCSA expects completion and submission of Form MCSA-1 to be performed by a carrier compliance officer or equivalent. The Agency estimates the labor cost for this occupation to be \$42.33, comprising wages of \$26.96 per hour⁽²⁾ multiplied by a load factor of 1.57.^(3,4) Estimated labor costs to the industry associated with filing Form MCSA-1 are presented in 3.

Table 3. Estimated labor hour costs by year, for calendar years 2020-22.

Year	Responses	Hours per Response	Hourly Wage	Total Labor Cost to Respondents
2020	51,875	1.34	\$42.33	\$2,942,464.13
2021	51,875	1.34	\$42.33	\$2,942,464.13
2022	51,875	1.34	\$42.33	\$2,942,464.13
Total	155,625	–	–	\$8,827,392.39
<i>Annual Average</i>	<i>51,875</i>	–	–	<i>\$2,942,464.13</i>

- The total estimated labor cost to respondents is \$8,827,392.39 [\$2,942,464.13 in 2020 + \$2,942,464.13 in 2021 + \$2,942,464.13 in 2022 = \$8,827,392.39].
- The annual estimated labor cost to respondents is \$2,942,464.13 [\$8,827,392.39 / 3 years = \$2,942,464.13].

13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS

Motor carriers applying for initial authority via Form MCSA-1 in URS are required to pay a one-time form filing fee of \$300. Estimated industry filing fee costs associated with Form MCSA-1 are presented in .

² Bureau of Labor Statistics. “May 2018 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 484000 - Truck Transportation.” Available at www.bls.gov/oes/current/naics3_484000.htm#13-0000. Accessed April 16, 2019.

³ The load factor for carrier compliance offers is calculated by multiplying the total cost of compensation for private industry workers of the transportation and warehousing series (\$40.49) by the average cost of hourly wages and salaries (\$25.80), as reported by the Bureau of Labor Statistics (\$40.49/\$25.80 = 1.57).

⁴ U.S. Department of Labor, Bureau of Labor Statistics. (2018). “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 2018,” in News Release: Employer Costs for Employee Compensation—June 2018. Retrieved July 19, 2019, from: https://www.bls.gov/news.release/archives/ecec_09182018.pdf.

Table 4. Estimated MCSA-1 filing fee costs to respondents by year, for calendar years 2020-22.

Year	Responses	Form Filing Fee	Total Fee Cost to Respondents
2020	51,875	\$300.00	\$15,562,500.00
2021	51,875	\$300.00	\$15,562,500.00
2022	51,875	\$300.00	\$15,562,500.00
Total	155,625	–	\$46,687,500.00
<i>Annual Average</i>	<i>51,875</i>	–	<i>\$15,562,500.00</i>

- The total estimated fee cost to respondents is \$46,687,500.00 [155,625 respondents x \$300 filing fee = \$46,687,500.00].
- The annual estimated fee cost to respondents is \$15,562,500.00 [\$46,687,500.00 / 3 years = \$15,562,500.00].

All responses will be filed electronically. Therefore, there are no mailing or postage costs associated with this ICR. All filers are assumed to have computers or to be able to access the online filing site from public computers. Some carriers may pay a third party to file the information as part of a service to assist them in setting up a business. The fees charged, however, cover multiple services. FMCSA has no information on how many carriers use such services or what part of the fees should be attributed to filing this form.

14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

FMCSA estimates that the total Federal Government cost associated with processing MCSA-1 applications for the three-year period covered by this ICR is \$5,717,460.24. This estimate includes staff costs (\$3,234,807.42 total) and IT support (\$2,482,652.82 total).

Built into URS is a screening system that flags applicants who may be high-risk carriers. This tool—known as the Utility for Risk-Based Screening and Assessment, or URSA—includes an algorithm and corresponding software for an automatic risk-based assessment that calculates a risk potential based on the likelihood that an applicant for operating authority is a chameleon carrier, is attempting to reincarnate, or is attempting otherwise to receive authority illicitly. URSA is an effective tool that speeds up the registration process

and reduces the number of Federal labor hours spent on registration screening activities. Instead of manually reviewing every application received, FMCSA staff conduct more in-depth reviews of applicants flagged by URSA as potentially high-risk.

Since 2016, URSA has flagged between 4.9 percent (in 2018) and 14 percent (in 2016) of applicants as potentially high risk. The algorithm in URSA has been modified since it was introduced in 2016, to reduce the number of “false flags” produced by the tool. Since the introduction of URSA, more than 740 motor carriers seeking authority have been rejected because they were deemed to be unsafe.

When URSA flags a motor carrier, FMCSA’s vetting staff manually screens the applicant. There are two steps in this process: pre-screening and full investigation. If an applicant passes the pre-screening phase, no additional steps are necessary. However, if an applicant fails the pre-screening phase, a full investigation must be conducted. Pre-screening activities are conducted by one of FMCSA’s vetting agents (either GS-9 or GS-11), while full investigations are conducted by FMCSA’s senior vetting agents (either GS-12 or GS-13).

As described above, FMCSA staff only review a percentage of MCSA-1 applications. Table 5 presents the number of applications manually reviewed by FMCSA staff for calendar years 2016 through 2018.

Table 5. MCSA-1 applications screened and/or investigated by FMCSA vetting staff, 2016-2018.

Calendar Year	Applications Pre-Screened	Applications Fully Investigated	Total Screening and Investigation Activities
2016	5,220	547	5,767
2017	2,871	507	3,378
2018	3,099	591	3,690
Total	11,190	1,645	12,835

The total estimated number of applications prescreened is 11,190 [5,220 in 2016 + 2,871 in 2017 + 3,099 in 2018 = 11,190].

The annual estimated number of applications prescreened is 3,730 [5,220 in 2016 + 2,871 in 2017 + 3,099 in 2018 = 11,190 / 3 years = 3,730].

The total estimated number of applications fully investigated is 1,645 [547 in 2016 + 507 in 2017 + 591 in 2018 = 1,645].

The annual estimated number of applications fully investigated is 548 [547 in 2016 + 507 in 2017 + 591 in 2018 = 1,645 / 3 years = 548].

It is estimated that it takes a vetting agent approximately 8 hours to pre-screen one application. FMCSA has two vetting agents (one at the GS-9 level and one at the GS-11 level) that conduct pre-screening activities, and applications are split between these staff. Thus, it is estimated that it takes approximately 4 hours per person (on a team of two) to pre-screen a single application (4 hours x 2 people = 8 hours).

Senior vetting agents typically conduct multiple investigations simultaneously, and like the pre-screening activities, the applications are split among senior vetting staff. FMCSA has six senior vetting agents that conduct full investigations of flagged applicants (three at the GS-12 level and three at the GS-13 level). At any given time, a senior vetting agent may be working on three to four cases (an average of 3.5 cases at a time). It takes approximately two weeks for a senior vetting agent to begin and finish 3.5 cases. Based on these figures, FMCSA

estimates that it takes approximately 22.86 hours for a senior vetting agent to conduct one complete investigation (80 hours / 3.5 cases = 22.86 hours). It is thus estimated that it takes approximately 3.81 hours per person (on a team of six) to conduct a single investigation (3.81 hours x 6 people = 22.86 hours).

Estimated loaded hourly wages for Federal staff are as follows:

- GS-9 Vetting Agent I: \$40.69, comprising wages of \$31.79 per hour (average of 2019 Step 1-10 GS-9 DC hourly wage) and benefits equal to 28 percent of wages.
- GS-11 Vetting Agent II: \$49.61, comprising wages of \$38.76 per hour (average of 2019 Step 1-10 GS-11 DC hourly wage) and benefits equal to 28 percent of wages.
- GS-12 Senior Vetting Agent I: \$59.02, comprising wages of \$46.11 per hour (average of 2019 Step 1-10 GS-12 DC hourly wage) and benefits equal to 28 percent of wages.
- GS-13 Senior Vetting Agent II: \$70.18, comprising wages of \$54.83 per hour (average of 2019 Step 1-10 GS-13 DC hourly wage) and benefits equal to 28 percent of wages.^(5,6)

⁵ Office of Personnel Management. Salary Table 2019-Dcb for the Locality Pay Area of Washington, Baltimore, Arlington, DC-MD-VA-WV-PA. Available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/DCB.pdf>. Accessed August 9, 2019.

⁶ Consistent with other FMCSA ICRs.

Table 6, which is based on the estimates above, presents the estimated labor hours and costs to the Federal Government associated with processing Form MCSA-1.

Table 6. Estimated MCSA-1 labor hours and costs to the Federal Government by year, for calendar years 2020-22.

Year	Federal Vetting Process	Federal Vetting Position	# of Staff	Hours per Response	Number of Applications Processed	Total Labor Hours	Load ed Hourly Wage	Total Annual Cost
2020	Pre-screen	GS-9	1	4.00	1,865	7,460	\$40.69	\$303,547.40
		GS-11	1	4.00	1,865	7,460	\$49.61	\$370,090.60
	Full Investigation	GS-12	3	3.81	274	3,132	\$59.02	\$184,840.02
		GS-13	3	3.81	274	3,132	\$70.18	\$219,791.13
	2020 Total			8	–	4,278	21,184	–
2021	Pre-screen	GS-9	1	4.00	1,865	7,460	\$40.69	\$303,547.40
		GS-11	1	4.00	1,865	7,460	\$49.61	\$370,090.60
	Full Investigation	GS-12	3	3.81	274	3,132	\$59.02	\$184,840.02
		GS-13	3	3.81	274	3,132	\$70.18	\$219,791.13
	2021 Total			8	–	4,278	21,184	–
2022	Pre-screen	GS-9	1	4.00	1,865	7,460	\$40.69	\$303,547.40
		GS-11	1	4.00	1,865	7,460	\$49.61	\$370,090.60
	Full Investigation	GS-12	3	3.81	274	3,132	\$59.02	\$184,840.02
		GS-13	3	3.81	274	3,132	\$70.18	\$219,791.13
	2022 Total			8	–	4,278	21,184	–
All Years	TOTAL		8	–	12,834	63,552	–	\$3,234,807.42
	Annual Average		8	–	4,278	21,184	–	\$1,078,269.14

- The total estimated labor cost to the Federal Government is \$3,234,807.42 [\$1,078,269.14 per year * 3 years = \$3,234,807.42].
- The annual estimated labor cost to the Federal Government is \$1,078,269.14 [\$3,234,807.42 / 3 years = \$1,078,269.14].
- The total estimated cost to the Federal Government, including IT costs and staff support is \$5,717,460.24 [\$3,234,807.42 in total labor costs + \$2,482,652.82 in total IT costs (\$827,550.94 per year for three years)].

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

The previously approved version of this ICR included the following annual burden estimates:

- 627,264 annual respondents.

- 205,412 annual burden hours.
- \$6,066,345 in annual labor costs.
- Overall Federal Government cost of \$52,000,000, including staff, IT, and overhead costs.

The current ICR estimates the following:

- 51,875 annual respondents.
- 69,512.5 annual burden hours.
- \$2,942,464.13 in annual labor costs.
- Overall Federal Government cost of \$5,717,460.24, including labor costs and IT support.

As can be seen, there have been significant decreases in the number of respondents, burden hour estimates, labor costs to the industry, and costs to the Government. Reasons for these changes are described below.

First, the original iteration of this ICR included the Government’s costs associated with the development, roll-out, and implementation of URS. Those costs are not reflected in this ICR. Instead, estimated costs for ongoing IT maintenance and support of the existing system are included.

Next, FMCSA has experienced delays in rolling out Phase II of URS (which applies to *existing* registrants) and has indefinitely suspended the effective date of URS requirements for such entities. Phase I of URS, which became effective on December 12, 2015, impacts only first-time (*new*) applicants seeking an FMCSA-issued registration. In the original iteration of this ICR, it was expected that Phase II of URS would move forward according to schedule, which would require *all* entities subject to FMCSA licensing and registration requirements (both new and existing registrants, an estimated 627,264 per year) to apply for additional authorities and submit biennial update information via URS (see Item 1 for additional information on this topic). However, due to delays in rolling out Phase II of URS, *existing* registrants must still use the OP-1 series of forms (entirely separate from Form MCSA-1, covered by OMB Control No. 2126-0016, “Licensing Applications for Motor Carrier Operating Authority”) to apply for additional authorities and the MCS-150 (covered by OMB Control No. 2126-0013, “Motor Carrier Identification Report”) to submit their biennial updates. Thus, only *new* registrants (an estimated 51,875 per year, based on the calculations in the current supporting statement) are required to submit Form MCSA-1. FMCSA is assuming that this will be the case for the 3-year period covered by this ICR. This has resulted in a *decrease* in the estimated number of annual MCSA-1 responses of 575,389 (51,875 estimated annual responses in the current iteration of this ICR – 627,264 estimated annual responses in the previous iteration of this ICR = –575,389).

The decrease in estimated burden hours is a direct result of the decreased estimate of annual responses.

Finally, the changes in labor cost to the industry reflect a) the decreased estimate of annual respondents, and b) a change in the methodology used to estimate hourly wages for carrier

compliance officers, which resulted in an increase in hourly wage of \$13.06 per hour. See Item 12 for a description of the methodology used to estimate loaded hourly wages for carrier compliance officers.

16. PUBLICATION OF RESULTS OF DATA COLLECTION

FMCSA uses a portion of the collected data to prepare a public notice of the registration application, which is published in the “FMCSA Register.” Publication of this notice initiates a 10-day period during which an interested party may file a complaint seeking denial of the registration on a limited number of statutory grounds. Additionally, excerpts of the registration information are available through the Agency’s Safety Measurement System (SMS) website, and the SAFER website. Motor carrier safety profiles are available to the public under the Freedom of Information Act (FOIA).

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

FMCSA is not seeking an exemption from displaying the expiration date.

18. EXCEPTIONS TO CERTIFICATION STATEMENT

None.

ATTACHMENTS:

- A. 49. U.S.C. § 13902. *Registration of Motor Carriers*
- B. 49. U.S.C. § 13903. *Registration of Freight Forwarders.*
- C. 49. U.S.C. § 13904. *Registration of Brokers.*
- D. Final Rule titled “Unified Registration System,” (78 FR 52608, dated August 23, 2013)
- E. Final Rule titled “Unified Registration System; Suspension of Effectiveness,” (82 FR 5292, dated January 17, 2017)
- F. 49. U.S.C. § 13901. *Requirements for Registration.*
- G. 49 U.S.C. 31136
- H. 5 U.S.C. 552
- I. Privacy Impact Assessment: Federal Motor Carrier Safety Administration (FMCSA) Unified Registration System (URS) Final Rule