

SUPPORTING STATEMENT FOR
49 CFR 566, MANUFACTURER IDENTIFICATION
OMB CONTROL NO. 2127-0043

Introduction:

1. This information collection is mandatory for all manufacturers of motor vehicle and motor vehicle equipment subject to the Federal motor vehicle safety standards (FMVSS).
2. The respondents to this information collection are manufacturers of motor vehicle and motor vehicle equipment subject to the FMVSS.
3. This information collection requires submission of information to NHTSA.
4. The information is only submitted once unless the information in the original submission needs to be updated.
5. Each manufacturer of motor vehicle and motor vehicle equipment subject to the FMVSS must submit identification information and information about the type of motor vehicles and/or motor vehicle equipment it manufactures.
6. NHTSA will receive the information and then NHTSA will make the information available to the general public on a NHTSA website.
7. The purpose of this information is to collect identification information to ensure that NHTSA is able to locate the manufacturer if a safety-related defect or noncompliance is suspected or found to exist in a motor vehicle or motor vehicle equipment.
8. The revision of this information collection includes the addition of a new type of regulated motor vehicle. NHTSA estimates that in each of the next three years, ten new replica manufacturers will submit identification information under Part 566. Additionally, the total burden hours increased from 131 to 223 hours and the cost increased from \$3,930 to \$10,809.61 The increase in cost is primarily due to using higher compensation rates and the increase in burden hours. The increase in burden hours accounts for the increase in number of submissions NHTSA receives annually.

A. JUSTIFICATION:

This information collection requires manufacturers of motor vehicle and motor vehicle equipment subject to the Federal motor vehicle safety standards to submit to NHTSA, on a one-time basis, their name and address, and a description of the products they manufacture to the standards, so that NHTSA can contact the manufacturer in the event that a safety-related defect or noncompliance with a safety standard should be found to exist in the product.

1. Explain the circumstances that make the collection of information necessary. Attach a copy of the appropriate statute or regulation mandating or authorizing the collection of information.

If a motor vehicle or item of replacement motor vehicle equipment contains a defect related to motor vehicle safety or fails to comply with an applicable Federal motor vehicle safety standard, the manufacturer is required under 49 U.S.C. § 30118 to furnish notification of the defect or noncompliance to the Secretary of Transportation, as well as to owners, purchasers, and dealers of the motor vehicle or replacement equipment, and to remedy the defect or noncompliance without charge to the owner. To ensure that manufacturers are meeting these and other responsibilities under the statutes and regulations administered by NHTSA, the agency issued 49 CFR Part 566, *Manufacturer Identification*.

The regulations in Part 566 require manufacturers of motor vehicles or motor vehicle equipment, other than tires, to which a Federal motor vehicle safety standard (FMVSS) applies, to submit to NHTSA, on a one-time basis, identifying information on themselves and on the products they manufacture to those standards. The information must be submitted no later than 30 days after the manufacturer begins to manufacture motor vehicles or motor vehicle equipment subject to the FMVSS. No specific form need be used for the submission of this information.

NHTSA provides an online portal with a fillable web-based format for use in submitting the required information. This is described in a handbook entitled *Requirements for Manufacturers of Motor Vehicles and Motor Vehicle Equipment* that can be accessed on the agency's website at <https://vpic.nhtsa.dot.gov>. A description of the reporting requirement is included on pages 8 and 9 of the handbook. With changes implemented in 2015, manufacturers have been able to make these submissions using an online portal on the above agency website. Manufacturers who have previously submitted identifying information must ensure that the information on file is accurate and complete by submitting revised information no later than 30 days after a change in the business that affects the validity of that information has occurred.

2. Indicate how, by whom, and for what purpose the information is used. Indicate actual use of information received from the current collection.

Manufacturers are required to submit to NHTSA the following information:

- (1) Full individual, partnership or corporate name.
- (2) The business name of the manufacturer commonly known to the public.
- (3) Residence address of the manufacturer and State of incorporation, if applicable.

- (4) Description of each type of motor vehicle or covered equipment item manufactured by the manufacturer, including, for motor vehicles, the approximate ranges of gross vehicle weight ratings (GVWR) for each type.

The manufacturer must keep entries current, accurate and complete by submitting revised information, not later than 30 days after any change affecting the validity of the information on file has taken place.

The above-identified information is used by NHTSA to locate the manufacturer if a safety-related defect or noncompliance is suspected or found to exist in a motor vehicle or motor vehicle equipment item. The manufacturer forwards the information to NHTSA by entering the information directly into the agency's online portal or by sending the information to the agency by mail, e-mail, or by fax transmission.

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

As previously noted, the required information can be submitted electronically using the online portal on the agency's website at <https://vpic.nhtsa.dot.gov>. Virtually all submissions are now being made in that manner.

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

Manufacturers are required to submit identifying information to NHTSA no later than 30 days after they begin to manufacture motor vehicles or motor vehicle equipment subject to the FMVSS. After that initial submission, manufacturers are not required to submit any additional identifying information unless a change occurs in the information already on file with the agency. It is necessary that this information be furnished by the manufacturer so that NHTSA has accurate identifying information to use in the event that a safety-related defect or noncompliance should be suspected or found to exist in one of the manufacturer's products. Any uncertainty as to the proper identification of the manufacturer could introduce unnecessary delays into the process of conducting any recall campaign that may be needed to address the defect or noncompliance. Manufacturers are not required to submit identifying information under any other regulation administered by NHTSA. As a consequence, there is no risk for duplication of effort on the manufacturer's part.

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

Most manufacturers of motor vehicles and regulated items of motor vehicle equipment qualify as small businesses. The regulations in Part 566 require each

such manufacturer to register with NHTSA. The information each manufacturer needs to provide is, however, very minimal, consisting of no more than the manufacturer's name, address, State of incorporation if applicable, and a description of each type of motor vehicle or item of regulated equipment that it manufactures, including, for vehicles, the gross vehicle weight rating. Owing to the limited nature of this information, there is no need for any special procedure to be in place to minimize the reporting burden on small entities.

6. Describe the consequence to Federal Program or policy activities if the information is not collected or collected less frequently.

If NHTSA were not to collect identifying information on manufacturers of the vehicles and equipment that it regulates, that would impair the agency's ability to notify the responsible manufacturer if the agency should suspect or find that a motor vehicle or equipment item contains a safety-related defect.

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

The information collection is fully consistent with the guidelines set forth in 5 CFR 1320.6.

8. Provide a copy of the FEDERAL REGISTER document soliciting comments on the conduct of the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

NHTSA is soliciting comments on this Information Collection in the NPRM proposing the requirements necessary to implement the replica motor vehicle program that will be published in the Federal Register.

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.

No assurance of confidentiality is given for the information collected under Part 566. All information provided to NHTSA for Part 566 purposes, consisting of the names and address of commercial entities and a description of the products they manufacture to the Federal motor vehicle safety standards, is considered public information. This precludes the need for any assurance of confidentiality to be given.

11. Provide additional justification for any questions on matters that are commonly considered sensitive.

The information which is requested of the manufacturer is not of a sensitive nature.

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

Based on the 2016 volume of submissions of manufacturer identifying information under 49 CFR Part 566, the agency projects that it will receive 892 submissions from approximately 831 manufacturers in each of the next three years. Assuming that it will take a manufacturer 15 minutes to prepare a letter containing the requested information or to complete the suggested form, the agency estimates that 223 hours (892 submissions x 0.25 hours/request = 223 hours) will be expended on an annual basis by all manufacturers required to submit Part 566 identifying information. The information is submitted only once unless there is a name change, or the business has relocated and/or has changed the type of vehicles or equipment it manufactures.

NHTSA estimates the labor cost for compiling and submitting the required information to be \$33.98 per hour using the Bureau of Labor's mean hourly wage estimate for technical writers in the motor vehicle manufacturing industry (Standard Occupational Classification # 27-3042). Assuming that it costs \$33.98 per hour to prepare the information, the estimated wage costs associated with the burden hours required to prepare the Part 566 submissions on the part of all affected entities is approximately \$7,577.54 (223 hours x \$33.98/hour = \$7,577.54).

The total hourly wage cost associated with this information collection is \$7,577.54. The Bureau of Labor Statistics estimates that for private industry workers, wages represent 70.1% of total compensation. Therefore, the total cost associated with the hourly burden of this information collection is estimated to be \$10,809.61

Number of Respondents	Number of Responses	Burden Hours Per Response	Total Burden Hours	Labor Costs Per Burden Hour	Total Labor Costs
831	892	.25 hours (15 mins)	223	\$48.47	\$10,809.61

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

There are no additional costs to respondents or record-keepers. This is a reduction of \$3,930. When NHTSA last sought approval for this collection, we incorrectly included \$3,930 in labor costs associated with the burden hours as annual costs to respondents.

Because NHTSA is now proposing to amend 49 CFR Part 566 to allow electronic submission of the required information, the annual costs to respondents would be expected to go down. However, NHTSA had not previously accounted for printing and mailing costs and already begun allowing manufacturers to submit the information electronically. Because NHTSA expects all manufacturers to submit the information electronically, NHTSA estimates that there are no annual costs to respondents.

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

As the information submitted under 49 CFR Part 566 is an integrated component of several data systems, NHTSA maintains a team of personnel who manage the program associated with the processing of manufacturer identifying information to meet timeliness, accuracy and quality requirements for public, industry and government needs. The team of federal personnel includes a senior program analyst GS-14 and two full time GS-4 office automation employees along with assigned contract personnel. The GS-4 office automation personnel receive a maximum annual salary of \$44,097 each for processing these requests and contribute 100% and 50% of their time, respectively, in support of the program. The annual salary for these personnel is estimated at \$66,145.50. To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics estimate that wages and salary only represent 62.4% of total employee compensation cost for State and local employees. Accordingly, NHTSA estimates the cost to the government for processing to be \$106,002.40. The senior program analyst assigned to the program is a GS-14 who serves as the oversight authority on the processing and acceptance of submissions; a contact point when routing unique cases to the compliance division; an industry expert for specific advanced questions; and the primary contracting officer representative (COR) for contract resources associated with the team, both for IT and process support. The senior staffer assigned to this program spends an estimated 7.5% of his time supporting and managing the 49 CFR Part 566 process. Based on a GS-14, step 6 salary of \$136,725, and accounting for the fact that NHTSA estimates that wage and salary only represent 62.4% of total compensation costs, NHTSA estimates that the cost for the senior staffer's responsibilities in overseeing the processing and acceptance of submissions, is \$16,433.29 annually.

In addition, supporting contract resources are used in the program to facilitate system management, workflow, helpdesk and data processing. It is important to note that NHTSA has employed contract resources to facilitate a full Tier 1 helpdesk for the program to ensure that manufacturers, data users and the general public have a proper contact point during normal business hours to support a

quality customer service experience through the submission process when the limited federal staff are not available. This ensures the federal staff resource load is focused on the authoritative requirements inherent in the process versus general support needs that can be outsourced. Contract support resources for the 49 CFR Part 566 program are estimated to cost \$110,000 annually to facilitate expedited processing to meet the needs of both industry and the government. Additional system operation and maintenance (O&M) costs are required to support the electronic system required to maintain the program, which includes server, application and data management costs.

Lastly, this program is supported by a shared service information technology (IT) application that is an integrated system and data component for several other processes throughout the agency. The investment that makes up the IT solution is a component based platform of which the support piece that meets the 49 CFR Part 566 process is only a part. As a result, an estimated cost for O&M for this subcomponent for the required level of effort to maintain the IT system would be \$95,000 annually, which is a share of the overall IT investment and cannot be separated from the overall system maintenance requirement. This derives from the fact that the IT component for supporting 49 CFR Part 566 is not a standalone platform, but an integrated module in a larger system known as the Crash Data Acquisition Network (CDAN).

As a general rule, costs for contract resources and platform support vary because resource load to support submission review and acceptance is dependent upon the volume of receipts, which increases and decreases as industry changes and expands. In addition, there are routine technology changes based on needs and enhancements required for processes to ensure the data use and experiences of all users are improved and/or optimized to meet the current needs. With all these factors in mind, total annual costs for supporting the 49 CFR Part 566 program are estimated at \$327,435.69 based on current salary, technology and resource costs.

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

The primary difference in this information collection request from the previous submission is that the agency is proposing to update 49 CFR 566 to allow manufacturers to submit the required information electronically. NHTSA has already begun allowing the alternative submission as it reduces processing delays and reduces burdens on respondents. Allowing electronic submissions reduces burdens associated with submissions associated with printing and mailing costs. Although this collection reduces the annual costs to respondents from \$3,930 to \$0, this change is not a result of the reduced printing and mailing costs, which NHTSA had not appropriately accounted for in our last request. Instead, the reduction from \$3,930 to \$0 is a result of NHTSA having incorrectly included labor costs associated with the burden hours as annual costs to respondents. Because NHTSA estimates that all respondents will submit the information

electronically, NHTSA also estimates that there will be no additional costs to annual respondents.

This information collection also now includes one new category of manufacturers. The type of information collected will remain the same, but it is expected to increase the overall number of respondents. When it last sought approval for this information collection, the agency projected that it would receive approximately 523 Part 566 submissions each year. NHTSA received 882 submissions in 2016 from 821 manufacturers. Due to the increase of submissions and implementation of the replica vehicle program, the agency projects that it will receive, on average 892 submissions in the next three years from 831 manufacturers. The increase in the number of submissions leads to an increase in the in the projected burden hours from 131 hours to 223 hours. Of the increase in burden by 92 hours, 89.5 hours is an adjustment based on NHTSA's estimates and 2.5 hours is a result of the proposed revision to 566 to accommodate submissions by replica vehicle manufacturers.

NHTSA's replica vehicle NPRM proposes minimal changes to Part 566 to implement the NHTSA's replica vehicle program. The changes would add replica motor vehicles as a type of motor vehicles manufactured and would require replica manufacturers to submit Part 566 information electronically. Manufacturers that do not produce replica manufacturers would still have the option to submit Part 566 information by mail. The only estimated burden change from the NPRM would be the additional submissions from replica vehicle manufacturers. NHTSA estimates that there will be 10 additional manufacturers submitting 566 information annually and this change is accounted for in the increase from 523 submissions to 892 submissions. The 10 additional manufacturers represent an additional 2.5 hours of burden.

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

The information submitted under Part 566 is posted to the agency's website at <https://vpic.nhtsa.dot.gov>. It is not published in any other form.

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.

NHTSA does not seek such approval.

18. 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 statement are made.