

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

**Supporting Statement A  
Beyond Compliance**

**INTRODUCTION**

This Supporting Statement has been developed to request the Office of Management and Budget's (OMB's) review and approval of a new information collection request (ICR) to implement the *Beyond Compliance Program*, required by Section 5222 of the Fixing America's Surface Transportation Act (FAST Act)(Pub. L. 114-94, 129 Stat. 1312, Dec. 4, 2015)(49 U.S.C. 31100 note).

**Part A. Justification**

**1. CIRCUMSTANCES THAT MAKE COLLECTION OF  
INFORMATION NECESSARY**

Section 5222 of The Fixing America's Surface Transportation Act (FAST Act) requires the Federal Motor Carrier Safety Administration (FMCSA) to allow recognition, including credit or an improved Safety Measurement System (SMS) percentile, for motor carriers that:

1. Install advanced safety equipment;
2. Use enhanced driver fitness measures;
3. Adopt fleet safety management tools, technologies, and programs; or
4. Satisfy other standards determined appropriate by the Administrator.

These four actions are indicative of a motor carrier whose safety programs go "beyond compliance" with the minimum safety regulations mandated by FMCSA. The Beyond Compliance program would incentivize motor carriers to incorporate those actions into their safety programs. The FAST Act also requires the FMCSA Administrator to carry out the Beyond Compliance provisions listed above through, the following, to include among other things:

1. Developing a process for identifying elements of technology and safety programs as a basis for recognition.
2. Seeking input from stakeholders.
3. Authorizing utilizing a third party for a monitoring program.

#### 4. Providing a report to Congress

The primary purpose of this ICR is to perform an exploratory analysis on how motor carriers view the relative importance of various motor carrier safety program elements that lead to safe operations (Attachment A). The input received from motor carriers will supplement information already gathered from in-depth interviews on motor carrier safety programs with nine high-performing carriers.

To accomplish this, the study will complete the following objectives:

1. Identify high-performing carriers in terms of safety performance.
2. Determine the safety technologies, programs, and policies employed by these carriers.

The data being collected for this study consists of responses from a select group of motor carriers on the most effective technologies, programs, and policies for achieving safe operations. The study is an exploratory analysis that relies on input from carriers that exhibit safe operations exceeding industry averages as indicated by driver out-of-service rates, vehicle out-of-service rates, and crash rates. To identify these carriers, the study will utilize existing data from the Motor Carrier Management Information System (MCMIS) database.

## **2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED**

### **2.1 HOW INFORMATION WILL BE COLLECTED**

Data will be collected electronically from a sample of motor carriers with safety performance that exceed those of their peers. Those carriers are identified by examining DOT reportable crash rates, driver out-of-service rates (OOS) at roadside inspections, and vehicle out-of-service rates at roadside inspections as captured in the MCMIS database. Only those carriers that perform near the top quartile across all three categories and that have had at least 3 inspections are potential participants.

Based on an analysis of information in the MCMIS database, eligible carriers must have driver out-of-service rates less than or equal to 0.005 total inspections with a driver OOS violation per total driver inspections; vehicle out-of-service rates less than or equal to 0.0900 total inspections with a vehicle OOS violation per total vehicle inspections; and reportable crash rates less than or equal to 0.0100 reportable crashes per total power units. Preliminary results show that 24,152 carriers are eligible to participate based on these thresholds.<sup>1</sup>

The project team intends to sample high-performing carriers across three different strata based on size ( $n_1 + n_2 + n_3 = 24,152$ ). Strata 1, large carriers (100 or more power units), contains 126 observations ( $n_1 = 126$ ); strata 2, medium carriers (10-99 power units), contains 2,717 observations ( $n_2 = 2,717$ ); and strata 3, small carriers (1-9 power units), contains 21,309

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<sup>1</sup> This estimate is based on an November 2018 analysis of the MCMIS database.

observations ( $n_3 = 21,309$ ). Of the 21,309 carriers in this population, a total of 225 will be sampled randomly across each strata ( $X_1 + X_2 + X_3 = 225$ ) using the following sampling sizes:

- Large ( $X_1 = 75$  carriers, selected at random).
- Medium ( $X_2 = 75$  carriers, selected at random).
- Small ( $X_3 = 75$  carriers, selected at random).

The reason for equal sample sizes ( $X_1 = X_2 = X_3 = 75$ ) across the strata and for not sampling proportionate to the fraction of the overall population is to improve representation across the Medium and Large carrier size categories. The number of observations in those groups are much smaller than the Small carrier group. If they are not sampled at higher rates relative to their proportions of the overall population of high-performing carriers, the study could potentially miss important insights that are specific to those groups. In addition, Medium and Large carriers are likely to have more firsthand experience with the range of safety technologies that are being investigated as part of this study.

Once the survey is administered and the results collected, the mean responses will be examined in order to determine if there are variations by response by strata (i.e., carrier size). If so, the project team will post-stratify the results using the proportion of carriers by size in the population of high-performing carriers. This help to reduce the variance in the mean carrier scores across safety program elements. In this manner, the project team will be able to collect enough data to analyze carrier responses both within and across the strata.

Despite that some carriers will not respond to the survey request, the project team believes that we will be able to achieve a 50 percent response rate. This belief is based on the following factors: the observed response rates achieved by other researchers investigating the motor carrier industry<sup>2,3,4</sup>; the significant outreach effort that the team intends to perform as part of this information collection; and, the opportunity to help shape an FMCSA program that provides incentives to carriers. The 225 randomly selected carriers will be asked to participate in the study, with a goal of 112 responses.

Carriers will initially be contacted via email using the contact information in the MCMIS database. Participants would first be invited to participate in an online webinar that explains the primary evaluation design (i.e., analytic hierarchy process, or AHP, which is described in detail in the paragraphs that follow). The project team believes it would be useful to conduct an information session via webinar, as opposed to solely relying on written instructions, since participants may not know how to proceed through the pairwise comparisons. The webinar gives the project team an opportunity to provide examples and to answer any questions. The webinar

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<sup>2</sup> A study of motor carrier safety adoption patterns in the U.S. conducted a survey of large carriers that yielded a response rate of 50.55 percent. Cantor, D., Corsi, T., & Grimm, C. (2006) Safety Technology Adoption Patterns in the U.S. Motor Carrier Industry. *Transportation Journal*, (45) 3, 20-45.

<sup>3</sup> A study of motor carrier satisfaction with an online credentialing and tax payment system in Kentucky yielded a response rate of 19 percent. Langley, R. & Grossardt, T. (2004). 2003 Motor Carrier Survey. Report No. KTC04-03/SPR263-02-1F. Kentucky Transportation Center. [https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1218&context=ktc\\_researchreports](https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1218&context=ktc_researchreports).

<sup>4</sup> A study of motor carrier satisfaction with electronic data interchange (EDI) technology yielded a response rate of 47.1 percent. Crum, M., Premkumar, G., & Ramamurthy, K. (1996). An assessment of motor carrier adoption, use, and satisfaction with EDI. *Transportation Journal*, 44-57.

would be conducted multiple times and participants would be given the option to select the one that best suits their schedules. In addition to the webinar, an online video will be made available to participants that explains the AHP. Once participants complete the webinar or view the video, they will be given a link to complete the survey online (Attachment B) using the online survey tool Qualtrics.

In addition to the initial outreach by email to the selected carriers, the project team will also send email reminders. The email reminders will help to boost the response rate by encouraging carriers that have not completed the survey to do so. Given that motor carriers are undoubtedly busy with the day-to-day activities of operating a business, email reminders are essential to helping the project team achieve the targeted response rate.

AHP is a tool for dealing with complex decision-making that employs a series of structured, pairwise comparisons in which respondents must express a preference for one alternative over another according to various evaluation criteria. In the context of Beyond Compliance, the AHP-based survey would work by presenting carriers with various potential elements of safety programs (such as deploying roll-over stability control technology on vehicles, screening drivers for sleep disorders, or mandatory training in the event of a crash) and allow them to systematically compare those elements. The systematic comparison of those elements, via the AHP, will reveal those safety program elements that high-performing carriers consider most important.

Because there are a wealth of technologies, policies, and practices that may be incorporated into a safety program, the project team first conducted a literature review of carrier safety programs in order to identify elements that have documented safety benefits. Using that knowledge, the project team then conducted nine in-depth interviews with high-performing carriers to better understand their experiences with the various safety program elements identified in the literature review. From the literature review and the interviews, the project team identified seven broad safety program areas and their major elements that are key to a successful safety program. Carrier experiences with these safety program elements are the subject of this information collection. As shown in Table 1, as illustrated by examples, these are:

- Advanced Safety Equipment;
- Fatigue Management;
- Driver Training;
- Hiring Practices;
- Data Analytics;
- Safety Culture; and
- Safety Incentives/Discipline.

**Table 1. Safety program elements exceeding regulatory requirements.**

<b>Safety Program Areas</b>	<b>Advanced Safety Equipment</b>	<b>Fatigue Management</b>	<b>Driver Training</b>	<b>Hiring Practices</b>	<b>Data Analytics</b>	<b>Safety Culture</b>	<b>Safety Incentives/ Discipline</b>
Safety Program Elements	<ul style="list-style-type: none"> <li>• Rollover Stability</li> <li>• Collision Avoidance</li> <li>• Lane Departure Warning</li> <li>• Video-Based Safety Monitoring</li> <li>• Blind Spot Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Sleep Disorder Screening</li> <li>• Sleep Disorder Compliance Monitoring</li> <li>• Active Sleep Disorder Program</li> <li>• Internally Modified Hours-of-Service Rules for Daytime and Nighttime Driving</li> </ul>	<ul style="list-style-type: none"> <li>• Finishing Training</li> <li>• Sustainment Training</li> <li>• Post-Crash/ Incident Training</li> <li>• Simulation-based Training</li> </ul>	<ul style="list-style-type: none"> <li>• Pre-Employment Screening</li> <li>• Drug Testing</li> <li>• Physical Functions Testing</li> <li>• Qualifying Road Test</li> </ul>	<ul style="list-style-type: none"> <li>• Predictive Analytics for Safety Performance</li> <li>• Data Driven Risk Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Safety as a Core Corporate Value</li> <li>• Attempt to Measure Safety Culture</li> </ul>	<ul style="list-style-type: none"> <li>• Rewards for Safe Driving</li> <li>• Discipline for Unsafe Driving</li> </ul>

The survey results will be analyzed to determine the safety program elements that were most frequently scored the highest across participants. The resulting information will reveal the elements of safety programs that these motor carriers perceive to be the most effective for achieving safety. By examining any potential variations in responses across motor carriers by size (small, medium, and large), FMCSA will be better positioned to develop an effective Beyond Compliance program.

## **2.2 WHO WILL COLLECT THE INFORMATION**

The data collection effort will be performed by MaineWay Services and Cambridge Systematics, Inc. once approval to conduct the study and collect the proposed information has been approved.

## **2.3 PURPOSE OF THE INFORMATION COLLECTION EFFORT**

The purpose of the data collection and the overall study is to identify those technologies, programs, and policies that are perceived to be most effective for achieving safe operations to support the implementation of a Beyond Compliance program as mandated by the FAST Act.

## **2.4 SUPPLEMENTAL OUTREACH TO SMALL CARRIERS**

As a supplement to the data collection, the National Association of Small Trucking Companies (NASTC) and Owner-Operator Independent Drivers Association (OOIDA) will be invited to reach out to their members concurrently with the administration of the survey. The purpose of this supplement is to incorporate recommendations from the 60-day notice which suggested that there could be unique challenges faced by smaller carriers and that outreach to this segment of the industry will help to provide greater context to the results of the primary data collection. The NASTC and OOIDA will be invited to reach out to their safest member companies to identify the alternative means of training, monitoring and systematizing and ensuring safe operations that exceed the letter of the law. The NASTC and OOIDA will be asked to identify the safest member companies as those with best practices relating to:

- Safety Culture implementation;
- Driver training;
- Driver performance tracking and problem mitigation strategies;
- Hardware and software technologies being utilized; and
- Other strategies to assure safe operations.

Additionally, the NASTC and OOIDA would be asked to specify the following from the companies included in the supplement:

- What recognition or other incentives would encourage participation in a Beyond Compliance Program; and
- How the program framework could deal with potential costs of participation and ongoing monitoring of safety performance of enrolled carriers.

## **3. EXTENT OF AUTOMATED INFORMATION COLLECTION**

The methods for data collection have been automated when possible, as identified by the research team. All data will be collected electronically, with varying degrees of manual input necessary.

## **4. EFFORTS TO IDENTIFY DUPLICATION**

The research team conducted a review of previously completed FMCSA studies, related studies and surveys, and reports of Federal and non-Federal sources. The research team selected 24 out of a total of 106 documents from the relevant literature and conducted a detailed review. The team discovered many different factors that contribute to commercial vehicle safety, each with its own set of associated technologies and safety practices. Some technologies and practices are intended to improve crashworthiness, or to minimize injuries in the event of a crash (often called “passive safety”). Other technologies and safety measures are designed to reduce the likelihood or severity of a crash (often called “active safety”).

These studies described several patterns in the recent development of driver assistance technologies. Many of the technologies developed in the 1980s and 1990s used internal sensing of vehicle systems and vehicle motion to improve and maintain stability and control, such as speed limiter devices and electronic stability control.

A newer generation of technologies, developed mostly in the 1990s and 2000s, introduced a variety of external sensors such as GPS, video, radar, and lidar to provide information to drivers about navigation and potential conflicts outside the vehicle. These advanced driver assistance systems (ADAS), such as forward collision warning and lane departure warning, are relatively mature and widely available; however, they exceed current safety standards or requirements in the United States yet have not been regulated.

Finally, a new generation of ADAS are implementing more advanced processing of external sensing data or combined multiple sensing systems to automate certain vehicle functions (often in safety-critical situations). These technologies, such as automatic emergency braking and lane keeping assist, are improving rapidly and are some of the early building blocks of vehicle autonomy, but many have demonstrated the potential to improve safety even in their current forms.

As part of this literature review, the research team also identified the most common vendors used by carriers to implement ADAS and other safety technologies. Two of the leading vendors offer a range of integrated safety products that were used in a recent field study of heavy-vehicle crash avoidance systems. Two other major vendors specialize in video-based onboard monitoring systems while taking advantage of other in-vehicle safety systems.

## **5. EFFORTS TO MINIMIZE BURDEN ON SMALL BUSINESSES**

Based on Small Business Administration size standards, FMCSA has determined that motor carriers of property with 148 power units or fewer, and passenger carriers with 93 power units or fewer, are small businesses.<sup>5</sup> This information collection effort will minimize the burden on small business by collecting the data electronically. This will reduce the time required for providing data. The impacts to small businesses are also minimized because participation in this study does not require participants to purchase any equipment or commit any financial resources beyond their time.

## **6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION**

FMCSA is requesting a one-time collection of data for the Beyond Compliance study as mandated by the FAST Act. Currently, there is no existing data set that can be used for this project. Not collecting this data would result in the failure of FMCSA to fulfill the congressional

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<sup>5</sup> FMCSA Carrier Safety Fitness Determination Notice of Proposed Rulemaking. See 81 FR 3596, Thursday, January 21, 2016, available at <https://www.gpo.gov/fdsys/pkg/FR-2016-01-21/pdf/2015-33153.pdf> .

mandate to develop a Beyond Compliance program, as specified in Section 5222 of the FAST Act.

## **7. SPECIAL CIRCUMSTANCES**

There are no special circumstances related to this information collection.

## **8. COMPLIANCE WITH 5 CFR 1320.8**

In compliance with 5 CFR 1320.8, a sixty (60) day notice was published in the *Federal Register* on December 18, 2019 (84 FR 69451). In total, eight (8) comments were received from industry associations, technology providers, and a private individual. The private individual did not support the information collection and articulated that they did not perceive a Beyond Compliance program as an improvement to motor carrier safety. The National School Transportation Association submitted a letter supporting the Agency's proposal to conduct the information collection.

Comments from the American Trucking Association (ATA), the Motor & Equipment Manufacturers Association (MEMA), the National Association of Chemical Distributors (NACD), and the National Association of Small Trucking Companies (NASTC) indicated general support of the information collection and the Beyond Compliance program. The MEMA did not propose any changes to the information collection. However, the ATA recommended that any survey tool designed to isolate the best voluntary safety practices of motor carriers ought to clearly define what standards and measures it uses to qualify a safety technology, tool, or program (STTP) as motor carriers are engaged in a wide range of technological, program, and policy-based interventions. The ATA further recommended that the FMCSA obtain qualitative feedback from industry safety professionals on the selection of STTPs in order to refine the methodological robustness of its selected measures.

In developing the methodological approach for the information collection, FMCSA first performed a literature review that identified various STTPs used by motor carriers. Also, FMCSA conducted one-on-one interviews with a small group of industry safety professionals to better understand the current state of the practice for motor carrier safety. Those initiatives have already addressed the concerns articulated by the ATA.

The NACD and NASTC also recommended changes to the information collection. Both the NACD and NASTC stated that there are flaws in the MCMIS database on which the proposed sample is based. Furthermore, the NACD stated that the proposed sample size is small relative to the large community of motor carriers. Additional comments were made pertaining to the Safety Measurement System (SMS) and the Compliance Safety Accountability (CSA) program which, though they may be well-founded, are not germane to this information collection. Both the NACD and NASTC suggested that these perceived limitations may result in the omission of smaller carriers, an unrepresentative sample, and potentially invalid conclusions.

As an improvement, the NACD recommended that FMCSA open the survey to all who wish to participate. The NASTC recommended that FMCSA prioritize and proportionately sample



carriers with fewer than 100 power units and independent owner-operators as well as adopt an at-fault crash standard for motor carrier sample selection. Furthermore, the NASTC recommended that FMCSA obtain an alternative or supplemental source of information on carrier safety practices and policies to incorporate into the proposed analysis.

Comments from the Owner-Operator Independent Drivers Association (OOIDA) did not indicate support for the proposed information collection. The OOIDA stated that FMCSA should not rely on MCMIS data for sample selection due to flaws in the database. The OOIDA also indicated that the proposed information collection focuses too heavily on safety technologies and not enough focus is placed on driver compensation, retention, and training. As an improvement to the proposed information collection, the OOIDA recommended that the information collection include driver training, driver retention, and accident-free miles driven.

In response to the NACD, NASTC, and OOIDA comments, FMCSA has included in the information collection a supplement, described in section 2.4, that focuses on small carriers. The information collection proposes to engage those carriers through the associations that are representative of this industry segment. For this industry segment, the supplement will provide improved understanding and documentation of the alternative means of training, monitoring and systematizing and ensuring safe operations that exceed the letter of the law

Lytix, Incorporated (Lytix), a transportation technology company, indicated support of the information collection. However, Lytx stated that the proposed information collection should not be limited to motor carriers. Specifically, Lytx identified research studies that have conducted before-and-after analyses of the effectiveness of various transportation safety technologies and indicated that the incorporation of these types of studies into the information collection would improve its quality. Lytx recommended that technology providers also be included in the information collection. However, as previously described, FMCSA conducted a literature review prior to the development of the methodological approach for the information collection that included peer-reviewed studies on the effectiveness of transportation safety technologies. That initiative has already addressed the concern raised by Lytx.

The thirty (30) day FR notice (85 FR 50875) was published on August 18, 2020.

## **9. PAYMENTS OR GIFTS TO RESPONDENTS**

No payments or gifts will be made to respondents.

## **10. ASSURANCES OF CONFIDENTIALITY**

This collection will be kept private to the extent permitted under law. Data will be treated in a secure manner and will not be disclosed, unless FMCSA is otherwise compelled by law to do so. The research team members have signed nondisclosure agreements to ensure confidentiality. We will explain this assurance of confidentiality during the webinar as the on-line survey instrument will be anonymous, with representatives indicating only responses to questions. No information will be released that will allow one to identify any participating motor carrier.

## 11. JUSTIFICATION FOR THE COLLECTION OF SENSITIVE INFORMATION

No sensitive information will be collected as part of this study.

## 12. ESTIMATES OF BURDEN HOURS FOR INFORMATION REQUESTED

Though FMCSA seeks a target of 112 motor carriers to participate in the study, the estimated 50 percent response rate implies that approximately 112 out of 225 carriers that are sampled will actually participate. The burden for a participating carrier is associated with several tasks that are presented in chronological order: (1) read the email invitation; (2) attend the webinar which describes the survey process; (3) open the survey and read the directions; (4) complete the survey; (5) and read the email reminders.

For the burden analysis, we assume that all 225 of the carriers that are sampled will read the email invitation. However, approximately half of them (113 carriers) will not respond. We also assume that those 113 carriers will read the email reminders asking them to complete the survey, but again will not respond. The estimated amount of time to complete each task and the estimated total burden hours for the ICR is presented in Table 2Error: Reference source not found.

**Table 2. Burden hours by year.**

Year	Form	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Total Annual Burden
1	Email Invitation	225	1	5 minutes	19 hours
1	Webinar	112	1	10 minutes	19 hours
1	Survey Instructions	112	1	5 minutes	9 hours
1	Survey	112	1	40 minutes	75 hours
1	Email reminder #1	225	1	5 minutes	19 hours
	Email reminder #2	113	1	5 minutes	9 hours
<b>Total*</b>					150 hours
<b>Annualized</b>					150 hours

\*Total may not equal the sum of items due to rounding.

It is assumed that transportation/operational managers, or an equivalent position, will undertake this task. The mean hourly wage of Transportation, Storage, and Distribution Managers for the

truck transportation industry (NAICS code 484100), \$46.94, is taken from the BLS May 2016 National Industry-Specific Occupational Employment and Wage Estimates.<sup>(6)</sup>

To arrive at a loaded wage<sup>7</sup>, we first calculated the load factor by dividing the average value of the total cost of compensation for private industry workers of the trade, transportation, and utilities industry by the average cost of hourly wages and salaries as reported by the BLS in its Employer Costs for Employee Compensation for June 2017 (\$27.68 total compensation cost / \$19.46 wage and salary = 1.422).<sup>(8)</sup> Multiplying the mean hourly wage for transportation, storage, and distribution managers in the truck transportation industry by the load factor results in a loaded wage hourly cost of \$66.75 (\$46.94 x 1.422 = \$66.75) as shown in Table 3.

**Table 3. Estimated wage and compensation of first-line supervisors.**

Occupation	BLS Occupation Code	NAICS Occupational Designation	Mean Hourly Wage	Load Factor	Hourly Compensation Cost
Transportation, Storage, and Distribution Managers	11-3071	General Freight Trucking (484100)	\$46.94	1.422	\$66.75

A motor carrier that completes the survey is expected to incur a one-time survey cost of \$72.31 (\$66.75 hourly compensation cost x [5 minutes per email invitation + 10 minutes per webinar + 5 minutes per survey instructions + 40 minutes per survey + 5 minutes per email reminder #1] = \$72.31). The 112 motor carrier participants are expected to incur a combined total cost of approximately \$8,098 = \$72.31 x 112 motor carriers).

In addition to the carriers that choose to participate, there are additional carriers that choose to not participate but are still solicited. Those carriers will receive and may read the initial email invitation as well as the email reminders. A motor carrier that does not complete the survey is expected to incur a one-time cost of \$16.70 (\$66.75 hourly compensation cost x [5 minutes per email invitation + 5 minutes per email reminder #1 + 5 minutes per email reminder #2] = \$16.70). The 113 motor carriers are expected to incur a combined total cost of approximately \$1,887 (\$16.70 x 113 motor carriers). The total costs for both participating and non-participating carriers are shown in Table 4.

<sup>6)</sup> Bureau of Labor Statistics. Occupational Employment Statistics, May 2016 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484100 – General Freight Trucking. 11-3071 Transportation, Storage, and Distribution Managers. <https://www.bls.gov/oes/current/oes113071.htm> (accessed September 15, 2017).

<sup>7)</sup> Loaded wages include the average value of fringe benefits, health insurance, and facilities and administrative costs in addition to the base salary.

<sup>8)</sup> Bureau of Labor Statistics. “Table 10. Employer costs per hour worked for employee compensation and costs as a percentage of total compensation: private industry workers, by industry group, June 2017.” <https://www.bls.gov/news.release/ecec.t10.htm> (accessed September 15, 2017).

**Table 4. Motor carrier burden hours and costs.**

Year	Carrier	Loaded Average Hourly Wage Rate	Number of Respondents	Total Burden Hours	Total Labor Cost
1	Participating	\$66.75	112	122 hours	\$8,098
	Non-Participating		113	28 hours	\$1,887
<b>Total</b>			225	150 hours	\$9,985
<b>Annualized</b>			225	150 hours	\$9,985

**Estimated Number of Respondents:** 112 participating carriers and 113 non-participating carriers

**Estimated Total Burden Hours:** 150 hours (65 minutes per participating carrier and 15 minutes per non-participating carrier)

**Estimated Total Annual Burden:** \$9,985

**Estimated Annualized Cost of Burden Hours:** \$9,985

### **13. ESTIMATE OF TOTAL ANNUAL COSTS TO PARTICIPANTS**

There are no additional costs to respondents.

The total cost for the research design, protocol development, review of literature, and recruitment of motor carrier and driver participants is \$225,000.

### **14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT**

The research design, protocol development, and implementation of the research methods will be completed between May 1, 2017 and November 30, 2018. The total cost for the study/contract is \$225,000. There is no specific cost to the government for government personnel incurred by this study, as all government personnel are working within their normal position duties. It is estimated that the contracting officer’s representative (COR)/project lead will spend an average of 10 percent of their time on this project throughout the period of performance, which is 18 months. Calculations for estimating employee compensation over one year for the COR is shown in Table 5.

**Table 5. Estimate of hourly employee compensation (Federal Government).<sup>9</sup>**

Federal Wage Series	Occupation	General Schedule Designation	Annual Salary	Fringe Benefit Rate	Annual Total	Percent of Time	Total COR Cost
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## **15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS**

This is a new information collection.

## **16. PUBLICATION OF RESULTS OF DATA COLLECTION**

The results of the data collection will be analyzed and integrated into the pilot study report. Data collection will be completed within 90 days of the end of the pilot program period and followed by a statistical analysis in 180 days. Both descriptive and analytical methods will be employed during the data analysis. The results of the study will be documented in a technical report that will be delivered to and maintained by FMCSA. No information will be released that will allow one to identify any participating motor carrier. This report will be available to the public on the FMCSA Web site, at [www.fmcsa.dot.gov](http://www.fmcsa.dot.gov). The contents of the technical report will be utilized in developing the report that FMCSA is required to provide to Congress, pursuant to Section 5222 of the FAST Act.

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

FMCSA is not seeking an exemption from displaying the expiration date on the information collection forms.

## **18. EXCEPTIONS TO CERTIFICATION STATEMENT**

None.

## **19. ATTACHMENTS**

- A. FAST Act, Section 5222 (Pub. L. 114-94, 129 Stat. 1312)( 49 U.S.C. 31100 note).
- B. Draft Online Survey.

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<sup>10</sup> <https://www.federalpay.org/jobs/gs>

<sup>11</sup> Office of Personnel Management, "2018 General Schedule (GS) Locality Pay Tables," January 2018. [https://www.opm.gov/policy-data-oversight/pay-leave/salaries\\$215-wages/2018/general-schedule](https://www.opm.gov/policy-data-oversight/pay-leave/salaries$215-wages/2018/general-schedule)

## 20. REFERENCES

U.S. Bureau of Labor Statistics. Occupational Employment Statistics, May 2016 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484100 – General Freight Trucking. 11-3071 Transportation, Storage, and Distribution Managers, <https://www.bls.gov/oes/current/oes113071.htm>, Accessed September 15, 2017.

U.S. Bureau of Labor Statistics. “Table 10. Employer costs per hour worked for employee compensation and costs as a percentage of total compensation: private industry workers, by industry group, June 2017.” <https://www.bls.gov/news.release/ecec.t10.htm>, Accessed September 15, 2017.

U.S. Congress. Fixing America’s Surface Transportation Act. <https://www.congress.gov/114/bills/hr22/BILLS-114hr22enr.pdf>, Accessed September 15, 2017.

January 29, 2019