

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

**SUPPORTING STATEMENT
Licensing Applications for Motor Carrier Operating Authority**

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 (ICR) titled *Licensing Applications for Motor Carrier Operating Authority*, covered by OMB Control Number 2126-0016 which is due to expire on March 31, 2021.

This ICR applies to the following respondents:

- Existing FMCSA registrants¹ that are subject to FMCSA’s licensing, registration, and certification regulations that wish to apply for additional authorities; and
- Mexico-domiciled carriers that wish to operate beyond the U.S. municipalities on the U.S.-Mexico border and their commercial zones.

Existing registrants seeking additional authorities must continue to use the applicable form: OP-1, OP-1(P), OP-1(FF), and/or (NNA). Mexico-domiciled carriers seeking registration authority or additional authorities must use Form OP-1(MX). FMCSA is requesting that information collection approval for the OP-1 form series, including Form OP-1(MX), continue to be effective for the 3-year period covered by this ICR. However, as described further below, first-time applicants seeking an FMCSA-issued registration must apply using a different method and form.

Part A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

FMCSA has the following legislative authorities to require the following motor carrier entities to register:

- 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).

These types of 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.

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

Currently, FMCSA is in the process of developing the “Unified Registration System (URS),” which is a system developed to streamline FMCSA’s registration process. This is a result of the Final Rule titled “Unified Registration System,” (78 FR 52608) dated August 23, 2013, which implemented statutory provisions for an online registration system for entities that are subject to FMCSA’s licensing, registration, and certification regulations (Attachment D). The purpose of the Unified Registration System (URS) is to streamline the registration process into one dynamic online application (MCSA-1) and serve as a clearinghouse and repository of information for entities required to register with FMCSA.

Previous to the development of the URS, in order to register with FMCSA or apply for additional authorities, applicants submitted relevant OP-1 form(s) depending on the type of motor carrier entity seeking operating authority. The OP-1 forms are available to print off FMCSA’s website. Respondents either print and mail the forms or print and upload documents via FMCSA’s website. With the development of the URS, the current goal is for the OP-1 forms to fold into one overarching application: the MCSA-1. Information is collected through URS, and the MCSA-1 is a dynamic application within URS that is meant to be used by all motor carriers seeking authority or seeking to add to their existing authority, with the exception of form OP-1(MX).

In the implementation of the URS, FMCSA began a phased rollout in 2015. The first phase became effective on December 12, 2015. The first phase impacted only first-time applicants seeking an FMCSA-issued registration.

FMCSA had planned subsequent URS rollout phases for existing registrants wishing to add additional authorities, however, there have been substantial delays, and subsequent phases have not been rolled out to date. As a result, 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 (82 FR 5292) (Attachment E).

Pursuant to the delay in the URS system subsequent phases and resulting rule, FMCSA continues to accept only forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) for existing registrants wishing to apply for additional authorities.

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 the MCSA-1. Information collection activities associated with MCSA-1 are covered under a different ICR, titled “FMCSA Registration/Updates,” OMB Control No. 2126-0051.

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

The OP form series consist of the following:

- OP-1 “Application for Motor Property Carrier and Broker Authority” (Attachment F).
- OP-1(P) “Application for Motor Passenger Carrier Authority” (Attachment G).
- OP-1(FF) “Application for Freight Forwarder Authority” (property or household goods) (Attachment H).
- OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to

Operate Beyond U.S. Municipalities and Commercial Zones on the U.S.- Mexico Border” (Attachment J).

- OP-1 (NNA) “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers” (Attachment I).

Information collected through these forms aids FMCSA in determining the type of operation a company will run, the cargo it will carry, and the resulting level of insurance coverage the applicant will be required to obtain and maintain to continue its operating authority. The OP-1 series of forms request information on the applicant’s familiarity with relevant safety requirements, the applicant’s willingness to comply with those requirements during its operations, and the applicant’s willingness to meet any specific statutory and regulatory requirements applicable to its proposed operations.

FMCSA also uses information from these forms to prepare a public notice of the registration application for each applicant, which is then published electronically in the “FMCSA Register at <https://li-public.fmcsa.dot.gov/>. 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.

If no complaints are filed, FMCSA will issue the registration authorizing surface transportation operations (i.e., operating authority) if: (1) the applicant is willing and able to comply with all applicable statutory and regulatory provisions and safety fitness requirements, and (2) the applicant has made the required insurance and process agent filings under statute 49 USC 13902 and 49 CFR Part 365.107. For Form OP-1(MX) applications, such FMCSA publication will occur only after the motor carrier successfully completes the Pre-authorization Safety Audit (PASA) and FMCSA approves the application. Such publication of an application summary as a preliminary grant of authority in the FMCSA Register is not an issuance of registration authority, but notice to the public to permit interested parties wishing to oppose the authority to submit a protest to FMCSA under 49 CFR 365.507(d)

A preliminary grant of authority cannot become effective as an active operating authority for a minimum of 10 days after publication.

3. EXTENT OF AUTOMATED INFORMATION COLLECTION

As noted above, effective December 12, 2015, OP-1 series forms, with the exception of OP-1(MX), can only be used to apply for additional authorities, not for initial registration with FMCSA. These forms request information to identify the applicant, the nature and scope of its proposed operations, a narrative description of the applicant’s safety policies and procedures, and information regarding the drivers and vehicles it plans to use in U.S. operations.

Forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) can be filed online or in paper format. For the purposes of this ICR, FMCSA assumes that all existing registrants using forms OP-1, OP-1(P), OP-1(FF), or OP-1(NNA) will file online. Currently, Form OP-1(MX) can only be filed using the paper format.

4. EFFORTS TO IDENTIFY DUPLICATION

There are no similar filings made with any other Federal Agency or within the Department of Transportation that would result in duplication of this information.

5. EFFORTS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES

The paperwork burdens associated with completing OP-1 series forms are minimal for small businesses, as the forms are easy to understand and complete. However, non-U.S. domiciled applicants are required to provide basic information and additional safety information and certifications of compliance to demonstrate their willingness and ability to comply with applicable safety regulations. The requested information cannot be obtained from any other source, since all Mexico-domiciled applicants will be located outside of the United States, and this ICR requests no more information than is necessary to ensure compliance with applicable safety regulations.

6. IMPACT OF LESS FREQUENT COLLECTION OF INFORMATION

OP-1, OP-1(P), OP-1(FF), and OP-1(NNA): There is no requirement that any of these forms be filed on a periodic basis. The forms are filed on an “as needed” basis. Since the rollout of URS Phase I, the sole purpose of these forms is to allow existing registrants to apply for additional authorities.

OP-1(MX): A new application form is currently required only if a Mexico-domiciled carrier wishes to extend the scope of its authority or is applying for new authority. Under the current registration rules at 49 CFR part 365.509, subpart E, when a Mexico-domiciled carrier wishes to expand its authority, it must make an “initial filing” of the Form OP-1(MX) and go through the full application process to obtain the additional authority. All Mexico-domiciled carriers are required to report changes in basic identifying information, such as addresses and telephone numbers, through supplemental filings as within 45 days or as changes occur. FMCSA does not require Mexico-domiciled registrants to re-file the entire form in these circumstances.

7. SPECIAL CIRCUMSTANCES

No special circumstances apply to this information collection

8. COMPLIANCE WITH 5 CFR 1320.8:

FMCSA published a 60-day notice in the Federal Register requesting public comments on the proposed renewal of this information collection. FMCSA received one comment. The commenter expressed a view point on how quotes are inaccurately reported in the media.

FMCSA found this comment to be unrelated to this ICR.

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. The OP-1 series of forms call for information identifying the applicant and the scope of its proposed operations. All registration applications filed with FMCSA become part of a public docket and are open to the public for inspection and review.

11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

The information requested and collected is not of a sensitive nature.

12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED

ASSUMPTIONS FOR BURDEN ESTIMATES

The estimates provided in Table 1 and Error: Reference source not found are based on the number of OP-1 forms collected by FMCSA during the calendar years 2017, 2018, and 2019.¹ FMCSA uses the average number of total forms received across all three years, to produce the 2021, 2022, and 2023 annual estimates.

The average annual burden is calculated by multiplying the number of respondents by the estimated form completion time. FMCSA estimates Forms OP-1, OP-1(P), and OP-1(FF) take 2 hours to complete. Forms OP-1(MX) and OP-1(NNA) are estimated to take 4 hours to complete. The 2- and 4-hour estimation applies to both new and existing applications.

Table 1 Estimated Annualized Burden Hours for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondent Form OP-1 (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2021	74,958	74,958	2	149,916
2022	74,958	74,958	2	149,916
2023	74,958	74,958	2	149,916
Total	224,874	224,874	2	449,748
Annual (rounded)	74,958	74,958	2	149,916

¹ FMCSA, Licensing & Insurance (L&I) data for calendar years 2017, 2018, and 2019.

Table 2 Estimated Annualized Burden Hours for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondent Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2021	1,418	1,418	2	2,836
2022	1,418	1,418	2	2,836
2023	1,418	1,418	2	2,836
Total	4,254	4,254	2	8,508
<i>Annual (rounded)</i>	<i>1,418</i>	<i>1,418</i>	<i>2</i>	<i>2,836</i>

Table 3 Estimated Annualized Burden Hours for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondent Form OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2021	4,804	4,804	2	9,608
2022	4,804	4,804	2	9,608
2023	4,804	4,804	2	9,608
Total	14,412	14,412	2	28,824
<i>Annual (rounded)</i>	<i>4,804</i>	<i>4,804</i>	<i>2</i>	<i>9,608</i>

Table 4 Estimated Annualized Burden Hours for FORM OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.”

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2021	27	27	4	108
2022	27	27	4	108
2023	27	27	4	108
Total	81	81	124	324
<i>Annual (rounded)</i>	<i>27</i>	<i>27</i>	<i>4</i>	<i>108</i>

Table 5 Estimated Annualized Burden Hours for, FORM OP-1(NNA), “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondent IC-5 Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)
2021	2	2	4	8
2022	2	2	4	8
2023	2	2	4	8
Total	6	6	4	24
<i>Annual (rounded)</i>	2	2	4	8

The below provides the total annual burden summary:

+ **149,916** annual burden for form OP-1;
 + **2,836** annual burden for form OP-1(P);
 + **9,608** annual burden for form OP-1(FF);
 + **108** annual burden for form OP-1(MX);
 + **8** annual burden for form OP-1(NNA);
 =**162,476** total Annual Burden.

The below provides the total annual respondent summary:

+ **74,958** respondents for form OP-1;
 + **1,418** respondents for form OP-1(P);
 + **4,804** respondents for form OP-1(FF);
 + **27** respondents for form OP-1(MX);
 + **2** respondents for form OP-1(NNA);
 =**81,209** total annual respondents.

In conclusion, the total estimated annual burden to respondents is **162, 476** hours and total number of annual respondents is **81,209**.

For this renewal, FMCSA continues to assume the entity’s *Compliance Officer* will be the person responsible for submitting forms OP-1, OP-1(P), OP-(FF), OP-1(NNA) and OP-1(MX). While compliance officers who fill out forms OP-1(NNA) and/or OP-1(MX) may be compliance

officers domiciled in another country, for simplicity FMCSA continues to assume the same wage estimate for all forms.

In 2019, The U.S. Department of Labor reported Compliance Officers, who work in the U.S. Transportation industry receive a median hourly wage of 27.24.²

In addition to the wage and/or salary costs, motor carrier entities must also pay for certain benefits such as health insurance, vacation and sick leave, which make up the compliance officer’s total compensation. As is best practice for labor cost estimation methodology, FMCSA continues to use the total cost of compensation or the “loaded” salary and wage rate for all labor categories included in this information collection.

To develop the loaded wage rate for a Compliance Officer, FMCSA uses the Department of Labor’s *Employer Costs for Employee Compensation for Private Industry Workers by Occupational and Industry Group*, data table released March 2020. FMCSA divides the total cost of compensation for the *Transportation and Moving Material* series, \$30.40, by just the *Wages and Salaries*, of the same series, \$20.29. This gives us an applicable load factor of 1.50 ($\$30.40/\$20.29=1.50$). Multiplying the load factor by the Compliance Officer’s median wage and salary rate of \$27.24 is \$40.86 ($\$27.24 \times 1.50 = \40.86), which is the total cost of compensation for a Compliance Officer’s loaded hourly cost.

While the previous information collection, used the similar methodology to develop a load factor, the previous version used a loaded labor cost of \$51.97. This was done because the previous information collection based the *salary and wages* estimate of the Compliance Officer to be \$33.10, which is the average of a Compliance Officer for **all** industries. This information collection revises the Compliance Officer *salary and wage* to \$27.24, which is the *salary and wages* of a Compliance Officer in the *Transportation* series.

Table 6 through Error: Reference source not found below provide summaries of the annualized burden cost by form.

Table 6 Estimated Annualized Burden Labor Cost for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondents Form OP-1 (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2021	74,958	74,958	2	149,916	\$40.86	\$6,125,568
2022	74,958	74,958	2	149,916	\$40.86	\$6,125,568
2023	74,958	74,958	2	149,916	\$40.86	\$6,125,568
Total	224,874	224,874	6	449,748	-	\$18,376,704
<i>Annual (rounded)</i>	<i>74,958</i>	<i>74,958</i>	<i>2</i>	<i>149,916</i>	<i>\$40.86</i>	<i>\$6,125,568</i>

² Bureau of Labor Statistics (2020). “Occupational Employment and Wages,” May 2019, NAICS43-5011– Cargo and Freight Agents.” Available at <https://www.bls.gov/oes/current/oes435011.htm> (accessed April 28, 2020).

Table 7 Estimated Annualized Burden Labor Cost for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondents Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2021	1,418	1,418	2	2,836	\$40.86	\$115,879
2022	1,418	1,418	2	2,836	\$40.86	\$115,879
2023	1,418	1,418	2	2,836	\$40.86	\$115,879
Total	4,254	4,254	6	8,508	-	\$347,637
<i>Annual (rounded)</i>	<i>1,418</i>	<i>1,418</i>	<i>2</i>	<i>2,836</i>	<i>\$40.86</i>	<i>\$115,879</i>

Table 8. Estimated Annualized Burden Labor Cost for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondent Form OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2021	4,804	4,804	2	9,608	\$40.86	\$392,583
2022	4,804	4,804	2	9,608	\$40.86	\$392,583
2023	4,804	4,804	2	9,608	\$40.86	\$392,583
Total	14,412	14,412	6	28,824	-	\$1,177,749
<i>Annual (rounded)</i>	<i>4,804</i>	<i>4,804</i>	<i>2</i>	<i>9,608</i>	<i>\$40.86</i>	<i>\$392,583</i>

Table 9 Estimated Annualized Burden Labor Cost for FORM OP-1(MX) “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border”

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2021	27	27	4	108	\$40.86	\$4,413
2022	27	27	4	108	\$40.86	\$4,413
2023	27	27	4	108	\$40.86	\$4,413
Total	81	81	12	324	-	\$13,239
<i>Annual (rounded)</i>	<i>27</i>	<i>27</i>	<i>4</i>	<i>108</i>	<i>\$40.86</i>	<i>\$4,413</i>

Table 10 Estimated Annualized Burden Labor Cost for FORM OP-1(NNA), “Application for Registration by Non-North America-Domiciled Motor Carriers”

Year	Number of Respondent Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e)
2021	2	2	4	8	\$40.86	\$327
2022	2	2	4	8	\$40.86	\$327
2023	2	2	4	8	\$40.86	\$327
Total	6	6	12	24	-	\$981
<i>Annual (rounded)</i>	2	2	4	8	\$40.86	\$327

The below provides the total annual burden labor cost summary:

- + **\$6,125,568** for form OP-1;
 - + **\$115,879** for form OP-1(P);
 - + **\$392,583** for form OP-1(FF);
 - + **\$4,413** for form OP-1(MX);
 - + **\$327** for form OP-1(NNA);
- = **\$6,638,770** total annual burden respondent labor cost.

13. ESTIMATE OF TOTAL ANNUAL COSTS TO RESPONDENTS

In addition to labor costs, applicants are required to pay a \$300 filing fee for all forms in the OP-1 series, except for Form OP-1(NNA), if the applicant is a private carrier. To remain consistent with the previous information collection, FMCSA assumes all OP-1(NNA) forms are private carriers and does not include a \$300 fee for form OP-1(NNA). All forms are available to submit electronically, except Form OP-1(MX). As a result, for Form OP-1(MX) an associated international postage cost is included in these non-labor costs. FMCSA conservatively estimates a flat cost of \$12.50 for a filer to submit the form via mail. This includes the cost of a large envelop plus the cost of international postage for 4.8 ounces of mail.³ Table 11 through Table 12 provide summaries of the annualized burden non-labor cost by form.

³ See United States Postal Service Retail Calculator Postage Calculator. Estimate based on letter envelope at 4.8 ounces. For this calculation, FORM OP1-MX is approximately 30 pages. 10 pages weighs approximately 1.6 ounces. Retail calculated available here:<https://postcalc.usps.com/Calculator/ShapeAndSize?country=10287&ccode=MX&omil=False&dmil=False&mdt=7%2F29%2F2020&mdz=19%3A29&m=0&dvi=0&ct7=True> (accessed June 29, 2020).

Table 11 Estimated Non-Labor Annualized Burden Cost for FORM OP-1, “Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondent Form OP-1 (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non-Labor Costs (b × c = d)
2021	74,958	74,958	\$300	\$22,487,400
2022	74,958	74,958	\$300	\$22,487,400
2023	74,958	74,958	\$300	\$22,487,400
Total	224,874	224,874	\$900	\$67,462,200
<i>Annual (rounded)</i>	<i>74,958</i>	<i>74,958</i>	<i>\$300</i>	<i>\$22,487,400</i>

Table 12 Estimated Non-Labor Annualized Burden Cost for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondent Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non- Labor Costs (b × c = d)
2021	1,418	1,418	\$300	\$425,400
2022	1,418	1,418	\$300	\$425,400
2023	1,418	1,418	\$300	\$425,400
Total	4,254	4,254	\$900	\$1,276,200
<i>Annual (rounded)</i>	<i>1,418</i>	<i>1,418</i>	<i>\$300</i>	<i>\$425,400</i>

Table 13 Estimated Non-Labor Annualized Burden Cost for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondent Form OP-1 (FF) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non-Labor Costs (b × c = d)
2021	4,804	4,804	\$300	\$1,441,200
2022	4,804	4,804	\$300	\$1,441,200
2023	4,804	4,804	\$300	\$1,441,200
Total	14,412	14,412	\$900	\$4,323,600
<i>Annual (rounded)</i>	<i>4,804</i>	<i>4,804</i>	<i>\$300</i>	<i>\$1,441,200</i>

Table 14 Estimated Non-Labor Annualized Burden Cost for FORM OP-1(MX), “Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.

Year	Number of Respondent Form OP-1(MX) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Filing Fee (b × c = d)	Total Filing Fee (b × \$12.5=e)	Total Non-Labor Costs (d + e = f)
2021	27	27	\$300	\$8,100	\$338	\$8,438
2022	27	27	\$300	\$8,100	\$338	\$8,438
2023	27	27	\$300	\$8,100	\$338	\$8,438
Total	81	81	\$900	\$24,300	\$1,014	\$25,314
<i>Annual (rounded)</i>	<i>27</i>	<i>27</i>	<i>\$300</i>	<i>\$8,100</i>	<i>\$338</i>	<i>\$8,438</i>

Table 15 Estimated Non-Labor Annualized Burden Cost for (NNA), “Application for Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondent Form OP-1(NNA) (a)	Number of Responses (a × 1 = b)	Filing Fee (c)	Total Non Labor Costs (b × c = d)
2021	2	2	\$0	\$0
2022	2	2	\$0	\$0
2023	2	2	\$0	\$0
Total	6	6	\$0	\$0
<i>Annual (rounded)</i>	<i>2</i>	<i>2</i>	<i>\$0</i>	<i>\$0</i>

The below provides the total annual burden non-labor cost summary:

- + \$22,487,400 for form OP-1;
- + \$425,400 for form OP-1(P);
- + \$1,441,200 for form OP-1(FF);
- + \$8,438 for form OP-1(MX);
- + \$0 for form OP-1(NNA);
- = \$24,362,438 total annual burden non-labor cost.

In conclusion, the total estimated annual non-labor cost is \$24,362,438.

14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

The “OP” forms, except for OP-1(MX), are processed by a *Transportation Specialist* (Grade 9) at FMCSA’s Washington, D.C. headquarters. The OP-1(MX) form is processed by a *Transportation Specialist* (Grade 9) at the Trans-Border Office. The estimated loaded hourly cost for processing forms OP-1, OP-1(P), OP-1(FF), and OP-1(NNA) is estimated to be \$42.00 per hour, comprising wages of \$32.81 per hour⁽⁴⁾ and benefits equal to 28 percent of wages, or a load factor of 1.28.⁽⁵⁾ Using the same methodology, the average labor cost for OP-1(MX) is estimated to be \$40.22⁶ per hour. Processing an OP-1, OP-1(P), or OP-1(FF) form is estimated to take 6.5 hours each. Processing an OP-1(MX) or OP-1(NNA) form is estimated to take 8.5 hours. Table 16 through Table 20 provide summaries of the annualized burden cost by form to the federal government.

Table 16 Estimated Annualized Burden Cost to Federal Government for FORM OP-1,

⁴ Office of Personnel Management. Salary Table 2020-DCB for the Locality Pay for the area of Washington –Baltimore-Arlington, CD-MD-VA-WV-PA, Available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB_h.pdf (Accessed June 28, 2020).

⁵ Load factor for federal workers is consistent with other FMCSA ICRs.

⁶ Office of Personnel Management. Salary Table 2020 DFW for the Locality Pay for the area of Dallas-Fort Worth, TX. Available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DFW_h.pdf (accessed June 28, 2020). Median average for all steps 1-10, grade 9 is equal to the medial labor rate.

“Application for Motor Property Carrier and Broker Authority.”

Year	Number of Respondents Form OP-1 (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2021	74,958	74,958	6.5	487,227	\$42.00	\$20,463,534
2022	74,958	74,958	6.5	487,227	\$42.00	\$20,463,534
2023	74,958	74,958	6.5	487,227	\$42.00	\$20,463,534
Total	224,874	224,874	19.5	1,461,681	-	\$61,390,602
<i>Annual (rounded)</i>	<i>74,958</i>	<i>74,958</i>	<i>6.5</i>	<i>487,227</i>	<i>\$42.00</i>	<i>\$20,463,534</i>

Table 17 Estimated Annualized Burden Cost to Federal Government for FORM OP-1(P), “Application for Motor Passenger Carrier Authority.”

Year	Number of Respondents Form OP-1(P) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2021	1,418	1,418	6.5	9,217	\$42.00	\$387,114
2022	1,418	1,418	6.5	9,217	\$42.00	\$387,114
2023	1,418	1,418	6.5	9,217	\$42.00	\$387,114
Total	4,254	4,254	20	27,651	-	\$1,161,342
<i>Annual (rounded)</i>	<i>1,418</i>	<i>1,418</i>	<i>7</i>	<i>9,217</i>	<i>\$42.00</i>	<i>\$387,114</i>

Table 18 Estimated Annualized Burden Cost to Federal Government for FORM OP-1(FF), “Application for Registration by Freight Forwarder.”

Year	Number of Respondents OP-1(FF) (a)	Number of Responses (a × 1 = b)	Average Burden Hours per Response (c)	Total Burden Hours (b × c = d)	Loaded Hourly Wage (e)	Total Labor Costs (d × e = f)
2021	4,804	4,804	6.5	31,226	\$42.00	\$1,311,492
2022	4,804	4,804	6.5	31,226	\$42.00	\$1,311,492
2023	4,804	4,804	6.5	31,226	\$42.00	\$1,311,492
Total	14,412	14,412	20	93,678	-	\$3,934,476
<i>Annual (rounded)</i>	<i>4,804</i>	<i>4,804</i>	<i>6.5</i>	<i>31,226</i>	<i>\$42.00</i>	<i>\$1,311,492</i>

Table 19 Estimated Annualized Burden Cost to Federal Government for FORM OP-1(MX)

“Application to Register Mexican Carriers for Motor Carrier Authority to Operate Beyond U.S. Municipalities and Commercial Zones on the U.S. – Mexico Border.”

Year	Number of Respondents Form OP-1(MX)	Number of Responses	Average Burden Hours per Response	Total Burden Hours	Loaded Hourly Wage	Total Labor Costs
	(a)	(a × 1 = b)	(c)	(b × c = d)	(e)	(d × e = f)
2021	27	27	8.5	230	\$40.22	\$9,251
2022	27	27	8.5	230	\$40.22	\$9,251
2023	27	27	8.5	230	\$40.22	\$9,251
Total	81	81	25.5	689	-	\$27,753
<i>Annual (rounded)</i>	<i>27</i>	<i>27</i>	<i>8.5</i>	<i>230</i>	<i>\$40.22</i>	<i>\$9,251</i>

Table 20 Estimated Annualized Burden Cost to Federal Government for FORM OP-1(NNA), “Application for U.S. Department of Transportation (USDOT) Registration by Non-North America-Domiciled Motor Carriers.”

Year	Number of Respondents Form OP-1(NNA)	Number of Responses	Average Burden Hours per Response	Total Burden Hours	Loaded Hourly Wage	Total Labor Costs
	(a)	(a × 1 = b)	(c)	(b × c = d)	(e)	(d × e)
2021	2	2	8.5	17	\$42.00	\$714
2022	2	2	8.5	17	\$42.00	\$714
2023	2	2	8.5	17	\$42.00	\$714
Total	6	6	26	51	-	\$2,142
<i>Annual (rounded)</i>	<i>2</i>	<i>2</i>	<i>8.5</i>	<i>17</i>	<i>\$42.00</i>	<i>\$714</i>

The below provides the total annual burden cost summary:

- + **\$20,463,354** for form OP-1;
- + **\$387,114** for form OP-1(P);
- + **\$1,311,492** for form OP-1(FF);
- + **\$9,251** for form OP-1(MX);
- + **\$714** for form OP-1(NNA);
- = **\$22,171,925** total annual burden cost to federal government.

In summary, the estimated annualized labor cost to the federal government: \$22,171,925.

15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

The previously approved version of this ICR estimated the average annual burden to be **147,124** annual burden hours, with 73,538 total annual respondents. For this renewal, the estimated average annual burden is an increase to **162,476** with total average annual 81,209 respondents. The annual burden hourly increase of **15,352** is due to the increase in average annual respondents. This increase is in line with a growing U.S. economy and U.S. population for calendar years 2017, 2018 and 2019, which were used to build the estimates for 2021, 2022, and 2023.

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.

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(a)
- B. 49 U.S.C. § 13903
- C. 49 U.S.C. § 13904
- D. Final Rule titled “Unified Registration System,” 78 FR 52608 (August 23, 2013)
- E. Final Rule titled “Unified Registration System; Suspension of Effectiveness,” 82 FR 5292 (January 17, 2017)
- F. Form OP-1
- G. Form OP-1(P)
- H. Form OP-1(FF)
- I. Form OP-1(MX)
- J. Form OP-1 (NNA)