Supporting Statement for

EPA Information Collection Request Number 2265.04

"SmartWay Transport Partnership"

February 2021

1 Identification of the Information Collection

1(a) Title of the Information Collection

This Information Collection Request (ICR) is entitled "SmartWay Transport Partnership," EPA ICR number 2265.04, OMB Control Number 2060-0663.

1(b) Short Characterization/Abstract

The U.S. Environmental Protection Agency ("EPA") created the SmartWay Transport Partnership ("SmartWay") to help businesses and individuals protect the environment, improve air quality, and maximize the energy efficiency of their transportation and logistics management choices. SmartWay is a voluntary program that focuses on increasing efficiency and lowering emissions generated by goods movement. EPA encourages businesses that transport and move goods to adopt energy-efficient strategies and technologies that reduce fuel use, air pollution, and energy costs.

EPA administers a streamlined reporting process for organizations that join SmartWay and has created incentives for improvement such as the SmartWay Excellence Awards Program. EPA also makes reporting tools and other resources available on the Internet to help SmartWay partners evaluate and track their environmental performance and the value of investing in transportation management year-over-year improvements.

This ICR examines the information collected under SmartWay from organizations active in the transportation sector. Sections 1 through 5 of this supporting statement describe the collections (in terms of the need and utility of the data collected). These sections also outline respondent and Agency activities. In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency as a result of the data collections.

SMARTWAY TRANSPORT PARTNERSHIP AND THE TRANSPORTATION SECTOR

SmartWay consists of the following participant groups:

- *Carrier partners* are businesses that provide freight transport services, and that own and/or operate vehicles used in goods movement and related transportation-based assets. These businesses include freight carriers (large trucking, small business truck owners, railroad, inland marine and air carriers), commercial manufacturing and retail companies, logistics service providers and similar organizations. SmartWay partners commit to improve their fuel efficiency and environmental performance when they join the partnership.
- *Shipper and Logistics partners* consist of manufacturers, retailers, logistics companies, and freight forwarders that hire or contract with transportation providers (e.g., carriers) to move goods. SmartWay shipper and logistics companies agree to annually assess the proportion of goods dispatched with SmartWay carriers. They report their freight transportation activity using a reporting tool similar to that used by carriers and EPA calculates their supply

chain efficiency. Shippers and logistics companies agree to ship an increasing percentage of their goods with SmartWay carriers, and to lower emissions from their facility transportation operations when they join SmartWay.

• *Affiliates* are both private and non-profit organizations and companies, including trade associations, state and local governments, leasing companies, retail truck equipment dealers, and other groups that encourage the transportation sector to integrate cleaner, more efficient strategies into their business operations.

This ICR covers the following reporting activities associated with partner participation in the SmartWay program:

SmartWay Partnership Annual Agreement

An organization joins SmartWay when its submitted reporting tool is reviewed and approved. This reporting tool has an embedded SmartWay Partnership Annual Agreement ("Annual Agreement") that states the general terms under which the partner agrees to participate. It also includes what EPA commits to do in return for the organization's participation.

For example, partners commit to measure and report to EPA on an annual basis the environmental performance of their fleet(s) or business units using the EPA's reporting tool; have their performance results posted on the EPA SmartWay website and in the database and submit supporting documentation for any data used to complete their tools upon request by EPA.

In return, EPA agrees to do the following:

- Promote company participation in the partnership by posting partner names on the EPA SmartWay Website and in related educational, promotional, and media materials. EPA will obtain express written consent from the partner before using the partner's name other than in the context of increasing public awareness of its participation as described here.
- Provide companies with industry-wide performance benchmark data as this data becomes available to EPA.
- Assist partners in achieving emission and fuel usage reduction goals (subject to Federal Government Appropriations).
- Treat individual corporate data as sensitive business information.

Partners must check a box at the bottom of the Annual Agreement indicating that they understand and agree to program participation terms before they can move into the reporting tool to enter their data.

SmartWay Annual Reporting Tool

Upon joining SmartWay, carriers, shippers, and logistics management companies agree to annually measure efficiency and emissions generated by their freight transportation-related activities. To do so, partners collect data on their freight management business, such as transportation mode, fleet size, equipment type, fuel use, number of miles traveled, payload and related factors. They then input this information into the reporting tool and submit it electronically to the EPA. EPA reviews, approves, and uploads the completed reporting tool into its Customer Relationship Management (CRM) partner account database ("Partner database").

EPA's partner reporting tools use the keyed-in freight data to calculate efficiency and emission outputs--carbon dioxide (CO_2), oxides of nitrogen (NO_x), and particulate matter (PM). The-outputs in the reporting tool enable partners to conduct analyses that help them optimize the efficiencies of their transportation management activities. These outputs are in reports, embedded in the tool and can be used to benchmark and continuously improve partner sustainability performance year-over-year.

After initially submitting data in the reporting tool when they first join, partners are asked to annually update their transportation management activities using the reporting tool. These annual updates help partners to track fuel economy improvements and monitor the effectiveness of their actions to improve their freight efficiency and reduce emissions year after year. EPA uses these annual updates to monitor the progress of the SmartWay program.

SmartWay Affiliate Agreement

SmartWay affiliates are organizations that encourage their members or customers to participate in SmartWay. Affiliates also commit to highlight SmartWay within the freight transportation industry. To become an affiliate, the organization must complete and submit an affiliate agreement to the EPA.

In return, EPA agrees to do the following:

- Educate SmartWay partners about the affiliates' involvement;
- Publicize affiliates' participation through SmartWay events, the website, and listing in educational materials. EPA will obtain written consent from an Affiliate before publishing its name in a context beyond increasing public awareness of its participation as described above;
- **o** Provide resources to affiliates to assist them in highlighting SmartWay;
- Allow affiliates to use the SmartWay Transport name in their activities related to promoting the SmartWay Transport Program provided the name is never used to imply EPA endorsement of affiliates, their products or services;
- Provide EPA representatives as requested and as available to speak about SmartWay at affiliate meetings, workshops and conferences;
- Provide technical assistance as needed to help affiliates achieve program goals.

SmartWay Excellence Awards

Partners may be considered for a SmartWay Excellence Award and gain public recognition for their environmental performance. Efficiency and emissions data may be used by partners to demonstrate their progress in reducing fuel use

and air emissions. As part of the award process, a subset of partners (shippers, logistics providers and multimodal carriers) may also provide greater detail on specific actions/strategies they have taken to increase the efficiency of their transportation-related business activities while reducing environmental impacts.

Program Evaluation

Through workshops, webinars, conferences, and other interactive venues, SmartWay provides opportunities for partners, other industry representatives, and consumers to provide input on their experience with SmartWay.

SmartWay Tractor and Trailer Program

EPA-designated SmartWay tractors and trailers are a newer generation of longhaul rigs equipped with clean, fuel-saving features that meet voluntary equipment specifications. EPA-designated SmartWay tractors and new and retrofitted trailers can achieve fuel savings of 10 to 20 percent and lower emissions, as compared to non-SmartWay-designated trucks. SmartWaydesignated tractor and trailer owners need not be registered SmartWay partners.

For-hire carriers, owner-operators, manufacturers and retailers with private fleets that own, lease and/or operate EPA-designated SmartWay tractors or trailers are eligible to label the exterior of their EPA-designated SmartWay tractors or trailers with the SmartWay logo. Both SmartWay partners and other private or for-hire fleets may submit an application to EPA to obtain the digital files of the EPA-designated SmartWay logo for eligible tractors and trailers.

Original Equipment Manufacturers (OEMs) that produce tractors and trailers that meet the EPA-designated SmartWay specifications may complete and submit a SmartWay license agreement in order to access and use the SmartWay designated logo for promotional purposes.

EPA may re-evaluate designation requirements over time to reflect changes in the fleet mix.

2 Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA's Office of Transportation and Air Quality (OTAQ) established SmartWay under directives outlined in Subtitle D of the Energy Policy Act of 2005 which calls on EPA to assess the energy and air quality impacts of activities within the freight industry. These activities include long-duration truck idling, the development and promotion of strategies to reduce idling, fuel consumption, and associated negative air quality effects. SmartWay's objectives also are consistent with the Clean Air Act, the Federal Technology Transfer Act, and other laws that authorize and support research, training, and air pollutant control activities.

SmartWay is a key program in the Agency's strategic approach to achieving cleaner,

leaner goods movement supply chains. SmartWay supports and complements the Agency's commerce and environmental policy goals. SmartWay also supports OTAQ's mission to protect the environment from freight transportation-based activities through the advancement of air pollution control equipment and technologies, clean fuels, and innovative mobility and logistics management strategies.

Information collected through SmartWay assists OTAQ in evaluating the challenges the freight industry is managing as the industry seeks to conserve fuel, reduce idling activity, lower emissions, and improve its overall economic and environmental performance (through the application of technology-based controls, efficient logistics management strategies and related approaches). SmartWay also provides opportunities for EPA and industry to cooperate and collectively execute strategies that can help improve the transportation industry's financial and environmental performance, both in the short term and the long term.

Data gathered through SmartWay contribute to OTAQ's goals to improve transportation efficiencies, reduce transportation-based emissions and protect human health and the environment. SmartWay program data also is critical to monitoring and measuring the success of SmartWay as a public/private partnership, both in terms of collaboration and as a tool for improving supply chain efficiency and contributing to cleaner air.

2(b) Practical Utility/Users of the Data

SmartWay Partnership Reporting Tools

Information collected through the SmartWay program has a broad range of practical and useful applications. The annual reporting tool is needed to secure basic contact information and to ensure an organization's commitment to SmartWay's energy and environmental goals. Data submitted through the reporting tool assist partners in quantitatively assessing the fuel consumed and air pollutant emissions generated by their transportation and freight activities. Outputs from the reporting tools' data reports help organizations establish benchmarks, identify strategies, and set future goals for conserving fuel and reducing emissions.

By allowing carriers to compare their efficiency and environmental performance in the online Carrier Performance Ranking spreadsheet with competing carriers, SmartWay drives continued improvements across industry. Superior performance in various partner categories is also recognized through the SmartWay Excellence Awards.

Completing and submitting an updated annual reporting tool helps partners monitor their progress, determine if their goals are being met, and adjust their goals if necessary. These updates also can provide partners with valuable information on the environmental and economic benefits of applying the options available for modifying their freight transport methods (e.g. purchase idle reduction equipment, modify pickup and delivery schedules, adopt intermodal options, etc.).

OTAQ uses outputs from the SmartWay reporting tools and its partner database to evaluate progress toward its goals for reducing transportation-based emissions. Information uploaded from the SmartWay reporting tools into the partner database also is used to select potential candidates for a SmartWay Excellence Award. The data are considered by EPA as part of its Excellence Awards program in conjunction with other information that a subset of partners (shippers, logistics providers and multimodal carriers) may also provide additional qualitative information to demonstrate the freight industry leadership progress they are making to meet the environmental commitments they made when joining SmartWay.

EPA also uses data from the tools to improve the SmartWay tools over time, making them more user-friendly and responsive to needs and changes in the industry; to generate aggregate partner information charts and graphics used in EPA's "Trends, Indicators and Partner Statistics" website, a resource for industry, government and academia; to generate the performance ranges EPA uses in ranking carrier partners; and, to calculate program forecasts and trend lines, for estimating future year benefits.

SmartWay Affiliate Agreement

The affiliate agreement is used to help EPA encourage those supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, associations, tractor/trailer dealerships) to advocate SmartWay's goals for better freight transportation with their membership. This affiliate agreement is a one-time submittal. Once the association has submitted the affiliate agreement, and EPA approves them into the program as an affiliate, the affiliate does not need to submit another affiliate agreement.

Annual SmartWay Excellence Awards

The SmartWay Excellence awards program provides EPA an important opportunity to publicly recognize the collective efforts of industry and individual organizations to conserve energy, improve air quality and raise awareness about the program. This recognition serves as a meaningful incentive, encouraging continuous improvement among existing partners and affiliates, highlighting their success within industry among peers, raising the bar on sustainability and helping to strengthen and build the partnership.

Program Evaluation

Periodic feedback and evaluation on the effectiveness of the SmartWay program and recognition of SmartWay as a brand from program partners, and other representatives active in the transportation sector will enable EPA to make program changes as may be warranted. This feedback and evaluation also enables EPA to ensure the value, usefulness, and effectiveness of the program.

SmartWay Tractor and Trailer Program

Companies that own or lease tractors or trailers designated under the SmartWay Verification Program report the number of EPA-designated SmartWay tractors and/or trailers in their fleets to SmartWay as they apply to obtain the SmartWay tractor and/or trailer logos. SmartWay uses this information to evaluate progress toward its energy efficiency and air quality goals.

Original Equipment Manufacturers that produce tractors and trailers that meet the EPA SmartWay designated specifications may complete and submit a SmartWay license agreement in order to access and use the SmartWay designated logo for promotional purposes. One way

EPA protects the SmartWay brand is via authorization of the license agreements for manufacturers.

3 Non-duplications, Consultations, and Other Collection Criteria

3(a) Non-duplication

The information collected under this ICR is not collected by any other EPA office or any other federal agency. Therefore, no potential for duplication with other federal collections exists.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the 1995 Paperwork Reduction Act (PRA), any agency developing a non-rule related ICR must solicit public comments for a 60-day period prior to submitting the ICR to OMB. These comments, which are used partly to determine realistic burden estimates for respondents, must be considered when completing the final Supporting Statement that is submitted to OMB.

The announcement of a public comment period for this renewal ICR was made in the <u>Federal Register</u> on July 27, 2020 under Docket ID Number **EPA-HQ-OAR-2007-0482**. One comment was received, stating support for the SmartWay program, and offering no comment on the burden estimates.

3(c) Consultations

For a previous iteration of this ICR (2265.01), EPA consulted with a small number of companies participating in SmartWay. Those companies are listed in Table 3.1.

Table 3.1SmartWay Partners and Contact ListPartner Company Contact

AFN Logistics	Jared Palmer
Contract Freighters, INC	Bruce Stockton
Davis Cartage	Susan Sanderson
Green Mountain Coffee Roasters	Don Ostler
H.O. Wolding	Arne Nystrom
KBD Transportation	Pam Mullin
Nebraska Truck Association	Larry Johnson
New Jersey Motor Truck Association	Gail Toth
Schneider	Dennis Damman

The collection instruments covered by this ICR have not changed substantially since then. EPA works closely with its SmartWay partners and solicits voluntary feedback on these instruments as part of the collections.

In addition, the Agency accessed its partner database and associated documentation to estimate the number of respondents and activities. The Agency's data sources are kept up to date based on partner submittals (e.g., partner annual reporting tool submittals) and equipment logo applications.

3(d) Effects of Less Frequent Collection

SmartWay Partnership Annual Agreement and Reporting Tool

The annual agreement is part of the reporting tool. Less frequent data collection would reduce the value of the data in informing freight transportation industry decisions, decrease program effectiveness and hamper EPA's ability to track emission benefits.

A company submits the annual reporting tool upon joining SmartWay and annually thereafter, for as long as an organization remains a SmartWay partner. First-year system outputs are used by partners as a baseline to establish energy and emission reduction goals in the future.

Submitting annual reporting tool updates are necessary for SmartWay partners to determine the effectiveness of their actions to reduce emissions and energy use year-over-year. Likewise, for EPA, collecting and storing the reporting tool data annually ensures that the Agency is able to establish quantitative information on the Program's progress in reaching SmartWay's goals.

Submitting a reporting tool to EPA less frequently than annually would prevent EPA and its SmartWay partners from tracking and assessing the progress of partners and the program as a whole. It also would make it difficult for partners to modify their strategies to reduce energy use and emissions, as needed, to meet their goals. Annual reporting tool updates are necessary for EPA and its SmartWay partners to effectively work toward their shared energy and environmental goals. It would also require significant changes to the program's reporting tools and structure.

The updated data also are important to EPA when assessing partner performance as part of the SmartWay Excellence Awards program. The Excellence Awards are an important improvement incentive and encourages partners to implement effective strategies that help conserve energy, reduce emissions, and improve air quality. This recognition is given on an annual basis.

SmartWay Affiliate Agreement

The affiliate agreement is used to help EPA allow SmartWay supporters who do not qualify as SmartWay partners (e.g., non-profit organizations, associations and tractor/trailer dealerships) to act as an advocate for SmartWay to their membership. This is a one-time submittal. Once the organization has submitted the affiliate agreement, and EPA approves them into the program as an affiliate, the affiliate will not have to complete another affiliate agreement. Submitting the one-time affiliate agreement is necessary for EPA and its affiliates to effectively work toward their shared energy and environmental goals.

Program Evaluation

Providing sufficient opportunities for SmartWay partners and transportation industry professionals to provide input to EPA on the effectiveness of SmartWay is necessary to monitor and implement program changes, as needed, in a timely manner.

SmartWay Tractor and Trailer Program

Companies in good standing that purchase or lease EPA-designated SmartWay tractors and/or trailers can submit an application to apply the SmartWay logo to the exterior of their EPA-designated SmartWay equipment. Submitting the application is necessary for EPA to protect the SmartWay brand and respondents to effectively work toward their shared energy and environmental goals.

3(e) General Guidelines

Information collections performed under this clearance will comply with general guidelines outlined in 40 CFR 1320.5(d)(2).

3(f) Confidentiality

Participation in SmartWay is voluntary and may be terminated by participants or EPA at any time. Partners voluntarily provide company-specific data to EPA. Such data may contain trade-secret, commercial or financial information. Accordingly, EPA manages SmartWay partner company-specific data and information in accordance with EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA's general policy on the public disclosure of information and procedures for handling confidential business information (CBI) claims.

3(g) Sensitive Questions

No questions of a sensitive nature are asked of SmartWay participants ("respondent(s)").

4 The Respondents and the Information Requested

4(a) Respondents and NAICS Codes

Table 4.1 lists selected North American Industrial Classification System (NAICS) codes and the primary industry sectors associated with those codes. These industry sectors may be affected by SmartWay-related information collections covered under this ICR.

Table 4.1List of NAICS Codes for SmartWay Partners

NAICS Code Industry

421	Wholesale Trade, Durable Goods
422	Wholesale Trade, Nondurable Goods
4211	Motor Vehicle and Motor Vehicle Part and Supplies
42111	Automobile and Other Motor Vehicle Wholesalers
42112	Motor Vehicle Supplies and New Part Wholesalers
423	Wholesale Trade, Nondurable Goods
44-45	Retail Trade
48-49	Transportation and Warehousing
481	Air Transportation
4811	Scheduled Air Transportation
481112	Scheduled Freight Air Transportation
4812	Nonscheduled Air Transportation
48121	Nonscheduled Air Transportation
481212	Nonscheduled Chartered Freight Air Transportation
481219	Other Nonscheduled Air Transportation
482	Rail Transportation
4821	Rail Transportation
48211	Rail Transportation
482111	Line-Haul Railroads
482112	Short-Line Railroads
483	Water Transportation
4831	Deep Sea, Coastal and Great Lakes Water Transportation
48311	Deep Sea, Coastal and Great Lakes Water Transportation
483111	Deep Sea Freight Transportation
483113	Coastal and Great Lakes Freight Transportation
4832	Inland Water Transportation
48321	Inland Water Transportation
483211	Inland Water Freight Transportation
484	Truck Transportation
4841	General Freight Trucking
48411	General Freight Trucking, Local
48412	General Freight Trucking, Long-Distance
484121 484122	General Freight Trucking, Long-Distance, Truckload
484122 4842	General Freight Trucking, Long-Distance, LTL Specialized Freight Trucking
-	
488 4881	Support Activities for Transportation Support Activities for Air Transportation
48811	Airport Operations
488119	Other Airport Operations
48819	Other Support Activities for Air Transportation
4882	Support Activities for Rail Transportation
48821	Support Activities for Rail Transportation
4883	Support Activities for Water Transportation
48831	Port and Harbor Operations
48832	Marine Cargo Handling
48833	Navigational Services to Shipping
48839	Other Support Activities for Water Transportation
4884	Support Activities for Road Transportation
4885	Freight Transportation Arrangement
48851	Freight Transportation Arrangement
4889	Other Support Activities for Transportation
48899	Other Support Activities for Transportation
488991	Packing and Crating
488999	All Other Support Activities for Transportation
4931	Warehousing and Storage Facilities

49311	General Warehousing and Storage Facilities
49312	Refrigerated Warehousing and Storage Facilities
49319	Other Warehousing and Storage Facilities

4(b) Information Requested

The following describes the information that partners submit as part of their participation with SmartWay:

4(b)(i) Data Items

SmartWay Annual Reporting Tool

A respondent company completes a reporting tool for its transportation mode (e.g., carrier, multi-modal, shipper) when it joins SmartWay. The partnership annual agreement is embedded in the reporting tool. Respondents need to thoroughly review, comprehend and agree to the terms in the agreement.

The partnership annual agreement includes the following information:

- The importance of an accurate and true reporting tool submission,
- Terms of the company's commitment,
- Terms of EPA's commitment,
- General terms of the SmartWay partnership, and
- A statement confirming an understanding of the annual agreement.

The SmartWay annual reporting tool is a Microsoft Excel-based spreadsheet that enables SmartWay partners to quantify the environmental performance of their freight transportation-based operations in reports generated by the tool. SmartWay partners download the reporting tool from the SmartWay website (www.epa.gov/smartway) and enter their freight transportation data when they join SmartWay. They submit updated reporting tools annually thereafter. Truck Carrier partner with 20 trucks or fewer can fill out a simpler On-Line Truck Tool. EPA estimates that 500 partners fall into this category. SmartWay provides tailored carrier and shipper reporting tools for different modes of moving goods. Available reporting tools include truck, rail, inland marine (barge), air, multi-modal, and logistics.

For carrier partners the reporting tool requires the following information:

- Contact information, including a responsible primary contact for the company, an alternate contact, an executive contact; street and electronic addresses and phone numbers, and
- Information about the company, including data about its existing transportation equipment, such as the number of trucks employed; gallons of fuel used and miles traveled annually; average payload; clean air equipment deployed and idling activity.

For shipper and logistics partners, the reporting tool requires the following information:

• Contact information, including a responsible primary contact for the company, an alternate contact, an executive contact; street and electronic addresses, and phone numbers, and

• Information about the company's transportation activities, including carriers hired to transport goods; mode/s used to transport goods; and freight facility operations.

Annual SmartWay Excellence Awards

The Annual SmartWay Excellence Awards recognize outstanding achievements by partners in the program. Data from the reporting tools uploaded and summarized in the partner database provide the basis for an award. A subset of partners (shippers, logistics providers and multimodal carriers) also have the option of providing additional qualitative information, as listed below, to be considered for an award.

Additional information that may be provided by a Partner includes:

- Efforts undertaken to educate its staff, customers, stakeholders and the public about its participation in SmartWay, and
- Other activities supporting its participation as a SmartWay partner (e.g., a shipper may offer special assistance or incentives that help and/or encourage carriers to join SmartWay).

Information that may be provided by an affiliate highlights their success within industry peer organizations, raising the bar on sustainability and helping to strengthen and build the partnership.

SmartWay Affiliate Agreement

An organization that wishes to support SmartWay as an affiliate completes the SmartWay affiliate agreement when it joins SmartWay. The affiliate agreement is in Adobe Acrobat format and is submitted electronically, or by fax.

A completed affiliate agreement lists the commitments that both EPA and the joining organization assume by working together through the SmartWay partnership. On average, EPA estimates that 0.82 hours are needed to thoroughly review, comprehend and submit the affiliate agreement. This could include some legal review.

Partner Evaluation

SmartWay may request feedback on the program and the tools it provides, which would be expected to require no more than .25 hours of a respondent's time.

SmartWay Tractor and Trailer Program

Any company, individual, or SmartWay partner that wants to label the exterior of its tractors and/or trailers as "EPA-designated SmartWay Tractor" or "EPAdesignated SmartWay trailer" will complete and submit the SmartWay Equipment Checklist that may be downloaded from the EPA's SmartWay website. Completion and submission of the Equipment Checklist signifies that a company owns or operates the respective tractor and/or trailer that meet the EPA-designated SmartWay specifications. Note: The EPA-designated SmartWay tractor and trailer logos are separate from and different than the SmartWay partner logo and can be applied for by any buyer of EPA-designated SmartWay equipment.

Data that the partner or EPA-designated equipment buyer submits in the SmartWay Equipment Checklist include:

- 0 Name of the truck and/or trailer manufacturer,
- Name of the truck and/or trailer model/brand,
- The model year of the truck and/or trailer,
- Identification of SmartWay-verified technologies on the trucks (e.g., tires, idling control devices) and trailers (e.g., tires, aerodynamic equipment), and
- The number of EPA-designated SmartWay trucks and/or trailers in use by the company fleet owner/operator/lessor.

The company fleet owner/operator/lessor also completes and submits the Mark (i.e., logo) Signature Form. This form is found on page 54 of the SmartWay Graphic Standards & Usage Guide.) Signing and submitting this form to EPA signifies understanding of the agreement to adhere to the SmartWay logo guidelines.

EPA estimates that it takes partners and company fleet owners/operators/lessors approximately 2.75 hours to compile and submit the SmartWay Equipment Checklist and Mark Signature Form.

Any manufacturer that wishes to label the interior of tractors or trailers it produces as "SmartWay Designated" will complete and submit the SmartWay License Agreement that may be downloaded from the EPA's SmartWay website. Completion and submission of the License Agreement authorizes advertising and promotion of tractors or trailers that meet the EPA-designated SmartWay specifications by Original Equipment Manufacturers.

4(b) (ii) Respondent Activities

SmartWay Partnership Annual Agreement and Reporting Tool

To register with SmartWay, respondents are asked to:

- Download the reporting tool,
- Review the embedded partnership annual agreement and agree to its terms,
- Complete the reporting tool, and
- Submit the completed reporting tool to EPA electronically.

SmartWay Annual Reporting Tool

Partners are asked to annually submit an updated reporting tool to the EPA. These activities involve the following:

- Gathering freight transportation data (fuel, miles and payload) needed for the reporting tool,
- Reviewing reporting tool reports and data, and
- Submitting a new or updated reporting tool and reviewing data outputs annually.

SmartWay Affiliate Agreement

To join the SmartWay Partnership as an affiliate, organizations are asked to complete and submit the affiliate agreement. This activity includes the following:

- Download the affiliate agreement
- Review its terms, and
- Submit the signed affiliate agreement to EPA electronically.

Annual SmartWay Excellence Award

In addition to reporting data via the reporting tool, a subset of partners (shippers, logistics providers and multimodal carriers) have the option to submit information on their specific projects/events to reduce fuel use, save energy, and publicly promote their participation in the SmartWay program. When a partner chooses to submit this information, it will:

- Gather and compile information (dates, participants, weight and/or emissions savings data) on its activities, including samples of promotional materials and in-house tools developed to highlight their involvement in SmartWay, and
- Send these materials to EPA, electronically.

Program Evaluation

EPA may seek feedback on the SmartWay program on a random and voluntary basis, and respondents may be asked to respond to a range of questions. These questions could include the usability of the reporting tool and the program's value to their organization, recognition of the SmartWay brand, understanding about the partnership, among others.

SmartWay Tractor and Trailer Program

Any company, individual or SmartWay partner's completion of the SmartWay Tractor and Trailer Program application includes the following steps:

- Review the EPA-designated SmartWay technical specifications to determine whether the tractor and/or trailer is eligible for the designation,
- Review the SmartWay Graphic Standards and Usage Guide that details specifics and guidelines for SmartWay logo use,
- If eligible:
 - Complete and submit the SmartWay Equipment Checklist which can be downloaded from the SmartWay website. Information to be provided includes:
 - Name of the truck and/or trailer manufacturer,
 - Truck and/or trailer model/brand,
 - Truck and/or trailer model year,
 - EPA-verified SmartWay technologies on trucks (tires, idling

control devices),

- Listed technologies and manufacturers are on the SmartWay website.
- SmartWay-verified technologies on trailers (tires, aerodynamic equipment),
 - Listed technologies and manufacturers are on the SmartWay website.
- Number of trucks and/or trailers.
- A SmartWay Equipment Checklist needs to be submitted for additional purchases of new trucks and/or trailers to be branded with the SmartWay-designated logos.
- Manufacturers are requested to submit the SmartWay License Agreement every 3 – 6 years. The following information is requested:
 - o Company (licensee) Name
 - **o** Signatory Name (of licensee)
 - Signatory Title
 - Licensee company address
 - o Signatory phone number
 - o Signatory email address
 - o Date

5 Information Collection: Agency Activities, Collection Methodology, and Information Management

5(a) Agency Activities

EPA SmartWay managers, staff, and Partner Account Managers (PAMs) will perform certain activities associated with information collections described in this ICR. These activities serve to develop, evaluate and support the SmartWay program.

SmartWay Annual Agreement

The Agency will perform the following activities related to the partnership annual agreement:

- Promote company participation by posting partner names on the SmartWay website and in related educational, training, and media materials,
- Provide partners with their freight transportation performance ranking data as it becomes available and summarized by EPA,
- Assist partners in achieving freight performance goals,
- Update and maintain SmartWay website, and
- Monitor the distribution and use of SmartWay logos.

SmartWay Annual Reporting Tool

The Agency will perform the following activities related to SmartWay partner-submitted reporting tools:

- Assign a Partner Account Manager (PAM). A PAM is a technical expert that is responsible for reviewing and approving SmartWay partner tool submissions, offers suggestions to partners on efficiency strategies and improvements and engages non-SmartWay companies with SmartWay.
- Review, approve, and upload to the partner database new and updated partner freight transportation performance data submitted in the reporting tool,
- Send a welcome letter and registration certificate to the new partner,
- Request updates of data, strategies undertaken and substantiation of information annually,
- Review partner activities undertaken to highlight their SmartWay participation,
- Review partner's year-over-year progress in the database, and note any anomalies that would necessitate a call from the PAM to the partner,
- Update and maintain SmartWay Website Performance Carrier Ranking List.

Annual SmartWay Excellence Awards

The Agency will review SmartWay partner data and any additional information/data partners provide to highlight their progress and achievements in leaning and greening their freight operations:

- Review and rank performance data that is submitted,
- Review and assess other partner information submitted for award consideration, and
- Summarize and evaluate partner accomplishments and achievements that warrant excellence recognition.

Annual SmartWay Affiliate Challenge

The Agency will review information affiliates provide that show how engaged they are with the SmartWay program. The information provided by affiliates will demonstrate the variety of innovative ways used to raise awareness about freight supply chain sustainability.

Program Evaluation

The Agency will review data and feedback from its partners, and industry representatives on the program and use it to adjust/change and improve the program.

SmartWay Tractor and Trailer Program

SmartWay will perform the following activities in support of the SmartWay Tractor and Trailer Program:

- Review the tractor and trailer logo requests from companies via checklist submissions,
- Answer questions of companies, individuals and partners, as appropriate, and
- Once approved, send the digital logo files to the EPA-designated SmartWay equipment buyer(s),
- Review and file the SmartWay License Agreement,
- Send the digital files of the SmartWay designated logo to the manufacturer.

5(b) Collection Methodology and Management

EPA will use a telephone system, computers, and applicable software to collect, summarize and analyze information gathered under this ICR. Research may also be undertaken periodically to gage program effectiveness. The reporting tools have embedded quality assurance controls based on EPA's statistical analyses of historical freight transportation data. These controls assist the Agency in managing the data and labor costs effectively.

Additionally, EPA will ensure the accuracy and completeness of collected information by reviewing each submittal. The Agency will upload the reviewed and approved data obtained into the partner database and will aggregate data obtained to monitor the progress of participants. These efforts will help to ensure the proper use and processing of the data being collected to enhance the value of the program's information to EPA and the public.

5(c) Small Entity Flexibility

EPA expects that some independent truck owners, small fleet (20 and under trucks) operators and other small businesses will participate in SmartWay. EPA has designed its information collections to minimize respondent burden while obtaining sufficient and accurate freight transportation information. EPA has tailored its reporting tools to ensure that the burden on all businesses – including small businesses – is minimal. For truck carrier partners with 20 trucks or fewer filling out an annual update, EPA has introduced an On-Line Truck Tool, which takes less time to fill out.

Small entities, along with any respondent, can call the SmartWay Helpline, attend and/or download recorded SmartWay webinars, download instruction guides or use the SmartWay email box to access help and program information. Additionally, SmartWay works with affiliates such as state trucking associations to provide additional education and training.

5(d) Collection Schedule

The Agency collects environmental performance data from SmartWay partners annually via an Excel-based reporting tool. Additional information that is submitted for the purpose of being considered for an award is optional.

6 Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

Exhibit 1 presents the annual respondent burden hours for information collection activities associated with SmartWay.

6(b) Estimating Respondent Costs

Exhibit 1 estimates respondent costs associated with each information collection

activity. Specific cost assumptions are discussed below.

6(b)(i) Estimating Labor Costs

The labor rates used to estimate costs to respondents are consistent with hourly national wage rates published by the U.S. Bureau of Labor Statistics publications on employment and earnings for 2019. EPA estimates a median hourly respondent labor cost. EPA also multiplied hourly wage rates by the standard government overhead factor of 1.6 to calculate overhead costs such as paid leave, health insurance, retirement savings, office space, computers, and other business expenses. This resulted in hourly respondent labor burden of \$111.79 for legal staff, \$94.21 for managerial staff, \$72.13 for technical staff, and \$31.57 for clerical and/or administrative staff. Those rates are all higher than in the previous ICR except the rate for technical staff, which is \$3.25 lower than the rate of \$75.38 used in the previous ICR. This resulted in decreased labor costs for some respondent tasks, as shown in Exhibit 1.

6(b)(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

In general, EPA is not expecting that respondents will need additional computers, software, or other capital investments to participate in the SmartWay Transport Partnership. Respondents should be able to use existing computer equipment and software to compile and submit the annual reporting tool and to submit all other information as part of their SmartWay participation.

Operations and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as the "recurring dollar amount of costs associated with O&M or purchasing service."

This ICR <u>no longer</u> includes O&M postage costs for each submittal to EPA for the collection of optional items such as hard copies of materials submitted with the Smartway Excellence Award Application for consideration of a SmartWay Excellence Award. EPA previously estimated an average cost of \$15.00 per submittal. Now, all submittals are electronically provided for the SmartWay Excellence Awards. These costs no longer affect the respondent burden.

6(c) Estimating Agency Burden and Costs.

The data in Exhibit 2 shows that EPA estimates that each EPA federal burden hour for the information collection activities associated with SmartWay is conducted by an experienced technical staff person. EPA is also including overhead costs associated with employing an experienced technical staff person, such as paid leave, health insurance, retirement savings, office space, telephones, computers, and other business expenses.

EPA assumed that federal staff-level burden hours would be completed by an experienced technical staff person being paid at a GS-13, Step 3 federal government employee salary of \$106,586.00/year.¹ EPA then divided the annual 2013 GS-13, Step 3 salary rate by

¹ January 2016 U.S. Office of Personnel Management, Salary Table 2013-GS, 2013 General Schedule,_ <u>https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DET.pdf</u>.

2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$81.99/burden hour.

EPA also assumed that managerial oversight would be completed by a manager being paid at the GS-14, Step 3 federal government employee salary of \$126,270/year. EPA then divided the annual 2016 GS-14, Step 3 of \$126,270 salary rate by 2080 (the number of hours in a work year) and multiplied this number by the standard government overhead factor of 1.6. This calculation resulted in a federal cost of \$97.13/burden hour.

EPA also uses Senior Environmental Employees (SEEs) to support SmartWay. For the SEE employees, EPA used the average hourly rate for Level IV Technical Staff of \$16.39 multiplied by 1.43 benefits rate for \$23.44/burden hour. Labor rates for SEE employees are based on standard rates applied by Senior Service America, Inc., the administrator of a grant program that makes SEE employees available to the EPA.

These estimates are summarized in Exhibit 2.

6(d) Estimating the Respondent Universe and Total Burden and Costs

In this section, EPA describes its estimates of the number of respondents carrying out the information collections under SmartWay. In developing its estimates, EPA referred to its partner database to identify trends in the number of existing and new respondents. Based on this understanding, EPA has estimated the average number of respondents associated with each of the information collections under the program. These averages and an explanation of how they were derived follows for each collection activity.

Affiliates

Based on information drawn from the SmartWay Partner database, there are currently approximately 4,200 respondents participating in SmartWay. Of those 4,200 respondents, approximately 252 (6%) of them are affiliates.

These affiliates do not complete or submit an annual reporting tool. Affiliates join SmartWay to highlight and support SmartWay's goals through education and communications. They typically do not engage in a significant amount of freight activity. Consequently, it is not necessary for them to complete or submit an annual SmartWay reporting tool. However, they must complete and submit an Affiliate Agreement to participate with SmartWay as an affiliate.

Based on historical program growth, EPA estimates that, on average, 429 respondent organizations will join SmartWay each year either as partners or affiliates. Based on the existing percentage of respondents that are Affiliates (i.e., 6%), EPA projects that 26 respondents will join annually as Affiliates). EPA estimates that it will take, on average. 0.82 hours for each of these Affiliates to complete and submit an Affiliate Agreement. For the 3-year period covered by this ICR, EPA estimates the average number of affiliate respondents will be 271.

SmartWay Partnership Annual Agreement and Reporting Tool

EPA asks all organizations that join SmartWay, with the exception of affiliates, to download the reporting tool, which is available online, and to enter their freight transportation activity data into the reporting tool before submitting it to EPA. After that, partners are asked to provide annual updates using the reporting tool.

Based on historical program growth, EPA estimates that 429 organizations representing shipper, carrier (truck, rail), logistics management, and public and private affiliate groups will join SmartWay annually. Using historical trends, EPA estimates that approximately 94%, or 403, of those organizations will register annually as SmartWay partners. The other 6% – 26 organizations– will join as affiliates.

EPA estimates that these 403 new partners will enter data each year, taking 5.16 hours on average to do so. This work will entail the following:

- Reviewing the terms of the embedded annual agreement which may include legal review for some companies,
- Gathering information needed to provide relevant data into the reporting tool,
- Downloading the reporting tool from the SmartWay website and entering information and relevant data into the reporting tool,
- Reviewing the reporting tool and data outputs for inconsistencies and errors,
- Sending the completed reporting tool to the EPA via email.

SmartWay Annual Reporting Tool Updates

Following the initial submittal of data using the reporting tool, EPA asks that partners annually report their progress in meeting their partnership goals. EPA reviewed the SmartWay program's retention rate among its existing partners and found that about 75% of partners that initially submit a reporting tool go on to maintain their status by annually submitting the reporting tool and annual agreement. Thus, of the 403 new SmartWay partners that submit a reporting tool for the first time each year, approximately 302 of them will submit a reporting tool update in years that follow. Using this level of annual increase, EPA estimates that, for the 3-year period covered by this ICR, the average number of repeat annual reporters will be 4,250.

Although the same basic actions that are involved in initially submitting the reporting tool are used in subsequent reporting years, EPA estimates that gathering, reviewing, and submitting an updated reporting tool will require an average of 2.66 hours. The reduction in this burden hour estimate (as compared to running the reporting tool for the first time) is based on the experience that SmartWay partners have acquired in managing their fleet, energy and environmental performance as well as in increased familiarity with the SmartWay reporting tool. Additionally, existing truck carrier partners with fleets of 20 trucks or fewer can now submit an on-line tool, rather that the downloadable Excel-based tool. Through beta testing, partners found this tool to be easier to fill out. EPA estimates that completing and submitting the on-line tool requires an average of 0.45 hours, and that 500 of the 4,250 partners are eligible to use it.

As a result, EPA estimates that on an average annual basis, 4,250 SmartWay partners will provide an updated reporting tool, taking 2.4 hours to do so.

Annual SmartWay Excellence Awards

As a part of its annual SmartWay Excellence Awards program, EPA annually reviews the data respondents submit to identify and recognize respondents that demonstrate a high level of leadership in improving energy efficiency while lowering emissions. Selected shipper and logistics respondents have the option of providing EPA with other relevant information on actions that may not be captured in their performance data.

When a respondent voluntarily opts to submit this information, it will:

- Gather and compile information on its activities, including samples of education and communication materials and in-house tools developed to highlight its involvement in SmartWay,
- If the supplemental information includes activities and/or projects carried out where weight and/or miles are taken out of their supply chain, respondents submit their methodology, calculations with summarized results and
- Send these materials to EPA, electronically.

Based on EPA's experience in administering the SmartWay Excellence Awards program, it is estimated that 132 partners (about 3.1% of all partners) will provide this additional information for consideration on an annual basis during the three-year time period covered by this ICR. On average, these partners will take 3.25 hours to gather and submit the award materials that they would like EPA to evaluate.

Program Evaluation

Over the three-year period covered by this ICR, EPA expects that it will ask respondents for advice and suggestions on the effectiveness of SmartWay and how to improve the tools and incentives it provides the transportation sector. EPA will request this information no more than once a year from no more than 150 respondents and expects that it will require no more than 15 minutes (.25 hrs.) of time from a respondent.

SmartWay Tractor and Trailer Program

Approximately 170 SmartWay partners reported owning or operating tractors that meet the SmartWay designated specifications. This is an annual average of 14 SmartWay partners applying to participate since the SmartWay Tractor Program began in 2008.

Approximately 54 SmartWay partners reported owning or operating dry van trailers that meet the SmartWay designated specifications. This is an annual average of 5 partners applying to participate since trailers were included in the program in 2009.

Based on historical data, EPA estimates that, on average, 19 interested partners will apply to participate in the SmartWay Tractor and Trailer Program annually over the threeyear period covered by this ICR. EPA estimates that it will take these partners approximately 2.75 hours each to gather the required data and to complete and submit the SmartWay Equipment Checklist and the Mark Signature form needed to participate in the SmartWay Tractor and Trailer program.

Based on current data, EPA estimates that, on average, 16 equipment manufacturers who will update a tractor or trailer license agreement each year. EPA estimates that it will

take at least .50 hours each to complete the agreement and submit it to EPA.

Table 6.1 – Responder	nt Counts			
	Number of Partners Filing Repeat Annual Reports	Number of First Year Partners	Number of Affiliates	Total Respondents
YR 1	3948	403	252	
plus 75% of previous				
year's new	302		19	
YR 2	4250	403	271	
plus 75% of previous				
year's new	302		19	
YR 3	4553	403	291	
Average	4250	403	271	4925

6(e) Bottom Line Burden Hours and Cost Tables

6(e)(i) Respondent Tally

As shown in Table 6.2, EPA estimates the total annual hour and cost burden to respondents to be 12,830 hours and \$861,881 with \$0 in non-labor costs.

Table 6.2										
	Total Estimated	l Annual Re	spondent	Burden an	d Cost Sı	immary				
Information Collections	Number of Responses (Average/Year)	Estimated Burden Hours per Respondent	Total Annual Burden Hours	Total Annual Labor	Total Annual Capital Cost	Total Annual O&M Cost	Total Annual Cost			
Affiliate Agreement	26	.82	21	\$1,771	\$0	\$0	\$1,771			
Initial Reporting Tool and Annual Agreement Submission	403	5.16	2,081	\$143,074	\$0	\$0	\$143,074			
Annual Reporting Tool Updates	4250	2.4	9,976	\$678,290	\$0	\$0	\$678,290			
Excellence Awards & Recognition	132	3.25	429	\$31,069	\$0	\$0	\$31,069			
Evaluation	150	.25	38	\$3,533	\$0	\$0	\$3,533			
Tractor and Trailer Program	19	2.75	52	\$3,595	\$0	\$0	\$3,595			
Tractor/ Trailer License Agreement	16	.50	8	\$550	\$0	\$0	\$550			
TOTAL	4,770		12,830	\$861,881	\$0	\$0	\$861,881			

6(e)(ii) Agency Tally

In Table 6.3, EPA presents a summary of the total estimated annual Agency burden for the SmartWay program.

Respondent Type	Annual Burden Hours	Total Annual Labor Costs	Total Annual Capital Cost	Total Annual O&M Cost	Total Annual Cost		
Agency	4,688	\$170,831	\$0	\$349	\$171,180		

Table 6.3Total Estimated Annual Agency Burden and Cost

6(f) Reasons for Change in Burden

Elimination of the Affiliate Challenge and efficiencies gained through the use of the online reporting tool have created burden reductions of 22 and 1,105 respectively for a total reduction 1,127 hours. These reductions counteract a total burden increase of 733 hours that results from increased participation in the program and burden calculation adjustments. In this renewal ICR there is an anticipated net reduction of 394 hours.

6(g) Burden Statement

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2060-0663). Responses to this collection of information are voluntary (Energy Policy Act of 2005; citation 109-58). An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The annual public reporting and recordkeeping burden for this collection of information is estimated to be approximately 2.6 hours per respondent. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air Docket is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2007-0482 and OMB Control Number 2060-0663 in any correspondence.

Exhibit 1											
Estimated Annual Respondent Burden and Cost											
US EPA SmartWay Program											
<u>co El A olhartina y Frogram</u>	Hours and Costs per Respondent								Tot	al Hours and	d Cost
			110010 0.10								
Information Collection Activity	<u>2019 Legal</u>	<u>2019</u> Manager	<u>2019</u> Technical	<u>2019</u> <u>Clerical</u>	<u>Response</u> Hours/Year	<u>Labor</u> Cost/ Year	<u>Capitol</u> <u>Startup</u> <u>Costs</u>	<u>O&M</u> Costs	Number of Responde nts	<u>Total</u> <u>Hours/</u> Year	<u>Total Cost/</u> <u>Year</u>
Unloaded Wage Rates	\$ 69.86	\$ 58.88	\$ 45.08	\$ 19.73			00313		<u>1113</u>	100	
Loaded Wage Rates	\$ 111.78			\$ 31.75							
Affiliate Agreement	+ 111.1.0	+ • • • • • • •	+ .1.10	+ 01110							
Review Affiliate Agreement	0.25	0.25	0.16	0	0.66	\$63.04	0	\$0.00	26	<u>17</u>	\$1,639
Return Affiliate Agreement to EPA	0	0	0	0.16	0.16	\$5.08	0	\$0.00		4	\$132
Subtotal	0.25	0.25	0.16	0.16		\$68.12	\$0.00	\$0.00		21	\$1,771
New/Initial SmartWay Reporting Tool	<u> </u>				· <u> </u>						
Review Partnership Annual Agreement	0	0.24	0.16	0	0.4	\$34.18	0	\$0.00	403	161	\$13,775
Gather data & info for reporting tool	0	0.5	1.46	0	1.96	\$152.41	0	\$0.00	403	790	\$61,423
Input data into reporting tool	0	0	1	0.94	1.94	\$101.98	0	\$0.00	403	782	\$41,096
Review reporting tool	0	0.2	0.5	0	0.7	\$54.91	0	\$0.00	403	282	\$22,128
Send completed reporting tool to EPA	0	0	0.16	0	0.16	\$11.54	0	\$0.00	403	64	\$4,651
Subtotal	0	0.94	3.28	0.94	5.16	\$355.02	\$0.00	\$0.00	403	2,079	\$143,074
Update/Annual SmartWay Reporting Tool											
Gather Data & Info to Update reporting tool	0	0	1	0	1	\$72.13	0	\$0.00	3,750	3,750	\$270,488
Input data into reporting tool	0	0	0	0.5	0.5	\$15.88	0	\$0.00	3,750	1,875	\$59,531
Review reporting tool	0	0.5	0.5	0	1	\$83.17	0	\$0.00	3,750	3,750	\$311,888
Send reporting tool to EPA	0	0	0	0.16	0.16	\$5.08	0	\$0.00	3,750	600	\$19,050
Subtotal	0	0.5	1.5	0.66	2.66	\$176.26	\$0.00	\$0.00	3,750	9,975	\$660,956
Update/Annual SmartWay Online Tool											
Gather Data & Info to Update reporting tool	<u>0</u>	<u>0</u>	0.25	0	0.25	\$18.03	<u>0</u>	\$0.00	<u>500</u>	125	\$9,016
Input data into reporting tool	<u>0</u>	<u>0</u>	<u>0</u>	0	<u>0</u>	\$0.00	<u>0</u>	\$0.00	<u>500</u>	<u>0</u>	<u>\$0</u>
Review reporting tool	<u>0</u>	<u>0.1</u>	<u>0.1</u>	0	<u>0.2</u>	<u>\$16.63</u>	<u>0</u>	<u>\$0.00</u>	<u>500</u>	<u>100</u>	<u>\$8,317</u>
Send reporting tool to EPA	<u>0</u>	<u>0</u>	<u>0</u>	0	<u>0</u>	<u>\$0.00</u>	<u>0</u>	<u>\$0.00</u>	<u>500</u>	<u>0</u>	<u>\$0</u>
Subtotal	<u>0</u>	<u>0.1</u>	<u>0.35</u>	<u>0</u>	<u>0.45</u>	<u>\$34.67</u>	<u>\$0.00</u>	<u>\$0.00</u>	<u>500</u>	<u>225</u>	<u>\$17,333</u>
SmartWay Excellence Awards											
Gather information for EPA consideration	<u>0</u>	<u>0</u>	<u>2</u>	0	2	<u>\$144.26</u>	<u>0</u>	<u>\$0.00</u>	<u>132</u>	<u>264</u>	<u>\$19,042</u>
Review and Send Information to EPA	<u>0</u>	<u>0.5</u>	<u>0.5</u>	<u>0.25</u>	<u>1.25</u>	<u>\$91.11</u>	<u>0</u>	<u>\$0.00</u>	<u>132</u>	<u>165</u>	<u>\$12,026</u>
Subtotal	<u>0</u>	<u>0.5</u>	<u>2.5</u>	<u>0.25</u>	<u>3.25</u>	<u>\$235.37</u>	\$0.00	<u>\$0.00</u>	<u>132</u>	<u>429</u>	<u>\$31,069</u>
Awareness Assessment											
Complete and submit online assessment	<u>0</u>	<u>0.25</u>	<u>0</u>	<u> </u>		<u>\$23.55</u>	<u>0</u>	<u>\$0.00</u>	<u>150</u>	<u>38</u>	
Subtotal	<u>0</u>	<u>0.25</u>	<u>0</u>	0	<u>0.25</u>	<u>\$23.55</u>	\$0.00	<u>\$0.00</u>	<u>150</u>	<u>38</u>	<u>\$3,533</u>
SmartWay Tractor & Trailer Program											
Buyers complete the Equipment Checklist	<u>0</u>	<u>0.5</u>	<u>1.75</u>	<u>0.5</u>	<u>2.75</u>	<u>\$189.21</u>	<u>0</u>	<u>\$0.00</u>	<u>19</u>	<u>52</u>	<u>\$3,595</u>
OEMs updating License Agreement	<u>0</u>	<u>0.09</u>	<u>0.32</u>	<u>0.09</u>	<u>0.5</u>	<u>\$34.42</u>	<u>0</u>	<u>\$0.00</u>	<u>16</u>	<u>8</u>	
Subtotal	<u>0</u>	<u>0.59</u>	<u>2.07</u>	<u>0.59</u>	<u>3.25</u>	<u>\$223.63</u>	<u>\$0.00</u>	<u>\$0.00</u>	<u>35</u>	<u>60</u>	<u>\$4,146</u>
<u>Totals</u>	<u>0.25</u>	<u>3.13</u>	<u>9.86</u>	<u>2.6</u>	15.84	<u>1116.6029</u>	<u>0</u>	<u>0</u>	<u>4996</u>	12,828	<u>\$861,881.59</u>

Elimited Display Elimited Partnership and Affiliate Agreements Hours and Costs per Respondent Total Hours and Cost Data Data Data Data Data Data Data Dat	Exhibit 2											
US EA martWay Program Initial Program Initia Program Initial Program Initi												
Information Collection Activity Image: Collection Activity												
2020 Manager 2020 Technical 2000 SEE Agency hyper Ver Labor Costs Annual Costs Member Add Odd Sarbp Costs Total Add Manager Total Person Ver Total Ver Total Ver Total Ver Total Ver Total Ver Total Add Costs Annual Add Sarbp Annual Costs Annual Add Manager Member Ver Total Ver Total Ver Total Ver Total Ver Pathership and Affiliate Agreements Send a Later Welcoming Pather to SmartWay Program 0.03 0.00 0.08 0.11 \$ 4.79 0.00 0.00 4.57 50.27 \$2.185 Subtoal 0.00 0.00 0.00 0.00 0.00 0.00 4.57 36.56 \$857 Subtoal 0.00 0.02 1.50 1.75 \$ 5.565 0.00 0.00 4.27 747.25 \$23.761 Morale SartWay Reporting Tools 0.00 0.00 0.00 0.00 0.00 4.27 747.25 \$23.761 Update SmartWay Air Pollutant Tracking System 0.00 0.00 0.00 0.00 5.8 5.737 0.00	, ,		Line and the state	0 t						T -4-1	I I a construction of the	01
Image 2020 Maray 2020 2020 E Agency Yaar Labor Code Capual Code Minuber of Serial Code Minuber of Serial Code Agency Yaar Agency Yaar Agency Code Minuber of Serial Code Minuber of Seria	Information Collection Activity	Hours and Costs per Respondent						A		i otai		Cost
Partnership and Affiliate Agreements Average and a least with a more and a least with a least and a least with a least and				2020 SEE	Hours/			Capitol Startup		Respond.	Agency Hours/	
Review & process submitted Affiliate Agreements Send a Letter Welcoming Partner to SmartWay Program 0.03 0.00 0.08 0.11 \$4.79 0.00 0.00 457 50.27 \$2,189 Send a Letter Welcoming Partner to SmartWay Program 0.00 0.00 0.08 \$1.88 0.00 0.00 457 56.56 \$857 Update EPA/SmartWay Website-Affiliates 0.00 0.02 0.00 0.24 0.00 0.00 457 36.56 \$857 New SmartWay Reporting Tools 0.00 0.25 1.75 \$5.55 0.00 0.00 427 747.25 \$23.764 Update SmartWay Partner database with Reporting Tools 0.00 0.25 1.05 1.72 0.00 0.00 427 747.25 \$23.764 Update SmartWay Part Pollutant Tracking System 0.00 0.00 0.00 0.00 427 90.00 \$26.20 Update SmartWay Parter Act Mgmt D-base with Update SmartWay Parter Act Mgmt D-base with Update SmartWay Parter Act Mgmt D-base with Update Marter Marter Act Mgmt D-base with Update Marter Marter Act Mgmt D-base with Update Marter Marter Act Mgmt D-bas		\$ 97.13	\$ 81.99	\$ 23.44								
Send a Letter Welcoming Partner to SmartWay Program 0 0 0.00 0.08 0.08 5 1.88 0.00 0.00 4.57 36.56 \$\$857 Update EPA/SmartWay Webste-Affiliates 0.00 0.00 0.024 0.27 \$\$8.54 0.00 226.50 457 36.56 \$\$857 Subtotal 0.03 0.00 0.24 0.27 \$\$8.54 0.00 226.50 457 36.56 \$\$857 New SmartWay Reporting Tools 0.00 0.25 1.50 1.75 \$55.65 0.00 0.00 427 747.25 \$23.764 Update SmartWay Pather database with Reporting 0.00 0.02 2.00 2.25 \$67.37 0.00 0.00 427 960.75 \$28.764 Update SmartWay Atr Pollutant Tracking System 0.00 0.08 0.25 0.33 \$1.242 0.00 0.00 363.845 \$3.205 Update SmartWay Partner Act Mgmt D-base with 0.00 0.08 0.25 0.33 \$1.242 0.00 0.00 <td>Partnership and Affiliate Agreements</td> <td></td>	Partnership and Affiliate Agreements											
Program 0.00	Review & process submitted Affiliate Agreements	0.03	0.00	0.08	0.11	\$	4.79	0.00	0.00	457	50.27	\$2,189
Update EPA/SmartWay Website-Affiliates 0.00 0.00 0.02 0.02 0.02 0.00 0.00 226.50 457 36.56 \$\$857 Subtotal 0.03 0.00 0.24 0.27 8.84 0.00 226.50 457 123.39 \$\$3.390 New SmartWay Reporting Tools 0.00 0.25 1.50 1.76 \$\$5.56 0.00 0.00 427 747.25 \$\$23.764 Update SmartWay Website 0.00 0.00 0.00 0.00 0.00 0.00 427 747.25 \$\$23.764 Update SmartWay Website 0.00 0.00 0.00 0.00 0.00 0.00 427 9.00 \$\$23.764 Update SmartWay Air Pollutant Tracking System 0.00 0.00 2.05 \$\$6.737 0.00 0.00 3493 \$\$25.94 \$\$63.845 Review and Evaluate Opdated Excel Reporting Tools 0.00 0.08 0.25 0.33 \$\$12.42 0.00 0.00 363.845 \$\$23.93 \$\$0.00 \$\$0.00 \$\$56		0.00	0.00	0.08	0.08	\$	1.88	0.00	0.50	457	36.56	\$857
Subtotal 0.03 0.00 0.24 0.27 \$ 8.54 0.00 228.50 457 123.39 \$3.902 New SmartWay Reporting Tools Review and Evaluate Reporting Tools Ool Data 0.00 0.25 1.55 55.65 0.00 0.00 427 747.25 \$23.764 Update SmartWay partner database with Reporting Tool Data 0.00 0.00 0.00 0.00 0.00 0.00 427 747.25 \$23.764 Update EPA/SmartWay Website 0.00 0.00 0.00 0.00 0.00 427 0.00 \$50 Subtotal 0.00 0.00 0.00 2.00 2.25 \$67.37 0.00 0.00 427 \$60.75 \$28.768 Update SmartWay Partner Act Mgmt D-hase with Update SmartWay Partner Act Mgmt D-hase with Update Reporting Tools 0.00 0.08 0.15 \$18.28 0.00 0.00 393 \$28.848 \$33.678 Subtotal 0.00 0.08 0.75 \$8.43 0.00 0.00 3993 \$38.86 \$33.678 Subtotal	-											
New SmartWay Reporting Tools 0						*						+
Review and Evaluate Reporting Tools 0.00 0.25 1.50 1.75 \$ 55.65 0.00 0.00 427 747.25 \$ \$23.764 Update SmartWay partner database with Reporting Tool Data 0.00 0.00 0.50 0.50 \$ 11.72 0.00 0.00 427 747.25 \$ \$23.764 Update EPA/SmartWay Website 0.00 0.00 0.00 0.00 0.00 0.00 427 0.00 \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$												
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Update EPA/SmartWay Website 0.00 <t< td=""><td></td><td>0.00</td><td>0.00</td><td>0.50</td><td>0.50</td><td>¢</td><td>11 72</td><td>0.00</td><td>0.00</td><td>427</td><td>213 50</td><td>\$5.004</td></t<>		0.00	0.00	0.50	0.50	¢	11 72	0.00	0.00	427	213 50	\$5.004
Subtotal 0.00 0.25 2.00 2.25 \$ 67.37 0.00 0.00 427 960.75 \$ 528.768 Update SmartWay Air Pollutant Tracking System 0.00 0.08 0.50 0.58 \$ 18.28 0.00 0.00 3493 2025.94 \$ 563.845 Review and Evaluate Updated Excel Reporting Tools 0.00 0.08 0.25 0.33 \$ 12.42 0.00 0.00 3693 638.86 \$ 538.65 Update SmartWay Partner Acct Mgmt D-base with Updated Reporting Tools 0.00 0.08 0.025 0.33 \$ 12.42 0.00 0.00 3993 638.86 \$ 538.65 Subtotal 0.00 0.08 0.05 0.16 \$ 8.43 0.00 0.00 3993 638.86 \$ 538.65 Subtotal 0.00 0.50 0.100 1.50 \$ 64.43 0.00 0.00 132 76.56 \$ 56.437 Review Database for Environmental Data 0.00 0.50 1.50 \$ 93.71 0.00 0.00 132 198.00 \$ 1						*						
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Review and Evaluate On-Line Truck Reporting Tools 0.00 0.08 0.25 0.33 \$ 12.42 0.00 0.00 560.209 Update SmartWay Partner Acct Mgmt D-base with Updated Reporting Tools 0.00 0.08 0.08 0.16 \$ 8.43 0.00 0.00 3993 638.88 \$ \$33,678 Subtoal 0.00 0.16 0.58 0.74 \$ 39.13 0.00 0.00 3993 638.88 \$33,678 Subtoal 0.00 0.16 0.58 0.74 \$ 39.13 0.00 0.00 3993 2954.82 \$97,523 SmartWay Excellence Awards 0.08 0.50 0.00 1.65 \$4.43 0.00 0.00 132 76.56 \$6,437 Review Database for Environmental Data 0.00 0.50 1.50 \$ 93.71 0.00 0.00 132 198.00 \$12.369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 1.50 \$ 37.11 2.00 6.00 122 31.68	opute onlaring yar i olatan nacking oystem											
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Updated Reporting Tools 0.00 0.08 0.08 0.16 \$ 8.43 0.00 0.00 3993 638.88 \$33,678 Subtotal 0.00 0.16 0.58 0.74 \$ 39.13 0.00 0.00 3993 2954.82 \$97,523 SmattWay Excellence Awards 0.08 0.50 0.00 0.58 \$48.77 0.00 0.00 132 76.56 \$66.437 Develop Awards Criteria 0.08 0.50 0.00 1.50 \$ 43.7 0.00 0.00 132 198.00 \$812,369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 0.00 132 198.00 \$12,369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 0.00 132 31.68 \$14.27 Subtotal 0.00 0.25 0.00 0.55 \$17.21 0.00 66.00 132 50.437 Process assessment	· · · · · · · · · · · · · · · · · · ·	0.00	0.08	0.25	0.33	\$	12.42	0.00	0.00	500	165.00	\$6,209
Subtotal 0.00 0.16 0.58 0.74 \$ 39.13 0.00 0.00 3993 2954.82 \$\$97,523 SmartWay Excellence Awards 0.00 0.00 0.56 \$ 39.13 0.00 0.00 3993 2954.82 \$\$97,523 SmartWay Excellence Awards 0.00 0.56 \$ 48.77 0.00 0.00 132 76.56 \$6,437 Review Database for Environmental Data 0.00 0.50 1.00 1.56 \$ 64.43 0.00 0.00 132 198.00 \$8,505 Receive and review other information submitted 0.00 0.56 1.50 \$ 93.71 0.00 0.00 132 198.00 \$12,369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 66.00 132 50.424 \$28.738 Awareness Assessment 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 66.437 <td></td> <td>0.00</td> <td>0.08</td> <td>0.08</td> <td>0.16</td> <td>s</td> <td>8 43</td> <td>0.00</td> <td>0.00</td> <td>3993</td> <td>638 88</td> <td>\$33.678</td>		0.00	0.08	0.08	0.16	s	8 43	0.00	0.00	3993	638 88	\$33.678
SmartWay Excellence Awards Develop Awards Criteria 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 6,437 Review Database for Environmental Data 0.00 0.50 1.00 1.50 \$ 64.43 0.00 0.00 132 198.00 \$ 8,505 Receive and review other information submitted 0.00 1.00 0.50 1.50 \$ 93.71 0.00 0.00 132 198.00 \$ \$ 12,369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 0.50 132 31.68 \$ 1.427 Subtotal 0.08 2.08 1.66 3.82 \$ 217.21 0.00 66.00 132 76.56 \$ 6,437 Awareness Assessment Review assessment, research focus and questions 0.08 0.50 0.00 0.25 \$ 20.50 0.00 132 76.56 \$ 6,437 Process assessment and present results to internal audiences 0.00 0.25 0.00 0.00	1 1 0					-						
Develop Awards Criteria 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 6,437 Review Database for Environmental Data 0.00 0.50 1.00 1.50 \$ 64.43 0.00 0.00 132 198.00 \$ \$ 8,505 Receive and review other information submitted 0.00 1.00 0.50 1.50 \$ 93.71 0.00 0.00 132 198.00 \$ \$ \$ 12,369 Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 0.50 132 31.68 \$ \$ 1.427 Subtotal 0.08 2.08 1.66 3.82 \$ 217.21 0.00 66.00 132 504.24 \$ \$ 28.738 Awareness Assessment 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ \$ 6,437 Process assessment and present results to internal audiences 0.00 0.25 0.00 0.25 \$ 20.50 0.00 132 33.00												
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Notify partners that will receive award 0.00 0.08 0.16 0.24 \$ 10.31 0.00 0.50 132 31.68 \$1,427 Subtotal 0.08 2.08 1.66 3.82 \$ 217.21 0.00 66.00 132 504.24 \$ \$28,738 Awareness Assessment		0.00	0.50	1.00	1.50	\$	64.43	0.00	0.00	132	198.00	\$8,505
Subtotal 0.08 2.08 1.66 3.82 \$ 217.21 0.00 66.00 132 504.24 \$28.738 Awareness Assessment Review assessment, research focus and questions 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 6,437 Process assessment and present results to internal audiences 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 132 76.56 \$ 6,437 Subtotal 0.00 0.25 0.00 0.25 20.50 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.00 0.25 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.00 0.75 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.00 0.05 0.00 0.83 \$ 69.26 0.00 0.00 132 109.56 \$ 9,143	Receive and review other information submitted	0.00	1.00	0.50	1.50	\$	93.71	0.00	0.00	132	198.00	\$12,369
Awareness Assessment 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 6,437 Process assessment and present results to internal audiences 0.00 0.25 0.00 0.25 20.50 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.08 0.75 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 SmartWay Tractor-Trailer 0.00 0.75 0.00 0.83 \$ 69.26 0.00 0.00 22 24.20 \$ 1,855 Send logo graphic files to Partner 0.00 0.50 0.00 0.55 \$ 40.99 0.00 0.00 22 24.20 \$ 1,855 Send logo graphic files to Partner 0.00 0.50 0.00 0.55 \$ 40.99 0.00 0.00 22 11.00 \$ 902 Review and file license agreement 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 16 4.00 \$ 3328	Notify partners that will receive award	0.00	0.08	0.16	0.24	\$	10.31	0.00	0.50	132	31.68	\$1,427
Review assessment, research focus and questions Process assessment and present results to internal audiences 0.08 0.50 0.00 0.58 \$ 48.77 0.00 0.00 132 76.56 \$ 6,437 Process assessment and present results to internal audiences 0.00 0.25 0.00 0.25 20.50 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.08 0.05 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.08 0.75 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 Subtotal 0.08 0.75 0.00 0.83 \$ 69.26 0.00 0.00 132 33.00 \$ 2,706 SmartWay Tractor-Trailer 0.00 0.01 1.10 \$ 84.33 0.00 0.00 22 24.20 \$ 1,855 Send logo graphic files to Partner 0.00 0.25 0.00 0.25 20.50 0.00 0.00 22 11.00 \$ 32	Subtotal	0.08	2.08	1.66	3.82	\$	217.21	0.00	66.00	132	504.24	\$28,738
Process assessment and present results to internal audiences 0.00 0.25 0.00 0.25 20.50 0.00 0.00 132 33.00 \$2,706 Subtotal 0.08 0.75 0.00 0.83 \$69.26 0.00 0.00 132 33.00 \$2,706 Subtotal 0.08 0.75 0.00 0.83 \$69.26 0.00 0.00 132 33.00 \$2,706 SmartWay Tractor-Trailer	Awareness Assessment											
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Subtotal 0.00 0.01 0.00 0.02 0.00 0.00 0.01 0.01 0.01 0.00 0.02 0.00 0.00 1.02 109.56 \$9.143 SmartWay Tractor-Trailer Eview Partner application submission 0.00 1.00 0.10 1.10 \$ 84.33 0.00 0.00 22 24.20 \$1.855 Send logo graphic files to Partner 0.00 0.50 0.00 0.50 \$ 40.99 0.00 0.00 22 11.00 \$902 Review and file license agreement 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 16 4.00 \$328 Send logo digital graphic files to partners 0.00 0.20 0.10 2.10 \$ 152.99 0.00 16 4.00 \$ 328 Subtotal 0.00 2.00 0.10 2.10 \$ 152.99 0.00 54.60 76 35.20 \$ 2,77.21	the second se	0.00	0.25	0.00	0.25	¢	20.50	0.00	0.00	132	33.00	\$2 706
SmartWay Tractor-Trailer Review Partner application submission 0.00 1.00 0.10 1.10 \$ 84.33 0.00 0.00 22 24.20 \$1,855 Send logo graphic files to Partner 0.00 0.50 0.00 0.50 \$ 40.99 0.00 0.00 22 11.00 \$902 Review and file license agreement 0.00 0.25 0.00 0.25 \$ 20.50 0.00 1.6 4.00 \$328 Send logo digital graphic files to partners 0.00 0.25 0.00 0.25 \$ 20.50 0.00 1.6 4.00 \$ 328 Subtotal 0.00 2.00 0.10 2.10 \$ 152.99 0.00 54.60 76 35.20 \$ 2,77.21												
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Send logo graphic files to Partner 0.00 0.50 0.00 0.50 \$ 40.99 0.00 0.00 22 11.00 \$ 902 Review and file license agreement 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 16 4.00 \$ 328 Send logo digital graphic files to partners 0.00 0.25 0.00 0.25 \$ 20.50 0.00 16 4.00 \$ 328 Subtotal 0.00 2.00 0.10 2.10 \$ 152.99 0.00 54.60 76 35.20 \$2,77.21		0.00	1.00	0.10	1.10	\$	84.33	0.00	0.00	22	24.20	\$1,855
Review and file license agreement 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 16 4.00 \$ 328 Send logo digital graphic files to partners 0.00 0.25 0.00 0.25 \$ 20.50 0.00 0.00 16 4.00 \$ 328 Subtotal 0.00 2.00 0.10 2.10 \$ 152.99 0.00 54.60 76 35.20 \$ 2,757.21												
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Subtotal 0.00 2.00 0.10 2.10 \$ 152.99 0.00 54.60 76 35.20 \$2,757.21	•											
		0.00	2.00	0.10	2.10	\$	152.99	0.00	54.60	76	35.20	\$2,757.21
	Totals	0.19	5.24	5	10	\$	555	-	\$ 349	5,217	4,688	