

**DEPARTMENT OF TRANSPORTATION**

**1 Information Collection Supporting Statement**

**OPERATING INSTRUCTIONS AND LABELING FOR PLATFORM  
LIFT SYSTEMS FOR MOTOR VEHICLES  
49 CFR §§ 571.403 and 571.404**

**OMB CONTROL NO. 2127-0621**

**INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) approval of a three-year reinstatement of clearance for the information collection for FMVSS No. 403, "Platform Lift Systems for Motor Vehicles," and FMVSS No. 404, "Platform Lift Installations in Motor Vehicles" (OMB Control Number: 2127-0621).

**Abstract:<sup>1</sup>**

Platform lifts are vehicle-mounted elevators installed in motor vehicles to aid wheelchair users and other persons of limited mobility to enter and exit vehicles. These platform lifts are installed by new vehicle manufacturers or alterers of motor vehicles, as well as modifiers of used motor vehicles. FMVSS No. 403 sets forth safety requirements for platform lifts on new motor vehicles that manufacturers and alterers must meet to prevent injuries and fatalities to passengers and bystanders during the operation of platform lifts. It also requires information about and instructions for the lift be placed in owner's manuals, installation instructions, and labels placed on the lifts. FMVSS No. 404 requires new vehicles equipped with platform lifts to have the manufacturer information inserts in the owner's manuals and lift operating instructions to be affixed to the vehicle near the lift controls. The information is collected when a new design occurs. The printing of inserts and labels occur as part of each manufacturer's annualized production process. The information is used by platform lift installers to ensure lifts are installed correctly and by operators, both public and private, for awareness of operating capacity and maintenance requirements. The burden hours have changed from the estimates in the previous information collection request (ICR) because the hours for distribution of the information and labels has been considered in this collection adding 1,370 hours to the 192 burden hours in the previous ICR. The estimated printing costs have not changed from the previous ICR.

**PART A. JUSTIFICATION**

**1. Circumstances that make the collection of information necessary.**

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<sup>1</sup> The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) the purpose of the collection; and (8) if a revision, a description of the revision and the change in burden.

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

FMVSS No. 403 sets forth safety requirements for platform lifts. Platform lifts are vehicle-mounted elevators installed to aid wheelchair users and other persons of limited mobility to enter and exit vehicles. These lifts are installed by new vehicle manufacturers and alterers of motor vehicles or by modifiers that install lifts for customers who own a vehicle without a lift. FMVSS No. 404 is a related standard that applies to new vehicles on which platform lifts are installed. Platform lifts may be installed on vehicles used by the public, like transit buses and motorcoaches, or on privately operated vehicles like vans and minivans adapted for use by disabled persons.

According to the requirements of these two safety standards, lift manufacturers must produce instructions for installation, operation, and maintenance of platform lifts as well as one or two labels to be placed on or near the lift controls to illustrate and describe lift operation. The owner's manual and labeling must indicate the lift's weight capacity and whether the lift is certified for public use or for private use.

**2. How, by whom, and for what purpose is the information to be used.**

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information is used by:

- Platform lift installers so that the correct type of lift -- either public-use or private-use -- is installed and has the necessary weight capacity, and so that lifts are correctly installed and are equipped with the minimum required lighting;
- Operators of public-use lifts so that they are provided with explanatory labels on lift controls and are aware of the lift operating capacity and maintenance requirements;
- Private-use lift owners so that they are provided with explanatory labels on lift controls and are aware of the lift operating capacity and maintenance requirements.

**3. Extent of automated information collection.**

**Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

As the collected information is in the form of labels that must be affixed to the regulated equipment and instruction sheets to be inserted in vehicle owners' manuals, this information is not compatible with electronic methods.

**4. Describe efforts to identify duplication.**

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.**

FMVSS Nos. 403 and 404 are the only Federal standards that specify platform lift safety features and other aspects of lift safety specified in those standards. There are no other Federal regulations requiring the information covered by this collection. The information is provided only once under the FMVSS and is not required by other regulations; there is no duplication.

**5. Efforts to minimize the burden on small businesses.**

**If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This information collection is expected to impact small businesses because many of the platform lift manufacturers would be considered small businesses. However, this information collection is not expected to be burdensome. FMVSS Nos. 403 and 404 are minimum safety standards, and the information they require is basic lift instructions and labeling to allow for safe use and operation. With the exception of brief, specifically-worded statements in English in the instructions concerning lift certification and compliance (e.g., "DOT Private-use lift"), and specific words in a minimum text size to label lift controls (e.g., "Power On/Off", "Raise", "Lower"), lift manufacturers are afforded a high degree of latitude as to text and illustrations they may choose to fulfill all other instruction and labeling requirements.

**6. Impact of less frequent collection of information.**

**Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This information is collected in the form of instructions and labeling that are provided with or attached to platform lifts and inserted into vehicle owners' manuals. If this information were not provided, there is a risk that lifts would be installed and/or operated in an unsafe manner and/or not maintained properly.

**7. Special Circumstances.**

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a. Requiring respondents to report information to the agency more often than quarterly;
- b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c. Requiring respondents to submit more than an original and two copies of any document;
- d. Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- e. In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- g. That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- h. Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None of these special circumstances apply to the information collected under FMVSS Nos. 403 and 404.

**8. Compliance with 5 CFR 1320.8(d).**

If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to those comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years-- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On February 6, 2020, NHTSA published in the Federal Register an announcement that the agency planned to request reinstatement of the information collection approval for FMVSS Nos. 403 and 404, and sought public comments (85 FR 7008). A 60-day comment period was provided for submission of comments by the public. No comments were received in response to the 60-day notice.

On September 30, 2021 the agency forwarded to the Office of the Federal Register (86 FR 54294) another request for comments in which the agency again asked for public comment on this information collection request, and specified that those comments should be provided directly to OMB within 30 days.

**9. Payment or gifts to respondents.**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift will be provided to any respondent.

**10. Assurance of confidentiality.**

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

The subject information collection is concerned with instructions and labeling for platform lifts and therefore does not involve any information for which assurance of confidentiality is necessary or appropriate. Also, NHTSA is neither collecting nor maintaining confidential information under this collection.

**11. Justification for collection of sensitive information.**

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information-collection activity does not involve any sensitive or personal information of any kind.

**12. Estimate of burden hours for information requested.**

**Provide estimates of the hour burden of the collection of information. The**

statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in item 14.**

NHTSA estimates that there are 10 platform lift manufacturers doing business at a given time, and that those manufacturers will incur a total of 1,562 hours of burden annually. This estimate is comprised of time to make changes to required language and the time to distribute that information by affixing labels or placards, placing inserts into owners' manuals, and providing installation instructions.

Platform lift manufacturers typically have a design cycle of approximately 5 years. Therefore, there are aspects of the information collection that only require the manufacturers to incur burden every 5 years, such as changing the owner's manual inserts and labels. However, other aspects of the information collection, such as printing the inserts and labeling the lifts, require manufacturers to incur burden every year.

NHTSA estimates that every year approximately two lift manufacturers will need to change the language of the insert for the vehicle owners' manuals stating the lift's platform operating volume, maintenance schedule, and operating procedures. NHTSA estimates that it will take manufacturers approximately 24 hours to make those changes. Therefore, NHTSA estimates that changes to the owner's manual inserts will take 48 hours annually (2 manufacturers × 24 hrs. = 48 hours per year).

NHTSA estimates that every year approximately two manufacturers will need to change the installation instructions identifying the types of vehicles on which each lift is designed to be installed. NHTSA estimates that it will take manufacturers approximately 24 hours to make those changes. Therefore, NHTSA estimates that changes to the installation instructions will take 48 hours annually (2 manufacturers × 24 hrs. = 48 hours per year).

NHTSA estimates that every year approximately two manufacturers will need to make changes to labels or placards which identify the operating functions of the lift. NHTSA estimates that it will take manufacturers approximately 24 hours to make those changes. Therefore, NHTSA estimates that changes to the labels or placards for lift functions will take 48 hours annually (2 manufacturers × 24 hrs. = 48 hours per year).

NHTSA estimates that every year approximately two lift manufacturers will need to make changes to labels and placards detailing back-up operating procedures. NHTSA estimates that it will take manufacturers approximately 24 hours to make those changes. Therefore, NHTSA estimates that changes to the language of labels or placards for back-up operating procedures will take 48 hours annually (2 manufacturers × 24 hrs. = 48 hours per year).

In addition to making periodic changes to the wording of the owner’s manual inserts, installation instructions, label or placard for lift operating procedures, and the label or placard for lift back-up operation, lift manufacturers also incur burden associated with distributing that information by affixing labels or placards, placing inserts into owners’ manuals, and providing installation instructions.

NHTSA estimates that there will be 27,398 lifts manufactured in each of the next three years. NHTSA estimates that distributing the required information will take approximately 3 minutes per lift or approximately 1,370 hours for all lifts annually (27,398 lifts × 3 minutes per lift = 82,194 minutes, 82,194 minutes ÷ 60 = 1,370 hours).

	Lift Manufacturers	Hours to Make Change	Annual Hours
Per Year Insert Language:	2	24	48
Per Year Install Instruct.:	2	24	48
Per Year Label Change/Operating:	2	24	48
Per Year Label Change/Back-up:	2	24	48

	Lifts-each year next 3 years	Mins. to Distribute	Total Hours
Distribution	27,398	3	1,370
<b>Estimated Total Burden Hours:</b>			<b>1,562</b>

The labor cost associated with the burden hours is derived by applying appropriate hourly labor rates published by the Bureau of Labor Statistics<sup>2</sup> (BLS) to the hourly burden discussed previously in this notice. There are two categories of labor involved. First, for “Assemblers and Fabricators” (Occupation code 51-2000) with an average wage of \$22.94/hour, the labor rate is \$32.72/hour (based on BLS statistics showing wages for private industry workers are 70.1 percent of total compensation<sup>3</sup>). Multiplying that hourly labor rate by the estimated 1,370 labor hours needed annually to affix and distribute the required informational materials yields an annual labor cost of \$44,832.81. Second, for “Technical Writers” (Occupation code 27-3042) with an average wage of \$33.98/hour, the labor rate is \$48.47/hour. Multiplying that hourly labor rate by the estimated 192 labor hours needed for revisions to labels and printed materials yields an annual labor cost of \$9,306.93.

The total annual labor cost is thus estimated to be \$54,139.74.

<sup>2</sup>Available online at [https://www.bls.gov/oes/current/naics4\\_336100.htm](https://www.bls.gov/oes/current/naics4_336100.htm)

<sup>3</sup> See Table 1 at <https://www.bls.gov/news.release/pdf/ecec.pdf>

	Average Wage	Percent of Total Compensation	Labor Rate	Annual Hours	Annual Labor Cost
Assemblers and Fabricators:	\$22.94	70.1%	\$32.72	1,370	\$44,832.81
Technical Writers:	\$33.98	70.1%	\$48.47	192	\$9,306.93
<b>Estimated Annual Labor Cost for This Information Collection:</b>					<b>\$54,139.74</b>

### **13. Estimate of the total annual costs burden.**

**Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

- **The cost estimates should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major costs factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time-period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The cost of this collection of information comprises printing costs. A breakdown of NHTSA's estimate of printing costs is as follows:

- Owner's manual insert — 27,398 lifts × \$0.04 per page × 1 page = \$1,095.92
- Installation instructions — 27,398 lifts × \$0.04 per page × 1 page = \$1,095.92
- Label/placard for lift operating procedures — 27,398 lifts × \$0.13 per label = \$3,561.74
- Label/placard for lift backup operation — 27,398 lifts × \$0.13 per label = \$3,561.74



Based on this breakdown, NHTSA estimates the total printing cost associated with this information collection is \$9,315.32 annually.

	Lifts-each year in next 3 years	Per Unit	Total Cost
Owner's Manual Insert:	27,398	\$0.04	\$1,095.92
Install Instructions:	27,398	\$0.04	\$1,095.92
Label Change/Operating Procedure:	27,398	\$0.13	\$3,561.74
Label Change/Back-up Operation:	27,398	\$0.13	\$3,561.74
<b>Estimated Annual Printing Cost for This Information Collection:</b>			<b>\$9,315.32</b>

**14. Estimates of costs to the Federal Government.**

**Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses such as equipment, overhead, printing, and support staff, and any other expense that would not have been incurred without this collection of information.**

The Federal Government neither collects nor retains any information as a result of this collection of information. The information is provided in instructions and labeling provided with or affixed to platform lifts manufactured for sale to the public.

**15. Explanation of the program change or adjustments.**

**Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.**

This is a reinstatement resulting in a program change. The program change adds 1,562 burden hours to account for labeling and distribution of the information. The estimated printing costs have not changed from the previous ICR.

**16. Publication of results of data collection.**

**For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.**

As there is no information that is collected or maintained by the Federal Government, results of this collection of information will not be published.

**17. Approval for not displaying the expiration date of OMB approval.**

**If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We request approval not to include the expiration date for OMB approval because the information collection is found in a Federal regulation and displaying the expiration would require an update to the CFR.

**18. Exceptions to the certification statement.**

**Explain each exception to the certification statement "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.**

No exceptions to the certification statement are made.

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