

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

**Supporting Statement A  
Beyond Compliance**

**INTRODUCTION**

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

**Part A. Justification**

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

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

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

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

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

#### 4. Providing a report to Congress

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

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

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

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

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

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

Data will be collected electronically from a sample of motor carriers that have had at least three driver inspections and at least three vehicle inspections in the year 2020. This will ensure the carrier's safety performance is based on sufficient data. Motor carriers will be divided into two groups: (1) those with safety performance records that are superior to industry averages and (2) those with safety performance records that are at or below industry averages. The two groups will be distinguished using data available in MCMIS (i.e., DOT-reportable crash rates, driver OOS rates at roadside inspections, and vehicle OOS rates at roadside inspections). High-performing carriers will be identified as those that perform near the top quartile across all three categories. All carriers will be further stratified into three size-based strata according to the number of power units they own: small (9 or fewer power units), medium (10–99 power units), and large (100 or more power units).

Based on a review of the data available in MCMIS<sup>1</sup>, high-performing carriers are those that meet the criteria listed below:

- Driver OOS rates less than or equal to 5 total inspections with a driver OOS violation per 1,000 total driver inspections.

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

- Vehicle OOS rates less than or equal to 90 total inspections with a vehicle OOS violation per 1,000 total vehicle inspections; and
- Reportable crash rates less than or equal to 10 reportable crashes per 1,000 total power units.

These thresholds are near the top quartile of safety performance for large, medium, and small carriers. Preliminary results show that 24,152 carriers meet these thresholds.

Of the 24,152 carriers that may be considered high-performing based on the criteria, a total of 225 will be sampled randomly across each strata ( $X_1 + X_2 + X_3 = 225$ ). An equal number of carriers that do not meet the criteria to be considered high-performing will also be sampled using the same size-based strata ( $Y_1 + Y_2 + Y_3 = 225$ ). The total number of carriers sampled will be 450 ( $X_1 + X_2 + X_3 + Y_1 + Y_2 + Y_3 = 450$ ). The sampling sizes are summarized below:

- Large High-Performing Carriers ( $X_1 = 75$  carriers, selected at random).
- Medium High-Performing Carriers ( $X_2 = 75$  carriers, selected at random).
- Small High-Performing Carriers ( $X_3 = 75$  carriers, selected at random).
- Large Non High-Performing Carriers ( $Y_1 = 75$  carriers, selected at random).
- Medium Non High-Performing Carriers ( $Y_2 = 75$  carriers, selected at random).
- Small Non High-Performing Carriers ( $Y_3 = 75$  carriers, selected at random).

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

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

Despite that some carriers will not respond to the survey request, the project team believes that we will be able to achieve a 50 percent response rate. This belief is based on the following factors: the observed response rates achieved by other researchers investigating the motor carrier

industry<sup>2,3,4</sup>; the significant outreach effort that the team intends to perform as part of this information collection; and, the opportunity to help shape an FMCSA program that provides incentives to carriers. The 450 randomly selected carriers will be asked to participate in the study, with a goal of 225 responses.

Carriers will initially be contacted via email using the contact information in the MCMIS database. Participants would first be invited to participate in an online webinar that explains the primary evaluation design (i.e., analytic hierarchy process, or AHP, which is described in detail in the paragraphs that follow). The project team believes it would be useful to conduct an information session via webinar, as opposed to solely relying on written instructions, since participants may not know how to proceed through the pairwise comparisons. The webinar gives the project team an opportunity to provide examples and to answer any questions. The webinar would be conducted multiple times and participants would be given the option to select the one that best suits their schedules. In addition to the webinar, an online video will be made available to participants that explains the AHP. Once participants complete the webinar or view the video, they will be given a link to complete the survey online (Attachment B) using the online survey tool SurveyGizmo.

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

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

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

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

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

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

Carrier experiences with these safety program elements are the subject of this information collection. As shown in Table 1, as illustrated by examples, these are:

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

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

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

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

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

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

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

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

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

As a supplement to the data collection, the National Association of Small Trucking Companies (NASTC) and Owner-Operator Independent Drivers Association (OOIDA) will be invited to reach out to their members concurrently with the administration of the survey. The purpose of this supplement is to incorporate recommendations from the 60-day notice which suggested that there could be unique challenges faced by smaller carriers and that outreach to this segment of the industry will help to provide greater context to the results of the primary data collection. This supplement is not a part of the formal data collection considered in this ICR, but rather serves to highlight challenges that may be unique to small carriers.

The NASTC and OOIDA will be invited to reach out to their safest member companies to identify the alternative means of training, monitoring and systematizing and ensuring safe operations that exceed the letter of the law. The NASTC and OOIDA will be asked to identify the safest member companies and inquire about best safety practices for smaller motor carriers. This may include driver training, safety culture, and hiring practices, among others. Additionally, the NASTC and OOIDA would be asked to inquire about what incentives would encourage small carriers to participate in a Beyond Compliance program and potential obstacles would discourage participation.

To assist in ensuring substantive responses, the project team will provide NASTC and OOIDA with the synthesis of the literature reviews and summary of carrier best practices gleaned from previously conducted high-performing, safe carrier interviews. The project team will then compare and contrast the framework of best practices developed from the survey data with the information provided by NASTC and OOIDA to determine if any of the recommended elements of a comprehensive Beyond Compliance program should be adjusted based on the needs of smaller carriers.

Additionally, the project team will encourage NASTC and OOIDA to help ensure their qualified member companies (those identified in the small carrier cohorts described in section 2.1) participate in the survey administered as part of this information collection. The project team will also solicit feedback on what type of Beyond Compliance recognition or incentive would be most attractive to their member carriers.

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

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

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

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

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

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

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

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

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

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

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

FMCSA is requesting a one-time collection of data for the Beyond Compliance study as mandated by the FAST Act. Currently, there is no existing data set that can be used for this project. Not collecting this data would result in the failure of FMCSA to fulfill the congressional mandate to develop a Beyond Compliance program, as specified in Section 5222 of the FAST Act.

## **7. SPECIAL CIRCUMSTANCES**

There are no special circumstances related to this information collection.

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

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

Comments from the American Trucking Association (ATA), the Motor & Equipment Manufacturers Association (MEMA), the National Association of Chemical Distributors (NACD), and the National Association of Small Trucking Companies (NASTC) indicated general support of the information collection and the Beyond Compliance program. The MEMA did not propose any changes to the information collection. However, the ATA recommended that any survey tool designed to isolate the best voluntary safety practices of motor carriers ought to clearly define what standards and measures it uses to qualify a safety technology, tool, or program (STTP) as motor carriers are engaged in a wide range of technological, program, and

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



policy-based interventions. The ATA further recommended that the FMCSA obtain qualitative feedback from industry safety professionals on the selection of STTPs in order to refine the methodological robustness of its selected measures.

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

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

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

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

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

Lytix, Incorporated (Lytix), a transportation technology company, indicated support of the information collection. However, Lytx stated that the proposed information collection should not be limited to motor carriers. Specifically, Lytx identified research studies that have conducted before-and-after analyses of the effectiveness of various transportation safety technologies and indicated that the incorporation of these types of studies into the information collection would improve its quality. Lytx recommended that technology providers also be included in the

information collection. However, as previously described, FMCSA conducted a literature review prior to the development of the methodological approach for the information collection that included peer-reviewed studies on the effectiveness of transportation safety technologies. That initiative has already addressed the concern raised by Lytx.

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

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

No payments or gifts will be made to respondents.

## **10. ASSURANCES OF CONFIDENTIALITY**

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

## **11. JUSTIFICATION FOR THE COLLECTION OF SENSITIVE INFORMATION**

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

## **12. ESTIMATES OF BURDEN HOURS FOR INFORMATION REQUESTED**

Though FMCSA seeks a target of 188 motor carriers to participate in the study, the estimated 50 percent response rate implies that approximately 188 out of 375 carriers that are sampled will actually participate. The burden for a participating carrier is associated with several tasks that are presented in chronological order: (1) read the email invitation; (2) attend the webinar which describes the survey process; (3) open the survey and read the directions; (4) complete the survey; (5) and read the email reminders.

For the burden analysis, we assume that all 375 of the carriers that are sampled will read the email invitation. However, approximately half of them (187 carriers) will not respond. We also assume that those 187 carriers will read the email reminders asking them to complete the survey, but again will not respond. The estimated amount of time to complete each task and the estimated total burden hours for the ICR is presented in Table 2Error: Reference source not found.

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

Year	Form	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Total Annual Burden
1	Email Invitation	450	1	5 minutes	37.5 hours
1	Webinar	225	1	10 minutes	37.5 hours
1	Survey Instructions	225	1	5 minutes	18.75 hours
1	Survey	225	1	40 minutes	150 hours
1	Email reminder #1	450	1	5 minutes	37.5 hours
	Email reminder #2	225	1	5 minutes	18.75 hours
<b>Total*</b>					300 hours
<b>Annualized</b>					300 hours

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

It is assumed that transportation/operational managers, or an equivalent position, will undertake this task. The mean hourly wage of Transportation, Storage, and Distribution Managers for the truck transportation industry (NAICS code 484100), \$50.53, is taken from the BLS May 2020 National Industry-Specific Occupational Employment and Wage Estimates.<sup>(6)</sup>

To arrive at a loaded wage<sup>7</sup>, we first calculated the load factor by dividing the average value of the total cost of compensation for private industry workers of the trade, transportation, and utilities industry by the average cost of hourly wages and salaries as reported by the BLS in its Employer Costs for Employee Compensation for December 2020 (\$30.66 total compensation cost / \$21.72 wage and salary = 1.412).<sup>(8)</sup> Multiplying the mean hourly wage for transportation, storage, and distribution managers in the truck transportation industry by the load factor results in a loaded wage hourly cost of \$71.35 (\$50.53 x 1.412 = \$71.35) as shown in Table 3.

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

Occupation	BLS Occupation Code	NAICS Occupational Designation	Mean Hourly Wage	Load Factor	Hourly Compensation Cost
Transportation, Storage, and Distribution Managers	11-3071	General Freight Trucking	\$50.53	1.412	\$71.35

<sup>6)</sup> Bureau of Labor Statistics. Occupational Employment Statistics, May 2020 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484100 – General Freight Trucking. 11-3071 Transportation, Storage, and Distribution Managers. <https://www.bls.gov/oes/current/oes113071.htm> (accessed May 4, 2021).

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

<sup>8)</sup> Bureau of Labor Statistics. “Table 4. Employer Costs for Employee Compensation for private industry workers by occupational and industry group , December 2020.” <https://www.bls.gov/news.release/ecec.t04.htm> (accessed May 4, 2021).

Occupation	BLS Occupation Code	NAICS Occupational Designation	Mean Hourly Wage	Load Factor	Hourly Compensation Cost
		(484100)			

A motor carrier that completes the survey is expected to incur a one-time survey cost of \$77.30 (\$71.35 hourly compensation cost x [5 minutes per email invitation + 10 minutes per webinar + 5 minutes per survey instructions + 40 minutes per survey + 5 minutes per email reminder #1] = \$77.30). The 225 motor carrier participants are expected to incur a combined total cost of approximately \$17,393 = \$77.30 x 225 motor carriers).

In addition to the carriers that choose to participate, there are additional carriers that choose to not participate but are still solicited. Those carriers will receive and may read the initial email invitation as well as the email reminders. A motor carrier that does not complete the survey is expected to incur a one-time cost of \$17.84 (\$71.35 hourly compensation cost x [5 minutes per email invitation + 5 minutes per email reminder #1 + 5 minutes per email reminder #2] = \$17.84). The 225 motor carriers are expected to incur a combined total cost of approximately \$4,014 (\$17.84 x 225 motor carriers). The total costs for both participating and non-participating carriers are shown in Table 4.

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

Year	Carrier	Loaded Average Hourly Wage Rate	Number of Respondents	Total Burden Hours	Total Labor Cost
1	Participating	\$71.35	225	244 hours	\$17,392
	Non-Participating		225	56 hours	\$4,013
<b>Total</b>			450	300 hours	\$21,405
<b>Annualized</b>			450	300 hours	\$21,405

**Estimated Number of Respondents:** 225 participating carriers and 225 non-participating carriers

**Estimated Total Burden Hours:** 300 hours (65 minutes per participating carrier and 15 minutes per non-participating carrier)

**Estimated Total Annual Burden:** \$21,405

**Estimated Annualized Cost of Burden Hours:** \$21,405

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

The total cost to participants is \$21,405.

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

## 14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

The research design, protocol development, and implementation of the research methods will be completed between July 1, 2021 and January 31, 2023. The total cost for the study/contract is \$225,000. There is no specific cost to the government for government personnel incurred by this study, as all government personnel are working within their normal position duties. It is estimated that the contracting officer’s representative (COR)/project lead will spend an average of 10 percent of their time on this project throughout the period of performance, which is 18 months. Calculations for estimating employee compensation over one year for the COR is shown in Table 5.

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

Federal Wage Series	Occupation	General Schedule Designation	Annual Salary	Fringe Benefit Rate	Annual Total	Percent of Time	Total COR Cost
2123 <sup>10</sup>	Research Division Director	GS15 Step 10	\$168,000	28% <sup>11</sup>	\$215,040	10%	\$21,504

## 15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

This is a new information collection.

## 16. PUBLICATION OF RESULTS OF DATA COLLECTION

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

<sup>9</sup>

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

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

developing the report that FMCSA is required to provide to Congress, pursuant to Section 5222 of the FAST Act.

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

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

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

None.

## **19. ATTACHMENTS**

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

## **20. REFERENCES**

U.S. Bureau of Labor Statistics. Occupational Employment Statistics, May 2020 National Industry-Specific Occupational Employment and Wage Estimates: NAICS 484100 – General Freight Trucking, 11-3071 Transportation, Storage, and Distribution Managers, <https://www.bls.gov/oes/current/oes113071.htm>, Accessed May 4, 2021.

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