National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
Vehicle Information for the General Public
New Car Assessment Program
OMB Control No. 2127-0629

Abstract:[1]

NHTSA seeks the Office of Management and Budget's (OMB) approval to reinstate a previously approved information collection (OMB Control Number: 2127-0629) to obtain vehicle information for the general public in support of the New Car Assessment Program (NCAP). The information collection requests responses from major motor vehicle manufacturers about the crashworthiness, crash avoidance, and other capabilities of their vehicle models. The collection is voluntary and conducted annually. The information is primarily used to provide information to consumers. It is used in the annually published "Purchasing with Safety in Mind: What to look for when buying a vehicle" brochure, other consumer publications, and to address consumer inquiries as well as for internal agency analyses. This reinstatement increases the burden hours by 1,195 hours from when this ICR was last approved (from 800 hours to 1,995 hours).

Part A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal and 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.

NHTSA's mission is to save lives, prevent injuries, and reduce motor vehicle crashes. Consumer information programs, such as the New Car Assessment Program (NCAP), are an important tool for improving vehicle safety through market forces. Pursuant to 49 U.S.C. 32302, the Secretary of Transportation (NHTSA by delegation) is directed to provide to the public the following information about passenger motor vehicles: damage susceptibility; crashworthiness, crash avoidance, and any other areas the Secretary determines will improve safety of passenger motor vehicles; and the degree of difficulty of diagnosis and repair of damage to, or failure of, mechanical and electrical systems.

The information collected includes the following:

- Vehicle make, model, body style, certification type, projected sales volume, availability date, etc.,

[1] 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) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

- Crashworthiness features (i.e., adjustable upper belt anchorages, seat belt pretensioners, load limiters, etc.),
- Crash avoidance features (i.e., lane departure warning, forward collision warning, blind spot detection, crash imminent braking, dynamic brake support systems, lane keeping support systems, etc.),
- Crash avoidance test data,
- Automatic crash notification systems,
- Event data recorders,
- Automatic door locks (ADL),
- Anti-theft devices,
- Static Stability Factor (SSF) rating information,
- Vehicle setup information,
- Lower Anchors and Tethers for Children (LATCH) restraint system, and
- Side air bag information that would include whether the side air bags meet the requirements from the Technical Working Group on Out-of-Position (OOP) occupants.

2. 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 primarily used to provide information to consumers. It is used in the annually published "Purchasing with Safety in Mind: What to look for when buying a vehicle" brochure, other consumer publications, and to address consumer inquiries as well as for internal agency analyses. This information collection obtains vehicle and safety feature information from vehicle manufacturers and provides consumers with vehicle safety information such as frontal and side crash test results, crash avoidance performance test results, rollover propensity, and the availability of a wide array of safety features equipped in new model year vehicles. Most importantly, the NCAP provides consumers with comparative information about the safety of new vehicles to assist consumers with vehicle purchasing decisions. Furthermore, the agency has been using this vehicle and safety feature information when responding to consumer inquiries, analyzing rulemaking petitions, and providing technical assistance to Congress.

3. 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.

This information is collected by the agency's NCAP program via electronic files sent to vehicle manufacturers for response. New model year vehicle information data formatted and gathered in Excel spreadsheets by the vehicle manufacturers is transmitted electronically to NHTSA.

4. 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.

NHTSA is the only Federal agency responsible for ensuring motor vehicle safety and providing consumers with vehicle safety rating information. NHTSA has not been able to identify any existing information that can be used to satisfy the need for vehicle information for the general public. While NHTSA has a similar information collection that is conducted by NHTSA's Office of Vehicle Safety Compliance (OVSC), NHTSA has determined that both collections are necessary to meet the agency's needs. The OVSC information collection obtains data related to motor vehicle compliance with the Agency's Federal motor vehicle safety standards, which is provided by the same respondents and includes some of the same data elements. The NCAP information is different from, and supplements, the OVSC data, and is necessary to provide consumers with vehicle safety rating information. Originally, the information for OVSC purposes and the consumer information collection data (requested by NCAP) were conducted together. However, as NHTSA's consumer information program developed, it became necessary to separate the requests. Not only are many of the data elements for the consumer information collection distinct and unique from the compliance data, but many of the elements that are similar or are the same are merely intended to identify vehicles for which the manufacturers are providing information (e.g., make, model, model, year). To reduce duplication, the consumer information collection is closely coordinated with the collection from the OVSC to enable responders to assemble the data more efficiently. The burden is further reduced by sending electronic files to the respondents so that they can enter the data and return it to the Agency electronically.

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

Since NCAP is a voluntary, consumer information vehicle safety program, the vehicle manufacturers decide which make models would be included in their annual submission of new vehicle information to NHTSA. Thus, certain ultra, high-end luxury models such as the Lamborghini, Maserati, Aston Martin (to name a few) are typically not part of the information submission. Therefore, NHTSA anticipates that the annual collection process has minimal impact on small businesses and entities.

6. 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.

The information is collected every year for the "Purchasing with Safety in Mind: What to look for when buying a vehicle" brochure, other consumer publications, and to address consumer inquiries as well as for internal agency analyses. Information is also available on the agency's website, www.nhtsa.gov. If this information is not collected annually, NHTSA would not be able to provide consumers with high-quality up-to-date information about new vehicle safety information that consumers need to make informed vehicle purchases.

7. 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 secrets, 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.

There are no special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2).

8. If applicable, provide a copy and identify the date 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 the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views.

As part of the periodic process of renewing a previously approved collection of information, on July 7, 2020, NHTSA published in the Federal Register an announcement (85 FR 40733) that the agency planned to request approval of reinstatement of the information collection for the NCAP program, and sought public comments on the proposed reinstatement. A 60-day comment period was provided for submission of public comments on the proposed reinstatement of this information collection. *[Note: in the previous renewal of this information collection, NHTSA received no public response. In this reinstatement, NHTSA received one public comment stating general support of the collection request.]*

On November 12, 2021 (86 FR 62876), the agency forwarded to the Office of the Federal Register another request for comments in which the agency again asked for public comment on the proposed reinstatement, and specified that those comments should be provided directly to OMB within 30 days.

The annual information collection process involves constant communications between NHTSA and the individual vehicle manufacturers. This ensures that the information is not only accurate to fulfill NHTSA's need to collect high-quality data for consumer information on the agency's

website, but it also allows NHTSA to receive feedback directly from manufacturers about the information collection itself. For example, based on several manufacturers' submissions of data and their input on how the information provided to NHTSA should indicate performance differences in various types of sensor that are equipped in the advanced driver assistance systems (ADAS), the agency recently changed its questionnaire to ensure that the data provided reflect those differences.

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

NHTSA will not provide any payment or gift to respondents in connection with this information collection.

10. 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.

NHTSA and vehicle manufacturers consider reporting of the vehicle projected sales volume and availability dates as confidential information due to the competitive nature of the information. Crash avoidance test data and side air bag out-of-position test data are also considered private. If a vehicle manufacturer reports information that they deem to be confidential, they may follow NHTSA's procedures at 49 CFR Part 512, Confidential Business Information to request confidential treatment of that information.

11. 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 does not collect any information of a sensitive nature that would be considered private.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

There are approximately 21 vehicle manufacturers that sell passenger cars and light truck vehicles (including sport utility vehicles, pickup trucks, and vans) in the United States with a Gross Vehicle Weight Rating of 10,000 pounds or less, that NHTSA requests annually to respond to this information request. NHTSA estimates that these 21 vehicle manufacturers produce an aggregate of approximately 400 vehicle models each year, for an average of 19 models per manufacturer.

NHTSA estimates the burden associated with this collection based on an expected 5 hours to prepare a response for each vehicle model. Therefore, NHTSA estimates the annual burden to be

95 hours per manufacturer (19 vehicle models × 5 hours) and estimates that the total burden will be approximately 1,995 hours per year (95 hours per manufacturer × 21 manufacturers). Table 1 provides a summary of the estimated burden hours.

Table 1: Burden Hour Estimates

Number of Respondents	Annual Responses per Manufacturer	Estimated Burden Per Response	Total Burden Hours
21	1	95 hours	1,995 hours

To calculate the labor cost associated with submitting the vehicle questionnaires, NHTSA looked at wage estimates for the type of personnel involved with compiling and submitting the documents. NHTSA estimates that the five hours for each vehicle model will involve 2.5 hours of data entry (50% of the total), 2 hours for technical information validation (40% of the total), and 0.5 hour for technical content approval (10% of the total). Therefore, NHTSA estimates that each submission will require 47.5 data entry hours, 38 technical information validation hours, and 9.5 technical content approval hours, for an annual total of 997.5 data entry hours, 798 technical information validation hours, and 199.5 technical content approval hours.

NHTSA estimates the total labor costs associated with the data entry burden hours by looking at estimates from the Bureau of Labor Statistics (BLS) for the average hourly wage for Business Operations Specialists (BLS Occupation code 13-1000) in the Motor Vehicle Manufacturing Industry. BLS estimates the average hourly wage is $39.46.[2] The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.4% of total labor compensation costs.[3] Therefore, NHTSA estimates the hourly labor costs to be $56.05 for data entry.

NHTSA estimates the total labor costs associated with the technical information validation burden hours by looking at estimates from the Bureau of Labor Statistics (BLS) for the average hourly wage for Operations Specialties Managers (BLS Occupation code 11-3000) in the Motor Vehicle Manufacturing Industry. BLS estimates the average hourly wage is $61.62.[4] The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.4% of total labor compensation costs.[5] Therefore, NHTSA estimates the hourly labor costs to be $87.53 for technical information validation.

NHTSA estimates the total labor costs associated with the technical content approval burden hours by looking at estimates from the Bureau of Labor Statistics (BLS) for the average hourly wage for Advertising, Marketing, Promotions, Public Relations, and Sales Managers (BLS

[2] *See* May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, available at https://www.bls.gov/oes/current/naics4_336100.htm#15-0000 (accessed May 4, 2020).
[3] *See* Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed August 2, 2021).
[4] *See* May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, available at https://www.bls.gov/oes/current/naics4_336100.htm#15-0000 (accessed May 4, 2020).
[5] *See* Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed August 2, 2021).

Occupation code 11-2000) in the Motor Vehicle Manufacturing Industry. BLS estimates the average hourly wage is $66.33.[6] The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.4% of total labor compensation costs.[7] Therefore, NHTSA estimates the hourly labor costs to be $94.22 for technical content approval.

Table 2 provides a summary of the labor costs associated with the burden hours.

Table 2: Labor Costs Associated with Burden Hours

Job Function	Average Hourly Labor Cost	Total Burden Hours	Total Labor Cost
Data Entry	$56.05	997.5 hours	$55,909.88
Technical Information Validation	$87.53	798 hours	$69,848.94
Technical Content Approval	$94.22	199.5 hours	$18,796.89
Estimated Annual Labor Cost Associated with Burden Hours			$144,555.71 **($144,556)**

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

There are no costs associated with this collection other than the labor costs associated with the burden hours.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, 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.

NHTSA estimates that the only cost to the Federal government for this information collection is labor cost. Each year, NHTSA allots several weeks of agency staff under the NCAP program to activities related to the collection and use of the new model year vehicle information. Below are cost estimates by the Federal Government because of this request for information. Estimates are based on NHTSA staff and off-site contractors working full time (8 hours per day) for 4 to 6 weeks (5 days per week) to prepare the request, collect and consolidate the information.

The labor cost (by position title) associated with this collection of information is derived by (1) applying the estimated hourly labor rate of NHTSA personnel (NHTSA Federal employees and

[6] *See* May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, available at https://www.bls.gov/oes/current/naics4_336100.htm#15-0000 (accessed May 4, 2020).
[7] *See* Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed August 2, 2021).

NHTSA Contracting employees), (2) dividing by 0.619[8] to obtain the total compensation cost for government workers or 0.704[9] to obtain the total compensation rate for private industry workers, and (3) multiplying by the estimated labor hours for each staff.

NHTSA estimates that the time required for tasks associated with this collection of information and performed by a NHTSA senior program analyst is 6 weeks. The employee expects to work 40 hours each week for 6 weeks. BLS estimates that wage and salary are at 61.9 percent of the total compensation. Thus, the labor cost associated with the information collection for this program analyst is $24,240.

NHTSA estimates that the time required for a NHTSA off-site contracting program analyst to perform tasks for the crashworthiness NCAP program is 5 weeks. The contracting analyst expects to work 40 hours each week for 5 weeks. BLS estimates that wage and salary for this analyst are at 70.4 percent of the total compensation. Therefore, the labor cost associated with the information collection for this contracting analyst is $28,224.

NHTSA estimates that the time required for a NHTSA on-site contracting program analyst to perform tasks for the crashworthiness NCAP program is 4 weeks. The contracting analyst expects to work 40 hours each week for 4 weeks. BLS estimates that wage and salary for this analyst are also at 70.4 percent of the total compensation. Therefore, the labor cost associated with the information collection for this contracting analyst is $18,463.

NHTSA estimates that the time required for the Division Chief to review and approve the ratings letters resulting from this collection of information is 3 days. The employee expects to work 8 hours each day. BLS estimates that wage and salary are at 61.9 percent of the total compensation. Thus, the labor cost associated with the information collection for the Division Chief is $3,184.

Total annual cost to the Government associated with this collection of information is $74,111 ($24,240+ $28,224 + $18,463 + $3,184). Table 3 provides annualized costs to the Federal Government by position title.

Table 3: Federal Government Annualized Costs

	Actual Wage	Percent of Total Compensation	Total Compensation Rate	Labor Hours	Annual Labor Cost
NHTSA Senior Program Analyst	$62.52	61.9%	$101.00	240	$24,240
Off-site Contracting Program Analyst	$99.35	70.4%	$141.73	200	$28,224
On-site Contracting Program Analyst	$81.24	70.4%	$115.89	160	$18,463
Division Chief	$82.12	61.9%	$119.53	24	$3,184

[8] See Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2021), available at https://www.bls.gov/news.release/ecec.t01.htm (accessed August 2, 2021).
[9] See Table 1 at https://www.bls.gov/news.release/pdf/ecec.pdf. (September 2019). Accessed on January 24, 2020.

Estimated Annual Labor Cost to the Government for This Information Collection:	**$74,111**

15. 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 that increases burden to 1,995 hours and $0. This is an increase of 1,195 hours from when this ICR was last approved (from 800 hours to 1,995 hours). The cost analysis was revised to increase the average number of annual burden hours to complete the data submission since there are now 4 advanced crash avoidance technologies in the NCAP program.

16. 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.

NHTSA will use this information collection to disseminate vehicle safety information on the agency's website (**www.nhtsa.gov**), in the "Purchasing with Safety in Mind: What to look for when buying a new vehicle" brochure and other consumer publications.

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

NHTSA is not seeking such approval.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9. [10]

Paperwork Reduction Act Statement: A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-0629. This information is being collected to assist the agency in selecting vehicles to be tested annually under the New Car

[10] Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3): the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority);the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that 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.

Assessment Program and to disseminate vehicle safety information to the American public on the agency website and in NHTSA's published brochure. Responding to this collection is voluntary. For information that is considered confidential, please identify and request the information to be treated with confidentiality. The agency estimates that participation in this information collection will involve 95 hours for each manufacturer per year.
Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.

No exceptions to the certification statement are made.

ATTACHMENTS

1. July 7, 2020 FEDERAL REGISTER notice (60-day notice) [85 FR 40733]
2. November 12, 2021 FEDERAL REGISTER notice (30-day notice) [86 FR 62876]