

**Information Collection Request Supporting Statements: Part A**  
**Consolidated Labeling Requirements for 49 CFR 565 and 567**  
**OMB Control No. 2127-0510**

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

This information collection request (ICR) is to request approval from OMB for reinstatement with modification of the previously approved information collection titled “Consolidated Labeling Requirements for 49 CFR 565 and 567.” Responding to this collection is mandatory and required by 49 CFR Part 565 and Part 567 for manufacturers of motor vehicles. This ICR covers five information collections. There are four information collections under part 565 and one under part 567. The first information collection in part 565 is the requirement for manufacturers to affix vehicle identification numbers (VINs) to all motor vehicles they produce that conform to specific requirements in part 565. The second information collection in part 565 is the requirement to obtain a manufacturer identifier (or identifiers) to be used to uniquely identify the manufacturer within the VIN of each motor vehicle. The third information collection in part 565 is a requirement for foreign manufacturers to submit to the National Highway Traffic Safety Administration (NHTSA) their manufacturer identifiers (this requirement does not apply to U.S. manufacturers because NHTSA issues manufacturer identifiers to these manufacturers). The fourth information collection in part 565 is a requirement to submit VIN-deciphering information to NHTSA. There is one information collection under part 567, which requires manufacturers to affix to each vehicle they manufacture permanent labels certifying the compliance of the motor vehicle.

The VIN assignment and certification labeling information collections are mandatory, as-needed disclosure requirements and the submission of VIN-deciphering information is a mandatory reporting requirement when a manufacturer creates a new VIN-deciphering scheme (including whenever a manufacturer needs to update or otherwise made amendment to a previously-submitted VIN-deciphering scheme). The information collection for the submission of information necessary to obtain a manufacturer identifier and the requirement to submit manufacturer identifiers to NHTSA (for foreign manufactures) is required on occasion, before a manufacturer starts producing motor vehicles, when a manufacturer starts producing a new vehicle type, or when a manufacturer that has a low-volume manufacturer identifier needs to obtain a high-volume identifier.

Under part 565, NHTSA requires manufacturers to ensure that the VIN of a vehicle uniquely identifies the vehicle and identity of the manufacturer. The VIN must also

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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) 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.

contain information about certain characteristics of the vehicle. The information collection under part 567 is a labeling requirement. Manufacturers are required to certify that the motor vehicles they produce comply with all applicable Federal motor vehicle safety standards (FMVSS) and affix a label to that effect with the identification of the vehicle (by VIN) and the manufacturer. NHTSA will receive the VIN-deciphering and the manufacturer identifier information. The VIN provides information to dealers, consumers, and State titling and registration authorities. The certification label is the only means for NHTSA, State Departments of Motor Vehicles, Customs officials, and law enforcement personnel to know whether a particular vehicle was originally manufactured to meet the FMVSS and the Bumper and Theft Prevention standards to the extent they are applicable. The purpose of the collection is to assist NHTSA's enforcement efforts. The VIN allows NHTSA to identify the responsible manufacturer for vehicles that contain a defect related to motor vehicle safety or do not comply with an applicable FMVSS. As required by 49 U.S.C. § 30115, a manufacturer or distributor of a motor vehicle must certify to the distributor or dealer at delivery that the vehicle complies with applicable FMVSS.

When NHTSA last received approval for this information collection request, the agency estimated that the annual burden for the information collection request was 60,542 hours and \$12,016,260. NHTSA now estimates the annual burden to be 164,016 hours and \$33,686,400. This is an increase of 103,474 hours and \$21,670,140. The increase is almost entirely a result of NHTSA changing the way it estimates burden. However, a small part of the increase is a result of the additional replica vehicle manufacturers expected to be producing motor vehicles.

#### **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.**

#### **49 CFR Part 565**

NHTSA's regulations in 49 CFR Part 565, "Vehicle Identification Number (VIN) Requirements," specify format, contents, and physical requirements for vehicle identification numbers (VIN) and their placement on motor vehicles to simplify vehicle identification information retrieval and increase the accuracy and efficiency of vehicle recall campaigns.

The regulations require each vehicle manufactured in one stage to have a VIN that is assigned by the vehicle's manufacturer. Each vehicle manufactured in more than one stage is to have a VIN assigned by the incomplete vehicle manufacturer. Each VIN must consist of 17 characters, including a check digit in the ninth position whose purpose is to verify the accuracy of any VIN transcription. The VIN must also incorporate a manufacturer identifier that is assigned to the manufacturer by the national

organization responsible for assigning World Manufacturers Identifiers (WMI) in the country where the manufacturer is located. The manufacturer identifier occupies the first three characters of the VIN for manufacturers that produce 1,000 or more vehicles of a specified type per model year and positions 1, 2, 3, 12, 13, and 14 of VINs assigned by manufacturers that produce fewer than 1,000 vehicles of a specified type per model year. The remaining characters of the VIN describe various vehicle attributes, such as make, model, and type, which vary depending on the vehicle's type classification (i.e., passenger car, multipurpose passenger vehicle, truck, bus, trailer, motorcycle, low-speed vehicle, or replica vehicle), and identify the vehicle's model year, plant code, and sequential production number.

Manufacturers intending to manufacture motor vehicles for sale or introduction into interstate commerce in the United States must obtain a manufacturer identifier. The manufacturer identifier, also known internationally as a World Manufacturer Identifier (WMI), is incorporated into the vehicle's VIN (see section below) and uniquely identifies the manufacturer and the vehicle type. NHTSA has a contract with SAE International to assign manufacturer identifiers to manufacturers in the United States. Manufacturers located outside of the United States must obtain a manufacturer identifier from the WMI-issuing entity in the country in which they are located.<sup>2</sup> U.S. manufacturers contact SAE International directly (and not NHTSA) to request the assignment of a manufacturer identifier. They would do so by telephoning 724-772-8511 or by writing to: SAE International, 400 Commonwealth Avenue, Warrendale, PA 15096, Attention: WMI Coordinator.<sup>3</sup>

Each manufacturer of vehicles subject to the requirements of Part 565 must submit, either directly or through an agent, its unique manufacturer identifier for each make and type of vehicle it manufactures at least 60 days before affixing the first VIN using the identifier. For U.S. manufacturers, SAE provides this information directly to NHTSA and, therefore, these manufacturers are not required to submit this information to NHTSA. In addition to obtaining an identifier prior to producing motor vehicles, a manufacturer is also required to obtain a new identifier before producing a new vehicle type (each identifier may only be used for one vehicle type), or when a manufacturer that has a low-volume manufacturer identifier needs to obtain a high-volume identifier.

Manufacturers are also required to submit to NHTSA information necessary to decipher the characters contained in their VINs, including amendments to that information, at least 60 days prior to offering for sale the first vehicle identified by a VIN containing that information. If information concerning vehicle characteristics sufficient to specify the VIN code is unavailable to the manufacturer 60 days prior to offering the vehicle for sale, the information must be submitted within one week of the information becoming available.

#### **49 CFR Part 567**

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<sup>2</sup> If a country does not have a WMI-issuing entity, the manufacturer may request a WMI from SAE. This service is separate from SAE's issuance of WMIs for U.S. manufacturers under contract with NHTSA.

<sup>3</sup> For more information and access to an electronic WMI application for U.S. manufacturers, manufacturers can visit <https://www.sae.org/standardsdev/groundvehicle/vin.htm>. Last accessed January 5, 2022.

Under 49 U.S.C. § 30115, a manufacturer or distributor of a motor vehicle must certify to the distributor or dealer at delivery that the vehicle complies with applicable FMVSS. The statute requires that the certification be provided in the form of a tag or label that is permanently affixed to the vehicle by the time of its delivery to a dealer or distributor. The regulations in 49 CFR Part 567, *Certification*, specify the contents and location of, and other requirements for, the certification label to be affixed to a motor vehicle, as required by the National Traffic and Motor Vehicle Safety Act, as amended (the Vehicle Safety Act) (49 U.S.C. 30115) and the Motor Vehicle Information and Cost Savings Act, as amended (the Cost Savings Act) (49 U.S.C. 30254 and 33109). The purpose of the regulation is to address certification-related duties and liabilities of the manufacturer and to provide the consumer with information to assist in determining which of the Federal motor vehicle safety standards (as found in 49 CFR Part 571), Bumper Standards (as found in 49 CFR Part 581), and Federal Theft Prevention Standards (as found in 49 CFR Part 541) are applicable to the vehicle.

The regulations pertain to manufacturers of motor vehicles to which one or more standards are applicable, including persons who alter such vehicles prior to their first retail sale, and to Registered Importers of vehicles not originally manufactured to comply with all applicable Federal motor vehicle safety standards that are determined eligible for importation by NHTSA, based on the vehicles' capability of being modified to conform to those standards. As outlined in NHTSA's final rule on the implementation of an exemption program for replica vehicles, Part 567 also specifies permanent labeling requirements for replica vehicles.

The regulations require each manufacturer to affix to each vehicle, in a prescribed location, a label that, among other things, identifies the vehicle's manufacturer (defined as the person who actually assembles the vehicle), the vehicle's date of manufacture, and the statement that the vehicle complies with all applicable Federal motor vehicle safety standards and, where applicable, Bumper and Theft Prevention Standards in effect on the date of manufacture. The label must also include the vehicle's gross vehicle and gross axle weight ratings (GVWR and GAWRs), vehicle identification number, and vehicle type classification (i.e., passenger car, multipurpose passenger vehicle, truck, bus, trailer, motorcycle, low-speed vehicle, replica vehicle). In the case of replica vehicles, the label will provide a complete list of the FMVSS to which the vehicle does not comply and a statement that indicates that the vehicle is a replica motor vehicle and identification of the vehicle it replicates by make, model, and model year. The manufacturer, at its option, may list the standards to which the replica vehicle does not comply on a separate label.

The regulations specify other labelling requirements for incomplete vehicle, intermediate, and final-stage manufacturers of vehicles built in two or more stages, such as commercial trucks that are built by adding work performing components, such as a cargo box or cement mixer, to a previously manufactured chassis or chassis-cab, and to persons who alter previously certified vehicles, other than by the addition, substitution, or removal of readily attachable components such as mirrors or tire and rim assemblies,

or minor finishing operations such as painting, before the first purchase of the vehicle for purposes other than resale.

Information on how to complete and affix a vehicle certification label is included on pages 21 through 24 of the requirements handbook at <https://vpic.nhtsa.dot.gov/ManufacturerHandbook.pdf>. Sample certification labels that can be used as guidance for manufacturers of the various types of vehicles that must be certified to the standards are included on pages 43 through 46 of the handbook.

- 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.**

#### **49 CFR Part 565**

NHTSA requires vehicle manufacturers to obtain a manufacturer identifier to incorporate into the VINs they assign to the vehicles they manufacture for sale in the United States and to submit that identifier to NHTSA so that the agency can identify the responsible manufacturer in the event that the vehicle is suspected of containing a defect related to motor vehicle safety or a noncompliance with an applicable FMVSS. If such a defect or noncompliance is found to exist in the vehicle, the manufacturer has an obligation to furnish NHTSA and vehicle owners with notification of the defect or noncompliance and to remedy the defect or noncompliance without charge.

The VIN-deciphering information that NHTSA receives from manufacturers under 49 CFR Part 565 is published on the agency's website at <http://vpic.nhtsa.dot.gov>, and on this website NHTSA provides a VIN-decoding tool. In this manner, it is available to State Departments of Motor Vehicles, customs officers, and law enforcement personnel who have an interest in whether a motor vehicle presented for registration, for importation, or for operation on public roads has been manufactured by a company that is properly registered with NHTSA. These officials use the contents of the VIN-deciphering tables submitted by manufacturers to identify the attributes of the vehicle and to determine whether it can be lawfully registered, imported, or licensed for on-road use in their jurisdiction.

Manufacturers use the vehicle identification number to identify vehicles that are subject to recall to remedy a safety-related defect or noncompliance, and NHTSA uses this information to monitor the success of these recall campaigns. The agency also uses VINs to calculate motor vehicle theft rates by model year/calendar year, as required by Chapter 331 of Title 49, United States Code.

#### **49 CFR Part 567**

Under 49 U.S.C. § 30115, a manufacturer or distributor of a motor vehicle must certify to the distributor or dealer at delivery that the vehicle complies with applicable FMVSS. The statute requires that the certification be provided in the form of a tag or label that is

permanently affixed to the vehicle by the time of its delivery to a dealer or distributor. Manufacturers are not required to apprise NHTSA of the specific vehicles that they manufacture to which standards they comply, and manufacturers do not supply that information to the agency. The presence of the certification label is therefore the only means for NHTSA, State Departments of Motor Vehicles, Customs officials, and law enforcement personnel to know whether a particular vehicle was originally manufactured to meet the FMVSS and the Bumper and Theft Prevention standards to the extent they are applicable. The label contains critical information on the vehicle's gross vehicle and gross axle weight rating that is important for operators to use in determining the extent to which the vehicle can be safely loaded or its capacity for towing another vehicle.

The labels affixed by manufacturers of vehicles built in two or more stages contain information needed by subsequent stage manufacturers in completing the vehicle so that, as finally assembled, it complies with all applicable Federal motor vehicle safety standards. The labels affixed by vehicle alterers assure that a vehicle, as altered, remains in compliance with all applicable standards and identify the responsible party in the event that a safety-related defect or noncompliance is introduced into the vehicle as a result of those alterations. The labels affixed by Registered Importers assure that a vehicle that was not originally manufactured to comply with all applicable FMVSS and Bumper standards has been brought into compliance with those standards and identify the responsible party for providing notification and remedy in the event that the vehicle is found to contain a safety-related defect or noncompliance.

**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.**

**49 CFR Part 565**

The requirement to affix a VIN to each motor vehicle requirement precludes the use of electronic collection. However, NHTSA believes that most manufacturers use automated means for affixing VINs. Although not required, both the process of obtaining a manufacturer identifier from SAE for U.S. manufacturers, and the submission to NHTSA of manufacturer identifiers for non-U.S. manufacturers can be done electronically, and most manufacturers choose this option.

The regulations in part 565 do not mandate that VIN-deciphering information be submitted to NHTSA in a paper format. The vast majority of manufacturers are now submitting the information to the agency electronically using the online portal at <https://vpic.nhtsa.dot.gov> or by email at [manufacturerinfo@dot.gov](mailto:manufacturerinfo@dot.gov). NHTSA provided this option in an effort to improve the accuracy of the submissions, to reduce the volume of paperwork needed to correct inaccurate or incomplete submissions, and to reduce the human resources needed to process the submissions made on paper.

The process for obtaining a manufacturer identifier also provides an option to submit the required information by email or through a website.<sup>4</sup> In recent years, all requests for identifiers have been made electronically. Submissions of manufacturer identifiers by foreign manufacturers can also be done online, and most manufacturers submit the required information in this manner.

#### **49 CFR Part 567**

The regulations in Part 567 require a manufacturer to affix a certification label to each motor vehicle it manufactures for sale in the United States, but do not require manufacturers to submit any information to NHTSA. The use of information technology is therefore not pertinent to this collection.

#### **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.**

#### **49 CFR Part 565**

Under part 565, manufacturers are required to submit manufacturer identifiers to NHTSA at least 60 days before affixing the first VIN using the identifier. This only needs to be done once and, for U.S. manufacturers that obtain identifiers from SAE international under a contract with NHTSA, this does not need to be done at all. Instead, because these identifiers are issued under a contract with NHTSA, SAE international forwards the information directly to NHTSA, eliminating duplication. For non-U.S. manufacturers, however, identifiers are issued by the world manufacturer identifier (WMI)-issuing organization in the country in which the manufacturer is located. Therefore, this information is not available to NHTSA except upon request from the manufacturer.

Manufacturers are required to submit VIN-deciphering information to NHTSA at least 60 days prior to offering for sale the first vehicle identified by a VIN containing that information or if information concerning vehicle characteristics sufficient to specify the VIN code is unavailable to the manufacturer by that date, then within one week after that information first becomes available. After that initial submission, manufacturers are not required to submit any additional VIN-deciphering information unless a change occurs in the information already on file with the agency. It is necessary that this information be furnished by the manufacturer so that NHTSA has accurate VIN-deciphering information to use in the event a safety-related defect or noncompliance should be suspected or found to exist in one of the manufacturer's products. Manufacturers are not required to submit VIN-deciphering information under any other regulation administered by NHTSA. As a consequence, there is no risk for duplication of effort on the manufacturer's part.

#### **49 CFR Part 567**

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<sup>4</sup> For information and access to an electronic WMI application for U.S. manufacturers, manufacturers can visit <https://www.sae.org/standardsdev/groundvehicle/vin.htm>. Last accessed January 5, 2022.

The certification label is affixed to the vehicle by the manufacturer only once. This is generally done at the place of main assembly after all manufacturing operations have been completed on the vehicle. By regulation, the manufacturer is obligated to permanently affix the certification label, so that it is defaced or destroyed if any effort is made to remove the label. As there are no other requirements that manufacturers provide this information on labels affixed to new motor vehicles, there is no duplication.

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

**49 CFR Parts 565 and 567**

The labeling requirements of Parts 565 and 567 apply to all manufacturers of motor vehicles subject to those regulations, including passenger cars, multipurpose passenger vehicles, trucks, buses, trailers, motorcycles, low speed vehicles, and replica motor vehicles. This includes both major manufacturers and smaller companies, which undoubtedly qualify as small businesses or entities. There is no way to minimize the burdens associated with the labeling requirements for the small manufacturer or entity as all motor vehicles covered by the regulations must have labels affixed in a prescribed location that display the vehicle's VIN and provide the other information required by 49 CFR 567.4.

To reduce the burden associated with submitting manufacturer identifier requests to SAE International (for U.S. manufacturers) and manufacturer identifiers to NHTSA (for non-U.S. manufacturers), each process allows electronic submission. The information required for these submissions is minimal and, therefore, the burden is also minimal.

The amount of time necessary to comply with the requirement for submission of VIN-deciphering information to NHTSA varies with the amount of material submitted, which is a product of the number of makes and models of vehicles a company produces. Therefore, a small company with a limited production of motor vehicles will incur little burden.

Additionally, to reduce burden, NHTSA has provided sample tables that can be used to submit VIN deciphering information to NHTSA, as well as sample letters that can be used to forward that information to the agency, which are included on pages 35 through 42 of a document entitled *New Manufacturers Handbook* that can be accessed on the agency's website at: <https://vpic.nhtsa.dot.gov/ManufacturerHandbook.pdf>. A description of how to configure a VIN can be found on pages 9 through 20 of the handbook and a description of how to report VIN deciphering information to NHTSA can be found on page 21 of the handbook.



**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.**

**49 CFR Parts 565 and 567**

If vehicle identification numbers were not assigned to motor vehicles, and inscribed on the certification labels affixed to those vehicles, there would be no way to identify particular vehicles that contain safety-related defects or do not comply with applicable Federal motor vehicle safety standards, and are therefore subject to safety recall campaigns. NHTSA and vehicle manufacturers would also be unable to identify current owners of vehicles to advise them of safety recall campaigns. Continuing to drive vehicles with safety-related problems could endanger vehicle owners and other motorists and highway users. The absence of a VIN would also impair the ability of State Departments of Motor Vehicles to register vehicles for use on public roads. It would also impair the ability of law enforcement personnel to investigate vehicle theft and the trafficking in stolen vehicle parts, as well as the ability of automotive insurance companies to provide coverage to vehicle owners.

The manufacturer identifier portion of the VIN identifies the vehicle's manufacturer. If that information is not supplied to NHTSA, it would impair the agency's ability to notify the responsible manufacturer in the event that the agency should suspect or find a motor vehicle to contain a safety-related defect or a noncompliance with a safety standard.

The certification label is only affixed to new vehicles once and it serves as an assertion that the vehicle to which it is affixed complies with all applicable FMVSS in effect on its date of manufacture. The certification label also provides consumers with information to help them understand which FMVSS and Bumper Standards are applicable to the vehicle. If manufacturers do not provide the certification label, it will not satisfy the requirements of 49 U.S.C. 30115 and consumers will not be provided important information about their vehicle and the identification of the vehicle manufacturer.

**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 on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

A copy of NHTSA's NPRM proposing the regulations for implementation of the replica motor vehicle program (85 FR 792, January 7, 2020) is included with this submission. NHTSA is also attaching a copy of the final rule implementing those regulations (87 FR 13209, March 9, 2022), which also discusses NHTSA's response to comments.

NHTSA received two comments on the NPRM related to this ICR. American Association of Motor Vehicle Administrators (AAMVA) asked for clarification that NHTSA is not changing current coding, and expressed concern that many other State data systems would require changes if this were the case. One individual stated that the make, model, and model year of the replicated vehicle should be coded in the VIN. The Association for the Work Truck Industry (NTEA) recommended putting all requirements in part 586 as was done in part 595, "Vehicle Modifications to Accommodate People with Disabilities," rather than amending parts 567 and 568.

As NHTSA discusses in the final rule, the rule does not change how VINs are coded for non-replica motor vehicles. Instead, the primary change it makes is to add requirements unique to replica motor vehicles--most notably the requirement that, in addition to the information required for the replica motor vehicle's type classification, the manufacturer

must code the make, model, and year of the original motor vehicle being replicated into the “vehicle attributes” section of the VIN (positions four through eight). NHTSA does not anticipate that States must change their VIN coding system because of the replica vehicle VIN requirements.

NHTSA is not adopting NTEA’s suggestion that the labeling requirements for replica vehicles should be moved from the certification regulation (49 CFR part 567) to part 586. The commenter would like part 586 to contain all the requirements for replica vehicles, in a manner similar to that of 49 CFR part 595 subpart C, which sets forth an exemption from the Safety Act’s “make inoperative” provision. NHTSA has decided not to use the approach of subpart C because the scope of the replica vehicle regulation is much broader, and more comprehensive, than the make inoperative exemption program of part 595 subpart C. The replica vehicle regulation pertains to the manufacture of new vehicles and involves exempting the vehicles from the Safety Act’s directive to meet Federal crash avoidance and crashworthiness standards. The regulation setting forth an exemption from the make inoperative requirement is narrow and could be self-contained in a single subpart. In addition, regarding the labeling requirement at issue, we believe it makes sense to establish the requirement in part 567 because the label for replica vehicles serves to replace the certification label required by part 567 for nonexempt vehicles. It is fitting to place the requirement in part 567, since that is NHTSA’s designated location for permanent label requirements relating to a manufacturer’s certification of compliance with, or exemption from, the FMVSS.

However, NHTSA is making a slight revision to part 586 in response to NTEA’s comment. The agency emphasizes that each replica vehicle manufacturer is responsible for knowing and meeting all NHTSA requirements that apply to the manufacture and sale of its vehicles; NHTSA had included text on that basic tenet in proposed § 586.5(c). After considering NTEA’s comment, we added a clause to paragraph (c) to refer to part 567. New § 586.5(c) states that each replica motor vehicle manufacturer shall meet all statutory and regulatory requirements, including requirements at 49 CFR part 567. NHTSA believes this addition will make it more convenient for replica vehicle manufacturers to locate the labeling requirements in part 567 and will illustrate there are Safety Act requirements of which they must be aware contained other than in part 586.

**9. 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 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.**

No assurance of confidentiality is given for the information collected under 49 CFR Part 567. That information is not submitted to NHTSA but is instead inscribed on the certification labels affixed to motor vehicles in accordance with the requirements of the regulations in that part. Likewise, the requirement to affix VINs to motor vehicles does not involve submission of information to NHTSA, and therefore, does not receive any assurance of confidentiality. For submissions of information for manufacturer identifiers, manufacturer identification information is made available to the public and, is therefore, not afforded confidentiality. Manufacturers can request confidentiality for VIN deciphering information submitted to the agency under 49 CFR Part 565. Requests for confidentiality are made in accordance with the agency's regulations at 49 CFR Part 512 *Confidential Business Information*. If such a request is granted, the contents of the Part 565 submission will not be published on the agency's website at <https://vpic.nhtsa.dot.gov/> until the information ceases to be commercially sensitive.

- 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.**

No other questions on matters that are commonly considered sensitive are involved in these information collections.

- 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.**

This ICR covers 5 information collections that fall under 49 CFR Part 565 and 49 CFR Part 567.

Table 1 provides a list of the information collections.

**Table 1: List of Information Collections**

<b>Information Collections in this ICR</b>
1. Part 565: Requirement to Obtain Manufacturer Identifiers and Update Existing Information
2. Part 565: Requirement to Submit Manufacturer Identifiers
3. Part 565: Requirement to Submit VIN-Deciphering Information
4. Part 565: Requirement to Affix Conforming VINs to Vehicles
5. Part 567: Requirement to Affix Certification Labels to Vehicles

## **Part 565**

The first information collection is the requirement for manufacturers to obtain manufacturer identifiers and updated existing information. NHTSA estimates that whenever a manufacturer is required to obtain a new manufacturer identifier (e.g., before producing motor vehicles for the first time, before producing motor vehicles of a new type), the manufacturer will spend approximately 15 minutes compiling and submitting the information required to request a new manufacturer identifier. NHTSA also estimates that submitting updated information will take manufacturers approximately 15 minutes. NHTSA assumes that foreign manufacturers will already have manufacturer identifiers for use on vehicles for sale in their country of origin. Accordingly, the only additional burden associated with the requirement to obtain manufacturer identifiers or update existing information would be incurred by U.S. manufacturers. In 2019, SAE International received 376 requests for new U.S. manufacturer identifiers and 92 submissions of updated information. In 2020, NHTSA received 571 requests for new U.S. manufacturer identifiers and 95 submissions of updated information. Based on an average for these two years, NHTSA estimates that there will be 474 requests for new manufacturer identifiers and 94 submissions of updated information, for a total of 568 manufacturer identifier submissions per year. NHTSA estimates that each of these submissions will be from unique manufacturers, and therefore, the per respondent burden would be 15 minutes. NHTSA estimates the total burden for these manufacturer identifier submissions to be 142 hours per year  $((15 \text{ minutes} \times 568 \text{ submissions}) \div 60 \text{ minutes/hour})$ .

The second information collection covers the requirement to submit manufacturer identifier information to NHTSA. As described in response to question 2, U.S. manufacturers are not required to submit this information to NHTSA because SAE International provides it. Foreign manufacturers, however, are required to submit this information. NHTSA estimates that compiling and submitting the information takes approximately 15 minutes. NHTSA received 52 submissions in 2019, 42 submissions in 2020, and 78 submissions in 2021. Based on an average for the past three years, NHTSA estimates that it will receive, on average, 57 manufacturer identifier submissions from foreign manufacturers each year. NHTSA estimates that each of these submissions will be from unique manufacturers, and therefore, the per respondent burden would be 15 minutes. NHTSA estimates the total burden for these manufacturer identifier submissions to be approximately 14 hours per year  $((15 \text{ minutes} \times 57 \text{ submissions}) \div 60 \text{ minutes/hour} = 14.25 \text{ hours})$ .

The third information collection covers the requirement to submit VIN-deciphering information to NHTSA. NHTSA estimates that compiling and submitting VIN-deciphering information takes, on average 1 hour per submission. NHTSA received 837 submissions from 490 manufacturers in 2019; 1,062 submissions from 610 manufacturers in 2020; and 1,235 submissions from 710 manufacturers in 2021. Based on an average of the past three years, plus an additional 15 for replica motor vehicle submissions from 15 replica vehicle manufacturers, NHTSA estimates that it will receive an average of 1,060 VIN-deciphering submissions each year from 618 manufacturers. Accordingly, NHTSA estimates the total burden for VIN-deciphering information to be 1,060 hours  $(1,060 \text{ submissions} \times 1 \text{ hour})$  and the per respondent burden to be 1.72 hours  $(1,060 \text{ hours} \div 618$

manufacturers).

The fourth information collection covers the requirement to affix conforming VINs to vehicles. NHTSA estimates that there will be approximately 17,600,000 new vehicles manufactured and sold in each of the next three years. To avoid double counting burden, NHTSA estimates the burden associated with affixing VINs by looking at only the burden for affixing VINs when the VIN appears on the vehicle separate from the certification label. NHTSA estimates that 85% of vehicles, or approximately 14,960,000 vehicles, will have VINs affixed separately from the certification label. NHTSA estimates that affixing these VINs will take 18 seconds (.005 hour). Therefore, NHTSA estimates the total annual burden for affixing VINs to be approximately 74,800 hours ((14,960,000 vehicles × .005 hour) and estimates the per respondent burden to be approximately 121 hours (74,800 hours ÷ 618 manufacturers = 121.04 hours).

### Part 567

The fifth information collection covers the requirement to permanently affix certification labels to motor vehicles. NHTSA estimates that approximately 618 manufacturers of motor vehicles of all types, including manufacturers of passenger cars, multipurpose passenger vehicles, trucks, buses, trailers, motorcycles, low-speed vehicles, and replica motor vehicles, as well as incomplete vehicle manufacturers, intermediate and final stage manufacturers of vehicles built in two or more stages, and vehicle alterers, will need to comply with the certification labeling requirements of Part 567. NHTSA estimates that there will be approximately 17,600,000 new vehicles manufactured and sold in each of the next three years and estimates that it will take approximately 18 seconds (.005 hours) to affix each certification label. Accordingly, NHTSA estimates the total annual burden for affixing certification labels to be approximately 88,000 hours (17,600,000 vehicles × .005 hours) and estimates the per respondent burden to be approximately 142 hours (88,000 hours ÷ 618 manufacturers =142.39 hours).

NHTSA estimates the aggregate annual burden of the five information collections is 164,016 hours. Table 2 provides a summary of the burden hours.

**Table 2: Summary of Burden Hour Estimates**

<b>Information Collection Title</b>	<b>Number of Respondents</b>	<b>Number of Responses (per Respondent)</b>	<b>Burden per Response</b>	<b>Burden per Respondent</b>	<b>Total Burden</b>
<b>Part 565: Requirement to Obtain Manufacturer Identifiers &amp; Updating Existing Information</b>	568	568 (1)	15 minutes	15 minutes	<b>142 hours</b>
<b>Part 565: Requirement to Submit Manufacturer Identifiers</b>	57	57 (1)	15 minutes	15 minutes	14.25 hours <b>14 hours</b>

<b>Part 565: Requirement to Submit VIN-Deciphering Information</b>	618	1,060 (1.72)	1 hour	1.72 hours	<b>1,060 hours</b>
<b>Part 565: Requirement to Affix Conforming VINs to Vehicles</b>	618	17,600,000 (28,479)	15.3 seconds	121.04 hours	<b>74,800 hours</b>
<b>Part 567: Requirement to Affix Certification Labels to Vehicles</b>	618	17,600,000 (28,479)	18 seconds	142.39 hours	<b>88,000 hours</b>
<b>Total:</b>					<b>164,016 hours</b>

### Costs Associated with Labor Hours

For each of the five information collections, NHTSA has estimated the costs associated with the burden hours. NHTSA estimates the labor cost associated with this collection of information by (1) applying the appropriate average hourly labor rate published by the Bureau of Labor Statistics (BLS), (2) dividing by 0.702<sup>5</sup> (70.2%), for private industry workers to obtain the total cost of compensation, and (3) multiplying by the estimated burden hours for each respondent type.

NHTSA estimates the labor cost for compiling and submitting the required information under 565 to be \$60.26<sup>6</sup> per hour using the mean hourly wage estimate published by BLS for compliance officers in the motor vehicle manufacturing industry (Standard Occupational Classification # 13-1041). NHTSA uses this estimate for the three reporting requirements in this ICR (the requirement to obtain manufacturer identifiers and update existing information, the requirement to submit manufacturer identifiers, and the requirement to submit VIN-deciphering information).

NHTSA estimates the labor cost for labeling vehicles and affixing VINs to be \$32.83 per hour,<sup>7</sup> using the Bureau of Labor Statistic's mean hourly wage estimate for motor vehicle assemblers and fabricators (Standard Occupational Classification #51-2000).

Table 3 below provides a summary of the estimated labor costs associated with the burden hours.

**Table 3: Summary of Labor Cost Estimates**

<sup>5</sup> See Table 1. Employer Costs for Employee Compensation by ownership (June 2021), available at [https://www.bls.gov/news.release/archives/ecec\\_06182020.pdf](https://www.bls.gov/news.release/archives/ecec_06182020.pdf), last accessed October 15, 2021.

<sup>6</sup> The hourly wage is estimated to be \$42.30 per hour. National Industry-Specific Occupational Employment and Wage Estimates NAICS 336100 - Motor Vehicle Manufacturing, May 2020, [https://www.bls.gov/oes/current/naics4\\_336100.htm](https://www.bls.gov/oes/current/naics4_336100.htm), last accessed October 15, 2021. The Bureau of Labor Statistics estimates that wages represent 70.2 percent of total compensation to private workers, on average. Therefore, NHTSA estimates the total hourly compensation cost to be \$60.26.

<sup>7</sup> The hourly wage is estimated to be \$23.18 per hour. National Industry-Specific Occupational Employment and Wage Estimates NAICS 336100 - Motor Vehicle Manufacturing, May 2020, [https://www.bls.gov/oes/current/naics4\\_336100.htm#47-0000](https://www.bls.gov/oes/current/naics4_336100.htm#47-0000), last accessed October 12, 2021. The Bureau of Labor Statistics estimates that wages represent 70.2 percent of total compensation to private workers, on average. Therefore, NHTSA estimates the total hourly compensation cost to be \$33.02.

Information Collection Component	Cost per Burden Hour	Burden Hours per Respondent	Total Labor Cost per Respondent	Total Burden Hours	Total Labor Costs
Part 565: Requirement to Obtain Manufacturer Identifiers & Updating Existing Information	\$60.26	15 minutes	\$15.07	142 hours	\$8,556.92
Part 565: Requirement to Submit Manufacturer Identifiers	\$60.26	15 minutes	\$15.07	14 hours	\$843.64
Part 565: Requirement to Submit VIN-Deciphering Information	\$60.26	1.72 hours	\$103.36	1,060 hours	\$63,875.60
Part 565: Requirement to Affix Conforming VINs to Vehicles	\$33.02	121.04 hours	\$3,996.60	74,800 hours	\$2,469,896.00
Part 567: Requirement to Affix Certification Labels to Vehicles (labeling)	\$33.02	142.39 hours	\$4,701.88	88,000 hours	\$2,905,760.00
<b>Total:</b>				164,016	\$5,448,932.16

**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.**

NHTSA estimates that approximately 17,600,000 vehicles will require Part 565 VIN labeling and Part 567 labeling in each of the next three years. While VINs for some vehicles will be engraved or embossed on vehicles, other VINs will only appear on the certification label. To estimate the costs associated with putting VINs on vehicles and affixing certification labels, NHTSA conservatively estimates that 85% of vehicles will have certification labels and will separately have the VINs engraved or embossed on the vehicles. For the remaining 15% of vehicles, NHTSA assumes that the vehicles will only have a certification label that both meets the requirements in part 567 and displays the VIN, satisfying the requirement to do so in part 565.

NHTSA estimates that the cost to print each certification label is \$0.35. Therefore, the total cost for printing labels is estimated to be \$6,160,000 (17,600,000 vehicles × \$0.35).



NHTSA estimates the cost for engraving or embossing VINs based on the cost estimates for stamping VINs onto vehicle parts for purposes of complying with the parts-marking requirements in 49 CFR part 541. In the 1985 Final Regulatory Evaluation for part 541, we estimated the cost of stamping vehicles at \$0.686 per part (in 1984 dollars).<sup>8</sup> In 2021 dollars (the most recent year for which Consumer Price Index (CPI) information is available), this cost would be \$1.84 per part ( $(0.686 \times 278.8^9) \div 103.9$  using the 2021 CPI divided by the 1984 CPI). Using this, NHTSA estimates that the cost of engraving or embossing VINs to be \$1.84 per vehicle or \$27,526,400 for the estimated 13,200,000 vehicles that will have engraved or embossed VINs (14,960,000 vehicles  $\times$  \$1.84 per vehicle).

Therefore, NHTSA estimates the total cost to respondents is \$33,686,400.

**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.**

The agency expends \$118,508.93 on an annual basis for the maintenance of the website at <https://vpic.nhtsa.dot.gov/> that can be used by manufacturers to electronically submit VIN-deciphering information required under Part 565 and the databases used to house that information and other related data. In addition, the agency expends \$43,144.10 per year on Federal salaries and contract support devoted to the review and processing of Part 565 submissions, and to provide a manufacturer's helpdesk to answer questions concerning manufacturer requirements under Part 565 and other related provisions. There is no annualized cost to the Federal Government for the information collections associated with Part 567.

**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.**

When NHTSA last received approval for this information collection request, the agency estimated that the annual burden for the information collection request was 60,542 hours and \$12,016,260. NHTSA now estimates the annual burden to be 164,016 hours and \$33,686,400. This is an increase of 103,474 hours and \$21,670,140. The increase is almost entirely a result of NHTSA changing the way it estimates burden. However, a

<sup>8</sup> <https://www.regulations.gov/document/NHTSA-2002-12231-0035>.

<sup>9</sup> Consumer Price Index-December 2021, Bureau of Labor Statistics, [https://www.bls.gov/news.release/archives/cpi\\_01122022.pdf](https://www.bls.gov/news.release/archives/cpi_01122022.pdf). Last Accessed January 20, 2022.

small part of the increase is a result of the additional replica vehicle manufacturers expected to be producing motor vehicles.

- 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.**

The information submitted under Part 565 is posted to the agency's website at <https://vpic.nhtsa.dot.gov/>. It is not published in any other form.

- 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.**

Approval is sought to not display the expiration date for OMB approval because the requirements are contained in a regulation and rulemaking would be required to display the expiration date.

- 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.**

No exceptions to the certification statement are made.