

## Supporting Statements: Part A

### Consolidated Labeling Requirements for 49 CFR Part 541 and Procedures for Selecting Lines to be Covered by the Theft Prevention Standard for 49 CFR Part 542 (OMB Control Number 2127-0539)

#### Abstract:<sup>1</sup>

This information collection supports the Federal Motor Vehicle Theft Prevention Standard's requirements that certain vehicle lines be marked with identifying symbols or numbers (parts-marking) to reduce the incidence of motor vehicle thefts through tracing and recovery of parts from stolen vehicles. In addition to the parts-marking requirements, vehicle manufacturers must submit certain information to the National Highway Traffic Safety Administration (NHTSA) about their vehicle lines covered by this standard and must maintain that information for the duration of the production of a vehicle line. There are five information collections in this request: (1) the requirement to mark major parts of covered motor vehicles; (2) the requirement to submit to NHTSA target areas showing where the parts will be marked; (3) the requirement that manufacturers maintain the designated target areas for the duration of the production of the vehicle line; (4) the requirement for manufacturers of new LDT lines to submit information to NHTSA to allow the agency to determine whether the LDT line will be required to comply with the parts-marking requirements because it is likely to be a high theft line; and (5) the requirement for manufacturers of new LDT lines to submit information to NHTSA to allow the agency to determine the LDT will be required to comply with the parts-marking requirements because it contains major parts that are interchangeable with the majority of the covered major parts of passenger motor vehicles covered by the standard.

By way of background, 49 U.S.C. Chapter 331 requires NHTSA, by delegation from the Secretary of Transportation, to promulgate a theft prevention standard to provide for the identification of certain motor vehicles and their major replacement parts (parts-marking) to impede motor vehicle theft. 49 U.S.C. 33102 requires NHTSA to prescribe a standard for identifying major parts of new motor vehicles and major replacement parts for high theft lines and inscribing or affixing numbers or symbols on those parts. 49 U.S.C. 33104 designates which motor vehicle lines and parts are high theft and requires, by regulation, that each manufacturer provides information necessary to select the high theft lines and the major parts of the vehicles in those lines that are to be subject to the Theft Prevention Standard.

49 CFR Part 541 specifies performance requirements for identifying numbers or symbols to be placed on major parts of passenger motor vehicles subject to the Theft Prevention Standard, which includes: (1) all passenger cars, (2) multipurpose passenger vehicles with a gross vehicle

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

weight rating (GVWR) of 6,000 pounds or less, (3) all light-duty trucks (LDTs) determined to be high-theft (with a gross vehicle weight rating of 6,000 pounds or less), and (4) all low-theft LDTs with major parts that are interchangeable with a majority of the covered major parts of those passenger motor vehicle lines subject to the standard.

Each manufacturer of a passenger motor vehicle subject to this standard must have the vehicle identification number (VIN) affixed or inscribed on each of the parts specified in 49 CFR 541.5. In the case of passenger motor vehicles not originally manufactured to comply with applicable U.S. vehicle safety standards, each such motor vehicle subject to this standard must have an identifying number inscribed in a manner which conforms to the regulation.

49 CFR Part 542 requires manufacturers of light duty trucks to identify new model introductions that are likely to be high-theft vehicle lines as defined in 49 U.S.C. 33104.

This information collection and parts-marking requirement supports the goals of the Motor Vehicle Theft Law Enforcement Act of 1984 and subsequent laws by giving law enforcement personnel tools to deter theft, trace stolen vehicles and parts, and apprehend and convict thieves. The identification of major parts of high-theft motor vehicle lines decreases automobile theft by making it more difficult for criminals to “chop” vehicles into component parts and then fence such parts.

This is a reinstatement that increases burden by 150,550 hours and \$24,003,000. However, during the previous submission the hours were 267,356, which now is a reduction of 116,806 hours from the previous submission. This reduction is due to the decreased number of vehicles requiring stamping (previously 8 million) and the number of target area submissions (previously 30). The costs for printing have reduced \$57,917,000 (from \$81,920,000) from the last OMB approval. Not only have the number of vehicles reduced by 3.5 million, but the previous approval included labor costs (burden hour costs) in the printing costs. The printing cost per vehicle, \$5.33, has remained the same.

#### **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 statute or regulation mandating or authorizing the collection of information.**

This information collection supports the purpose of the Motor Vehicle Theft Law Enforcement Act of 1984 (Theft Act; Pub. L. 98-547) and subsequent laws, including the Anti-Car Theft Act of 1992 (Pub. L. 102-519), to reduce the incidence of motor vehicle thefts by facilitating the tracing and recovery of parts from stolen vehicles. This program gives law enforcement personnel tools to deter thefts, trace stolen vehicles and parts, and apprehend and convict thieves.

49 CFR Part 541

The 1984 Theft Act required specified parts of high theft vehicles to be marked with vehicle identification numbers. Pursuant to these requirements, 49 CFR Part 541 specifies the performance requirements for identifying numbers or symbols (generally the Vehicle Identification Number (VIN)) to be placed on major parts of certain passenger motor vehicles. Specifically, VIN labels must be permanently affixed to each listed part specified in 49 CFR 541.5(a), if the part is present on the motor vehicle.

The standard applies to passenger motor vehicle parts that are present in (1) all passenger cars, (2) multipurpose passenger vehicles with a gross vehicle weight rating (GVWR) of 6,000 pounds or less, (3) all light-duty trucks (LDTs) determined to be high-theft (with a GVWR of 6,000 pounds or less), and (4) all low-theft LDTs with major parts that are interchangeable with a majority of the covered major parts of those passenger motor vehicle lines subject to the standard. In addition, the standard applies to replacement motor vehicle parts for those four categories of vehicles. For each vehicle line, manufacturers inform NHTSA of the location of the VIN marking on each part (target area) and the location of the VIN marking for the replacement part. This information is publicly available to aid law enforcement personnel in tracing stolen vehicles and their parts. In addition, the manufacturer must maintain the target area designated for a part on a vehicle line for the duration of the production of the vehicle line, unless a restyling of the part makes it no longer practicable to mark within the original target area.

#### 49 CFR Part 542

NHTSA's regulations at Part 542 implementing the 1992 Theft Act set forth the procedures for motor vehicle manufacturers and NHTSA to follow in the determination of whether any new light duty truck (LDT) line is likely to have a theft rate above or below the 1990/91 median theft rate. Each manufacturer that plans to introduce a new LDT line into commerce in the United States must use criteria defined in 49 CFR Part 542 to determine whether the new line is likely to have a theft rate above or below the 1990/91 median theft rate. The manufacturer must submit its evaluations and conclusions together with any supporting data on the new light duty truck to NHTSA at least 15 months before introduction of the vehicle into U.S. commerce. NHTSA then determines whether the new LDT line should or should not be subject to the parts-marking requirements.

In addition, Part 542 sets forth the procedures for motor vehicle manufacturers and NHTSA to follow in the determination of whether any light duty truck lines that have or are likely to have a low theft rate have major parts interchangeable with a majority of the covered major parts of a passenger motor vehicle line. If the manufacturer concludes that a light duty truck line that has or is likely to have a theft rate below the median theft rate and has major parts that are interchangeable with a majority of the covered major parts of a passenger motor vehicle line, the manufacturer determines whether all the vehicles of those lines with sub-median or likely sub-median theft rates will account for more than 90 percent of the total annual production of all of the manufacturer's lines with those interchangeable parts. The manufacturer must submit its evaluation and conclusions together with underlying factual information to NHTSA at least 15 months before introduction of the vehicle into U.S. commerce. NHTSA then determines whether the line should or should not be subject to the parts-marking requirements.

- 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 541

The identification of major parts of high-theft motor vehicle lines is designed to decrease automobile theft by making it more difficult for criminals to “chop” vehicles into component parts and then fence such parts. The information received from this collection aids law enforcement officials at all levels of government in the investigation of “chop shops” by creating evidence for prosecution of the operators for possession of stolen motor vehicle parts. Officials have great difficulty in establishing that particular parts in the possession of a “chop shop” are in fact stolen when the parts are not marked. Major parts are marked on high-theft vehicle lines. If a vehicle is stolen and “chopped” into its components, the parts are normally fenced to auto body shops for either a specific repair or general stock. Operators of both “chop shops” and auto body repair shops would avoid possession of parts bearing identification that links the parts to a stolen vehicle. Thus, Congress intended for major parts identification to decrease the market for stolen parts and, therefore, decrease the incentive for motor vehicle theft.

#### 49 CFR Part 542

These statutorily mandated procedures require that manufacturers apply the relevant criteria for selecting new light duty truck lines likely to have high or low theft rates to their currently produced and planned vehicles, and submit an initial determination of which of their LDT lines and low-theft truck lines having a majority of their major component parts interchangeable with those of a high-theft passenger motor vehicle line should be selected as likely high-theft vehicle lines, together with the factual information considered in reaching that determination. These procedures are required. Manufacturers must submit information on new vehicles and required supporting information at least 15 months prior to the vehicle’s introduction into U.S. commerce. NHTSA then uses this information to aid in its determination of which LDT or low-theft truck lines are covered by the standard.

- 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 Parts 541 and 542 do not impose any obstacles for automobile manufacturers to use technological collection techniques or other forms of information technology for transmission and storage of the information. For the information required to be submitted to NHTSA, a manufacturer may use any form of improved information technology it deems necessary that minimizes the burden as long as the required reports are provided. Manufacturers have chosen to submit this information to NHTSA in hard copy form. However, to increase information

technology, the agency will continue to encourage manufacturers to submit this information electronically by using computer disks (NHTSA-approved format) and by email. Approximately one percent (1%) of Part 541 and 542 submissions come in electronically. For the parts-marking requirements, manufacturers may use automated processes to reduce burden and are permitted to do so as long as the required information is placed on the specified parts in a manner permissible under the statute and regulations.

**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.**

This information is not required by any other law or regulation and would not be available without the regulation. Congress expressly addressed the issue of duplication by prohibiting any requirement that a part have more than a single identification (Cost Savings Act Section 602(d)(1)). No other agency is responsible for collecting information on the Theft Prevention Standard. Without Part 541, information of this sort would not be available to law enforcement officials or the general public. Without Part 542, the agency would not be able to fulfill the statutory requirements of selecting likely high-theft LDT lines. The information needed is not available elsewhere.

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

49 CFR Part 541

49 CFR 541.3(b) states that the Theft Prevention Standard does not apply to subject passenger motor vehicle parts that are present in vehicles manufactured by a motor vehicle manufacturer that manufactures fewer than 5,000 vehicles for sale in the United States each year. Manufacturers of replacement parts, who often will be smaller than motor vehicle manufacturers, may have a lighter burden because Section 602(d)(2)(B) prohibits any requirement of more identification on a replacement part than a symbol identifying the manufacturer and a common symbol identifying the part as a major replacement part.

49 CFR Part 542

NHTSA does not expect any small businesses or small entities to be affected by this regulation.

**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 Part 541

The Theft Act requires specified parts of high theft vehicles to be marked. The most important feature of the Theft Prevention Standard (49 CFR Part 541) is that the manufacturer must mark all vehicles of a line throughout the production period of the line. If the manufacturer marked

the major parts of all vehicles, finding an unmarked major part would be strong evidence that the identification has been removed from the part in violation of the law. If some vehicles are not marked, however, the evidentiary value is lost.

In addition, if this information were not available, the legislative goal of a comprehensive scheme against automobile theft would be complicated. The Theft Prevention Standard would not effectively deter "chop shop" operators because law enforcement officials could not readily identify parts in the operators' possession as stolen. Also, stolen parts, when recovered, could not easily be traced back to the proper owner and returned to the owner or insurer.

#### 49 CFR Part 542

The submittal of the information requested by 49 CFR §§ 542.1 and 542.2 for selecting new light duty truck lines likely to have high or low theft rates will be a one-time-only submission. If this information is not submitted or an agreement is not met between the agency and the manufacturers, the agency, in accordance with § 33104 shall unilaterally select the lines and parts after notice to the manufacturer and an opportunity for written comment.

- 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 these collections 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.**

The agency solicited public comment on the reinstatement of this previously approved collection of information in the Federal Register (see 60-day Federal Register No. 87 FR 1833, January 12, 2022) (copy will be attached). No public comments were received in response to this request. NHTSA is in regular communication with manufacturers due to reporting of target areas under part 541 and submissions of determinations under part 542. While NHTSA often provides explanations of how to comply with the requirements, NHTSA has not received feedback indicating that the process is burdensome or that NHTSA's estimates of burdens are incorrect.

On May 3, 2022, NHTSA published a 30-day federal register document (87 FR 26256) announcing NHTSA's intention to submit the information request to OMB and requesting public comment.

- 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 given to any respondent in connection with these information collections.

- 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.**

Manufacturers may seek confidential treatment of their submissions under 49 CFR Part 512, which sets forth the procedures for seeking confidentiality. Under Part 512, the respondents will provide any confidential information directly to NHTSA's Chief Counsel.

- 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 questions of a sensitive nature are involved in these data 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.**

49 CFR Part 541

Current information indicates there has been a gradual increase in new vehicle manufacturer mergers, granting of parts-marking exemptions (49 CFR Part 543) and vehicle design stability which have resulted in decreased production of vehicles requiring parts-marking. The agency estimates that, based on the most currently available data, there has been a decrease in the production of vehicles requiring parts-marking from 8 million vehicles to approximately 4.5 million for all manufacturers. To calculate the burden associated with the parts marking requirement, NHTSA assumes that manufacturers will use the least burdensome method for complying with the requirement, based on historical practice and the agency's current understanding of how manufacturers fit labeling into the vehicle assembly line. For the anti-theft requirement, the cost of labeling the major parts (i.e., a paper label with the VIN is placed on each major part) is less than the cost of stamping the VIN on each major part with a stamping machine.

To meet the Theft Prevention Standard, the agency estimates that the time to number and affix the average of 14 labels to each vehicle is approximately 2 minutes. If 4.5 million vehicles are covered, the hourly burden for labeling 4.5 million motor vehicles would be 150,000 hours (4.5 million cars × 2 minutes per car ÷ 60 minutes in an hour).

The agency estimates that the time to stamp both the engine and transmission will take approximately 1 minute. If 4.5 million vehicles are covered, the total burden for stamping is estimated to total 75,000 hours (4.5 million cars × 1 minute per car ÷ 60 minutes in an hour). Please note that in this analysis each vehicle would either have its major parts labeled or stamped, but not both. As discussed above, since affixing paper labels is expected to be the less burdensome means of compliance for manufacturers, NHTSA has estimated the burden of the parts marking requirements using the estimates for affixing paper labels. Therefore, NHTSA estimates the total burden for parts-marking to be 150,000 hours annually.

Each manufacturer of vehicles that are required to be parts-marked must submit reports of the target area locations for the labels or stamping. The target area designated for a part on a vehicle line shall be maintained for the duration of the production of the vehicle line, unless a restyling of the part makes it no longer practicable to mark within the original target area. If there is such a restyling, the vehicle manufacturer shall inform NHTSA of that fact and provide a new target area submission. NHTSA estimates that there is no additional hour burden to maintain the target area designation because maintaining the designation is built into the production process of a new vehicle line and the record of the target designation is kept electronically in the normal course of business.

NHTSA estimates that approximately 70 target area responses will be submitted to the agency in the next three years, or approximately 23 submissions each year. This estimate is based on the number of the submissions over the three-year period for MYs 2019-2021. Specifically, 18, 29 and 23 target areas were submitted for MYs 2019, 2020 and 2021, respectively.

NHTSA estimates there will be a total of 23 target areas submitted by approximately 21 manufacturers each year. The average time to prepare and submit the target areas will be 20 hours for each submission. The burden hour for submissions will be 460 hours (23 submissions × 20 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>2</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 costs associated with preparing and affixing labels to 14 major parts under § 541.5(a) using the average wage for manufacturers and assemblers in the motor vehicle manufacturing industry (Standard Occupational Classification #51-2000), which BLS estimates to be \$23.18<sup>3</sup> per hour. Using this estimate, NHTSA estimates the total compensation costs per hour to be \$33.02 per hour (\$23.18 per hour ÷ 0.702). Therefore, NHTSA estimates the total labor cost to be \$4,953,000 annually (\$33.02 × 4.5 million vehicles, and \$1.10 per vehicle).

NHTSA estimates the labor costs associated with developing and submitting reports of the target area locations for labels or stamping under § 541.5(e) using the average wage for compliance officers in the motor vehicle manufacturing industry (Standard Occupational Classification #13-1041), which BLS estimates to be \$42.30<sup>4</sup> per hour. Using this estimate, NHTSA estimates the total compensation costs per hour to be \$60.26 per hour (\$42.30 per hour ÷ 0.702). The labor cost to prepare each report submitted under § 541.5(e) is estimated to be \$1,205.20 (\$60.26 × 20 hours per submission), and the total labor cost for the estimated 23 target area reports that will be submitted each year is estimated to be \$27,720 (\$1,205.20 × 23 reports, rounded).

We estimate that Part 541 will impose an annual reporting burden of 150,460 burden-hours, and the total estimated labor costs associated with these burden hours endured by the responding manufacturers are \$4,977,720 (\$4,950,000 + \$27,720)

#### 49 CFR Part 542

Currently there are seven manufacturers who produce LDTs that could be subject to the parts-marking requirements. While NHTSA estimates that all seven are still active in the U.S. market, only manufacturers that introduce new LDT lines would be required to report to NHTSA under 49 CFR 542.1 and 49 CFR 542.2. On average, NHTSA estimates that approximately one LDT line will be introduced each year for which the manufacturer will need to submit information under § 542.1 and one LDT line will be introduced for which the

<sup>2</sup> See Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2020), available at [https://www.bls.gov/news.release/archives/ecec\\_06182020.pdf](https://www.bls.gov/news.release/archives/ecec_06182020.pdf) (accessed August 31, 2021).

<sup>3</sup> May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, *Assemblers and Fabricators, Occupation Code 51-2000*, <https://www.bls.gov/oes/2020/may/oessrci.htm> (accessed August 31, 2021).

<sup>4</sup> May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, *Compliance Officer, Occupation Code 13-1041*, [https://www.bls.gov/oes/2020/may/naics4\\_336100.htm#13-0000](https://www.bls.gov/oes/2020/may/naics4_336100.htm#13-0000) (accessed August 31, 2021).

manufacturer will need to submit information under § 541.2.

Section 542.1 specifies procedures for motor vehicle manufacturers and the agency to follow in the determination of new LDT lines that are likely to have a theft rate above or below the median theft rate of 3.5826. This section also provides the manufacturers with notice of their rights and responsibilities during the selection and appeals process. On average, NHTSA estimates that there will be approximately one manufacturer submittal a year. NHTSA further estimates that the burden for each § 542.1 submittal is approximately 45 hours. Therefore, the total annual burden for § 542.1 submittals is estimated to be 45 hours.

Section 542.2 specifies procedures for motor vehicle manufacturers and NHTSA to follow in the determination of new LTD lines that will likely have a low theft rate and have major parts interchangeable with a majority of the major parts of a passenger motor vehicle line subject to the parts-marking requirements. This section also provides the manufacturers with notice of their rights and responsibilities during the selection and appeal process. On average, NHTSA estimates that there will be approximately one manufacturer submittal a year. NHTSA further estimates that the burden for each § 542.2 submittal is approximately 45 hours. Therefore, the total annual burden for § 542.2 submittals is estimated to be 45 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 costs associated with developing and submitting 542 submissions using the average wage for compliance officers in the motor vehicle manufacturing industry (Standard Occupational Classification #13-1041), which BLS estimates to be \$42.30<sup>6</sup> per hour. Using this estimate, NHTSA estimates the total compensation costs per hour to be \$60.26 per hour (\$42.30 per hour ÷ 0.702). The labor cost to prepare each submission under part 542 is estimated to be \$2,712, rounded (\$60.26 × 45 hours per submission).

Table 1 below provides a summary of the estimated burden hours and Table 2 provides a summary of the labor costs associated with the burden hours.

**Table 1: Total Estimated Burden Hours for Parts 541 and 542**

IC No.	ICR Title	Type of IC	Estimated No. of Respondents	Estimated No. of Responses	Estimated Time per Response	Total Burden Hours
1	541: Parts-Marking on 14 major parts (49 CFR 541.5(a))	Third-Party Disclosure	21	4.5 million	2 minutes	<b>150,000 hours</b>
2	541: Reporting of Target	Reporting	21	23	20 hours	<b>460 hours</b>

<sup>5</sup> See Table 1. Employer Costs for Employee Compensation by ownership (Mar. 2020), available at [https://www.bls.gov/news.release/archives/ecec\\_06182020.pdf](https://www.bls.gov/news.release/archives/ecec_06182020.pdf) (accessed August 31, 2021).

<sup>6</sup> May 2020 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, *Compliance Officer, Occupation Code 13-1041*, [https://www.bls.gov/oes/2020/may/naics4\\_336100.htm#13-0000](https://www.bls.gov/oes/2020/may/naics4_336100.htm#13-0000) (accessed August 31, 2021).

	Areas to NHTSA					
3	Maintaining a Record of the Target Areas	Recordkeeping	21	21	0 hours	<b>0 hours</b>
4	542: Submissions for Determination of whether LDT Line is High Theft	Reporting	1	1	45 hours	<b>45 hours</b>
5	542: Submission for Determination of whether LDT line Shares Interchangeable Parts with High Theft Line	Reporting	1	1	45 hours	<b>45 hours</b>
Total						<b>150,550</b>

**Table 2: Estimated Labor Costs for Burden Hours**

ICR No.	ICR Title	Labor Cost per Hour	Time per Response	Labor Cost per Response	Total Burden Hours	Total Labor Cost
1	541: Parts-Marking on 14 major parts (49 CFR 541.5(a))	\$33.02	2 minutes	\$1.10	150,000 hours	<b>\$4,953,000</b>
2	541: Reporting of Target Areas to NHTSA	\$60.26	20 hours	\$1,205.20	460 hours	\$27,719.60 <b>\$27,720</b>
3	Maintaining a Record of the Target Areas	N/A	0 hours	N/A	0 hours	\$0
4	542: Submissions for Determination of whether LDT Line is High Theft	\$60.26	45 hours	\$2,711.70	45 hours	\$2,711.70 <b>\$2,712</b>
5	542: Submission for Determination of whether LDT line Shares Interchangeable Parts with High Theft Line	\$60.26	45 hours	\$2,711.70	45 hours	\$2,711.70 <b>\$2,712</b>
Totals:					150,550 hours	<b>\$4,986,144</b>

**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 assumes that most manufacturers will use the less expensive method of labeling the major parts on vehicles, and not stamp the VINs onto major parts, based on historical practice and the agency's current understanding of how manufacturers fit labeling into the vehicle assembly line. The cost of this collection of information will comprise of printing costs for the labels affixed to the vehicle parts. There are no additional costs to maintain the target area designation because maintaining the designation is built into the production process of a new vehicle line and the record of the target designation is kept electronically in the normal course of business. NHTSA estimates that the average cost to print each label is \$0.381. There are an average 14 parts per vehicle to label; therefore, the printing cost per vehicle is \$5.33. At present, the agency estimates that 4.5 million motor vehicles annually must have their major parts marked. The total annual fleet costs are estimated to be \$24,003,000 for label identifiers (\$5.33 x 4.5 million vehicles).

Information Collection	No. of Parts Labeled per Vehicle	Printing Cost per Label	Total Printing Cost per Vehicle	No. of Vehicles per Year	Total Estimated Printing Cost
541: Parts-Marking on 14 major parts (49 CFR 541.5(a))	14	\$0.381	\$5.33	4.5 million	\$24,003,000

Target area submissions require no additional costs to the respondents above and beyond the labor costs.

#### 49 CFR Parts 542.

NHTSA estimates that meeting Part 542 involves no additional costs to the respondents above and beyond 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.**

#### 49 CFR Parts 541 and 542

NHTSA records and maintains information on 49 CFR Parts 541 and 542. The annualized cost to the Federal Government to review the respondents' information for compliance, to analyze the information, to distribute reports to NHTSA users, and to control and to store the information is expected to take approximately 30% of one federal employee's time. To calculate the cost associated with this time, NHTSA used wage data for a GS-12, step 5

employee in the Washington, DC area. The annual salary of a GS-12-5 employee is \$101,813.<sup>7</sup> To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics' estimate that wages and salary only represent 62.0% of total employee compensation cost for State and local employees,<sup>8</sup> which brings the total annual cost for this employee's time to \$164,214.52. Therefore, NHTSA estimates the total annual cost to the Federal government for processing the information to be \$49,264.36 ( $\$164,214.52 \times .3$ ).

**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 the 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 of a previously approved information collection. It increases burden by 150,550 hours and \$24,003,000. However, during the previous submission the hours were 267,356, which now is a reduction of 116,806 hours from the previous submission. This reduction is due to the decreased number of vehicles requiring stamping (previously 8 million) and the number of target area submissions to be stamped (previously 30). The costs for printing have decreased by \$57,917,000 from the last OMB approval. Not only have the number of vehicles reduced by 3.5 million, but the previous approval included labor costs (burden hour costs) in the printing costs. The printing cost per label, \$5.33, has remained the same.

**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 intends to make information related to three of the information collections described in this notice available to the public. First, NHTSA intends to make the information about the target areas publicly available to aid law enforcement personnel in tracing stolen vehicles and their parts. Second, NHTSA will make information available regarding its determinations of whether new LDT lines are required to be parts-marked available. This information is intended to let law enforcement know which lines are subject to the parts-marking requirements.

**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 seeking approval to not display the expiration date for this collection because it is contained in a regulation and displaying the expiration date would require rulemaking.

<sup>7</sup> 2022 General Schedule salary rate with Washington DC locality pay: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf>. Accessed 03/24/2022.

<sup>8</sup> Employer Costs for Employee Compensation, [https://www.bls.gov/news.release/archives/ecec\\_03182022.pdf](https://www.bls.gov/news.release/archives/ecec_03182022.pdf). Accessed 03/24/22.

**18. Explain each exception to 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.