

Information Collection Request Supporting Statements: Part A
Consolidated Child Restraint System Registration for Defect notification and Labeling
OMB Control No. 2127-0576

Abstract:

This information collection request (ICR) is to seek approval from the Office of Management and Budget (OMB) for an extension of a currently approved information collection. This information collection is for mandatory disclosure requirements and recordkeeping for manufacturers of child restraint systems, and voluntary reporting for consumers. The provisions of the collection ensure that manufacturers of child restraint systems (CRSs): (1) produce registration cards, informational labels, and printed instructions (brochures), (2) collect CRS owner registration information and (3) create and keep registration records. The requirements of this collection apply to CRS manufacturers and voluntary reporting applies to consumers who purchase CRSs. This required collection supports the Department of Transportation's (DOT) strategic goal for safety, by working towards the elimination of transportation related deaths and injuries involving children.

CRS manufacturers are required to provide owner registration cards and to label their CRSs with a message informing the consumer/CRS owner of the importance of registering the CRS as well as with information necessary to allow subsequent owners to register the restraint. The CRS manufacturer is required to keep records of the consumer registration information by developing and maintaining a filing system which contains the owner's name and address along with identifying information for the CRS purchased by that consumer. Requiring the retention of this information ensures that the manufacturer is able to contact owners if the product they purchased is later subject to a safety recall, thus increasing the likelihood that safety recalls for CRSs will be remedied.

CRS manufacturers are also required to provide with all CRSs: (1) printed instructions with step-by-step information on how the restraint is to be used and (2) permanent labeling that gives "quick-look" information on whether the restraint meets the safety requirements, recommended installation and use, the child weight limit for using the lower anchors to attach the child restraint to the vehicle, and warnings against misuse. The provided instructions and labeling are to guide the consumer on how to properly install and use CRSs. Without proper use, the effectiveness of a CRS is greatly diminished.

NHTSA estimates the total burden of this information collection is 109,939 hours and \$8,781,987.85. The increase in reported burden for this collection is primarily due to updated CRS sales estimates. The agency previously estimated that approximately 14,500,000 CRSs were sold each year. In 2022, the agency estimates that 16,000,000 CRSs will be sold each year. Therefore, the burden increased from 99,330 hours to 109,939 burden hours (an increase of 10,609 hours) and the total cost increased from \$0 to \$8,781,987.85 due to the addition of printing and material costs as well as postage costs not accounted for in the previous submission.

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.**

The National Traffic and Motor Vehicle Safety Act authorizes the Secretary of Transportation (NHTSA by delegation), at 49 U.S.C. 30111, to issue Federal Motor Vehicle Safety Standards (FMVSS) that set performance standards for motor vehicles and items of motor vehicle equipment. Further, the Secretary (NHTSA by delegation) is authorized, at 49 U.S.C. 30117, to require manufacturers to provide information to first purchasers of motor vehicles or motor vehicle equipment when the vehicle or equipment is purchased, in a printed matter placed in the vehicle or attached to or accompanying the equipment.

Using this authority, the agency issued the initial FMVSS No. 213; “Child restraint systems,” in 1971. Child restraint systems (CRSs) are devices used for protecting infants and young children in motor vehicle or aircraft crashes. The standard requires CRSs to be labeled with safety information and requires the devices to be accompanied by printed instructions. Instructions for built-in CRS systems on the installation and use of the CRS are to be printed in the vehicle’s owner’s manual, which is included in OMB Clearance Number 2127-0541.

This information collection “Consolidated Child Restraint System Labeling and Registration for Defect Notification” (OMB Control Number: 2127-0576) ensures that CRS manufacturers: (1) produce registration cards, labels and brochures with each CRS, (2) collect CRS owner registration information, and (3) create and keep registration records. CRS manufacturers are required to label each CRS and provide printed

instructions with safety information and instructions on the proper use of the restraint. Such information would mitigate the risk of misuse and consequently reduce injuries and fatalities of children in crashes. The owner registration information is collected and maintained by the manufacturers so that, in the event of a safety recall, a CRS manufacturer can provide direct notification to owners. This collection supports the Department of Transportation's (DOT) strategic goal in safety, by working towards the elimination of transportation related deaths and injuries involving children.

FMVSS No. 213 requires manufacturers of CRSs to register the owners of CRSs so that the owners may be directly contacted in the event of a recall campaign. The standard requires:

- (a) A two-part perforated registration card. The first part contains a message and suitable instructions to be retained by the purchaser. The second part is to be returned to the manufacturer by the purchaser. The second part includes prepaid return postage, pre-printed name/address of the manufacturer, pre-printed model name/number and date of manufacture, and spaces for the purchaser to provide purchaser's name and address;
- (b) A permanently attached label on the CRS which includes a statement providing mailing and telephone instructions (or, at the option of the manufacturer, a toll-free hotline telephone number) for non-original owner registration and for re-registration, and the U.S. Department of Transportation's Auto Safety toll-free hotline number for reporting and receiving safety-related information about the CRS; and
- (c) A filing system containing CRS owners' names and addresses maintained by the CRS manufacturer suitable for easy access in the event of a recall campaign. The registration records are to be maintained by the manufacturer for no less than 6 years¹.

FMVSS No. 213 permits information regarding online product registration to be included on the owner registration form required under the standard. This enhances the opportunity of restraint owners to register their CRSs online, which may increase registration rates and the effectiveness of recall campaigns. Manufacturers are also permitted to supplement (but not replace) recall notification via first-class mail with email notification, which increases the likelihood that owners learn of a recall.

¹ CFR-Title 49, Subtitle B, Chapter V, Part 588 – Child Restraint Systems Recordkeeping Requirements. - CHILD RESTRAINT SYSTEMS RECORDKEEPING REQUIREMENTS. Link: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-V/part-588>

Manufacturers are also required to include a U.S. telephone number on a CRS label for the purpose of enabling consumers to register their products by telephone.

Increasing CRS registrations is an important part to protecting young children and infants. By registering CRSs, product manufacturers will be able to directly contact owners in the event of any safety recalls. Chapter 301 of Title 49 of the U.S. Code provides that if either NHTSA or a manufacturer determines that a motor vehicle or item of motor vehicle equipment contains a defect that relates to motor vehicle safety or fails to comply with an applicable FMVSS, the manufacturer must notify owners and purchasers of the defect or noncompliance and must provide a remedy without charge.² Pursuant to 49 CFR Part 577, “Defect and noncompliance notification,” for equipment items, including CRSs, notices must be sent “by first class mail to the most recent purchaser known to the manufacturer.”

FMVSS No. 213 requires each CRS to be permanently labeled with the following information:

1. Manufacturer’s name (or distributor’s name if the distributor assumes responsibility for all duties imposed on the manufacturer), model, manufacture date and place, and a statement that the CRSs conforms to all applicable FMVSSs.
2. A warning label with the following:
 - a. A statement that infants be restrained in rear-facing CRSs for rear-facing CRSs designed for infants only or for seats designed to change from a rear-facing seat to a forward-facing seat.
 - b. A statement with weight and height ranges of children who can safely occupy the CRS.
 - c. For CRSs that are equipped with belts to restrain children, a statement to snugly adjust belts to restrain the child.
 - d. For CRSs equipped with a tether strap, the statement to secure the tether strap.
 - e. For booster seats, a statement on using the vehicle’s lap or lap/shoulder belt restraint, as appropriate, for securing the child.
 - f. A maximum allowable child weight for which the lower anchorages may be used to install the CRS to the vehicle seat.
 - g. A statement to follow all instructions on the CRS and the written instructions provided in the CRS user’s manual.
 - h. A statement to register the CRS with the manufacturer.

² 49 U.S.C. §§ 30118, 30119, 30120, and 30166.

3. A warning label on rear facing CRSs to warn parents against using the restraint in any vehicle position equipped with an air bag.
4. An installation diagram showing the CRSs installed using a vehicle's 1) lap/shoulder belt, 2) lap belt, and 3) child restraint anchorage system.
5. FMVSS No. 213 requires printed installation instructions that provide a step-by-step procedure including diagrams, for installing the CRS in motor vehicles, securing the system in the vehicle, positioning the child in the system, and adjusting the system to fit the child. The installation instructions should include installation using the vehicle's seat belts and child restraint anchorage systems.

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

The requirements of this collection apply to CRS manufacturers and voluntary reporting by CRSs owners. The provisions of the collection ensure that CRS manufacturers: (1) produce registration cards, labels, and printed instructions, (2) collect CRS owner registration information and (3) create and keep registration records. CRS manufacturers use the owner registration information to provide direct notification to owners in the event of a safety recall.

Each manufacturer of CRSs must label each system and provide printed instructions with safety information and instructions on using the restraint. If such information is not provided, the consumer would not know how to properly install and use the CRSs – such as not to use it in front of an air bag or that lower anchors of a child restraint anchorage system may be used to install a CRS when the weight of the child is equal to or less than the specified weight – which could result in increased injuries and fatalities of young children and infants in automobiles and aircraft crashes. Without proper use, the effectiveness of these systems is greatly diminished. A permanently attached label gives quick-look information on whether the restraint meets the safety requirements, the recommended installation and use, and warnings against misuse. The manufacturer is also required to provide printed instructions containing step-by-step information on how the restraint is to be installed and used

In collecting owner registrations, a CRS manufacturer receives registration information from the card attached to each CRS device, from the internet (for those manufacturers that allow electronic registration), via telephone or from a substitute form sent to the

owner by NHTSA. The standard requires the manufacturers to provide owner registration cards and to label their CRSs with a message informing users of the importance of registering the restraint, as well as with information necessary to allow subsequent owners to register the restraint. It also requires manufacturers to develop and maintain a filing system that contains the owner's name and address that shall be in a form suitable for inspection such as computer information storage devices or card files.³ Requiring the retention of the owner information is important because it ensures that the manufacturer is able to contact owners that have registered their products if the product is later subject to a safety recall. This increases the likelihood that owners will learn of the safety recalls and remedy the safety problems with their CRSs.

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.

Optionally, CRS manufacturers are permitted to add to the registration form: (a) Specified statements informing CRS owners that they may register online; (b) the Internet address for registering with the company; (c) revisions to statements reflecting use of the Internet to register; and (d) a space for the consumer's email address. CRS owners with access to the Internet, may prefer online registration.

For those owners who obtain a substitute CRS registration form, an electronic means is available for downloading the form from NHTSA's Website or consumers can request the form by calling the DOT's Auto Safety Hotline.

NHTSA expects that the production of CRS labels involves automated production techniques. However, the information collection requires that CRS manufacturers affix paper labels to their products. NHTSA believes that affixing labels does not involve the use of technological collection techniques.

Computer-based filing systems are currently being used by most CRS manufacturers in keeping CRS registration records. Maintaining owner's registration information via an electronic database system seems to be the lowest cost viable method to have information available to be used in contacting CRS owners in case of a need to impart safety

³ CFR-Title 49, Subtitle B, Chapter V, Part 588 – Child Restraint Systems Recordkeeping Requirements. - CHILD RESTRAINT SYSTEMS RECORDKEEPING REQUIREMENTS. Link: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-V/part-588>

information to CRS owners or to contact them in case of a recall. Manufacturers are required to maintain a file system of their choice for this information, but the standard does not require the use of electronic records.

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

NHTSA is the only Federal agency regulating CRSs. Only this agency requires manufacturers of CRSs to label them, provide printed instructions, or to collect registration information covering names and contact information of CRS owners. Note that CRSs that also function as hand-held infant carriers are required by the Consumer Product Safety Commission to have markings, labeling, and instructions on the proper use of the infant carrier and warnings intended to alert the caregiver of strangulation, fall, and suffocation hazards. No other similar information is available. Each CRS model is different and requires its own installation and use instructions. Each user of a CRS needs such information.

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

This regulation applies to all manufacturers of CRSs. In total, there are currently 38 manufacturers producing CRSs, none of which are considered small business entities.⁴ Information that must be provided in labeling in order to comply with the standard is minimal and takes an estimated 2 seconds to determine as the CRS has to be paired with a set of labeling designs and it is done with automated methods. NHTSA has minimized the burden on CRS manufacturers by allowing them to place information on the registration card for purchasers to complete their product registrations via the internet. By registering over the internet, an electronic record is created without the manufacturer having to manually compile a record for each CRS. Similarly, if a defect or compliance problem exists with a CRS, the manufacturer is able to search its records more efficiently to locate and contact consumers owning the same model of the defective seating system. No other effective easy means has been found to minimize the burden in any other area.

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.

⁴ According to the Small Business Administration (SBA) database listed at http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm.

If the information is not collected, there is no assurance that CRS owners will be given proper usage information. The information currently provided on and with the CRS includes instructions on how to correctly use the CRS, as well as recommendations on which children are suitable for the CRS. Without this information, the effectiveness of the CRS could be greatly diminished, and the agency's mission to save lives and prevent injuries would also be diminished.

The CRS registration information enables manufacturers to directly contact CRS owners to notify them of safety recalls. This better ensures that owners will learn about a recall and can remedy their systems' safety problem. Manufacturers must retain the owner registration records for 6 years, because NHTSA's records indicate that if a CRS is recalled, it is generally recalled within a 6-year period from the production date of the CRS.

- 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.**

Manufacturers are required to retain the owner registration records for more than 3 years, because NHTSA's records indicate that, if a CRS is recalled, it is generally recalled within a 6-year period from the production date of the CRS. CRS manufacturers use the

owner registration information to provide direct notification to owners in the event of a safety recall and it is an important part for protecting young children and infants.

- 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 60-Day Notice was published in the Federal Register on July 26, 2022 (87 FR 44494). The closing date for comments was September 26, 2022. One comment from the National Association of Mutual Insurance Companies (NAMIC) was received supporting this information collection. The 30-Day Notice appeared in the Federal Register September 30, 2022 (87 FR 59490) with a deadline for comments on October 31, 2022.

- 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.

- 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.**

The information collection requirements for CRS manufacturers are for disclosure or retention of information. Therefore, they do not involve any assurances of confidentiality provided to respondents.

In regard to the collection of registration information from owners of CRS, NHTSA provides a substitute registration form (NHTSA 1053A) on its website, which consumers can use to send their CRS registration to NHTSA for forwarding to the manufacturer. The substitute form is provided with the goal of increasing the number of CRS consumers that may be contacted in case of a recall to remedy a defect, in line with NHTSA's mission to save lives, prevent injuries, and reduce vehicle-related crashes. NHTSA forwards the forms that are submitted to the appropriate manufacturer. The substitute registration form provided by NHTSA has a statement authorizing the agency to provide the CRS registration information to the manufacturer. If written authorization is not provided, the personal identification information is not provided to the manufacturer. This substitute

registration form requests personally identifiable information and includes a form that requires a Privacy Act Statement.

A Privacy Threshold Assessment (PTA)⁵ and a Privacy Impact Assessment (PIA)⁶ is required because the substitute registration form contains personally identifiable information (PII) on members of the public.

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.

The required labeling and printed instructions regard the use of CRSs and does not include information that might be considered sensitive or private. The registration information requests PII, which is addressed in Question 10.

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.

NHTSA estimates that the total burden hours of the collection of information for FMVSS No. 213 is 109,939 hours. The total burden hours for this collection consist of the time spent by consumers filling out the registration form (47,253 hours), time spent collecting registration information (59,242 hours) and time spent determining the maximum allowable child weight for lower anchor use coupled with adding the information to the existing labels and printed instructions (3,444 hours).

The total estimated hour burden increased from the 99,330 hours to 109,939 burden hours (10,609 burden hours increase). The increase in burden is due to an increase in CRS sales. The agency previously estimated an annual sales volume of 14,500,000 CRSs (including booster seats). An estimated 10,150,000 of that previous total are CRSs equipped with an internal harness. In 2022, the agency estimates that 16,000,000 CRSs (including booster seats) are sold each year and 12,400,000 of these are CRSs equipped with an internal harness. The total labor cost increased from \$2,351,385 to \$4,224,914 (\$1,873,530 cost increase). The number of respondents has also been updated from 29 to

⁵ Adjudicated November 4, 2021.

⁶ Published February 6, 2019. Link: <https://www.transportation.gov/individuals/privacy/child-restraint-system-crs-registration-collection-february-6-2019>

38 CRS manufacturers and from 2,569,400 to 2,835,200 CRS owners, who are expected to return registration information.⁷

The breakdown of burden hours is shown below:

(1) Annual Burden for filling out registration card

Approximately 16,000,000 CRSs are sold each year with an estimated registration rate of 17.72% (2,835,200). NHTSA estimates that each consumer spends, on average, 60 seconds filling out the registration form. The estimated annual number of burden hours for consumers to fill out the registration form is 47,253 hours (2,835,200 Registration Cards × (60 seconds ÷ 3,600 seconds/hour)).

The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for all employees in private non-farm industries is \$31.01⁸. The BLS estimates that private industry worker’s wages represent 70.5% of total labor compensation costs.⁹ Therefore, NHTSA estimates the hourly opportunity costs to be \$43.99. Total annual opportunity costs to fill in the registration form is estimated by multiplying 47,253 hours by \$43.99 an hour which equals \$2,078,476.41 and averages \$0.73 per consumer.

Annual Burden for filling out registration card					
Number of CRS Produced Each Year	Annual Number of Consumer Respondents (Registration Rate of 17.72%)	Time to Fill Out Registration Card	Total Annual Burden Hours	NHTSA Estimated Hourly Opportunity Cost	Total Annual Opportunity Cost
16,000,000	2,835,200	1 minute	47,253	\$43.99	\$2,078,476.41

(2) Annual Burden for Reporting (collecting registration information)

Approximately 16,000,000 CRSs are sold each year with an estimated registration rate of 17.72% (2,835,200). Of the total registrations received, 83.58% (2,369,660) are from

⁷ Number of respondents update made per 2021 market research: <https://www.healthychildren.org/English/safety-prevention/on-the-go/Pages/Car-Safety-Seats-Product-Listing.aspx>

⁸ According to the Bureau of Labor Statistics as of October 2021. <https://www.bls.gov/news.release/empsit.t19.htm>

⁹ See Table 1. Employer Costs for Employee Compensation by ownership (December. 2021), available at <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed April 26, 20222022).

registration cards and 16.42% (465,540) are from online registrations. Manufacturers must spend 90 seconds to enter the information from each returned registration card; while, online registrations are considered to have no burden for the manufacturer, as the information is entered by the purchaser. Given these estimates, the estimated total annual number of burden hours for this collection of information is 59,242 hours (16,000,000 CRSs * 17.72% * 83.58% * (90 seconds per registration card / 3,600 seconds/hour)), which averages to 1,559 hours per manufacturer per year (59,242 ÷ 38).

The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for production and non-supervisory employees in the manufacturing industry is \$24.14¹⁰. The BLS estimates that private industry worker’s wages represent 70.5% of total labor compensation costs.¹¹ Therefore, NHTSA estimates the hourly labor costs to be \$34.24. Total annual labor costs to enter the information from each returned registration card is estimated by multiplying 59,242 hours by \$34.24 an hour which equals \$2,028,496.32, and averages \$53,381.48 per manufacturer (\$2,028,496.32 ÷ 38).

Annual Burden for Reporting (collecting registration information)						
Number of CRS Produced Each Year	Annual Number of Returned CRS Registrations (Registration Rate of 17.72%)	Registrations Received from Registration Cards (83.58%)*	Time to Collect Each Returned Registration (sec)	Total Annual Burden Hours	Estimated Hourly Labor Cost	Total Annual Labor Cost
16,000,000	2,835,200	2,369,660	90	59,242	\$34.24	\$2,028,496.32

* By registration card. Internet registrations are considered to have no burden.

(3) Annual Burden for Disclosure (maximum allowable child weight information)

Approximately 16,000,000 CRSs (including booster seats) are sold each year, where 12,400,000 of them are CRSs equipped with an internal harness. About half (50%) of the CRSs equipped with an internal harness would require the label with the maximum allowable child weight for using the lower anchors information (6,200,000). The child

¹⁰ According to the Bureau of Labor Statistics as of October 2021.

<https://www.bls.gov/news.release/empsit.t24.htm>

¹¹ See Table 1. Employer Costs for Employee Compensation by ownership (December, 2021), available at <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed April 26, 2022).

weight limit depends upon the weight of the CRS. Manufacturers must determine the maximum allowable child weight for lower anchors use and spend 2 seconds to add that information to the existing label and printed instructions in an automated process. Given these estimates, the estimated total additional annual burden hours for this label information is 3,444 hours (12,400,000 CRSs * 50% * (2 seconds / 3,600 seconds/hour)), and averages 90.63 hours per manufacturer.

The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for production and non-supervisory employees in the manufacturing industry is \$24.14¹². The BLS estimates that private industry worker’s wages represent 70.5% of total labor compensation costs.¹³ Therefore, NHTSA estimates the hourly labor costs to be \$34.24. Total annual labor costs associated with adding the information as to the maximum allowable child weight for lower anchor use is estimated to be \$117,941.69 (3,444 hours * \$34.24 per hour), and averages \$3,103.73 per manufacturer.

Annual Burden for Disclosure (maximum allowable child weight information)						
Number of CRS Produced Each Year	Number CRSs Equipped with Internal Harness Produced Each Year	Applicable Label to 50% of CRSs Equipped with Harness	Time to Determine Allowable Child Weight for Lower Anchorage Use (seconds)	Total Annual Burden Hours	Estimated Hourly Labor Cost	Total Annual Labor Cost
16,000,000	12,400,000	6,200,000	2	3,444	\$34.24	\$117,941.69

The estimated total annual burden hours for this information collection are 109,939 hours (47,253 hours + 59,242 hours + 3,444 hours) and the total labor cost is \$4,224,914 (rounded) (\$2,078,476.41 + \$2,028,496.32 + \$117,941.69).

Summary of total annual burden hours for the information collection		
	Total Annual Burden	Total Annual

¹² According to the Bureau of Labor Statistics as of October 2021. <https://www.bls.gov/news.release/empsit.t24.htm>

¹³ See Table 1. Employer Costs for Employee Compensation by ownership (December 2021), available at <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed April 26, 2022).

	Hours	Opportunity Cost
Annual Burden for filling out registration card	47,253	\$2,078,476.41
Annual Burden for Reporting (collecting registration information)	59,242	\$2,028,496.32
Annual Burden for Disclosure (maximum allowable child weight information)	3,444	\$117,941.69
Total	109,939	\$4,224,914 (rounded)

The burden of designing labels and printed instruction is minimal. CRS Manufacturers use templates to include in their CRSs. The design of the basic label design is adjusted with necessary changes based on the different models. Specific CRS labels can readily be created through editing of text and insertion of updated diagrams. Therefore, there is no new annualized burden associated with label and instruction development.

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 the only cost associated with this ICR, other than labor or opportunity costs associated with burden hours, is the cost for printing registration cards and labeling and the cost of postage for the mailed registration cards.

The total annual printing and material cost to the respondents is estimated to be \$8,000,000. NHTSA estimates that the printing and material cost of \$0.20 per CRS labels and printing instructions and \$0.30 per CRS registration card. The total annual cost to respondents is calculated by multiplying the printing and material cost of \$0.50 (\$0.20 for labels+\$0.30 for registration card) by the estimated 16,000,000 responses (CRSs produced) per year ($\$0.50 * 16,000,000$). The total estimated printing and material cost are detailed in the table below:

Annual Printing and Material Costs			
No. of CRS Produced	Printing and Material Cost	Printing and Material Cost per CRS -	Annual Printing and Material Cost

Annually	per CRS – Labels and Instructions	Registration Card	
16,000,000	\$0.20	\$0.30	\$8,000,000.00

The total annual postage cost for the mailed in registration cards is estimated to be \$781,987.85. Approximately, 16,000,000 CRSs are sold each year with an estimated registration rate of 17.72% (2,835,200). Of the total registrations received, 83.58% (2,369,660) are from mailed in registration cards. The rests are from online registrations. CRS manufacturers are required to provide printed mail-in registration cards with pre-paid postage. The total annual postage cost is calculated by multiplying the number of mailed in registration cards (2,349,660) by the commercial postcard postage cost (\$0.33).¹⁴ The total estimated annual mailed-in registration card postage cost is detailed in the table below:

Annual Postage Costs (Mailed-in Registration Cards)				
Number of CRS Produced Each Year	Annual Number of Returned CRS Registrations (Registration Rate of 17.72%)	Registrations Received from Registration Cards (83.58%)*	Registration Card Postage Cost	Annual Postage Cost
16,000,000	2,835,200	2,369,660	\$0.33	\$781,987.85

¹⁴ United States Postal Service Rates: https://pe.usps.com/text/dmm300/Notice123.htm#_c096

The estimated total annual cost burden is \$8,781,987.85. The total annual cost burden is calculated by adding the annual printing and material costs (\$8,000,000) and the mailed-in registration card postage cost (\$781,987.85).

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 only costs to the Federal government associated with this ICR are the costs associated with processing registration cards submitted by owners of CRS to NHTSA. The estimated cost to the Federal government associated with processing the form available on the NHTSA website, and emailing the form to the appropriate manufacturer consists of (1) processing the received forms and (2) process management.

(1) Cost of Processing Forms

The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for production and non-supervisory employees in private non-farm industries (private service-providing) is \$25.03¹⁵ per hour. The BLS estimates that private industry worker's wages represent 70.5% of total labor compensation costs.¹⁶ NHTSA receives 1,500 forms per year and takes 2 minutes to process each form (receiving and sending to manufacturer). The estimated processing costs is \$1,775.18 (1,500 forms * (2/60 hours to process form) * (\$25.03/0.705 labor cost per hour)).

(2) Process Management

The General Schedule Pay Scale estimates that the average hourly wage for a manager is \$71.14 (\$148,484¹⁷ yearly salary/2,087 number of work hours in a year) per hour. NHTSA spends 48 hours per year managing the registration card process. The estimated management cost is \$3,415 (48 hours*\$71.14 hourly wage).

The estimated total cost to the Federal government is \$5,190.18 (\$1,775.18 processing costs + \$3,415 management costs).

¹⁵ October 2021: <https://www.bls.gov/news.release/empsit.t24.htm>

¹⁶ See Table 1. Employer Costs for Employee Compensation by ownership (Dec. 2021), available at https://www.bls.gov/news.release/archives/ecec_03182022.pdf (accessed March 24, 2022).

¹⁷ GS-Pay Scale GS15 (D.C. Locality) Step 1: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf>

- 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.**

The agency previously estimated that approximately 14,500,000 CRSs were sold each year by 29 manufacturers. In 2022, the agency estimates that 16,000,000 CRSs will be sold each year by 38 manufacturers. The total estimated hour burden and cost is dependent on the number of CRSs sold and the estimated registration rate of registration cards. Due to the increase in CRS sales and the addition of printing and material costs as well as postage costs not accounted for in previous submissions, the total estimated hour burden increased from 99,330 hours to 109,939 burden hours (a 10,609 burden hour increase) and the total annual cost increased from \$0 to \$8,781,987.85 (a \$8,781,987.85 cost increase).

- 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 collected data from registration cards will not be published, but is used by manufacturers of CRSs for notifying consumers in case of recalls. The information required on labels and in printed instructions involves only public disclosure, and this information is not being collected by NHTSA. There is also no reason to publish this information because it is provided by the CRS manufacturers directly to consumers when they purchase the respondent's merchandise.

- 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. The information collection for labeling of CRSs and maintaining files of information on owners of CRSs are found in FMVSS No. 213. NHTSA seeking approval not to display the expiration date because doing so would require rulemaking.

- 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 exception is made to any of the items in the certification statement.