

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

**SUPPORTING STATEMENT**

**Commercial Motor Vehicle Marking Requirements**

**SUMMARY**

- This is a request for approval for the renewal of a currently approved information collection request.
- The annual burden hours are **7,196,938** hours. See section 12 for the burden hour calculation and section 15 for details on the increase in burden hours.
- The total average annual wage-related burden hour cost to respondents is estimated as **\$313,624,242**, as seen in section 12. The total annual cost burden to respondents is estimated as **\$130,495,717**, as seen in section 13.
- For clarification, intrastate hazmat carriers are accounted for separately from freight-carrying carriers and presented as a separate IC, therefore there are now four ICs as follows:  
IC1: Freight-carrying Commercial Motor Carriers;  
IC2: Intrastate Hazardous Materials Transporting Motor Carriers;  
IC3: Passenger-carrying Commercial Motor Carriers; and  
IC4: Intermodal Equipment Providers (IEPs).

**INTRODUCTION**

Federal Motor Carrier Safety Administration (FMCSA) vehicle marking regulations in 49 CFR part 390 require freight-carrying motor carriers, intrastate hazardous materials transporting motor carriers, passenger-carrying motor carriers, and intermodal equipment providers (IEPs) engaging in interstate transportation to display certain information on their vehicles or equipment. These vehicle marking regulations are an information disclosure requirement that constitute a collection of information under the Paperwork Reduction Act (PRA), and for which the Agency has in place a currently approved collection of information with Office of Management and Budget (OMB) Control Number 2126-0054 titled “Commercial Motor Vehicle Marking Requirements” which was most recently approved on October 18, 2019, and which has an expiration date of October 31, 2022.

**Part A. Justification**

## 1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The USDOT number is used to identify all motor carriers in FMCSA's registration and information systems. It is also used by States as the key identifier in the Performance and Registration Information Systems Management (PRISM) system, a cooperative Federal/State program that makes motor carrier safety a requirement for obtaining and maintaining commercial motor vehicle (CMV) registration and privileges.

FMCSA has authority to require motor carriers to conduct recordkeeping, reporting, and disclosure of information (see 49 U.S.C. 31133(a)(8) or 31133(a)(10)) (Attachment D).

### 49 U.S.C. 31133. **General powers of the Secretary of Transportation**

(a) GENERAL.—In carrying out this subchapter and regulations prescribed under section 31102 of this title, the Secretary of Transportation may—

\* \* \*

(8) prescribe recordkeeping and reporting requirements;

\* \* \*; and

(10) perform other acts the Secretary considers appropriate.

Vehicle marking requirements are intended to ensure that FMCSA, the National Transportation Safety Board (NTSB), and State safety officials are able to identify motor carriers and correctly assign responsibility for regulatory violations during inspections, investigations, compliance reviews, and crash studies. These marking requirements will also provide the public with beneficial information that could also assist in identifying carriers for the purposes of commerce, complaints, or emergency notification.

The burden for the CMV marking requirement was initially documented in the final rule titled, “Federal Motor Carrier Safety Regulations: General Commercial Motor Vehicle Marking,” (65 FR 35287), June 2, 2000.<sup>1</sup>

This information collection (IC) supports the DOT strategic goals of safety and organizational excellence.

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<sup>1</sup> U.S. Department of Transportation (USDOT), Federal Motor Carrier Safety Administration (FMCSA). “Federal Motor Carrier Safety Regulations; General; Commercial Motor Vehicle Marking. Final Rule.” 65 FR 35287. June 2, 2000.

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

The marking requirements apply to freight-carrying motor carriers, intrastate hazardous materials transporting motor carriers, passenger-carrying motor carriers, and intermodal equipment providers (IEPs) engaging in interstate transportation. The Agency provides performance-based requirements for the marking but does not require a specific method of marking as long as the method complies with FMCSA's performance-based requirements. These requirements ensure that FMCSA, NTSB, and the States are able to identify motor carriers and correctly assign responsibility for regulatory violations during inspections, investigations, compliance reviews, and crash studies. These requirements also provide the public with beneficial information that could assist in identifying carriers for the purposes of commerce, complaints, or emergency notification.

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

IEPs may choose to meet the marking requirements of 49 CFR 390.21(h) for intermodal equipment (IME) by entering and maintaining equipment identification information in the Intermodal Association of North America (IANA), Global Intermodal Equipment Registry (GIER).<sup>2</sup> This is in lieu of physically marking intermodal equipment with stencils or labels. Registering intermodal equipment in the GIER is optional and discretionary on the part of IEPs, and IEPs can choose to do so to the extent that they find it the least burdensome way to meet the marking requirements. This electronic alternative reduces the information collection burden of the vehicle marking regulations because physical marking of the equipment with the IEP name and USDOT number using stencils or labels need not be performed.

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

There are no other Federal agencies that require CMV marking.

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

The marking requirements impose minimal burden on small businesses. Considerable flexibility is afforded in meeting the requirements. Marking may be painted on the vehicles, applied with stencils, applied with decals, or affixed by any other means, provided that the marking meets the performance-based requirements. Furthermore, for IME, in lieu of physical marking the marking requirements may instead be met by entering and maintaining equipment identification information in the GIER.

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<sup>2</sup> Intermodal Association of North America (IANA). "Global Intermodal Equipment Registry (GIER)". Available at: <https://www.gierregistry.com/> (accessed June 8, 2022).

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

The appropriate marking of vehicles owned, leased, or rented, assists FMCSA in identifying motor carriers and monitoring their safety performance and crash involvement, thereby helping the Agency identify unsafe, high-risk motor carriers. This ICR also greatly assists FMCSA and its State partners in meeting the standard burden of proof for enforcement actions against non-compliant carriers, as well as assists State partners during accident investigations in determining the responsible motor carrier involved in a CMV crash. The frequency of vehicle marking is a function of the rate at which new vehicles are acquired that require initial marking, the rate at which existing vehicles are resold and must be re-identified, and the rate at which labels reach the end of their useful life and must be replaced, and therefore changes to frequency of marking would not directly result from any changes to this ICR. If this ICR were not conducted, the Agency's vehicle marking requirements could not be met, and FMCSA, NTSB, and the States would not be able to identify motor carriers and correctly assign responsibility for regulatory violations during inspections, investigations, compliance reviews, and crash studies. Also, the public would not be able to as easily identify carriers for the purposes of commerce, complaints, or emergency notification.

## **7. SPECIAL CIRCUMSTANCES**

There are no special circumstances associated with this ICR.

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

The 60-day Federal Register notice (87 FR 45146) published on July 27, 2022, announced FMCSA's intent to submit Commercial Motor Vehicle Marking Requirements clearance process to OMB for approval and requested comments from the public for 60 days. The FMCSA received 1 comment in response to the 60-day Federal Register notice. This comment was in support of vehicle markings and discussed the importance of correctly identifying the current operating carrier for a vehicle. Per the commenter, it is "[v]ery important for highway safety and accountability to hold carriers to a certain regulatory and safety standard. We already have too many carriers/owners trying to circumvent the regulations on a daily basis."

The 30-day Federal Register notice (87 FR 63851) published on October 20, 2022.

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

No payments or gifts are provided.

## **10. ASSURANCE OF CONFIDENTIALITY**

There are no confidential reporting requirements associated with this information collection. The requirement is limited to marking vehicles operated in interstate commerce with an FMCSA-furnished USDOT registration number.

## 11. JUSTIFICATION FOR COLLECTION OF SENSITIVE INFORMATION

The information requested and collected is not of a sensitive nature.

## 12. ESTIMATE OF BURDEN HOURS FOR INFORMATION REQUESTED

The estimate of burden hours is primarily dependent on the type of entity (freight-carrying carrier, hazardous materials (HM) carrier, passenger-carrying carrier, or intermodal equipment provider), and the type of marking (physical, or in the case of intermodal equipment providers, electronic). Each of the four distinct types of motor carriers are addressed separately below. **Figures may differ slightly due to rounding.**

### IC 1: Freight-carrying commercial motor carriers (i.e., trucking companies)

FMCSA's Motor Carrier Management Information System (MCMIS) and Safety Measurement System (SMS) data indicate that there are **711,036** interstate freight-carrying motor carriers operating approximately **23,268,822** power units as of a February 25, 2022, snapshot, and **1,149,090** intrastate freight-carrying motor carriers operating approximately **1,197,439** power units as of a June 24, 2022, snapshot. These are non-hazmat intrastate freight-carrying motor carriers. For clarification purposes, the HM intrastate carriers are presented separately as IC-2.

The U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) published a report in 1994 which suggests that the average operational life of a heavy-duty CMV was 14.7 years.<sup>1</sup> Therefore, the Agency assumes that each freight-carrying CMV is replaced by a newly acquired vehicle every 14.7 years.

In addition, because of the absence of more reliable data on the sale and resale of used freight carrying CMVs, for purposes of this analysis and to simplify calculations the Agency assumes that the average turnover of freight-carrying vehicles is once every 3 years. The implication of this assumption is that on an annual basis, one-third of freight-carrying CMVs, less newly-acquired freight-carrying CMVs, are estimated to be resold in a secondary market and undergo re-identification.

Finally, FMCSA estimates that the average life of a weatherproof vinyl label is 7.35 years. Without authoritative information on the average useful life of labeling used on freight-carrying CMVs, the Agency uses this value of 7.35 years as an estimate of the average useful life of labels on freight-carrying CMVs.

With these assumptions in mind, the Agency estimates the following for freight-carrying CMVs:

- The annual number of newly-acquired interstate freight-carrying CMVs is **1,582,913** (23,268,822 power units ÷ 14.7 years average operational life), and the annual

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<sup>1</sup> U.S. Department of Transportation (DOT), National Highway Traffic Safety Administration (NHTSA). "A Study of Commercial Motor Vehicle Electronics-Based Rear and Side Object Detection Systems. Final Report." DOT HS 808 080. January 1994. Available at: [https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/dot\\_hs\\_808\\_080.pdf](https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/dot_hs_808_080.pdf) (accessed June 27, 2022).

- number of intrastate freight-carrying CMVs is **81,458** (1,197,439 power units ÷ 14.7 years average operational life).
- The annual number of resold interstate freight-carrying CMVs which require re-identification is estimated to be **7,228,636** ([23,268,822 power units – 1,582,913 newly acquired power units] ÷ 3 years average turnover rate), and the annual number of resold intrastate freight-carrying CMVs which require re-identification is estimated to be **371,994** ([1,197,439 power units – 81,458 newly acquired power units] ÷ 3 years average turnover rate).
  - The annual number of interstate freight-carrying CMVs retained by the owner and that undergo relabeling due to the label reaching the end of its useful life is **1,966,976** ([23,268,822 power units – 1,582,913 newly acquired power units – 7,228,636 resold and relabeled power units] ÷ 7.35 years average label useful life). The annual number of intrastate freight-carrying CMVs retained by the owner and that undergo relabeling due to the label reaching the end of its useful life is **101,223** ([1,197,439 power units – 81,458 newly acquired power units – 371,994 resold and relabeled power units] ÷ 7.35 years average label useful life).

This results in an annual estimate of **10,778,525** interstate freight-carrying CMVs (1,582,913+7,228,636+1,966,976) and **554,675** intrastate freight-carrying CMVs (81,458+371,994+101,223) impacted by the marking requirements.

The estimated average time for affixing a USDOT number (assuming an average of 7 digits) is 12 minutes (0.20 hours), and the estimated average time for affixing a carrier name (assuming an average of 21 alphanumeric characters) is 14 minutes (0.233 hours). These estimates incorporate a number of factors that vary, including marking via stencils versus decals, amount of cleaning required, weather, and whether a new or existing vehicle is being marked. These estimates are based on responses to the Federal Highway Administration (FHWA, the predecessor organization to the FMCSA) from interviews with metropolitan Washington, DC, signage companies and Agency employees formerly employed by the motor carrier industry, which were undertaken during the original rulemaking process. This rule was published June 3, 2000.<sup>2</sup> The combined total average time for affixing both a USDOT number and a carrier name is 26 minutes (0.433 hours).

Given the above estimate of 26 minutes (0.433 hours) per vehicle for the total average time for affixing both a USDOT number and a carrier name, the estimated total annual burden hours is **4,667,101** (10,778,525 responses × 0.433 hours per response) for interstate freight-carrying commercial motor carriers and **240,174** (554,675 responses × 0.433 hours per response) for intrastate freight-carrying commercial motor carriers. The estimated total annual number of respondents (i.e., impacted freight-carrying motor carriers) is **329,364** ([10,778,525 impacted vehicles ÷ 23,268,822 total vehicles] × 711,036 total freight carriers) for interstate freight-carrying commercial motor carriers and **532,279** ([554,675 impacted vehicles ÷ 1,197,439 total vehicles] × 1,149,090 total freight carriers).

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<sup>2</sup> U.S. Department of Transportation (DOT), Federal Motor Carrier Safety Administration (FMCSA). “Federal Motor Carrier Safety Regulations; General; Commercial Motor Vehicle Marking. Final Rule.” 65 FR 35287. June 2, 2000. Available at: <https://www.federalregister.gov/documents/2000/06/02/00-13697/federal-motor-carrier-safety-regulations-general-commercial-motor-vehicle-marking> (accessed June 27, 2022).

“Cost to respondents” (sometimes referred to as “burden hour cost”), as reported here in Section 12, represents the burden hours monetized at an appropriate hourly wage rate.<sup>3</sup> Note that “cost to respondents” is separate and distinct from “cost burden”, which is reported later in Section 13 and represents capital or start-up costs, operation or maintenance costs (such as those for supplies and equipment), or purchases of services resulting from the collection of information.

We assume that respondent occupations correspond to Bus and Truck Mechanics and Diesel Engine Specialists, Standard Occupational Classification (SOC) Code 49-3031. The median hourly wage of Bus and Truck Mechanics and Diesel Engine Specialists (SOC Code 49-3031) in the Truck Transportation industry (NAICS Code 484000) is \$22.66.<sup>4</sup>

To arrive at a loaded wage, we first estimated a fringe benefits rate of 51 percent by dividing the total benefit costs (\$14.14 per hour) by the wages and salaries (\$27.69 per hour) for the transportation and warehousing industry.<sup>5</sup> We then estimated an overhead rate of 27 percent by dividing management and overhead costs (\$0.107 per mile) by labor costs (\$0.39 per mile) for the trucking industry.<sup>6</sup> Using these estimated fringe benefits and overhead rates, we calculated a fully loaded wage rate factor of 1.92 by multiplying the fringe benefits rate (1+0.51) by the overhead rate (1+0.27). Finally, multiplying the median hourly base wage of \$22.66 by this fully loaded wage rate factor results in a fully loaded hourly wage of \$43.51.

We estimate that the 329,364 interstate freight-carrying motor carriers impacted annually will each incur an average of 14.2 burden hours and a cost to respondents of \$617.84 (\$43.51 × 14.2 hours). The annual time burden for interstate freight-carrying motor carriers is **4,667,101** hours (0.433 hours per response × 10,778,525 responses) with a cost to respondents of **\$203,065,583** (\$43.51 × 4,667,101 hours). We estimate that the 532,279 intrastate freight-carrying motor carriers impacted annually will each incur an average of 14.2 burden hours and a cost to respondents of \$617.84 (\$43.51 × 14.2 hours). The annual time burden for intrastate freight-carrying motor carriers is **240,174** hours (0.433 hours per response × 554,675 responses) with a cost to respondents of **\$10,449,977** (\$43.51 × 240,174 hours). Table 1 shows a summary of respondent burden.

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<sup>3</sup> U.S. General Services Administration (GSA), Regulatory Information Service Center (RISC). “ROCIS How To Guide for Agency Users of the Information Collection Request (ICR) Module. July 14, 2021. Available at: [https://www.rocis.gov/rocis/jsp3/common/ROCIS\\_How\\_to\\_Guide\\_for\\_AGENCY\\_Users\\_of\\_ICR\\_Module\\_071421.pdf](https://www.rocis.gov/rocis/jsp3/common/ROCIS_How_to_Guide_for_AGENCY_Users_of_ICR_Module_071421.pdf) (accessed June 27, 2022).

<sup>4</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). “Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 484000 (Truck Transportation).” March 31, 2022. Available at: [https://www.bls.gov/oes/current/naics4\\_484000.htm](https://www.bls.gov/oes/current/naics4_484000.htm) (accessed May 18, 2022).

<sup>5</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). “Employer Costs for Employee Compensation- March 2022. June 2022.” Available at: <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed June 27, 2022).

<sup>6</sup> Mark Berwick and Mohammad Farooq of the Upper Great Plains Transportation Institute, North Dakota State University, August 2003. “Truck Costing Model for Transportation Managers”, pages 41, 43, and 45. Available at: <https://www.mountain-plains.org/pubs/pdf/MPC03-152.pdf> (accessed June 27, 2022).

**Table 1. Freight-carrying commercial motor carriers**

<b>Burden Category</b>	<b>Estimated Annual Number of Respondents</b>	<b>Estimated Annual Number of Responses</b>	<b>Average time for affixing a USDOT number and carrier name</b>	<b>Estimated Total Annual Burden Hours</b>	<b>Median Wage</b>	<b>Cost to Respondents</b>
Interstate freight carrying CMVs impacted	329,364	10,778,525	0.433	4,667,101	\$43.51	\$203,065,583
Intrastate freight carrying CMVs impacted	532,279	554,675	0.433	240,174	\$43.51	\$10,449,977
<b>Totals</b>	<b>861,643</b>	<b>11,333,200</b>		<b>4,907,276</b>		<b>\$213,515,560</b>

**IC 1 Summary**

Estimated Average Annual Burden: 4,907,276 hours

Estimated Average Annual Number of Respondents: 861,643

Estimated Average Annual Number of Responses: 11,333,200

Estimated Average Annual Burden Hour Cost to Respondents: \$213,515,560

**IC 2: Intrastate hazardous materials transporting motor carriers**

FMCSA’s MCMIS and SMS data indicate that there are **37,061** intrastate hazardous materials (HM) transporting carriers operating approximately **1,194,905** power units, as of a February 25, 2022, snapshot.



NHTSA published a report in 1994 which suggests that the average operational life of an intrastate HM carrier was 14.7 years.<sup>7</sup> Therefore, the Agency assumes that each intrastate HM carrier is replaced by a newly acquired vehicle every 14.7 years.

In addition, because of the absence of more reliable data on the sale and resale of used intrastate HM carriers, for purposes of this analysis and to simplify calculations the Agency assumes that the average turnover of vehicles is once every 3 years. The implication of this assumption is that on an annual basis, one-third of intrastate HM carriers, less newly-acquired intrastate HM carriers, are estimated to be resold in a secondary market and undergo re-identification.

Finally, FMCSA estimates that the average life of a weatherproof vinyl label is 7.35 years. Without authoritative information on the average useful life of labeling used on HM carriers, the Agency uses this value of 7.35 years as an estimate of the average useful life of labels on HM carriers.

With these assumptions in mind, the Agency estimates the following for intrastate HM carriers:

- The annual number of newly-acquired intrastate HM carriers is **81,286** (1,194,905 power units ÷ 14.7 years average operational life).
- The annual number of resold intrastate HM carriers, which require re-identification, is estimated to be **371,206** ([1,194,905 power units – 81,286 newly acquired power units] ÷ 3 years average turnover rate).
- The annual number of intrastate HM carriers retained by the owner and that undergo relabeling due to the label reaching the end of its useful life is **101,009** ([1,194,905 power units – 81,286 newly acquired power units – 371,206 resold and relabeled power units] ÷ 7.35 years average label useful life).

This results in an annual estimate of **553,501** intrastate HM carriers (**81,286 + 371,206 + 101,009**) impacted by the marking requirements. These estimated 553,501 intrastate HM carriers impacted by the marking requirements are expected to generate 553,501 responses annually.

The estimated average time for affixing a USDOT number (assuming an average of 7 digits) is 12 minutes (0.20 hours), and the estimated average time for affixing a carrier name (assuming an average of 21 alphanumeric characters) is 14 minutes (0.233 hours). These estimates incorporate a number of factors that vary, including marking via stencils versus decals, amount of cleaning required, weather, and whether a new or existing vehicle is being marked. These estimates are based on responses to FHWA, the predecessor organization to the FMCSA, from interviews with metropolitan Washington, DC, signage companies and Agency employees formerly employed by the motor carrier industry, which were undertaken during the original rulemaking process. This rule was published June 3, 2000.<sup>8</sup> The combined

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<sup>7</sup> U.S. Department of Transportation (DOT), National Highway Traffic Safety Administration (NHTSA). “A Study of Commercial Motor Vehicle Electronics-Based Rear and Side Object Detection Systems. Final Report.” DOT HS 808 080. January 1994. Available at: [https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/dot\\_hs\\_808\\_080.pdf](https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/dot_hs_808_080.pdf) (accessed June 27, 2022).

<sup>8</sup> U.S. Department of Transportation (DOT), Federal Motor Carrier Safety Administration (FMCSA). “Federal

total average time for affixing both a USDOT number and a carrier name is 26 minutes (0.433 hours).

Given the above estimate of 26 minutes (0.433 hours) per vehicle for the total average time for affixing both a USDOT number and a carrier name, the estimated total average annual burden hours is **239,666** (553,501 responses × 0.433 hours per response). The estimated total annual number of respondents (i.e., impacted HM carriers) is **17,167** [(553,501 impacted vehicles ÷ 1,194,905 total vehicles) × 37,061 total HM carriers).

“Cost to respondents” (sometimes referred to as “burden hour cost”), as reported here in Section 12, represents the burden hours monetized at an appropriate hourly wage rate.<sup>9</sup> Note that “cost to respondents” is separate and distinct from “cost burden”, which is reported later in Section 13 and represents capital or start-up costs, operation or maintenance costs (such as those for supplies and equipment), or purchases of services resulting from the collection of information.

We assume that respondent occupations correspond to Bus and Truck Mechanics and Diesel Engine Specialists, SOC Code 49-3031. The median hourly wage of Bus and Truck Mechanics and Diesel Engine Specialists (SOC Code 49-3031) in the Truck Transportation industry (NAICS Code 484000) is \$22.66.<sup>10</sup>

To arrive at a loaded wage, we first estimated a fringe benefits rate of 51 percent by dividing the total benefit costs (\$14.14 per hour) by the wages and salaries (\$27.69 per hour) for the transportation and warehousing industry.<sup>11</sup> We then estimated an overhead rate of 27 percent by dividing management and overhead costs (\$0.107 per mile) by labor costs (\$0.39 per mile) for the trucking industry.<sup>12</sup> Using these estimated fringe benefits and overhead rates, we calculated a fully loaded wage rate factor of 1.92 by multiplying the fringe benefits rate (1+0.51) by the overhead rate (1+0.27). Finally, multiplying the median hourly base wage of \$22.66 by this fully loaded wage rate factor results in a fully loaded hourly wage of \$43.51.

We estimate that the 17,167 HM carriers impacted annually will each incur an average of 14 burden hours and a cost to respondents of \$607.43 (\$43.51 × 14 hours). The total burden for

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Motor Carrier Safety Regulations; General; Commercial Motor Vehicle Marking. Final Rule.” 65 FR 35287. June 2, 2000. Available at: <https://www.federalregister.gov/documents/2000/06/02/00-13697/federal-motor-carrier-safety-regulations-general-commercial-motor-vehicle-marking> (accessed June 27, 2022).

<sup>9</sup> U.S. General Services Administration (GSA), Regulatory Information Service Center (RISC). “ROCIS How To Guide for Agency Users of the Information Collection Request (ICR) Module. July 14, 2021. Available at: [https://www.rocis.gov/rocis/jsp3/common/ROCIS\\_How\\_to\\_Guide\\_for\\_AGENCY\\_Users\\_of\\_ICR\\_Module\\_071421.pdf](https://www.rocis.gov/rocis/jsp3/common/ROCIS_How_to_Guide_for_AGENCY_Users_of_ICR_Module_071421.pdf) (accessed June 27, 2022).

<sup>10</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). “Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 484000 (Truck Transportation).” March 31, 2022. Available at: [https://www.bls.gov/oes/current/naics4\\_484000.htm](https://www.bls.gov/oes/current/naics4_484000.htm) (accessed May 18, 2022).

<sup>11</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). “Employer Costs for Employee Compensation- March 2022. June 2022.” Available at: <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed June 27, 2022).

<sup>12</sup> Mark Berwick and Mohammad Farooq of the Upper Great Plains Transportation Institute, North Dakota State University, August 2003. “Truck Costing Model for Transportation Managers”, pages 41, 43, and 45. Available at: <https://www.mountain-plains.org/pubs/pdf/MPC03-152.pdf> (accessed June 27, 2022).

IC 2 is **239,666 hours** (0.433 hours per response × 553,501 responses) with a cost to respondents of **\$10,427,863** (\$43.51 × 239,666).

### **IC 2 Summary**

Estimated Average Annual Burden: 239,666 hours

Estimated Average Annual Number of Respondents: 17,167

Estimated Average Annual Number of Responses: 553,501

Estimated Average Annual Burden Hour Cost to Respondents: \$10,427,863

### **IC 3: Passenger-carrying commercial motor carriers**

The passenger carrier population impacted by the marking requirements consists of motor carriers transporting passengers in interstate and intrastate commerce in CMVs that: (1) have a gross vehicle weight rating or gross vehicle weight of at least 10,001 pounds, whichever is greater; or (2) are designed or used to transport more than 8 passengers (including the driver) for compensation; or (3) are designed or used to transport more than 15 passengers (including the driver) and are not used to transport passengers for compensation.

FMCSA's MCMIS and SMS database indicates that there are **9,390** active interstate passenger carriers in operation as of a March 25, 2022, snapshot. Of the 9,390 carriers, 5,046 are for-hire carriers, and 4,344 are privately owned not-for-compensation business, or non-business carriers. These carriers operate approximately **213,244** vehicles. FMCSA's MCMIS and SMS database indicates that there are **23,239** active intrastate passenger carriers in operation as of a June 24, 2022, snapshot, operating approximately **24,300** vehicles.

The average operational life of passenger-carrying CMVs varies depending on the type of vehicle (e.g., motorcoach, cutaway, etc.) and a variety of other factors. Information at a sufficiently detailed level could not be readily obtained so as to calculate the average operational life of passenger-carrying CMVs subject to the vehicle marking regulations. Therefore, the Agency uses the same estimate of an average 14.7-year vehicle operational life that was used above for freight-carrying vehicles. Based on a variety of anecdotal evidence regarding the typical useful life of large heavy-duty diesel-powered passenger carrying vehicles (motorcoaches, transit buses, etc.), as well as medium and smaller cutaway style shuttle bus type vehicles, this estimated average of 14.7 years appears to be reasonable.<sup>13</sup>

Reliable data on the sale and resale of used passenger-carrying CMVs could not be readily obtained. Therefore, the Agency assumes that the average turnover of passenger-carrying vehicles is once every 3 years, similar to the assumptions made above in the analysis of freight-carrying vehicles. The implication of this assumption is that on an annual basis, one-third of passenger-carrying CMVs, less newly-acquired passenger-carrying CMVs, are estimated to be resold in a secondary market and undergo re-identification.

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<sup>13</sup> For example, sources referenced included information from the American Bus Association (ABA) and the Federal Transit Administration (FTA).

Finally, similar to the assumptions made above in the analysis of freight-carrying vehicles, the agency assumes 7.35 years as an estimate of the average useful life of labels on passenger-carrying CMVs.

With these assumptions in mind, the Agency estimates the following for passenger-carrying CMVs:

- The average annual number of newly-acquired interstate passenger-carrying CMVs is **14,506** ( $213,244 \text{ power units} \div 14.7 \text{ years average operational life}$ ), and the average annual number of newly-acquired intrastate passenger-carrying CMVs is **1,653** ( $24,300 \text{ power units} \div 14.7 \text{ years average operational life}$ ).
- The average annual number of resold interstate passenger-carrying CMVs which require re-identification is estimated to be **66,246** ( $[213,244 \text{ power units} - 14,506 \text{ newly acquired power units}] \div 3 \text{ years average turnover rate}$ ), and the average annual number of resold intrastate passenger-carrying CMVs which require re-identification is estimated to be **7,549** ( $[24,300 \text{ power units} - 1,653 \text{ newly acquired power units}] \div 3 \text{ years average turnover rate}$ ).
- The average annual number of interstate passenger-carrying CMVs retained by the owner and that undergo relabeling due to the label reaching the end of its useful life is **18,026** ( $[213,244 \text{ power units} - 14,506 \text{ newly acquired power units} - 66,246 \text{ resold and relabeled power units}] \div 7.35 \text{ years average label useful life}$ ), and the average annual number of intrastate passenger-carrying CMVs retained by the owner and that undergo relabeling due to the label reaching the end of its useful life is **2,054** ( $[24,300 \text{ power units} - 1,653 \text{ newly acquired power units} - 7,549 \text{ resold and relabeled power units}] \div 7.35 \text{ years average label useful life}$ ).

This results in an annual average of **98,778** interstate passenger-carrying CMVs ( $14,506 + 66,246 + 18,026$ ) impacted by the marking requirements, and **11,256** intrastate passenger-carrying CMVs ( $1,653 + 7,549 + 2,054$ ) impacted by the marking requirements.

It is assumed that the marking of passenger-carrying vehicles is generally similar in practice to the marking of freight-carrying vehicles, and therefore the Agency estimates that the combined total average time for affixing both a USDOT number and a carrier name to a passenger-carrying CMV is 26 minutes (0.433 hours), similar to the estimate used above in the analysis of freight-carrying vehicles.

Given the above estimate of 26 minutes (0.433 hours) per vehicle for the total average time for affixing both a USDOT number and a carrier name, the estimated total average annual burden hours is **42,771** ( $98,778 \text{ responses} \times 0.433 \text{ hours per response}$ ) for interstate passenger-carrying motor carriers and **4,874** ( $11,256 \times 0.433$ ) for intrastate passenger-carrying motor carriers. The estimated total average annual number of respondents (i.e., impacted passenger-carrying motor carriers) is **4,350** ( $[98,778 \text{ impacted vehicles} \div 213,244 \text{ total vehicles}] \times 9,390 \text{ total passenger carriers}$ ) for interstate passenger-carrying motor carriers and **10,765** ( $[11,256 \text{ impacted vehicles} \div 24,300 \text{ total vehicles}] \times 23,239 \text{ total passenger carriers}$ ) for intrastate passenger-carrying motor carriers.

We assume that respondent occupations correspond to Bus and Truck Mechanics and Diesel Engine Specialists, SOC Code 49-3031. The median hourly wage of Bus and Truck

Mechanics and Diesel Engine Specialists (SOC Code 49-3031) in the Interurban and Rural Bus Transportation industry (NAICS Code 485200) is \$27.97.<sup>14</sup>

To arrive at a loaded wage, we first estimated a fringe benefits rate of 51 percent by dividing the total benefit costs (\$14.14 per hour) by the wages and salaries (\$27.69 per hour) for the transportation and warehousing industry.<sup>15</sup> We then estimated an overhead rate of 27 percent by dividing management and overhead costs (\$0.107 per mile) by labor costs (\$0.39 per mile) for the trucking industry.<sup>16</sup> Using these estimated fringe benefits and overhead rates, we calculated a fully loaded wage rate factor of 1.92 by multiplying the fringe benefits rate (1+0.51) by the overhead rate (1+0.27). Finally, multiplying median hourly base wage of \$27.97 by this fully loaded wage rate factor results in a fully loaded hourly wage of \$53.70.

We estimate that all passenger carriers impacted annually will each incur an average of 9.8 burden hours and a cost to respondents of \$528.05 (\$53.70 × 9.8 hours). The total burden for interstate passenger carriers is **42,771** hours (0.433 hours per response × 98,778 responses) with a cost to respondents of **\$2,296,804** (\$53.70 × 42,771 hours). The total burden for intrastate passenger carriers is **4,874** hours (0.433 hours per response × 11,256 responses) with a cost to respondents of **\$261,734** (\$53.70 × 4,874 hours). Table 2 shows a summary of respondent burden.

**Table 2. Passenger-carrying commercial motor carriers**

Burden Category	Estimated Annual Number of Respondents	Estimated Annual Number of Responses	Average time for affixing a USDOT number and carrier name	Estimated Total Annual Burden Hours	Median Wage	Cost to Respondents
Interstate passenger carrying CMVs impacted	4,350	98,778	0.433	42,771	\$53.7	\$2,296,804
Intrastate passenger carrying CMVs impacted	10,765	11,256	0.433	4,874	\$53.7	\$261,734
<b>Totals</b>	<b>15,114</b>	<b>110,034</b>		<b>47,645</b>		<b>\$2,558,538</b>

<sup>14</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). "Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 485200 (Interurban and Rural Bus Transportation)." Available at: [https://www.bls.gov/oes/current/naics4\\_485200.htm](https://www.bls.gov/oes/current/naics4_485200.htm) (accessed May 18, 2022).

<sup>15</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). "Employer Costs for Employee Compensation- March 2022. June 2022." Available at: <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed June 27, 2022).

<sup>16</sup> Mark Berwick and Mohammad Farooq of the Upper Great Plains Transportation Institute, North Dakota State University, August 2003. "Truck Costing Model for Transportation Managers", pages 41, 43, and 45. Available at: <https://www.mountain-plains.org/pubs/pdf/MPC03-152.pdf> (accessed June 27, 2022).

### IC 3 Summary

Estimated Average Annual Burden: 47,645 hours

Estimated Average Annual Number of Respondents: 15,114

Estimated Average Annual Number of Responses: 110,034

Estimated Average Annual Burden Hour Cost to Respondents: \$2,558,538

### **IC 4: Intermodal equipment providers (IEPs)**

FMCSA's MCMIS indicates that there were 3,369 IEPs operating approximately 10,683,144 pieces of IME as of a February 25, 2022, snapshot. As noted earlier in Section 3, IEPs may choose to meet the marking requirements of 49 CFR 390.21(h) for IME by entering and maintaining equipment identification information in the IANA GIER. The IANA reports that approximately 700,000 pieces of IME were registered in GIER as of early 2022. The Agency determined that 9,983,144 pieces of IME will therefore be used for this analysis (10,683,144 pieces of IME – 700,000 pieces of IME registered in GIER).

Detailed information regarding the average operational life of IME could not be readily obtained. Therefore, the Agency uses the same estimate of an average 14.7-year operational life that was used above for freight-carrying vehicles. Based on a variety of anecdotal evidence, this estimated average of 14.7 years operational life appears to be a reasonable representation of the average operational life of IME.

Reliable data on the sale and resale of used IME was also not readily available. Therefore, the Agency assumes that the average turnover of IME is once every 3 years, similar to the assumptions made above in the analysis of freight-carrying vehicles.

Finally, similar to the assumptions made above in the analysis of freight-carrying vehicles, the Agency estimates 7.35 years as an estimate of the average useful life of labels on IME that are physically marked.

With these estimates in mind, the Agency estimates the following for IME:

- The average annual number of newly-acquired IME that are physically marked is **679,125** (9,983,144 pieces of IME not registered in GIER ÷ 14.7 years average operational life).
- The average annual number of IME not registered in GIER that require physical marking and that are resold and require re-identification is estimated to be **3,101,340** ([9,983,144 pieces of IME not registered in GIER – 679,125 newly acquired] ÷ 3 years average turnover rate).
- The average annual number of IME not registered in GIER that require physical marking and are retained by the owner and undergo relabeling due to the label reaching the end of its useful life is **843,902** ([9,983,144 pieces of IME not registered in GIER – 679,125 newly acquired – 3,101,340 resold and relabeled power units] ÷ 7.35 years average label useful life).

This results in an annual average of **4,624,367** pieces of IME (679,125 + 3,101,340 + 843,902) impacted by the marking requirements. These estimated 4,624,367 pieces of IME

impacted by the marking requirements are expected to generate 4,624,367 responses annually.

It is assumed that the physical marking of IME is generally similar in practice to the marking of freight-carrying vehicles, and therefore the Agency estimates that the combined total average time for affixing both a USDOT number and a carrier name to IME is 26 minutes (0.433 hours), similar to the estimate used above in the analysis of freight-carrying vehicles.

Given the above estimate of 26 minutes (0.433 hours) per vehicle for the total average time for affixing both a USDOT number and a carrier name, the estimated total average annual burden hours is **2,002,351** (4,624,367 responses × 0.433 hours per response). The estimated total average annual number of respondents (i.e., impacted IEPs) is **1,561** [(4,624,367 impacted IMEs ÷ 9,983,144] × 3,369 total IEPs).

We assume that respondent occupations correspond to Bus and Truck Mechanics and Diesel Engine Specialists, SOC Code 49-3031. The median hourly wage of Bus and Truck Mechanics and Diesel Engine Specialists (SOC Code 49-3031) in the Truck Transportation industry (NAICS Code 484000) is \$22.66.<sup>17</sup>

To arrive at a loaded wage, we first estimated a fringe benefits rate of 51 percent by dividing the total benefit costs (\$14.14 per hour) by the wages and salaries (\$27.69 per hour) for the transportation and warehousing industry.<sup>18</sup> We then estimated an overhead rate of 27 percent by dividing management and overhead costs (\$0.107 per mile) by labor costs (\$0.39 per mile) for the trucking industry.<sup>19</sup> Using these estimated fringe benefits and overhead rates, we calculated a fully loaded wage rate factor of 1.92 by multiplying the fringe benefits rate (1+0.51) by the overhead rate (1+0.27). Finally, multiplying the median hourly base wage of \$22.66 by this fully loaded wage rate factor results in a fully loaded hourly wage of \$43.51.

We estimate that the 1,561 IEPs impacted annually will each incur an average of 1,283 burden hours and a cost to respondents of \$55,826.87 (\$43.51 × 1,283 hours). The total burden for IC 4 is **2,002,351** hours (0.433 hours per response × 4,624,367 responses) with a cost to respondents of **\$87,122,286** (\$43.51 × 2,002,351 hours).

#### IC 4 Summary

Estimated Average Annual Burden: 2,002,351 hours

Estimated Average Annual Number of Respondents: 1,561

Estimated Average Annual Number of Responses: 4,624,367

Estimated Average Annual Burden Hour Cost to Respondents: \$87,122,286

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<sup>17</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). "Occupational Employment Statistics (OES). National. May 2021. National Industry-Specific Occupational Employment and Wage Estimates. NAICS 484000 (Truck Transportation)." March 31, 2022. Available at: [https://www.bls.gov/oes/current/naics4\\_484000.htm](https://www.bls.gov/oes/current/naics4_484000.htm) (accessed June 1, 2022).

<sup>18</sup> U.S. Department of Labor (DOL), Bureau of Labor Statistics (BLS). "Employer Costs for Employee Compensation- March 2022. June 2022." Available at: <https://www.bls.gov/news.release/pdf/ecec.pdf> (accessed June 27, 2022).

<sup>19</sup> Mark Berwick and Mohammad Farooq of the Upper Great Plains Transportation Institute, North Dakota State University, August 2003. "Truck Costing Model for Transportation Managers", pages 41, 43, and 45. Available at: <https://www.mountain-plains.org/pubs/pdf/MPC03-152.pdf> (accessed June 27, 2022).

## Summary

The totals are presented below in Table 3. The table displays previously calculated estimates, including number of respondents (number of carriers and IEPs with impacted CMVs and IME), number of responses (number of impacted CMVs and IME), and the total annual hour burden of all responses across vehicles and equipment.

**Table 3. Summary of Average Annual Respondents, Responses, and Burden by IC**

IC	Respondents	Responses	Burden Hours	Respondent Cost
IC 1: Freight Carriers	861,643	11,333,200	4,907,276	\$213,515,560
IC 2: HM Motor Carriers	17,167	553,501	239,666	\$10,427,863
IC 3: Passenger Carriers	15,114	110,034	47,645	\$2,558,538
IC 4: IEPs	1,561	4,624,367	2,002,351	\$87,122,286
<b>Total</b>	<b>895,485</b>	<b>16,621,103</b>	<b>7,196,938</b>	<b>\$313,624,246</b>

**Estimated Average Annual Burden:** 7,196,938 hours

**Estimated Average Annual Number of Respondents:** 895,485

**Estimated Average Annual Number of Responses:** 16,621,103

**Estimated Average Annual Burden Hour Cost to Respondents:** \$313,624,246

## 13. ESTIMATE OF TOTAL ANNUAL COST BURDEN

Cost burden, as reported here in Section 13, represents capital or start-up costs, operation or maintenance costs (such as those for supplies and equipment), or purchases of services resulting from the collection of information.<sup>20</sup> Note that “cost burden” is separate and distinct from the “cost to respondents” (sometimes referred to as “burden hour cost”), which simply represents the burden hours monetized at an appropriate hourly wage rate, and is reported earlier in Section 12.

The estimated total annual cost burden varies by the type of entity (freight-carrying carrier, intrastate HM carrier, passenger-carrying carrier, or intermodal equipment provider), and depends on the material cost per vehicle. The marking requirements call for the display of the carrier’s name and USDOT number, and the marking must be displayed on both sides of the vehicle or equipment. The annual cost burden for each of the four distinct types of motor carriers is addressed separately below.

### (1) Freight-carrying commercial motor carriers

The vast majority of freight-carrying commercial motor carriers currently use stencils or decals for marking, as these are the least expensive methods. The distribution of freight

<sup>20</sup> U.S. General Services Administration (GSA), Regulatory Information Service Center (RISC). “ROCIS How To Guide for Agency Users of the Information Collection Request (ICR) Module. July 14, 2021. Available at: [https://www.rocis.gov/rocis/jsp3/common/ROCIS\\_How\\_to\\_Guide\\_for\\_AGENCY\\_Users\\_of\\_ICR\\_Module\\_071421.pdf](https://www.rocis.gov/rocis/jsp3/common/ROCIS_How_to_Guide_for_AGENCY_Users_of_ICR_Module_071421.pdf) (accessed June 27, 2022).



carriers by size is presented below in Table 4. As shown in Table 4, the majority (87.83 percent) of those carriers is in the smallest fleet size category (1–6 CMVs).

**Table 4. Distribution of Freight Carriers by Size**

Carrier Size	Carriers	Carriers percent	CMVs	CMVs percent
1 to 6	1,633,749	87.83%	1,086,654	4.67%
7 to 19	147,136	7.91%	611,970	2.63%
20 to 100	66,593	3.58%	1,007,540	4.33%
101+	12,649	0.68%	20,562,658	88.37%
<b>Total</b>	<b>1,860,126</b>	<b>100%</b>	<b>23,268,822</b>	<b>100%</b>

The Agency applies the percentage distributions from Table 4 to the estimated total annual number of impacted freight carriers (861,643) and CMVs (11,333,200) to estimate the distribution of impacts by carrier fleet size category (see Table 5).

**Table 5. Distribution of Freight Carriers by Size**

Carrier Size	Carrier Percent	Impacted Carriers	CMVs Percent	Impacted CMVs
1 to 6	87.83%	756,791	4.67%	529,622
7 to 19	7.91%	68,155	2.63%	298,376
20 to 100	3.58%	30,822	4.33%	490,483
101+	0.68%	5,875	88.37%	10,014,719
<b>Total</b>	<b>100%</b>	<b>861,643</b>	<b>100%</b>	<b>11,333,200</b>

The estimated marking costs per CMV are depicted below in Table 4, presented by carrier fleet size category where an inflation cost factor of 1.079<sup>21</sup> was applied. Prices range depending on the type, quality, quantity, and durability of the option, as well as whether it is a do-it-yourself application or custom-made. Small carriers are assumed to use individual stencil kits; medium carriers are assumed to use larger stencil kits; and large carriers are assumed to use individually developed decals. This information is based on responses to the Federal Highway Administration (FHWA, the predecessor organization to the FMCSA) interviews with metropolitan Washington, D.C. signage companies and Agency employees formerly employed by the motor carrier industry, which were undertaken during the original rulemaking process. This rule was published June 3, 2000.<sup>(11)</sup>

<sup>21</sup> CPI-U Value  
<https://www.bls.gov/cpi/data.htm>

<sup>(11)(1)</sup> 65 FR 35287 (June 2, 2000).

**Table 6. Average Material Cost per CMV by Carrier Fleet Size Category**

Carrier Size	Material Cost per CMV		Total Material Cost per CMV by Carrier Size Category
	For Carrier USDOT #	For Carrier Name	
1 to 6	\$11.98	\$18.02	\$30.00
7 to 19	\$8.96	\$13.49	\$22.45
20 to 100	\$5.94	\$8.96	\$14.89
101+	\$3.02	\$4.42	\$7.45

The total cost burden for all freight-carrying motor carriers is estimated by applying the material cost per vehicle to the number of CMVs corresponding to its size category. This information is presented in Table 7. For example, the 1 to 6 carrier size category incurs a cost burden of \$15,888,655 (529,622 impacted CMVs × \$30.00 per CMV). The total annual cost burden for all categories of freight-carrying motor carriers is \$104,500,147.

**Table 7. Total Cost Burden to Freight-Carrying Commercial Motor Carriers**

Carrier Size	Total Number of Impacted CMVs	Material Cost	Total Cost Burden
		per CMV	
1 to 6	529,622	\$30.00	\$15,888,655
7 to 19	298,376	\$22.45	\$6,698,549
20 to 100	490,483	\$14.89	\$7,303,285
101+	10,014,719	\$7.45	\$74,609,658
<b>Total</b>	<b>11,333,200</b>	-	<b>\$104,500,147</b>

**(2) Intrastate hazardous materials (HM) transporting motor carriers**

The vast majority of intrastate hazardous materials transporting motor carriers currently use stencils or decals for marking, as these are the least expensive methods. The distribution of HM carriers by size is presented below in Table 8. As shown in Table 8, the majority (85.92 percent) of those carriers is in the smallest fleet size category.

**Table 8. Distribution of HM Carriers by Size**

Carrier Size	Carriers	Carriers percent	CMVs	CMVs percent
1 to 6	31,841	85.92%	63,249	5.29%
7 to 19	3,780	10.20%	40,510	3.39%
20 to 100	1,287	3.47%	47,366	3.96%
101+	153	0.41%	1,043,780	87.35%

<b>Total</b>	<b>37,061</b>	<b>100%</b>	<b>1,194,905</b>	<b>100%</b>
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The Agency applies the percentage distributions from Table 8 to the estimated total annual number of impacted freight carriers (17,167) and CMVs (553,501) to estimate the distribution of impacts by carrier fleet size category (see Table 9).

**Table 9. Distribution of HM Carriers by Size**

<b>Carrier Size</b>	<b>Carrier Percent</b>	<b>Impacted Carriers</b>	<b>CMVs Percent</b>	<b>Impacted CMVs</b>
1 to 6	85.92%	14,749	5.29%	29,298
7 to 19	10.20%	1,751	3.39%	18,765
20 to 100	3.47%	596	3.96%	21,941
101+	0.41%	71	87.35%	483,497
<b>Total</b>	<b>100%</b>	<b>17,167</b>	<b>100%</b>	<b>553,501</b>

The estimated marking costs per CMV are the same as those in IC 1 and are depicted below in Table 10, presented by carrier fleet size category.

**Table 10. Average Material Cost per CMV by Carrier Fleet Size Category**

<b>Carrier Size</b>	<b>Material Cost per CMV</b>		<b>Total Material Cost per CMV by Carrier Size Category</b>
	<b>For Carrier USDOT #</b>	<b>For Carrier Name</b>	
1 to 6	\$11.98	\$18.02	\$30.00
7 to 19	\$8.96	\$13.49	\$22.45
20 to 100	\$5.94	\$8.96	\$14.89
101+	\$3.02	\$4.42	\$7.45

The total cost burden for all HM carriers is estimated by applying the material cost per vehicle to the number of CMVs corresponding to its size category. This information is presented in Table 11. For example, the 1 to 6 carrier size category incurs a cost burden of \$878,940 (29,298 impacted carriers × \$30.00 per carrier). The total average annual cost burden for all categories of HM carriers is **\$5,228,968**.

**Table 11. Total Cost Burden to HM Carriers**

<b>Carrier Size</b>	<b>Total Number of Impacted CMVs</b>	<b>Material Cost per CMV</b>	<b>Total Cost Burden</b>
1 to 6	29,298	\$30.00	\$878,940
7 to 19	18,765	\$22.45	\$421,274
20 to 100	21,941	\$14.89	\$326,701
101+	483,497	\$7.45	\$3,602,053
<b>Total</b>	<b>553,501</b>	-	<b>\$5,228,968</b>

### (3) Passenger-carrying commercial motor carriers

As noted earlier in Section 12, there are an estimated 110,035 passenger-carrying CMVs that require marking with decals or stencils annually. The estimated cost per passenger-carrying CMV of such marking is \$30.00 (\$11.98 for carrier USDOT number + \$18.02 for carrier name). Therefore, the total cost burden for all passenger carriers impacted by this IC of the marking rule is \$3,301,036 per year (110,035 CMVs × \$30.00 per vehicle) as shown in Table 10. This equates to an annual average of \$218.40 per impacted passenger carrier (\$3,301,036 ÷ 15,114 impacted carriers).

**Table 12. Total Cost Burden to Passenger-Carrying Commercial Motor Carriers**

Material Cost per Vehicle			Total Affected Vehicles	Total Cost Burden for Permanent Marking
For Carrier USDOT #	For Carrier Name	Total Cost per Vehicle		
\$11.98	\$18.02	\$30.00	110,035	\$3,301,036

### (4) Intermodal equipment providers (IEPs)

As noted earlier in Section 12, of the average annual total population of 10,683,144 pieces of IME subject to the vehicle marking requirements, physical marking of IME with the IEP name and USDOT number using stencils or labels need only be performed on the 9,983,144 of IME that are estimated to not be registered in GIER. Of that sub-population of 9,983,144 pieces of IME, it was estimated that an annual average of 4,624,367 are impacted by the marking requirements, as described earlier in Section 12.

The cost burden of physical marking per piece of IME depends on the material cost of physical marking per piece of IME, which in turn depends on the quantity of IME being physically marked by an IEP. The annual average number of pieces of IME impacted by the marking requirements per each of the 1,561 impacted IEPs equals 2,963 (4,624,367 impacted pieces of IME ÷ 1,561 impacted IEPs). Based on this average fleet size of impacted IME per impacted IEP, for simplicity the Agency applies the total material cost per vehicle (for affixing USDOT number plus affixing the carrier name) estimated for freight-carrying commercial motor carriers that have a fleet size of more than 1,000 CMVs. That cost burden estimate is \$3.78 per vehicle.

There is an estimated annual average of 4,624,367 pieces of IME that require physical marking with decals or stencils. Therefore, the total cost burden for all IEPs impacted by this IC of the marking rule is \$17,465,568 per year (4,624,367 pieces of IME × \$3.78 per piece of IME) as shown in Table 13. This equates to an annual average of \$11,192 per impacted IEP (\$17,465,568 ÷ 1,561 impacted IEPs).

**Table 13. Total Cost Burden to Intermodal Equipment Providers (IEPs)**

Material Cost per Vehicle	Annual Average	Total Cost
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For Carrier USDOT #	For Carrier Name	Total Cost per Piece of IME	Number of Affected Pieces of IME	Burden for IEPs
\$1.51	\$2.27	\$3.78	4,624,367	\$17,465,568

### Summary

Table 14 presents the annual cost burden incurred per carrier or IEP, and the total cost burden for all carriers or IEPs. The average cost burden per freight carrier is estimated as a weighted average of the fleet size categories.

**Table 14. Total Annual Cost Burden**

Respondent Type	Number of carriers/IEPs	Cost per Carrier/IEP	Total Cost
IC-1: Freight Carriers	861,643	\$121	\$104,500,147
IC-2: HM Carriers	17,167	\$305	5,228,966
IC-3: Passenger Carriers	15,114	\$218	\$3,301,036
IC4: IEPs	1,561	\$11,192	\$17,465,568
<b>Total</b>	<b>895,485</b>		<b>\$130,495,717</b>

## 14. ESTIMATE OF COST TO THE FEDERAL GOVERNMENT

None. The cost of educating the motor carriers and lessees of the marking requirements and the enforcement of those requirements at the roadside during crash and compliance investigations are covered by existing personnel without further impact to the government.

## 15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS

Table 15 presents the burden for the currently approved information collection, the new burden estimates from this revision, and the resulting total change in burden from the currently approved information collection to this revision.

**Table 15. Total Change in Burden from Currently Approved IC**

Information Collection Version	Annual Number of Responses	Annual Burden Hours	Annual Cost Burden
Currently Approved under OMB Control Number 2126-0054	2,708,527	1,173,695	\$41,148,582
Revised Estimates	16,621,103	7,196,938	\$130,495,717
<b>Total Change in Burden from Currently Approved IC</b>	<b>+13,912,576</b>	<b>+6,023,243</b>	<b>+\$89,347,135</b>

There is an adjustment increase in the number of responses, annual burden hours, and annual cost burden as compared to the currently approved information collection. These changes are due to the availability of improved MCMIS data. For clarification purposes, the HM intrastate carriers are presented separately as IC-2 instead of previously being combined with IC-1. This improved data is responsible for substantial increases in respondents. As well, the adjustments changes are due to updated information regarding industry population for all four carrier/entity types, as well as some small methodological enhancements and corrections to the burden estimates for IEPs.

**16. PUBLICATION OF RESULTS OF DATA COLLECTION**

The results of this ICR will not be published.

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

Not applicable.

**18. EXCEPTIONS TO CERTIFICATION STATEMENT**

None.

## ATTACHMENTS

- A. U.S. DOT FMCSA. “Lease and Interchange of Vehicles; Motor Carriers of Passengers; Extension of Compliance Date.” Final rule; extension of compliance date. 83 FR 62505. December 4, 2018.
- B. U.S. DOT FMCSA. “Lease and Interchange of Vehicles; Motor Carriers of Passengers.” Notice of proposed rulemaking (NPRM); request for comments. 83 FR 47764. September 20, 2018.
- C. U.S. DOT FMCSA. “Lease and Interchange of Vehicles; Motor Carriers of Passengers” Final rule; 84 FR 40272. August 14, 2019.
- D. 49 U.S.C. 31133. “General powers of the Secretary of Transportation.” October 30, 1984.

## ACRONYMS LIST

ABA	American Bus Association
BLS	Bureau of Labor Statistics
CFR	Code of Federal Regulations
CMV	Commercial Motor Vehicle
DOL	Department of Labor
DOT	Department of Transportation
ECEC	Employer Costs for Employee Compensation
FHWA	Federal Highway Administration
FMCSA	Federal Motor Carrier Safety Administration
FR	Federal Register
FTA	Federal Transit Administration
GIER	Global Intermodal Equipment Registry
GSA	General Services Administration
HM	Hazardous Materials
IANA	Intermodal Association of North America
IC	Information Collection
ICR	Information Collection Request
IEP	Intermodal Equipment Provider
IME	Intermodal Equipment
MCMIS	Motor Carrier Management Information System
NAICS	North American Industry Classification System
NHTSA	National Highway Traffic Safety Administration
NPRM	Notice of Proposed Rulemaking
NTSB	National Transportation Safety Board
OES	Occupational Employment Statistics
OIRA	Office of Information and Regulatory Affairs
OMB	Office of Management and Budget
PRA	Paperwork Reduction Act
PRISM	Performance and Registration Information Systems Management
RISC	Regulatory Information Service Center
ROCIS	RISC and OIRA Consolidated Information System
SMS	Safety Measurement System
SOC	Standard Occupational Classification
U.S.C.	United States Code
USDOT	United States Department of Transportation