

**Supporting Statement: Part A**  
**Automated Vehicle Transparency & Engagement for Safe Testing (AV TEST) Initiative**  
**OMB Control Number 2127-0748**

**ABSTRACT:**<sup>1</sup>

The National Highway Traffic Safety Administration (NHTSA) is seeking approval from OMB of this information collection request (ICR) for an extension with modification of its currently approved information collection for the Automated Vehicle Transparency & Engagement for Safe Testing (AV TEST) initiative. This initiative involves the collection of information for a safety information sharing initiative for testing in the United States of vehicles equipped with Automated Driving System (ADS, commonly referred to as “AV”) technology. The voluntarily-provided information is collection on a digital platform on NHTSA’s website and published on NHTSA’s website to provide information about ADS testing to members of the public. The platform collects and provides information from States and local authorities about laws and guidelines for ADS operations and information about specific operations within the U.S. from ADS manufacturers and operators.

One of the key features of the AV TEST Initiative is that each external stakeholder’s participation is completely voluntary, with each participant choosing its respective degree of involvement. As such, respondent submissions may vary in comprehensiveness and frequency of submissions or updates. To facilitate the submissions, NHTSA provides participants with fillable forms on which to submit information for publication onto the website.

The goal is to provide a centralized educational resource for ADS testing information in the United States, as well improve public visibility, engagement, and awareness of ADS developments and testing activities. This collection will continue to consolidate, standardize, and share information on ADS development and testing in the U.S. The questions for this collection can be found in Appendix A, and sample screenshots of the data interface can be found in Appendix B.

The AV TEST Initiative provides a mechanism for Federal, State, and local governments and the automotive industry to coordinate and share information, and public information on ADS testing across the country. Prior, information was largely driven by anecdote, media reporting, or other localized information resources concerning particular ADS testing projects. The absence of a centralized source of information related to ADS vehicle testing inhibited the availability of public feedback concerning testing projects and affects public trust and confidence in the safety performance of innovative technologies under development.

The data and information collection supports two main objectives. The first is to provide the public with access to geographic visualizations of testing at the national, State, and local levels.

---

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

This information is specifically displayed through a graphic of the United States, with projects overlaid on the geographic areas in which the testing project is taking place (“heat map”). By clicking on a testing location, members of the public are able to see additional information about the operation and the ADS operator. Additional information may include basic information about the ADS operator, a brief statement about the entity, specific details of the testing activity, high-level (non-confidential) descriptions of the vehicles and technology, photos of the test vehicles, the dates on which testing occurs, frequency of vehicle operations, the number of vehicles participating in the project, the specific streets or areas comprising the testing routes, information about safety drivers and their training, information about engagement with the community and/or local government, weblinks to the company’s websites with brief introductory statements, and a link to the company’s Voluntary Safety Self-Assessment.

The second objective is to provide public access to information from State and local governments related to legislation, regulations, or guidelines for ADS vehicle testing operations within their jurisdictions, privacy-related issues, emergency response efforts and training directed to ADS technologies, and other local initiatives, such as smart city initiatives, that cultivate ADS testing.

The annual burden has been adjusted from 2,520 to 2,270 hours (a decrease of 250 hours). The adjustment in burden hours is due to the reduction in the number of participants. The number of participants is less than the original estimate. However, the agency believes the annual hours per respondent has not changed.

**1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

NHTSA, under the DOT, was established by the Highway Safety Act of 1970, as the successor to the National Highway Safety Bureau, to carry out safety programs under the National Traffic and Motor Vehicle Safety Act of 1966 and the Highway Safety Act of 1966. The Vehicle Safety Act was subsequently re-codified under Title 49 of the U.S. Code in Chapter 301, Motor Vehicle Safety. Under the authority of the National Traffic and Motor Vehicle Safety Act of 1966, as amended, NHTSA’s purpose is to reduce traffic accidents and deaths and injuries resulting from traffic accidents. 49 U.S.C. 30101. In support of that purpose, the Agency is authorized to carry out needed safety research and development. 49 U.S.C. 30101(2).

DOT and NHTSA are fully committed to reaching an era of crash-free roadways through the deployment of innovative lifesaving technologies. The prevalence of automotive crashes in the United States underscores the urgency to develop and deploy lifesaving technologies that can dramatically decrease the number of fatalities and injuries on our Nation’s roadways. NHTSA believes that ADS technology, including those contemplating no human driver at all, have the potential to significantly improve roadway safety in the United States.

However, such technology remains substantially in development phases with companies across the United States performing varying levels of development, research, and testing relating to the performance of various aspects of ADS vehicle technologies. While much of these development operations occur in private facilities and closed-course test tracks, many stakeholders have progressed to conducting ADS vehicle testing on public roads or in public demonstrations.

To regulate these activities, various levels of local authorities, including cities and States, have developed laws to govern the operation of ADS vehicles on public roads in their jurisdictions. In addition to these regulatory frameworks, multiple authorities seek to cultivate the development and demonstration of ADS technology through the inclusion of ADS technology in local initiatives, such as smart city projects. As such, both national and local authorities have increasingly engaged with ADS technologies in a variety of manners.

Within this diverse backdrop of stakeholder testing programs and regulatory frameworks, the field lacks a centralized resource to consolidate information concerning ADS testing activities and make such information available to the public. NHTSA, as the federal agency charged with promoting motor vehicle safety throughout the Nation and an agency with existing working relationships with both industry stakeholders and local jurisdictions, is uniquely situated to develop such a centralized resource by aggregating information voluntarily provided by external stakeholders and making it available to the public. Such a collection of information is not currently required by statute and NHTSA's current regulatory activities do not collect information spanning the full range of material necessary to develop such a resource.<sup>2</sup> However, working cooperatively with industry stakeholders and local jurisdictions, NHTSA may collate information each external stakeholder respectively identifies for sharing with the agency and organize the information into a cohesive display of national ADS testing programs.

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

The information is compiled and presented to the public on NHTSA's website. The purpose of this collection is to provide a centralized repository of information for the public to better understand the testing of ADS vehicle technology in the United States and applicable State and local requirements and recommendations. The website provides a geographic heat map that enables members of the public to quickly identify ADS testing occurring in particular areas of the country. This seeks to promote both awareness of and public engagement with such projects. By selecting a particular testing operation on the heat map, members of the public are provided additional information about the testing and the ADS operator, and a weblink, if provided, to the operator's website. NHTSA uses the information submitted by State and local authorities to provide a centralized resource to members of the public that allows them to find weblinks to additional information about State or local ADS regulations or other ADS issues, such as privacy or emergency response training. In addition, for projects that intersect with NHTSA regulatory

---

<sup>2</sup> Some pertinent information may already be collected by the agency pursuant to unrelated existing programs, such as the temporary exemption programs of 49 CFR Parts 555 and 591, which are described further herein.

activities or other DOT initiatives, such as grant programs, the resource helps further public understanding regarding federal regulatory activities relating to ADS testing.

**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.**

NHTSA provides a secure, web-enabled access to participants to facilitate the transfer of data and information to the agency. A fillable electronic file provided identifies the general types of data and information requested. The file includes a short set of standard questions that permit the entry of specific values (e.g., number of vehicles at the testing location), and short descriptions with weblinks to the participant's home website (e.g., describe the nature of your test program). Participants decide the frequency and comprehensiveness of their submissions and updates. NHTSA believes this is the least burdensome means for participants to provide data and information, while maintaining some degree of uniformity among participants.

**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.**

The goal of the Initiative is to make available primary-sourced information to the public. As a result, the program seeks to enable external stakeholders to provide information specifically for purposes of its presentation on the AV TEST Initiative website. NHTSA only has primary-source information on a limited number of ADS operations and, to the extent that it does, will repurpose the information to use on the AV Test Initiative. The information that will be repurposed will be taken from NHTSA's exemption programs. This will reduce burden to entities that seek to participate and for which NHTSA has information on ADS operations. Other than for a limited number of ADS operations, NHTSA does not have primary-source information that it can repurpose and, therefore, needs this new collection to be able to provide a centralized resource on ADS operations to members of the public.

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

Given the diverse array of private entities and local governments that currently engage in ADS vehicle testing operations, it is possible that the collection may involve small businesses and local governments that qualify as small entities. However, such entities are not required to participate in the AV TEST program. Thus, both their participation and any information that they elect to submit for publication will be entirely voluntary and within the discretion of those entities. The Initiative does not impose a standardized burden on any such entities. Due to the elective nature of the information submitted, any burden undertaken by such entities through their participation would presumably only amount to the level of effort that each entity deemed worthwhile to advance its goals of increasing public awareness of its ADS activities.

To ameliorate the burden associated with providing information for the program, NHTSA will make electronic forms available for respondents to submit information. Likewise, NHTSA will provide technical assistance to any participating entities with questions or in need of assistance in furnishing information.

**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.**

Without this information collection, NHTSA would be constrained in its ability to provide a resource to members of the public about various ADS operations within the U.S. and about different State or local requirements governing the operation of ADS vehicles. This collection involves the use of an online portal to submit information and respondents may choose how frequently they submit information and how much information they provide. For these reasons, NHTSA does not believe the information collection will be burdensome.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- a. requiring respondents to report information to the agency more often than quarterly;
- b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c. requiring respondents to submit more than an original and two copies of any document;
- d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- e. in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

**8. Provide a copy of the Federal Register document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.**

The Federal Register document (April 6, 2023 [88 FR 20608]) soliciting comments on the collection of information is attached.

On April 6, 2023, NHTSA published a notice in the Federal Register Notice with a 60-day comment period soliciting comments on the information collection (88 FR 20608). NHTSA received a total of 3 comment submission from organizations including, Alliance for Automotive Innovation (Auto Innovators), Owner-Operator Independent Drivers Association (OOIDA) and a joint submission from Safe Kids Worldwide and Safe Kids in Automated Vehicle Alliance (Safe Kids). A summary and response to the comments is provided below.

All commenters supported the Initiative's objective to enhance public education and engagement with public ADS vehicle testing by coalescing information regarding respondents' various testing operations or requirements into a centralized resource including information collected from States and local authorities that regulate ADS operations. Specifically, Auto Innovators commented that providing the public with access to see where testing is occurring at the national, state, and local levels helps provide additional transparency and assurances for how safety, mobility and accessibility issues are being addressed by innovators in the AV space, which is critical for building public acceptance of this burgeoning technology. OOIDA supported the objectives of the AV TEST Initiative by stating, it provides the public with direct and easy access to information about AV testing and development, along with information from states regarding activity, legislation, regulations, and local involvement in automation on our roadways. Safe Kids stated NHTSA's information and data collection under the AV TEST Initiative provides a mechanism to keep the public and safety advocates informed about automated vehicle testing activities to be conducted on public roads throughout the country.

The agency did not receive specific comments on the burden of the data collection, however OOIDA and Auto Innovators provided additional comments on how the agency may enhance the Initiative.

OOIDA stated the voluntary nature of AV TEST has not been effective in producing the necessary safety data to implement informed regulatory policies for autonomous vehicles. The AV TEST Initiative's voluntary structure prevents the program from best accomplishing its goals and NHTSA must require mandatory data transparency from manufacturers because it will help educate consumers, the industry, and regulators about the actual reliability and performance of autonomous technology.

In response, the agency's objective of the AV TEST Initiative is to provide members of the public with a centralized database of high-level information about ADS testing activities and State and local laws, recommendations, and initiatives. It is, therefore, outside of the scope of the project to make any reporting mandatory or to expand the collection to include safety information or information that NHTSA would use to evaluate the safety of ADS operations.

The Auto Innovators provided further comments specific to the AV TEST Initiative and how data is presented to the public. The Auto Innovators stated that it is important that NHTSA conduct periodic reviews to verify the accuracy of information that is made available on the AV TEST initiative portal, and that it is up to date. This may include spot check outreach to select

organizations to provide updates on the status of their operations, or other updates to the data where the information is known to no longer be accurate (for example, if an AV tester were to cease operations).

In response, the agency agrees with the Auto Innovators and believes accurate data serves the intent of the Initiative to enhance public education and engagement with public ADS vehicles. However, NHTSA notes that data submitted as part of the AV TEST Initiative may become stale. For example, because the AV TEST Initiative is voluntary, an ADS operator could provide information on an ADS operation and never update NHTSA when the operation is completed. Although we provide a mechanism for participants to change the status of test sites from active to inactive or completed, participants may not update the status of an operation. NHTSA does reach out to program participants about operations that has not been updated for an extended period of time. In addition, we have provided participants the ability to remove out-of-date information and archive the data, which removes it from the AV TEST web page.

Furthermore, because the information submitted by participants is voluntary, before information is transferred to the public website the agency reviews the submissions for any obvious errors or concerns and will contact the participants accordingly prior to approval for publication if any concerns are identified. The agency also does a general periodic review for information that is out-of-data such as removing participants from the public website when we become aware the entity is no longer testing and has ceased operations.

The Auto Innovators also recommended NHTSA consider repurposing or rebranding the AV TEST initiative to emphasize not only the testing of AVs, but also to capture the transition from testing to real-world deployment. This is unlikely to create any additional burden in terms of the information provided as part of the AV TEST initiative but is likely an important distinction to make in building public acceptance and confidence in new technology. This could perhaps be achieved by using different colors and/or patterns to enable users to distinguish between testing and deployment in the online visualization tool.

In response, the agency believes the AV TEST Initiative needs to evolve over time as the technology progresses and the ADS developers transition their operations to have changing interaction with the public beyond testing and demonstration. Currently, the AV TEST Initiative provides participants the options to identify testing operations where the vehicles are providing a service to the public, however, currently specific to testing and not real-world deployment. As recently as May 10<sup>th</sup>, 2023, the agency held a workshop with participants where we rolled out changes made to the AV TEST website based upon earlier feedback from participants to improve the conveyance of information to the public. We encourage participants and the public to contact the agency on ways to further improve the AV TEST experience.<sup>3</sup> Prior to committing resources, the agency would like further information on the need and scope of the real-world deployment of ADS vehicles.

Lastly, Auto Innovators suggested, NHTSA should proactively encourage states to share information on statewide AV policies or initiatives as part of the AV TEST program, as this information is not only critical for public transparency, but also an important resource for

---

<sup>3</sup> ADSInformationDesk@dot.gov

manufacturers that need to develop systems to account for operational and policy related differences between regions.

In response, the agency has proactively reached out to states and encouraged them to participate in this voluntary program. In discussion with the states, the agency recognizes that each state has their own priorities with respect to ADS vehicles and may have limited resources or interest to participate in AV TEST. The agency continues to encourage state participation, however, as noted earlier this is a voluntary program.

NHTSA appreciates the commenters' input and will keep this input in mind when considering future approaches to ADS technologies.

NHTSA published a 30-day notice on June 30, 2023 requesting comment on NHTSA's intention to submit this ICR to OMB for approval (88 FR 42421, Pages 42421-42424).

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

NHTSA is not providing payment or gifts to respondents.

**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.**

Confidentiality is not applicable because the information provided to NHTSA is provided specifically for the purpose of publication on NHTSA's website for the program. All respondents to this voluntary collection will be informed that all information provided may be made public on NHTSA's website and will be advised not to submit any information that would be considered confidential. No SORN is required for this project. A Privacy Threshold Assessment was conducted and approved in 2020 and included with this renewal.

**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.**

NHTSA is not asking any questions of this nature. All information for the program is business-related information concerning an entity's automated vehicle operations in the United States or information provided by States or local authorities about their laws, regulations, and recommendations pertaining to ADS operations and about ADS-related activities.

**12. Provide estimates of the hour burden of the collection of information on the respondents.**



The AV TEST Initiative currently has over 50 activate participants but could involve up to 75 respondents in the next three years, as an increasing number of stakeholders enter the ADS vehicle and ADS vehicle equipment fields. The AV TEST Initiative involves two information collections. The first information collection involves (1) original manufacturers of ADS vehicles or ADS vehicle equipment and (2) operators of ADS vehicles (currently 31 participants). The second information collection is directed at States and other local authorities that regulate ADS vehicle activity within their respective jurisdictions (currently 24 participants). NHTSA anticipates that up to 75 respondents including approximately 40 ADS vehicle or technology manufacturers and operators and 35 States and local jurisdictions could participate in the program over the next three years.

When the agency originally sought approval for this information collection, it was estimated there could be up to 100 respondents including approximately 40 ADS vehicle or technology manufacturers and operators and 60 States and local jurisdictions. The new burden attributed to this information collection reflects a lower participation in this voluntary program based upon actual participation than what was originally estimated.

While both collections involve electronic submission of information on a portal, the underlying information collected from the private industry respondents and State and local authorities is very different. While private industry respondents will be asked for information about individual ADS testing operations, State and local authorities will only be asked for limited information, primarily in the form of short descriptions and weblinks, about ADS related activities such as legislation, regulations, guidelines, and other policies or activities related to ADS.

NHTSA estimates that each private industry respondent can be reasonably expected to expend approximately 48 hours per year, or approximately 4 hours per month on inputting or updating information on ADS activities. Therefore, for the estimated 40 ADS operator participants, the total burden is estimated to be 1,920 hours per year (40 respondents × 48 hours).

NHTSA estimates that each State or local authority respondent would spend approximately 10 hours responding to this collection. Therefore, for the estimated 35 State or local authority participants, the total burden is estimated to be 350 hours per year. Assuming the program attracts 75 respondents per year (40 private industry and 35 State or local authority respondents), the total burden for the entire information collection request is estimated to be 2,270 hours (1,920 hours + 350 hours).

The foregoing estimates reflect both NHTSA's expectation about the scope of information respondents decide to submit, as well as average burdens experienced by a sample of respondents throughout the course of the program. While the foregoing numbers estimate a reasonable expenditure, the actual amount of effort and time dedicated to a submission will ultimately depend on how much each individual respondent elects to contribute. For example, a private industry respondent with many more operations within the U.S. may expend closer to 70 hours per year updating information about the various operations while a respondent with only a few operations may expend only 20 hours per year. Additionally, as there is no set recommendation for how often to update information, the frequency of submissions is expected

to vary by respondent. NHTSA expects that States and local authorities will update information less frequently as they will continue to primarily submit information describing existing regulations and procedures governing ADS operations within their borders. Once adopted, most of these statutes and regulations remain in place for many months to years.

The labor cost associated with this collection of information is derived by (1) applying the appropriate average hourly labor rate published by the Bureau of Labor Statistics, (2) dividing by either 0.705<sup>4</sup> (70.5%), for private industry workers, or 0.619 (61.9%), for state and local government workers, to obtain the total cost of compensation, and (3) multiplying by the estimated burden hours for each respondent type.

Labor costs associated with original manufacturers of ADS Vehicles or ADS vehicle equipment and operators of ADS vehicles are estimated to be \$60.48 per hour for “Project Management Specialists,” Occupation Code 13-1082, (\$42.64<sup>5</sup> per hour ÷ 0.705). The labor cost per private industry respondent for each year for development and submission of information is estimated to be \$2,903.04 (\$60.48 × 48 hours). Therefore, the total annual labor cost for private industry to participate in the AV TEST Initiative is estimated to be \$116,121.60 (\$2,903.04 × 40 respondents).

Labor costs associated with local and regional authorities, such as states, counties, and cities are estimated to be \$66.79 per hour for “Legal Support Workers,” Occupation Code 23-2099, (\$41.34<sup>6</sup> per hour ÷ 0.619). The labor cost per regional authority respondent for each year for development and submission of information is estimated to be \$667.90 (\$66.79 × 10 hours). Therefore, the total annual labor cost for regional authorities to participate in the AV TEST Initiative is estimated to be \$23,376.50 (\$667.9 × 35 respondents).

The total annual labor costs for all respondents, private industry and regional authorities together, are estimated to be \$139,499 (\$116,122 + \$23,377). See Table 1 below for a summary of estimated burden hours and estimated labor costs.

---

<sup>4</sup> See Table 1. Employer Costs for Employee Compensation by ownership (Sep. 2022), available at <https://www.bls.gov/news.release/ecec.t01.htm> (accessed March 14, 2023).

<sup>5</sup> See May 2021 National Industry-Specific Occupational Employment and Wage Estimates NAICS 336100 - Motor Vehicle Manufacturing, available (accessed March 14, 2023).

<sup>6</sup> See May 2021 National Occupational Employment and Wage Estimates by ownership Federal, state, and local government, including government-owned schools and hospitals and the U.S. Postal Service, available at <https://www.bls.gov/oes/current/999001.htm#23-0000> (accessed March 14, 2023).

**Table 1: Summary of Estimated Burden Hours and Estimated Labor Costs**

<b>Respondent Type</b>	<b>Number of Respondents</b>	<b>Annual Hours per Respondent</b>	<b>Labor Cost per Hour</b>	<b>Annual Labor Cost per Respondent</b>	<b>Total Estimated Burden Hours</b>	<b>Total Annual Labor Costs</b>
Original Manufacturer of ADS Vehicles or ADS Vehicle Equipment and Operators of ADS Vehicles	40	48	\$60.48	\$2,903.04	1,920	\$116,122
State or Local Authority	35	10	\$66.79	\$667.900	350	\$23,377
<b>Total All Respondents</b>	<b>75</b>				<b>2,270</b>	<b>\$139,499</b>

The total burden hours have been reduced from the original estimate of 2,520 when the agency first sought approval for this information collection because of the lower estimated participation. However, the agency believes the annual hours per respondent has not changed.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

The collection for the AV TEST initiative requires no additional costs to the respondents. Although submissions will involve the use of technology to facilitate the transfer of information to NHTSA, NHTSA does not expect the need for respondents to acquire or develop technological prerequisites beyond the ordinary computer capabilities already possessed by the anticipated respondents.

**14. Provide estimates of annualized costs to the Federal government.**

The AV TEST Initiative increased costs to the Federal government by approximately \$650,500. NHTSA estimated this burden by looking at the additional Information Technology (IT) and federal staff resourcing needed for onboarding and data management. The burden to the Agency is primarily in the form of maintenance of an existing platform to support the program. In addition, there is an inherited ongoing cost that includes: federal labor hours to support program coordination and data use; operations and maintenance of the platform; account and data management; and security monitoring to fulfill federal system security needs. The chart below summarizes this overall annual burden to the agency.

<b>Resource(s)</b>	<b>Description</b>	<b>Annual Estimate</b>
<b>Application Maintenance and Operations</b>	General Support and Maintenance for the Application and Platform: Information Technology	\$400,000
<b>Information Technology Infrastructure Maintenance</b>	Server and Infrastructure Ongoing Support on Shared Platform	\$50,000
<b>Federal Application and Platform Security Monitoring</b>	Monitoring and Updates to Security Controls on the Platform to Include Updated Documentation and Controls; Includes Account Authentication Management	\$25,000
<b>Federal Labor Contribution</b>	1.5 Federal Full Time Equivalent Employees Across the Agency (includes a dedicated resource management analyst plus portions of others' time): Averaged at GS-13/5 Salary	\$175,500
	<b>Total Annual Agency Burden</b>	<b>\$650,500</b>

**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.**

The annual burden has been adjusted from 2,520 to 2,270 hours (a decrease of 250 hours). The adjustment in burden hours is due to the reduction in the number of participants. The number of participants is less than the original estimate. However, the agency believes the annual hours per respondent has not changed.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

NHTSA publishing the information obtained through the AV TEST Initiative publicly on a section of the agency's website designed for the program. One of the primary features of this website is the display of a geographic heat map showing ADS operation locations superimposed on a map of the U.S., and members of the public are able to click on testing locations to obtain additional information about the testing activity, such as frequency of testing and duration of testing. Members of the public are also provided with weblinks, prefaced by short introductory statements, to participating entities' websites.

The website also provides information from State and local government respondents about their laws, regulations, and recommendations for ADS operations. State and local authorities may provide additional information about their ADS-related activities, such as any public grant programs or smart city initiatives that may be associated with testing programs in their jurisdictions. The information collected from States and local authorities are primarily weblinks

to the respondents' websites with short introductory statements that describe the contents of the referenced webpage. This information is published on NHTSA's websites and allows members of the public interested in information on a particular State or local jurisdiction to view the weblinks.

**17. OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Approval is not sought to not display the expiration date for OMB approval.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.<sup>7</sup>**

No exceptions to the certification statement are made. When respondents submit information to NHTSA, they will be presented with the following statement on the electronic portal:

Paperwork Reduction Act Statement: A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-0748 This information is being collected to create a centralized educational resource for ADS testing information in the United States, as well improve public visibility, engagement, and awareness of ADS developments and testing activities. As the purpose of this information collection is to provide information to members of public, please do not submit any information that you consider to be confidential using this portal. If you would like to provide confidential information, please consult NHTSA's regulations at 49 CFR Part 512, "Confidential Business Information," Responding to this collection is completely voluntary. We estimate that participation in AV TEST will take approximately [insert 10 hours for State/local authority portal or 48 hours for ADS developer portal] per year. However, your burden is dependent on your level of voluntary participation and how frequently you choose to update information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety

---

<sup>7</sup> Specifically explain how the agency will inform potential respondents of the information required under 5 CFR 1320.8(b)(3): the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.