

National Highway Traffic Safety Administration  
SUPPORTING STATEMENTS: PART A  
OMB No. 2127-0616  
FOR 49 CFR Part 579

Reporting of Information and Documents about Potential Defects

**Abstract:**

This information collection request (ICR) is for an extension without change of National Highway Traffic Safety Administration's (NHTSA) currently approved information collection for reporting of information and documents about potential defects. Under 49 CFR part 579, manufacturers of motor vehicles and motor vehicle equipment must report information and communications to NHTSA with respect to possible safety-related defects and non-compliances in their products, including the reporting of safety recalls and other safety campaigns the manufacturer conducts outside the United States. Under part 579, there are three categories of reporting requirements: (1) requirements at § 579.5 to submit notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications (found in subpart A of part 579); (2) requirements at § 579.11 to submit information related to safety recalls and other safety campaigns in foreign countries (found in subpart B of Part 579); and (3) requirements at §§ 579.21-28 to submit Early Warning Information (found in subpart C of part 579). The Early Warning Reporting (EWR) requirements (49 U.S.C. 30166(m); 49 CFR part 579, subpart C) specify that manufacturers of motor vehicles and motor vehicle equipment must submit to NHTSA information, periodically (quarterly or monthly) or upon NHTSA's request, that includes claims for deaths and serious injuries, property damage data, communications from customers and others, information on incidents resulting in fatalities or serious injuries from possible defects in vehicles or equipment in the United States or in identical or substantially similar vehicles or equipment in a foreign country, and other information that assist NHTSA in identifying potential safety-related defects. In addition to requiring submissions periodically and upon request, this ICR includes a requirement to submit information within 5 days of information becoming available regarding foreign safety campaigns. The purpose of this information collection is to provide early warning of potential safety-related defects to NHTSA. The estimated burden for this information collection is 51,327 hours annually. This is 2,483 hours less than when NHTSA last received approval for this information collection (from 53,810 hours to 51,327 annually).

A. JUSTIFICATION

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

The Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act (Public Law 106-414) was enacted on November 1, 2000. This Act

includes a requirement that the NHTSA conduct Early Warning Reporting (EWR) rulemaking to require manufacturers of motor vehicles and motor vehicle equipment to submit information, periodically or upon NHTSA's request, that includes claims for deaths and serious injuries, property damage data, communications from customers and others, information on incidents resulting in fatalities or serious injuries from possible defects in vehicles or equipment in the United States or in identical or substantially similar vehicles or equipment in a foreign country, and other information that would assist NHTSA in identifying potential safety-related defects. The purpose of this legislation is to provide early warning of potential safety-related defects.

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

The information sought by NHTSA is used to promptly identify potential safety-related defects in motor vehicles and motor vehicle equipment in the United States. When a trend in incidents arising from a potentially safety-related defect is discovered, NHTSA relies on this information, along with other agency data, to determine whether or not to open a defect investigation. NHTSA is authorized to conduct such investigations by Title 49 U.S.C. Chapter 301 – Motor Vehicle Safety. The data collected pursuant to part 579 assists NHTSA in identifying potential safety-related issues. Some of these investigations have influenced safety-related recalls and service campaigns.

The information collected under part 579 includes: (1) notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications (found in subpart A of part 579); (2) information related to safety recalls and other safety campaigns in foreign countries (found in subpart B of part 579); and (3) requirements at §§ 579.21-28 to submit Early Warning Information (found in subpart C of part 579). The Early Warning Reporting (EWR) requirements (49 U.S.C. 30166(m); 49 CFR part 579, subpart C) specify that manufacturers of motor vehicles and motor vehicle equipment must submit to NHTSA information, periodically or upon NHTSA's request, that includes claims for deaths and serious injuries, property damage data, communications from customers and others, information on incidents resulting in fatalities or serious injuries from possible defects in vehicles or equipment in the United States or in identical or substantially similar vehicles or equipment in a foreign country, and other information that assist NHTSA in identifying potential safety-related defects.

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.

Current part 579 information collection is performed electronically via NHTSA's online EWR portal for subparts A (Manufacturer Communications) and C (EWR data) and via email for subpart B (Foreign Campaigns). The reporting portal is a secure site that downloads the data directly into our case management system. Portal reporting for subpart B is in development and should be implemented within the next year to complete NHTSA's full implementation of online portal collection of part 579 information with training and HelpDesk support for manufacturers. NHTSA has closely coordinated the design of the data system to accommodate manufacturers' needs. Most of the required data is submitted using electronic filing of standard format spreadsheets; and copies of documents, where required, are submitted using standard graphics image transfer in most cases. If a manufacturer does not have the capability to utilize electronic submission (i.e. high speed data transfer), alternatives are available, including electronic forms on NHTSA's web site.

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

NHTSA is the only governmental agency that requires manufacturers to submit this information; consequently, there is no duplication of the data submitted and the information is not already available elsewhere. The unique file naming convention also prevents duplication of submission as part of the verification process when the information is submitted.

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

Although portions of the part 579 reporting requirements impact small businesses, NHTSA has taken steps to minimize this burden, which include using electronic means of submissions. Further, light vehicle manufacturers, trailer manufacturers, motorcycle manufacturers, and medium and heavy truck manufacturers of fewer than 5,000 vehicles, emergency vehicle manufacturers of fewer than 500 vehicles, and bus manufacturers of fewer than 100 buses, as well as manufacturers of motor vehicle equipment other than tires and child restraint systems, will be exempt from most of the reporting requirements, and will be required to report only claims and notices of death where an allegation is made of a possible defect in their products, manufacturer communications, and notices of foreign campaigns. Although the EWR requirements may impact small child restraint, tire, some bus and emergency vehicle manufacturers, NHTSA has used the EWR data to influence a significant number of recalls. Therefore, the agency believes that the injury reducing and life-saving benefits of removing defective equipment from our roads outweighs the burden to these small businesses.

Regarding foreign safety campaigns, this information collection can impact small businesses; however, the information that is required has been set at the minimum necessary to describe the safety recall or safety campaign and how it potentially affects identical or similar products sold in the United States.

6. Describe the consequences 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.

This information collection is essential to meeting the purpose of the TREAD Act and allows NHTSA to collect early warning information to assist the agency in identifying safety-related defects. Without it, the objectives of the TREAD Act cannot be achieved. These include reducing the number of motor vehicle crashes, and the number of associated injuries and deaths by providing early warning of safety-related defects. NHTSA has determined that reducing the frequency of reporting, from quarterly, would affect the timeliness of the action that could be taken to prevent motor vehicle crashes, injuries and fatalities caused by safety-related defects.

7. Explain any special circumstances that require the 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.

This information collection request includes requirements to report some information more often than quarterly, to prepare a written response to a

collection of certain information in fewer than 30 days after receipt of it, and requirements for respondents to retain records for more than three years.

The information collection request involves one reporting requirement, at 49 CFR 579.5(d) to submit notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications (found in subpart A of part 579), that is more often than quarterly and pertains to manufacturer communications, which are required to be submitted monthly. NHTSA has determined that monthly reporting is required to provide NHTSA with timely information about possible safety-related defects.

This information collection request also involves a requirement to submit information about foreign safety campaigns within 5 working days of the information becoming available. This is required by the TREAD Act and codified at 49 U.S.C. 30166(1).

Finally, this information collection request includes a requirement, at 49 CFR 576.5(b) for manufacturers of motor vehicles and motor vehicle equipment to retain all the underlying records on which the information reported under part 579 is based, for a period of five calendar years from the date on which they were generated or acquired by the manufacturer.<sup>1</sup>

8. Provide a copy of the Federal Register document soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.

NHTSA published a Federal Register notice soliciting comments on this collection on September 20, 2024 (See 89 FR 77228). A total of 5 comments from 3 commenters were submitted in response to the 60-day notice. None of the comments concerned the cost or hour burden of part 579 information collection. NHTSA published a Federal Register 30-day notice soliciting comments on this collection on February 14, 2025 (See 90 FR 9655). Comments to the 30-day notice are due on or before March 17, 2025.

In addition, NHTSA communicates on a regular basis with manufacturers regarding TREAD submissions and provides an EWR Helpdesk to assist respondents who experience concerns with the reporting process. As noted in the response to Question 3, part 579 information collection is currently received via NHTSA's online EWR portal for subparts A and C. Portal reporting for subpart B

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<sup>1</sup> The record retention requirement in 49 CFR 576.5(b) does not apply to documents transmitted to the Agency pursuant to parts 573, 577, and 579 (49 CFR 576.5(c)).

is in development and is expected to be implemented within the next year completing the transition to full online portal reporting of part 579 information with training and helpdesk support provided to vehicle and equipment manufacturers. This system was designed to accommodate the needs of respondents. The training materials are available online as a resource for existing and new respondents. When necessary, ODI has provided direct, one-on-one assistance to respondents experiencing issues with any part of the TREAD reporting process.

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

This information collection does not involve any payments 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.

NHTSA's Confidential Business Information (CBI) regulation, 49 CFR part 512 establishes a specific procedure for seeking confidentiality. The CBI final rule, published on October 19, 2007 (72 FR 59434), issued determinations that certain classes of early warning information are confidential. These classes are warranty claims, warranty adjustments for tires, field reports and hard copies of non-dealer field reports, consumer complaints, common green tire identifiers and production data for equipment and vehicles other than light vehicles. In addition, NHTSA determined that the last six (6) characters of the Vehicle Identification Number (VIN) in information related to EWR death and injury incident reports are confidential.

The CBI regulation did not establish class determinations for death or injury claims or notices, property damage claims or production information for light vehicles. If a manufacturer seeks confidential treatment of the data, it must submit a request for confidentiality in accordance with NHTSA's regulations for granting confidential treatment, 49 CFR part 512, *Confidential Business Information*, and NHTSA will provide confidentiality, as appropriate.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are involved in this information collection.

12. Provide estimates of the hour burden of the collection of information.

NHTSA now estimates the total annual burden hours associated with this collection to be 51,327 hours based on analysis of EWR reporting data from the 2021 through 2023 reporting years. This is a decrease of 2,483 hours from when this information collection was last approved.

When this information collection was last renewed in April 2022, NHTSA estimated the total annual burden associated with this collection to be 53,810 burden hours and \$2.439 million in associated labor costs. NHTSA is updating these estimates to better align with the current number of responding manufacturers and volume of submissions. NHTSA now estimates the annual burden hours associated with this collection to be 51,327 hours with \$2.776 million in associated labor costs.

Under part 579, there are three categories of reporting requirements: (1) requirements at § 579.5 to submit notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications (found in subpart A of part 579); (2) requirements at § 579.11 to submit information related to safety recalls and other safety campaigns in foreign countries (found in subpart B of part 579); and (3) requirements at §§ 579.21-28 to submit Early Warning Information (found in subpart C of part 579). The Early Warning Reporting (EWR) requirements (49 U.S.C. 30166(m); 49 CFR part 579, subpart C) specify that manufacturers of motor vehicles and motor vehicle equipment must submit to NHTSA information, periodically or upon NHTSA's request, that includes claims for deaths and serious injuries, property damage data, communications from customers and others, information on incidents resulting in fatalities or serious injuries from possible defects in vehicles or equipment in the United States or in identical or substantially similar vehicles or equipment in a foreign country, and other information that assist NHTSA in identifying potential safety-related defects.

In addition to the burdens associated with submitting information required under each subpart of part 579, NHTSA also estimates that manufacturers will incur computer maintenance burden hours, which are estimated on a per manufacturer basis.

**Requirements under Part 579, Subpart A:**

The first component of this collection request covers the requirements found in part 579 subpart A, § 579.5, *Notices, bulletins, customer satisfaction campaigns, consumer advisories, and other communications*. Section 579.5 requires manufactures to furnish (1) a copy of all notices, bulletins, and other communications sent to more than one manufacturer, distributor, dealer, lessor, lessee, owner, or purchaser, in the United States, regarding any defect in its vehicles or items of equipment (including any failure or malfunction beyond normal deterioration in use, or any failure of performance, or any flaw or unintended deviation from design specifications), whether or not such defect is

safety-related and (2) a copy of each communication relating to a customer satisfaction campaign, consumer advisory, recall, or other safety activity involving the repair or replacement of motor vehicles or equipment, that the manufacturer issued to, or made available to, more than one dealer, distributor, lessor, lessee, other manufacturer, owner, or purchaser, in the United States. Manufacturers are required to submit this information monthly. However, Section 579.5 does not require manufacturers to create these documents. Instead, only copies of these documents must be submitted to NHTSA and manufacturers must index these communications and email them to NHTSA within 5 working days after the end of the month in which they were issued. Therefore, the burden hours are only those associated with collecting the documents and submitting copies to NHTSA.

NHTSA estimates that it receives approximately 17,615 notices a year. We estimate that it takes about 5 minutes to collect, index, and submit each notice to NHTSA. Therefore, we estimate that it takes 1,468 hours for manufacturers to submit notices as required under Section 579.5 (17,615 notices × 5 minutes = 88,075 minutes or 1,468 hours) annually.

To calculate the labor cost associated with submitting Section 579.5 notices, bulletins, customer satisfaction campaigns, consumer advisories and other communications that are sent to more than one dealer or owner, NHTSA referenced wage estimates for the type of personnel submitting the documents. While some manufacturers employ clerical staff to collect and submit the documents, others use technical computer support staff to complete the task. Because we do not know what percent of the work is completed by clerical or technical computer support staff, NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for the higher-paid technical computer support staff.

The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Computer Support Specialists (BLS Occupation code 15-1230) in the Motor Vehicle Manufacturing Industry is \$37.62.<sup>2</sup> The Bureau of Labor Statistics estimated that private industry workers' wages represented 70.4 percent of employer costs for employee compensation in December 2023 (ECEC adjustment).<sup>3</sup> Based on the BLS average hourly wage and ECEC adjustment factor, NHTSA estimates the hourly labor costs to be \$53.44 for Computer Support Specialists ( $\$37.62 \div 0.704 = \$53.44$ ). The incremental labor cost per submission is estimated to be \$4.45 ( $\$53.44 \text{ per hour} \times 5 \text{ minutes}$ ). NHTSA estimates the total labor cost associated with the 1,468 burden hours for § 579.5 submissions to be \$78,387 ( $\$4.45 \times 17,615 \text{ submissions}$ ).

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<sup>2</sup> May 2023 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Computer Support Analyst (Code 15-1230), \$37.62, [https://www.bls.gov/oes/2023/may/naics4\\_336100.htm#15-0000](https://www.bls.gov/oes/2023/may/naics4_336100.htm#15-0000), divided by 70.4 percent for total employer costs for employee compensation, [https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Last Accessed August 12, 2024.

<sup>3</sup> March 2024 News Release – Employer Costs for Employee Compensation – December 2023, U.S. Bureau of Labor Statistics. Last Accessed August 12, 2024.



Table 1 provides a summary of the burden estimates using the average annual submission count for monthly reports submitted pursuant to § 579.5 and the estimated burden hours and labor costs associated with those submissions. The average number of annual submissions under § 579.5 decreased by approximately 29 percent from the currently approved information collection, dropping from 24,884 to 17,615 manufacturer communication submissions. The incremental cost per submission rose from \$3.73 to \$4.45, a 19 percent increase. The annual burden hours dropped from 2,074 to 1,468, matching the 29 percent drop in submissions. The annual labor costs dropped from \$92,817 to \$78,387, a 16 percent decrease with the reduction in submissions partially offset by the increased labor cost per submission.

TABLE 1 – ANNUAL BURDEN ESTIMATE FOR § 579.5 SUBMISSIONS

Average Annual § 579.5 Submissions	Estimated Burden Per Submission	Average Hourly Labor Cost	Labor Cost Per Submission	Total Annual Burden Hours	Total Annual Labor Costs
17,615	5 minutes	\$53.44	\$4.45	1,468	\$78,386.75 or \$78,387

**Requirements under Part 579, Subpart B (Foreign Reporting)**

The second component of this information collection request covers the requirements found in part 579 subpart B, “Reporting of Safety Recalls and Other Safety Campaigns in Foreign Countries.” Pursuant to § 579.11, whenever a manufacturer determines to conduct a safety recall or other safety campaign in a foreign country, or whenever a foreign government has determined that a safety recall or other safety campaign must be conducted, covering a motor vehicle, item of motor vehicle equipment, or tire that is identical or substantially similar to a vehicle, item of equipment, or tire sold or offered for sale in the United States, the manufacturer must report to NHTSA not later than 5 working days after the manufacturer makes such determination or receives written notification of the foreign government’s determination. Section 579.11(e) also requires each manufacturer of motor vehicles to submit, not later than November 1 of each year, a document that identifies foreign products and their domestic counterparts.

To provide the information required for foreign safety campaigns, manufacturers must (1) determine whether vehicles or equipment that are covered by a foreign safety recall or other safety campaign are identical or substantially similar to vehicles or equipment sold in the United States, (2) prepare and submit reports of these campaigns to the agency, and (3) where a determination or notice has been made in a language other than English, translate the determination or notice into English before transmitting it to the agency.

NHTSA estimates that there is no burden associated with determining whether an individual safety recall covers a foreign motor vehicle or item of motor vehicle equipment that is identical or substantially similar to those sold in the United States because manufacturers can simply consult the list that they are required to submit

each year. Therefore, the only burden associated with determining whether a foreign safety recall or other safety campaign is required to be reported to NHTSA is the burden associated with creating the annual list. NHTSA continues to estimate that it takes approximately 9 hours per manufacturer to develop and submit the list. The 9 hours are comprised of 8 attorney hours and 1 hour for IT work. NHTSA receives these lists from 99 manufacturers, on average, resulting in 891 burden hours (99 vehicle manufacturers × 8 hours for attorney support = 792 hours) + (99 vehicle manufacturers × 1 hour for IT support = 99 hours).

NHTSA estimates that preparing and submitting each foreign defect report (foreign recall campaign) requires 1 hour of clerical staff and that translation of determinations into English requires 2 hours of technical staff (note: This assumes that all foreign campaign reports require translation, which is unlikely). Between 2021 and 2023 NHTSA received a yearly average of 262 foreign campaign reports. NHTSA estimates that in each of the next three years, NHTSA will receive, on average, 262 foreign recall reports. NHTSA estimates that each report will take 3 hours (1 hour to prepare by a clerical employee and 2 hours for translation). Therefore, NHTSA estimates that the burden hours associated with submitting these reports will be 786 hours (3 hours per report × 262 reports).

Therefore, NHTSA estimates the total annual burden hours for reporting foreign campaigns and substantially similar vehicles is 1,677 hours (891 hours for submitting annual lists + 786 hours for submitting foreign recall and safety campaign reports). This is an increase of 87 burden hours from our previous estimate (1,677 hours for the current estimate - 1,590 hours for the previous estimate). Table 2 provides a summary of the estimated burden hours for part 579 subpart B submissions.

TABLE 2 – ANNUAL BURDEN HOUR ESTIMATES FOR FOREIGN REPORTING

Submission Type	Annual Number of Submissions	Burden Hours Per Report	Total Annual Burden Hours
Foreign Campaign Report	262	1 hour clerical + 2 hours translation = 3 hours	786
Annual List	99	8 hours attorney + 1 hour IT = 9 hours	891
	<b>Total</b>		<b>1,677</b>

To calculate the labor cost associated with part 579 foreign reporting submissions, NHTSA looked at wage estimates for the type of personnel submitting the documents. As stated above, NHTSA estimates that submitting annual lists under § 579.11(e) will involve 8 hours of attorney time and 1 hour of IT work. The average hourly wage for Lawyers (BLS Occupation code 23–1000) in the Motor Vehicle Manufacturing Industry is \$112.21.<sup>4</sup> After applying the 70.4 percent ECEC

<sup>4</sup> May 2023 National Industry-Specific Wage Estimates, - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Lawyers (Code 23-1011), \$112.21, [https://www.bls.gov/oes/2023/may/naics4\\_336100.htm#23-0000](https://www.bls.gov/oes/2023/may/naics4_336100.htm#23-0000), divided by 70.4 percent for total employer costs for employee compensation,

adjustment, NHTSA estimates the hourly labor costs for manufacturers to be \$159.39 for Lawyers. The ECEC adjusted hourly cost for Computer Support Specialists (BLS Occupation code 15–1230) in the Motor Vehicle Manufacturing Industry is \$53.44 as reviewed in the discussion of table 1 data in the subpart A reporting burden analysis. NHTSA estimates the incremental labor cost associated with submitting each annual list to be \$1,328.56 or \$1,329 (\$159.39 per hour × 8 attorney hours + \$53.44 per hour × 1 IT hour), resulting in an estimated annual labor cost of \$131,527 for submitting all 99 annual lists each year.

NHTSA estimates that submitting each foreign recall or safety campaign report involves 1 hour of clerical work and 2 hours of translation work. The average hourly wage for Office Clerks (BLS Occupation code 43–9061) in the Motor Vehicle Manufacturing Industry is \$26.65<sup>5</sup> and the average hourly wage for Interpreters and Translators (BLS Occupation code 27–3091) is \$30.33.<sup>6</sup> Therefore, NHTSA estimates the ECEC adjusted hourly labor costs to be \$37.86 for Office Clerks and \$43.08 for Interpreters and Translators. NHTSA estimates the total labor cost associated with submitting one foreign recall or safety campaign report to be \$124.02 or \$124 (\$37.86 per hour × 1 Clerical hour + \$43.08 per hour × 2 Translator hours) and \$32,493.24 or \$32,493 for all 262 foreign recall or safety campaign reports NHTSA estimates will be submitted annually.

Table 3 provides a summary of the labor costs associated with the foreign reporting requirements in part 579, subpart B. NHTSA estimates that the total labor costs associated with the annual list requirement and the requirement to report foreign recalls and safety campaigns is \$164,020.68 (\$131,527.44 + \$32,493.24).

TABLE 3 - ANNUAL LABOR COST ESTIMATES FOR FOREIGN REPORTING

Submission Type and Labor Category	Hours Per Submission	Hourly Labor Cost	Labor Cost Per Submission	Number of Submissions	Total Annual Labor Cost
Annual List-Lawyer	8	\$159.39	\$1,275.12	99	\$126,236.88
Annual List-Computer Specialist	1	\$53.44	\$53.44	99	\$5,290.56
<b>Totals for Annual List</b>	<b>9</b>		<b>\$1,328.56</b>		<b>\$131,527.44</b>

[https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Last Accessed August 12, 2024.

<sup>5</sup> May 2023 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Office Clerks (Code 43-9061), \$26.65, [https://www.bls.gov/oes/2023/may/naics4\\_336100.htm#43-0000](https://www.bls.gov/oes/2023/may/naics4_336100.htm#43-0000), divided by 70.4 percent for total employer costs for employee compensation,

[https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Last Accessed August 12, 2024.

<sup>6</sup> May 2023 National Occupational Employment and Wage Estimates United States, U.S. Bureau of Labor Statistics, Interpreters and Translators (Code 27-3091), \$30.33, <https://www.bls.gov/oes/2023/may/oes273091.htm>, divided by 70.4 percent for total employer costs for employee compensation, [https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Last Accessed August 12, 2024.

Foreign Campaign Report-Clerical	1	\$37.86	\$37.86	262	\$9,919.32
Foreign Campaign Report-Translator	2	\$43.08	\$86.16	262	\$22,573.92
<b>Totals for Foreign Campaign Report</b>	<b>3</b>		<b>\$124.02</b>		\$32,493.24
<b>Total Labor Costs for Part 579 Subpart B Requirements</b>					<b>\$164,020.68 or \$164,021</b>

### **Requirements under Part 579, Subpart C (Reporting of Early Warning Information (EWR))**

The third component of this information collection covers the requirements found in part 579 subpart C, “Reporting of Early Warning Information.” Besides production information, there are five major categories requiring reporting of incidents or claims in subpart C, with the specific requirements and applicability of those categories varying by vehicle and equipment type and, in some circumstances, manufacturer volume. Sections 579.21–27 require manufacturers to submit the following:

(1) Production information; (2) reports on incidents involving death or injury in the United States that are identified in claims or notices alleging that the death or injury was caused by a possible defect; (3) reports on incidents identified in a claim against a manufacturer that involve one or more deaths in a foreign country and involve a vehicle or item of equipment that is identical or substantially similar to a vehicle or item of equipment that is offered for sale in the United States; (4) separate reports on the number of property damage claims, consumer complaints, warranty claims, and field reports that involve a specified system or event; (5) copies of field reports; and, for manufacturers of tires, (6) a list of common green tires (applicable to only tire manufacturers). Section 579.28(1) allows NHTSA to request additional information to help identify a defect related to motor vehicle safety. The regulation specifies the time frame for reporting for each category. Foreign recalls of substantially similar vehicles and manufacturer communications are required to be submitted monthly, substantially similar vehicle listings are required annually, and all other report types are required to be submitted every quarter.

#### Quarterly Reporting

Manufacturers are required to report production information to NHTSA on a quarterly basis (i.e., 4 times per calendar year)<sup>7</sup>. Estimates of the burden hours and reporting costs are based on:

- The number of manufacturers reporting;
- The frequency of required reports;
- The number of hours required per report; and
- The cost of personnel to report.

<sup>7</sup> Low volume and equipment manufacturers are not required to submit production information.

The number of hours for reporting ranges from 1 hour for trailer manufacturer to 8 hours for light vehicle manufacturers (table 4). Quarterly reporting burden hours are calculated by multiplying hours used to report for a given category by the number of manufacturers for the category and by the four times per year quarterly reporting. Using these methods and the average number of manufacturers who report annually, we estimate the annual burden hours for quarterly reporting at 3,664 hours as detailed below in table 4.

NHTSA assumes that the hourly wage rate for each quarterly report is split evenly between technical and clerical personnel and a weighted hourly rate is developed from this assumption. Therefore, using the BLS total hourly compensation rates discussed above of \$53.44 for a Computer Support Specialist and \$37.86 for an Office Clerk, the weighted hourly rate is \$45.65 (Technical Mean Hourly Wage of \$53.44 × 0.5 + Clerical Mean Hourly Wage of \$37.86 × 0.5). The estimated reporting costs are calculated as follows:

$$(M \times T_p \times \$45.65) = \text{Quarterly cost of reporting} \times 4 = \text{Annual cost of reporting}^*$$

\*M = Manufacturers reporting data in the category; T<sub>p</sub> = Reporting time for the category;  
 \$45.65 = Reporting labor cost compensation rate; 4 = Quarterly reports per year

For example, the estimated annual reporting cost for light vehicles is \$59,892.80 (41 manufacturers × 8 hours × \$45.65 compensation rate × 4 quarters), and the total annual labor costs associated with quarterly reporting are estimated to be \$167,262. Table 4 includes the estimated burden hours and reporting costs for production information, non-dealer field reports, aggregate submissions, and death and injury submissions, as well as the quarterly and annual labor costs associated with reporting.

TABLE 4 - ESTIMATED MANUFACTURER ANNUAL BURDEN HOURS AND LABOR COSTS FOR QUARTERLY REPORTING

Vehicle/Equipment Category	Avg. Number of Manufacturers	Quarterly Hours to Report per Manufacturer	Blended Hourly Comp. Rate	Quarterly Labor Costs per Manufacturer	Annual Burden Hours for Reporting	Annual Labor Costs
Light Vehicles	41	8	\$45.65	\$365.20	1,312	\$59,892.80
Bus, Emergency, and Medium-Heavy Vehicles	54	5	\$45.65	\$228.25	1,080	\$49,302.00
Motorcycles	16	2	\$45.65	\$91.30	128	\$5,843.20
Trailers	91	1	\$45.65	\$45.65	364	\$16,616.60
Child Restraints	35	1	\$45.65	\$45.65	140	\$6,391.00
Tires	31	5	\$45.65	\$228.25	620	\$28,303.00
Low Volume & Equipment <sup>8</sup>	5	1	\$45.65	\$45.65	20	\$913.00

<b>Totals</b>	<b>273</b>				<b>3,664</b>	<b>\$167,261.60 or \$167,262</b>
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Early Warning Reporting (EWR) Field Data Submissions<sup>9</sup>

Table 5 provides an average annual submission count for each category submitted per the requirements of 49 CFR 579, subpart C: reports on incidents involving death or injury in the United States; reports on incidents involving one or more deaths in a foreign country involving a vehicle or item of equipment that is identical or substantially similar to a vehicle or item of equipment that is offered for sale in the United States; separate reports on the number of property damage claims, consumer complaints, warranty claims, and field reports that involve a specified system or event; copies of field reports; and, for manufacturers of tires; a list of common green tires; and additional follow-up information per § 579.28(l) related to injury and fatality claims or comprehensive inquiries. Each reporting category has specific requirements and types of reports that need to be submitted and we state “N/A” where there is no requirement for that reporting category.

**TABLE 5 - ANNUAL AVERAGE OF EWR SUBMISSIONS BY MANUFACTURERS (2021 – 2023)**

Category of Claims	Light Vehicles § 579.21	Bus, Emergency, Heavy, & Medium Vehicles § 579.22	Motor-cycles § 579.23	Trailers § 579.24	Child Restraints § 579.25	Tires § 579.26	Low Volume Vehicles & Equipment § 579.27	Annual Average Totals
Incidents Involving Injury or Fatality in U.S.	6,338	223	109	44	133	35	10	6,892
Incidents Involving Fatality in Foreign Country	38	0	2	1	0	0	0	41
Reports on Number of Claims Involving Specific System or Event	7,985	831	23	55	NA	298	NA	9,192
Mfr. Field Reports	83,360	18,650	1,456	81	2,859	NA	NA	106,406

<sup>8</sup> Reporting requirements for low volume vehicle and equipment manufacturers are limited to reporting fatal incidents in the United States and foreign countries and responding to inquiries about those incidents, see § 579.27 and § 579.28(l). Table 4 manufacturer counts are calculated by dividing the number of total manufacturer reporting quarters (1 manufacturer reporting in 1 quarter = 1 manufacturer reporting quarter) by 4 quarters to show the number of equivalent full manufacturer reporting years (4 manufacturer reporting quarters).

<sup>9</sup> Field data includes incidents identified in claims or notices involving deaths or injuries and consumer complaint, field report, property damage claim and warranty claim data.

Common Green Tire Reporting	NA	NA	NA	NA	NA	99	NA	99
Average Number of Follow-Up Sequences per 579.28(l)	1,425	91	67	14	64	44	14	1,719
<b>Totals:</b>	<b>99,146</b>	<b>19,795</b>	<b>1,657</b>	<b>195</b>	<b>3,056</b>	<b>476</b>	<b>24</b>	<b>124,349</b>

The submission totals summarized in table 5 represent a 10 percent increase from the currently approved information collection with two reporting categories responsible for all of the increase. Submission totals increased for manufacturer field reports and follow-up sequence inquiries conducted per § 579.28(l) but saw a net decrease of 34 percent for the other four categories combined. Average annual injury and fatality claims in the United States dropped from 11,887 to 6,892 claims per year, a 42 percent decrease; foreign death claims dropped from 330 to 41 per year, an 88 percent decrease; claims involving specific systems or events dropped from 12,212 to 9,192, a 25 percent decrease; and common green tire reports dropped from 112 to 99 per year, a 12 percent decrease. Manufacturer field reports, which accounted for the majority of submissions in both the current and prior approved information collection requests, rose from 88,409 to 106,406 per year, a 20 percent increase.<sup>10</sup> Death and injury follow-up sequence inquiries conducted per § 579.28(l) saw a much larger change, rising from 190 to 1,719 average incident inquiries per year, an increase of 805 percent. The net effect of these changes was an increase from 113,140 to 124,349 submissions per year on average.

The agency estimates that an average of 5 minutes is required for a manufacturer to process each report, except for foreign death claims and follow-up responses. We estimate foreign death claims and follow-up responses per § 579.28(l) require an average of 15 minutes to process. Multiplying the total average number of minutes by the number of submissions NHTSA receives in each reporting category yields the burden hour estimates found below in table 6. Our previous estimates of EWR associated submission burden hours totaled 9,515 hours, and we now update that total to 10,655 burden hours, a 12 percent increase, associated with the above noted claim categories.

TABLE 6 - ANNUAL MANUFACTURER BURDEN HOUR ESTIMATES FOR EWR SUBMISSIONS

Category of Claims	Annual Average of EWR Submissions	Average Time to Process Each Report	Estimated Annual Burden Hours
Incidents Involving Injury or Fatality in U.S.	6,892	5	574
Incidents Involving Fatality in Foreign Country	41	15	10

<sup>10</sup> Manufacturer field reports rose from 78 percent of EWR submissions in the currently approved information collection to 86 percent of submissions in the current information collection request.

Reports on Number of Claims Involving Specific System or Event	9,192	5	766
Mfr. Field Reports	106,406	5	8,867
Common Green Tire Reporting	99	5	8
Average Number of Follow-Up Sequences per 579.28(l)	1,719	15	430
<b>Totals:</b>	<b>124,349</b>		<b>10,655</b>

We have also calculated hourly labor costs for each claim type with an incremental reporting burden based on time to process and labor costs for employee positions required for processing each submission. Table 7 shows the employee positions required for processing submissions for each claim type, the time required for each position to process each submission, and the weighted hourly rates for each claim type. The employee positions analyzed in table 7 include three that have been introduced in prior sections of this information collection request: Lawyers (BLS Occupation code 23–1000), Computer Support Specialists (BLS Occupation code 15–1230), and Office Clerks (BLS Occupation code 43-9061).<sup>11</sup> Cost analysis for Computer Support Specialists was provided in the discussion of table 1 data for subpart A labor costs analysis and analyses for Lawyers and Office Clerks were provided in the discussion of table 3 data for subpart B labor cost burden analysis. Labor cost analysis for Engineers (BLS Occupation code 17-2000) is introduced in table 7. The average hourly wage for Engineers in the Motor Vehicle Manufacturing Industry is \$52.56.<sup>12</sup> After applying the 70.4 percent ECEC adjustment, NHTSA estimates the hourly labor costs for manufacturers to be \$74.66 for Engineers. Table 7 shows the weighted hourly rates for each submission claim type.

**TABLE 7 - ESTIMATED MANUFACTURER TIME ALLOCATION BY CLAIM TYPE AND WEIGHTED HOURLY RATE**

Claim Type	Estimated Time (in minutes) to Review a Claim					Weighted Hourly Rate
	Lawyer (rate: \$159.39)	Engineer (rate: \$74.66)	Technical (rate: \$53.44)	Clerical (rate: \$37.86)	Total Time	
Incidents Involving Injury or Fatality in U.S.	3	0	0	2	5	\$110.78
Incidents Involving Fatality in Foreign Country	3	10	0	2	15	\$86.70
Reports on Number of Claims	0	0	3	2	5	\$47.21

<sup>11</sup> Table 7 references Computer Support Specialists as “Technical” and Office Clerks as “Clerical”.

<sup>12</sup> May 2023 National Industry-Specific Wage Estimates - Motor Vehicle Manufacturing, U.S. Bureau of Labor Statistics, Engineers (Code 17-2000), \$52.56, [https://www.bls.gov/oes/2023/may/naics4\\_336100.htm#17-0000](https://www.bls.gov/oes/2023/may/naics4_336100.htm#17-0000), divided by 70.4 percent for total employer costs for employee compensation, [https://www.bls.gov/news.release/archives/ecec\\_03132024.pdf](https://www.bls.gov/news.release/archives/ecec_03132024.pdf). Last Accessed August 12, 2024.



Involving Specific System or Event						
Mfr. Field Reports	0	0	3	2	5	\$47.21
Common Green Tire Reporting	0	0	0	5	5	\$37.86
Average Number of Follow-Up Sequences per 579.28(l)	3	10	0	2	15	\$86.70

These rates are calculated by summing the weighted employer costs for each employee position required to review each submission claim type using the formula:

$$\sum_{i=1}^n C_i \times \left(\frac{T_i}{T_t}\right) = \text{Weighted Hourly Rate (W) for each claim type*}$$

\*C<sub>i</sub> = Employer cost for position i; T<sub>i</sub> = Claim type review time for position i; T<sub>t</sub> = Total review time for the claim type; n = 4 (number of employee positions in table 7)

The annual labor costs for submissions of claims data are shown in table 8. Labor Cost per Submission is the product of the Average Time to Process Each Report and the Weight Hourly Rate calculated in table 7. Annual labor cost is the product of the labor cost per submission and the average annual submissions.

TABLE 8 - ESTIMATED EWR ANNUAL LABOR COSTS BY CATEGORY

Category of Claims	Annual Average of EWR Submissions	Average Time to Process Each Report	Weighted Hourly Rate	Estimated Labor Cost per Submission	Estimated Annual Labor Cost
Incidents Involving Injury or Fatality in U.S.	6,892	5	\$110.78	\$9.23	\$63,624.65
Incidents Involving Fatality in Foreign Country	41	15	\$86.70	\$21.68	\$888.68
Reports on Number of Claims Involving Specific System or Event	9,192	5	\$47.21	\$3.93	\$36,162.86
Mfr. Field Reports	106,406	5	\$47.21	\$3.93	\$418,618.94
Common Green Tire Reporting	99	5	\$37.86	\$3.16	\$312.35
Average Number of Follow-Up Sequences per 579.28(l)	1,719	15	\$86.70	\$21.68	\$37,259.33
<b>Totals:</b>	<b>124,349</b>				<b>\$556,866.81or \$556,867</b>

The total annual manufacturer burden hours for subpart C reporting of EWR data (Sections 579.21–28) is calculated by summing the burden hour estimates for quarterly reporting in table 4 (3,664 hours) and submission reporting in table 6 (10,655 hours). This produces an EWR annual burden hour estimate of 14,319 hours. The total annual labor cost for subpart C reporting is calculated by summing the labor cost estimates in table 4 (\$167,261.60) and table 8 (\$556,866.81), producing a total annual labor cost estimate for subpart C reporting of \$724,128.41 or \$724,128.

**Computer Maintenance Burden**

In addition to the burden associated with submitting documents under each subpart of part 579, NHTSA also estimates that manufacturers will incur computer maintenance burden hours associated with the information collection requirements. The estimated manufacturer burden hours associated with aggregate data submissions for consumer complaints, warranty claims, and dealer field reports are included in reporting and computer maintenance hours. The burden hours for computer maintenance are calculated by multiplying the hours of computer use (for a given category) by the number of manufacturers reporting in a category. NHTSA estimates that light vehicle manufacturers will spend approximately 347 hours per year on computer maintenance and that other vehicle manufacturers will spend about 22 percent as much time as light vehicle manufacturers on computer maintenance. Therefore, NHTSA estimates that bus, emergency, and medium-heavy truck; motorcycle; and trailer manufacturers will each spend approximately 86.5 hours on computer maintenance each year. NHTSA estimates that child restraint and tire manufacturers will also spend 86.5 hours on computer maintenance per year. Therefore, NHTSA estimates the total burden for computer maintenance to be 33,863 hours per year (based on there being an estimated 41 light vehicle manufacturers; 54 bus, emergency, and medium-heavy vehicle manufacturers; 16 motorcycle manufacturers; 91 trailer manufacturers; 35 child restraint manufacturers; and 31 tire manufacturers). This burden estimation is an update from the 60-day notice due to corrections to the number of bus, emergency, and medium-heavy vehicle manufacturers reporting to NHTSA.

To calculate the labor cost associated with computer maintenance hours, NHTSA looked at wage estimates for the type of personnel submitting the documents. The ECEC adjusted average hourly wage for Computer Support Specialists (BLS Occupation code 15–1230) in the Motor Vehicle Manufacturing Industry is \$53.44 as reviewed in the discussion of table 1 data in the subpart A reporting burden analysis. For the estimated total of 33,863 annual computer maintenance burden hours, NHTSA estimates the associated labor costs will be approximately \$1,809,612 annually. Table 9 shows the annual estimated burden hours for computer maintenance by vehicle/equipment category and the estimated labor costs associated with those burden hours.

TABLE 9 - ESTIMATED MANUFACTURER ANNUAL BURDEN HOURS FOR COMPUTER MAINTENANCE FOR REPORTING

Vehicle/Equipment	Average	Hours for	Average	Annual	Total	Total Annual
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Category	Number of Manufacturers	Computer Maintenance per Manufacturer	Hourly Labor Cost	Labor Cost per Manufacturer	Annual Burden Hours	Labor Costs
Light Vehicles	41	347	\$53.44	\$18,543.68	14,227	\$760,290.88
Bus, Emergency, and Medium-Heavy Vehicles	54	86.5	\$53.44	\$4,622.56	4,671	\$249,618.24
Motorcycles	16	86.5	\$53.44	\$4,622.56	1,384	\$73,960.96
Trailers	91	86.5	\$53.44	\$4,622.56	7,872	\$420,652.96
Child Restraints	35	86.5	\$53.44	\$4,622.56	3,028	\$161,789.60
Tires	31	86.5	\$53.44	\$4,622.56	2,682	\$143,299.36
<b>Totals</b>					<b>33,863</b>	<b>\$1,809,612.00 or \$1,809,612</b>

### Total Annual Burden Hours and Labor Costs Summary

Based on the foregoing, we estimate the burden hours for industry to comply with the current part 579 reporting requirements (EWR requirements, foreign campaign requirements and part 579.5 requirements) to be 51,327 hours per year. This a change from the 60-day notice estimates of 54,088 annual burden hours due to updates of estimation from the early warning reports and computer maintenance tables resulting from corrections in the number of bus, emergency, and medium-heavy vehicle manufacturers reporting each year. The total annual burden hours, labor costs, and changes from for this information collection consisting of manufacturer communications under Section 579.5 (subpart A), foreign reporting (subpart B), EWR submissions and reporting (subpart C), and computer maintenance are outlined in table 10 below.

TABLE 10 - TOTAL MANUFACTURER ANNUAL BURDEN HOURS AND LABOR COSTS

Reporting Type	Currently Approved Part 579 Information Collection Request		Pending Part 579 Information Collection Request		Changes in Burden Hours and Labor Costs	
	Annual Burden Hours	Annual Labor Costs	Annual Burden Hours	Annual Labor Costs	Annual Burden Hours	Annual Labor Costs
Subpart A: Manufacturer Communications § 579.5 (Table 1)	2,074	\$92,817	1,468	\$78,387	(606)*	(\$14,430)*
Subpart B: Foreign Reporting (Tables 2 & 3)	1,590	\$139,464	1,677	\$164,021	87	\$24,557
Subpart C: EWR Submissions and Quarterly Reporting (Tables 4 & 6/8)	14,731	\$621,260	14,319	\$724,128	(412)*	\$102,868
Computer Maintenance (Table 9)	35,415	\$1,585,861	33,863	\$1,809,612	(1,552)*	\$223,751

<b>Total</b>	<b>53,810</b>	<b>\$2,439,402</b>	<b>51,327</b>	<b>\$2,776,148</b>	<b>(2,657)*</b>	<b>\$365,606</b>
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\*Reduction from currently approved ICR

13. Provide estimates of the total annual cost to the respondents or recordkeepers resulting from the collection of information.

NHTSA estimates the collection requires no additional costs to the respondents beyond the labor costs associated with the burden hours to collect and submit the reports to NHTSA and the labor hours and associated labor costs for computer maintenance.

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

Information submitted under part 579 is entered into NHTSA's Artemis system and subsequently analyzed. NHTSA estimates that the annualized cost estimate for the data is approximately \$2,232,690 for collecting and processing data, \$622,570 for computer and network support, and \$469,240 for compliance and outreach. The total cost to the Government is \$3,324,500.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

This is request for an extension without change of a currently approved information collection. However, in this extension request, there are burden hour changes. The burden estimates show an overall decrease in annual burden hours of 2,483 hours from the part 579 information collection request approved in April 2022. The changes in annual burden hours are due to changes in the number of submissions in tables 1, 2, and 6 and changes in the number of manufacturers reporting in each category in tables 4 and 9. Most of the decrease resulted from corrections in the number of manufacturers reporting subpart C information in the bus, emergency, and medium and heavy vehicle category.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.

NHTSA publishes certain information collected under part 579 on its website at <https://www.nhtsa.gov/vehicle-manufacturers/early-warning-reporting-ewr>. This includes EWR death and injury data, property damage claims or production

information for light vehicles that has not been granted confidential treatment by NHTSA's Office of Chief Counsel (see reference to response to question 10). The data on NHTSA's website is periodically updated to include the latest EWR death and injury data, property damage claims or production information for light vehicles.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval is 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>13</sup>

There are no exceptions.

NHTSA will provide a PRA statement and OMB Control Number on its public Early Warning Reporting website within the "Submitting Data" section, as well as within the Manufacturer Portal where manufacturers upload their respective Early Warning Reporting data.

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 2127-0616. The information collected on this form is necessary to assist NHTSA in the identification of potential safety defects in motor vehicles or motor vehicle equipment. Based on the type of data being collected, the time required to submit data will vary for each data type and manufacturer. The public reporting burden for this mandatory collection of information is estimated to range from five (5) minutes to three hundred forty-seven (347) hours per reporting activity. More detailed burden estimates are provided in Federal Register notice 2025-02615 (National Highway

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<sup>13</sup> Specifically explain how the agency display the OMB control number and expiration date and 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.

Traffic Safety Administration, “Agency Information Collection Activities; Proposals, Submissions, and Approvals: Reporting of Information and Documents about Potential Defects,” 90 FR 9655, February 14, 2025). The information collected is mandatory under 49 CFR part 579. 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 Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.