

Information Collection Request Supporting Statements: Part A
Limousine Crashworthiness Safety Research
OMB Control No. 2127-XXXX

A. Justification

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

On November 15, 2021, Public Law No: 117-58, also known as the Infrastructure Investment and Jobs Act (IIJA), became law. Sections 23015 and 23023 of the IIJA mandated that the Secretary of Transportation, NHTSA through delegation, shall conduct a variety of research and actions, including the following:

- Research the development of motor vehicle safety standards for side impact protection, roof crush resistance, and air bag systems for the protection of occupants in limousines with alternative seating positions, including perimeter seating arrangements.
- Research the safety features and standards that aid evacuation in the event that an exit in the passenger compartment of a limousine is blocked.
- Amend FMVSS Nos. 207, 208, 209, and 210 such that they apply to limousines on each designated seating position, including side-facing seats.

This information collection will help NHTSA understand the limousine market and characteristics of limousine vehicles that would be part of any future regulatory cost and benefit assessment.

To achieve this market understanding, NHTSA has contracted with R.L. Polk & Co. (also known as S&P Global Mobility) to conduct a market study using a multiphase approach consisting of vehicle and fleet registrations analysis and literature review. In the interview phase, S&P Global Mobility will conduct a series of highly targeted 10–15 question interviews with key entities within the limousine market to gather data on limousine characteristics, fabrication, and safety-related questions on evacuation, crashworthiness, seating, and restraints. The prior interview phase consisted of nine (9) targeted interviews. The current information collection request is for the facilitation of a second interview phase with outreach not to exceed 160 contacts in order to arrive at forty-one (41) second interview responses, totaling fifty (50) responses between the two phases.

Title 23, United States Code, Chapter 4, Section 403 authorizes NHTSA to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to all aspects of highway and traffic safety systems and conditions relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; and human behavioral factors and their effect on highway and traffic safety, including distracted driving. [See 23 U.S.C. 403(b)(1)(A)(i), 23 U.S.C. 403(b)(1)(A)(ii), and 403(b)(1)(B)(iii)].

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.

This request for Office of Management and Budget (OMB) approval of a new information collection is to aid NHTSA in understanding the limousine market and characteristics of limousine vehicles with respect to crashworthiness and occupant safety. Many federal safety regulations (e.g., FMVSS No. 208, 209, and 210) do not currently apply to limousines despite limousines having characteristics of typical passenger vehicles, and limousine occupants can often be seated in non-traditional orientations (e.g., rear- and side-facing seats) as compared to those of a typical passenger vehicle. Because the extent of both limousine crash safety features and performance is not well known, the interviews and resulting data on evacuation, crashworthiness, seating, and restraints, will facilitate ongoing NHTSA research into limousine safety with respect to any future cost-benefit analyses.

Interviews will be conducted by a NHTSA contractor, S&P Global Mobility, and interview results will be collected and summarized in a report. In the interest of government transparency, the final report will be available to the public via the National Transportation Library.

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.

Information will be collected via in-person or over-the-phone interviews with limousine fleet operators and fabricators; therefore, automated, electronic, mechanical, or other technological collection techniques or other forms of information technology are not feasible. All data collection will be performed solely by the contractor, and the interviewees will only be responsible for oral responses.

There is no electronic data collection for these interviews. Given the small business component of this information collection, it is important for the interviewer to develop a rapport with the respondent to facilitate an honest and open conversation.

- 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.**

There have been no similar data collection efforts of this nature. NHTSA piloted this data collection with a first round of interviews that was limited to nine total respondents. Prior to the initial interview phase with nine respondents, NHTSA and the contractor were unable to find a source with the information.

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

Some interview respondents will be small businesses; however, the 15-question interview guide is not expected to impose substantial burden on the small business. This is a one-time collection of information, conducted as an in-person or over-the-phone format, scheduled at a time that is most convenient for the respondent, and presented in the format that is most convenient.

- 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.**

This information collection is necessary to comply with congressional mandates under the IIJA Section 23015 Limousine Research and Section 23023 Limousine Compliance with Federal Safety Standards. Furthermore, if new safety standards are warranted, the information would help complete the cost-benefit analysis required by the Executive Orders 12866 and 13563, DOT Order 2100.6A and the Department of Transportation's regulatory policies and procedures.

- 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.**

No special circumstances require this collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views 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 60-day Federal Register Notice, which notified the public of NHTSA's intent to conduct this collection of information and provided a 60-day comment period on October 7, 2024 (89 FR 81134). Additionally, NHTSA notified the public about the research and the opportunity to comment on the information collection at the NHTSA Safety Research Portfolio Public Meeting,¹ which had an approximate attendance of 1,228.

NHTSA received one comment during the 60-day notice period. The comment came from the National Association of Mutual Insurance Companies (NAMIC) and expressed support for NHTSA's information collection. Specifically, the comment stated:

¹ <https://www.nhtsa.gov/events/nhtsa-safety-research-portfolio-public-meeting-fall-2024>. Day 1: Opening Remarks & Crashworthiness: 21:50.

“NAMIC supports this effort and the intended safety goal. The proposed collection of information seems reasonably necessary to assist in safety determinations and to have practical utility.”

NHTSA opened docket NHTSA-2024-0040 to announce and receive comment regarding the NHTSA Safety Research Portfolio Public Meeting at which this research was discussed. Two comments were received to this docket; however, neither referenced the Limousine Study.

With no objections to the information requested during the study, nor comments regarding the burden estimates, no changes were made to the study.

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

Respondents will not receive any payment or gifts for participation in this information collection.

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.

No personal information will be recorded when interviews are conducted. Published documents will provide only summary information collected by the interviews and cannot be used to identify any individual. Furthermore, all respondents will be anonymized during data collection, and respondent business information will not be made available or identifiable from the published reports.

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.

Interview guides do not contain questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

This information collection will consist of interviews conducted across three categories of limousine manufacturers: limousine fleet operators (OEMs), limousine fabricators associated with an Original Equipment Manufacturer limousine program (OEM Program Participants), and limousine fabricator not associated with an OEM program (OEM Program Non-Participant). The research team is targeting a minimum of 10 respondents from each of the three categories and then approximately equal distribution of the 11

remaining planned responses to arrive at a total of a minimum of 41 responses. Respondents in some of the groups may be more difficult for interview completion than others; thus, the target maximum respondent outreach is as follows: a maximum of 20 OEMs will be contacted (greatest expected response rate), a maximum of 40 OEM program participants will be contacted (mid-range expected response), and a maximum of 100 OEM program non-participants will be contacted (these will be the smaller businesses, and response rate is expected to be low). While each interview guide varies slightly, the time to complete the interview is not expected to vary greatly with an average of 60 minutes per interview. While NHTSA and the research team will discontinue the interview process after a minimum of 41 responses is complete across a relatively equal distribution of the categories, there is no similar study to calculate response rates nor average completion time of an incomplete response or declined interview. Therefore, for calculation of burden, NHTSA and the research team have used the maximum number of contacts to provide an absolute maximum burden. The table below provides estimated burden costs and hours.

The database of respondents of limousine manufacturers is from S&P Global Mobility and their extensive canvassing of the automotive industry. The respondents in each category will be selected at random and given the opportunity to accept or decline the interview before moving on to the subsequent outreach effort.

To calculate the labor cost associated with the interviews, the research team looked at wage estimates for the type of personnel responding to the interviews. NHTSA estimates the total labor costs associated with these burden hours by looking at the average wage for Marketing/Sales Managers across the nation. The Bureau of Labor Statistics (BLS) estimates that the average hourly wage for Marketing/Sales Managers (BLS Occupation code 11-2020) in the Motor Vehicle Manufacturing Industry is \$81.01.² The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.4% of total labor compensation costs.³ Therefore, NHTSA estimates the hourly labor costs to be \$115.07 for Marketing/Sales Managers.

The maximum number of responses for OEM, OEM participant program, and OEM program non-participant interview attempts will be 20, 40, and 100 respectively. There will be one 60-minute interview per respondent. Thus, the total burden hours will be 160. Total labor costs for this information collection associated with 160 hours is \$18,410, while the annual burden and labor costs are estimated to be 53 hours and \$6,137. Table 1 provides a summary of the estimated burden hours and labor costs associated with those submissions. Note there are slight variations between the total and the annual figures based on rounding.

² See May 2021 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, available at https://www.bls.gov/oes/2023/may/naics4_336100.htm (accessed September 21, 2023).

³ See June 2023 Table 1. Employer Costs for Employee Compensation by ownership, available at <https://www.bls.gov/news.release/ecec.t01.htm> (accessed February 21, 2025).

Table 1: Total Burden Estimates

Information Collection	Number of Respondents (Total/Annual)	Frequency of Response	Time (Minutes)	Hourly Labor Cost	Burden Hours	Labor Costs (Rounded)
Interview Guide – OEM (NHTSA Form 1802)	20 total 7 annual	1	60 Minutes	\$115.07	20 total 7 annual	\$2,301 total \$767 annual
Interview Guide – OEM Program Participant (NHTSA Form 1804)	40 total 13 annual	1	60 Minutes	\$115.07	40 total 13 annual	4,602 total \$1,534 annual
Interview Guide – OEM Program Non-participant (NHTSA Form 1803)	100 total 33 annual	1	60 Minutes	\$115.07	100 total 33 annual	\$11,507 total \$3,836 annual
				Total	160	\$18,410
				Annual	53	\$6,137

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

There will be no start-up or record-keeping costs to respondents to complete the interviews. Respondents are completing the interview in-person or via phone, and no equipment or software is required for completion. Participation is voluntary, and the only burden to the respondents is that outlined in supporting statement question 12.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

NHTSA will be utilizing contractors to complete this information collection. The contract cost to the Federal government to collect, analyze, and report on the information collected in the interviews is a one-time charge of \$151,000. This is the total contract cost for the full project. Over the three-year approval period the estimated annualized cost to the Federal government is \$50,333.

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

change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

This is a new collection. Therefore, the annual number of burden hours and annual labor cost are identified in supporting statement question 12 above, which is 53 hours and \$6,137.

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 plans to publish the results in a final report written by the contractor. The nature of the data will not require complex analytical techniques.

NHTSA estimates that the contractor will conduct the interviews and write the contractor's final report within the three-year approval period, which will include an executive summary, introduction, methodology, results, discussion, and conclusions sections. Following receipt of the contractor's final report, NHTSA will publish the report in the National Transportation Library (NTL), which requires internal review and approval by multiple offices within the agency. The contractor will submit a single report that summarizes the results of all interview responses.

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

NHTSA is not seeking such approval. NHTSA will 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 1320.9.⁴

⁴ 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.

There are no exceptions. The expiration date and Paperwork Reduction Act Statement will be displayed on paper versions and interviewers will ask respondents if they would like to hear this information during phone interviews.

Paperwork Reduction Act Statement Language will be as follows:

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-XXXX. The information collected in this study will support NHTSA in understanding the limousine market and characteristics of limousine vehicles with respect to fabrication, and safety-related questions on evacuation, crashworthiness, seating, and restraints. We estimate that it will take approximately one hour to complete the questions in this interview. 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.